

## E-Rate in FY 2016 and the E-Rate Modernization Orders

**E-Rate Training** 

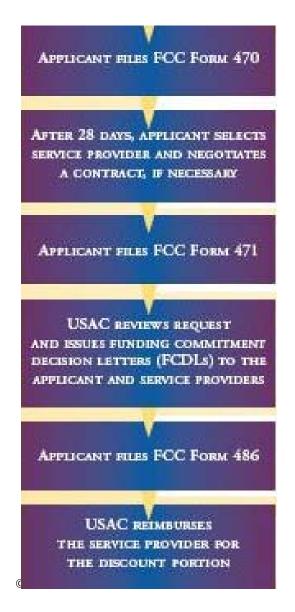
**Presented by E-Rate Central** 

www.e-ratecentral.com



- Basic E-rate application and invoicing cycle
- Introduction to the E-rate Modernization Orders
- Eligible Services List for FY 2016
  - Review of Category 1 changes as of FY 2015
  - New Category 1 fiber changes for FY 2016
  - Category 2 funding, eligibility, and budgets
- Review of discount rate changes
- New E-rate Productivity Center ("EPC")





## Basic E-Rate Cycle

- 1. File Form 470 (and RFPs)
- 2. Wait 28 days (vendor selection period)
- 3. File Form 471 (application)
- 4. PIA review and FCDL
- 5. File Form 486 (confirmation)
- 6. Submit invoices to USAC (BEAR or SPI)



#### Review of Modernization Orders

- Refocus E-rate on broadband to the classroom
  - Set broadband goals for schools and libraries
  - Target "predictable" funding for internal Wi-Fi connections
    - Fund Wi-Fi by eliminating or phasing out support for Priority 1 "legacy" services
    - Increase E-rate funding cap by \$1.5 billion
- Update rules on competitive bidding, contracts, discount rates, electronic filing, technology plans, and more



#### Performance Goals

- Affordable access to ConnectEd broadband goals
  - Schools: Internet at 100 Mbps per 1,000 students short-term and 1 Gbps per 1,000 students long-term
  - Libraries: Internet at 100 Mbps for populations under 50,000 and 1 Gbps for larger populations
  - WAN connectivity "scalable" to 10 Gbps
- Maximum cost-effectiveness of purchases
- Fast, simple, and efficient E-rate process



## Major Changes for FY 2016

- New Category 1 fiber eligibility and funding
- All FY 2016 forms submitted through new EPC portal
  - Applicants (and consortium members) need fully functional EPC accounts
  - Form submission and certification are simultaneous.
- New procurement requirements
  - RFPs uploaded with Form 470s
  - Category 1 fiber bids must meet strict procurement rules
- Direct payment on BEARs



## Eligible Services List for FY 2016

#### New Category Designations

- Old "Priority 1" and "Priority 2" designations dropped in 2015
  - Category 1: Services that enable Broadband connectivity to the school/library
  - Category 2: Services that enable Broadband connectivity within the school/library
- Targeted funding to be available for both C1 and C2



## Eliminate, Phase-Out, or Narrowly Define Support for "Legacy" Services

Category 1

## Ineligible Category 1 Services for FY 2016

- Webhosting
- Paging, email, text messaging, and voice mail
- Telephone service components directory assistance charges, custom calling services, direct inward dialing, 900/976 call blocking, and inside wire maintenance plans

#### Wireless Data Plans and Air Cards

- Basically ineligible
  - Technically: Data plans and air cards for mobile devices will continue to be eligible for E-rate support only in instances where the school or library seeking support demonstrates that individual data plans are the most cost-effective option for providing internal broadband access for portable mobile devices at schools and libraries
  - Related Form 470 requires RFP

#### Voice Service Phase-Out

- Applies to all voice services: Local phone service, long distance service, plain old telephone service (POTS), 800 service, satellite telephone, shared telephone service, Centrex, cellular voice, and interconnected VoIP
- Phase out schedule: 20 percentage points will be deducted from the eligible discount percentage each year beginning with FY 2015



#### Voice Service Phase-Out Table

Approved Discount % from Block 4	For FY2015	For FY2016	For FY2017	For FY2018	For FY2019
90	70%	50%	30%	10%	0
80	60%	40%	20%	0	
70	50%	30%	10%	0	
60	40%	20%	0		
50	30%	10%	0		
40	20%	0			
25	5%	0			
20	0				

→ minus 40%

#### Enhanced Fiber Eligibility under E-Rate 2.1

- No amortization of installation charges on large projects
- "Modulating" electronics eligible as Category 1

#### As of FY 2016:

- Special construction charges for dark fiber become eligible
- "Self-provisioned" fiber purchases become eligible, <u>if</u>...
- Installment payments for non-discounted installation charges
- Additional 10% funding available with state-matching

#### Enhanced Fiber Eligibility (cont'd)

#### Cautions:

- Bid evaluations for dark fiber, IRUs, and owned fiber must be compared with <u>lit</u> fiber solutions
- Bid evaluations must fairly compare all costs of alternatives
- Best practices indicate:
  - Complete RFPs
  - Sufficiently long bidding periods



## Support of Internal Connections

Category 2

## Category 2 Equipment & Services

- Basic: Cabling, routers, switches, wireless access points
- At least through FY 2019:
  - Maintenance of basic LAN equipment
  - Managed Wi-Fi
  - Caching servers
- Newly <u>ineligible</u>:
  - All other servers
  - Telephone systems (including VoIP)



#### Category 2 Budgets

- Each eligible school shall be eligible for support for Category 2 services up to a pre-discount price of \$150 per student over a five-year funding cycle
- Library Category 2 funds limited to \$2.30 per square foot (\$5.00 per square foot for large urban libraries)
- Minimum pre-discount funding per school or library is \$9,200
- Category 2 funding in any given year is not assured, but should be available at all (or most) discount levels
  - Major unknown: Category 1 demand for large fiber networks



#### Category 2 Budgets (cont'd)

- Budget is per school or library summed over all applications
  - Not per district or library system
  - Existing school budgets may rise or fall over the five year period as student count changes. Budget cuts do not impact earlier funding
  - New schools may estimate the number of students, but shall repay any support provided in excess of the maximum budget based on student enrollment the following funding year
- Support is **not** available for Category 2 services provided to administrative buildings ("NIFs")
  - But common equipment can be allocated to schools and libraries wherever it is located





#### Category 2 Budgets (example)

- Red School District qualifies for 50% discount rate
- There are 1,000 students in total. The High School has 550 students, but 10 Middle school students take advanced classes there.

