

E-rate 2024 Workshop 3: PIA Review, Form 486, and Invoicing

Massachusetts Board of Library
Commissioners
April 25, 2024

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Before We Start...

- Slides/Updates:
 - Accurate to the best of our knowledge as of 4/24/2024) but...expect more changes
- Most updates are in SLD's News Brief issued generally monthly
 - Subscribe or view online on SLD web site (<https://www.usac.org/e-rate/learn/news-brief/>)
- Basic training videos available online at in USAC's Learn page at <https://www.usac.org/e-rate/learn/>

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Before We Start...

- Questions are welcome!
 - Goal to is make session as useful as possible to you
 - Please save your questions until the end of the presentation
 - Please try to note slide #'s if you have a question about them
 - Q&A at end of session for as long as you need it

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Quick Webinar Preview

- Quick Program Overview
- PIA Review
- Form 486
- Invoicing
- Common Issues and Remedies
- ECF Update/Reminder

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Quick Program Overview

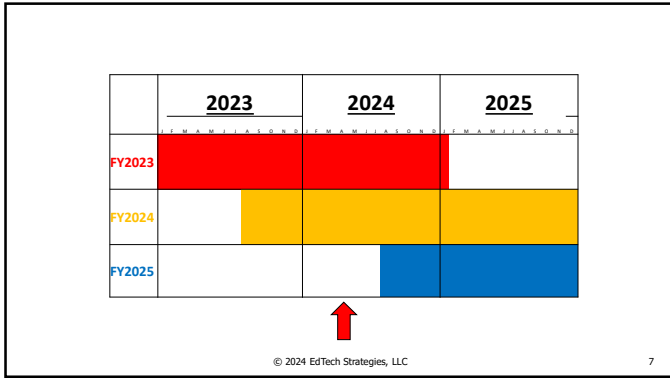
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Application Steps and Deadlines

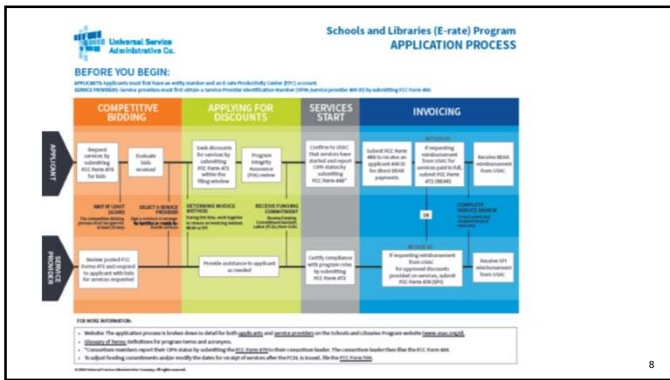
- E-rate requires annual applications
- Funding years mostly don't overlap, but application processes do
- Important to remember where you are in the process for each funding year

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Application Steps and Deadlines

- Dates are somewhat flexible (but deadlines are not)
- Procurement/competitive bidding: Fall and early Winter prior to the Funding Year (includes Form 470)
- Contract Award and Form 471: ~Jan – Mar prior to the Funding Year
- PIA Review: ~Spring prior to/Summer of Funding Year
- Form 486: ~Summer/early Fall of Funding Year
- Invoicing: either during or ~Summer/Fall after Funding Year

