

# Cybersecurity Pilot Overview

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# Cybersecurity Pilot Overview

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- FCC adopted \$200 million Cybersecurity Pilot Program in June 2024
- 3-year initiative, but only 1 application window
- We are awaiting an announcement on what will be eligible funding dates
  - Will purchases after January 1, 2025 be eligible? April 1?
- If you're eligible for E-rate, you're eligible for CPP
  - But prior participation in E-rate is not required
- Schools and libraries may only apply and participate as an individual school or library participant – OR as part of a consortium. Not both.
- E-rate competitive bidding rules and requirements will apply
  - Order mentions a limited state master contract exemption (like PEPPM)
  - We're awaiting further clarification (FAQ) on what is included
    - *I'm not optimistic that any bidding exemptions will be allowed*

# Funding Caps Overview

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- \$200 million total program cap (amount that will be disbursed)
  - This is not an annual amount
- Each applicant has a maximum, pre-discount amount (budget) they can request
- If selected, participants must pay their non-discounted share of the eligible services and equipment costs, using their FY 2024 approved E-Rate Category 1 discount
- **Important:** applicants can seek reimbursement as funds are incurred
  - For example, if you purchase a 3-year MFA license, you can request reimbursement for the total cost in Year 1
  - Or you can spend it all (and be reimbursed for it all) in Year 1, 2 or 3 (or combination)



# Funding Caps – Schools/Libraries

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- **Schools:** Each school is eligible to receive up to \$40.80 per student, over 3 years, on a pre-discount basis
  - There is a pre-discount minimum floor of \$45,000 if the school or district has 1,100 or fewer students, and a pre-discount maximum of \$4.5 million



- **Libraries:** Each library is eligible to receive a pre-discount budget of \$45,000, over 3 years, up to 11 libraries/sites
  - For library systems with more than 11 libraries/sites, the budget will be up to \$525,000 pre-discount over 3 years

# Funding Caps – Consortia



- **School Consortia:** Consortia comprised of eligible schools will be eligible to receive funding based on student count, using the pre-discount \$40.80 per-student multiplier, up to a maximum of \$4.5 million pre-discount funding cap



- **Library Consortia:** Consortia comprised of eligible libraries will be eligible to receive funding based on the number of library sites, using the pre-discount \$45,000 per-library budget up to 11 libraries/sites, up to a maximum \$525,000 pre-discount funding cap



- **School & Library Consortia:** Consortia comprised of both eligible schools and libraries will be subject to the pre-discount \$4.5 million budget maximum applicable to schools

# What's Eligible

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- Four categories of eligible equipment/services:
  - Advanced/Next Generation Firewalls
  - Endpoint Protection
  - Identity Protection and Authentication
  - Monitoring, Detection, and Response(Applicants may apply for equipment/services from more than one category)
- **CPP Eligible Services List:** <https://www.fcc.gov/cybersecurity-pilot/cybersecurity-pilot-eligible-services-list>
- No equipment or service that's eligible for E-rate is eligible for CPP
  - Note: Basic firewalls are not eligible for CPP because they're eligible for E-rate, but Advanced Firewalls are eligible for CPP
- Installation, configuration, and minimal training services are eligible. Other consulting and/or staff costs are not eligible
- No prior purchases or contracts will be eligible

# Pilot Participant Selection

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- This is a *competitive* program – not every applicant will be selected to participate
  - “To facilitate the inclusion of a diverse set of Pilot projects and **to target Pilot funds to the populations most in need of cybersecurity support, particularly those with minimal or no cybersecurity protections today**, we anticipate selecting projects from, and providing funding to, a combination of large and small and urban and rural schools, libraries, and consortia, **with an emphasis on funding proposed Pilot projects that include low-income and Tribal applicants.**”
  - “We note that applications will be evaluated as a whole with an eye to selecting diverse projects, and that an applicant’s answer to any individual question on the first part of the FCC Form 484 will not necessarily be dispositive of its eligibility for the Pilot Program.”

