Slide 1

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E-Rate Modernization
Funding Year 2016
for
Kansas Schools

Don Dietrich

BTU Consultants, LLC

(Includes content from November, 2015 SLD Seminars, with permission)

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Slide 2

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E-Rate 2015 Agenda

9:00am - Morning Session
E-Rate Changes
  Modernization Continues → 2016
  NEW - SLD Portal - EPC
Preparing for E-Rate 2016
  CIPA, Budgets, Categories and Eligible Items
  Discounts Urban and Rural
Applying for E-Rate 2016
  Competitive Process
  New Forms 470, 471, Item 21 Details

12:00 – 1:00pm Lunch

1:00pm - Afternoon Session
  New Forms 470, 471, Item 21 Details (cont'd)
E-Rate Approval and Acceptance Process
  PIA Review, Forms 486 & Form 500
  BEARS vs. Discounts
  Record Keeping, Appeals & Audits

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Slide 3

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What's in your email…handouts for today

- Copy of this presentation (.ppt)
- EPC-Applicant-Guide-Getting-Started (.pdf)
- Form 470 Item 13 Requirements 2016 (.doc)
- Form 470 Prep Worksheet Template & Example (.xls & .pdf)
- Form 470 Response Log Template & Example (.xls & .pdf)
- FCC Form 471 Field Descriptions FY2016 (.pdf)
- E-Rate Project Tracking Template & Example (.xls & .pdf)
- Sample Bid Evaluation (.xls & .pdf)
- Asset Inventory Sample (.pdf)
- SLD Contact Information (.pdf)
- SLD Glossary 2016 (.pdf)

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KSDE> TAKE > E-Rate

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E-Rate Changes since 2015 – "E-Rate Modernization" continues this year…

- **Goal**: Re-focus E-Rate to provide broadband connectivity to and inside buildings for ALL schools and libraries (not just 90%) with no increase in funding
- **Solution:** Beginning FY2015
  - Eliminate or phase out some Cat1 services (voice, email…) and equipment (voice and video) to provide more funds for Category Two broadband
  - Reduce the maximum discount and establish equipment funding caps per building to limit the amount of Cat2 funding per student and provide some funding to all applicants

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E-Rate Changes for 2015 (review)

- E-Rate Modernization Changes
  - Close the "WiFi Gap"
  - Streamline Approvals
  - Reduce/Remove some eligible items and cap C2 spending
  - Change Discount Calculations / Urban & Rural Status
  - Many (many) others
- New Eligible Services List `2016`
- New Form(s) 470 and 471 – yes again `2016`

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E-Rate Changes for 2015 (review)

- E-Rate Modernization Changes - Close the "WiFi Gap"
  - $1B funding for FY2015 and FY2016 Category 2
  - If demand exceeds available, prioritize on discount rate
  - If insufficient funds in a single discount rate, prioritize based on percentage of F&R students in each district within that rate
  - Top Category 2 discount is now 85%
  - Two-in-Five rule not in effect for 2015 and 2016

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E-Rate Changes for 2015 (review)

- E-Rate Modernization Changes – Streamline Approvals
  - ~~All Decisions complete by 9/1/15~~
  - *Multi-year Contracts reviewed only in first year*
  - *Start dates in April for Category 2 – can be as early as 4/1/16*
  - ~~Preferred Master Contracts (PMC) – starting in 2016~~
  - *Internet below $300/mo/bldg. can be exempt from 470*

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E-Rate Changes for 2015 (review)

- "Commercially available" bundled Broadband/Internet packages that cost less than $300 per month per building (pre-discount) can be purchased without first posting a Form 470
  - Minimum speed must be 100 mbps downstream and 10 mbps upstream
  - Cost must be based per building and cannot be averaged across multiple buildings
  - Annual cost of $3600 must include all equipment and installation charges and monthly recurring charges

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E-Rate Changes for 2015 (review)

- E-Rate Modernization – Reduce / Remove Eligible Items & Cap C2 spending
  - Category 1
    - Voice Services being phased out at 20% per year till gone
    - Web Hosting, Email and Cellular Data plans eliminated 7/1/15
    - NO CHANGES to Internet or WAN eligibility or discounts
  - Category 2
    - Network Equipment only eligible if required for Internal Broadband and WiFi – includes AP's, Switches, Cabling, UPS etc.
    - Includes MIB (Managed Internal Broadband) and Managed WiFi.
    - Includes Cloud based 'Virtualization' services 2016
    - Max discount rate reduced from 90% to 85%
    - Max pre-discount amount $150/student over 5 years

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E-Rate Changes for 2015 (review)

- E-Rate Modernization – Changes to Discount Calculations
  - Single Discount rate for entire district – simplified calculations
  - Clarified E-Rate discounts for CEO/CEP – using 1.6 multiplier
  - C2 Discounts on a per building basis
  - Max C2 discount rate reduced from 90% to 85%
- No 2016 changes to Urban / Rural classification

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E-Rate Changes for 2015 (review)

- E-Rate Modernization – Other Changes
  - Adopted SETDA Broadband Access Goals
  - Removed Tech Plan requirements
  - Document retention expanded from 5 years to 10
  - Strict Deadlines for Invoicing – only one extension granted and MUST BE REQUESTED PRIOR TO DEADLINE
  - Moving to ALL Electronic Forms by 2016
  - BEAR payments directly to *applicants beginning 7/1/2016*
  - Price 'Transparency'

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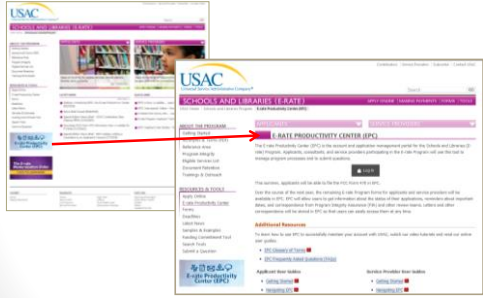
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E-Rate Changes for 2016   2016

- New Web Portal
- Changes to SLD Website
- New Eligible Services List
- New Form(s) 470 and 471 (yes again)
- Must now upload requirements (or RFP) on 470
- Direct BEAR payment to applicants
- New (better) rules for Dark Fiber
- Virtualization and cloud based functionality

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E-Rate Form 470 Begins at the Portal

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EPC Applicant Getting Started Guide

E-Rate Productivity Center – EPC Portal Activation

- USAC sends an invitation email to the account administrator to log in to the portal.
- The account administrator goes to portal.usac.org, enters his or her email address – the "Username" – and clicks "Forgot Password." *NOTE: As long as the account administrator has been set up in USAC's system, it is not necessary to locate the invitation email.*
- The account administrator then re-enters the email address and clicks "Request Password Reset."