School	F/T & P/T Students x	Pre-discount Category Two Budget	Post-discount Category Two Budget
Red Elementary	100	$100 \times 150 = 15,000$	$15,000 \times 50\% = 7,500$
Red Middle School	300	$300 \times 150 = 45,000$	$$45,000 \times 50\% = $22,500$
Mountain Top Elementary	50	$50 \times 150 =  9,200 \text{ (min.)}$	$$9,200 \times 50\% = $4,600$
Red High School	560	$560 \times 150 = 84,000$	$$84,000 \times 50\% = $42,000$
District Office	0	\$0 (NIFs don't qualify)	\$0 (NIFs don't qualify)

- Totals: 1,000 students for discount rate purposes;
- 1,010 (effectively 1,021) students for Category 2 budget purposes





#### Category 2 Budgets (example)

 Shared service allocation example – \$30,000 pre-discount cost for School A with 250 students, School B with 500 students, and School C with 750 students.

Straight line	Proportional by students	Specific (e.g., usage)	
A = \$10,000	A = 250/1500 x \$30,000 = \$5,000	A uses 30% = \$9,000	
B = \$10,000	B = 500/1500 x \$30,000 = \$10,000	B uses 15% = \$4,500	
C = \$10,000	C = 750/1500 x \$30,000 = <u>\$15,000</u>	C uses 55% = <u>\$16,500</u>	
\$30,000	\$30,000	\$30,000	



#### Category 2 Budgets (cont'd)

- Managing "over-budget" situations are critical
  - Separate FRNs for separate budget entities may be preferable
  - Include all eligible line items
  - Reduce pricing proportionally to stay within budget
  - Use "Narrative" to further explain requests
- 5-year budget cycle management
  - Cancel unused funding to free up budget(s) for future years
  - Begin 5-year cycle as early as possible



#### Discount Rate Issues



#### Revised Discount Matrix

	Category one schools and libraries discount matrix Discount level		Category two schools and libraries discount matrix Discount level	
% of students eligible for National School Lunch Program	Urban discount	Rural discount	Urban discount	Rural discount
< 1	20 40 50 60 80 90	25 50 60 70 80 90	20 40 50 60 80 85	25 50 60 70 80 85



#### Discount Rate Calculations

- Each school or group of schools in a school <u>district</u> must use the single district-wide "matrix" discount rate for <u>all</u> funding requests
  - An Educational Service Agency ("ESA") applicant without its own schools
    determines its discount using all E-rate eligible students in schools that fall
    under the control of the central educational agency
  - Technical and special education schools are allowed to double-count students attending part-time with "snap-shot" counts
  - Private or charter schools, operating as a group under the same administration and finances, must use a single district-wide "matrix" discount rate for all funding requests (i.e., treated like a district)



#### Discount Rate Calculations (cont'd)

- An individual library uses the eligibility percentage of the district where library is located
- All libraries in a library <u>system</u> must use the single system-wide "matrix" discount rate for <u>all</u> funding requests using the eligibility percentage of the district where the <u>main</u> branch of the library system is located
- School and/or library consortium applicants must average each member's district-wide discount for each application



#### Consortium Discount

- Based on simple average of member discounts
- Consortium is the only type of applicant that can have a nonmatrix discount
- Consortium discount applies to <u>all</u> FRNs within an application
- USAC will prioritize application review for state and regional consortium applicants — already in effect for FY 2014
- Consortium membership LOAs must be in place prior to filing the Form 470



## Community Eligibility Provision (CEP)

- Districts and schools participating in the CEP will determine their discount percentage by using the same approach as that for NSLP eligibility under CEP, i.e., the percentage of direct certified children times the CEP Multiplier – presently 1.6 – not to exceed 100% student eligibility
- The CEP discount percentage direct cert x 1.6 may be used for up to 4 years
- If applicant adjusts its calculation of CEP, the change must be applied to its E-rate discount



#### Survey Method for Discount

- Discount determination based only on surveys received in reference to total student population (no extrapolation allowed):
  - Example 100 total students are all surveyed. Assume 60 surveys are returned – of those, 52 surveys indicate students are eligible for Free or Reduced lunch
    - Previously: 52 of 60 students eligible = 87% eligibility extrapolated to 100 students meant a 90% discount
    - As of FY 2015: 52 of 100 students eligible = 52% eligibility means an 80% discount



#### Urban - Rural Determination

- Census data will be used for determining urban/rural status
  - "Urban clusters with populations under 25,000 are "rural"
- A district or library system with a <u>majority</u> of entities considered rural will receive the benefit of rural status
- USAC has posted a tool on its website to allow applicants to quickly find the urban/rural status of their entities
  - U/R tool may return "Invalid Address"



## New Mexico-Specific Considerations

- The State of New Mexico and PED released a Form 470 and RFP for Category 2 equipment.
- The Broadband Deficiencies Correction Program is working with ESH to determine bandwidth needs.
- Working with school districts who don't have fiber to seek fiber and higher bandwidth.
- Providing matching funds for fiber and electronics.

# USAC's New E-Rate Productivity Center ("EPC")

#### EPC Required for All FY 2016 Activities

- Accounts needed for <u>all</u> applicants, consultants, and service providers
- Initial setup required by primary organization contact
- Primary contact was set up using the person who certified last year's applications.

