USAC

Schools and Libraries NEWS BRIEF

April 4, 2014

TIP OF THE WEEK: If you have not filed your Item 21 attachments or certified your timely filed FCC Form 471, do so as soon as possible. Click the Item 21 Attachment button in the FCC Form 471 column on the Apply Online page to submit your Item 21 attachment online; click the Certify Complete button in the same column to certify your form online or on paper.

Commitments for Funding Year 2013 and 2012

Funding Year 2013. USAC will release Funding Year (FY) 2013 Wave 46 Funding Commitment Decision Letters (FCDLs) April 9. This wave includes commitments for approved Priority 1 (Telecommunications Services and Internet Access) requests at all discount levels. As of April 4, FY2013 commitments total over $2.03 billion.

Funding Year 2012. USAC will release FY2012 Wave 82 FCDLs April 10. This wave includes commitments for approved Priority 2 requests at 90 percent and denials at 89 percent and below. As of April 4, FY2012 commitments total over $2.86 billion.

On the day the FCDLs are mailed, you can check to see if you have a commitment by using USAC's Automated Search of Commitments tool.

Overview of the PIA Review Process

Program Integrity Assurance (PIA) is the process used by USAC to review applications for compliance with program rules and policies. During this process, USAC reviews the information on your FCC Form 471 and may contact you with additional questions on specific items.

The review process has two components:

- Initial Review
- Final Review, a quality assurance review process of the Initial Review work.

Initial Review

After your FCC Form 471 has been assigned to an initial reviewer, the initial reviewer prepares the questions that USAC must ask based on the information you provided (or did not provide) on your application. The questions can cover a wide range of issues on your application, including but not limited to:

- the eligibility of the schools and libraries listed on your application
- the eligibility of the products and services listed on your Item 21 attachment
- the discount rate on your Block 4 worksheet(s)
- your competitive bidding process, including your adherence to the 28-day posting requirement
- discrepancies between the funding request and the Item 21 attachment and/or supporting documentation.

The information on the FCC Form 471 may be sufficient to complete the review without applicant contact. If not, USAC must request more information.

Once the appropriate questions have been prepared, the initial reviewer contacts you using your preferred mode of contact.

- If your preferred mode of contact is email or fax, the initial reviewer's first contact is the email message or fax containing the list of questions that require a response.
- If your preferred mode is telephone, the initial reviewer will call you and then email or fax you the list of questions.
- In all cases, USAC provides written questions and asks for written responses to those questions.

In general, you have 15 days from the date of the email or fax to provide responses to USAC's questions. (For more information on the specific summer and winter periods when this procedure is modified, refer to the Missing Information guidance on the USAC website.)

- If USAC has not received a response – or receives only a partial response – after seven days, USAC sends you a reminder and forwards a copy of the reminder to your state school or library E-rate coordinator.
- If USAC does not receive a response after 15 days, USAC will continue to process your application with the information on hand, which may lead to a modification or denial of funding.

During all review processes, you always have the following options:

- **You can ask for clarification.** If you don't understand one or more questions, ask your initial reviewer what the question means or what information USAC expects in your response.
- **You can ask for more time to respond.** USAC can grant a limited extension of time to respond to questions. However, if you ask for more time, your initial reviewer will set aside your application and start other reviews while you work on your response, so he or she may not be able to return to your application quickly once you provide the information.
- **You can ask to speak with a manager.** If you feel that you are not communicating successfully with your initial reviewer, please ask to speak to a manager. You will not be penalized if you make this request, and the manager can help you understand the questions USAC is asking and the responses USAC expects to receive.

Initial Review modifications and denials

Once Initial Review has been completed, the initial reviewer may recommend that a funding request be modified or denied based on the information supplied during the review. Some examples of modifications are:

- Removal of ineligible products and services
- Removal of ineligible recipients of service
- Addition of eligible recipients of service
- Reduction in number of months of service
- Reduction in amount of funding based on additional documentation you provided
- Changing contract start or end dates
- Changing from month-to-month services to contracted services
- Changing the establishing FCC Form 470 application number.

If the initial reviewer concludes that a funding request should be modified or denied, you will be contacted before USAC issues your FCDL. The initial reviewer will inform you of the result of the review and give you an opportunity to provide additional information if you disagree with the conclusion. (If you agree with the initial reviewer's determination, you do not have to provide a response.) USAC will review any additional information provided.

Final Review

Final Review is a review by USAC of the work done during Initial Review. Each step of the Initial Review process is itself reviewed by a final reviewer to verify that the correct procedures were followed, the appropriate questions were asked, and complete answers were received. If the final reviewer has a concern about any part of the Initial Review process, the application is returned to the initial reviewer for follow-up work.

The result of this process is that you may be contacted after your Initial Review with what may appear to be additional or repetitive questions. If the questions you are being asked seem new or repetitive, it is likely that USAC needs additional information that was not gathered during Initial Review. Make sure you understand what information is being requested and provide the information as quickly and

accurately as possible.

Some applications go through a third level of review called **Quality Assurance (QA)**. Quality Assurance is an additional check to verify that all parts of the review were done correctly. As with Final Review, applications may be returned to the initial reviewer for follow-up.

It is important to understand that the review process is not linear. At any point during the process, an application can be returned to an earlier stage because of work that was not completed correctly or information that is missing. If you are following the progress of your application using the View 471 Status tool, do not be alarmed if your application seems to move "backward" – that is, to an earlier status. If you do see such a movement, monitor your preferred mode of contact carefully in case an initial reviewer attempts to contact you.

In summary, to be prepared for PIA review, be sure to do the following:

- Check your FCC Form 471 and your Receipt Acknowledgment Letter (RAL) to make sure all of your entries are correct. If you find a mistake, submit a RAL correction by following the instructions in the RAL. If your review has already started, you can submit your corrections directly to your reviewer using the reviewer's contact information provided on the PIA fax/email.
- Organize all of the documentation related to your application and have it readily available to assist you in answering any questions.
- Monitor your preferred mode of contact so that you will know when PIA attempts to contact you.
- Answer all questions promptly and completely.
- Ask for more time to respond if you need it.
- If you are having problems, ask to speak to a manager.

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