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E-Rate Productivity Center – EPC Portal Activation

- USAC sends a second email with a link to create a password. **This link is only valid for 15 minutes.**
- The account administrator clicks the link, enters the email address, and creates a "new" password.
- After clicking "Reset Password," the account administrator can click the link provided to log in.
- After logging in with the email address ("Username") and password, the account administrator clicks the link to accept the terms and conditions of use.
- ***Passwords must be changed every 60 days***

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Online Learning Library - Schools and Libraries Program - USAC.org

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E-Rate Productivity Center – EPC Portal Activation

- Logon to establish your identity as Administrator
  - Signer of 2015 Form 471 is default Administrator
- Add users or consultants
- Grant rights
  - Administrator
  - Full
  - Partial
- Check all existing entities and information for correctness (NIFs will probably be missing)
- Update your Enrollment / NSLP data

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E-Rate Productivity Center – EPC Portal

- Everything will happen through the portal
- Static Information (contact info, entity info, contract info…) will be retained over the years and over multiple forms
- Multi-year approvals will become easier
- PINs are gone (after FY2015)
- RALs (paper acknowledgements) are gone
- BEAR Checks will soon be gone
- Passwords and Privileges are required

- Lots of videos available
- Online Learning Library - Schools and Libraries Program - USAC.org

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E-Rate Form 470 Begins at the Portal

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Changes to SLD Website

http://www.usac.org/sl/

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GETTING READY

TO

APPLY

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E-Rate Annual Cycle - 7/1/xx through 6/30/xx

Verify Portal Information	NOW
Plan & File Form 470	Oct - Nov
Assess Technology Needs / Budgets	
Gather Discount Information	
Develop Competitive RFPs (if required)	Nov - Dec
Advertise	
Vendor Conference(s)	
Vendor Responses Received	
System / Vendor Selection	December
Board Approvals	
Contract Negotiation	
Final Contracts Signed	Jan - Feb
Forms Submission to SLD (Form 471)	Feb/Mar 2016
Implementation (Form 486 / 500 / 472)	July – June

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E-Rate Program Rules – Basic Requirements

- Focus on delivery of Broadband and WiFi access
- Competitive Process – requests must be posted for 28 calendar (not business) days
- All funds must be used for
  - eligible goods and services
  - installed at eligible facilities
  - provided by eligible service providers

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You may need CIPA compliance for E-Rate

- CIPA (Children's Internet Protection Act) compliance is only required if you are applying for **Internet or Internal Connections**

- If you don't want to mess with CIPA…you should still file for Telecom

- No changes to CIPA/E-Rate for FY2016

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CIPA Requirements
(Includes Protecting Children in the 21st Century Act)

- Must have an Acceptable Use Policy or Internet Safety Policy that contains specific elements

- Must have a public hearing and public notice

- Must have technology protection (filtering) software in place to protect minors.

- All documentation supporting compliance with CIPA rules is maintained in E-rate binder.

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CIPA Requirements – PIA will ask you…

- Do you have a technology protection measure in place?
- Have you provided reasonable public notice to address a proposed technology protection measure and Internet safety policy?
- Have you held at least one public hearing to address a proposed technology protection measure and Internet safety policy?
- Did you have an Internet Safety Policy in place?
- Provide a written copy

PIA CIPA Questions.docx

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CIPA Resources

CIPA Rules from FCC
http://www.fcc.gov/cgb/consumerfacts/cipa.html

CIPA Rules from SLD
CIPA - Schools and Libraries Program - USAC.org

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ELIGIBILE GOODS

AND SERVICES

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E-Rate Eligibility – *2 Categories*

- Category 1 (to the building) – always funded
  - Voice Services
  - Telecommunications (including Dark Fiber)
  - Internet Access
- Category 2 (within the building) – virtually always funded – annual maximum per student per building
  - Internal Connections
  - Basic Maintenance of Internal Connections
  - MIBS

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E-Rate Eligibility - What's Covered ?

- **Category 1**
  - Local and long distance telephone usage, VoIP, PRI, T-1, WAN (any technology), Cellular
  - Dark Fiber (from any provider) – new rules for 2016 ⬅ 2016
  - Internet Access (any technology)
- **Category 2**
  - Internal Broadband and WiFi - LAN/WAN wired and wireless components including cabling, switches, routers, racks, UPS. Includes installation and maintenance on all eligible items
  - Basic Maintenance – only for work actually performed
  - MIBS - Managed LAN and WiFi (equipment and 'management' do not have to come from same supplier)
  - Virtualization and cloud based functionality ⬅ 2016

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What's Not Covered - same as 2015

- Servers, Voice and Video equipment
- Computers, Telephone instruments, Video Cameras
- Power infrastructure
- Physical security or construction
- Application Software
- Internet Content
- Consulting Services, Training, Personnel Costs

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What's Not Covered - same as 2015

NO MORE DATA PLANS...or AIR CARDS...

- Data plans and air cards for mobile devices are eligible only in instances when the school or library seeking support demonstrates that the individual data plans are the most cost effective option for providing internal broadband access for mobile devices as required in the *E-rate Modernization Order*.
- Off-campus use, even if used for an educational purpose, is ineligible for support and must be cost allocated out of any funding request.

