

E-rate Training Workshop for Veteran PA Applicants



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www.e-ratepa.org

Lots to Cover!

- Wrapping Up FY 2023 & FY 2024
- FY 2025 EPC School Profile Updates (known as the “Admin Window”)
- Category 2 Budgets and Where to Research Remaining C2 \$
 - Returning Unused Funds to C2 Budget
- School Bus Wi-Fi
- Off-Campus Wi-Fi Hotspots – new!
- Changes to FY 2025 Form 470
- Reminders/Suggested Timeline
 - EPC Login Errors
- Cybersecurity Pilot Program
- E-rate Looking Glass
- Court Decisions Impacting USF



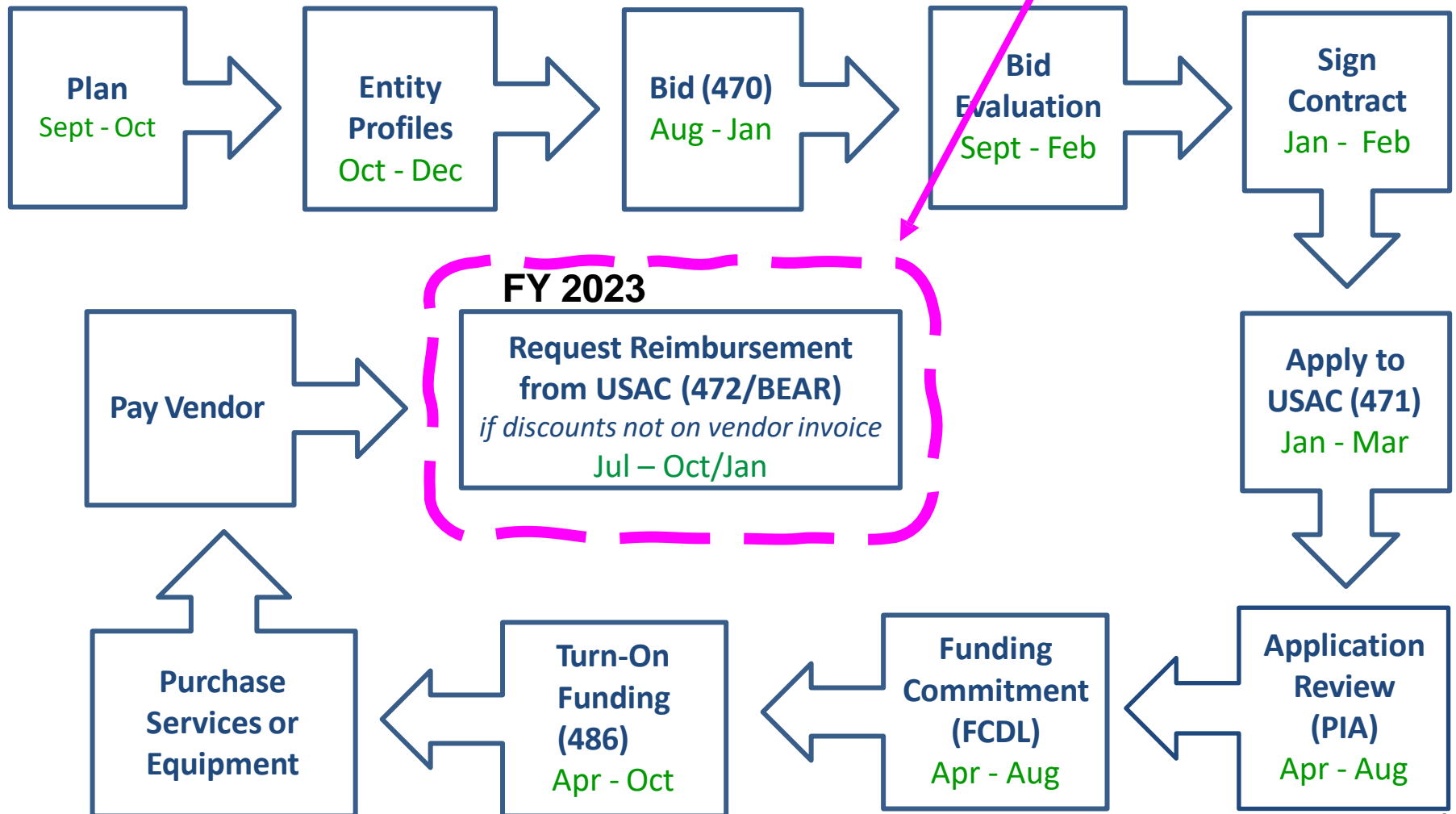
Finishing FY 2023

(July 1, 2023 – June 30, 2024)



The E-rate Cycle

For FY 2023, we are here



BEAR Reimbursement Deadlines



- BEAR Form 472 – Form that must be submitted within 120 days of last date to receive service or equipment
- **For FY 2023 *recurring services***
 - **October 28, 2024** is the invoicing deadline
 - Last date to receive service was June 30, 2024
 - C1 FRNs with *imminent* BEAR deadlines: <https://e-ratepa.org/?p=35701>
- **For FY 2023 *non-recurring purchases***
 - September 30, 2024 was last date to receive/install equipment
 - Jan 28, 2025 is BEAR deadline (*link also contains these FRNs/deadlines*)

Requesting an Invoice Deadline Extension



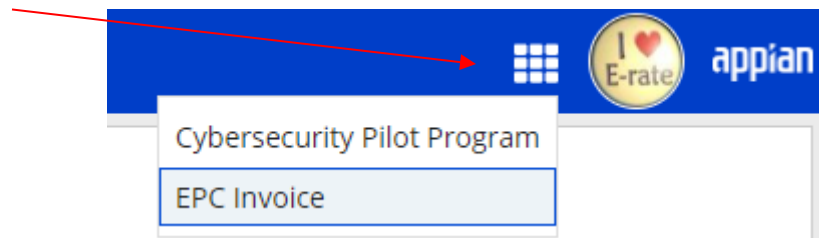
- If you cannot make the BEAR deadline, **OR** if your BEAR was submitted but has not yet been paid, **file for an Invoice Deadline Extension (IDER)**
- IDERs must be requested by the invoice deadline (Oct. 28)
- Extension will be approved automatically for a single, 120-day extension
