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USAC

Emergency Connectivity Fund Program Newsletter

March 29, 2022

In view of outstanding demand, the FCC [announced](#) that they will open a third application filing window for schools and libraries to request Emergency Connectivity Fund 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. **The third application filing window will open on Thursday, April 28, 2022 and close on Friday, May 13, 2022, at 11:59 p.m. ET.**

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.

SAM.gov to Transition From DUNS Number to New Unique Entity Identifier on April 4th

SAM.gov will no longer use the Dun & Bradstreet Data Universal Numbering System (DUNS) number and instead will use the Unique Entity Identifier (UEI) number that is assigned to an entity when they register with SAM.gov. The SAM.gov system will stop using the DUNS number starting on April 4, 2022. As a result, USAC has added the UEI number data field in the ECF invoicing system. Applicants and service providers who already have active SAM.gov registrations will not need to do anything as part of this SAM.gov transition process. USAC and the ECF invoicing system will auto-populate the UEI number from the applicant's or service provider's active SAM.gov account. However, if you plan to submit ECF requests for reimbursement (i.e., FCC Forms 472 or 474) and have not registered in SAM.gov yet, this means that you will not need to obtain a DUNS number to complete your SAM.gov registration. New SAM.gov registrants are assigned a UEI number as part of the registration process. An active SAM.gov registration and valid UEI number are required to submit requests for reimbursement and receive payments through the ECF Program. If you do not have an active SAM.gov registration, you will need to complete the registration process and provide the assigned UEI number in your ECF Portal account. If you have a deactivated SAM.gov account, a UEI number was already assigned to you and you can obtain your UEI number through your SAM.gov account. However, to submit requests for reimbursement and receive payments through the ECF Program, you will also need to renew your SAM.gov account.

Key Reminders

Processing Invoice Denials – If you receive an invoice decision email denying your request for reimbursement, you may resubmit your request for reimbursement following the standard process up until your invoice filing deadline. If the request for reimbursement was denied because of non-responsiveness or insufficient or incorrect documentation, please include the requested information/documentation when you submit your new request for reimbursement.

Unmet Needs – We remind applicants that during the review of requests for reimbursement, you may be asked to provide information regarding your unmet needs, in addition to the information provided during the application review process. This is required to confirm the applicant’s actual unmet needs.

Changing Invoice Method – Please note that if you submit a post commitment request to change your invoice method, you must also cancel the original invoice submission and resubmit the request for reimbursement according to the revised invoice method. You can cancel your original invoice submission by using the ‘Communications’ page for the request for reimbursement that needs to be cancelled.

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 equipment or 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 funding request.

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 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)) will become effective upon publication in the Federal Register.

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

The Commission 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 extenuating circumstances, such as during a school's summer break, where the services would still be 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 all Emergency Connectivity Fund 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 post-commitment change or a successful appeal of previously denied or reduced funding; or
- The service delivery date of June 30, 2023.

This also means that all of 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.

The modified service delivery date rule (section 54.1711(e)) became effective on March 14, 2022. 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 therefore still seek 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 1st 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 new [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.

Provide a Detailed Vendor Invoice Attachment with your ECF FCC Form 472/474 – Please ensure the invoice contains the date that the service or equipment is delivered or shipped and the date is within the relevant funding period. Also ensure that the date of the service for non-recurring charges, or the bill date for recurring charges is consistent with what was entered on the ECF FCC Form 472/474.

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.

If you would like further assistance in updating the FCC Registration Number, please contact (877) 480-3201 (Monday – Friday 8 a.m. – 6 p.m. ET) or email: CORES@fcc.gov.

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 [Reminders and Tips](#) page on the Emergency Connectivity Fund Program website.

For More Information

Please review the FCC’s Emergency Connectivity Fund FAQs, which it continues to update as new questions come in: www.fcc.gov/emergency-connectivity-fund-faqs.

More detail on the Program is available in the FCC [Order](#) that established the Emergency Connectivity Fund Program. To learn more, please visit EmergencyConnectivityFund.org and sign up for [Emergency Connectivity Fund Program emails](#) .

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 Emergency Connectivity Fund 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.