PIA Data Plan review.doc

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Eligible Services List (ESL) 2016

ORDER

Adopted: **September 11, 2015**   Released: **September 11, 2015**

By the Chief, Wireline Competition Bureau:

I.   INTRODUCTION

1.   In this Order, the Wireline Competition Bureau (Bureau) releases the eligible services list (ESL) for funding year 2016 for the schools and libraries universal service support program (more commonly referred to as the E-rate program)[1] and authorizes the Universal Service Administrative Company (USAC) to open the annual application filing window no earlier than 60 days after release.[2]

ESL 2016

http://www.usac.org/_res/documents/sl/pdf/ESL_archive/EligibleServicesList-2016.pdf

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Eligible Services List (ESL) 2016

- Category 1 – Voice Reductions Continue

  - Telecom reduced 20% (i.e. 20 discount points from your current discount) per year until zero
  - Custom Calling Features not eligible since 7/1/2015
    - Directory Assistance charges   Inside wire maintenance plans
    - Voicemail   Text Messaging
    - 900/976 Call Blocking   Direct Inward Dialing

- Category 1 – Other non-Internet svcs remain ineligible.
  - Email   Web Hosting
  - Text Messaging   Data Plans

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Eligible Services List (ESL) 2016

- Category 1 – Dark Fiber Changes   `2016`
  - You can now 'build your own WAN'
  - Leased lit fiber and dark fiber is now "equalized"
  - Modulating electronics and equipment necessary to "light" the dark fiber are now eligible as Category 1 funds
  - Special construction charges for dark fiber may include the costs of installing fiber from the service provider's network all the way into the applicant's building
    - *Previously only cost of installing from property line into building was eligible*

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Eligible Services List (ESL) 2016

Category 2 Clarifications
- Caching Servers and Software
- Installation can be separate from Equipment
- Managed Internal Broadband Services (MIBS)
  - Services which cover the operation, management, or monitoring of a LAN or WLAN - Includes managed Wi-Fi
  - Could have a contract where a vendor owns, manages, operates and maintains network; or,
  - School could own the equipment, but have a vendor manage it for them
- Virtualized 'Cloud Based' Services   `2016`

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Eligible Services List (ESL) 2016   `2016`
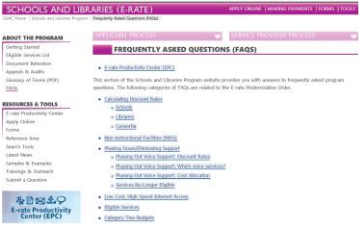### **Virtualized and Cloud-Based Functionalities**

- As part of the E-rate Modernization Order, broadband distribution services and equipment that can be virtualized in the cloud are eligible.
- This includes virtual or cloud based functionalities so long as they support eligible internal connection functions.
  - For example, software virtualizing routing or switching in the cloud is eligible.
- Equipment and functionalities must still be competitively bid and the most cost-effective solution must be chosen.

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Eligible Services - 2016

2016

E-Rate FAQs

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ELIGIBILE

LOCATIONS

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E-Rate Eligible Locations – no change

All K-12 Schools, Libraries and most NIFs (Non-Instructional Facilities)

Definition of Educational Purposes

- *Activities that occur on library or school property are presumed to be integral, immediate, and proximate to the education of students or the provision of library services to library patrons and therefore qualify as educational purposes. 7/1/15 – no offsite usage*
- *Customary work activities of employees of a school or library are presumed to fall under the definition of education purposes. 7/1/15 – no offsite usage*

E-Rate Eligible Locations – No change

- Examples of Non-Instructional Facilities (NIFs) that can receive Priority 1 services

SCHOOLS:
- Administrative buildings
- School bus barns and garages
- Cafeteria offices
- Facilities associated with athletic activities

LIBRARIES:
- Administrative buildings
- Bookmobile garages
- Interlibrary loan facilities
- Library technology centers

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E-Rate Eligible Locations – Category 2

- Category 2 services for administrative sites (NIFs) are NOT eligible unless those services are "essential for the effective transport of information to a classroom or library".

- Even if eligible – NIFs do not have a C2 Budget and must be funded by cost allocating other eligible entities.

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E-Rate Eligible Locations – start your own list

- What locations (entities) are you responsible for ?

- Which will you want to include on E-Rate Form 470 ?

- Assume all locations are in need of Category 1

- Are some (all) locations in need of Category 2 ?

- What is the C2 budget for each location ?

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DISCOUNTS

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E-Rate Discounts are Based on Poverty Level
Category 2 – max is now 85%

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Revised Discount Matrix

% of students eligible for National School Lunch Program	Category one schools and libraries discount matrix		Category two schools and libraries discount matrix	
	Discount level		Discount level	
	Urban discount	Rural discount	Urban discount	Rural discount
< 1	20	25	20	25
1-19	40	50	40	50
20-34	50	60	50	60
35-49	60	70	60	70
50-74	80	80	80	80
75-100	90	90	85	85

Note lower top discount rate for Category Two services.

Simplifying Discount Calculations I Fall 2014 E-rate Program Applicant Trainings

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E-Rate Discounts for C1 Voice are going away…

If Your District or Library's Discount is:	Voice Discount Will Be:				
	FY 2015	FY 2016	FY 2017	FY 2018	FY 2019
20%	No Funding	No Funding	No Funding	No Funding	No Funding
25%	5%	No Funding	No Funding	No Funding	No Funding
40%	20%	No Funding	No Funding	No Funding	No Funding
50%	30%	10%	No Funding	No Funding	No Funding
60%	40%	20%	No Funding	No Funding	No Funding
70%	50%	30%	10%	No Funding	No Funding
80%	60%	40%	20%	No Funding	No Funding
90%	70%	50%	30%	10%	No Funding

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Calculating Discounts - two variables

- The percentage of students eligible for the National School Lunch Program (NSLP) or an equivalent measure of poverty
  http://www.ksde.org/Default.aspx?tabid=2792

- The urban or rural status of the county or census tract in which the school or library building is located
http://Urban/Rural Status - Schools and Libraries Program - USAC.org/

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Calculating Discounts - Simplified

- Single schools or School Districts
  - Take the total number of students eligible for NSLP and divide by total students = percentage
  - Determine Urban or Rural Status
  - Take percentage to Discount Matrix to get discount
- All Schools within a district have the same discount
- New School Construction use same discount

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Determine Urban/Rural - Complicated

USAC   **Urban/Rural Classification**

Urban/Rural Status Changes
- Urban/rural status is based on 2010 U.S. Census data.
- Urban/rural status is now determined for the entire school district or library system, instead of for individual schools or libraries.
- More than 50% of the entities in a district/system must be rural for district/system to be classified as rural.
- Non-instructional facilities do not get an urban/rural status and are not counted in the determination of whether more than 50% of the entities are rural.

