Fall FY2025 E-Rate Veteran's Workshop

Lorrie Germann, State E-Rate Coordinator

Thanks for joining us, we'll get started at 9:00

For a copy of today's handout, go to https://www.ohio-k12.help/erate/e-rate-resources/

Lorrie Germann, State E-Rate Coordinator

Agenda for Today

- **Completing FY2023** – Slide 4

- **Where Are You At For FY2024** – Slide 11

- **Preparing For FY2025** – Slide 14

- **What's New For FY2025 - Program Updates** – Slide 19

- **Application Process Reminders** – Slide 41

- **Cybersecurity Pilot Program** – Slide 47

Completing FY 2023 *(July 1, 2023 – June 30, 2024)*

BEAR Reimbursement Deadlines

- BEAR Form 472 – Form that must be submitted within 120 days of last date to receive service or equipment
- **For FY 2023 *recurring* services**
  - October 28, 2024 is the invoicing deadline
    - Last date to receive service was June 30, 2023
- **For FY 2023 *non-recurring* purchases**
  - September 30, 2024 was last date to receive/install equipment
 - Jan 28, 2025 is BEAR deadline

Requesting an Invoice Deadline Extension

- If you cannot make the BEAR deadline, OR if your BEAR was submitted but has not yet been paid, file for an Invoice Deadline Extension (IDER)
- IDERs <u>must</u> be requested by the invoice deadline (Oct. 28)
- Extension will be approved automatically for a single, 120-day extension
  - Cannot request a second extension
  - Approvals are shown on the screen and also will be e-mailed
- Invoice Deadline Extension Request Filing Guide at:
  - https://www.ohio-k12.help/e-rate-support/resource-library/

New BEAR System – Awesome

- On November 7, 2023, USAC migrated E-rate BEAR functionality into EPC
- Now, when you log into EPC, you will see this grid (waffle) symbol in the upper right corner of the Landing Page which will take you to the new E-rate BEAR Portal
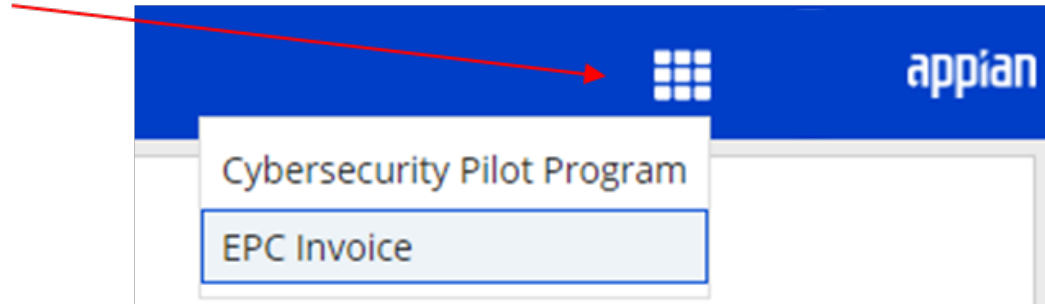
- For a new BEAR Filing Guide, visit: https://www.ohio-k12.help/e-rate-support/resource-library/
- Must have BEAR access under User Permissions to submit BEAR
  - Existing permission should have been ported over from old system
  - Only EPC AA can grant this access

- You'll see it looks almost identical to the ECF invoicing system

What Changed?

- Error checks
- Can enter multiple FRNs and multiple SPINs on the same BEAR
- Tabs for Submitted Forms, Pending Tasks, Pending Inquiries
- Ability to upload vendor invoices with BEAR
  - Not required, but because USAC often requests these during invoicing review, it's a good idea to upload to save you time later (C2, mainly) and to have a record of it in the EPC system
- Real-time status reports by FRN Line Item in EPC:
  - Incomplete, Certified, Processed, Cancelled
- Ability to see date BEAR was paid
- Better invoicing decision explanations
- Biggest pitfall remaining is selecting the right funding year so you see the correct FRNs

New - Invoice Disbursements Data Lookup Tool
- Shows details for all *disbursements* authorized since July 2016
  - Does not show pending invoices

https://opendata.usac.org/E-Rate/E-Rate-Invoice-Disbursements-Data-Lookup-Tool/t3vg-gfse

Invoice Review: Service Certification

Whether you filed a BEAR or your Service Provider discounted your bills and filed a SPI, USAC may conduct manual reviews that require additional documentation to demonstrate:

- The applicant paid their **non-discounted** costs.

- The invoiced equipment or services were **delivered** and/or **installed.**

- USAC validates the documents to ensure the requested amount is for eligible equipment and or services.

USAC reviewers may send questions to the applicant or service provider with a response due by the "response requirement date."

Applicant and service provider should be **timely in responding to outreach** as failure to respond may result in the invoice being **denied**.

Only an applicant with full user rights completes the certification and returns it directly to USAC.

Service Certification – Example Email

Verbiage sent in the EPC outreach window regarding request:
Please see the attached service certification that I am requesting in order to complete an invoice request from your service provider. Please ensure an authorized party review and signs, returning the signed document timely for review. if you have any questions. please contact me.
Thank you for you cooperation and continued support of the Universal Service Program.