 - Cannot request a second extension
 - Approvals are shown on the screen and also will be e-mailed
- Invoice Deadline Extension Request Filing Guide at:
<https://e-ratepa.org/wp-content/uploads/2024/10/Guide-to-Requesting-Invoice-Deadline-Extension.pdf>



New BEAR System – Awesome



- On November 7, 2023, USAC migrated E-rate BEAR functionality into EPC
- Now, when you log into EPC, you will see this grid (waffle) symbol in the upper right corner of the Landing Page which will take you to the new E-rate BEAR Portal



- For a new BEAR Filing Guide, visit: <https://e-ratepa.org/wp-content/uploads/2014/03/Form-472-BEAR-Filing-Guide-New-BEAR-July-2024.pdf>
- Must have BEAR access under User Permissions to submit BEAR
 - Existing permission should have been ported over from old system
 - Only EPC AA can grant this access
- You'll see it looks almost identical to the ECF invoicing system

What Changed?



- Error checks
- Can enter multiple FRNs and multiple SPINs on the same BEAR
- Tabs for Submitted Forms, Pending Tasks, Pending Inquiries
- Ability to upload vendor invoices with BEAR
 - Not required, but because USAC often requests these during invoicing review, it's a good idea to upload to save you time later (C2, mainly) and to have a record of it in the EPC system
- Real-time status reports by FRN Line Item in EPC:
 - Incomplete, Certified, Processed, Cancelled
- Ability to see date BEAR was paid
- Better invoicing decision explanations
- **Biggest pitfall remaining is selecting the right funding year so you see the correct FRNs**