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Determine Urban/Rural - Complicated

USAC — Urban/Rural Lookup Tool

Schools and Libraries (E-rate)

Urban/Rural Lookup Tool

This tool is designed to help school districts, library systems, and individual schools and libraries determine the individual and aggregate urban vs. rural status which could be used in calculating the maximum discount used in a request for funds.

This tool is intended for information purposes only; no data or results from this tool will be submitted to USAC.

Choose the entity type for which you want to determine the rural/urban status:
- School district
- Library system
- Individual school
- Individual library

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Urban/Rural Lookup Tool | Fall 2014 E-rate Program Applicant Trainings

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[Urban / Rural Lookup Tool]

Determine Urban/Rural - Complicated

USAC — Urban/Rural Classification

Is My Entity Rural?

Schools/School Districts	Libraries/Library Systems
More than 50% of all schools are in rural areas.	More than 50% of all library outlets are in rural areas.
Do not include NIFs in the determination.	Do not include NIFs in the determination.
If there are six schools in district, and three are rural, district is urban.	If there are six libraries in district, and four are rural, library system is rural.

Simplifying Discount Calculations | Fall 2014 E-rate Program Applicant Trainings

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E-Rate Discounts – CEO/CEP Option

- CEP (Community Eligibility Program) is an FDA program that eliminates gathering application forms
- Schools that have an "Identified Student Percentage" (similar to Direct Certification) of 40% or more can qualify and can offer both free breakfast and free lunch daily to all students

   For E-Rate: Schools using CEP will use Direct Certs multiplied by 1.6 as the count of NSLP students.

   (The previous FCC guidance that CEP schools must use the NSLP data from the year before they opted into CEP has been repealed)

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Category 2 Budgets

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E-Rate Category Two Budgets

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Category Two Budgets

What are Category Two budgets?

- Each school or library receiving Category Two support in FY2015 and/or 2016 will have a five-year budget for Category Two products and services (those that distribute broadband *within* schools and libraries).

  – Category Two products and services include Internal Connections, Managed Internal Broadband Services, and Basic Maintenance of Internal Connections.

  – Products and services ordered in excess of an entity's Category Two budget will not receive E-rate discounts.

  – There is no budget for Category One services (those that connect broadband *to* schools and libraries).

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E-Rate Category Two Budgets

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Category Two Budgets

Which entities have Category Two budgets?

- Each individual school and each library outlet or branch has a pre-discount budget. School districts or library systems may not average their costs across multiple school or library budgets.

- Non-instructional facilities (NIFs) – including school NIFs with classrooms and administrative buildings – do not have pre-discount budgets.

  – If a NIF is essential for the effective transport of information to or within an school or library, the applicant must allocate the NIF costs to one or more of the entities benefiting from the service.

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E-Rate Category Two Budgets

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Category Two Budgets

How much is my budget?

- The pre-discount budget for a school is calculated by multiplying the total number of students at the school by $150, with a minimum of $9,200 if the school has fewer than 62 students.
- The pre-discount budget for a library is calculated by multiplying the total area in square feet – including all areas enclosed by the outer walls of the library and occupied by the library – by $2.30, with a minimum of $9,200 if the library is less than 4,000 square feet.

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Category Two Budgets | Fall 2014 E-rate Program Applicant Trainings

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E-Rate Category Two Budgets

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Category Two Budgets

How much is my budget (cont'd)?

- Remember that the budget is PRE-DISCOUNT.
- For example, for a school with 1,000 students:
  - At the **85%** discount rate (the maximum discount rate for Category Two), the school will have a pre-discount budget of $150,000, but may receive E-rate discounts of up to **$127,500**.
  - At the **50%** discount rate, the school will have a pre-discount budget of $150,000, but may receive E-rate discounts of up to **$75,000**.
  - At the **20%** discount rate, the school will have a pre-discount budget of $150,000, but may receive E-rate discounts of up to **$30,000**.

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Category Two Budgets | Fall 2014 E-rate Program Applicant Trainings

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E-Rate Category Two Budgets

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Category Two Budgets

What period of time does my budget cover?

- The pre-discount budget calculation is for a five-year period, starting with the first funding year in which you receive Category Two support.
  - However, you can apportion your pre-discount budget in a manner that best meets your needs. You could spend all of it in FY2015, spend 1/5 each year, or any other combination up to your total.
- If you do not receive any E-rate support for Category Two service in FY2015 or FY2016, and if the FCC does not act, the Two-in-Five rule will apply to your Category Two commitments in FY2017.

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Category Two Budgets | Fall 2014 E-rate Program Applicant Trainings

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E-Rate Category Two Budgets

Category Two Budgets

How do I allocate costs for shared services?

- On the FCC Form 471, you indicate how funding should be allocated among entities sharing services.
- Your allocation can be:
  - Straight-line (all entities share the cost equally)
  - Proportional (based on student count/square footage of each entity)
  - Specific (you specify each entity's share)

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E-Rate Category Two Budgets

Category Two Budgets

Example 5

- My school district has three schools – School A with 25 students, School B with 50 students, and School C with 75 students. How do I correctly allocate a shared service with a pre-discount cost of $300?

Straight line	Proportional by students	Specific (e.g., usage)
A = $100	A = 25/150 x $300 = $50	A uses 30% = $90
B = $100	B = 50/150 x $300 = $100	B uses 15% = $45
C = $100	C = 75/150 x $300 = $150	C uses 55% = $165
$300	$300	$300

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http://e-ratecentral.com/archive/News/News2014/weekly-news-2014-1117.asp#b2

E-Rate Category Two Budgets – 2016…

- Any funding commitments that included your entity as a recipient of service in FY2015 count against your pre-discount budget for that entity.

