

USAC

Emergency Connectivity Fund Program Newsletter

January 11, 2022

The Emergency Connectivity Fund Program (Program) provides funding to schools and libraries for the reasonable costs of laptop and tablet computers, Wi-Fi hotspots, routers, modems, and broadband internet connections for use by students, school staff, and library patrons at locations that include locations other than a school or library. Funding is limited to students, school staff, and library patrons who would otherwise lack access to connected devices and broadband Internet services sufficient to engage in remote learning during the COVID-19 pandemic. Applicants have now requested over \$6.4 billion from the \$7.17 billion Program in the first and second application filing windows. Additional information about the demand can be found at https://www.fcc.gov/reports-research/maps/ecf-state-demand/.

Funding Commitments

Yesterday, the FCC **announced** the seventh wave of funding commitments totaling over \$361 million for the Emergency Connectivity Fund Program. This round of commitments includes over \$155 million from Window 1 applications and nearly \$206 million from Window 2 applications. To date, the FCC and USAC have committed over \$4.2 billion in program funding to school and library applicants. The FCC and USAC will continue to expeditiously review applications and will be issuing additional funding commitment decisions on a rolling basis in the coming weeks.

Invoice Deadline Waiver and Service Delivery Date Clarification

On December 2, 2021, the FCC's Wireline Competition Bureau issued an Order (DA 21-1499) addressing a petition for expedited waiver filed by the State E-rate Coordinators' Alliance (SECA). The Order grants a limited waiver of the invoice filing deadline and directs USAC to use August 29, 2022 (i.e., 60 days after June 30, 2022) as the invoice filing deadline for first and second window applicants who mistakenly used June 30, 2022 as the service delivery date for equipment and non-recurring services, as well as for the service providers who agreed to file requests for reimbursement on behalf of these applicants.

Furthermore, the Order clarifies that the service delivery date for all requests for equipment, other non-recurring services, and recurring services submitted in any filing window covering funding for purchases made between July 1, 2021 and June 30, 2022 is June 30, 2022. This means that the invoice

filing deadline for these requests is now 60 days from the date of the funding commitment decision letter (FCDL); a revised funding commitment decision letter (RFCDL) approving a post-commitment change or a successful appeal of previously denied or reduced funding; or August 29, 2022, whichever is later.

Request for Reimbursement Submission

Invoicing is available through the ECF Portal. Service providers and applicants have access to the ECF Portal through their One Portal dashboard and can view any funding requests that they are associated with through the ECF Portal. Applicants and service providers who agree to invoice on behalf of applicants can also use the ECF Portal to submit requests for reimbursement (i.e., ECF FCC Forms 472 or 474) for the Program. Requests for reimbursement will be reviewed on a rolling basis.

E-learning modules that provide a walkthrough of the reimbursement forms including the ECF FCC Form 472 (BEAR) and ECF FCC Form 474 (SPI) have been posted in the Training section of the Emergency Connectivity Fund Program website.

Please note that applicants and service providers who agree to invoice on behalf of applicants will not be able to receive program funding until they have completed their SAM.gov registration. The SAM.gov banking information will be used for issuing payments to applicants and service providers. If you will be submitting Program requests for reimbursement (i.e., ECF FCC Form 472 or ECF FCC Form 474) and have not completed 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.

Please be aware that both the DUNS TIN/EIN that was used for SAM.gov registration and the FCC Registration Number TIN/EIN of the entity who will be invoicing must match to ensure that banking information is accurate and can be validated. To verify that the FCC Registration Number provided results in an EIN match, or 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: <u>CORES@fcc.gov</u>.

File the FCC Form 498 (Service Providers Only)

Service providers must also file the FCC Form 498 in order to gain access to the ECF Portal to request reimbursement. Please note that the form will ask for banking information, however, the FCC will rely upon that which is stored in SAM.gov for disbursement purposes.

After you complete this form, USAC will assign a unique nine digit number, known as a Service Provider Identification Number (498 ID/SPIN), and will set up a user name and password for you to access the <u>E-File system</u>, a portal that allows you to update your FCC Form 498 online and set up permissions for other users in your company.

Some of the contact information on the FCC Form 498 can be searched using the <u>SPIN Search Tool</u>, so it is helpful to keep your information current in case another program participant needs to contact you.

Access the ECF Portal

Once a service provider receives the 498 ID, they will automatically be granted access to the E-rate Productivity Center (EPC). If you are a new service provider, you must log in to EPC, sign the terms and conditions, and wait 10 minutes to be granted access to the ECF Portal.

For additional information regarding the request for reimbursement process for <u>applicants</u> and <u>service</u> <u>providers</u>, including a walkthrough of the EC<u>F FCC Forms 472 (BEAR)</u> and <u>474 (SPI)</u>, please visit the Emergency Connectivity Fund Program website.