New - Invoice Disbursements Data Lookup Tool

- Shows details for all *disbursements* authorized since July 2016
 - Does not show pending invoices

<https://opendata.usac.org/E-Rate/E-Rate-Invoice-Disbursements-Data-Lookup-Tool/t3vg-gfse>

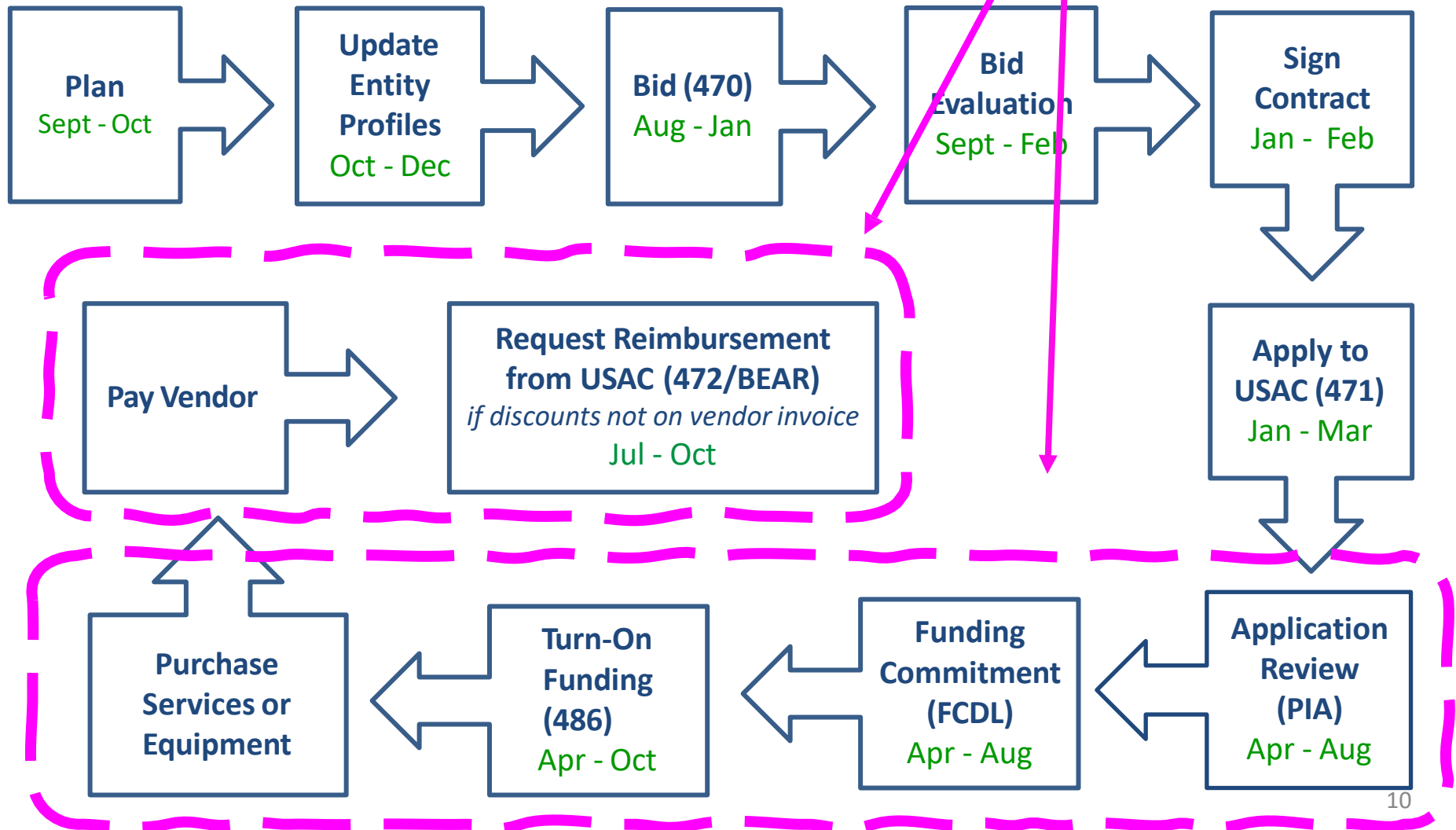
Still Working on FY 2024

(July 1, 2024 – June 30, 2025)