- If funding is remaining on a funding request, you can file an FCC Form 500 to return the funding to USAC.
  - If entities are sharing the service, we will need specific information so that USAC knows how to apply the returned funds to specific entities.

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E-Rate Category Two Budgets – 2016…

- **If you applied for Cat2 in 2015:**
  - You need to track your Cat2 expenditures by entity
  - See example tool in 'Project Tracking Spreadsheet'

- **If this is your first year to request Cat2:**
  - Calculate your C2 budget or use FFL's free tool at:
    http://www.fundsforlearning.com/schoolDistCalculator.php

- Must return unused funds using Form 500 to have access in future years

2016

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Should I file for Category 1, Category 2 or Both?

- ~~Your discount level determines whether or not you will be funded for Priority 2 goods and services:~~

- ALL applicants should apply for ALL available Category 2 Funding in FY2016
  - Technically it is only funded for 2015 and 2016
  - Per student CAP will allow funds to spread much farther
  - Nobody knows how much money will really be available

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Applying for E-Rate

Form 470

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Procurement Process

Plan	→	Procure	→	Implement

Tech Plan

Requirements

Design

Detail Specifications

Internal Approvals

Competitive RFP (if required)

Vendor Selection

Award Contracts

Submit Specific Requests

Coordinate Vendors

Monitor Installation

Resolve Upsets

Audit Financial Documents

Assure Completion

Recommend Acceptance

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E-Rate Forms

Plan	→	Procure	→	Implement

Form 470 2016

Notice of applicant's intent to acquire goods and services (non-specific as to amounts or vendors)

Form 471 2016

Specific request for goods and services, including total costs and vendor.

(includes Item 21)

Detailed cost and product info.

Form 486

Notice of intent to accept funds awarded

Form 500

Change award amount or items

Form 472 (BEAR) — *Recover discounts already paid to vendors for eligible goods and services.*

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E-Rate Form 470 Begins at the Portal

Step 2: Competitive Bidding - Applicants - Schools and Libraries - USAC

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E-Rate Form 470 – What's it for?

- Filing Form 470 opens a competitive bidding process
    - can also issue a Request for Proposals (RFP)
- Applicants are responsible for ensuring an open and fair process and selecting the most cost-effective provider of the desired services
- RFP is not required under FCC rules
- Even if you have an RFP, you must describe the services you desire on your Form 470

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E-Rate Form 470 – Gotcha's

- You must wait at least 28 days from the submission date before entering into a contract for services
- If you are under a multi-year contract from a previous year, you do not need to file a Form 470 every year
- If you are under Month-Month or Tariff rates, you must file a Form 470 every year
- Must indicate willingness for a multi-year contract or contract with extensions if appropriate

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E-Rate Form 470 – New process and New Form

- FCC Form 470 has major changes for FY2016
    - Drop down menus
    - Retained information
    - Requires specific quantities / descriptions
    - Must upload RFP if using one
    - Can no longer use a generic email address for contact

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E-Rate Form 470

- Consider adding ~~Item 13~~ *Narrative and Purchasing* 'Requirements'
  - Responses must be received via email only to email@myschool.org.
  - Responses must include detailed Item 21 level pricing and descriptions.
  - Responses must be received before the Allowable Contract Date.
  - Vendor must agree to SLD (SPI) invoicing.
  - Multi-year contracts and voluntary extensions accepted.
  - Vendor is aware of and agrees to follow SLD guidelines on Lowest Comparable Price.
  - Failure to comply with any of the items above may be grounds for disqualification.

Form 470 Item 13 Requirements

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E-Rate Form 470 – What you will need

- Access to portal
- 'Partial' Rights to draft form
- 'Full' Rights to certify
- You will need the general descriptions for each service that you are requesting *(use Form 470 Prep Worksheet)*
- *You need quantities of each type of service*
- If using a consultant – will need Consultant Registration Number and contact info – (*must be entered into Portal prior to starting your 470)*

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E-Rate Form 470 Prep Worksheet

Form Identifier (Free Format)	MYSCHOOL.470.01.2016	
1. Name of Applicant	Single School	
2. Funding Year (yyyy)	2016	
3. Billed Entity Number (BEN)	123456	
16. Number of Sites:	1	

Responses must be received via email only to contactperson@myschool.org. Responses must include detailed Item 21 level pricing and descriptions. Responses must be received before the Allowable Contract Date. Vendor must agree to SLD (SPI) invoicing. Multi-year contracts and voluntary extensions accepted. Vendor is aware of and agrees to follow SLD guidelines on Lowest Comparable Price. Failure to comply with all items above may be grounds for disqualification.

Line #	Category	RFP (Yes/No)	Service or Function (ex: Voice, Internet, Cellular...)	Qty	Narrative Description
1	Telecom	N	Local Phone Services (traditional or VoIP)	15	Local and Long Distance Voice services and other eligible services for approx 15 business lines. Will consider any technology (TDM or VoIP) that is P1 eligible.
2	Telecom	N	Cellular Voice & Data	30	Cellular voice and data services. Approximately 30-50 phones. Must clearly call out eligible and non-eligible pricing for voice and data.
3	Internet	N	Internet Access	1	Internet Access @100mb/s - upgradeable to 1Gbps in 100mb increments.
4	Internal Connections	N	Switch	25	
5	Internal Connections	N	WAP	50	Wired and Wireless LAN Upgrade for 3 story school building including APs, switches, cabling, UPS and other equipment to support WiFi and Broadband Data consistent with latest E-Rate Modernization Rules.
6	Internal Connections	N	CABLING	50	

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Form 470 Prep Worksheet   Sample RFP#1   Sample RFP#2

E-Rate Form 470 – Watch the Videos first !

