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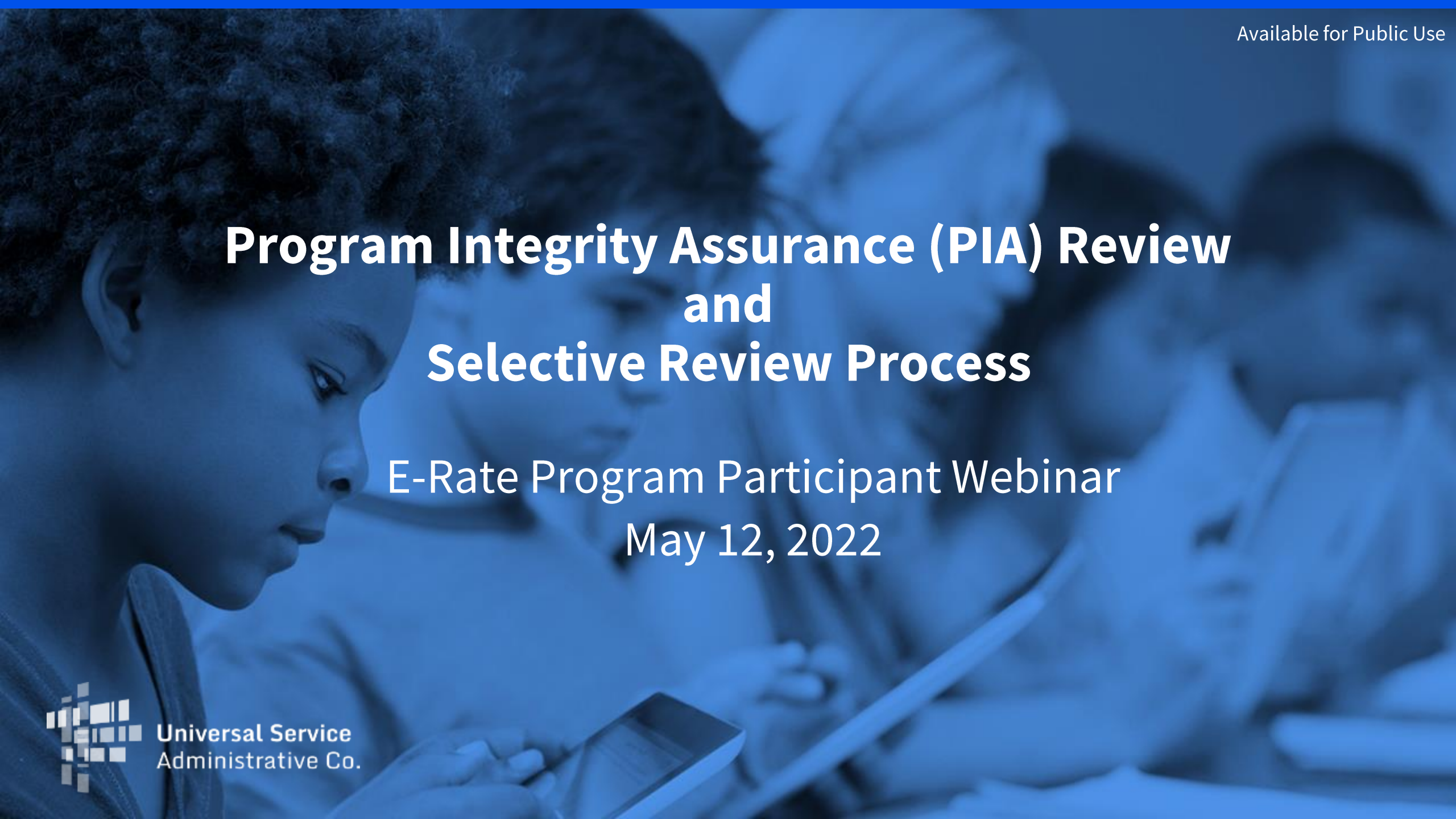

Program Integrity Assurance (PIA) Review and Selective Review Process

E-Rate Program Participant Webinar

May 12, 2022

Universal Service Administrative Co.

Disclaimer

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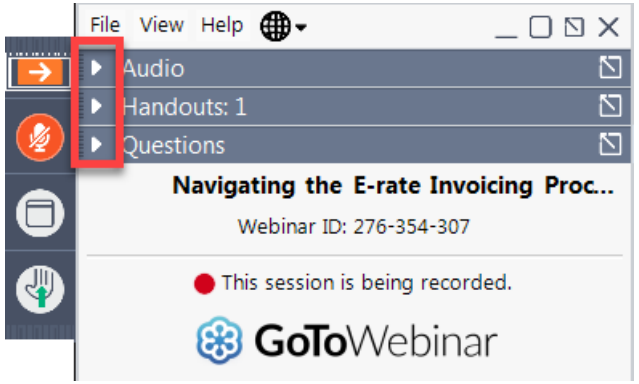
- Use the white arrows to open the sections in the panel.



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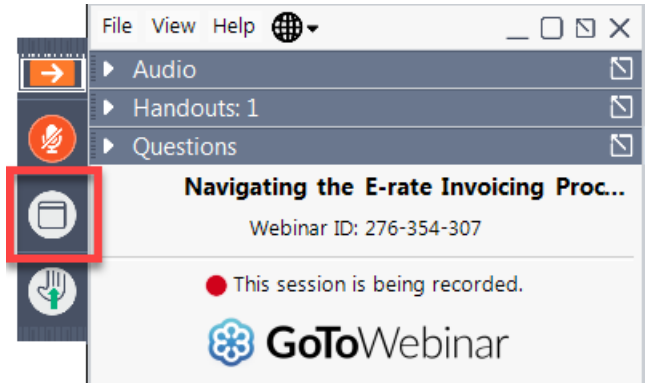
- You can use the panel to view the presentation in full screen or window mode.