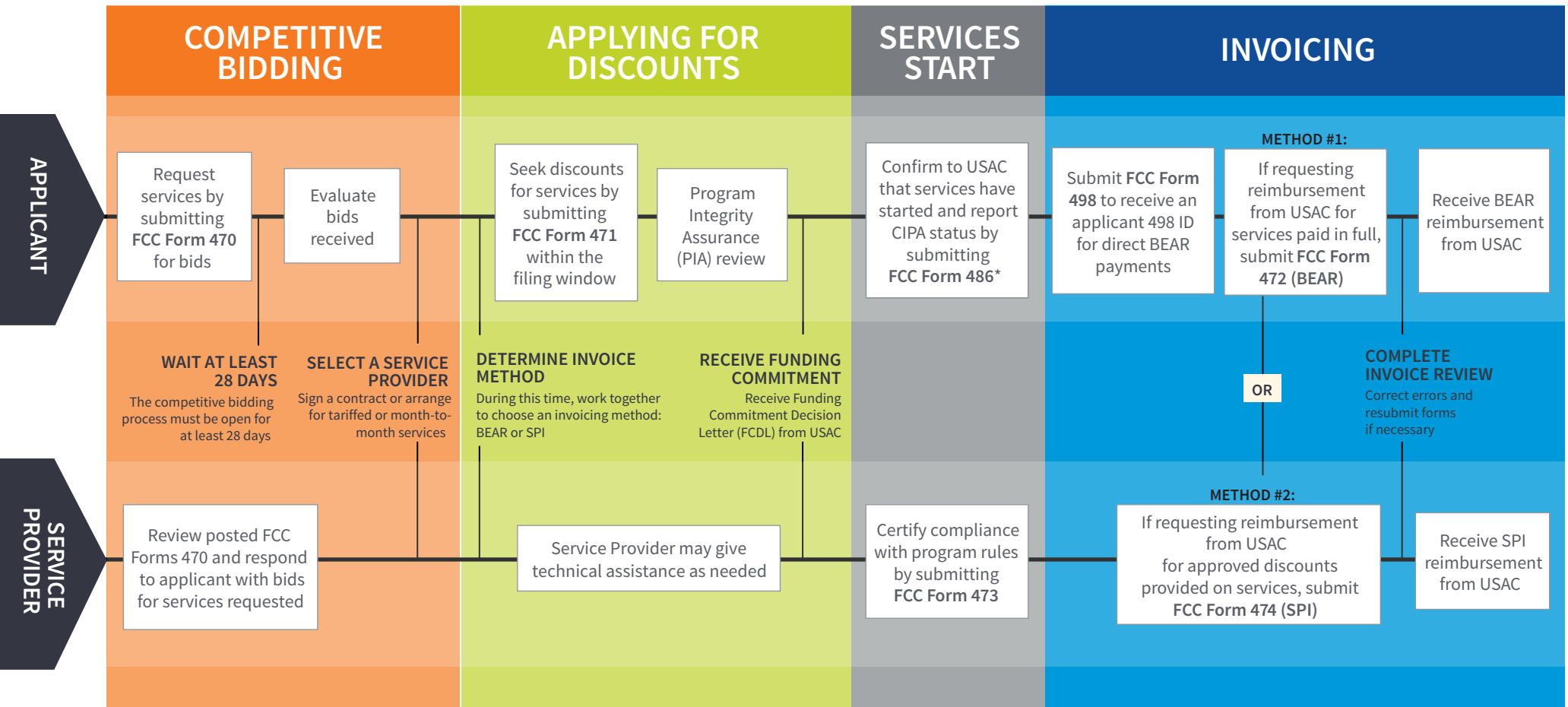
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BEFORE YOU BEGIN:

APPLICANTS: Applicants must first have an entity number and an E-Rate Productivity Center (EPC) account.

SERVICE PROVIDERS: Service providers must first obtain a Service Provider Identification Number (SPIN /service provider 498 ID) by submitting FCC Form 498.



FOR MORE INFORMATION:

- Website: The application process is broken down in detail for both applicants and service providers on the Schools and Libraries Program website (www.usac.org/sl).
- Glossary of Terms: Definitions for program terms and acronyms.
- *Consortium members report their CIPA status by submitting the FCC Form 479 to their consortium leader. The consortium leader then files the FCC Form 486.
- To adjust funding commitments and/or modify the dates for receipt of services after the FCDL is issued, file the FCC Form 500.

Application Steps and Deadlines: PIA Review

- **Program Integrity Assurance (PIA)** review takes place after the Form 471 has been filed
 - Goal is to review and process Form 471 in order to make award
 - PIA review can happen immediately after filing or months after filing, can be intensive or no questions at all
 - Critical to monitor e-mail or EPC to know when questions are posed (and be sure they're not missed) due to strict deadlines

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Application Steps and Deadlines: Form 486

- Form 486 filed within 120 days of start of service or 120 days of receipt of Funding Commitment Decision Letter, whichever is later
 - Filing late will progressively cost you funding
- Allows invoicing to start and includes CIPA certification

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Application Steps and Deadlines: Invoicing

- Invoicing can take place during or immediately after Funding Year
 - Must be completed in a timely fashion or you forfeit the funding
- Can be done by vendor or applicant
- **Invoicing (and invoicing review) now happens in EPC... (sort of)**

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Application Steps and Deadlines: Audits

- Audits typically take place after the fact
- Many different kinds of audits with different levels of detail
 - Critical to keep all your documentation to demonstrate compliance

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E-rate Program: Different Roles