SERVICE CERTIFICATION

Please also provide the attached Service Certification form. **Only an authorized representative of the applicant (school/library) (with "Full" rights for BEAR/472 permission or the account admin rights in the E-Rate Productivity Center (EPC)) is authorized to complete, sign, and send this form to USAC.**

The form must be completed in order to be valid documentation.

Service Certification **must** include:

1.) The Representative/Contact Name, Title, and Phone of Applicant (School/ Library):

- The contact name should match as signatory.
- If the signatory is any other than the Representative/Contact Name identified on the form, please provide the full Name, Title and Phone Number of the signatory and a reason for the mismatch.

2.) Date Goods/Services Delivered: except for installation only invoice, required for all other products/services delivered.

3.) Date Goods/Services were or will be installed. Required only for non-recurring services (products that need installation). This date is required regardless of the party providing the installation.

4.) Date Applicant Portion Paid and Check No., or Date to be Paid: This is required.

5.) If services are not yet delivered, please provide a contract to indicate provision for up-front charges.

6.) Signed and dated: by the authorized Applicant contact.

Note: By signing this Form you are authorizing that:

- Equipment and services requested are approved on the FCC Form 471.
- Unit cost and quantity per location do not exceed the amounts approved on the FCC Form 471.
- All equipment has been delivered/ installed at Recipients of Service (ROS) locations approved on the FCC Form 471 listed on the date provided on document.

Please note: Service Certification forms are Invoice number specific. Due to audit requirements, the re-submittal of an earlier Service Certification form is not acceptable and will result in rejection of the current invoice line(s).

Service Certification – Example Form

Verbiage sent in the EPC outreach window regarding request:
Please see the attached service certification that I am requesting in order to complete an invoice request from your service provider. Please ensure an authorized party review and signs, returning the signed document timely for review. if you have any questions. please contact me.
Thank you for you cooperation and continued support of the Universal Service Program.

Applicant Service Certification for E-Rate Invoices

#	Field	Value
1	Invoice Number	«SLD_Invoice_No»
2	Invoice Line Number	«Line_ID»
3	Service Provider Name / Service Provider SPIN	«Service_Provider_Name» «SPIN»
4	Service Provider Invoice #	«SP_App_Invoice_No»
5	Undiscounted Invoice Amount	«Undiscounted_Amt»
6	Discounted Invoice Amount	«Discounted_Amt»
7	Applicant Name	
8	Applicant Authorized Representative / Contact Name & Title	
9	Applicant Authorized Representative / Contact Phone	
10	Billed Entity Number (BEN)	«BEN»
11	471 Number	«FORM_471»
12	FRN	«FRN»
13	Date Goods/Services Delivered	
14	Date Goods/Services Installed	
15	Date Applicant Portion Paid and Check No. or Date will be paid	

By signing below, you, the Applicant certify that:

A. I am authorized to represent the above-named Applicant.

B. The equipment/services described on the attached vendor invoice(s) have been delivered as indicated on row 13 above.

C. For FRNs which include installation, of the equipment/services described on the attached vendor invoice(s), provide the installation date. This is required only for non-recurring services (products that need installation) and paid for with E-Rate funds have as indicated on row 14 above

D. The equipment and services described on the attached Service Provider invoice meets the following criteria: (*Copy of detailed vendor invoice must be attached*)

- Equipment and services requested are approved on the FCC Form 471
- Unit cost and quantity per location do not exceed the amounts approved on the FCC Form 471
- All equipment has been delivered/ installed at ROS locations approved on the FCC Form 471 listed on the date provided above

Applicant Authorized Representative Name _____

Applicant Authorized Representative Signature_____

Date _____

E-Rate / Revised 10/16/2023

FY 2024 *(July 1, 2024 – June 30, 2025)*

Where Are You At In The Process

Status of Ohio FY 2024 FCDLs

- 3093 FRNs submitted totaling $87.7 million
  - $67.6 million committed thus far (2874 funded FRNs)
  - $31.2 funded for Category 2
  - 209 FRNs still "pending" for 65 entities
    - Requesting about $12.7 million
    - 5 FRNs - Awaiting Heightened Scrutiny
    - Let me know if no PIA contact has been received in the last 3 weeks
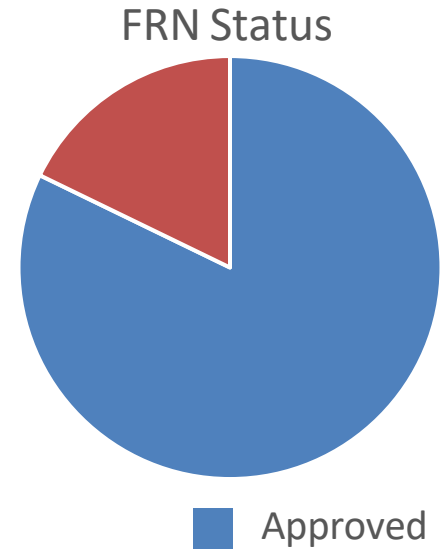
- Of the funded 2874 FRNs, 424 still need a Form 486 filed!