# Pilot Application Process



- Application process will open this fall – no dates yet
  - *Julie's guess: application window will open in mid-late September and be open for 30 - 45 days?*
- **General application/funding process:**
  - Applicants submit Form 484 Part 1 – General questions (see paragraph 63 of FCC Order) during 'application window'
  - FCC/USAC officials review applications and select/announce Pilot participants (expedited basis)
  - If selected, Pilot participants will then:
    - Complete Form 484 Part 2 – Detailed questions
    - Form 470 bidding (minimum 28 days) (*unsure if bidding can be done concurrently with Form 484 Part 2*)
    - Vendor contract signing
    - Submit CPP Form 471 to request funding
    - USAC issues FCDL, approving or denying requests
    - Equipment/Services purchased
    - CPP reimbursement forms submitted to USAC
      - Can use BEAR or SPI process

Mirrors E-rate process

**All forms  
submitted in  
EPC Portal**



# Pilot Application Process



- 1 • Applicants submit Form 484, Part 1
- 2 • FCC/USAC review applications
- 3 • FCC announces Pilot Participants in public notice
- 4 (if selected)  
• Complete Form 484, Part 2
- 5 • File Form 470 to competitively bid equipment/services – minimum 28 days
- 6 • Sign vendor contract(s)
- 7 • Submit Pilot Form 471 to request funding and detail equipment/services
- 8 • PIA Review: USAC reviews Pilot Form 471s and issues Pilot FCDLs, approving or denying requests
- 9 • Applicant purchases equipment/services
- 10 • Pilot reimbursement forms submitted to USAC (BEAR or SPI)

# Form 484 – Part 1 Overview

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- USAC will be presenting webinar Tuesday, August 20 @ 3:00 that will review info required on the Form 484, Part 1. Register at:  
<https://register.gotowebinar.com/register/8998316741094565212>
- Generally, Form 484, Part 1 will ask applicants to:
  - Describe goals and objectives for participation
  - Identify risks the Pilot can help address
  - Outline cybersecurity experience and expertise
  - Provide services and equipment to be purchased and estimated costs
- Form 484 Part 1 required info found in Paragraph 63 of FCC Order  
<https://docs.fcc.gov/public/attachments/FCC-24-63A1.pdf>.
- Exact text as follows...

# Form 484 – Part 1 Detailed

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1. A broad description of the proposed Pilot project, including, but not limited to, a description of the applicant’s goals and objectives for the proposed Pilot project, a description of how Pilot funding will be used for the proposed project, and the cybersecurity risks the proposed Pilot project will prevent or address.
2. The cybersecurity equipment and services the applicant plans to request as part of its proposed project, the ability of the project to be self-sustaining once established, and whether the applicant has a cybersecurity officer or other senior-level staff member designated to be the cybersecurity officer for its Pilot project.
3. Whether the applicant has previous experience implementing cybersecurity protections or measures (answered on a yes/no basis), how many years of prior experience the applicant has (answered by choosing from a preset menu of time ranges (e.g., 1 to 3 years)), whether the applicant has experienced a cybersecurity incident within a year of the date of its application (answered on a yes/no basis), and information about the applicant’s participation or planned participation in cybersecurity collaboration and/or information-sharing groups.
4. Whether the applicant has implemented, or begun implementing, any Education Department or CISA best practices recommendations (answered on a yes/no basis), a description of any Education Department or CISA free or low-cost cybersecurity resources that an applicant currently utilizes or plans to utilize, or an explanation of what is preventing an applicant from utilizing these available resources. *(see slide 16)*

# Form 484 – Part 1, cont.

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5. An estimate of the total costs for the proposed Pilot project, information about how the applicant will cover the non-discount share of costs for the Pilot-eligible services, and information about other cybersecurity funding the applicant receives, or expects to receive, from other federal, state, local, or Tribal programs or sources.

*(Note: The costs that you list here are estimates. If you're selected to participate, you will not be committed this amount of funding. The official request for funding will come at the Form 471 stage. Should more than \$200 million be requested by all Pilot participants on the Form 471, funding will go to highest discount applicants first.)*

6. Whether any of the ineligible services and equipment the applicant will purchase with its own resources to support the eligible cybersecurity equipment and services it plans to purchase with Pilot funding will have any ancillary capabilities that will allow it to capture data on cybersecurity threats and attacks, any free or low-cost cybersecurity resources that the applicant will require service providers to include in their bids, and whether the applicant will require its selected service provider(s) to capture and measure cost-effectiveness and cyber awareness/readiness data.
7. A description of the applicant's proposed metrics for the Pilot project, how they align with the applicant's cybersecurity goals, how those metrics will be collected, and whether the applicant is prepared to share and report its cybersecurity metrics as part of the Pilot Program.