#### Different Users Have Different Rights

- Individual users identified by email address
- Account Administrator is the controlling user
- Full rights users can submit/certify forms
- Partial rights users can draft forms
  - "Save and Continue" vs. "Save & Share"
- View-only rights users can see only some information.
  - State coordinators have targeted view-only rights

#### E-Rate Forms Must Be Filed Through EPC

- Posting and certification required together
  - Warning: Passwords need to be reset every 60 days
- EPC version of Form 470 available now
  - RFPs, if used and/or required, must be uploaded first
  - "Cardinal" change is an addendum issue
  - Form 470 tracking tools are terrible
- EPC version of Form 471 under development
  - Target is January 2016
  - Consortium discount rates determined by each member

#### Other Developments

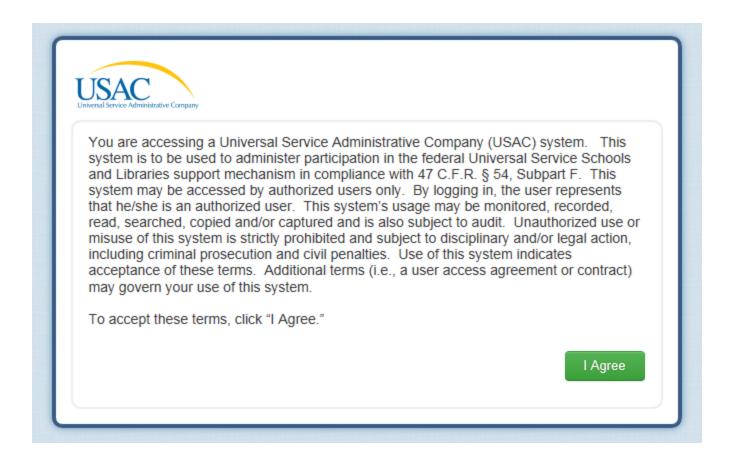
- Form 498 required for direct payments of BEARs
  - EPC version of Form 498 is available now
  - Hard cutover to EPC version of Form 472 ("BEAR") is July 1, 2016
- EPC will have option to upload contracts
- EPC may have option/requirement to upload bids and assessments

# Potential EPC Problems

- EPC is under development and changing weekly
- Different users have different views and rights
- Lists are unmanageable and often unsearchable
- Terms of use agreement are limiting
  - Email addresses and passwords are not to be shared
  - Robotic access to data is prohibited
- System usage is not intuitive



# EPC on Tour







41



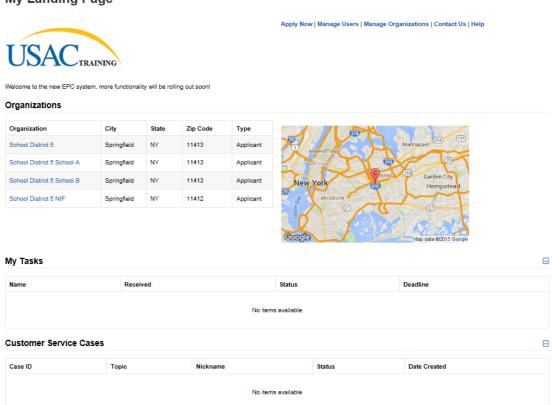
### **My Landing Page**

FCC Forms 470

Nickname

Funding Year 2016

Application Number



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No items available

**~** 

O Incomplete
O Certified

**Funding Year** 



## My Landing Page



Welcome to the new EPC system, more functionality will be rolling out soon!

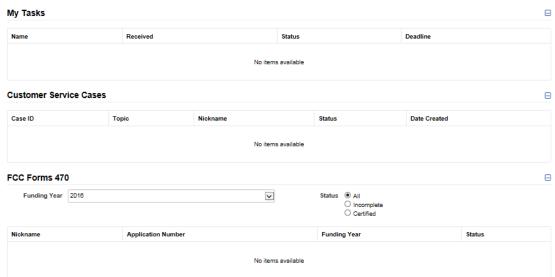
#### Organizations



Organization	City	State	Zip Code	Туре
School District 5	Springfield	NY	11413	Applicant
School District 5 School A	Springfield	NY	11413	Applicant
School District 5 School B	Springfield	NY	11413	Applicant
School District 5 NIF	Springfield	NY	11412	Applicant



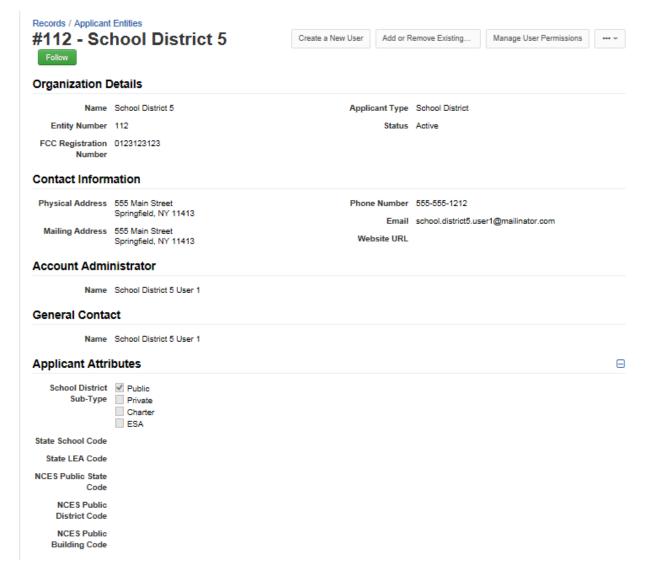
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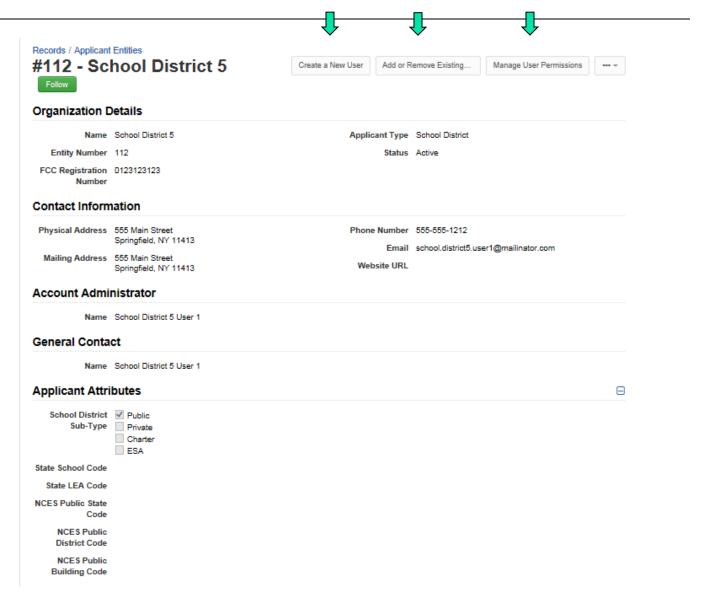
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Related Actions
Customer Service Cases
Related Entities
Consulting Firms
Consortia Organizations
Modifications
FCC Forms 470