FRN Status

Approved

If you've had a post-commitment (SPIN changes, service substitutions, appeals) change request or BEAR form pending more than 60 days, use the "Contact Us" feature in EPC to request that it be escalated.

FY 2024 FCDLs – Has Everything Been Funded

- If your Form 471 applications have not been funded
    - What is the current status?

- If you've received the FCDL, were there unexpected denials?
    - Remember, you have 60 days from the date of the FCDL to file an appeal!

FY 2024 Form 486s

- If you have been funded for FY 2024, file your Form 486 to "turn-on funding" and certify CIPA compliance
    - For internal connections, file 486 now (don't wait)
- You must wait until you receive an FCDL to file the 486
- Deadline is 120 days after FCDL date or October 29, whichever is later
    - Normally Oct 29
- VERY easy form to file in EPC (no data entry)
    - Guide at: https://www.ohio-k12.help/e-rate-support/resource-library/
    - Be careful when clicking on CIPA certifications

TIP!

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Preparing For FY 2025 *(July 1, 2025 – June 30, 2026)*

FY 2025 "Admin Window"

- Admin Window is 2-3 months _before_ the Form 471 window when schools and libraries update their school or library profiles in EPC portal
  - It opened on October 15. It usually closes two days before the Form 471 filing window opens in January (we don't have the dates yet!).This data is then ported over into the Form 471

- **Mainly used to update:**
  - **E-Rate Discounts**: Must update school profiles with current enrollment/NSLP data to calculate E-rate discounts for upcoming year
  - Confirm all entities, including NIFs, are in EPC portal
  - **Category 2 Budgets**: Update enrollment (schools) and square footage changes (libraries) – but ONLY if it will increase the Category 2 budget
    - Category 2 enrollment data can be _different_ from annual discount-rate enrollment data
      - Doesn't have to be updated each year
    - C2 enrollment data entered in separate location in EPC

    >>> EPC Landing Page > School Name > Manage Organization > Scroll to the bottom of the page to see the Category 2 Enrollment field. Repeat for each school in the district that needs to be updated.

What Enrollment & NSLP Data To Use

- Most use the student/NSLP counts reported to ODE's **Office of Child Nutrition** for October, published in the annual MR-81 report.

- **For FY2025, we will use the October 2024 version (or you may use your most current data if you choose).**

- **DEW (f.k.a. ODE) does not release the full MR-81 until early/mid-February (after the close of the Admin window), so ask your cafeteria director what was reported to ODE for October if you're not participating in CEP!**

- **DEW sent me an updated MR-81 with all schools that are approved for CEP, including sites that applied in April 2024. The document also includes the "Base Year" information.**
  - **Note: The Direct Cert percentage required to qualify for CEP was lowered from 40% to 25%, so more schools are participating. For a copy, go to https://www.ohio-k12.help/e-rate-support/resource-library/**

- You may also use counts from a Monthly Site Claim Form, CN-7 report, **survey**, etc., *but data obtained before filing the Form 471 application*.

- If your counts are different from the counts listed in the MR-81, you will be asked how you determined the information. **Be sure to document how you arrived at your total numbers.**

MR-81 Information – Which Numbers to Use

Non-CEP schools/districts use Enrollment and Free/Reduced counts:

Site IRN	Site Name	NSLP Provision	Enrollment	Total NSLP (Free/Reduced) Price Lunch Applications
00033936	North Adams Elementary School	Traditional	651	368
00033944	North Adams High School	Traditional	458	213
00070425	Ohio Valley Career & Technical Center	Traditional	338	190

CEP schools/districts use Enrollment, CEP Identified %, and update Base Year, if needed:

Site Name	Base Year	Enrolled Students	CEP Eligible Student Count (Direct Certified)	CEP Identified % (Number to use in EPC if school participates in CEP. The 1.6 factor will be applied to calculate the NLSP %)
Chillicothe High School	2022	1,225	512	41.80%
Chillicothe Intermediate School	2022	678	396	58.41%
Chillicothe Primary School	2022	485	324	66.80%

Note: If two or more schools share a cafeteria, counts are combined and listed under the name of one of the schools. You will need to split the counts out to report in EPC. If using CEP, split the enrollment by building, but use the same CEP % of each.

EPC Portal FAQs/Known Issues

What web browsers should I use to receive the MFA code and access USAC systems?

Ensure that you are using Google Chrome, Firefox, or Microsoft Edge web browsers to receive an MFA verification code. It is important to adjust your cookies and cache settings to prevent a "Log in Loop" which would take you back to the login homepage. You will need to clear your cookies and cache and allow third-party cookies in your web browser settings. Do not use Google Chrome incognito mode or private windows.

I am receiving a "AuthSdkError: The JWT was issued in the future" error message when trying to log into the USAC system. How do I resolve this issue?

