



E-Rate Applicants It's Go Time! FY2021-22

Presented by:
Riley Harpole
Christina Bailey
Deborah Sovereign



9/29/2020



Today's Agenda

E-Rate funding & resources

COVID-19 response

EPC updates

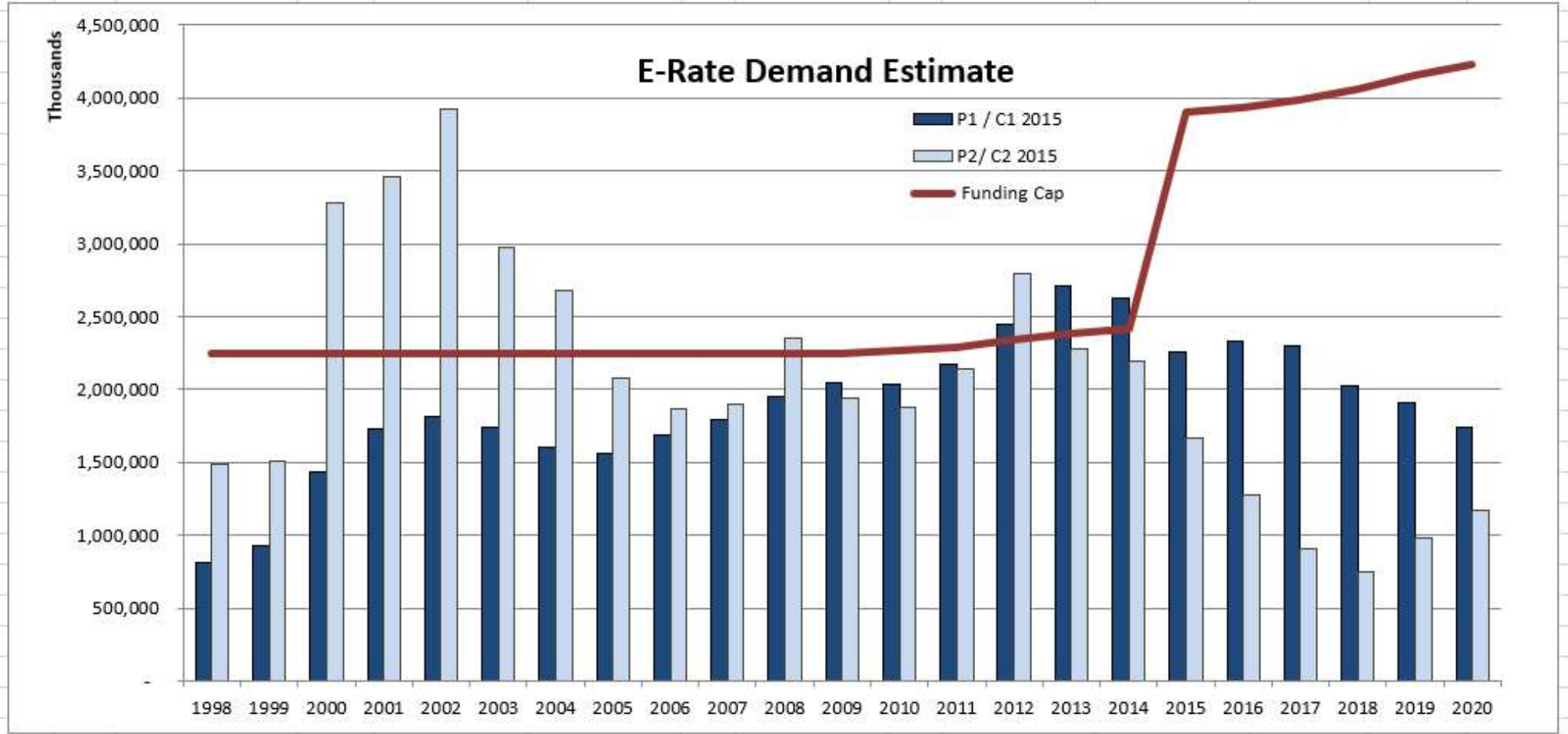
2021-22 E-Rate Process

Compliance

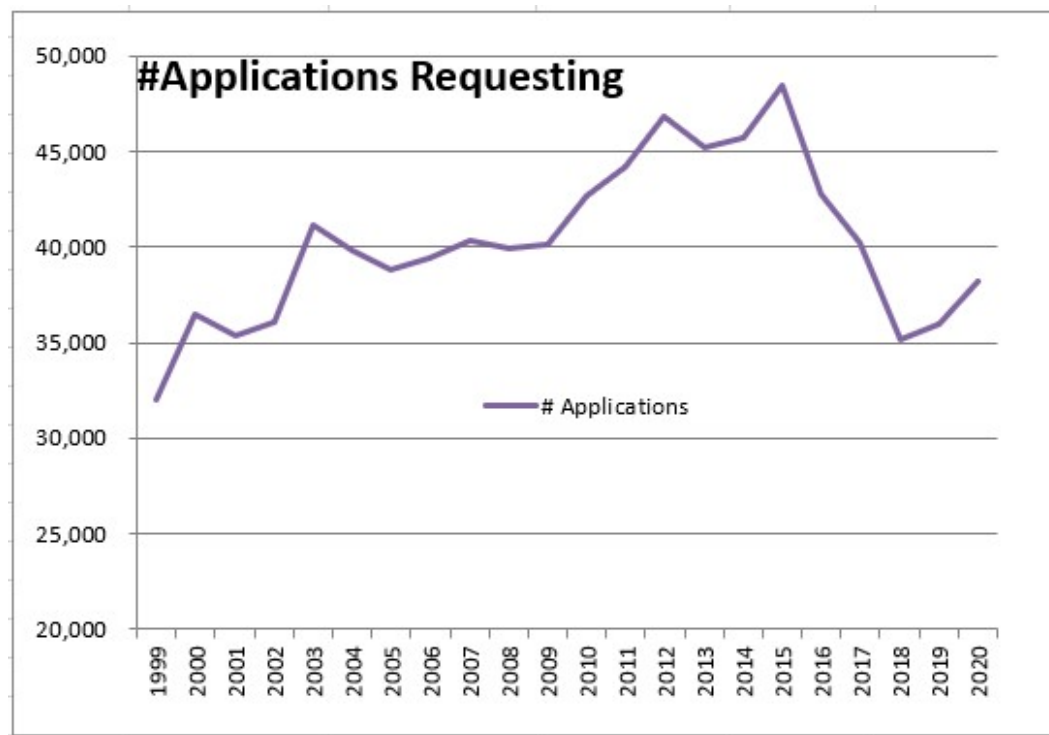