Request for Reimbursement Decision Notification

Once USAC has completed its review of a request for reimbursement, USAC will send a notification through the ECF Portal via email to all users with access to the request for reimbursement, which are set by the account administrator. USAC issues this notification when it has sent the payment batch to the FCC for processing. It can take up to five business days for the FCC to process the payment with the U.S. Treasury, and for the funds to be disbursed into the bank account on file with SAM.gov. The U.S. Treasury will then issue a notification to the contacts listed in SAM.gov when amounts are deposited. For more information regarding the <u>Request for Reimbursement Decision notification emails</u>, please visit the Emergency Connectivity Fund Program website.

Please communicate any questions or concerns regarding requests for reimbursement via the ECF Portal. To speak to a representative, contact the Emergency Connectivity Fund Customer Support Center (CSC) at (800) 234-9781.

Request for Reimbursement Reminders and Tips

Requests for reimbursement will be reviewed and processed on a rolling basis. Here are a few <u>reminders and tips</u> that applicants and service providers can follow in order to streamline and expedite the review process:

Invoice Attachment – When filling out the ECF FCC Form 472 (BEAR) and ECF FCC Form 474 (SPI), applicants and service providers must include the vendor invoice as an attachment. Quotes, sales orders, and purchase orders are not acceptable substitutes. As a reminder, applicants and service providers cannot invoice for future months of services. Please only submit invoices for those months of service that have already passed (i.e. in January 2022, USAC can reimburse for the months of July through December 2021). For recurring services, service providers should include the following in the vendor invoice that is submitted with the reimbursement request: a confirmation of the lines purchased by the applicant that supports the number approved, the dollar charge per line, and billing dates that match the invoiced service dates approved on the ECF FCC Form 471. For monthly fees, when submitting a request

for reimbursement please attach each monthly invoice and an itemized date list. This will aid the review team in matching the dates to each invoice.

- Service and Delivery Dates Requests for reimbursement should not be submitted for equipment or services that have not yet been received. Please make sure to identify the start and end dates for services or the date of delivery (or shipment) in the invoice attachment.
- Equipment and Services Confirmation Before submitting the form, confirm that the make and model of the equipment and services listed on the invoice matches what is listed on the ECF FCC Form 471. For lengthier invoice documents, we recommend including a 'cover letter' with the vendor invoice document or as a separate attachment that identifies where the listed equipment and services, the delivery date, cost breakdowns, and service start and end dates can be found within the vendor invoice. This will aid in expediting the review process.
- **Taxes** Applicants and service providers can only request reimbursement for taxes on eligible equipment and services. Additional taxes on an invoice for equipment and services that are not eligible for reimbursement should be removed from the request for reimbursement amount.
- Unmet Needs Actual unmet needs must be finalized prior to requesting reimbursement. Schools and libraries may only request ECF reimbursement for services that fulfilled an actual unmet need of a student, school staff member, or library patron who would otherwise lack access to connectivity sufficient to engage in remote learning consistent with the application certification. Service providers should work with their customers to verify unmet needs quantities prior to submitting SPI invoices. While the FCC has not prescribed specific data collection requirements for documenting the unmet need, schools and libraries should be prepared to describe how and when they collected the information that they use for the determining actual unmet needs associated with their request for reimbursement. Although it is not required for the request for reimbursement submission, schools and libraries may also be asked to provide documentation to support actual costs of services to those students, school staff members, and library patrons during the review process.
- Matching Documentation Costs on the submitted service provider invoice must match the information that was entered on the ECF FCC Form 471. For example, costs that were bundled on the submitted ECF FCC Form 471 should also show as bundled on the submitted service provider invoice. Please ensure that you submit an invoice that mirrors the ECF FCC Form 471 in order to avoid delays in processing.

Appeals and Post-Commitment Requests

To find more information regarding how to file <u>Appeals</u> and Post-Commitment requests for <u>applicants</u> and <u>service providers</u>, please visit <u>EmergencyConnectivityFund.org</u>. An e-learning module that provides a walkthrough of how to submit a <u>Post-Commitment request</u> is posted on the <u>Training</u> section of the Emergency Connectivity Fund Program website.

Frequently Asked Questions

What is the deadline for filing requests for reimbursement for funding requests submitted during the first and second application filing windows?

On December 2, 2021, the Bureau clarified that June 30, 2022 is the service delivery date for all requests for equipment, other non-recurring services, and recurring services submitted in any filing window covering funding for purchases made between July 1, 2021 and June 30, 2022. 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, 2022.

This means that all of these funding requests have an invoice filing deadline of August 29, 2022, unless the FCDL is issued after June 30, 2022 or the RFCDL is still pending.

Please see DA 21-1499 for more information about the service delivery date and invoice filing deadline. The updated rule (47 CFR 54.1711(e)) will become effective upon publication of the Order in the Federal Register.

This means that all of these funding requests have an invoice filing deadline of August 29, 2022, unless the FCDL is issued after June 30, 2022 or the RFCDL is still pending. Please see **DA 21-1499** for more information about the service delivery date and invoice filing deadline rules. The modified service delivery date rule (section 54.1711(e)) became effective on December 14, 2021.

Can I request to add equipment or increase my funding amount if I have already received an FCDL?