Ensure that the time on your company or personal computer is accurate. If your computer's time is slow or fast by 2+ minutes, the error message below will appear, or a delay in receiving the MFA verification code via email will occur until the time is correct.

I am receiving a "AuthSdkError: Unable to parse a token from the url" error message when trying to log into the USAC system. How do I resolve the issue?

Ensure that you are using a Google Chrome, Firefox, or Microsoft Edge web browser, clear your cache, and allow third-party cookies. If you continue having the issue, take the following steps:

- Click on the URL bar at the top of the browser to highlight the entire web address.
- Press and hold the 'CTRL' key on your keyboard. While holding the 'CTRL' key, press the 'F5' key once to perform a hard refresh.

What's New For FY2025?

FY2021 – 2025 Cat Two (C2) Budget

FY2025 is the last year of the FY2021-2025 Funding cycle.

- Unused funds from the FY2021 – 2025 Category Two (C2) budget will not roll over to the next budget cycle.

- Recapture your unused funds to make them available for your FY2025 Funding Requests (FRNs)

- **Next steps:**

  - View available FY2021-2025 C2 Funding using the Category Two (C2) budget tool

  - Identify unused funds, i.e., committed but not disbursed and are beyond their Invoicing Deadline Date (IDD) using the E-Rate FRN Invoice Deadline Tool

  - Submit an FCC Form 500 to reduce commitments of unused funds by Q1 of 2025 making unused funds available for FY2025 FRNs

Calculating Remaining C2 Budgets –
Using USAC's Open Data

What is your remaining Category 2 Budget for this C2 cycle?
1) Go to: https://opendata.usac.org/E-Rate/E-Rate-C2-Budget-Tool-FY2021-/8z69-hkn7

2) Enter BEN to filter just your entity's data

3) Summary Table will appear

Review these columns:

Filters (2) ✕

Clear All

State
OH ⌄

Applicant Type
Select... ⌄

City
Select... ⌄

Billed Entity Name
Select... ⌄

BEN
129999 ⌄

Consulting Firm Name (CRN)
Select... ⌄

C2 enrollment currently in EPC

5-Year Pre-Discount C2 Budget

Full Ti... ⋮	Library... ⋮	School... ⋮	Library... ⋮	C2 Bud... ⋮	C2 Bud... ⋮	Funded... ⋮	Pendin... ⋮	Availab... ⋮
1,605		$167.00		$268,035.00	Confirmed	$207,881.00	$0.00	$60,154.00

"Funded" amount from FY2021-FY 2023

Amount of "pending FRNs" in FY 2021, 2022, 2023

Remaining available C2 Budget

Clicking on the district's (Billed Entity) name will take you to the district's "Organization Detail" summary page.

Category 2 Budget Tool

- Start my clicking on the Billed Entity under "My Entities".

- Click on "Category 2 Budget" and then "Get Category 2 Budget Information". You will see any requests since FY2021 and the Remaining Budget.

- Click on "View Details" to see the breakdown by funding year.

Hot Spot Lending

- Beginning FY 2025, Wi-Fi hotspots/services are eligible for E-Rate discounts for students, teachers and library patrons who otherwise would not have Internet access off campus
- Subject to per device/service plan caps and 3-year funding caps
- Warehousing of hotspots not permitted
  - Also not permitted - buying for future use or to be stored in case of an emergency, theft, loss, or breakage
- **If you have ECF-funded hotspot devices, use those for warehousing, or to replace a stolen/lost/broken device!**
- CIPA (filtering) compliance is required **<u>if</u>** the hotspot is being used with a school or library-owned laptop/device
  - **Note: If a school owns the laptop but a library patron is using a library-issued hotspot, filtering will be the school's responsibility, not the libraries.**
- No unmet needs survey or data collection required like ECF
- 1:1 initiatives are prohibited
- All E-Rate competitive bidding rules apply

Eligible Hot Spot Equipment

- "Wi-Fi hotspot" as a device (sometimes referred to as a "mobile hotspot" or "portable hotspot device") that is intended to provide Wi-Fi connectivity to a hotspot user as its sole function
- Requirements:
  - Must be portable
  - Must be a single device (not a set of linked devices)
  - Must work with commercially available mobile wireless internet
    - Not eligible if used with CBRS or other private network services
  - Multi-functional devices not eligible
    - E.g., smartphones, PCs, notebooks, tablets, customer premises equipment, routers or switches, and wireless access points
  - Each Wi-Fi hotspot device must be associated with an E-Rate line of service for that funding year
    - Service-only may be requested if you already own the device

Hotspot/Service Cost Caps

Pre-discount cost limitations (caps):
- **Recurring wireless Internet service: $15/month**
- **Wi-Fi hotspot: $90/device**

- Activation and configuration costs are included in the capped amounts

- Taxes are <u>not</u> included in the capped amounts
  - All taxes and fees should be requested on separate Form 471 funding request line items and separately identified on invoices

- Applicants are permitted to select a Wi-Fi hotspot or service that costs more than the funding caps, but E-Rate commitment amounts will not exceed the funding caps