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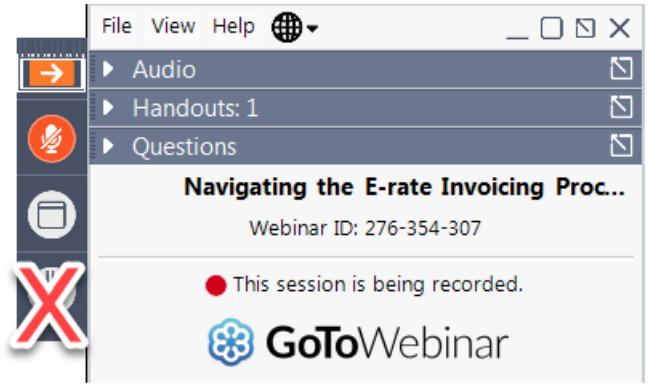

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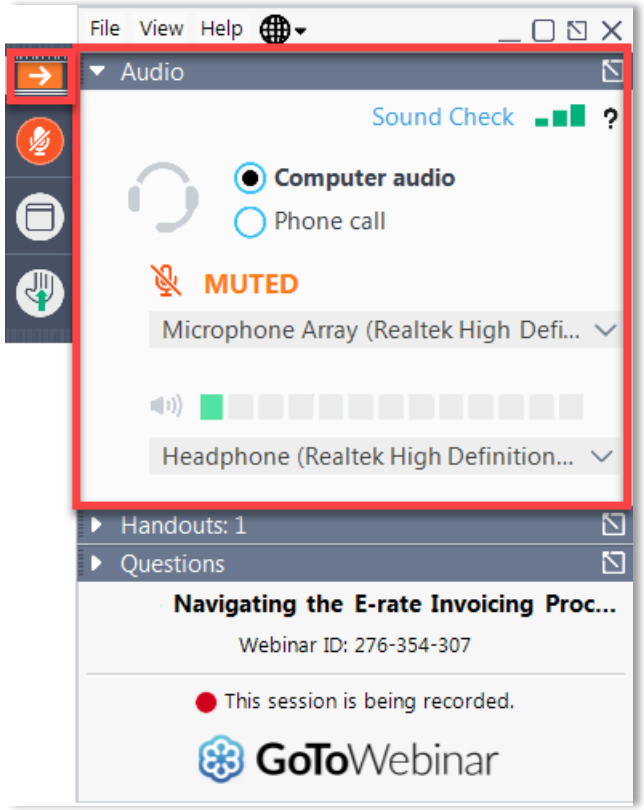
- Use the “Audio” section of your control panel to select an audio source.
- Choose one of the audio options:
  - Your computer's audio
  - Call in using an access code and audio PIN.
- The audience will remain on mute.



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- Use the “Sound Check” link and click question mark icon for audio help.
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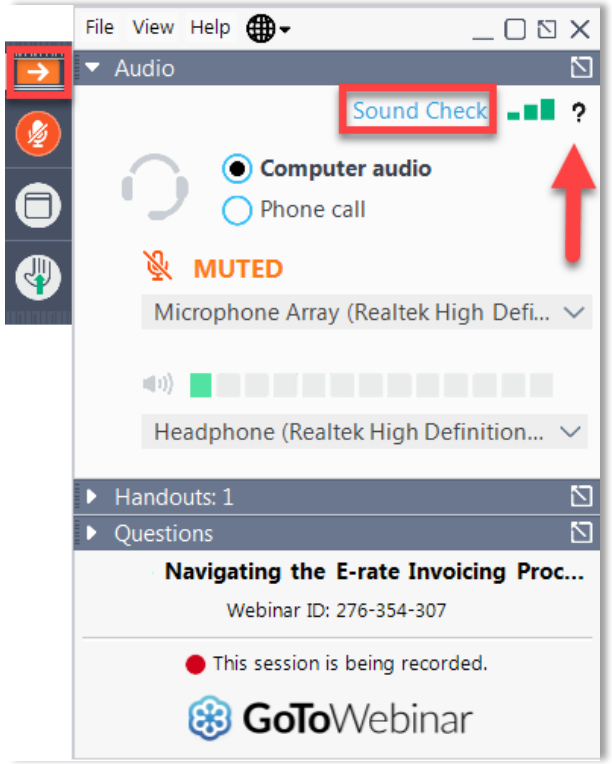
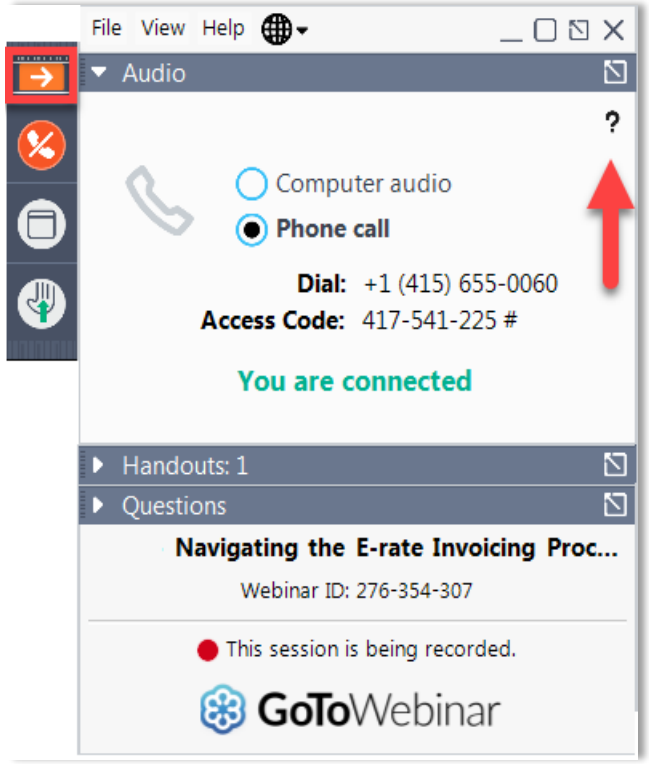
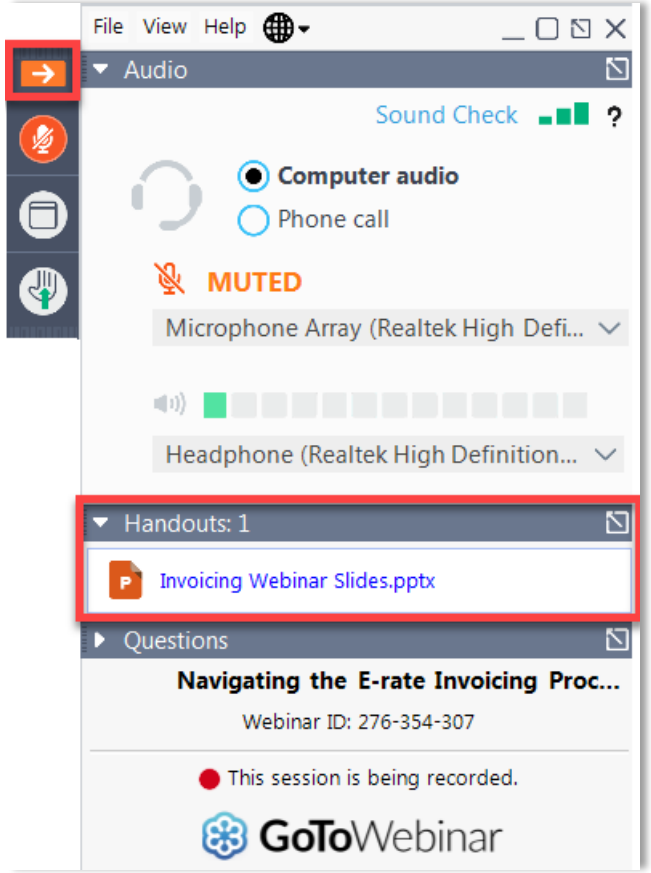