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FCC Forms 470

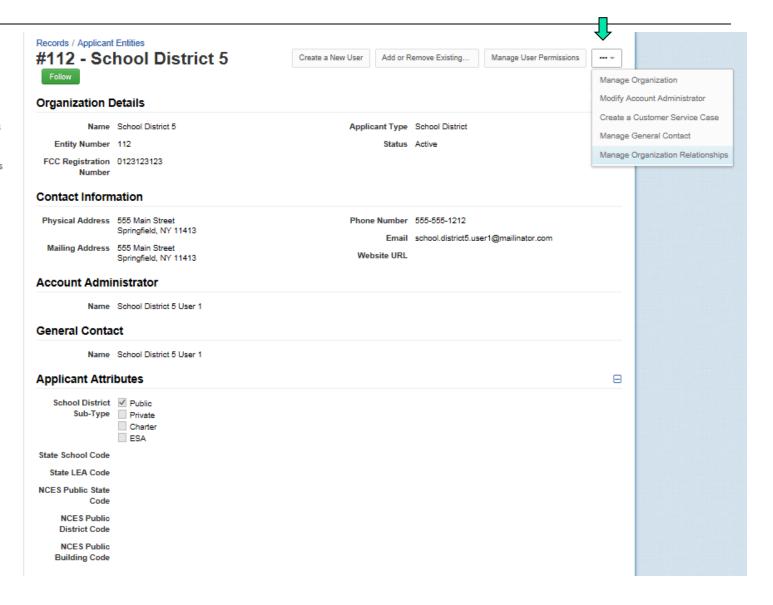








News
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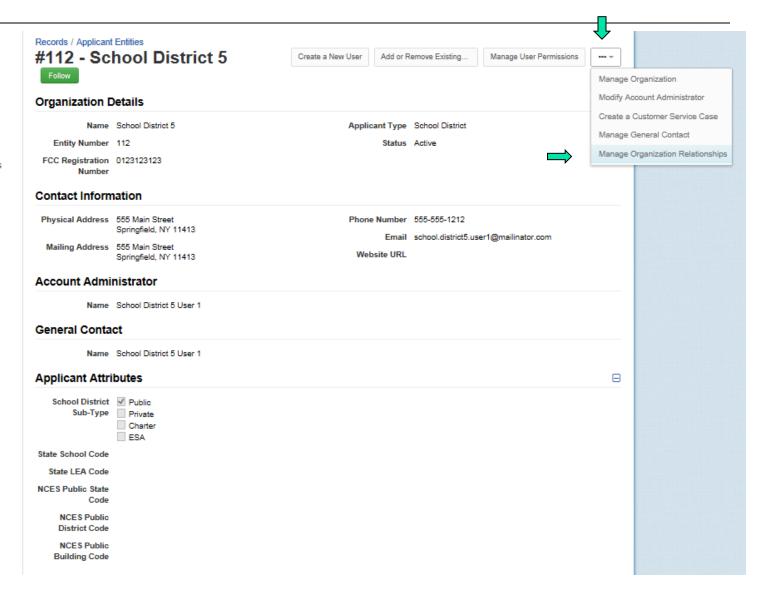




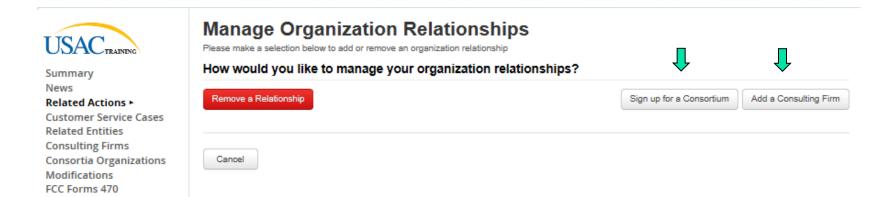




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Customer Service Cases
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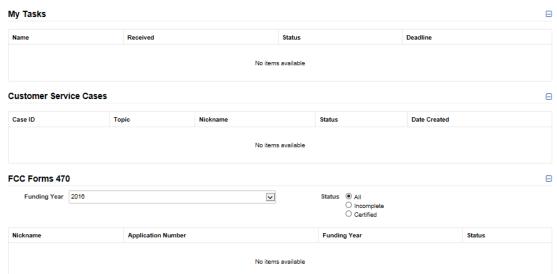
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School District 5 School A	Springfield	NY	11413	Applicant
School District 5 School B	Springfield	NY	11413	Applicant
School District 5 NIF	Springfield	NY	11412	Applicant



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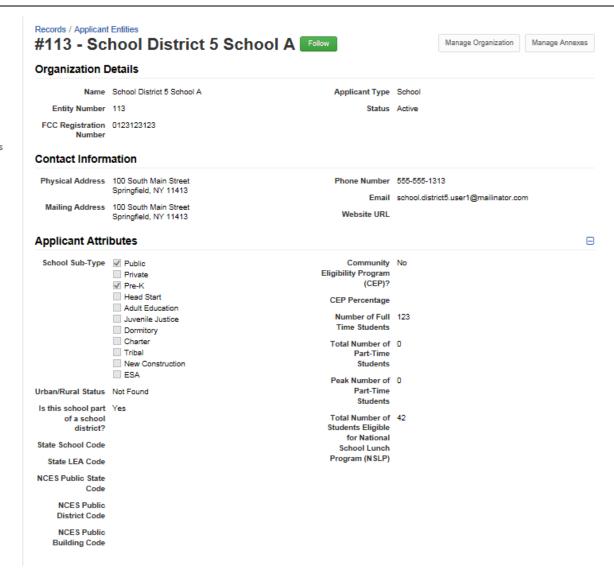