3 Year Budgets - Overview

- **3-Year Budget Cap:** <u>Pre-discount</u> combined hotspot/service budget, limiting the amount of E-Rate support that can be requested over 3 funding years

- Applicants may request up to 45% of their 3-year budget in a single funding year
  - The hotspot budget cycle will be FY 2025 – FY 2027 and a new budget cycle will be established beginning in FY 2028

- No set limit to the quantity of plans, as long as it's not more than 45% of the 3-year budget

- If you use less than 45% in any given funding year, you don't get more than 45% in a future funding year

3 Year Budgets – Schools

School 3-Year Budget Calculations:

[student count x (20 hotspots/100 students) x C1 discount rate] x $630

Example: A school district with 14,550 students and a 40% discount rate would have a 3-year, pre-discount budget of $737,100, calculated as [14,550 students * 0.2 * 0.4] * $630 = $737,100

- The school could request up to $331,695 (pre-discount) each year, which is 45% of 3-year budget

A	B	C	D	E	F	G	H	
FY 2025 C2 Student Enrollment	School Multiplier	FY 2025 E-rate C1 Discount	(a*b*c)	Rounded up to Nearest 10	3-year multiplier - $630	Hotspot 3-Year Pre-Discount Budget ($630 * E)	Most Pre-Discount You Can Request in Any Year - 45% of 3 Year Budget	
1010	20%	90%	182	190	$630	$119,700	$53,865	*Example A*
14550	20%	40%	1164	1,170	$630	$737,100	$331,695	*Example B*

- *The $630 is calculated as $630 ($90 hotspot cap + (36 months x $15 service cap)).*

- *For a copy of the Budget Calculation Tool, go to https://www.ohio-k12.help/e-rate-support/resource-library/*

3 Year Budgets – Libraries

Library 3-Year Budget Calculations:

[C2 square footage x C1 discount rate x 0.0055] x $630

Example: A library with 3200 square feet and a 90% discount rate would have a 3-year, pre-discount budget of $12,600, calculated as [3200 * .0055 * 0.9] * $630 = $12,600.

- The library could request up to $5,670 (pre-discount) each year, which is 45% of 3-year budget
- Fill in yellow cells to see your 3-year hotspot budget and 45% calculations

	A	B	C	D	E	F	G	H	
	FY 2025 C2 Square Footage	5.5 hotspots per 1,000 square feet	FY 2025 E-rate C1 Discount	(a*b*c)	Rounded up to Nearest 10	3-year multiplier - $630	Hotspot 3-Year Pre-Discount Budget ($630 * E)	Most Pre-Discount You Can Request in Any Year - 45% of 3 year budget	
	18,951	0.0055	70%	73	80	$630	$50,400	$22,680	Example C
	3,200	0.0055	90%	15.84	20	$630	$12,600	$5,670	Example D

- *The $630 is calculated as $630 ($90 hotspot cap + (36 months x $15 service cap)).*

- *For a copy of the Budget Calculation Tool, go to https://www.ohio-k12.help/E-Rate-support/resource-library/*

AUP Requirements

Acceptable Use Policies (AUPs)

- Applicants must adopt, maintain and publicly post their AUP
- Libraries are not required to collect signed documentation of user compliance with their AUP like they did with the ECF program.
- **School** AUPs must clearly state:
    1) The school's hotspot lending program is being provided only to students/school staff and/or library patrons who need broadband access while off campus
    2) The off-premises use must be primarily for an educational purpose
    3) The usage of loaned hotspots must be "integral, immediate, and proximate to the education of students
- **Library** AUPs must clearly state:
    1) The library's hot spot lending program is being provided only to library patrons who need broadband access while off premise
    2) The off-premise use must be primarily for the "integral, immediate, and proximate to the provision of library services to library patrons.
- Schools and libraries are also expected to implement content and user network restrictions consistent with the restrictions that they place on their building-based networks, and to adopt/update AUPs and other policies to limit access

Non-Usage Requirements

- Rules contain strict non-usage vendor notification and disconnect requirements
- Vendors are required to provide data usage reports in machine-readable digital format, so that the information lines can be read and sorted, clearly identifying the lines that are not being used
    - Schools and libraries must regularly review these reports to identify hotspots with periods of non-usage to determine if there is an issue with the device or to seek the return of a Wi-Fi hotspot after some period of non-use so the device can be loaned out again
- Specifics:
    - At least once every 31 days, service providers are required to identify lines of service that have gone unused for no less than 60 days
    - Upon determining a line of service has not been used for 60 days, service providers will have 5 business days to issue a notice to the applicant of such non-usage
    - Applicants will have 30 days from the date of the service provider's notification to begin using the services or the line of service will be terminated by the service provider
    - Lines of service that have no data usage for 3 consecutive months *must* be terminated by the service provider

Record Keeping Requirements

- Just like ECF, the E-Rate hotspot rules will require applicants to create and maintain an asset and service inventory for all E-Rate-funded hotspot devices/services

- The inventory must include:

  1) Equipment make/model

  2) Equipment serial number

  3) Full name of the person to whom the equipment was provided (**not required for libraries**)

