



EMERGENCY CONNECTIVITY FUND

THINGS YOU NEED TO KNOW

AGENDA

PROGRAM OVERVIEW

- APPLICANT ELIGIBILITY
- GETTING STARTED
- ELIGIBLE COSTS

PROGRAM COMPLIANCE

APPLYING FOR FUNDING

QUESTIONS





INTRODUCTION

EMERGENCY CONNECTIVITY FUND

Enacted May 10, 2021 and part of the American Rescue Plan Act, \$7.17 Billion for E-rate eligible schools and libraries to connect students, school staff, and library patrons that lack Internet access **away** from a school or library campus.

Funding is limited to purchase of eligible equipment and services for students, school staff, and library patrons (including staff who meet program criteria) who would otherwise lack access to **sufficient** Internet connectivity and devices.

ELIGIBILITY

WHO	WHAT	WHERE	TIMING
<ul style="list-style-type: none"> Schools, libraries, and consortia of schools and libraries that are eligible for support under the E-rate Program* Tribal libraries** 	<p>100% reimbursement (except caps)</p> <ul style="list-style-type: none"> Wi-Fi hotspots Modems Routers Devices that combine a modem and router Connected devices: Laptop and tablet computers 	<p>Away from a school or library campus.</p>	<p>45-DAY FILING WINDOW June 29-August 13, 2021</p> <p>FOR EXPENDITURES FROM July 1, 2021-June 30, 2022</p>

*Even if they do not currently participate in the E-rate Program

**Tribal libraries, which are by statute eligible for support from state library administrative agencies under the LSTA, are eligible for support from the Emergency Connectivity Fund.

E-RATE DEFINITION OF A LIBRARY

EMERGENCY CONNECTIVITY FUND

- A public library
- A public elementary school or secondary school library
- An academic library
- A research library
- A private library, but only if the state in which such private library is located determines that the library should be considered a library for the purposes of this definition.”

Additionally, a library may also refer to a library consortium, which is defined as “any local, statewide, regional, or interstate cooperative association of libraries that provides for the systematic and effective coordination of the resources of schools, public, academic, and special libraries and information centers, for improving services to the clientele of such libraries.”

GETTING STARTED

MUST HAVES

FCC Registration Number

Schools, libraries, and service providers that have agreed to invoice on behalf of applicants must have an FCC Registration Number to participate in the ECF Program.

Obtain an FCC Registration Number by visiting the FCC's Commission Registration System ([CORES](#)) and completing the registration process.

Billed Entity Number

USAC is copying all existing E-rate entity numbers (also known as billed entity numbers or BENs) and their associated entities and their information into the ECF Portal.

Schools and libraries that are not registered in EPC and do not have an entity number in EPC will need to obtain one

Registration with SAM.gov

Schools, libraries, and service providers who agree to invoice on behalf of the applicants must have an active registration with the federal System for Award Management ([SAM.gov](#))

SAM.gov registration is necessary for all entities that receive funds from the U.S. government.

Can take over a week to be approved

ELIGIBLE COSTS, DEFINED

BROADBAND CONNECTIONS

- **Broadband Equipment**
Wi-Fi hotspots, modems, and routers, including cellular air-cards, will qualify for reimbursement. Wi-Fi hotspots will be capped at **\$250** per device.
- **Broadband Services**
There are no minimum standards for network connections. One Wi-Fi hot spot is allowed **per user**, and, for fixed internet connections, only one service connection is allowed **per location**. There are no price caps for broadband services but USAC will review costs for reasonableness.
- **Limited Support for Off-Campus Networks**
Where applicants can prove there is **no commercially available** internet access, applicants may seek funding for construction of such networks.

ELIGIBLE COSTS, DEFINED

CONNECTED LEARNING DEVICES

Laptops and Tablets

The Commission will approve reimbursement requests up to \$400 for laptops and tablets. Smartphones will not be approved. One connected device per student is allowed. There is no allowance for breakage/spares. Applicants can purchase more expensive devices, but reimbursements will be capped at the **\$400** limit.

ELIGIBLE COSTS, DEFINED

SELF-PROVISIONED NETWORKS

Only in limited instances where applicants are able to demonstrate that no commercially available options and that services were provided to students, school staff, or library patrons during the COVID-19 emergency period.

- Eligible costs include monthly charges, special construction, installation and activation charges, modulating electronics and other equipment necessary to make a broadband Internet access service functional and maintenance and operation charges.
- The eligible components of special construction are construction of network facilities, design and engineering, and project management.
- Customer premises or end-user equipment to receive datacasting services.