#### Summary **\***

News

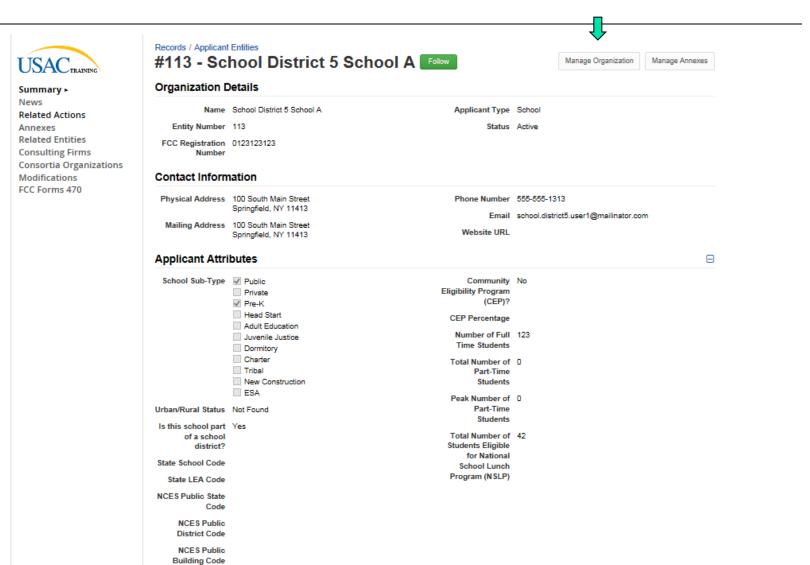
#### Related Actions

Annexes
Related Entities
Consulting Firms
Consortia Organizations
Modifications
FCC Forms 470



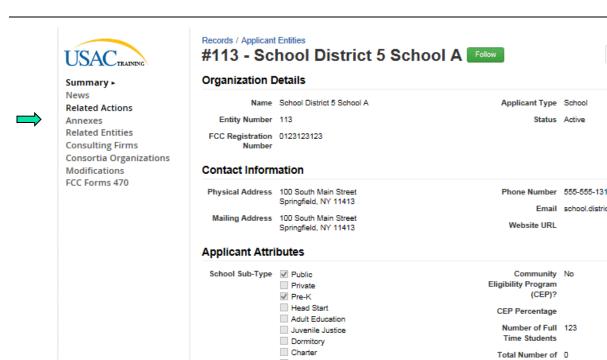


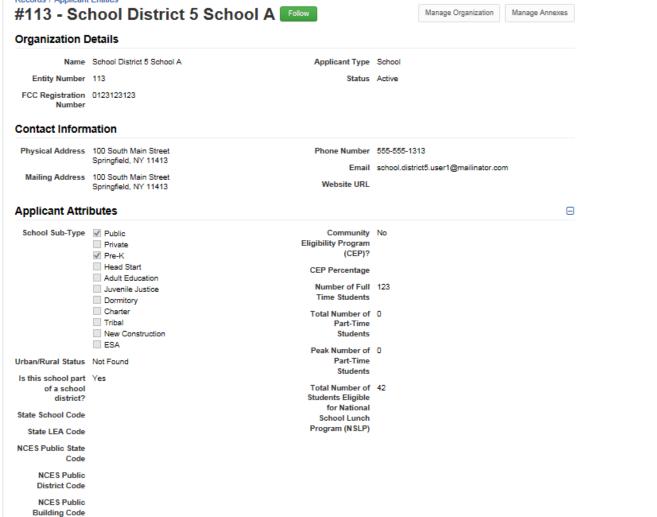














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# Alternate access points

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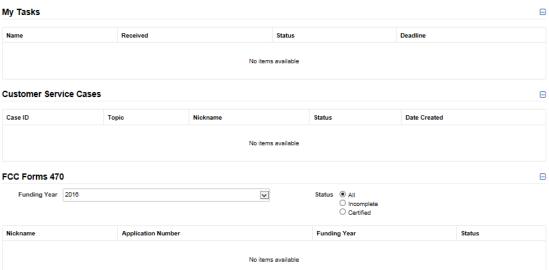


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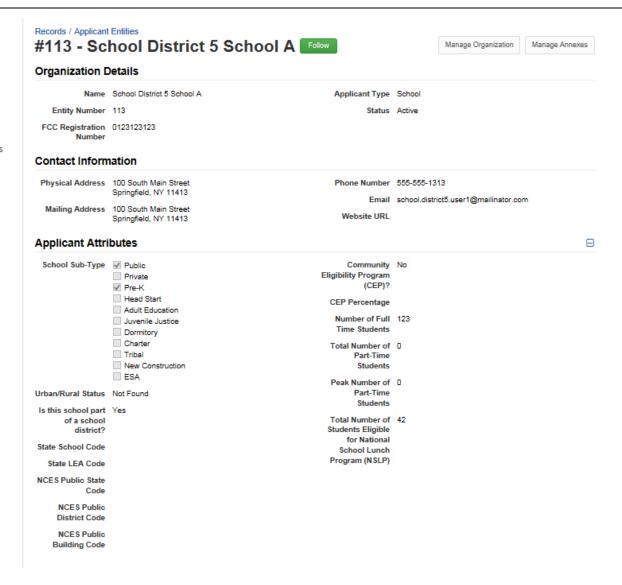
Alternate access point

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Summary News

#### Related Actions >

Customer Service Cases Related Entities Consulting Firms Consortia Organizations Modifications FCC Forms 470

#### Records / Applicant Entities

### #112 - School District 5 Follow



This function allows you to create a user for your entity.

