

Emergency Connectivity Fund Program Newsletter

April 19, 2022

The third Emergency Connectivity Fund (ECF) Program application filing window will open on Thursday, April 28, 2022 and close on Friday, May 13, 2022, at 11:59 p.m. ET. During the third window, eligible schools and libraries will be able to request ECF Program support for eligible equipment and up to 12 months of services that will be received or delivered between July 1, 2022 and December 31, 2023 for off-campus use by students, school staff, and library patrons with unmet needs. Please see the Public Notice (DA 22-309) for additional information about the third application filing window, the service delivery date, and invoice filing deadline applicable to equipment, other non-recurring service, and recurring service requests submitted during this filing window. Please also note that the ECF Open Data Set and Tool will not show window 3 data until after the window has closed.

Upcoming Office Hours

USAC will host a series of ECF Webinars and Office Hours sessions where applicants and service providers can ask questions about the third application filing window and receive information about the ECF Program. Register for these events at the below links:

- Tuesday, April 26 @ 3 p.m. ET: ECF Window 3 Information Session Register
- Tuesday, May 3 @ 3 p.m. ET: ECF Window 3 Office Hours Register
- Tuesday, May 10 @ 3 p.m. ET: ECF Window 3 Office Hours Register

Visit the Training section of the ECF Program website to access e-learning modules, register for webinars and office hour sessions, and view recordings of past trainings and office hour sessions.

SAM.gov Transition From DUNS to UEI

On April 6, 2022, the FCC released Public Notice DA 22-371 which announces the transition from the Data Universal Numbering System (DUNS) number to the Unique Entity Identifier (UEI). At this time, only entities that receive direct payments or disbursements from the FCC must obtain a UEI and complete full entity registration in SAM.gov, including for the ECF Program. Most organizations who participate and receive payments in the ECF Program should have already registered with SAM.gov. If you are submitting requests for reimbursement for the ECF Program, you are required to register in SAM.gov and already

have a UEI. No further action is required; USAC will reach out directly to these ECF participants if needed. If you will be submitting requests for reimbursement for the ECF Program and have not completed your registration in SAM.gov, you should do so now.

If you need help obtaining a UEI or have additional questions, please visit the Contact USAC page to contact USAC's Customer Service Center for the ECF Program.

Key Reminders

Out-of-Window Applications – Please note that in preparation for the third filing window, any ECF FCC Forms 471 submitted and certified after the close of the second application filing window are placed in out-of-window status and will not be reviewed by USAC without a waiver from the FCC. The ECF Portal will no longer accept window 2 out-of-window applications on April 22, 2022 and any uncertified out-of-window applications will be cancelled after this date.

Frequently Asked Questions

Can a school or library submit an application in the third application filing window to continue services that were funded through a first or second window funding request?

Yes, provided they are not requesting duplicative funding for services that are committed and were or will be funded through the applicant's first or second window funding requests. To avoid duplicative support and expedite the review of the third filing window applications, applicants should include in the narrative section of the ECF FCC Form 471 application, information regarding services funded through first or second window requests, including the ECF FCC Form 471 application number(s) and the service end date(s) for these services that will be funded through the first or second window funding commitment, as well as the up to 12 months of new services being requested during the third application filing window. For example, an applicant received a funding commitment decision letter on December 31, 2022 for 12 months of recurring services for its second window application. If the applicant starts the recurring service on January 1, 2022 (because they were waiting to receive a FCDL before starting services), the applicant would provide information about this application and FRN, as well as the service start and end dates of January 1, 2022 through December 31, 2022 in the narrative section of their third filing window ECF FCC Form 471. The applicant could also request support for the continuation of this recurring service from January 1, 2023 through December 31, 2023 on its third filing window ECF FCC Form 471 and note in the narrative that these are the service and end dates for the third filing window request for services.

Can we request funding for service for all 18 months of the relevant funding period for the third application filing window?

No. Applicants may only request support for a maximum of 12 months of eligible services during the third application filing window that covers eligible equipment and services received or delivered between July 1, 2022 and December 31, 2023. On the ECF FCC Form 471, an applicant should provide the service start

and end dates for the 12 months of service that will be requested during that funding period.

What is the deadline for filing for reimbursement for funding requests submitted during the third application filing window?

On March 23, 2022, the Bureau established December 31, 2023 as the service delivery date for all requests for equipment, other non-recurring services, and recurring services submitted in the third application filing window. Therefore, the invoice filing deadline for these third window ECF funding requests is 60 days from the later of the following dates:

- The date of the funding commitment decision letter (FCDL);
- The date of a revised funding commitment decision letter (RFCDL) approving a post-commitment change or a successful appeal of previously denied or reduced funding; or
- The service delivery date of December 31, 2023.

This also means that all of these funding requests have an invoice filing deadline of February 29, 2024, unless the FCDL is issued after December 31, 2023 or the RFCDL is still pending.

Please see DA 22-309 for additional information about the service delivery date applicable to third window ECF funding requests. The modified service delivery date rule (section 54.1711(e)) became effective on April 4, 2022.