- Role of Consultants
 - *Your* consultants can:
 - Help you with your application, including filing
 - Answer PIA review questions for you
 - Assist you with every step
 - *Your* consultants should not:
 - Conduct your procurement or evaluation
 - File applications without your active input
 - Undertake actions without your knowledge and assent

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E-rate Program: Different Roles

- Roles of Library Staff
 - E-rate cuts across three main areas of responsibility:
 - Technology
 - Business/Financial/Operations
 - Executive
 - Different libraries divide responsibilities differently
 - Critical to keep all levels involved/informed

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E-rate Program: EPC

- E-rate Productivity Center
 - portal.usac.org
 - Everyone involved in your E-rate process should have an account
 - Account setup is a somewhat unusual multistep process
 - Can work with you individually

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PIA Review

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PIA Review

- Program Integrity Assurance review designed to ensure compliance with program rules
- All PIA review is done through EPC
 - Notification *should* come via email with a link to go directly to the PIA question area
 - Good to check EPC regularly just in case
 - Questions/responses all in EPC

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PIA Review

- PIA review varies widely
 - Some applications get no questions at all while others get many
 - Questions can be extremely general or extremely specific
 - Goal is to ensure compliance with program rules -- it's important to understand the rules behind the questions since the questions are often misleading
 - Can be used to make allowable corrections to the forms

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PIA Review

- PIA review varies widely (cont'd)
 - All questions are on a timer (typically 15 days)
 - Some follow up questions have drastically shorter timers
 - Critical to answer questions before timer runs out
 - Can always request extensions
 - Generally unanswered questions result in applications being denied
 - Libraries CAN work with vendors to answer the questions

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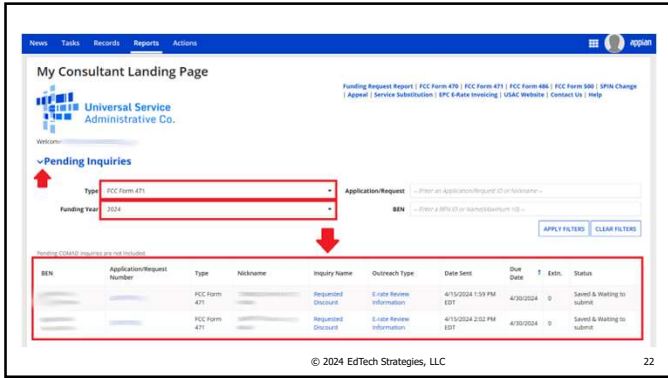
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PIA Review

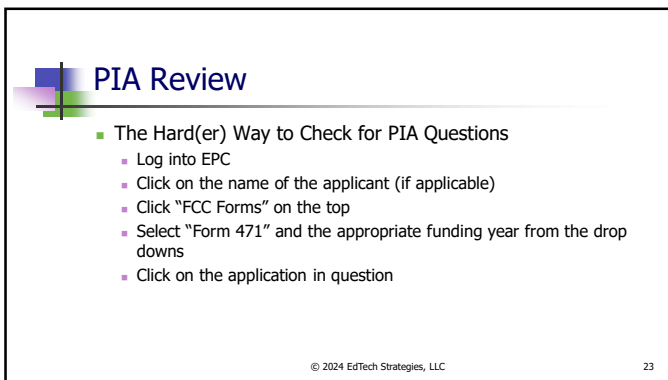
- Three ways to check for PIA questions:
 - Easy Way: follow link in email
 - Less Easy Way:
 - Log into EPC
 - Select "Form 471" for the "Type" and "2024" for the Funding Year under "Pending Inquiries"
 - Click "Apply Filters"
 - If there are any requests, they will show in the list between "Pending Inquiries" and "Notifications"
 - Click on the "Inquiry Name"