### Add or Remove Existing Users

This process allows user to add and remove users from an organization

### Manage User Permissions

This function allows you manage the permissions for one or more users.

### Manage Organization

This function allows you to update information about an entity or BEN.

#### Modify Account Administrator

This process allows you to transfer the Account Administrator function to another individual.

#### Create a Customer Service Case

This function allows you to submit a question about an E-rate form or topic. You can also submit a specific request or an attachment.

#### Manage General Contact

This function allows you to designate the general contact for your entity.

#### Manage Organization Relationships

Process to relate an Organization to another Organization

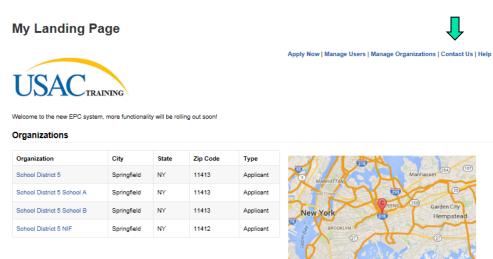
#### Create FCC Form 470

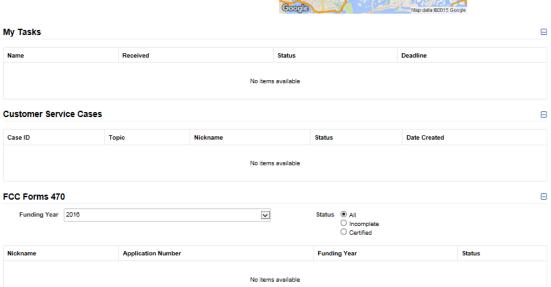
This function allows you to create an FCC Form 470 for your entity.

### Create FCC Form 498

This function allows you to create an FCC Form 498 for your entity.

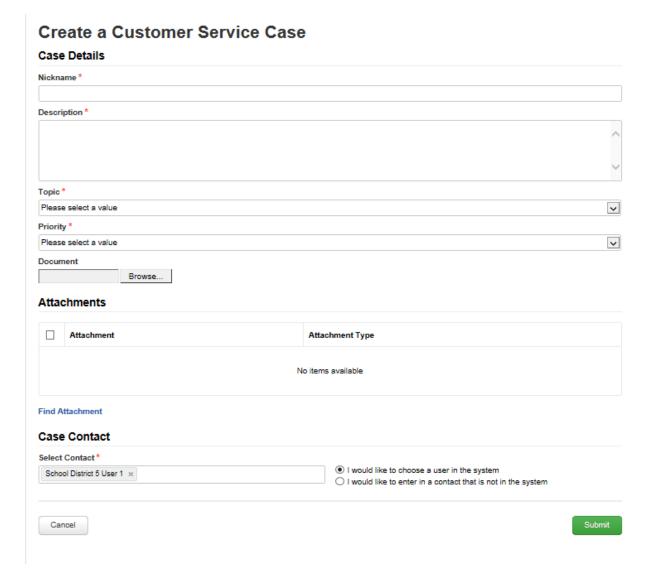














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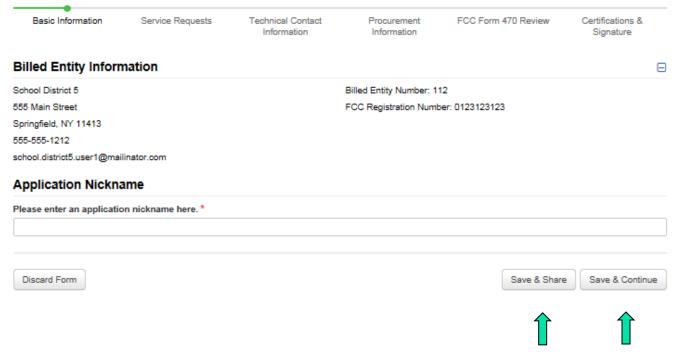








