

FCC's Emergency Connectivity Fund ("ECF")

June 2021

Presented by E-Rate Central

www.e-ratecentral.com

- ECF Overview
- Eligible Services, Entities, Users, and Locations
- Filing Windows(s) and Application Process
- Invoicing
- CIPA
- Certifications and Record Retention
- Other Provisions
- What Should You Be Doing Now?

ECF Overview

- \$7.1 billion in COVID-relief funding under the American Recovery Act
- A separate “E-rate” fund to support remote learning during the pandemic
 - Will be administered by USAC and use some E-rate systems
 - Treasury – not USF – funding
 - Pays for equipment and internet for unserved students and patrons
 - First application window this summer for 2021-2022 purchases
 - Second window could cover retroactive payments back to March 2020
 - Serious certification and record retention requirements
 - Many unanswered questions

Eligible Entities

All schools and libraries normally eligible for traditional E-rate are eligible for ECF funding

- Even if they've never applied for E-rate before
- Minor expansion of definition of Tribal libraries

Eligible Locations

Any off-campus locations where education is occurring

- Not just homes (e.g., community centers, homeless shelters, etc.)
- School buses and bookmobiles
- Does not include equipment/services solely for on-campus use

Eligible Users

Students, school staff, and library patrons without sufficient internet access and/or connected devices to engage in remote learning

- Requires certifications

Eligible Equipment

- Laptops and tablets — but not:
 - Desktop computers (deemed not mobile)
 - Smartphones
- WiFi hotspots (and cellular air-cards)
- Modems and routers (or equivalent)

Eligible Services

- Commercially available internet services
 - Including installation and other fees
- Limited exception for network construction and/or datacasting
 - Only when you can certify and document that there is no commercially available service

“Reasonable” Price Caps

- Laptops and tablets — \$400
 - Waivers available (e.g., for people with disabilities)
- WiFi hotspots — \$250
- Modems and routers — USAC to review
- Broadband internet (in bulk) — “expect” \$10-25/mo.

Other Limitations

- Must be used primarily for “educational purposes”
- Single individual user devices
- Ineligible equipment/services
 - Backup equipment
 - Cybersecurity tools
 - Technical support
 - Subscription services

Initial Filing Window

- 45-day window to open ASAP
 - With modified Form 471
- Funding for prospective purchases 2021-2022
- No FCC competitive bidding requirements
 - No Form 470
 - Must still comply with state and local requirements

Other Windows — IF Funding Available

- Possible 2nd window for prospective purchases
- Possible window for retroactive purchases
 - March 1, 2020 to June 30, 2021


Prioritization for Limited Funds

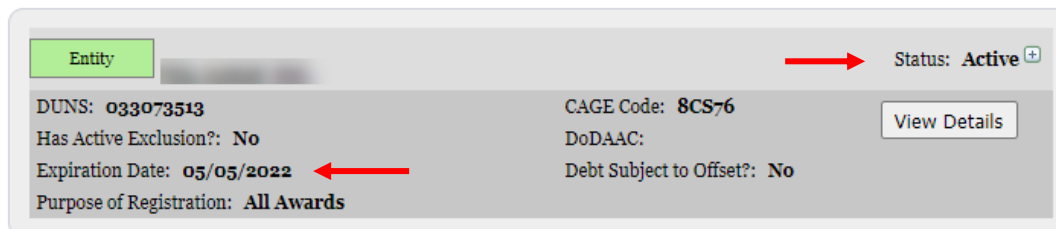
- If funding is not sufficient to fund all valid applications within any window, funding with prioritized
 - First by discount rate band
 - The by NSLP percentage within a band
- Modified discount matrix for ECF
 - Additional 5% for rural applicants

	Emergency Connectivity Fund Prioritization Matrix	
	Discount Level	
% of students eligible for National School Lunch Program	Urban	Rural
< 1.....	20	30
1-19.....	40	55
20-34.....	50	65
35-49.....	60	75
50-74.....	80	85
75-100.....	90	95

- Revised discount matrix used only for prioritization
- Reimbursements remain at 100%

“Streamlined” Invoicing Process

- USAC must begin accepting invoices within 15 days of first wave
- BEAR or SPI
 - SPIs permitted if applicants and suppliers both consent
 - BEAR “prepayments” are permitted if applicants can document vendor payments within 30 days
- Invoice deadlines are within 60 days of the later of:
 - FCDL, RFCDL, or appeal decision date
 - “Service delivery date”
- System for Award Management (“SAM”) registration is required
 - See search function by name or DUNS number at 



The screenshot shows a registration card for an entity. The card has a green 'Entity' tab on the left. The status is 'Active' with a dropdown arrow. The DUNS number is 033073513. The CAGE Code is 8CS76. The expiration date is 05/05/2022. The purpose of registration is 'All Awards'. There are red arrows pointing to the status and expiration date fields. A 'View Details' button is on the right.

Entity	Status: Active
DUNS: 033073513	CAGE Code: 8CS76
Has Active Exclusion?: No	DoDAAC:
Expiration Date: 05/05/2022	Debt Subject to Offset?: No
Purpose of Registration: All Awards	View Details

CIPA Applies for Off-Campus Use

- For **ANY** computer owned by a school or library
- **IF** the school or library is receiving ECF or E-rate funding for internet or internal connection
- Does **NOT** apply to third-party owned devices
- CIPA certification is not required for applicants that have already certified compliance in a given funding year
 - Implies only one Form 486 required for FY 2021

Greater Reliance on Applicant Certifications

- Funding is to meet “otherwise unmet connectivity needs”
- Compliance with state and local procurement requirements
- No “duplicate” funding through other federal pandemic programs
- Primary use is for “education purposes”
- Additional certifications re:
 - Eligibility of equipment and services
 - 10-year record retention
 - Agreement to participate in post-commitment reviews and audits

Traditional Record Retention — PLUS

- Service inventory requirements
 - Type of service (fixed or wireless)
 - Service plan details (e.g., speed and data cap)
 - Name of person to whom service was provided
- Support for new certifications
- Specific timing considerations
 - June 30, 2023 — Applicant funding horizon
 - Sept. 30, 2030 — Administrative funding horizon, including audits

Other Factors To Consider

- Gift rule waiver expires June 30, 2021
 - Exception for equipment and services directly related to remote learning through June 30, 2022
- Appeal/waiver window is 30 days
- Presumed life-cycle for equipment purchases is 3 years
- Form 471 will include survey of student remote learning needs
- Consortium applications require careful consideration
- Many details remain to be addressed

Preliminary Next Steps

- Read the FCC Report and Order (FCC 21-58)
- Survey unserved students
- Review and update EPC entity profile
 - Apply for and/or update SAM registration
- Explore supplier arrangements
- Stay tuned for additional details
 - Subscriber to USAC News Briefs and E-Rate Central newsletters

Additional Information



- Report and Order (FCC 21-58)

<https://docs.fcc.gov/public/attachments/FCC-21-58A1.pdf>



- USAC E-rate

<https://www.usac.org/e-rate/>



- E-Rate Central

<https://e-ratecentral.com>