Wrap up and final questions

E-Rate Program Funding

E-Rate Resources



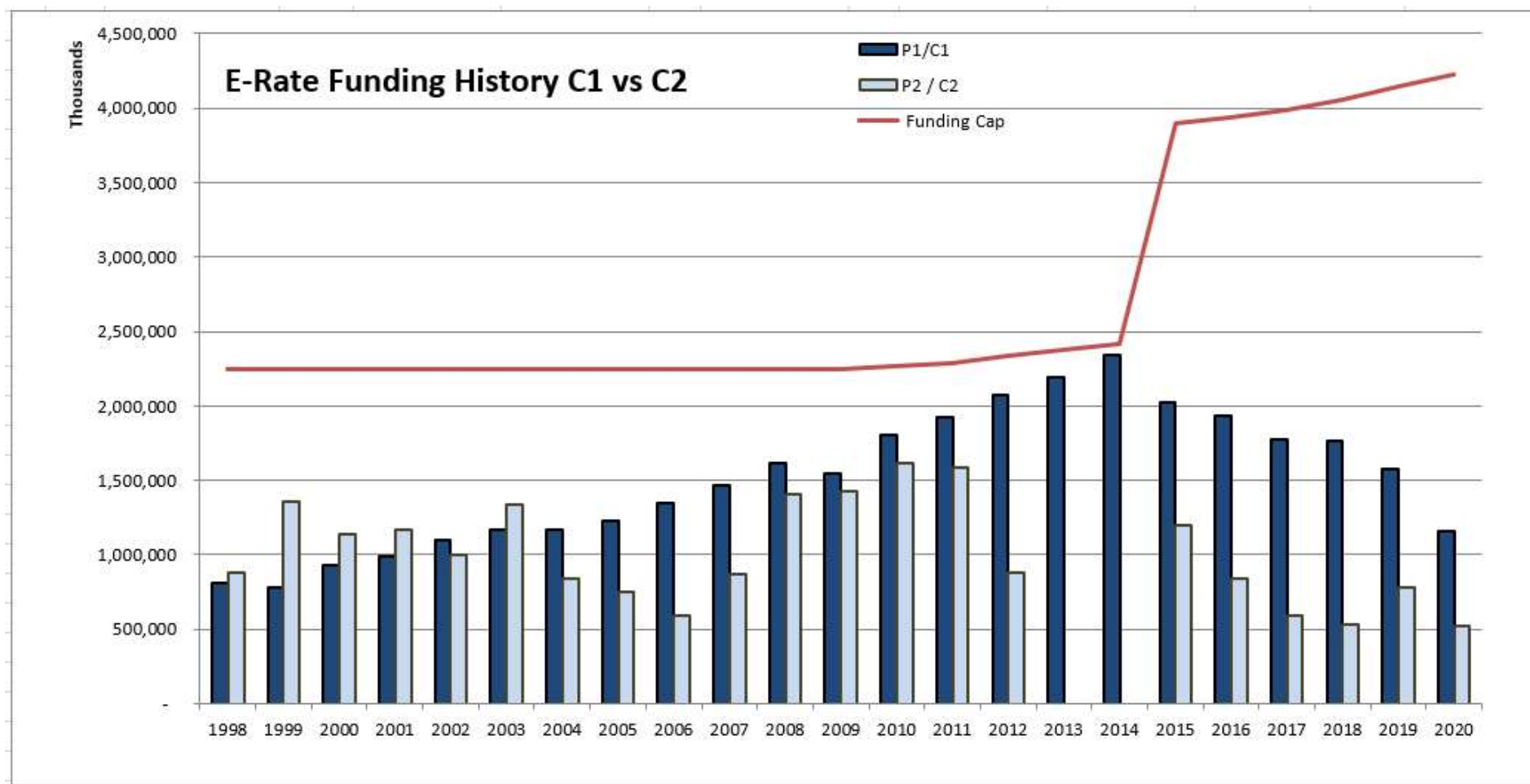
2020: Cap \$4.226 billion; \$2.909 Billion demand

