



Advanced Program Integrity Assurance (PIA)

Helping You Succeed

Schools and Libraries Division

Washington, DC • Newark • Atlanta • Chicago • Orlando • Los Angeles • Portland • Houston
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Notes



Overview

- PIA Review Updates
- Entity Eligible and Discounts
- Schools Closings
- PIA Contact
- CIPA
- Form 471 Certifications
- PIA Review Tips

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PIA Review Updates

- FCC and Program Rule changes
 - None. FCC and Program rules have **NOT** changed
- PIA procedures are updated:
 - to address new conditions or circumstances affecting applicants,
 - to improve customer service, and
 - to ensure compliance with FCC rules

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PIA Review Updates

- More eligible entities (e.g., Dual Use Libraries, Head Start, Special Education programs for pre-school & Adult Education)
 - Complete the bi-annual survey concerning non-traditional entities
 - Inform USAC when your state's regulations have changed
 - A statute or regulation providing an alternative definition of school specifically for the purposes of receiving E-rate discounts will not be accepted

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PIA Review Updates

- Single entity with multiple facilities
 - Entity Number
 - Obtain an entity number for each facility if the facility has a different address or a public right-of-way crosses the campus
 - Discount
 - Discount is based on the total enrollment for the entity and NSLP data
 - Each location receives the same discount
 - List each facility on the Item 21 Attachment

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PIA Review Updates

- When your school or library closes or merges, PIA will request:
 - Revised student enrollment count & discount percentage
 - Closing/merger effective dates
 - Provide a cost allocation to remove services and funding from shared FRNs or cancel the FRN
 - A statement from a school official (e.g., Superintendent, Board of Directors)
 - Equipment transfer notification for equipment purchased within the last three years

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PIA Review Updates

- Provide a detailed explanation & supporting documentation when:
 - Cost allocation is not required
 - Student enrollment will not change
 - Repurposing the facility (e.g., administrative building, NIF)
- Contact CSB to change entity name and/or address or to request new entity number
 - You may need a new entity number when the facility has a different address, serves multiple entities (e.g., IT building serving multiple schools), or a public right-of-way crosses the campus

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PIA Review Updates

- Applicant & Service Provider Contact
 - Service review request for information from Service Providers
 - Applicants are copied on service provider's 2nd request for information
 - Applicants are informed when service provider fails to respond and the FRN(s) may be modified or denied as a result
 - Large dollar application non-response
 - Superintendent or Chief Librarian is contacted when no one responds to PIA inquiry

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PIA Review Updates

- Protecting Children in the 21st Century Act
 - Enacted in Fall 2008 to address Internet Safety in schools, specifically cyberbullying awareness and response
 - Before USAC can enforce new requirements the following must occur:
 - FCC will issue a Notice of Proposed Rulemaking (NPRM) seeking comment on the Act
 - FCC will draft new rules and the new rules must be voted by the FCC Commissioners
 - FCC will release guidance to USAC in an Order

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PIA Review Updates

CIPA (Children's Internet Protection Act)

- FCC Rules have not changed
- Non-telecom FRN(s) must be CIPA compliant at the start of service or when the Form 486 is filed, whichever is earlier.
- Applicants must retain documentation demonstrating their CIPA compliance

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PIA Review Updates

- PIA review occurs to ensure CIPA compliance for that funding year by the time services begin or the filing of Form 486
- During PIA review applicants are informed about any deficiencies (*non-compliance issues*)
 - Advisory email is sent after the review
 - FCDL comment provides an explanation
- Applicants may cure the deficiency prior to the start of service or the filing of the Form 486, whichever is earlier

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PIA Review Updates

▪ CIPA Requirements

- Public Notice & Public Hearing
- Technology Protection Measure (Filter)
- Internet Safety Policy (required elements)
 - Access by minors to inappropriate matter on the Internet
 - Safety & security of minors when using electronic mail, chat rooms, and other forms of direct electronic communications
 - Unauthorized access including "hacking" & other unlawful activities by minors online
 - Unauthorized disclosure, use, & dissemination of personal information regarding minors
 - Measures designed to restrict minors' access to materials harmful to minors

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PIA Review Updates

■ Form 471 Item 25 Certifications

- Read the certification statements before certifying
- Service providers should **NOT** pay for the applicant's non-discount share and/or assist applicants with securing the applicant's non-discount share
- Applicants should identify the costs associated with their necessary resources (e.g., hardware, professional development, software, retrofitting and maintenance)
 - Enter the amount in Item 25d
 - *If applicants file multiple forms, they may enter their aggregate amount requested on one form*

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PIA Review Tips

■ Form 471 Contact Information

- Will the primary contact person be available to respond to PIA inquiries?
- Did you provide a complete mailing address?
- Is the telephone or fax number still valid?
- Does the primary or alternate contact person have access to the email or fax listed in your preferred mode of contact ?

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PIA Review Tips

■ Form 471 Contact Information

- Inform the Client Service Bureau (CSB) about changes to Form 471 contact information
- Send a request via your organization's e-mail account or on your organization's letterhead to CSB detailing your request
 - Make sure you indicate if your request is form-specific or if USAC should update its database

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PIA Review Tips

■ Preferred Mode of Contact

- Avoid using generic email addresses (e.g., info@abcschool.edu) or fax numbers so PIA inquiries are not lost in a general inbox
- Add *@sl.universalservice.org domain to your safe senders list to avoid PIA email going to your junk mail

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PIA Review Tips

■ Review your Form 471

- Make sure all the entities listed on the Block 4 are receiving service for that fund year
- Make sure you did not include ineligible entities on your application

■ Review your RAL

- Make sure your funding requests are accurate
- Submit timely RAL corrections
- Do not wait until a PIA reviewer contacts you to submit your corrections (**Remember your deadline**)

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PIA Review Tips

■ Documents, Documents (USE THE E-RATE BINDER)

- Discount calculation (NLSP data, surveys, student enrollment count, etc.)
- Competitive bidding documents (e.g., RFPs, bid evaluation sheets, memos, award notices)
- Contracts (signed & dated), Purchase Orders
- Consortium Letters of Agency
- Consultant agreements, if applicable
- Technology Plans (written & approved plans)
- Approved or draft budget
- School Charter, Board Papers

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PIA Review Tips

- Communicate with your reviewer
 - Ask questions if you don't understand
 - Ask for an extension if you need more time to respond
 - Let the reviewer know if you will be available to respond to inquiries
 - PIA managers are also available for additional assistance
 - Answer all questions completely

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PIA Review Tips

- Same question Same response
 - You may reference previously submitted responses (provide application # and FRN)
- Review your documentation you send to PIA before you send it
 - Make sure the documentation is applicable to the FRNs under review
 - Check contracts and/or LOAs dates & signatures
 - Cost allocations must be based on tangible evidence that reaches a realistic result
 - Discrepancies among documents and forms will generate additional questions from PIA

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Questions?

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