# FCC Form 470 - Funding Year 2016

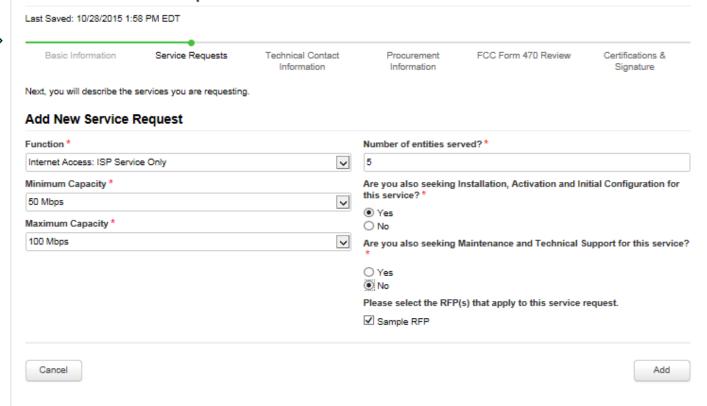






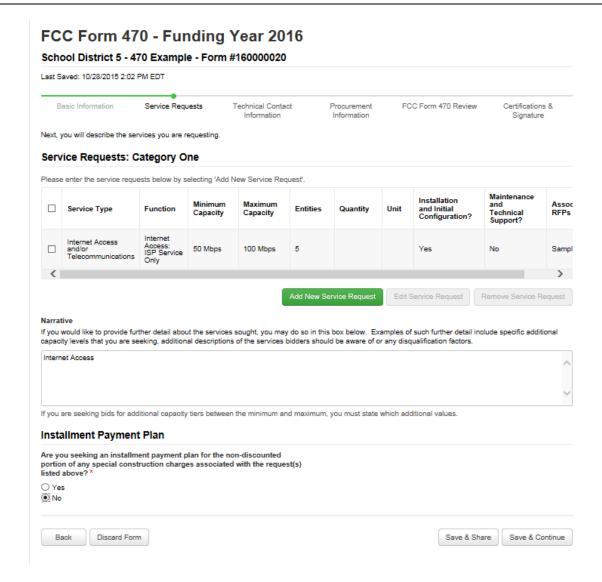
## FCC Form 470 - Funding Year 2016

#### School District 5 - 470 Example - Form #160000020





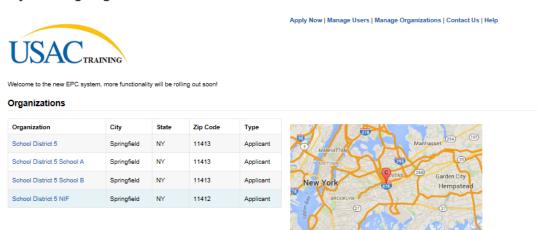






### **My Landing Page**

My Tasks





FCC Forms 470

Funding Year 2018

Status 
All
O Incomplete



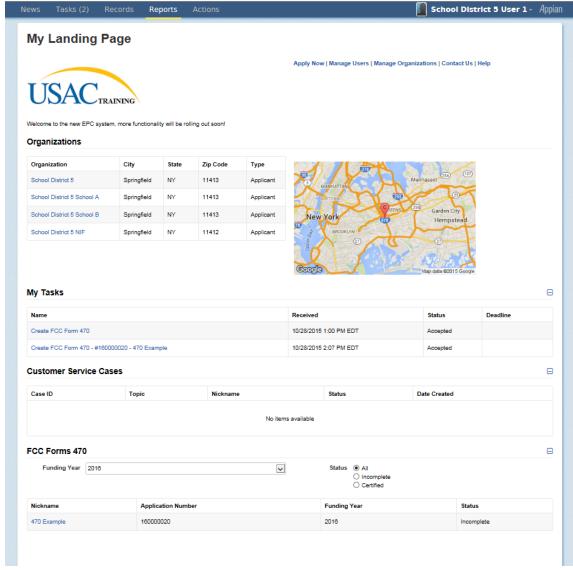
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 Application Number
 Funding Year
 Status

 470 Example
 160000020
 2016
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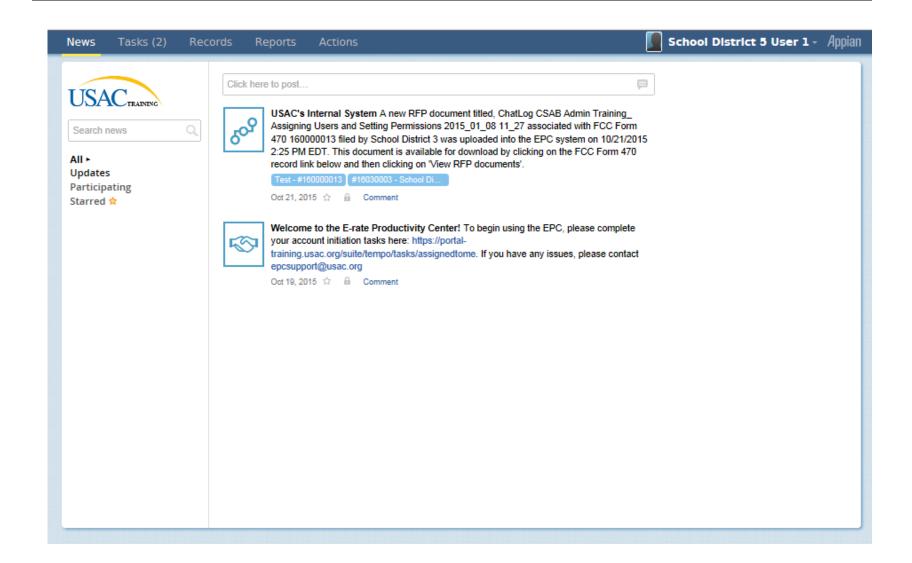
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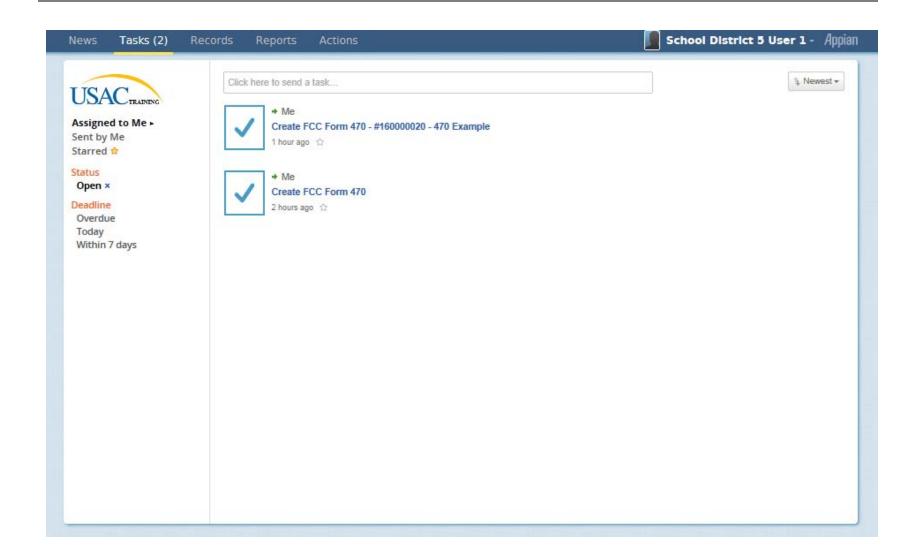