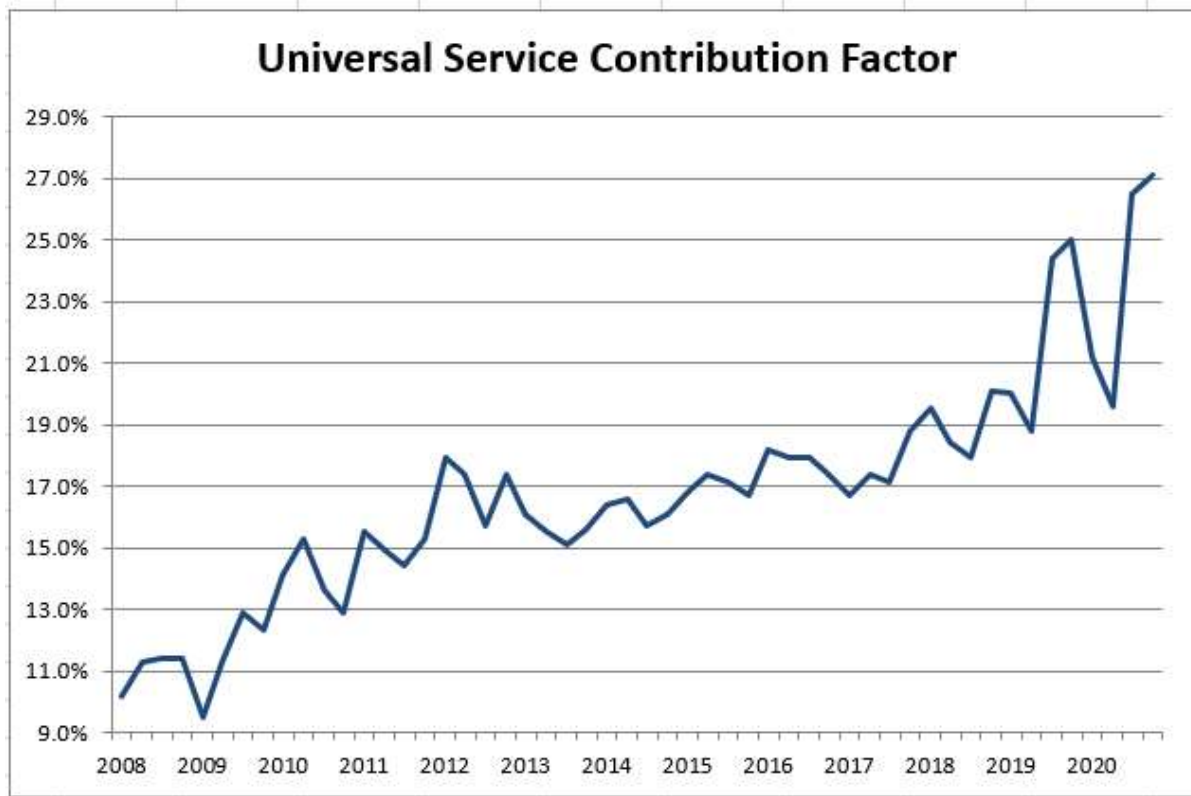


Highest # = 48,404 in 2015
1st year of modernization

Dropped significantly once
applicants had used C2 funding
and no voice services

Number of applications filed
increased slightly in 2020 –
38,207 filed






Contribution Factor hits all time high of 27.7% for 4th Quarter of 2020

- Land Lines & LD ↓
- Information Services not charged
- WAN services – Intrastate vs. Interstate

Resources

- www.kelloggllc.com
- https://www.kelloggllc.com/training_exercises.aspx
- https://www.kelloggllc.com/account_managers.aspx
(look up your Kellogg & Sovereign account manager)
- www.usac.org/e-rate
- <https://www.usac.org/e-rate/applicant-process/before-you-begin/eligible-services-list/>
- <https://www.usac.org/e-rate/resources/news-brief/> (subscribe)
- <https://www.fcc.gov/general/e-rate-schools-libraries-usf-program>



Polling Question – Set 1



COVID-19 FCC ACTIONS

9/29/2020



FCC ORDERS

<https://www.fcc.gov/coronavirus>

Date	Description	Order
3/13/2020	E-Rate Filing Window for FY2020 extended to April 29, 2020	DA-20-273 35 FCC Rcd 2089 (3)
3/18/2020	Gift rules waived through 9/30/2020 – only applies to gifts directly associated with response to COVID 19	DA-20-290 35 FCC Rcd 2741 (4)
3/23/2020	FCC reminder that community use of E-rate supported Wi-fi is permitted during school closures	DA-20-324
4/1/2020	FCC extends key E-Rate program deadlines due to COVID-19 Pandemic	DA-20-364 35 FCC Rcd 2978 (4)

FCC ORDERS

Date	Description	Order
9/3/2020	FCC extends E-Rate and RHC gift rules waiver through December 31, 2020. Also extra 30 days (for E-Rate applicants impacted by the pandemic) to respond to certain information requests submitted through December 31, 2020.	DA-20-1021
9/16/2020	FCC Opens Second E-Rate Application Window for Funding Year 2020 - Notice	DA-20-1091

Of special note:

Service Delivery Deadlines extended from 9/30/2020 to 9/30/2021 - ALL EXTENDED
However, applicant will need to submit Form 500 to extend contract expiration date

Oklahoma Corporation Commission

COVID-19 OUSF Emergency Response Process

Upon request from a beneficiary, OUSF Service Providers should immediately submit the form provided in the link below to request immediate approval of bandwidth increases for eligible entities. Submissions beyond 24 hours of the increase could result in approval delays.

- Must be directly related to COVID-19 needed bandwidth
- Must prove need for the upgrade
- Support extended through June 30, 2021

http://www.occeweb.com/pu/OUSF/OUSF_COVID19.htm

2nd Filing Window Open for 2020-21

- July 1, 2020-June 30, 2021
- Application Window closes October 16, 2020
- Internet and WAN bandwidth upgrades needed as a result of the COVID-19 pandemic
- No competitive bidding required IF
- Filed a Form 471 for FY2020 that was funded or pending funding
- Price per megabit (or gigabit) for the new request must not exceed that of original service



Oklahoma Corp Commission has also extended
emergency B/W support through 6/30/2021