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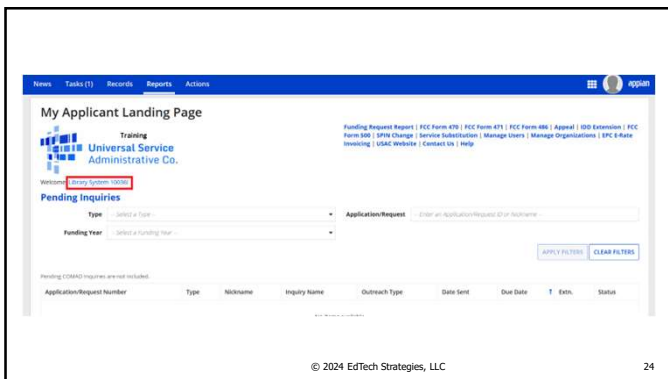
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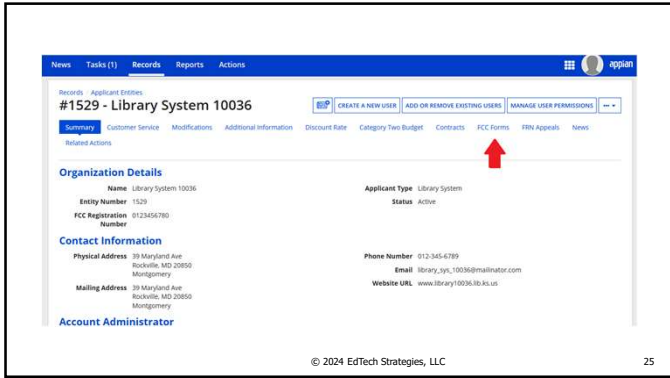
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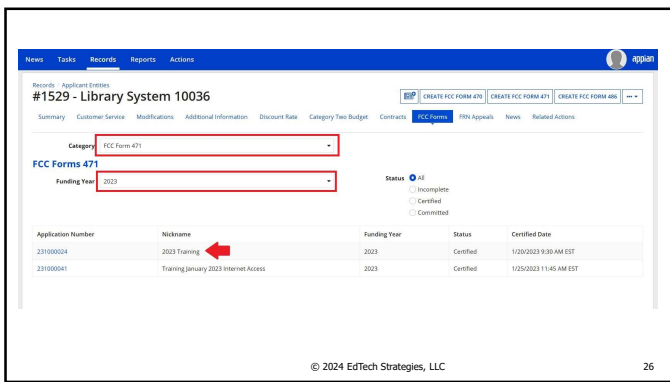
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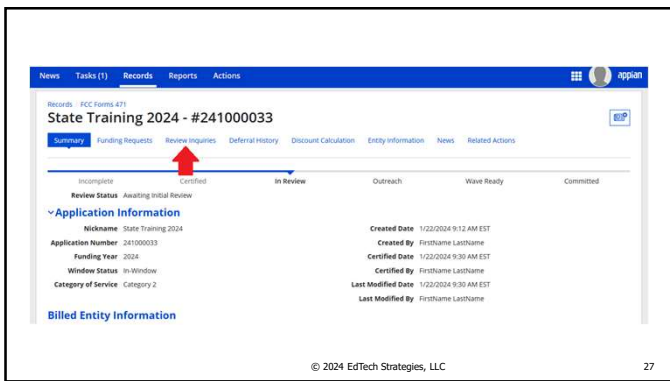
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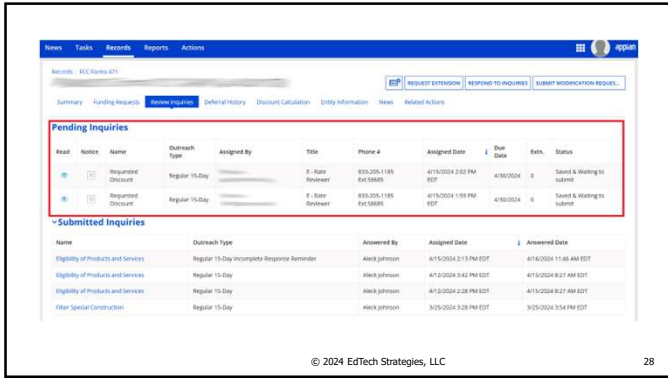
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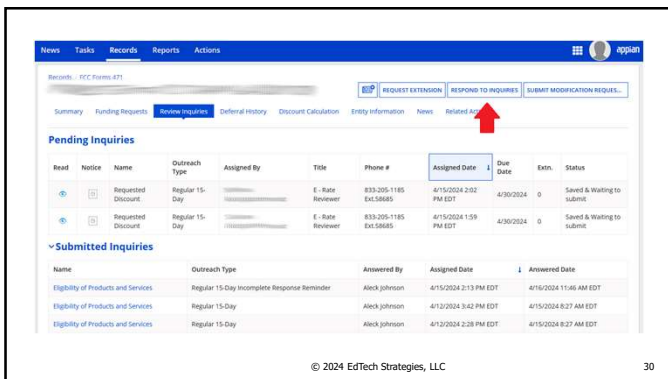