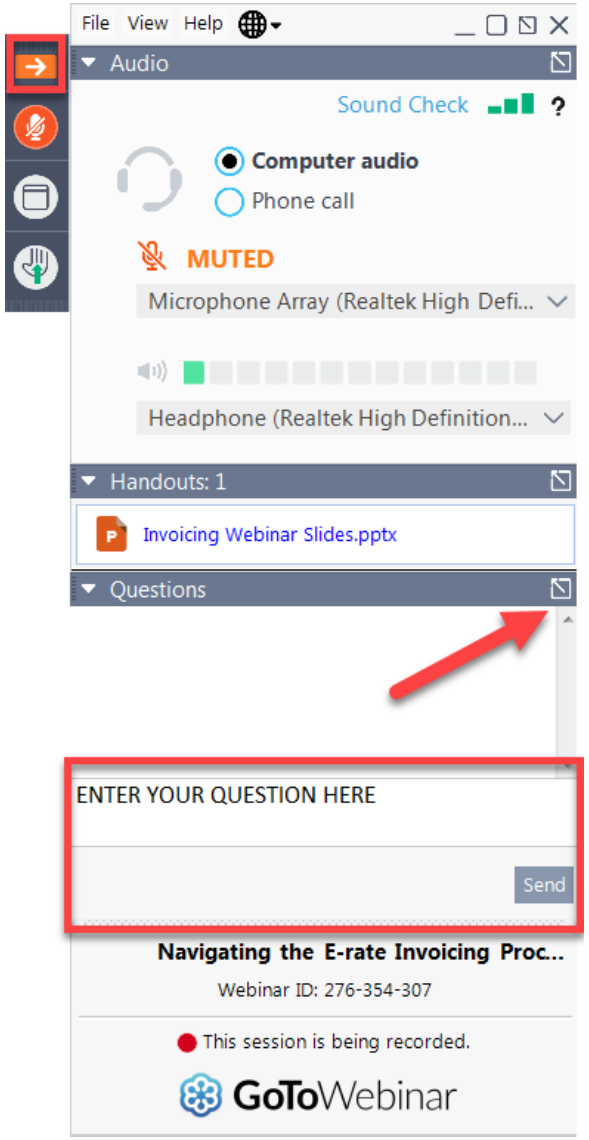
HOUSEKEEPING – RESOURCES

- The **slide deck** is available when you click the arrow to expand the "**Handouts**" tab.
- A recording of this webinar will be available after the event via the registration link.



HOUSEKEEPING – Q&A

- **There will be a live Q&A session focused on today's topics.**
- Tips for submitting questions:
  - Use the "Questions" box in your webinar control panel anytime during the presentation.
  - Click the box with the arrow above the questions box to expand it and see all written answers.
  - Write in full sentences.
  - Ask one question at a time.
  - Ask questions related to webinar content.



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1. Log in to EPC.
2. Select the **Contact Us** link from the upper right menu on your landing page.

