Commitment Adjustment & Recoveries Functionality Coming Soon to ECF

Similar to the E-Rate program, the functionality to issue Commitment Adjustments (COMADs) and Recoveries of Improperly Disbursed Funds (RIDFs) notifications for the Emergency Connectivity Fund (ECF) program will be available before the end of calendar year 2022. As with the E-Rate program, USAC and the Commission may be required to reduce or recover ECF funding if it is determined that the ECF program rules were violated or when ECF funding was disbursed in error or improperly. These actions are necessary to protect the ECF program from waste, fraud and abuse. For more information, please visit the ECF website, under the Post-Commitment dropdown, in the coming weeks.

Updated Frequently Asked Questions (FAQs)

The FCC just added two new FAQs to their website:

*9.12a Q: If a service provider discovers that funded equipment and/or services are not being used, should they automatically allocate those costs from their requests for reimbursement and bill the applicant directly for this non-usage?

A: If a service provider determines that there is non-usage, we strongly encourage them to notify the school or library and provide a reasonable period of time (e.g., 30 days) to allow the school or library to reach out to the student, school staff member, or library patron to determine if the service is no longer needed. The ECF Program rules do not require the applicant and/or service provider to immediately remove the equipment/services provided to the student, school staff member, or library patron from their ECF requests for reimbursement, but do require that they take reasonable actions to monitor and track usage, which includes providing the school or library notice and time to first address the non-usage issue.

*9.14 Q: Once a funding commitment decision letter has been issued, are there any additional steps that service providers using SPI invoicing should take before starting the services and/or submitting requests for reimbursement?

A: Given that only best estimates of the unmet needs were required at the application stage, service providers are reminded to work with the applicant once the funds have been committed to ensure that they are only seeking reimbursement for the actual number of students and school staff with unmet needs. While there is no requirement in the ECF Program to confirm the start of services before invoicing (like on the FCC Form 486 in the E-Rate Program, for example), service providers and applicants should work together to ensure they are not requesting reimbursement for equipment and/or services that are not needed or not being used. We remind applicants and service providers that requesting extra equipment to account for anticipated damage or loss, or for warehousing, is not allowed under ECF program rules. We also remind applicants and service providers of the one connected device and one hotspot device per student, school staff member, or library patron limit. Applicants and service providers will be responsible for returning funds if it is determined that they are not compliant with ECF program rules.

ECF Requests for Reimbursement Reminders & Tips

Invoicing Checklists – 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 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. Visit the SAM.gov website to complete or renew your registration. SAM.gov registrations must be renewed on annual basis. If not renewed, the account will be deactivated.

For more reminders and tips regarding requests for reimbursement, please visit the <u>Reminders and Tips</u> page on the ECF Program website. Following these reminders and tips will help streamline the review 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 Information

Please review the FCC's Emergency Connectivity Fund FAQs, for any additional updates or additions.

More detail on the ECF Program is available in the FCC <u>Order</u> that established the Emergency Connectivity Fund Program. For information on the program, please visit <u>EmergencyConnectivityFund.org</u>, join our training sessions, and sign up for <u>Emergency Connectivity Fund Program emails</u>.

Applicants and service providers can also contact the ECF Customer Service 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!