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PIA Review

- Responding to PIA Inquiries:
 - If you have inquiries listed, click on "Respond to Inquiries" at the top
 - Then click on the "Name" of the individual inquiry to get the questions asked
 - You can save responses without submitting them by hitting "Save" rather than "Submit"
 - You can also request extensions using the "Request Extension" button at the top of the page

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PIA Review

- Common C2 Questions/Modifications
 - C2 Budget allocation
 - Square footage
 - Explanation of Costs (even if in contract) – make, model, quantity
 - Modification of eligibility percentages
 - Modification of type of service (IC, BMIC)
 - Modification of the classification (switch/transceiver/module)
 - Discount Calculation

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Common PIA Review Issues

- Failure of applicant to respond to PIA inquiries
- Failure of PIA reviewer to understand applicant responses
- PIA incorrectly modifies applications
 - Changing category of service
 - Changing quantities/amounts...often changed with just a notification and minimal time to respond

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PIA Review Gotchas

- Be sure to answer all PIA questions
 - Even the "if yes, then..." when your answer is "no."
- Be sure to submit your PIA response (bottom right)
- Request extension if you need it
- Email erate@mbic.state.ma.us or your coordinator (me or Kate) for help if you are unclear on what is being requested
 - Questions often poorly worded, so make sure you understand the real question behind the question!

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Post PIA Review

- USAC will issue the Form 471 Funding Commitment Decision Letter (FCDL)
 - In order to get the details, needs to the "generated" within EPC by the user
 - Will then be linked in "News" and under "Notifications"
 - Two parts – announcement (PDF) and spreadsheet (XLS)
 - Keep these for your records!
 - If everything is correct, applicant can file the Form 486
 - If errors, appeal to USAC within 60 days

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Form 486

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Form 486

- Form 486 is available in EPC from:
 - Landing Page (at top right, either at top level or under drop down)
 - under "Related Actions" and "Create FCC Form 486" from within Applicant profile page
- What Form 486 Does:
 - Confirms receipt of services
 - Confirms compliance with CIPA
 - Allows invoices to be filed

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486 Sidebar: Understanding CIPA

- When does CIPA apply?
 - When library-owned computers access E-rate supported services or equipment, the library-owned computers must be CIPA compliant
- Components of CIPA:
 - Internet Safety Policy
 - Technology Protection Measure
 - Public Notice and Hearing (or Meeting)

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486 Sidebar: Understanding CIPA

- Internet Safety Policy must address:
 - Access by minors to inappropriate content
 - Safety and security of minors when using email, chat rooms, etc.
 - Unauthorized access – hacking, etc. – by minors
 - Unauthorized disclosure, use, and dissemination of personal information by minors
 - Measures designed to restrict minors' access to material deemed harmful to minors (filter)

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486 Sidebar: Understanding CIPA

- Technology Protection Measure
 - Must be installed and active
 - No requirements about restrictiveness or effectiveness beyond "restrict minors' access to material deemed harmful to minors"
 - Applies to "its computers" (library computers)
 - Does not apply to library user-owned computers

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486 Sidebar: Understanding CIPA

- Public Notice and Hearing
 - Library must have a meeting open to the public to discuss the Internet Safety Policy and Technology Protection Measure
 - Must be some form of public advertisement of the meeting
 - Typically website or local paper
 - Must be some record of the meeting
 - Typically minutes or other notes

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486 Sidebar: Understanding CIPA

- CIPA and Audits
 - Must be able to document compliance:
 - Internet Safety Policy
 - Copy of policy
 - Technology Protection Measure
 - Logs or other evidence
 - Public Notice and Hearing (or Meeting)
 - Advertisement, website, minutes, newspaper reports, etc.

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Invoicing: The Choice is Yours

- Invoicing mode: BEAR or SPI?
 - Applicants determine
 - Technically must indicate prior to filing 471
 - Best practice: indicate in the Form 470 and/or RFP
 - Different implications based on invoicing mode
 - Who is responsible for:
 - Documentation?
 - Accuracy?
 - All charges for FRN must have same invoicing mode

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BEAR System Update

- BEAR is now available within the EPC portal (sort of)
 - No longer need separate authentication and login for BEAR
 - Not integrated in terms of look and feel or location
 - New BEAR requires users to have the appropriate permissions within EPC

