

Program Integrity Assurance (PIA) Review

Responding to PIA



Regular PIA Review

All Form 471 applications are reviewed for:

- Entity Eligibility
- Discount Accuracy
- Eligible Products & Services
- Compliance with Program Rules

Form 471 Receipt Acknowledgment Letter (RAL)

- Issued by USAC to applicants and service providers after Form 471 is certified
- Confirms the filing of the Form 471 and provides the details of the funding requests
- Offers an opportunity to make allowable corrections

PIA Questions

What do you do when PIA contacts you? (*make your selection*)

A. Resign immediately and don't leave forwarding information.

A. Hide under your desk.

B. Respond to the questions.



What is the purpose of PIA Review?

- To educate applicants about E-Rate jargon (e.g., FCDL, Tariff, SPAC, etc.)
- To ensure that Universal Service Fund support is committed only for eligible products and services as well as eligible uses by eligible entities.
- To annoy applicants by asking for the same documents multiple times.

Your Selection...

- **Answer is C.**
Respond to all PIA requests for information – be sure you are aware of deadlines for responding

Be Responsive

- ✦ Pay attention to **PIA** information requests.
- ✦ If you are unsure what the PIA Reviewer is asking, use the contact information provided to ask the PIA Reviewer to clarify the question.
- ✦ Ask to speak with a Manager if you are still unsure what the reviewer is requesting.
- ✦ Be clear and detailed on original application information to avoid increased PIA questioning.
- ✦ Document communication with PIA, e-mail is preferred (acknowledgement of receipt).

Types of PIA Reviews

Heightened Scrutiny PIA Reviews

- Generally includes all applications associated with the BEN.
- This is a targeted review of one or more of the following areas:
 - competitive bidding and evaluation process,
 - budget,
 - technology plan,
 - necessary resources (e.g., professional development, software, hardware, maintenance); and
 - products/services pricing and use

Be Responsive (cont.)

- ✦ Don't assume that Reviewer has your original Item 21 attachment.
- ✦ Respond quickly if possible.
- ✦ Establish a working relationship.
- ✦ Reach out to service provider if question is in regards to components of service.

Levels of PIA Review

Initial Review, Final Review, QA 1, QA 2

- ◆ Applications always start in Initial Review
- ◆ Initial Reviewer from regular and/or heightened scrutiny team contacts the applicant with questions
- ◆ If a more senior reviewer finds an issue with the review of the application, it will be returned to the initial reviewer and then have to move back up again.

Time to Respond to PIA

- FCC provides 15 days to respond to requests for information from USAC
- PIA will send applicant a reminder on or near the 7th day
- Applicants can always ask for an extension, but must be in writing.
 - *May delay your application*

Application Status

Schools and Libraries Service Program Services Ordered and Certification Form 471 Application Status

To determine the status of your Form(s) 471 in a particular Funding Year, enter your **Eligible Entity Number** in the box below, choose the appropriate **Funding Year**, and click **Search**. The results returned by the search will indicate your Form 471 Application Number, your Applicant Form Identifier, and the most recent Application Status of each Form 471 for which Block 1 of the form has been successfully data entered.

A table listing each Application Status message and an Explanation of the message will display with the table of your search results.

Form 471 Eligible Entity Number:	Funding Year:
<input type="text" value="14530"/>	<input type="text" value="Year 2008 01/21/2008 - 05/30/2009"/>

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Schools and Libraries Service Program
Services Ordered and Certification Form 471
Application Status Display

Billed Entity Number: 145909 Funding Year: 2008

Form 471 Application Status Display

The search results for the Billed Entity Number and Funding Year that you specified appear on the next page. Each line contains the following information:


- The Form 471 Application Number assigned by the USAC system
- The Applicant Form Identifier that you created for the form
- The status of the form.

The table on the search results contains a list of statuses and an explanation of each status.