MEET THE TEAM

Lisette LaForge

PIA Specialist | E-Rate program

Shawn Jensen

PIA Specialist | E-Rate program

Nkeshi Free

Communications Specialist | E-Rate

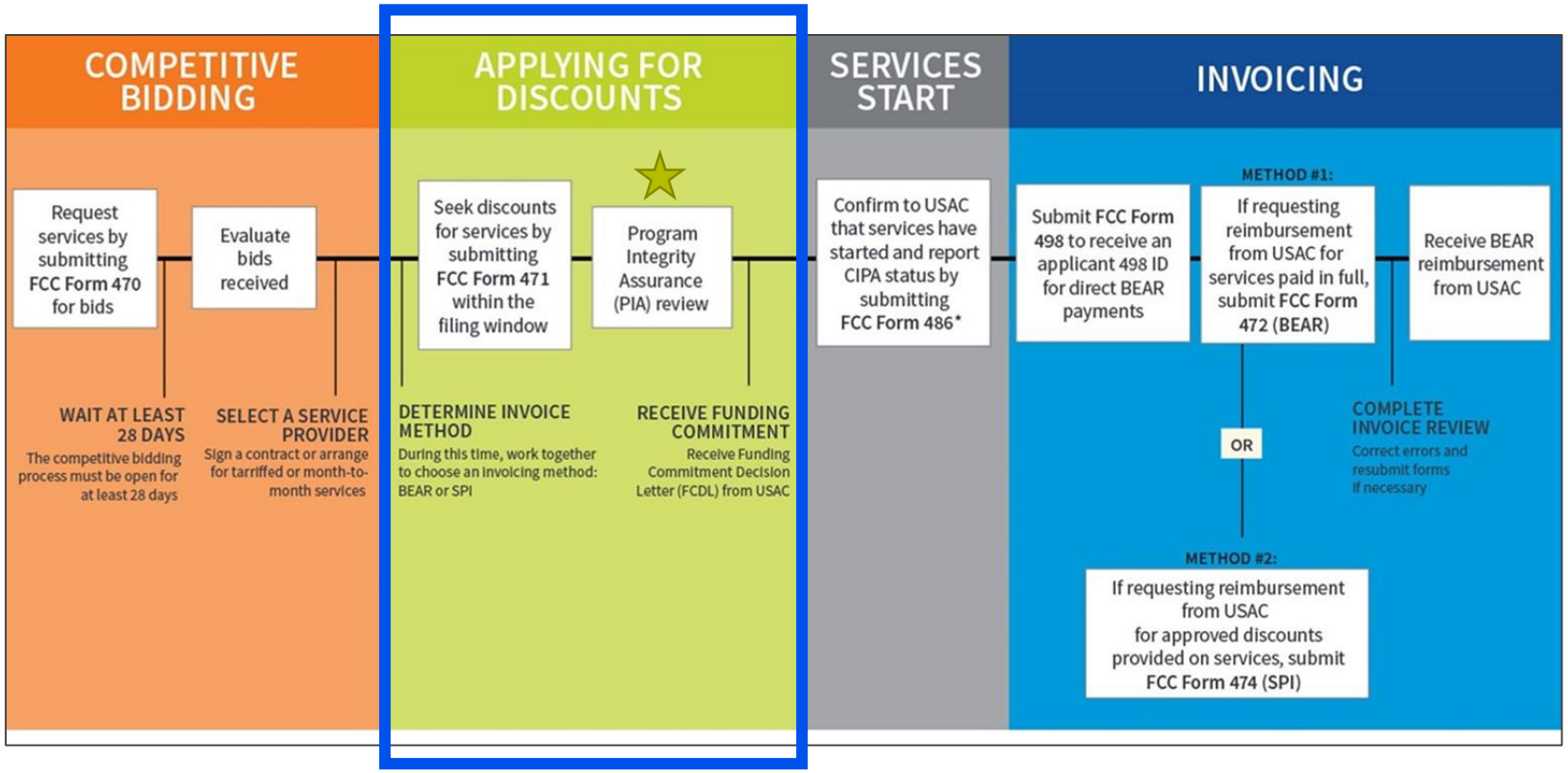
Agenda

- FCC Form 471 Review Process
- Preparing for PIA Review
- PIA Inquiries
- Selective Review
- Funding Decisions
- Q&A

FCC Form 471 Review Process

Program Integrity Assurance (PIA) Review

After applicants certify an FCC Form 471 within the filing window, PIA reviewers check the information on the form for completeness and accuracy.



Before your PIA Review - Review your FCC Form 471

- After certifying your FCC Form 471, and while you are waiting for your PIA review, you should double-check your filing for accuracy.
- If you find any information that should be corrected or updated, you can submit a Receipt Acknowledgment Letter (RAL) Modification Request.
- If you are using a new or existing contract on your FCC Form 471, you must have a contract **record** uploaded to your EPC profile.
  - To create that record, go to your organization page and click **Contracts**, then **Manage Contracts** and **Add a New Contract**.

PIA Review Details

- Your PIA reviewer may contact you to verify:
  - Eligibility of one or more of your schools or libraries.
  - Eligibility of the requested services.
  - Compliance with program rules.
- Additional information may be requested such as:
  - Vendor documentation that supports the funding request amount.
  - Supporting documentation that validates the requested discount percentage.
  - Supporting documentation that validates entity's eligibility for E-Rate funding.

FCC Form 471 Modifications

- As part of the review process, PIA reviewers may be required to modify information on your funding request.
  - For example: PIA reviewers may change student count, or service type based on the information available.
  - If a PIA reviewer discovers ineligible services in a funding request, applicants can ask to have them moved to a separate funding request or removed altogether.

FCC Form 471 Modifications

- IF PIA Reviewers modify information on your funding request, you will receive an EPC notification to alert you to the change.