  4) Dates the equipment was loaned out and returned

  -- Or the date the school/library was notified that the equipment was missing, lost, or damaged

  5) Service detail, including the line number or other unique identifier that associates a device to that particular line of service

Additional Details

- **Length of Lending Periods:** The FCC declined to specify a length of lending periods and how to target the appropriate students and library patrons

  - They are leaving this up to to the applicant to determine and tailor the hotspot lending program to their local needs

- **Priority of Funding:** In the event that demand for E-Rate support exceeds available funding, hotspots/service FRNs will be funded <u>after</u> Category 1 and Category 2 requests (just like school bus Wi-Fi FRNs)

- **No User Access Restrictions:** To avoid unnecessarily penalizing those applicants with technical limitations and to provide applicants with flexibility, the Order does not require schools and libraries to implement specific user access restrictions *at this time*

  - However, to the extent schools and libraries already restrict access to their networks and devices, they are expected to continue to implement content and user network restrictions.

Additional Details

- **3-Year Lifecycle:** Wi-Fi hotspots are likely to have a shorter lifecycle and, therefore, can be disposed of after 3 years instead of the usual 5-year disposal rule for other E-Rate-funded equipment.

- If a vendor disconnects due to 90 days of non-usage, you can restart service one time/funding year
  - However, applicants can expect additional PIA reviews

- In the event of a terminated line of service resulting from the non-usage requirement, service providers are prohibited from billing the applicant for the balance that was not paid for by the E-Rate program

- Plan to apply for hotspots on separate Form 471 than other C1 requests

Bus Wi-Fi - Equipment and Service Eligibility

- All school bus Wi-Fi equipment, mobile service, and installation will qualify as Category 1.

- Eligible equipment includes modems, routers, antennas, and their installation.

- Maintenance and operation services are not eligible.

- Schools may enter into service contracts with multiple service providers, but only applicants with a rural designation can request E-Rate funding for multiple service providers for the same bus.

- When buses are not being used for educational purposes, the Wi-Fi must be disabled. This includes renting buses for private and for-profit events, as well as after-hours community usage (parking buses for community Wi-Fi).

- Content filtering and user network restrictions are required consistent with the school's Acceptable Use Policy for internet usage inside school buildings.

- There is no monthly minimum usage requirement as long as the equipment is installed, and the service is activated. **This includes the summer months when buses are not being used.**

- **When requesting on the Form 470, an RFP is no longer required.**

Changes to the FY2025 Form 470

- **Ability To Upload RFP and RFP Documents After Certification**.
  - Applicants can upload an RFP (request for proposals) after the FCC Form 470 is submitted and certified in EPC but cannot remove RFP documents attached to your Form 470.
  - If the new RFP changes the service originally requested (increasing bandwidth or quantities), you can restart the 28-day waiting period; there is no need to refile!

- **Ability To Cancel FCC Forms 470 and View Canceled Forms**. Applicants can view canceled FCC Forms 470 in EPC under **Records -> FCC Forms 470** by selecting "Canceled" under the **Status** filter.

- **Wi-Fi Hotspot Devices/Wireless Internet Services for Off-Premises Use and Bus Wi-Fi added as services**.

Cat 2 Mixed Functionality – IC & BMIC

Some equipment/licenses have **mixed** BMIC & Internal Connections (IC) functionality.

**This is typical when requesting renewal licenses!!

- Some vendor licenses may include both **BMIC** & **IC** functionality such as **Right-to-Use** (RTU) and **Maintenance Services on the same license**.S

- Split the license based on functionality (i.e., RTU and maintenance) into separate FRNs for BMIC and IC

  - Contact the manufacturer or USAC's Customer Service Center (CSC) at 888-203-8100 to obtain the breakdown for specific functionality that is included in a specific mixed services license

  Tip 1: During your competitive bidding process, if you are seeking bids for Right-To-Use functionality and maintenance subscription services, **be sure to post for all applicable service types on the FCC Form 470. (i.e., IC and BMIC**)

Cat 2 Mixed Functionality - Example

Some licenses or service subscriptions may have **mixed** BMIC & Internal Connections (IC) functionality

- Question to ask: Is the "Prepaid Multiyear" license or subscription:
  - A Right-to-Use license and therefore an internal connections item and/or
  - Software upgrades and patches including bug fixes and security patches and therefore the SKU is basic maintenance of internal connections?

Tip: If it contains features of **both** types, you should work with the vendor to determine if a separate identifiable price exists for the different aspects.

E-Rate Simplification – New Last Year, But Bears Repeating!