# Form 484 – Part 2

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After being selected, Pilot participants must complete Form 484 Part 2 with answers to these questions:

1. Information about correcting known security flaws and conducting routine backups, developing and exercising a cyber incident response plan, and any cybersecurity changes or advancements the participant plans to make outside of the Pilot-funded services and equipment.
2. A description of the Pilot participant's current cybersecurity posture, including how the school or library is currently managing and addressing its current cybersecurity risks through prevention and mitigation tactics.
3. Information about a participant's planned use(s) for other federal, state, or local cybersecurity funding (i.e., funding obtained outside of the Pilot).
4. Information about a participant's history of cybersecurity threats and attacks within a year of the date of its application; the date range of the incident; a description of the unauthorized access; a description of the impact to the K-12 school or library; a description of the vulnerabilities exploited and the techniques used to access the system; and identifying information for each actor responsible for the incident, if known.

# Form 484 – Part 2, cont.

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5. A description of the specific Education Department or CISA cybersecurity best practices recommendations that the participant has implemented or begun to implement.
6. Information about a participant's current cybersecurity training policies and procedures, such as the frequency with which a participant trains its school and library staff and, separately, information about student cyber training sessions, and participation rates.
7. Information about any non-monetary or other challenges a participant may be facing in developing a more robust cybersecurity posture.

Note: We are unsure whether Pilot participants must answer these questions prior to the competitive bidding phase, or whether it can be done concurrently.

# Additional Details

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- As of now, we do not believe ‘who has applied for what’ will be public information
  - Pilot Form 470 and 471 data, however, will be available in Open Data
- As with E-rate, consultants can help you with this process
  - They must have a CRN in your EPC profile.
  - Then you can select up to 3 consultants you wish to be included on your CPP application
  - Why? Privacy of data submitted
- You may select multiple vendors during the Form 470 bidding process
- BEARs/SPI reimbursement forms must be submitted within 90-days after last date to receive service
- Selected participants will be required to submit initial, annual, and final reports
  - Failure to submit these reports may result in a referral to the FCC Enforcement Bureau, a hold on future disbursements, a rescission of committed funds, and/or recovery of disbursed funds

# Get Prepared to Apply

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- Sign up for USAC Cyber Pilot E-mails:  
<https://survey.alchemer.com/s3/7881841/E-Rate-Cyber-Pilot-Program-Email-List>
- Register for and attend USAC webinar on Tuesday, August 20 @ 3:00:  
<https://register.gotowebinar.com/register/8998316741094565212>
- Determine if you want to apply alone or with a consortium
- Consider what equipment and services for which you may want to seek funding
  - Determine needs
  - Evaluate solutions
  - Seek estimated costs
- Draft answers to Form 484 Part 1 Questions
- Review CISA Resources
  - <https://www.cisa.gov/K12Cybersecurity>
  - CISA Report: <https://www.cisa.gov/protecting-our-future-partnering-safeguard-k-12-organizations-cybersecurity-threats>
  - CISA Toolkit: <https://www.cisa.gov/online-toolkit-partnering-safeguard-k-12-organizations-cybersecurity-threats>
- Review US DOE Best Practices and Resources
  - <https://tech.ed.gov/cyberhelp/>



# Cybersecurity Pilot Resources

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- **E-rate PA CPP Page:** [http://e-ratepa.org/?page\\_id=35530](http://e-ratepa.org/?page_id=35530)
- **Julie's Summary of Pilot:** <http://e-ratepa.org/wp-content/uploads/2024/06/Cybersecurity-Pilot-Summary-June-2024.pdf>
- **FCC FAQs:** [http://e-ratepa.org/wp-content/uploads/2024/06/Cybersecurity-pilot-FAQs\\_2024-July-24-2024.pdf](http://e-ratepa.org/wp-content/uploads/2024/06/Cybersecurity-pilot-FAQs_2024-July-24-2024.pdf)
  - More FAQs coming (updates include \*)
- **CPP Eligible Services List:** <https://www.fcc.gov/cybersecurity-pilot/cybersecurity-pilot-eligible-services-list>
- **USAC CPP Webinars:** <https://www.usac.org/e-rate/cybersecurity-pilot-program/learn/webinars/>

# Questions?