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E-Rate Form 470 Begins at the Portal

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RFP Process – Issues in Competitive Bidding

SLD is on the lookout for these common 'problems'

- Must wait 28 days and 'be accessible'
- Must respond to all legitimate inquiries
- Vendor cannot help you with Form 470 or be involved in competitive process
- Multi-tiered vendor selection must follow rules
- NO 'Sham' Bidding (i.e. "I already know who I want")
- Cost to transfer to another provider alone is not by itself a good enough reason to stay with incumbent
- NO Gifts or 'Free' Services

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Issues in Competitive Bidding

- **How to handle email from vendors - you must save this stuff for 10 years**
  - **-Personal Folders**
    - YourDistrictE-Rate
      - Form470 2016
        - Non-Bids

Online Video Training – FCC Form 470: Competitive Bidding

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Vendor Selection – if there's not a formal RFP

- You must document and retain your vendor selection process
- Use this template or one of your own to record Form 470 responses from vendors
- Keep logs of all vendor emails
- Can also use for bid evaluations

E-Rate Form 470 Service Provider Response and Selection Log

Form 470 Response Log Spreadsheet

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Vendor Selection – if there is a formal RFP

USAC — Competitive Bidding

Bid Evaluation Matrix (sample)

Factor	Points Available	Vendor 1	Vendor 2	Vendor 3
Price of the ELIGIBLE goods and services	30	15	30	25
Prior experience w/ vendor	20	20	0	20
Prices for ineligible services, products & Fees	25	20	15	25
Flexible Invoicing: 472 or 474	15	0	15	15
Environmental objectives	5	5	3	2
Local or in state vendor	5	5	5	5
Total	100	65	68	92

Selecting a Vendor - Schools and Libraries - USAC

Handouts\Sample Bid Evaluation 2014.xlsx

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Vendor Selection – Do You Need a Contract?

- YES – for Category 1 FRNs that are not Tarriff or MTM
- YES – for all Category 2 FRNs
- Applicants must have a signed contract or *other legally binding agreement* in place prior to submitting their FCC Forms 471 to USAC.
- Contracts can cover more than one year or contain extensions, but applicant must have indicated these options in the Form 470

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E-Rate Form 471 – State Master Contracts

Fair and Open Competition

State Master Contracts

- A state master contract (SMC) is competitively bid and put in place by a state government for use by multiple entities in that state.
- **Single winner:** Single vendor wins the bid.
- **Multiple winners:** State awards contract to several bidders.
- **Multiple Award Schedule (MAS):** State awards contract for same goods and services to multiple vendors that can serve the same population.
  - Multiple winners always require vendor selection justification and applicants must conduct a mini-bid to award contract.

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Vendor Selection – State Master Contracts

Contracts

State Master Contracts

- If the contract expires either before the funding year starts or during the funding year, you may be able cite a State Replacement Contract (SRC) on FRNs
- FCC Form 470/Contract requirements:
  - Existing State Master Contract signed pursuant to a FCC Form 470 filed by the state
  - Replacement State Master Contract pursuant to a FCC Form 470 filed by the state
- See guidance on USAC's website for more information

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Applying for E-Rate

Form 471

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E-Rate Form - 471

- Provides specific information on services, service providers selected, and contracts
- Provides discount calculation information
- Must be filed for each funding year
- Contains certifications of compliance
- Includes one or more funding requests
- Each FRN must reference a specific Form 470

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E-Rate Form – 471 New for 2016

- Entered through EPC (like 470)
- Online form totally redesigned
- Survey questions are gone
- More detail on services required (ex: fiber or copper)
- Context sensitive – many fields pre-populated
- Can re-use information from year to year (entities, discounts, contracts etc)
- Basic flow unchanged (Billed Entity info → recipients of service → details of services and costs → certifications) *EXCEPT Item 21 is embedded in the form*

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E-Rate Form – 471 New for 2016

- You *can't* combine Category1 and Category 2 requests on the same Form 471
- The new forms require much more detail about pricing, contracts and other details and description of your FRNs
- Goal is nation-wide transparency

E-Rate Form 471 - Tips

- Remove ineligible costs from funding requests
  - Document ineligible costs carefully
  - 30% rule – if 30% or more of the dollar value of the request is for ineligible products and services, the entire request will be denied
- Calculate Cat2 Cost Allocation using worksheet
- Work with your service provider(s) to complete your Item 21 information

E-Rate Form 471 – What will you need

- EPC access – should have retained contact info from 470
- FCC Registration # avail at:
  https://fjallfoss.fcc.gov/coresWeb/publicHome.do
- Entity and Discount data
- Contract information
- Funding Requests
  - Competitive bid data (470 /RFP info)
  - Contract and pricing data
- Certification and signature
- See list of all fields in Handouts\FCC Form 471 Field Descriptions 2016.pdf

E-Rate Form 471 – Online

FCC Form 471 View - Funding Year 2015

Applicant: FREEPORT SCHOOL DISTRICT 145 Application Number: 1006316
Billed Entity Number: 135858 Nickname: FPT CAT1 2015
Date Submitted: Apr 07, 2015 Date Certified: Apr 07, 2015

Original Form Data   Current Form Data

Current form data is not available until a funding commitment decision has been made and an FCDL has been sent to the applicant.

Basic Information   Discount Calculation   Funding Requests   Certifications & Signatures   Back

Example Sample 471 2015

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Form 471 Project Tracking Spreadsheet

(Sample Project Tracking Spreadsheet)

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SLD E-Rate Resources – When you need help…

- User Hotline (1-888-203-8100)
- Online "Submit a Question" www.slforms.universalservice.org
- Email Questions to: questions@sl.universalservice.org
- Search Reference Area: Reference Area - USAC
- SLD Newsbriefs: News-briefs - Schools & Libraries – USAC
- E-Rate Central Newsletter http://www.e-ratecentral.com/subscribe.asp
- *SLD Online Learning Library: Online Learning Library - USAC*

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PIA Review – What is it ?