The E-rate Cycle

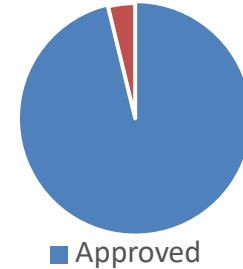
For FY 2024, we are here



Status of PA FY 2024 FCDLs

- 2,022 FRNs submitted
 - \$61.96 million committed thus far
 - \$30.79 funded for Category 2
 - 127 FRNs still “pending” for 23 entities
 - Requesting about \$10 million
 - About 1/4 are for Category 2
 - Reach out to Julie if no PIA contact in last 3 weeks
- Not seeing delays in processing post-commitment requests (SPIN changes, service substitutions, appeals)
 - If you’ve had a post-commitment or BEAR form pending more than 60 days, use Contact Us feature in EPC to request that it be escalated

FRN Status



FY 2024 Sources of Confusion

- FY 2024 Denials:
 - Only 16 FRNs denied (11 small FRNs by same applicant)
 - \$513,000 denied (high \$ due to 1 large dark fiber FRN denial)
 - Denial reasons:
 - Applicant applied for CABIO but didn't qualify
 - Applicant uploaded RFP amendment and didn't extend bid due date
 - Ineligible equipment requested
 - Didn't bid leased dark fiber or self-provisioned fiber correctly on Form 470
 - Posted 470 in wrong category
 - If you have a question, please ask!



FY 2024 Form 486s

- If you have been funded for FY 2024, don't forget to file your Form 486 to “turn-on funding” and certify CIPA compliance
 - 94 PA entities still need to file
 - 486 Due List (as of 10/14) available at: <https://e-ratepa.org/wp-content/uploads/2024/10/Form-486-Due-Dates-FY-2024-as-of-Oct-14.xlsx>
 - **For internal connections, file 486 now (don't wait)**
- You must wait until you receive an FCDL to file the 486
- Deadline is 120 days after FCDL date or October 28, whichever is later
- VERY easy form to file in EPC (no data entry)
 - Guide at: <https://e-ratepa.org/?p=35452>
 - **Be careful when clicking on CIPA certifications**
 - These toggle instead of staying checked!
- If you ever file Form 486 late and USAC modifies your Service Start Date, hence reducing your E-rate commitment, let me know as soon as you file the late Form 486
 - I can help you appeal to restore your \$!

