

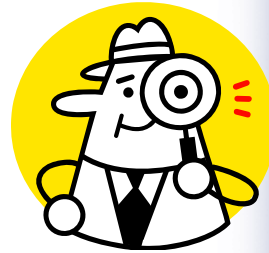
# E-Rate: PIA Process

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## Agenda



- What is PIA and what is its purpose
- Reminders
- Let's think like an auditor



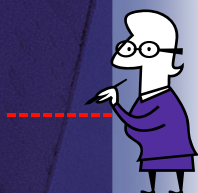
## PIA

- **Program Integrity Assurance** – the USAC group that reviews and makes funding decisions on program applications



## PIA

- They review applications for compliance with FCC rules such as
  - Eligible entities
  - Eligible services
  - Competitive bidding process and contracts
  - Proper discount calculations
  - Ability of applicants to pay their share
  - Proper posting of forms



## When PIA calls:



- Provide documentation in a timely manner
  - The efficiency of the PIA process will depend on the availability of your staff and the condition of the documentation made available prior to and/or during the course of the questions
- Ask questions to ensure you are providing adequate documentation
- Keep accurate and organized records
  - E-Rate binder, organized by Funding Year
- **DOCUMENT everything**

## Eligible Entities



- PIA will review every item listed on Block 5 with supporting documentation listed on the Item 21 attachments
  - When possible, use exact language listed in the Eligible Services List (ESL)
- Make sure that the location of the components or services are correct in Block 5, Item 22.
  - Shared services: use the worksheet #
  - Site specific: use the correct entity #

## Eligible Services:

- Make sure the items requested are eligible as listed on the ESL and that they are used as indicated
- Carefully read the ESL to make sure you understand and can explain what you are requesting when PIA calls



## Competitive Bidding:

- Be able to reproduce all documents that clearly indicate how you selected the 'most cost effective bidder'
  - Use some type of evaluation template
- Be able to show that the bid you accepted is 'cost effective' if asked
- If more than one person evaluates, be able to produce all signed and dated copies of evaluation forms



## Competitive Bidding (con't):

- Signed and dated contracts, service agreements, notice of award letters, etc.
- Contract amendments, addendums, extensions, etc.
- State contracts



## Discount Calculation

### PIA reviewers may request:

- Report of NSLP, Survey, Provision I, II, III numbers, etc., used to complete Block 4 of Form(s) 471
  - They will expect report data to match the data on Block 4
- NSLP, Provision I, II, or III documentation submitted to TEA
- If using NSLP numbers – evidence of verification per USDA guidelines
- Sample of applications or surveys collected





## Discount Calculation

### Common Problems

- Applicant can not provide discount calculation data used to complete Block 4 of Form(s) 471. PIA must be able to perform recalculation of discount using other available data
- Applicant uses ineligible discount calculation method
- Applicant uses NSLP applications as survey



## Budget



- All items being purchased and supported by E-Rate have to be clearly listed within the budget for the funding year it's requested (draft), including the funding source
- The budget must provide sufficient resources to acquire and support the non-discounted elements of the plan: the hardware, software, professional development and other services that will be needed to implement the strategy



## Posting Forms:

- Forms must be posted on or before the deadline date:
  - **470**: 29 days before the close of the 471 window
  - **471**: Set by the FCC each year, usually in February sometime
    - If not submitted by close of the window there's little chance of getting funded
    - There is a 15 day reprieve on certifications if the application was completed prior to the close of the window



## Posting Forms:

- Forms must be posted on or before the deadline date:
  - **486**: must be postmarked or received no later than 120 days after the SSD or FCDL, whichever is later
  - **472**: must be postmarked or received no later than 120 days after the last date to receive service or no later than 120 days after the date of the Form 486 Notification Letter, whichever is later.

## Contact Information

- E-Rate Support  
[erate@esc12.net](mailto:erate@esc12.net) 254-297-1123
- Technology Planning  
[techplan@esc12.net](mailto:techplan@esc12.net) 254-297-1275
- STaR Chart Support  
[starchart@esc12.net](mailto:starchart@esc12.net) 254-297-1275

# Questions?