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Forms 471 are reviewed by Program Integrity Assurance (PIA) for compliance with program rules concerning areas such as:

- Competitive bidding process
- Contracts
- Discount Calculation
- Sufficient Budget
- Establishing Form 470
- *Cost Effectiveness*
- *Duplicative Services (Two Internet Feeds)*

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PIA Review

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Initial & Final Review

- Applications always start in Initial Review
- Initial Reviewer from regular and/or heightened scrutiny team contacts the applicant with questions
- Final Reviewer reviews the Initial Reviewer applications. If the Final Reviewer finds an issue with the review of the application, the application is returned to the Initial Reviewer to make corrections.
- Some Form 471 applications are selected for QA review
- Some Form 471s are selected for Special Compliance Review

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PIA Review – Corrections Allowed

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Clerical Corrections

Examples:
- Entered the incorrect amount (i.e., data entered $100 instead of $1,000)
- Omitted an entity from the Block 4
- Provided the incorrect Form 470 number on the Form 471
- Selected the wrong category of service
- Submitted an unsigned contract to PIA
- Omitted an FRN
- ***YOU ARE ALLOWED TO CORRECT ERRORS – BUT NOT TO CHANGE YOUR MIND***

PIA Example Question

PIA Example Response

PIA Call Log in Project Tracking Spreadsheet

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PIA Review – Know Your Rights

- At the end of the review, your reviewer must give you an opportunity to respond to any reductions or denials

- Applicants can cancel or reduce funding requests as a result of PIA-detected errors

- Applicants can "split out" services or entities into separate (new) funding requests.

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E-Rate – PIA Review

- Provide information to PIA promptly
- Work with your service provider to comply with information requests
- Make sure your answers respond completely to the questions asked
- Ask for more time to respond if you need it.

Check the 471 Application Status Tool (SLD website)

Form 471 Status Check Selection Criteria

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E-Rate Approval & Acceptance!

- You will receive an FCDL (Funding Commitment Decision Letter) for each Form 471 that you submit
  - cover page of important reminders
  - reports status of individual funding requests:
    - funded
    - not funded
    - as yet unfunded (Priority 2 requests)
    - Cancelled

Sample FCDL

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E-Rate Approval & Acceptance

ALWAYS Appeal a decision you don't agree with

Call BTU Hotline for assistance

866-372-8302

Appeal Example 06-09-2014

Appeal Approval 09-08-2014

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Applying for E-Rate

Form 486

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E-Rate Form 486 – Certifications Required

- Notifies USAC that services have started and invoices can be paid
- ~~Certifies that Tech Plan (if required) is in force and meets program requirements.~~
- Certifies that CIPA is in force (if required) and meets requirements.

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E-Rate Form 486 Deadline

- Form 486 must be filed online or postmarked no later than
  - 120 days after the Service Start Date OR
  - 120 days after the date of the FCDL

  whichever is later.
- If the Form 486 is late, the date 120 days before the Form 486 online filing or postmark date will become the start date for discounted services and funding may be reduced.

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E-Rate Implementation Deadlines

Service delivery deadlines

- Recurring Services (June 30)
- Non-recurring Services (September 30)

For Category 2 - you can request extensions – but your request must be filed before current deadline.

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E-Rate Form 486

Form 486 Filing Information - Applicants - Schools and Libraries - USAC

SLD Training Video - 486

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Category2 Record Keeping 2016

- You must retain records of all equipment and services including the location, serial number, date etc.
  - Make up your own tool or use SLD example:
    Asset Inventory samples-checklist-inventory-list from USAC

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E-Rate Reimbursements

Don't Stop Here – you have to ask for the money

- Applicants must use SPI (Service Provider Invoicing) or BEAR (Billed Entity Application for Reimbursement) process to actually **GET THE MONEY.**

- Contact your vendor – some can provide you with full monthly detail of eligible and non-eligible payments

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BEARs vs Discounts

- **BEAR** (Billed Entity Applicant Reimbursement) Form 472 is filed by the applicant and certified by the service provider after the applicant receives services and pays for the services in full.
- **DISCOUNTS** (SPI Service Provider Invoice) Form 474 is filed by the service provider after providing services and billing the applicant for its non-discount share.
- Form 472 or 474 must be filed online or postmarked no later than
  - 120 days after the last date to receive service OR
  - 120 days after the date of the 486 NL
  - *For Category 1 this is usually October 28, 20xx*

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E-rate Program Applicant Training
Direct BEAR Payment Process
October – November 2015

Washington DC • Tampa • Albuquerque • Minneapolis • New Orleans • Los Angeles • Philadelphia • Portland

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New BEAR Process for 2016

- Applicant logs into EPC portal to access invoice
- Applicant fills in information: SPIN
- Applicant fills in request: FCC Form 471 number, FRN, Dates, Amounts
- Applicant reviews and certifies information
- Applicant submits BEAR – only online
    - No service provider Certification Required

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New BEAR Process for 2016

- Payments scheduled twice a week when invoice approved – no longer two week delay for service provider notification
- BEAR payments only via electronic transfer to applicant
- Billed Entities will be paid directly to bank account
- Bank account information will be required

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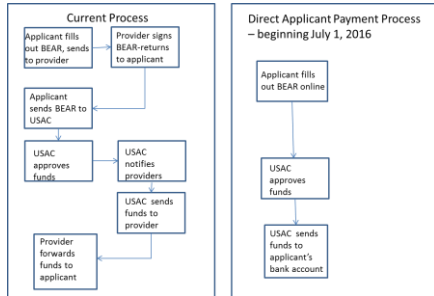
Rules for BEARs and Discounts

- A single 120 day invoice deadline extension will be granted ONLY if the request is rec'd by USAC on or before the original invoice deadline. Requests rec'd after the original deadline *will not be granted by USAC*.
- Can requests waivers from FCC but only if 'extraordinary'
- Absolute Deadline ~~is~~ was 10/28/15

If you have a 'good' reason for missing this deadline the FCC may allow it.

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IDER Example

KS 2014 Unclaimed Funds as of 11/05/2015

Unclaimed Commitments Might still be recovered!

KS Unclaimed Funds FY2014

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E-Rate Changes – Form 500

- Change FRN Start Date
- Contract Extensions
- FRN Extensions
- FRN Reductions
- FRN Cancellations
- *Cat2 Return of Unused Funds*

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E-Rate Changes Form 500

6. Service Start Date			
FCC Form 471	FRN(s)	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):

7. Contract Expiration Date			
FCC Form 471	FRN(s)	Original Date (mm/dd/yyyy):	New Date (mm/dd/yyyy):

Make as many copies of this page as needed, and number the completed pages so that they are all processed correctly. Please number your pages 2A, 2B, 2C, etc. and provide the number in space provided in Block 2.