No. Once a funding commitment has been issued, any post-commitment requests to increase the funding amount or the quantity of the equipment and/or services for a committed funding request will be dismissed. Applicants with questions or concerns about a committed funding request should contact the Emergency Connectivity Fund Customer Support Center (CSC) at (800) 234-9781 or use the external communications tab in the ECF Portal.

What should an applicant or service provider submit along with a request for reimbursement (ECF FCC Form 472/474)?

Each request for reimbursement must be accompanied by a vendor invoice supporting the amount requested. Vendor invoices must include the level of detail needed for USAC to validate the following information during its review of this supporting documentation.

A date of the service for non-recurring charges, or a bill date for recurring charges that is consistent with what was entered on the ECF FCC Form 472/474.

- A date of the service or bill that is acceptable based on the relevant funding period.
- The equipment or services provided are the same as what was approved on the ECF FCC Form 471 (unless modified pursuant to an approved post-commitment change), and are at or below the price approved on the ECF FCC Form 471.

- The service provider who provided the equipment or services is the same as the service provider approved on the ECF FCC Form 471 (unless modified pursuant to an approved post-commitment change).
- The date that the service or equipment is delivered or shipped.

What should I do if the vendor invoice that I am submitting with a request for reimbursement does not contain a delivery/shipped date?

We encourage applicants to work with their service providers to ensure delivery information is on the invoice. However, if a vendor invoice does not include a delivery or shipped date, supporting documentation that demonstrates that the equipment or services have been delivered or shipped (e.g., a packing slip or other proof of delivery) can be uploaded to expedite the review of the reimbursement request. The supporting documentation must be consistent with the timing of the delivery date on the request for reimbursement form.

Are taxes included as part of the \$250 maximum for Wi-Fi hotspots?

No. Taxes are not included as part of the \$250 cap for Wi-Fi hotspots, but reasonable fees are included within the \$250 capped amount.

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How can I change the service provider or the make or model of equipment after I've received a funding commitment decision letter (FCDL)?

After an FCDL has been issued, you will need to submit a request to change the service provider or the equipment and/or service through a Post-Commitment Request Form in the ECF Portal. USAC will review your request and notify you of its decision and/or whether more information is needed via email. Please visit USAC's Emergency Connectivity Fund Program website for additional information regarding the Post-Commitment Request process for <u>applicants</u> and <u>service providers</u>.

Can I submit an invoice for a partial FRN and a partial Line Item within one FRN?

Yes, invoices for a partial FRN and also a partial Line Item within one FRN are acceptable. Please ensure that all requests for reimbursement are submitted by the Invoice Deadline Date listed on the FCDL, and ensure that requested amounts are within the approved amount on the FCDL.

When will information about applications filed during the second application filing window be made available on Open Data?

Data from Emergency Connectivity Fund Program funding applications submitted during the second application filing window are now available on <u>USAC's Open Data platform</u>.

Do I need a SAM.gov account if I am an annual E-Rate applicant?

SAM.gov registration is necessary for all applicants and service providers that are submitting requests for reimbursement (ECF FCC Forms 472 or 474) and receiving funds from the U.S. government.

Because this is not currently required to participate in the E-rate program, applicants who are planning to submit requests for reimbursement (ECF FCC Form 472) and have not registered before should begin the process now. Service providers that agree to invoice on behalf of applicants also need to be registered with SAM.gov. Emergency Connectivity Fund Program applicants whose service providers will file Program requests for reimbursement on their behalf (SPI invoicing) are not required to register in SAM.gov.

Can a school or library submit a reimbursement request after it has received the Program-supported equipment but before it distributes the equipment to their students, school staff, or library patrons? Yes. While the school or library must have received the equipment or services prior to submitting their request for reimbursement and must certify to this on the ECF FCC Form 472, they can seek reimbursement before distributing the equipment or services to students, school staff members, or library patrons with an unmet need.

Applicants and service providers are also reminded of the need to certify on their reimbursement requests (ECF FCC Forms 472 or 474) that they are not willfully or knowingly requesting reimbursement for equipment or services that are not being used.

I'm still waiting to hear back about my application. Is there anything else I should be doing now? Double check that you have completed all of the registrations necessary for applying for and/or receiving Emergency Connectivity Fund Program support, including:

- Obtaining a DUNS Number,
- Obtaining an FCC Registration Number,
- Obtaining a Billed Entity Number, and
- Registering with SAM.gov.

Be sure that the information provided in these registrations match the information included on your application. For more information about these registrations, review the <u>Getting Started</u> webpage.

Also, please be sure to respond to all information requests in a timely manner.

I can access the ECF Portal, but can't file any forms – what can I do?

Users that have view-only permissions will only be able to see forms created by others but cannot create forms themselves. The account administrator must upgrade your permissions in order to create forms. Please contact the account administrator for your organization.

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

For More Information

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. Visit the Training section of the Emergency Connectivity Fund website to view trainings, access e-learning modules and view recordings of past trainings and office hour sessions.

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.