What must applicants or service providers, who agree to invoice on behalf of applicants, do to be compliant with the non-usage certification?

The FCC declined to adopt specific non-usage rules for the ECF Program. Instead, applicants and service providers are required to certify on the request for reimbursement that they are not willfully or knowingly requesting reimbursement for services and equipment that are not being used. While the ECF Program only funds equipment and services that are in use, there may be certain circumstances (e.g., during a school's winter and summer breaks or sick days) where the services are still eligible for ECF support. ECF participants should take reasonable actions to monitor and track the usage of equipment and services that are purchased and used through the ECF Program. For example, the Report and Order suggested that applicants could ask their service providers to provide monthly reports or other information on data use as one way to comply with the certification. ECF participants can take other reasonable steps, such as ensuring a hotspot device is activated. ECF participants should be prepared to explain what actions were taken, if asked how they complied with the non-usage certification during an audit or other post-commitment review.

What is the extended service delivery date and invoicing deadline for funding requests submitted during the first and second application filing windows?

Per the FCC's February 22, 2022 Order DA 22-176, the service delivery date for ECF Program requests for equipment, other non-recurring services, and recurring services submitted during the first and second

application filing windows was extended from June 30, 2022 to June 30, 2023. Based on this Order, the invoice filing deadline is now 60 days from the later of the following dates:

- The date of the Funding Commitment Decision Letter (FCDL);
- The date of a Revised Funding Commitment Decision Letter (RFCDL) approving a postcommitment change or a successful appeal of previously denied or reduced funding; or
- The service delivery date of June 30, 2023.

This also means that these funding requests have an invoice filing deadline of August 29, 2023, unless the FCDL is issued after June 30, 2023 or the RFCDL is still pending.

USAC is in the process of updating its systems to reflect the new service delivery date for upcoming and existing ECF commitments. Until the systems work is completed, the previous date of June 30, 2022 will still be reflected in your FCDL and in the ECF Portal.

Please note that the Order does not impact funding requests for the construction of new networks or the provision of customer premises equipment for datacasting services. Applicants seeking support for special construction or customer premises datacasting equipment are provided one year from the date of their funding commitment decision letter to demonstrate that construction is completed and the services have been provided.

If the applicant doesn't start service until after its funding commitment decision letter is approved for a first or second window funding request, can it still receive the 12 months of service requested and approved?

Yes, the Bureau granted a waiver (DA 22-176) extending the service delivery deadline for all first and second window funding requests for equipment, other non-recurring services, and recurring services from June 30, 2022 to June 30, 2023. Applicants may request reimbursement for the 12 months of service that was requested and approved, even if they didn't start the service until after the funding commitment decision was received.

If the applicant didn't start service until September 1 and originally requested only 10 months of service, can it now request additional funding for recurring services beyond June 30, 2022 with the FCC's new service delivery date extension for first and second window funding requests?

No, requests to increase the support amount for a funding request, pre-or post-commitment, will be denied.

ECF Requests for Reimbursement Reminders of the Week

Check out our Request for Reimbursement ECF FCC Form 472 (BEAR) Checklist and Request for Reimbursement ECF FCC Form 474 (SPI) Checklist for step by step guidance on what to do after you receive a Funding Commitment Decision Letter.

Check SAM.gov Registration — We also remind applicants and service providers, who agree to invoice on behalf of the applicant, to ensure your SAM.gov information and registration is updated and active. If you will be submitting ECF requests for reimbursement (i.e., ECF FCC Form 472 or ECF FCC Form 474) and have not completed or updated your SAM.gov registration, please do so now. You may use this link to complete or renew your SAM.gov registration: https://sam.gov/content/home . SAM.gov registrations must be renewed on annual basis. If not renewed, the account will be deactivated.

Following these reminders and tips will help streamline the review and processing of your ECF request(s) for reimbursement and can help you receive the funds more quickly. Requests for reimbursement will be reviewed and processed on a rolling basis.

For more reminders and tips regarding requests for reimbursement, please visit the <u>Reminders and Tips</u> page on the ECF Program website.

For More Information

Please review the <u>FCC's Emergency Connectivity Fund FAQs</u>, which it continues to update as new questions come in.

More detail on the ECF Program is available in the FCC <u>Order</u> that established the Emergency Connectivity Fund Program. To learn more, please visit <u>EmergencyConnectivityFund.org</u> and sign up for <u>EmergencyConnectivityFun</u>

Applicants and service providers can also contact the Emergency Connectivity Fund Customer Support Center (CSC) with questions at (800) 234-9781 Monday – Friday from 8 a.m. to 8 p.m. ET, or submit a case in the ECF Portal.

We appreciate your interest in the ECF Program and look forward to your ongoing engagement as we work together to close the Homework Gap!

Need Help? Contact Us!

Please contact the Emergency Connectivity Fund Customer Support Center (CSC) at (800) 234-9781 or create a case in the ECF Portal.