- No ONLINE version (yet) – must print / fill out / mail

Form 500

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E-Rate Changes – Stuff Happens…

- You must notify SLD of any changes in the services that have been approved
  - Service Substitutions – you change your Internet from T-1 to 50mb fiber
  - SPIN Changes – your ISP goes out of business and you need a new provider
- There are standard SLD processes for all of these (and more)
- Examples and assistance at SLD website or ask for help.

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Service Substitutions

- Use if you change (buy) *anything* that varies from what you described on your 471 & Item 21
- No FORM, just follow instructions
- File Online using "Submit a Question"
- *Check your Category 2 projects for changes*
- *Vendors may not be paid for equipment or services that are not on your Item 21*

Service Substitutions - Schools and Libraries - USAC

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SPIN (Service Provider ID Number) Changes

- CORRECTIVE changes will be approved (correct errors, mergers, acquisitions etc)
- OPERATIONAL changes are usually not approved unless the original provider goes out of business
- No FORM, just follow instructions
- File online using "Submit a Question"
- Usually approved (or denied) in a few weeks
- Vendors will be notified

SPIN Change Guidance - Schools and Libraries - USAC

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Record Retention – *"if it isn't written down it didn't happen"*

- Setup an electronic and paper file for each funding year
- Make a checklist of included items
- Make a spreadsheet across years
- Monitor at least monthly
- Build an E-Rate Binder

Must Retain for 10 YEARS (up from 5)

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Record Retention – USAC Guidance

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- Downloadable Table of Contents Guide

- Downloadable Table of Contents (Word document preformatted for Avery© Ready Index 10)

- Located in USAC web site Reference Area

Samples & Examples - Schools and Libraries Program - USAC.org

E-Rate Binder Electronic - Example

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Audits 2016 – *they're back…*

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USAC   **How We Accomplish Program Integrity**

BCAP (Beneficiary and Contributor Audit Program)   2016
- Designed to assess compliance with FCC rules and identify and recover overpayments via audits
  – Performed by internal USAC staff or outside audit firm

PQA (Payment Quality Assurance Program)

- Designed to assess estimated rates of improper payments via assessments, not audits

2015 E-rate Program Applicant Trainings | Audit: Successful Program Participation   3
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Audits – PQA normally covers only one invoice

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USAC   **Payment Quality Assurance**

What is the process?
1. Select beneficiaries
2. Send announcement letter requesting documentation
3. Review documentation provided
4. Conclude on accuracy of payment and close case
5. Submit results to the FCC

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Audits and Category 2

USAC **Sufficient Documentation**

Avoid Common Findings – Category 2

- Equipment not installed or non-operational
- Beneficiary did not notify SLP of equipment that was transferred within three years of installation
- Lack of documentation demonstrating that BMIC services were performed
- Insufficient or inaccurate Fixed Asset Listing
  - See asset register example at http://www.usac.org/_res/documents/sl/pdf/samples/samples-checklist-inventory-list.pdf

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Audits and Category 2

USAC **Sufficient Documentation**

Basic Maintenance of Internal Connections

- Contract, including the list of equipment to be maintained with BMIC funds
- FAL, including the model and location of the equipment maintained
- Documentation, such as maintenance logs, demonstrating the maintenance was performed

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Appeals

- USAC decisions can be appealed to USAC or to the FCC.
  - *Beginning NOW – you must appeal first to USAC.*
  - Can appeal to the FCC if USAC denies.
- Can be filed electronically or on paper.
- Must be filed within 60 days of the USAC decision.
- Requests for waivers of rules must be filed with the FCC.

File an Appeal - Schools and Libraries - USAC

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Final Tips

- Start early
- Set up your EPC
- Document everything
- Email yourself to memorialize
- Build and retain an "E-Rate Binder" (10 years)
- Plan for eventual audit

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FY 2016 Window

Per FCC Window opens 'no earlier than' xx/xx/xxxx

471 Filing Window:

        opens at noon (EST) on ????

        closes at 11:59pm (EST) on ????

        LAST DAY FOR Form 470 is ????

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Kansas Resources

Kansas Department of Education
http://www.ksde.org/Agency/FiscalandAdministrativeServices/InformationTechnology(IT)/TAKE/E-Rate.aspx

Kansas E-Rate Listserve
Email to take@ksde.org
and request to be added to the E-rate listserv

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More Resources

EDLINC (Education & Library Networks Coalition):
http://www.edlinc.org/

Funds for Learning:
http://www.fundsforlearning.com

E-Rate Central:
http://www.eratecentral.com/

SLD Home Page:
http://www.usac.org/sl/

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Information & Assistance
Kansas E-Rate Support Hotline

866-372-8302

Our Goal: Answer all questions – escalate or provide references and contacts as required.

Resources include:
SLD and affiliated agencies & hotlines
Kansas State Dept of Ed: Kimberly Wright (kwright@ksde.org)
State Library of Kansas: Jeff Hixon (jeff.hixon@library.ks.us)

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Information & Assistance
E-Rate Support Hotline

We Can Provide Advice on:
SLD forms 470, 471, att 21, 486, 472, 500
Eligibility of goods, services and locations
How to prepare a SPIN change letter
How to prepare a Service Substitution letter
Strategy for writing an appeal
When to file an invoice extension request

We Cannot:
Prepare, complete or submit FCC forms
Act on behalf of an entity

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Information & Assistance

BTU Consulting, LLC

Toll Free Support Hotline – 866-372-8302

Website: http://www.btu-consultants.com/KS_Erate_Services.html

Email to:

Carol Underriner: carol@btu-consultants.com

Lori Thompson: lori@btu-consultants.com

Don Dietrich's email: ddietrich@e-rateprofessionals.com

Don Dietrich's Cell Phone: 314-378-1667

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Questions

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