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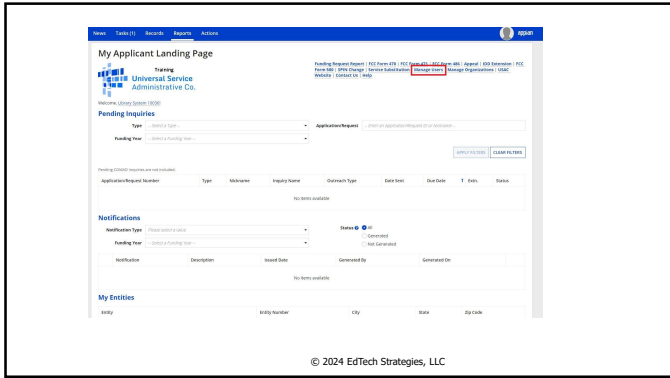
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Rights Changes in EPC

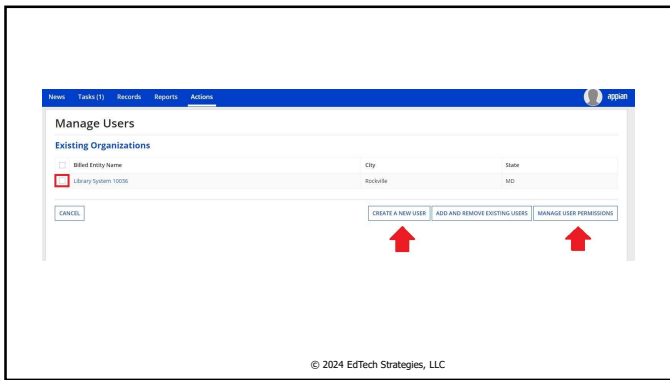
- In order to access the new BEAR, users must be given the appropriate permissions in EPC
- Only "account administrator" has the rights to assign permissions for users at a library

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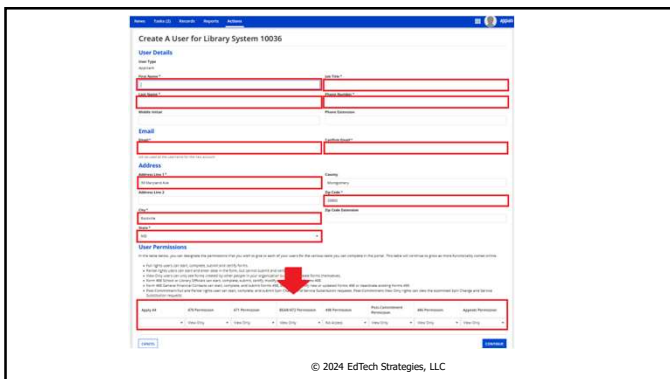
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Invoicing Dashboard

FCC Form 472

OMB Number: 3060-0856 Form 472

Basic Information Invoice Line Item Summary Preview Certify Form 472

Independent School 703 (BEN: 24738)

Billed Entity Information

Independent School 703 Billed Entity Number: 24738
 1112 East Ave FCC Registration Number: 2234567890 Applicant Type: School
 Queen, VA 18634

111-111-1112

Invoice Nickname

Please enter an invoice nickname here.*

Are you the main contact person?
 YES NO

DISCARD FORM SAVE & CONTINUE

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Invoicing Dashboard

FCC Form 472

OMB Number: 3060-0856 Form 472

Basic Information Invoice Line Item Summary Preview Certify Form 472

Independent School 703 (BEN: 24738) - State Training 2024 - #BEAR202400016

Invoice Line Item

Invoice Line Item Number FCC Form 471 Application Number Funding Request Number (FRN) Billing Frequency (FRN)

No items available

+ ADD LINE ITEM / EDIT LINE ITEM / REMOVE LINE ITEM

BACK DISCARD FORM SAVE & CONTINUE

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Invoicing Dashboard

FCC Form 472

OMB Number: 3060-0856 Form 472

Basic Information Invoice Line Item Summary Preview Certify Form 472

Independent School 703 (BEN: 24738) - State Training 2024 - #BEAR202400016

Invoice Line Item

Select Funding Year: 2022 Funding Request Number (FRN):

Select FRN

Please select a row to auto-populate the form details below.