The timeframe for each step in the application process varies greatly and, as you can see below, the progress of an application is not necessarily linear — an application can return to an earlier status at certain points in the review process. A number of factors affect the speed at which an application moves through the review process. The most significant of these factors include:

- The total dollar amount requested
- The number of Funding Request Numbers (FRNs)
- The number of recipients of service
- The complexity of services requested
- The completeness of the description of service.

Previous Continue



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PIA Contact Reasons


PIA may request:

- Student count (population)

WHY??? Capacity of the equipment relative to the student population

- Contract or Scope of Service


WHY??? Need a detail list of services received (e.g., equipment, travel cost, maintenance charges, technician charges, etc.)



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Initial Review & Final Review

Application Status	Explanation
Canceled	Your Form 471 has been canceled. No further action will be taken on this form.
Incomplete	Block(s) of your Form 471 has been successfully data entered. However, no further action will be taken on this form until it is completed and certified (whether online or on paper) and moves to Certified - In Window status.
Complete	(THIS STATUS IS FOR ONLINE FILERS ONLY) You have clicked the "Submit" button to file your Form 471, but the Block(s) certification process (whether online or on paper) has not been completed.
Certified - In Window	Your Form 471 was successfully certified within the filing window for the Funding Year and is awaiting assignment for Initial Review.
Certified - Out of Window	Your Form 471 was certified outside of the filing window for the Funding Year.
Initial Review	Your Form 471 has been assigned for Initial Review and is being reviewed by Program Integrity Assurance (PIA) for compliance with program rules. All applications must receive both an Initial Review and a Final Review. NOTE: Your Form 471 may return to Initial Review status at any time before a Funding Commitment Decision Letter is issued.
Available for Final Review	Your Form 471 review has completed Initial Review and is awaiting assignment for Final Review. All applications must complete both an Initial Review and a Final Review.
Final Review	Your Form 471 has been assigned for Final Review. All applications must receive both an Initial Review and a Final Review. NOTE: Your Form 471 may return to Final Review status at any time before a Funding Commitment Decision Letter is issued.
Available for Quality Assurance	Your Form 471 has completed Final Review. Your Form 471 may be assigned for Quality Assurance Review. Quality Assurance Review verifies that the Initial Review and Final Review procedures were properly performed.



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PIA Contact Reasons


PIA may request:

- Location

WHY??? The equipment location relative to the entities served (e.g., proximity, environmental considerations)

- Rationale or justification for equipment selection


WHY??? Circumstances may exist, like building configurations or school district's purchasing standards, that impact the cost of delivering eligible services.



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QA 1, QA 2

Available for Quality Assurance	Your Form 471 has completed Final Review. Your Form 471 may be assigned for Quality Assurance Review. Quality Assurance Review verifies that the Initial Review and Final Review procedures were properly performed.
Quality Assurance 1	Your Form 471 has been assigned for a first-level Quality Assurance Review. Quality Assurance Review verifies that the Initial Review and Final Review procedures were properly performed.
Quality Assurance 2	Your Form 471 has been assigned for a second-level Quality Assurance Review. Quality Assurance Review verifies that the Initial Review and Final Review procedures were properly performed.
Unable to Contact	Your Form 471 is on hold because PIA was unable to reach the Form 471 contact person. If you wish to have PIA recontact you regarding your pending application, contact your PIA reviewer. If you don't know who your reviewer is, contact our Client Service Bureau at 1-888-203-8100.
Hold for further review and other verification	Your Form 471 is on hold because we need to verify additional information. Once we have obtained the information for verification, we will continue to process your Form 471.
Awaiting Applicant Documentation	We have requested information or documentation and you have not responded to our latest inquiry. Please review our questions and provide the necessary information. Once we have obtained the necessary information, we will continue to process your Form 471.
Deferred	Your Form 471 is on hold. You were unavailable or you requested that PIA defer the Form 471 review during either our Summer or Winter deferral period. If you wish PIA to remove the hold and continue review, contact your PIA reviewer. If you don't know who your reviewer is, contact our Client Service Bureau at 1-888-203-8100.
FCDL issued - 'x/x/xxxx'	We have issued a Funding Commitment Decision Letter (FCDL) on the date indicated that references one or more Funding Requests from this Form 471. If more than one FCDL has been issued, the date indicated is the date of the most recent FCDL.