- **10% Internet Access Hold Harmless**
  - Up to 10% can be used for ineligible purposes
  - Important for schools with ineligible Pre-K students and CTCs that provide adult ed classes
  - Other usage during the school day
  - Applicants may seek E-Rate funding for only the amount of bandwidth needed for eligible use
- **Library Bidding Exemption**
  - Libraries (only) are exempt from bidding **Category 2** equipment or services if:
    - The total pre-discount amount is $3,600 or less
    - Total cost is per library and cannot be averaged over multiple libraries
    - Cost-effective rules still apply
    - Contracts still must be signed prior to filing the Form 471

E-Rate Simplification…Continued

Repeal of C2 NIF Cost Allocation Requirement for Shared Equipment:

- Applicants are not required to cost-allocate the non-instructional facility (NIF) usage of a shared piece of equipment in a NIF.
    - Such as a district switch or wireless controller located in an administrative building or data center.
    - Unfortunately, C2 equipment that is solely used by the NIF will continue to be ineligible (for example, WAPs in admin buildings)

Full Eligibility for Data Network Cabling:

- The FCC clarified that structured cabling in a school or library may be connected to ineligible equipment such as security cameras, voice equipment, smoke detectors, etc.
    - If the network primarily served an eligible purpose (i.e., distributing broadband throughout a school or library building), the full cost of the cabling is eligible.
    - However, networks that are dedicated to an ineligible purpose, such as security networks or voice networks, remain ineligible

Application Process Reminder

FY 2025 Application Timeline

E-Rate Step	Suggested Timeline
1) Assess Needs/Create Your Plan	August - December
2) Update EPC Profiles - Admin Window	Oct - early January
3) Bid All New Services/Equipment – Form 470	Now - December
4) Bid Evaluation	January/February
5) Board Approval/Sign Contracts	January/February
6) Request E-Rate Funding – Form 471	Mid Jan. – March 25? (deadline TBA)
7) Application Review – PIA	March - August
8) Funding Commitment – FCDL	April - August
9) Turn-On Funding/CIPA Compliance – Form 486	FCDL receipt – October 29
10) Receive Services	July 1, 2025 – June 30, 2026
11) Pay Vendor	July 1, 2025 – June 30, 2026
12) Submit Invoice to USAC (one of two options) – Form 472 BEAR if paid vendor bill in full **or** – Vendor submits Form 474 SPI to USAC if you received discounted bills	October 28, 2026 (deadline)

Receiving Service/Equipment

- Category 1 services must be delivered between July 1 – June 30
  - Installation may occur as early as January 1 or the contract signing date, whichever is later
  - Services may not BEGIN until July 1
- C2 equipment (falls under IC) has an 18-month window to purchase/install equipment
  - May be purchased/installed anytime after April 1 (3 months before funding year begins)
  - Equipment must be purchased and installed by September 30 (3 months after funding year is complete)

FY2025 - Non-Recurring Services/Equipment Purchases - April 1, 2025 - Sept 30, 2026																	
			FY2025 - Recurring Service - July 1, 2025 - June 30, 2026														
Apr	May	June	July	Aug	Sept	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	June	July	Aug	Sept
2025	2025	2025	2025	2025	2025	2025	2025	2025	2026	2026	2026	2026	2026	2026	2026	2026	2026

When Must a Form 470 be Posted?

1. **Month-to-Month Services**
   - No contract exists – these are mostly cable modem-type services, or hotspots for a library's bookmobile
   - File annually unless using CABIO

2. **New Contracts (new service or current contract will expire 6/30/2025)**
   - File before signing any new contract
   - If you posted a Form 470 in a previous year, and then signed a multi-year contract that expires on or after June 30, 2026, you are **<u>not</u>** required to file a Form 470 for FY 2025

3. **Bandwidth Upgrades**
   - If you're upgrading service mid-contract and the upgrades and associated prices are not included in the original contract

Contract Extensions:
- Permitted but must have been in original contract and must have definitive end date
  - For example, a 3-year contract, with two 1-year renewals. Will not require new 470 until the end of 5 years
- Must notify the vendor before filing Form 471 if you want to exercise one of your contract extensions
  - Can be as simple as an e-mail; some vendors want contract amendment
  - USAC will ask for this during your application review

When to File the Form 470

Deadline: Form 470 must be posted online <u>at least</u> 29 days before the close of the Form 471 window

For example:

- If Form 471 deadline is March 25, 2025; then…
- February 25, 2025 = 470 Deadline
  - <u>DO NOT wait this long!</u>
  - Gives you 1 day to evaluate bids, negotiate contracts, seek board approval, sign contracts, and then file the Form 471 by the 471 deadline

- **If you need to file a Form 470, plan on attending Form 470 training!!!!**

- You will also be able to find helpful Form 470 Guides at:
  https://www.ohio-k12.help/e-rate-support/resource-library/

  - Form 470 Disqualification Suggestions
  - C1 & C2 Form 470 Filing Guide – Schools/District
  - C1 & C2 Form 470 Filing Guide –Libraries
  - Sample C1 & C2 Bid Matrix/Acceptance Letter

Allowable Contract Date

Sample Calendar

Sunday	Monday	Tuesday	Wednesday	Thursday	Friday	Saturday
29	30	31	**1** Date of RFP Upload Day 1	2 Day 2	3 Day 3	4 Day 4
5 Day 5	6 Day 6	7 Day 7	8 Day 8	9 Day 9	10 Day 10	11 Day 11
12 Day 12	13 Day 13	14 Day 14	15 Day 15	16 Day 16	17 Day 17	18 Day 18
19 Day 19	20 Day 20	21 Day 21	22 Day 22	23 Day 23	24 Day 24	25 Day 25
26 Day 26	27 Day 27	28 Day 28	**29** Allowable Contract Date Day 29	30	1	2

- **This is the earliest you can select a vendor.**[1]
- **You can wait up until you certify FCC Form 471 to select a vendor.**[2]

Remember

If the 470 narrative or RFP does not include a bid submission deadline

then applicants are **required** to accept all bids up until they conduct their bid evaluation.