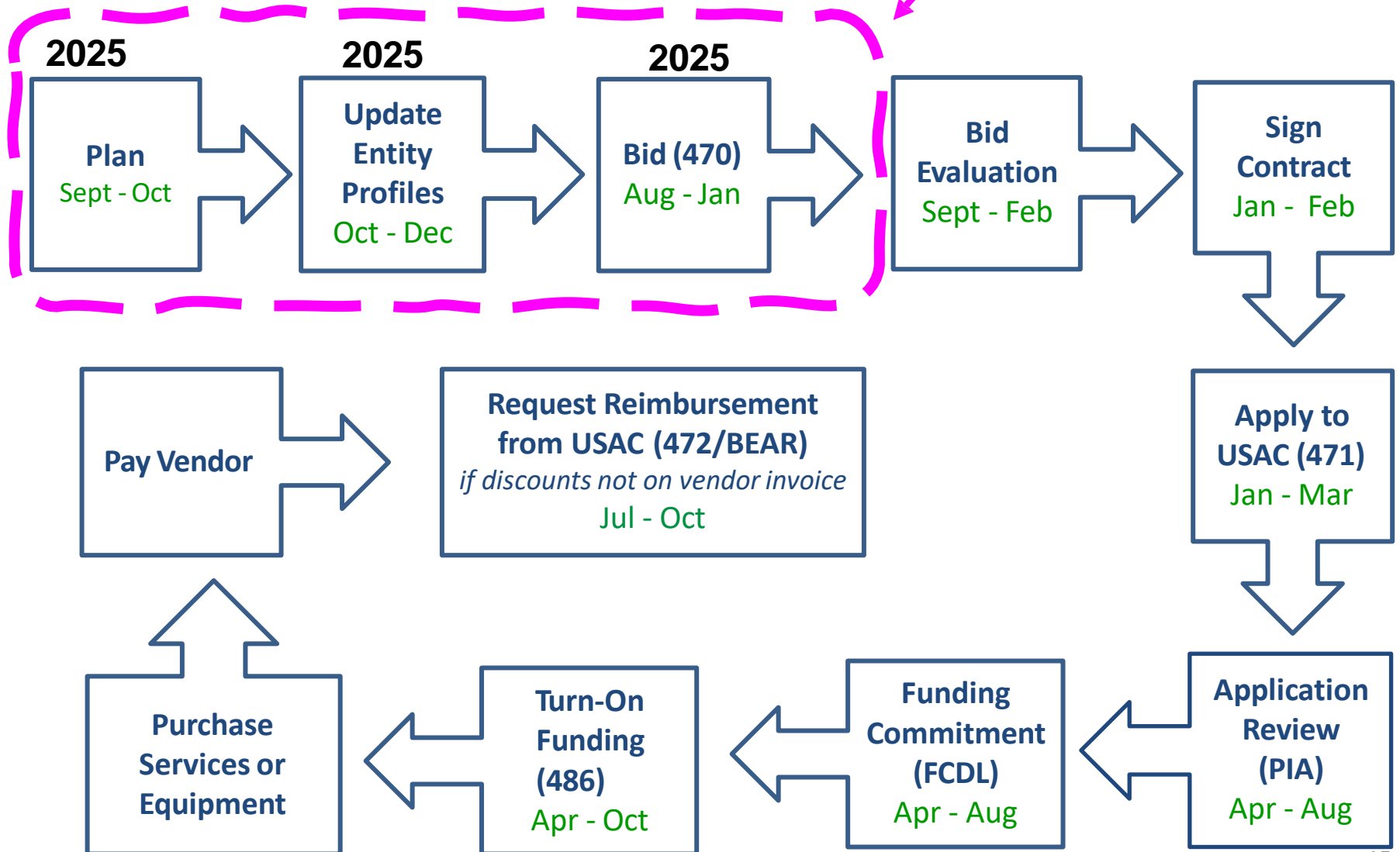


Let's Shift to Funding Year 2025...




The E-rate Cycle

For FY 2025, we are here



FY 2025 “Admin Window”

- Admin Window is 2-3 months *before* the Form 471 window when schools and libraries update their school or library profiles in EPC portal
 - Opened October 15. Usually closes 2 days before Form 471 filing window opens in January
 - This data is then ported over into the Form 471
 - **Mainly used to update:**
 - **E-rate Discounts:** Must update school profiles with current enrollment/NSLP data to calculate E-rate discounts for upcoming year
 - Julie will obtain October 2024 enrollment/NSLP/CEP data from PDE in mid-December and send to listserve
 - **Most schools wait until then to update EPC profiles** ← 
 - **Category 2 Budgets:** Update enrollment (schools) and square footage changes (libraries) – **but ONLY if it will increase Category 2 budget**
 - Category 2 enrollment data can be different from annual discount-rate enrollment data
 - Doesn't have to be updated each year
 - C2 enrollment data entered in separate location in EPC
- >>> **EPC Landing Page > District Name > Manage Organization > Scroll to bottom of page**

Calculating Remaining C2 Budgets

FY 2025 is final year for current C2 Budget Cycle!

How can you see what's your remaining Category 2 Budget for this C2 cycle?