FCC Form 471 Application Number	Funding Request Number (FRN)	Funding Request Nickname	Funding Request Amount	Service Provider Identification Number(SPIN)	Service Provider Name	Discount Rate
221000339	229000421	FRN13_DT_P1_and_P2_Tariff	\$1,324,80	14010001	USAC Service Provider Organization 1	90%
221000339	229000419	FRN12_DT_P1_and_P2_Tariff	\$1,324,80	14010001	USAC Service Provider Organization 1	90%
	FRN11_DT_P1_and_P3				USAC Service	

DISCARD FORM SAVE & CONTINUE

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Invoicing: SPI Forms

- SPIs are filed by the service provider
 - Must be filed after service provider has invoiced applicant for discounted amount
 - Applicants never see SPIs – cannot verify accuracy of invoices
 - ... but may be responsible in an audit for SP errors

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Invoicing Deadlines

- Invoice deadlines
 - Generally 120 days after last date to receive service
 - For FY2023 Category 1 deadline is: **10/28/2024**
 - For FY2023 Category 2: usually latest is **1/28/2025** (but depends on contract – could be earlier!)
 - No more pandemic automatic extensions
 - Invoice deadline can be extended...
 - ... but extension **must** be requested before deadline

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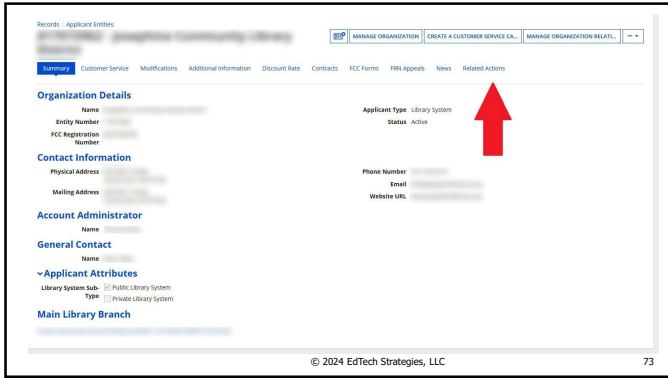
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Invoice Deadline Extension Request (IDER)

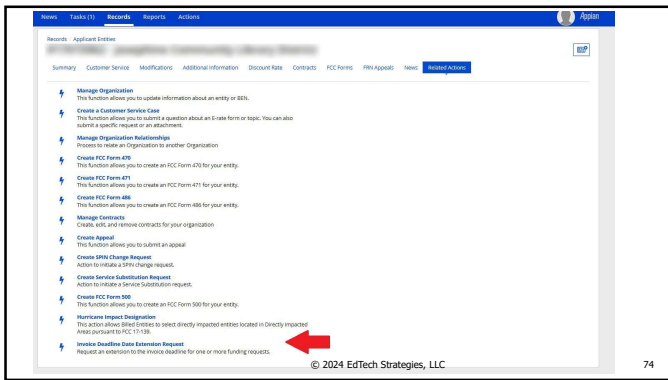
- FY2015 and prior can be filed in BEAR portal
- FY2016 onwards requires EPC account with appropriate rights
 - In EPC, log in and click on your entity name...

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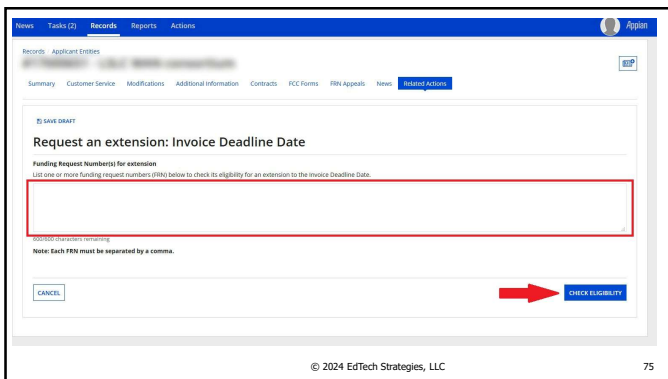
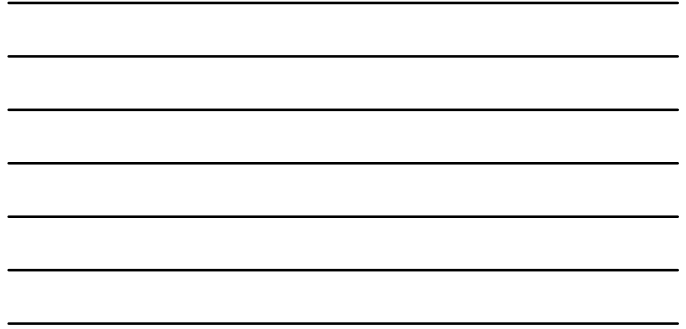
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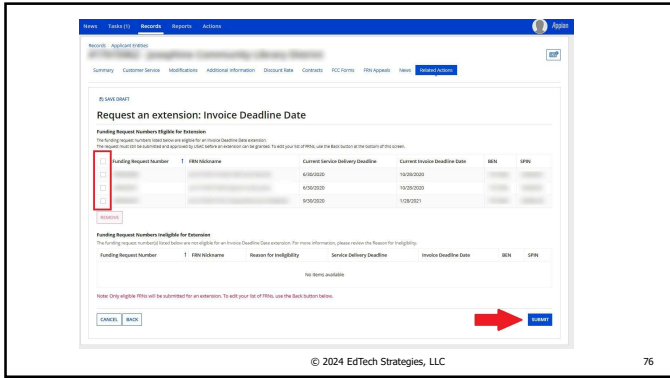