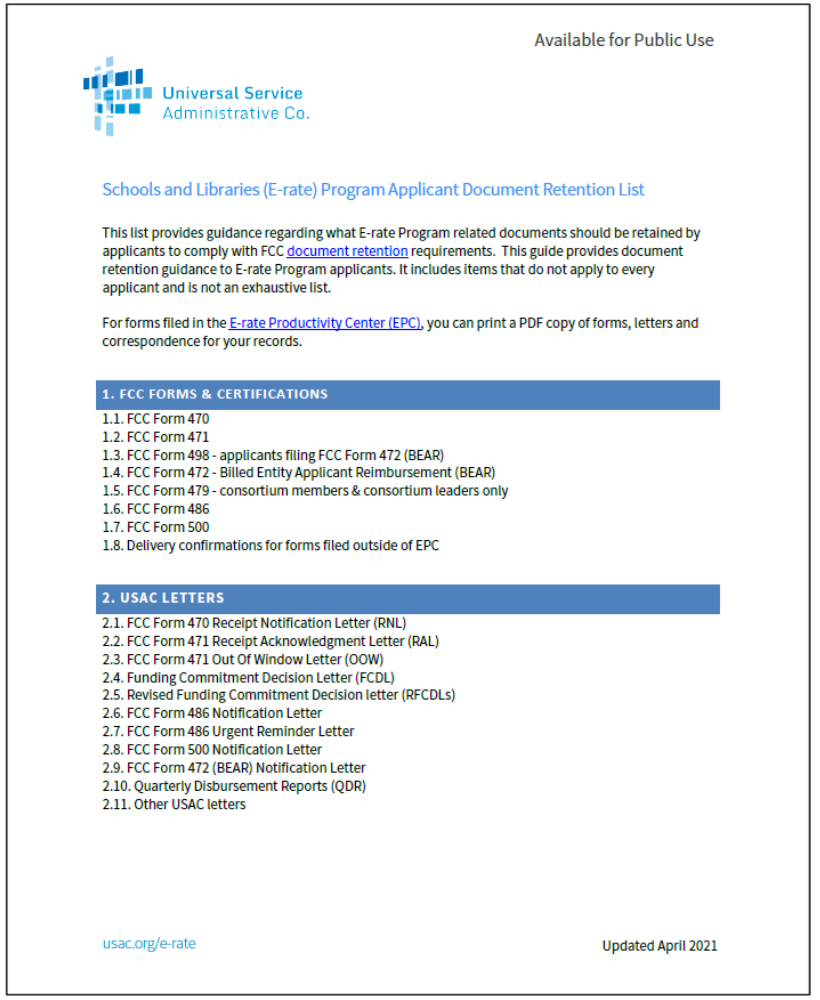
FCC Form 471 Status while under review

- While your form is under review, its status changes as the review process progresses.
- Your application may even revert back to a previous status.
  - This may occur due to the various levels of review involved.

Preparing for PIA Review

Organize Documentation

- Save and organize copies of all your documentation such as:
  - Competitive bidding documentation
  - Contracts
  - Network diagrams
  - National School Lunch Program (NSLP) documentation
- Use the E-Rate Program Applicant Document Retention List as a guide.



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Schools and Libraries (E-rate) Program Applicant Document Retention List

This list provides guidance regarding what E-rate Program related documents should be retained by applicants to comply with FCC document retention requirements. This guide provides document retention guidance to E-rate Program applicants. It includes items that do not apply to every applicant and is not an exhaustive list.

For forms filed in the E-rate Productivity Center (EPC), you can print a PDF copy of forms, letters and correspondence for your records.

1. FCC FORMS & CERTIFICATIONS

1.1. FCC Form 470
1.2. FCC Form 471
1.3. FCC Form 498 - applicants filing FCC Form 472 (BEAR)
1.4. FCC Form 472 - Billed Entity Applicant Reimbursement (BEAR)
1.5. FCC Form 479 - consortium members & consortium leaders only
1.6. FCC Form 486
1.7. FCC Form 500
1.8. Delivery confirmations for forms filed outside of EPC

2. USAC LETTERS

2.1. FCC Form 470 Receipt Notification Letter (RNL)
2.2. FCC Form 471 Receipt Acknowledgment Letter (RAL)
2.3. FCC Form 471 Out Of Window Letter (OOW)
2.4. Funding Commitment Decision Letter (FCDL)
2.5. Revised Funding Commitment Decision letter (RFCDLs)
2.6. FCC Form 486 Notification Letter
2.7. FCC Form 486 Urgent Reminder Letter
2.8. FCC Form 500 Notification Letter
2.9. FCC Form 472 (BEAR) Notification Letter
2.10. Quarterly Disbursement Reports (QDR)
2.11. Other USAC letters

usac.org/e-rate

Updated April 2021

Document Retention Requirement

Keep records relating to the application process for at least **ten years** after the latter of

- the last day of the applicable funding year or
- the service delivery deadline for the funding request.

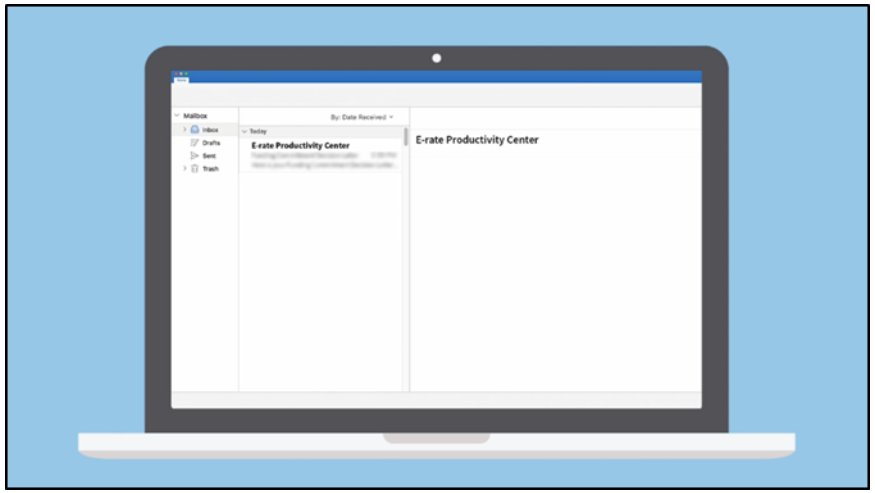
TIP: In your personal record keeping, use filenames and folder names that are specific and descriptive to locate them more easily.