INELIGIBLE COSTS, DEFINED

BROADBAND CONNECITONS

Equipment	Services	Unbundled Costs
<ul style="list-style-type: none">• Full 1:1 devices where no unmet need exists• Desktop computers, smartphones, and peripherals.• Accessories beyond a power cord• Replacement of lost, stolen, or damaged devices• Electronics to light dark fiber*	<ul style="list-style-type: none">• Full 1:1 Internet where no unmet need exists• Device and network monitoring and management• Administrative costs• Private networks if commercially available Internet service exists• Cybersecurity and filtering• Dark fiber*	<ul style="list-style-type: none">• Software and user licenses• Firewalls• Warranties and maintenance



PROGRAM COMPLIANCE

LET'S DIVE IN

COMPLIANCE

COMPETITIVE BIDDING

Procurement Requirements

Schools and libraries seeking funding from the Emergency Connectivity Fund Program will be required to **certify** that they have complied with all applicable local, state, and Tribal procurement requirements with respect to **both** previous purchases and future purchases and contracts.

This requires schools and libraries that are not subject to public procurement rules to follow their own procurement processes and rules, such as those that may be included in a written charter. Unlike the E-rate program, schools and libraries may seek support for the cost of eligible equipment and services purchased without having conducted an FCC-mandated competitive bidding process for purposes of the Emergency Connectivity Fund Program.

COMPLIANCE

DUPLICATIVE SERVICES

No double-dipping.

If a patron's household **is receiving** support from the Emergency Broadband Benefit (EBB) Program for broadband internet access connectivity, the patron would not be eligible for broadband connectivity under the ECF Program.

However, if EBB funding were to **run out**, a library could seek funding to provide internet access to that household.

COMPLIANCE

UNMET NEED

82. We recognize that libraries do not usually inquire about the needs of their patrons before providing services. They do, however, typically have acceptable use policies governing patron use of library computers and Wi-Fi hotspots. To ensure that libraries are providing eligible equipment and services to patrons with unmet needs, we therefore require that on a going forward basis before providing a library patron with eligible equipment or services, for which the library is seeking Emergency Connectivity Fund support, the library must provide the patron a copy of an eligible use policy, which explains that the equipment or service is intended for library patrons who do not otherwise have access to equipment or services sufficient to meet the patron's educational needs. On a going forward basis, we also **require** that the library patron sign and return a statement that the library patron would otherwise lack access to equipment or services sufficient to meet the patron's educational needs if not for the use of the equipment or service being provided by the library.

COMPLIANCE

PRIVACY CONCERNS

California Government Code sections [6267](#) and [6254\(j\)](#) exempt certain library records from disclosure.

Executive Order [B-22-76](#).

Response from FCC

We appreciate that this is a sensitive issue and are working to provide guidance where possible to address the concerns libraries have raised.

One additional thought we had would be to include language on the required statement that details privacy protections, but requires patron consent that information would be provided if required. It could help address concerns about unauthorized disclosure in the event the FCC/USAC were to request a copy of the forms.

CIPA COMPLIANCE

FCC-21-58A1

“CIPA applies to a school or library “**having**” computers and requires the entity to certify compliance as to “**its**” computers.

Both words indicate that CIPA is triggered by **ownership** of a device, not the location where the device is used or temporarily possessed.”

CIPA COMPLIANCE

The Children's Internet Protection Act (CIPA)

CIPA Applies	CIPA does not Apply	CIPA does not Apply
On school or library-owned computers, if the school or library accepts Emergency Connectivity Fund or E-Rate support for Internet access or Internet services, or E-rate support for internal connections.	On school or library-owned computers, if the school or library does not accept Emergency Connectivity Fund or E-rate support for Internet access or Internet services, or E-rate support for internal connections	On third-party owned devices, even if the school or library receives Emergency Connectivity Fund or E-rate support for Internet access or Internet services, or E-rate support for internal connections.

COMPLIANCE

10-YEAR DOCUMENT RETENTION

Broadband service

- Type of service
- Upload/download speeds and monthly data cap
- Person receiving service
- Fixed broadband service
 - the service address
 - date(s) service received.

Equipment requirements

- Device type
- Make/model
- Serial number
- Person receiving device
- The dates the device was
 - loaned out
 - returned to the school or library.



APPLYING FOR FUNDS

ECF FCC FORM 471

BEFORE YOU BEGIN

THINGS TO THINK ABOUT

Develop a strategy for assessing unmet need.

Develop a plan to distribute and track broadband services and devices in compliance with program rules.

Identify “Plan B” for funding support in the event unmet need cannot be verified or there are unforeseen program delays.

Prepare a plan and process for submitting reimbursements. This is especially important for devices and services purchased before the FCDL is received, meaning that the 60-day clock for requesting reimbursement is accelerated.