[1] This may vary based on state and local procurement rules.
[2] You must select a vendor before the filing window closes.

Cybersecurity Pilot Program

Pilot Program Overview

- On June 6, 2024, the FCC adopted a Report and Order (FCC 24-63) establishing a **three-year Pilot Program** to provide up to **$200 million in Universal Service Fund support** to participating eligible schools, libraries, and consortia of schools and libraries, to defray the costs of eligible cybersecurity services and equipment.

- The Pilot Program will evaluate the effectiveness of using USF funding to support cybersecurity services and equipment to protect school and library broadband networks and data and determine whether to fund them on a permanent basis.

- To facilitate the inclusion of a diverse set of Pilot projects and target Pilot funds to the populations most in need of cybersecurity support, the FCC will award support to a combination of large and small, urban and rural schools, libraries, and consortia, with an emphasis on funding proposed Pilot projects that include low-income and Tribal applicants.

Pilot Program Overview

- **Four categories of eligible equipment/services:**
  - Advanced/Next Generation Firewalls
  - Endpoint Protection
  - Identity Protection and Authentication
  - Monitoring, Detection, and Response

- **CPP Eligible Services List**: https://www.fcc.gov/cybersecurity-pilot/cybersecurity-pilot- eligible-services-list
- There will only be one application cycle (**not one each year**).
- **General process:**
  - Form 484 Part 1 – General questions – Due by November 1, 2024
    - Go to https://www.ohio-k12.help/e-rate-support/resource-library/ for a copy of USAC's user guide and a **Word doc with a "question" worksheet**
  - FCC selects Pilot participants and announces in public notice
  - If selected, *then*:
    - Form 470 bidding (min 28 days)
    - Vendor contract signing
    - Form 471 to request funding
      - Form 484 Part 2 – Detailed questions
      - Will be done concurrently with Form 471
    - USAC sends FCDL
    - Equipment/Services purchased
    - Reimbursement forms submitted (BEAR or SPI)

How Much Funding is Available?
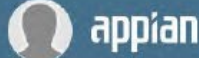
- Funding amounts are *pre-discount amounts*. Selected participants must pay their non-discounted share of the eligible services and equipment costs, using the E-Rate Category 1 discount matrix.

- The $200 million available is the total amount available over the 3 year period, not an annual amount.

- *Schools*: Each school is eligible to receive up to $13.60 per student, annually, on a pre-discount basis.
  - There is a pre-discount minimum annual floor of $15,000/year if the school or district has 1,100 or fewer students,
  - and a pre-discount maximum of $1.5 million/year.

- *Libraries*: Each library is eligible to receive a pre-discount budget of $15,000 annually up to 11 libraries/sites. For library systems with more than 11 libraries/sites, the budget will be up to $175,000 pre-discount annually.

- *Note*: Each amount mentioned is per year, so multiply the amounts times **3**.
  - Pilot participants may request reimbursement for expenses as they are incurred even if it means that the amount of funding disbursed in a given year of the program exceeds their annual budget (for example, you can purchase a 3-year MFA license and receive reimbursement for the full amount in year 1).

Pilot Program Application Process

Designating Cyber Pilot Users in EPC: Applicants can now designate which EPC users will have certain permissions for the Cybersecurity Pilot Program. To set user permission levels, follow the following steps (note – USAC denotes the Pilot at CBR in EPC):

1. Log into EPC

2. From the landing page, click **Manage Users**

3. Check the checkbox for your Billed Entity Number (BEN) and select **Manage User Permissions**

4. Select **CBR User Permissions**

5. Select the appropriate **CBR 484 Permission** level for each user

6. Click **Submit**

Cybersecurity Dashboard View

Where to Go for E-Rate Help

- **USAC's Client Service Center (CSC)**
  - E-Rate "Help Desk" where applicant & service providers can get answers to questions
  - Call **888-203-8100**
  - Submit a 'Customer Service Case' in EPC

- **E-Rate Coordinator**
  - E-mail Lorrie Germann at lorrie.germann@education.ohio.gov
  - Call: 740-253-1153
  - Attend webinars!
  - https://www.ohio-k12.help/e-rate-support   **(Note new URL!!)**
  - Subscribe/read listserve messages! **(If you've had issues receiving my emails, please subscribe again!!)**
  - Helpful Documents: https://www.ohio-k12.help/e-rate-support/resource-library/
  - Training: https://www.ohio-k12.help/e-rate-support/e-rate-events/