A) Check Julie's List (as of 9/16/2024)- <https://e-ratepa.org/?p=35679>

B) Check USAC Real-Time Data

- 1) Enter BEN to filter just your entity's data
- 2) Summary Table will appear

Filters (2) ✕
Clear All

State

Applicant Type

City

Billed Entity Name

BEN

Consulting Firm Name (CRN)

C2 enrollment currently in EPC

5-Year Pre-Discount C2 Budget

Amount of any "still pending FRNs" in FY 2021, 2022, 2023, 2024

Amount "committed" in FY 2021 - FY 2024

Remaining available C2 Budget

Full Ti...	Library...	School...	Library...	C2 Bud...	C2 Bud...	Funded...	Pendin...	Availab...
1,605		\$167.00		\$268,035.00	Confirmed	\$207,881.00	\$0.00	\$60,154.00



How to Increase Remaining C2 Budget

-- Increased Enrollment or Square Footage

- Because C2 budgets are generally calculated by $\$167 \times$ total school enrollment or $\$4.50 \times$ library square footage, adjusting this data upwards can give you a larger starting C2 budget
 - If your school enrollment or library square footage has **increased**, you should update this data in your EPC profile under Category 2 Budget and then request a C2 Budget Recalculation. > EPC Landing Page > District Name > Manage Organization > Scroll to the bottom of the page.
 - If your enrollment or square footage **decreased**, do nothing as your starting C2 budget cannot decrease.

-- Return Unused Funds

- If you were committed funding in the previous 4 funding years (FY 2021 – 2024), but did not utilize all of the funding, you can cancel the unused portion of the commitment so those funds will be returned to your C2 budget to be used in FY 2025.
 - File Form 500 to either cancel entire unused FRN or reduce quantities of equipment by FRN Line Item
- <https://e-ratepa.org/?p=35679> – Provides more detailed instructions

FY 2025: What Was New is Still New

- **New in FY 2024:**
 - **10% Internet Access Hold Harmless**
 - Up to 10% can be used for ineligible purposes
 - **Library C2 Bidding Exemption**
 - Beginning in FY 2024, libraries are exempt from bidding Category 2 equipment or services if total, pre-discount amount is \$3,600 or less
 - Total cost is per library and cannot be averaged over multiple libraries
 - Contracts still must be signed prior to filing the Form 471
- **School Bus Wi-Fi**
 - Schools can seek C1 funding for school bus wi-fi service and equipment
 - Form 470 now has specific options for both
 - Must create separate requests for equipment/service (both C1)
 - **Eligibility and Filing Guide:** <https://e-ratepa.org/wp-content/uploads/2024/10/School-Bus-Wi-Fi-Eligibility-and-Filing-Guide-1.pdf>
 - **USAC FAQs:** [USAC FAQs: https://www.usac.org/e-rate/learn/faqs/eligible-services/#Bus-Wi-Fi](https://www.usac.org/e-rate/learn/faqs/eligible-services/#Bus-Wi-Fi)
 - **RFP Templates:** <https://e-ratepa.org/?p=35259>

FY 2025: Off-Campus Wi-Fi Hotspots

New for FY 2025: Off-Campus Wi-Fi Hot Spot Lending

- Intended to be loan program for students, staff and library patrons without access to the internet when off-premise
- Bidding required on Form 470 (no exemptions)
 - FY 2025 Form 470 has been updated to include service and equipment options
 - Must request separately
- No students before 1st grade are eligible
- No warehousing of devices – activation required
- Cell phones/multiple use devices not permitted
- Strict non-usage/monitoring/disconnect requirements
- Strict recordkeeping requirements
- Filtering required if using school/library-owned laptops/devices
- Unmet needs documentation not required
- Updates to AUPs required and publicity of hotspot availability required
- Device/plan/budget caps apply...