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PIA Contact Reasons

PIA may request:

- Competitive bidding documents

WHY??? Ensure the competitive bidding process was based on selecting the most cost effective offering with price of the most eligible goods and services being the primary factor



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Applicant's Response

Consider including in your response:

Student count

- Anticipated school growth for the current and next funding year (e.g., school expansion project, school district rezoning)
 - ◆ Board minutes, superintendent letter, new construction RFP are documents you can provide to explain the school growth



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Applicant's Response

Consider including in your response:

▶ Technology needs are met

- Describe how the entities are meeting the technology needs and educational goals described in your technology plan.

▶ Competitive bidding

- Provide the bid evaluation matrix, RFP, correspondence between the potential vendors and the applicant, and other information documenting the bid process.

▶ Other considerations

- This is the applicant's opportunity to discuss circumstances that uniquely affect the goods or services pricing



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Applicant's Response

Consider including in your response:

■ Contracts

- ◆ If the contract only has the applicant's signature, date and terms, include a detailed scope of service.

■ Location

- ◆ Include all eligible locations where the equipment will be located. Don't forget to cite NIFs on the school's campus in your response.



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Applicant's Response

Hints:

- ☑ You should not renegotiate the pricing with your vendor during PIA review. This is a competitive bidding violation.
- ☑ Do your homework. Research what is offered in the marketplace and pricing. Research what is the equipment capacity necessary for your entity.
- ☑ Foster a "competitive" environment. Learn who provides the goods and services you need. Make vendors aware you are seeking services.



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Applicant's Response

Consider including in your response:

■ Location cont'd

- ◆ Extreme geographic locations or weather conditions are a challenge for service providers to access. Include the conditions and/or circumstances that would affect the cost of service.
- ◆ Building conditions or the age of the building may require additional labor to install equipment or drops, like drilling through concrete walls.



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PIA Contact Reasons - Services

Category of service doesn't match

❖ The category of service selected on the FRN is not supported by description of service on the Item 21 attachment

Translation:

❖ Make sure your information is consistent
❖ Post for the proper service category, reference the Eligible Services List to determine the correct category

❖ PIA will change category of service



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PIA Contact Reasons - Services

"Other" or "Miscellaneous" charges

- ✱ Paper Item 21 contains or applicant provides PIA a summary phone bill or quote that includes the following terms, "other, miscellaneous, fees, other charges and credits, and surcharges."

Translation:

- ✱ Describe what these charges are with paperwork, when asked or include description in your Item 21 attachments



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PIA Contact Reasons - Services

Missing details for Basic Maintenance FRN

- BMIC request whose Item 21 states "Maintenance is being requested on eligible products and services."

Translation:

- PIA needs details on equipment
- Be sure to identify the make, model and quantity for all equipment being maintained



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PIA Contact Reasons - Services

Item 21 dollar amount does not match amount requested on Block 5 FRN

- Item 21 attachment does not support the amount being requested on FRN

Translation:

- Use the documents that led you to the requested amounts when filling out the Form 471 Block 5. If there's a discrepancy, explain why
- Online Item 21 brings Block 5 with FRN – check to insure numbers match



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PIA Contact Reasons - Services

Missing line count – telecom FRN

- The type of phone service is listed but there is no line count

Translation:

- Always provide the number of lines when submitting the Item 21 attachment
- If you do not know this answer ask your service provider



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PIA Contact Reasons - Services

Mixed bucket (service categories)

- Mixed bucket requests are requests that include services from more than one category of service

Translation:

- If requesting a service such as cellular service with Internet service be sure to post for both services on your Form 470 (e.g., voice/Blackberry services)
- Describe components on Item 21



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PIA Contact Reasons - Services

Missing bandwidth information (telecom or Internet access FRN)

- Digital Transmission Services request doesn't include bandwidth

Translation:

- Always indicate the speed of the services being provided (such as T-1, 3mbps or 100mbps, etc.) on Item 21 attachment



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Examples of PIA Questions

? PIA Question: USAC has not yet received the Item 21 Attachments for your FY2008 Form 471 application # XXXXXX.