Frequently Reviewed Items

- Common PIA requests for supporting documentation include:
  - Documents to validate entity information (e.g., surveys for alternative discount calculations)
  - Vendor documents such as: contracts, bills, vendor quotes, etc.
- PIA reviewers may also request information or other documents to help clarify FCC Form 471 entries.

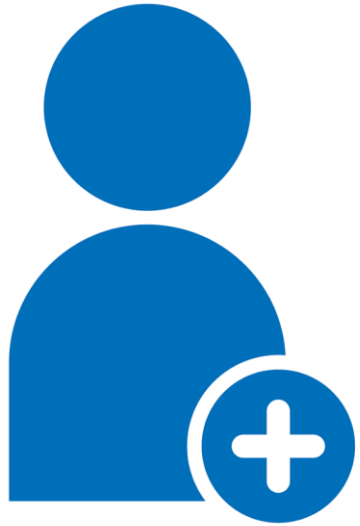
During PIA Review season

- The contact person identified on the FCC Form 471 should
  - Regularly monitor their email address and
  - Regularly check their EPC account for PIA review questions.
- Respond to any questions promptly



If you need to change your Contact Information

File a Receipt Acknowledgement Letter (RAL) Modification to update your holiday/summer/vacation contact information.



1. Within the FCC Form 471 record, navigate to **Related Actions.**
2. Select **Submit Modification Request (RAL)**.
3. Fill out the required information.

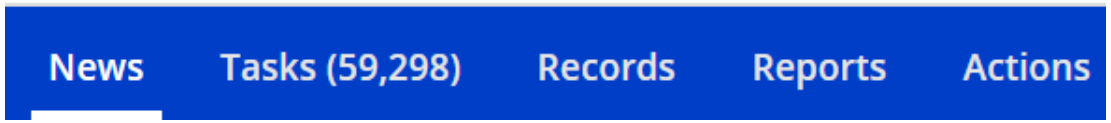
You can also file a RAL Modification to update other information in advance of PIA Review.

PIA Inquiries

Responding to PIA Inquiries

- To avoid delays, when you receive a PIA inquiry, you should provide:
  - Complete responses to all questions.
  - All requested documentation.
- Who can respond to PIA inquiries?
  - Applicants or authorized representatives of applicants
  - Service providers **can assist** applicants with PIA inquiries about services being provided.
- Contact your reviewer with questions.

PIA Inquiries – EPC News Feed



- You will be notified via email and your EPC **News** feed if a PIA reviewer requests additional information.
- The **News** feed item labeled, “From the FCC Form 471 Review Team” includes:
  - Today's date
  - Response due date
  - Contact name
  - FCC Form 471 application number

TIP: Search "471 Review Team" in the **News** feed to find notification(s)

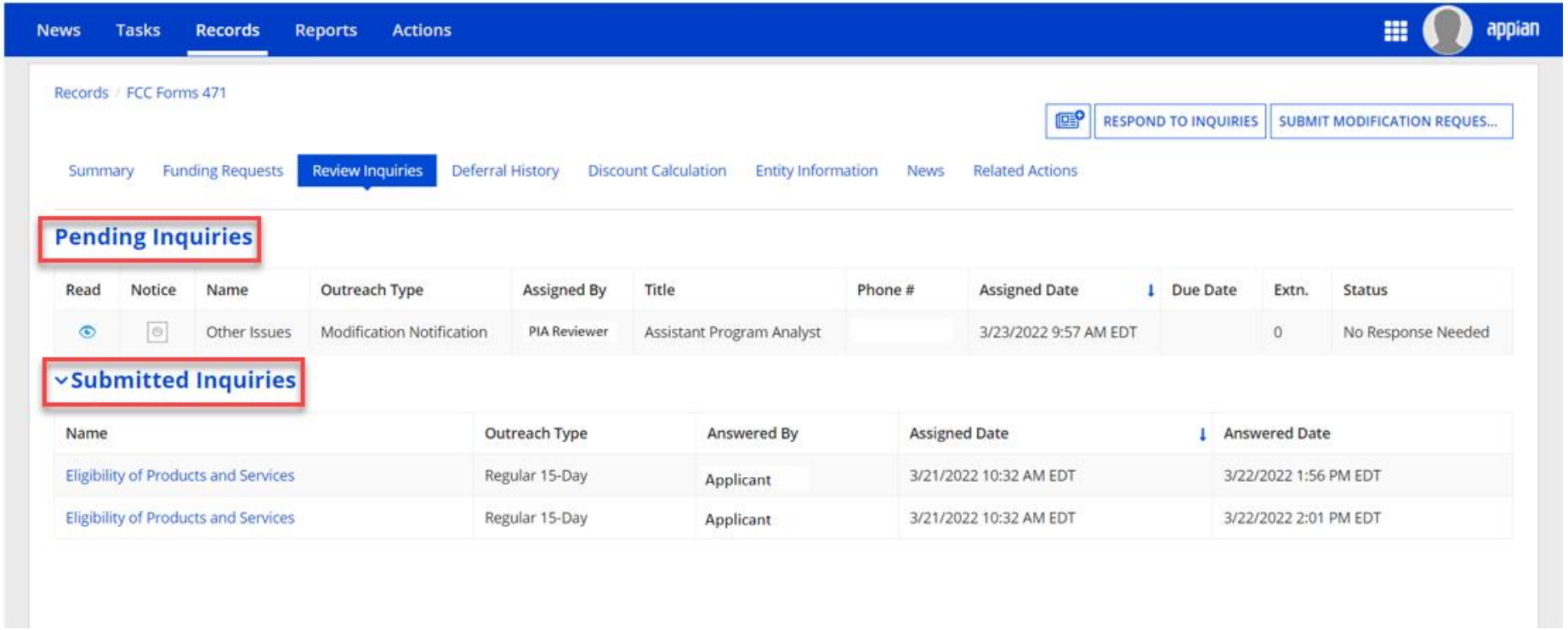
  - A brief description of the inquiry(ies)
  - Your PIA reviewer's name and telephone number
  - A hyperlink to your questions (the blue bar at the bottom of the notification)