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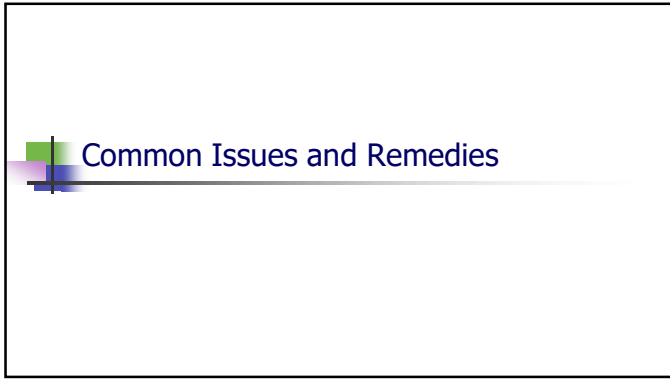


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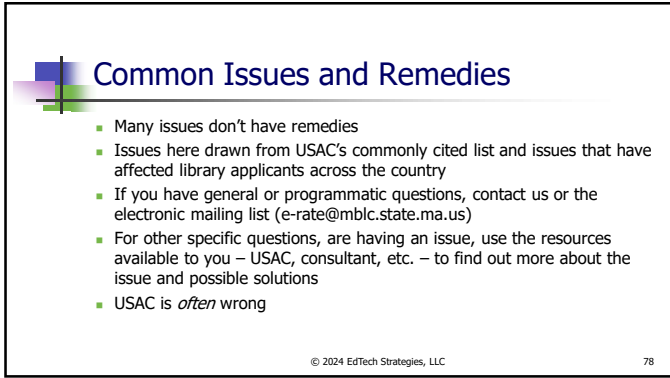




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Common Issues: Procurement

- Failure to list the proper Form 470
 - Remedy: change the Form 470 to the correct one
- Failure to do appropriate competitive bidding
 - Remedy: provide documentation showing proper procurement was done, or restart procurement/competitive bidding process (*if there is time*)
- Remember, procurement issues are the hardest ones to fix

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Common Issues: Application Review

- Unable to reach/no response from applicant during PIA review
 - Remedy: ensure that contact info on application is valid, list applicant on forms as contact, and include alternative contact info
- Category 2 Budget Exceeded
 - Remedy: work with reviewer to remove Category 2 items until the total pre-discount amount of the funding request is below the C2 budget. Make sure your vendor is also aware if doing SPI invoices!
- Funding Commitment reduced due to ineligible services
 - Remedy: ensure that all ineligible services are cost allocated out of the funding requests prior to filing Form 471. Appeal if USAC data is incorrect
- Funding commitment reduced due to missing documentation
 - Remedy: supply the requested documentation

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Common Issues: Application Review

- Services delivered outside funding year
 - Remedy: ensure services are delivered during eligible funding year period. If necessary, appeal to USAC
- Ineligible entities removed
 - Remedy: ensure that ineligible entities are cost allocated from the application. If entities are actually eligible, appeal to USAC
- No invoice filed or invoice filed late
 - Remedy: ensure invoice is filed prior to deadline, deadline extension is requested, and/or appeal to USAC
- Missing information in profile
 - Remedy: update profile information (address, sq. footage, locale code)

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Final Thoughts

- Watch the e-rate@mbic.state.ma.us list and Newsbrief for updates and clarifications
- Sketch out your timelines and make any necessary changes vis-à-vis invoicing
- Don't be afraid to ask questions!
 - Ask us on e-rate@mbic.state.ma.us – we love your questions!
 - CSB: 888-203-8100 or in EPC (under Actions "select", "Contact Us" to get answers from USAC)
- Make sure you stay in control of and monitor your applications
- Take advantage of E-rate if it can help you!

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Questions?



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