✓ Applicant Answer:

- Submit Online (using the online system available at www.sl.usac.org/menu.asp) -OR-
- Faxing



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Examples of PIA Questions

? PIA Question: Our records do not include a signed Certification page for this Form 470.

✓ Applicant Answer: If Yes, you **have NOT** submitted the Form 470 certification (Option 2)

A) If Yes, you **are** the authorized person on the Form 470, then complete and sign a Form 470 Certification page for this Form 470 and mail it to the reviewer requesting the information.

B) If Yes, and you **are not** the authorized person on the Form 470, provide the Form 470 Certification page from the Form 470 signed by the authorized person.



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Examples of PIA Questions

? PIA Question: "For the Billed Entity XXXXXX, we do not have the associated FCC Registration Number ("FCC RN")."

✓ Applicant Answer:

- Applicant must go to FCC website (www.fcc.gov) and register online for an FCC RN
- FCC RN required for Billed Entity applicant only – not for individual schools



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Examples of PIA Questions

Contract Certification

? PIA Question: "Please provide supporting documentation to demonstrate that a signed contract was in place at the time of the submission of the FCC Form 471 certification. Also, please certify that your contract meets your state or local procurement regulations or rules."

✓ Translation: The contract did not have an applicant signature and/or a date. Because the signature and/or date is missing, PIA needs to confirm that the contract meets state/local procurement rules. PIA will ask you to complete the contract certification.



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Examples of PIA Questions

? PIA Question: Our records do not include a signed Certification page for this Form 470.

✓ Applicant Answer: If Yes, **you have** submitted (Option 1)

A) If the cited Form 470 certification was **postmarked on or before the close of the filing window on February 07, 2008**,

- Provide proof of mailing, such as a certified mail receipt, delivery tracking documentation, online certification confirmation page, or other equivalent documentation supporting your claim, and a copy of the original Form 470 certification page.

B) If your Form 470 Certification was submitted with other documents or Forms in the same envelope, please indicate what documents or Forms were submitted together. Please indicate the Form type (Form 471, Form 486, etc.) and application number if known.



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Examples of PIA Questions

Contract Certification Example

I certify that I am authorized to make the representations set forth below on behalf of **<enter entity name>**, the entity represented on this letter, and am the most knowledgeable person with regard to the information set forth herein. I certify that for Funding Request Number(s) (FRNs) _____, the Contract Award Date (CAD) is **<mm/dd/yyyy>** as reflected on the supporting documentation for this contract. I am correcting the CAD provided on the FCC Form 471 submitted for the above listed FRNs. I acknowledge that false statements can be punished by fine or forfeiture under the Communications Act, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001 and civil violations of the False Claims Act. I acknowledge that FCC rules provide that persons who have been convicted of criminal violations or held civilly liable for certain acts arising from their participation in the schools and libraries support mechanism are subject to suspension and debarment from the program. I declare under penalty of perjury that the foregoing is true and correct. Executed on ____ day of _____, 2007 at _____ [city], _____ [state].



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Examples of PIA Questions

? **PIA Question:** Our records do not include a signed Certification page for this Form 470.

- ✓ **Applicant Answer: If No**
- Provide the 15-digit Form 470 Number that did establish the bidding for the various FRN.



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Examples of PIA Questions

? **PIA Question:** "Based on your documentation FRN(S) xxx, xxx and xxx is a request for local, long distance or cellular service. The documentation does not indicate the number of lines for which funding is being requested. Please indicate the number of lines for which you are requesting service for this request."

- ✓ **Applicant Answer:**
- Applicant must submit number of lines for telecom request
 - No extra information required



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Examples of PIA Questions

? **PIA Question:** Detail portion of bill requested.... documentation provided in the Item 21 Attachments is not sufficient to determine the eligibility of your request.