To access PIA Inquiries in EPC

- View your PIA inquiries within the FCC Form 471 record:
  1. Navigate to **Review Inquiries**.
  2. Select **Respond to Inquiries**.
  3. Click on the blue hyperlink under **Name** to get to the actual questions.
     - Be sure to also read the information under **Outreach Type**.
- Requests for documentation
  - Select the **Submit** button after uploading documents.

PIA Inquiry Status

- The dashboard lists the status of the PIA outreach:
  - "Pending" inquiries are questions submitted by PIA to the contact person.
  - "Submitted" inquiries are responses you submitted to PIA.



Responding to PIA Inquiries

- You have **15 days** to respond to PIA inquiries.
- You may ask for one (1) seven-day extension, which is automatically granted.
  - Any additional extensions are considered on a case-by-case basis.

Requesting Additional Time

How to request an extension for your response:

1. Navigate to the FCC Form 471 in EPC.
2. Choose **Review Inquiries**.
3. Select **Request Extension**.

Tips for Responding to Inquiries

- Complete **all fields**; enter “N/A” when not applicable.
- Do not open the same inquiry in multiple tabs or windows.
- If you encounter “incomplete” items:
  - Answer the questions again and verify that all fields are populated.
  - If “incomplete” warnings persist, open a customer service case.

Tips for Responding to Inquiries

- How to address identical questions for an entity across multiple applications:
  - Provide the response on the first application.
  - For subsequent inquiries, you may direct the reviewer to the first application that contains the response.

Tips for Responding to Inquiries

- Contact your state E-Rate coordinator if you are having difficulty responding to or obtaining documentation for an inquiry relating to entity or discount validations.
  - Supporting documentation must show that the response came from the state E-Rate coordinator.

Selective Review

Selective Review

- After PIA Review, some applications undergo additional review.
- USAC may request more detailed responses than those that are required in PIA review.
- Selective reviews include all aspects of the competitive bidding process.
- This review is independent of other reviews conducted by PIA which may or may not still be in progress.

Selective Review

- USAC sends a **Selective Review Information Request (SRIR)** email to the FCC Form 471 contact to inform them that their entity has been chosen for selective review.
- The email provides information about how to submit a response and includes a link to access the SRIR in EPC.

Selective Review

If you receive a Selective Review Information Request (SRIR), you should:

- Confirm receipt of the SRIR by contacting the reviewer named in the request.
- Provide a complete response and all requested documentation to avoid delaying the review.
- Label each document with Funding Request Numbers (FRNs) and descriptions that identify them.

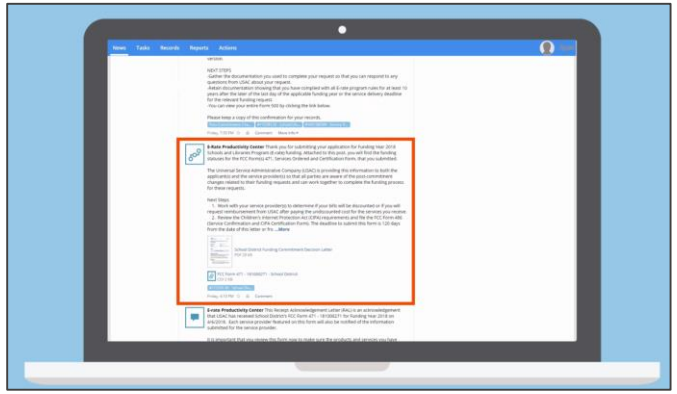
Selective Review

- Who can respond to SRIRs?
  - Applicants or authorized representatives of applicants
    - Service providers can assist applicants with the SRIR responses but cannot complete the SRIR.
- Contact your reviewer with any other questions.

Funding Decisions

Funding Commitment Decision Letter (FCDL)

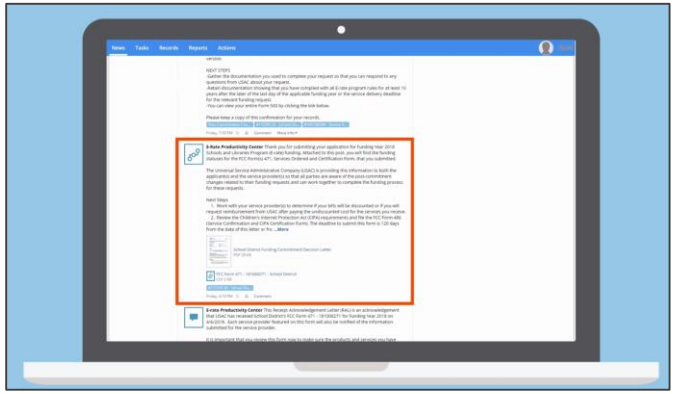
- When PIA review is complete, applicants and service providers receive a **Funding Commitment Decision Letter (FCDL)** – review it carefully!
- The FCDL includes:
  - Approved funding amounts.
  - Modified or denied funding amounts – along with the reason(s) for the changes.
  - Next steps in the E-Rate process.



