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Funding Status – FY 2021

Wave 19 for FY 2021 was released on Thursday, August 19th, for a total of $87.7 million including $2.04 million for 9 North Carolina applicants. Cumulative commitments are $1.98 billion including $76.7 million for North Carolina. Nationwide, USAC has now funded 91% of the FY 2021 applications representing 68% of the requested funding.

The 2021-2022 application window for the Emergency Connectivity Fund ("ECF") closed Friday, August 13th. If USAC matches the early processing rate for regular FY 2021 applications last spring, we would expect the first wave of ECF funding commitment decision letters ("FCDLs") by mid-September. The FCC's target is to have USAC issue FCDLs for 50% of the workable applications within 60 days and 70% within 100 days.

Out-Of-Window ECF Applications

With the formal ECF application window now closed, we are beginning to see a few Out-Of-Window ("OOW") applications being filed with the hope that the FCC will grant waivers to have these applications considered "In Window." With traditional E-rate applications, the FCC has historically granted such waivers, for applications filed within 14 days of the close of the regular application window (and more recently for COVID-related filing problems within 30 days of the close of the window).

Although there is no assurance that the FCC will apply the same waiver policy to late-filed ECF applications, the expectation appears reasonable assuming, as is likely, that total funding requested for in-window applications does not exceed the $7 billion program cap. To this end, USAC has already published ECF waiver guidelines. One key point to note, different from the traditional E-rate waiver process, is that ECF OOW waivers must be filed with the FCC within 30 days — not the traditional 60 days — of receipt of the OOW notification from USAC.

A more immediate point to note is how OOW applications are designated in USAC's ECF Portal. As first displayed, these applications are simply shown as "Certified," no differently from other applications that were filed within the window. Once you click on the ECF application number, however, the Summary information will appear as follows:

Note that the Window Status clearly indicates "Out-Of-Window," not "In-Window." The Certified Date also references a filing date after the 8/13/2021 window closing date. In this example, the Last Modified Date is the same as the Certified Date, but this date may change based upon further processing steps.

Applicants who have filed, or even begun, multiple ECF applications will see a list of those applications in their ECF Portals. The list can be filtered by "Certified" applications to see only those applications actually filed. Without reordering the list of certified applications (e.g., by alphabetizing it), applications will be listed in the order filed. As a result, OOW applications will appear last.

E-Rate Updates and Reminders

Upcoming E-Rate Dates:

September 2   Form 486 deadline for FY 2020 covering funding committed in Wave 53. More generally, the Form 486 deadline is 120 days from the FCDL date or the service start date (typically July 1st), whichever is later. Upcoming Form 486 deadlines are:

Wave 54	09/09/2021
Wave 55	09/16/2021
Wave 56	09/23/2021
Wave 57	09/30/2021

USAC ECF Newsletter Dated August 17 – Invoicing FAQs

USAC's Emergency Connectivity Fund Program Newsletter of August 17, 2021, focuses on invoicing, noting that applicant and service provider reimbursement request forms will be available in the ECF Portal after the first wave of funding commitments. The majority of the newsletter, however, reviews the following frequently asked invoice questions:

If the service provider is invoicing on behalf of the applicant, does it need a Service Provider Identification Number (SPIN) for ECF?

Short (and only) answer: Yes.

Do approved applicants that receive recurring monthly services need to submit invoices within 60 days of each monthly invoice?

Short answer: No.

Can applicants pre-pay for a year of services and seek reimbursement as soon as they have a funding commitment?

Short answer: No.

Can a school or library apply for reimbursement before paying the service provider?

Short answer: Yes.

Is there a minimum number of days that hotspots or connected devices must be in use – that is, loaned out to library patrons – to justify reimbursement for the services or equipment?

Short answer: No, but the goal is to avoid the warehousing of devices.

Does an applicant using SPI invoicing need to register with SAM.gov?

Short answer: No.

For equipment purchases, what is the deadline for filing requests for reimbursement?

Short answer: Generally, August 29, 2022.