(For example: Taxes, Fees and Surcharges)

- ✓ **Applicant Answer:**
Provide more detailed documentation. Such as the portion of the bill that identifies the actual products and services relating to the charges identified.



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Examples of PIA Questions

? **PIA Question:** If the FRN is a request for Priority 2 services, are the Internal Connections and/or Basic Maintenance in the non-instructional facility essential for the effective transport of data and information to an instructional building of a school or to a non-administrative building of a library? ___Yes ___ No

- ✓ **Applicant Answer:** *must answer "Yes" or NIF is ineligible for Priority 2 goods and services*

For further information about funding requests to non-instructional facilities, consult the "Educational Purposes" document at <http://www.usac.org/sl/applicants/step06/educational-purposes.aspx>



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Examples of PIA Questions

? **PIA Question:** "For FRN xxxxxxx, you requested \$2065.5/month on your Form 471. However, the documentation you submitted supports \$2470.95/month. Is the amount requested on the FRN correct? ___ Yes ___ No If No, please advise me of the eligible amount you wish to request. You may increase up to the amount cited above as supported in your documentation."

- ✓ **Applicant Answer:** Applicant may say "No" and increase funding request to amount documented.



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Examples of PIA Questions

? **PIA Question:** Unable to determine the eligibility of non-instructional facility

- **Service circumstances:** Is the non-instructional facility used solely for school, school district or library business? _Yes_ No
- Do only school, school district or library employees use the non-instructional facility? ___Yes ___ No
- **Applicant Answer:** YES/YES



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Funding Commitments

- ❖ USAC issues [Funding Commitment Decision Letter \(FCDL\)](#) to applicants and service providers when PIA review is complete
- ❖ Funding status by Funding Request Number (FRN):
 - Funded (includes modifications)
 - Not funded
 - As yet unfunded (applicant FCDL only)
 - Canceled
- ❖ Funds approved for specific services from specific service providers at the applicant's approved discount rate



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Support from ADE

- ◆ Filing Form 471 Online Lab
December 1-5, 2008
ADE Ranch (Little Rock)
- WILMA TOOMBS
Arkansas Department of Education
E-Rate State Coordinator
- Email:
wilma.toombs@arkansas.gov



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Funding Commitment Decision Letter (FCDL)

Available for Quality Assurance	Your Form 471 has completed Final Review. Your Form 471 may be assigned for Quality Assurance Review. Quality Assurance Review verifies that the Initial Review and Final Review procedures were properly performed.
Quality Assurance 1	Your Form 471 has been assigned for a first-level Quality Assurance Review. Quality Assurance Review verifies that the Initial Review and Final Review procedures were properly performed.
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Held for further review and other verification	Your Form 471 is on hold because we need to verify additional information. Once we have obtained the information for verification, we will continue to process your Form 471.
Awaiting Applicant Documentation	We have requested information or documentation and you have not responded to our latest inquiry. Please review our questions and provide the necessary information. Once we have obtained the necessary information, we will continue to process your Form 471.
Deferred	Your Form 471 is on hold. You were unavailable or you requested that PIA defer the Form 471 review during either our Summer or Winter deferral period. If you wish PIA to remove the hold and continue review, contact your PIA reviewer. If you don't know who your reviewer is, contact our Client Service Bureau at 1-888-203-8100.
FCDL issued - 'x'xxxxxxxx'	We have issued a Funding Commitment Decision Letter (FCDL) on the date indicated that references one or more Funding Requests from this Form 471. If more than one FCDL has been issued, the date indicated is the date of the most recent FCDL.



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E-Rate Support from SLD

- » Information on the E-Rate program can be found at the SLD web-site:
<http://www.universalservice.org/sl>
- » The E-Rate Customer Service Bureau (CSB) "help line" telephone number is:
888.203.8100
- » For e-mail help send questions to CSB at:
question@universalservice.org



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