FY 2025: Off-Campus Wi-Fi Hotspots

- **Cap on Individual Device/Service Plan Costs**
 - \$15/hotspot plan and \$90/hotspot device
- **3-Year Budgets**
 - 3-year, pre-discount combined hotspot/service budget
 - Applicants may request up to 45% of their 3-year budget in a single funding year.
 - First hotspot budget cycle is FY 2025 – FY 2027 (and a new budget cycle will be established beginning in FY 2028)



$$\text{Independent School or District Budget} = \left[\text{student count} \times \frac{20 \text{ hotspots}}{100 \text{ students}} \times \text{C1 discount rate} \right] \times \$630$$

$$\text{Library or Library System Budget} = \left[\text{square feet} \times \frac{5.5 \text{ hotspots}}{1000 \text{ square feet}} \times \text{C1 discount rate} \right] \times \$630$$

Note: The value in the brackets above for both the schools and libraries budgets is rounded up to the nearest ten.

FY 2025: Off-Campus Wi-Fi Hotspots

Additional Resources:

PA Hot Spot Webinar: Thursday, October 17 - 10:00 am Eastern

Register at: <https://cciu.zoom.us/meeting/register/tJ0vdu-qrzMpGtMtTBkHxT0KhPFhvZXTQVr->

USAC Hot-Spot Site: <https://www.usac.org/e-rate/applicant-process/before-you-begin/off-premises-wi-fi-hotspots-summary-overview/>

USAC Graphic: <https://www.usac.org/wp-content/uploads/e-rate/documents/resources/E-Rate-Wifi-Hotspot-Infographic-1.pdf>

USAC FAQs: <https://www.usac.org/e-rate/learn/faqs/eligible-services/#Wi-Fi-Hotspots>



FY 2025: Additional 470 Changes

- **Already discussed:**
 - Addition of School Bus Wi-Fi Options for Equipment and Services
 - Addition of Off-Campus Wi-Fi Hotspot Options for Equipment and Services
- **New:**
 - **Ability to upload RFP document to Form 470 even if no RFP was initially uploaded when the Form 470 was posted**
 - Form will ask if this was a “substantial change” to original Form 470/RFP
 - If Yes, the system will recalculate the Allowable Contract Date and extend for an additional 28 days
 - **Hint: it’s best to always say Yes to this question**
 - **Ability To Cancel Forms 470 and View Canceled Forms**
 - Form 470’s can be cancelled as long as they have not been cited on a committed Form 471
 - Find 470 > Related Actions > Cancel Form 470

Random Topics/Reminders

- **FY 2024 Category 1 Rebid List** sent to listserv this week: <https://e-ratepa.org/?p=35734>
- **Contract Extension Reminder:** If your current contract includes a specific # of voluntary extensions, and you want to exercise one of those extensions, you are not required to post a new Form 470 to use one of the extensions
 - BUT... you **must** have written documentation to the vendor notifying them that you are electing to extend your contract, pursuant to one of the extension terms in your original contract
- **Changes to RFP:** If you issue any changes or clarifications to your RFP (including posting answers to vendor questions), you must extend the bid due date by another 28 days
 - **Build in a vendor question due date to your RFP timeline and then add 2 weeks to your bid due date (for a total of about 6.5 weeks total)**
- **Labeling** - When receiving equipment, be sure to label each piece and record in asset inventory
 - Make/model/serial number/building/room/FRN/date installed
 - Sample: <http://e-ratepa.org/wp-content/uploads/2014/03/Asset-Register-Sample.xlsx>



TIP!

Random Topics/Reminders

- **PEPPM mini-bid reminder**

- Can issue mini-bid solicitations to vendors now
- Same Form 470 #, BUT
- Always use updated vendor list: http://e-ratepa.org/?page_id=6121
 - Vendor contacts and authorized resellers change frequently
 - Keep downloaded list for document retention



- **EPC Log-In Error – “AuthSDKError: Unable to parse a token from the URL”**

- If you receive this, try these fixes:
 - Function F5
 - <https://portal.usac.org>
 - Will not make you login again
 - Clear cache

FY 2025 Application Timeline



- Recommended timeline:
 - November: File Form 470s by Thanksgiving
 - Vendor questions due 2 weeks later
 - Upload answers to 470 posting
 - End of December/Early January: Vendor bids submitted
 - 29 days after uploading answers to vendor questions
 - Mid-December: Update EPC profiles after Julie sends updated data
 - January: Bid evaluation, board agenda submission
 - February: School board approval, sign contracts
 - February/March: File Form 471
- **Form 470s being accepted in EPC NOW**
 - Don't wait until January to file 470s!