BEFORE YOU BEGIN

REMINDERS

Obtain an FCC Registration Number

Create your ECF Portal Account

Requested Services

- One time and recurring costs and counts
- For equipment FRN's: Type of Product, Make (Manufacturer), and Model
- For services FRN's: Type of Connection, if Firewall is included, and Bandwidth Download and Upload Speeds
- For New Construction, Self-Provisioned Networks, or Datacasting FRN's: Type of Connection, if Firewall is included, Type of Network Equipment, Bandwidth Download and Upload Speeds, Make and Model, as applicable

Vendor Information

- 498 ID/Service Provider Identification Number (SPIN) and service provider name for existing E-rate vendors
- Company name and full address for vendors who do not have a SPIN and are not listed in the ECF Portal.

BEFORE YOU BEGIN

REMINDERS

You **must** certify your ECF FCC Form 471 by the close of the Emergency Connectivity Fund Program application filing window on **August 13, 2021 by 11:59 p.m. ET**. If you certify your form after this date and time, it will be considered out-of-window.

Any ECF FCC Form 471 certified after the close of the window will not be reviewed. For these to be considered by USAC, the applicant must submit to and be granted a **waiver request** by the FCC.

GETTING STARTED

FILING THE ECF FCC FORM 471

USAC offers a training module on filing the ECF FCC Form 471. If you are filing on your own or without assistance from a consultant, this may be very helpful.

E-learning Modules

The following self-paced e-learning modules are designed to help you understand and manage the form filing process, FCC requirements, and other elements of the Emergency Connectivity Fund Program.

Introducing the Emergency Connectivity Fund



Program Overview

5 minutes



FCC Form 471

15 minutes

<https://www.emergencyconnectivityfund.org/training/e-learning-modules/>

<https://www.emergencyconnectivityfund.org/ecf-fcc-form-471/#>

ONCE YOU'VE FILED

ERRORS

If you find that you have made a **data entry** error on your Form 471, you can use the Contact Reviewer button in the ECF Portal to let your reviewer know what happened and provide documentation supporting your request for correction.

You will be notified on your Funding Commitment Decision Letter if the correction was allowable.

APPROVALS

FUNDING COMMITMENT DECISION LETTER (FCDL)

Both the applicant and the service provider will receive an FCDL in the ECF Portal after the review of the funding request(s) included in the ECF FCC Form 471 application. If applicants have questions, they can contact the ECF Customer Service Center or create a customer service case in the ECF Portal.

REIMBURSEMENT PROCESS

FUNDING TIMELINE

FCC Application Approval Targets

50% by September 12

70% by November 21

REIMBURSEMENT PROCESS

SUBMISSION OF REIMBURSEMENT REQUESTS

Applicants **and** service providers may submit requests for reimbursement.

Funds may be sent directly to the service provider where the applicant and service provider have both consented to that approach and the applicant can show that the contractual obligation exists.

Consultants and service providers may assist with the preparation of reimbursement requests to the extent necessary, but any fees associated with such assistance are not eligible for funding under the Program.

REIMBURSEMENT PROCESS

SUBMISSION OF REIMBURSEMENT REQUESTS

Applicants who have contracts or binding agreements to purchase eligible equipment and services from their service provider may submit requests for reimbursement **before** they have paid for the requested equipment and services.

Once funds are received, applicants have **30 days** to certify compliance and provide verification of payment to the service provider.

REIMBURSEMENT PROCESS

SUBMISSION OF REIMBURSEMENT REQUESTS

Participants will also certify that they are seeking funding only for **eligible** equipment and services. In addition, consistent with the asset and service inventories and records retention requirements discussed above, participants will be required to **certify** that they maintain an asset inventory, an inventory of services provided, and data regarding fixed broadband services.

Participants will also be required to certify that they will retain all program records for **10 years** following the last date of service, as well as to their agreement to participate in audits and other post-commitment reviews as may be required.

REIMBURSEMENT PROCESS

SUBMISSION OF REIMBURSEMENT REQUESTS

Service providers are **not required** to submit invoices for payment from the Emergency Connectivity Fund, but may do so if willing.

Applicants and service providers **must** submit, along with their reimbursement requests, invoices detailing the items purchased.

Applicants may submit reimbursement requests and invoices **within 15** days of the first funding wave, and **up to 60 days** from FCDL, revised FCDL, or service delivery date, **whichever is later**.

AUDITS

WHAT TO EXPECT

- Still being developed, but may include audits by the Office of Inspector General
- USAC and Commission staff is directed to work with auditors to accept anonymized or deidentified information in response to requests for information wherever possible. If it is insufficient to ascertain program compliance, auditors may request that consent be obtained to release personally identifiable information.
- Selling, reselling, or transferring equipment funded through the Emergency Connectivity Fund Program in consideration of money for three (3) years after its purchase is **prohibited**.



QUESTIONS & DISCUSSION

HOT TOPICS

THANK YOU



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