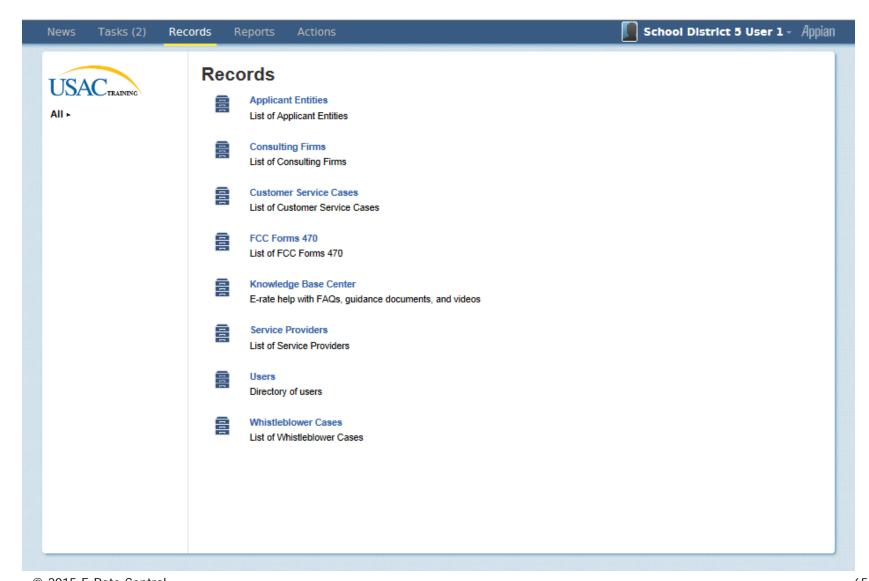




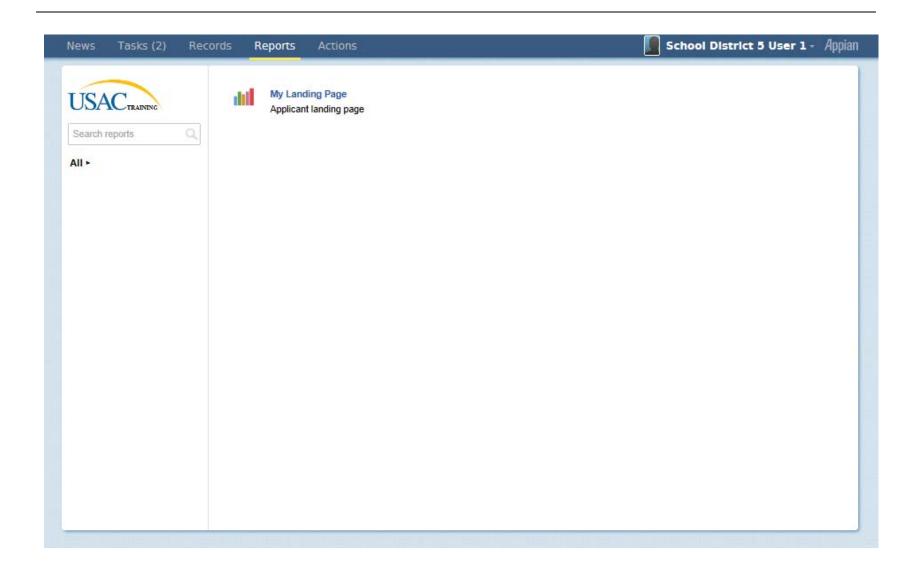




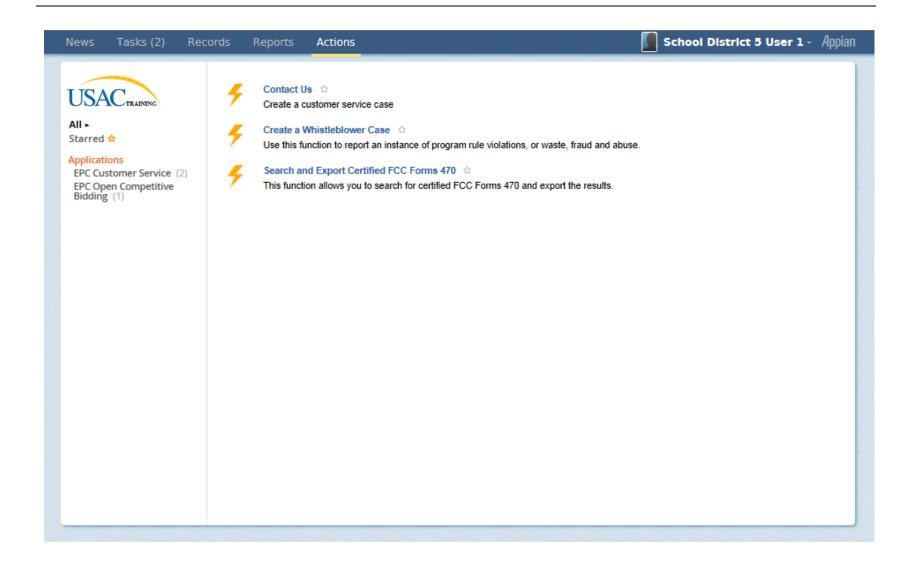














# Other Procedural Changes



# Invoice Filing Deadlines

- FCC codifying existing invoice filing (BEAR & SPI) deadline process allowing applicants to request and automatically receive a single one-time 120-day extension of their invoicing deadline
  - Invoice deadline extension requests must be made no later than the existing initial deadline for filing BEAR or SPI requests
  - USAC not allowed to grant further invoice deadline extension requests
  - Waivers by the FCC may be granted only in extraordinary circumstances



# Appeal Rules

- All appeals of USAC decisions must be made to USAC as a first step before filing appeals with the FCC
- Applicants seeking only a waiver of the rules may address the waiver request directly to the FCC
- When in doubt, file with USAC first



# Document Retention

- The document retention period has been extended from five to 10 years after the latter of the last day of the applicable funding year, or the service delivery deadline for the funding request
- Documents retained by EPC does not relieve applicants of retaining their own documents (but can help)
  - Submitted E-rate forms
  - RFPs (and bids?)
  - Contracts



# FY 2016 Will Be Challenging!

- EPC is new and still under development
  - Use is neither easy nor intuitive
  - Many applicants do not yet have accounts
- New EPC-based Form 470 and Form 471
  - New RFP requirements particularly for fiber
  - New discount rate issues for consortia
- New Form 498 required for direct BEAR payments



# Additional Information

Website: www.usac.org/sl/

Portal: portal.usac.org



# E-Rate Central

Website: <u>www.e-ratecentral.com</u>

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