Cybersecurity Pilot Program (CPP)

- FCC adopted \$200 million Cybersecurity Pilot Program in June 2024
- Is a 1-time, competitive program
 - If selected, E-rate discounts will apply
 - Bidding/application/reimbursement process as the E-rate program
 - Applicants can request 3-years' worth of funding, subject to funding caps
 - Schools - \$40.80/student (\$45k floor, \$4.5 cap)
 - Libraries - \$45k/library (\$450k cap for system)
- 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
- Must agree to participate in detailed data gathering initiative
- Must participate for full three years – or risk having to return funds

Cybersecurity Pilot Program (CPP)

- **Four categories of eligible equipment/services:**
 - Advanced/Next Generation Firewalls
 - Endpoint Protection
 - Identity Protection and Authentication
 - Monitoring, Detection, and Response
- **CPP Eligible Services List:** <https://www.fcc.gov/cybersecurity-pilot/cybersecurity-pilot-eligible-services-list>
- **General process:**
 - Form 484 Part 1 – General questions – Due by November 1, 2024
 - FCC selects Pilot participants and announces in public notice
 - If selected, *then*:
 - Form 470 bidding (min 28 days)
 - Vendor contract signing
 - Form 471 to request funding
 - Form 484 Part 2 – Detailed questions
 - Will be done concurrently with Form 471
 - USAC sends FCDL
 - Equipment/Services purchased
 - Reimbursement forms submitted (BEAR or SPI)

E-rate Looking Glass...

- Bidding Portal?
 - No action on this as of now
- E-rate disbursements via SAM.gov?
 - Appears to be on hold for now
 - Get SAM.gov account now if you don't already have one
 - Most public schools do
- E-rate simplification?
 - Has traction, but 5th circuit decision may be delaying approval
 - Possible changes?
 - Moving some services from BMIC to IC beginning in FY2025
 - Guidance on Transition of Services
 - A grace period for applicants/SPs to file the one-time 120-day invoicing extension or refile a denied/partially invoice after the invoice deadline

Court Rulings Impacting E-rate



- **Appeal Court Declares USF is Unconstitutional**
- On July 24, 2024, the U.S. Circuit Court of Appeals for the 5th Circuit [ruled](#) that the current Universal Service Fund mechanism is unconstitutional
 - This decision created a split amount the courts because the 6th and 11th Circuit Courts previously deemed USF is constitutional in nearly identical cases brought by the same petitioners last year
- On 9/30/2024, the FCC submitted its [petition](#) to the Supreme Court to review the 5th circuit's decision to invalidate the USF
- Should the Supreme Court take the case and ultimately side with the 5th Circuit over the other two appellate court decisions, legal analysts believe the Court would likely give the FCC or Congress time to modify the USF mechanism to comply with their decision
- [For now, the existing E-rate program remains in effect and the flow of E-rate reimbursements is not impacted.](#)
- **Chevron Doctrine Overturned**
 - Chevron Doctrine allowed federal agencies to draft rules based on an agency's interpretations of the statutes, especially when the statutory language is general or vague.
 - The E-rate statutory language is fairly general.
 - In June 2024, SCOTUS overturned the Chevron doctrine.

Questions?

E-rate Help!

- E-rate: USAC's Client Service Bureau (CSB)
 - Call **888-203-8100**
 - Submit a 'Customer Service Case' in EPC
- PA E-rate Coordinator
 - E-mail jtschell@comcast.net
 - www.e-ratepa.org
 - **Helpful Documents:** http://e-ratepa.org/?page_id=754
 - **Training:** http://e-ratepa.org/?page_id=745