Funding Commitment Decision Letter (FCDL)

FCDLs are delivered

- Via email
- In the **News** feed section of EPC



After Receiving the FCDL

- After the FCDL is delivered, applicants can:
  - Discuss service details with your service provider(s).
  - Once services have started, file the **FCC Form 486**.
- If applicants or service providers disagree with one or more of the decisions in the FCDL, they can appeal to USAC.
  - Appeal within 60 days of the date of the letter.
  - Decisions on appeals are delivered via **Revised Funding Commitment Decision Letters (RFCDLs)**.

HOUSEKEEPING – Q&A

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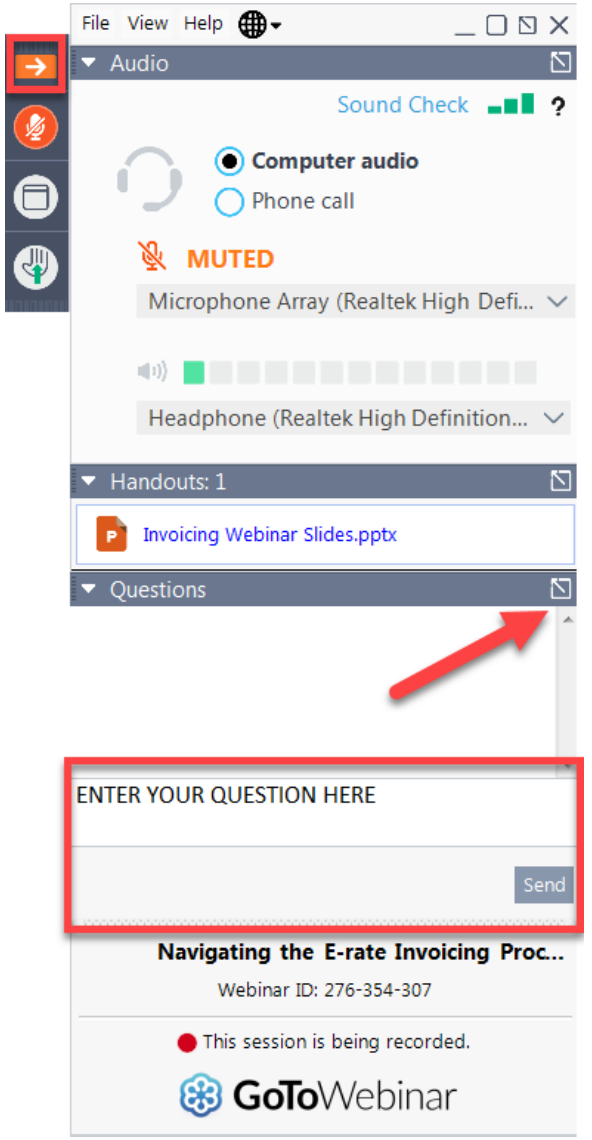
  - Click the box with the arrow above the questions box to expand it.
  - Ask questions related to webinar content.



Questions?

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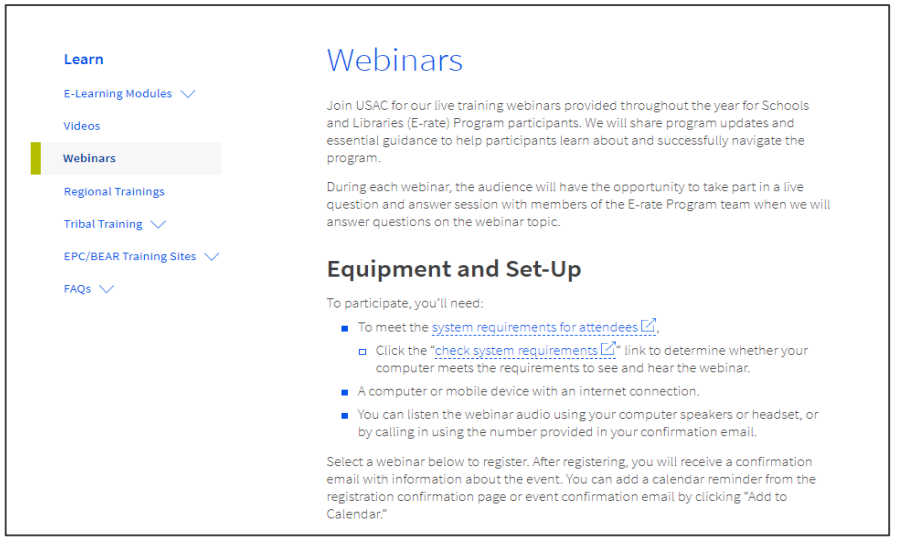
Check the E-Rate Webinars page for updates on future webinars.

For additional information subscribe to the E-Rate News Brief



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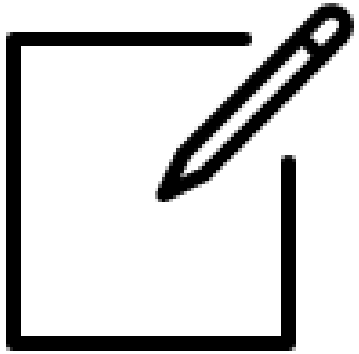

- We want to hear about your webinar experience.
- A survey will appear on your screen at the end of this webinar.
- If you are unable to complete the survey at the end of the webinar, please expect an email from USAC E-Rate Outreach Team with a unique survey link in 1-2 business days.
- We appreciate your feedback!

Thank You!

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