Details on 2nd filing window

- Can Libraries apply?
 - No
- Can we request Category 2 equipment?
 - No
- Do we have to file a new Form 470 for FY2020?
 - No - If you previously certified an FCC Form 470 for the services you are requesting, you can cite that FCC Form 470 application number on the FCC Form 471 you certify during the second window.
 - Yes if your state and local procurement rules require competitive bidding

Details on 2nd filing window

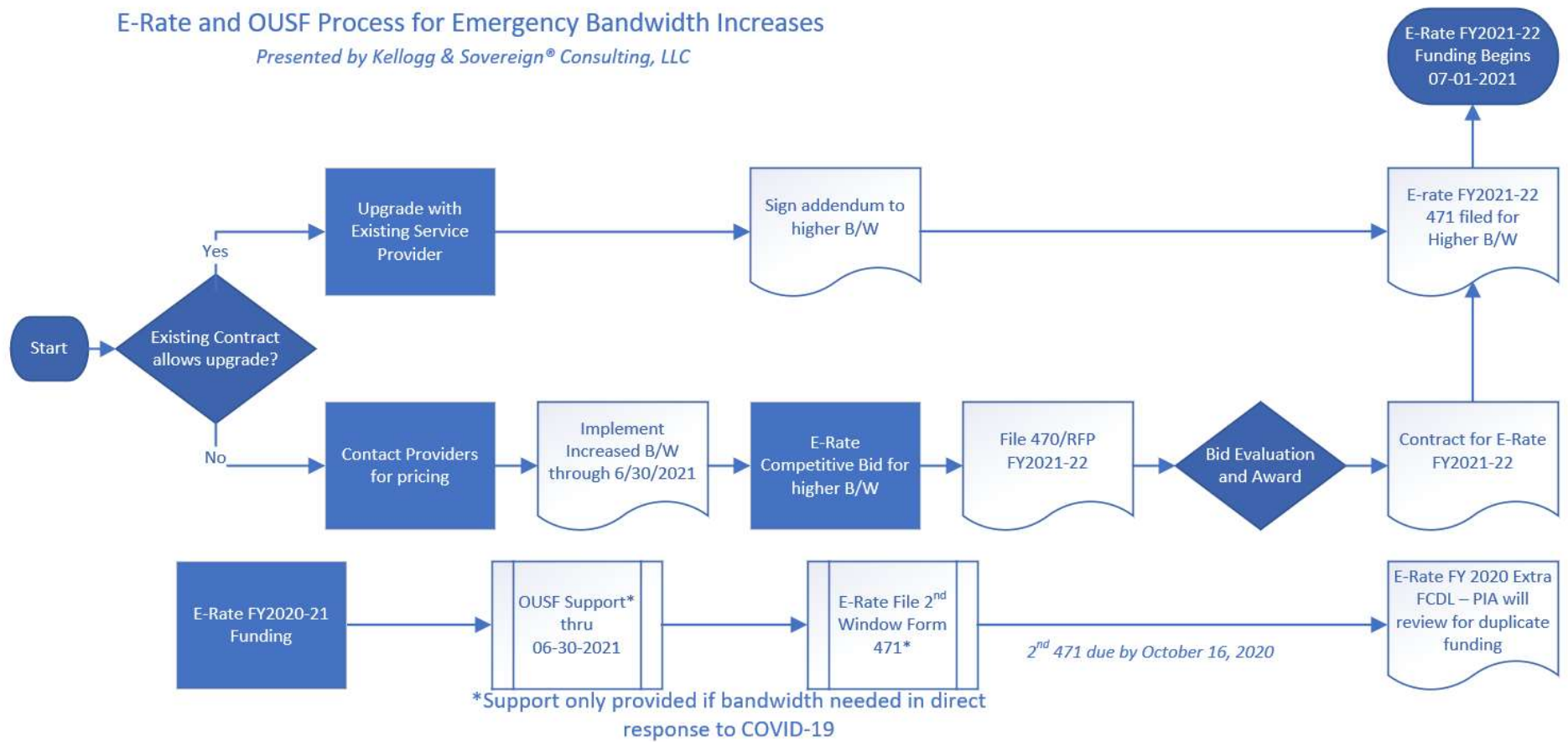
- Do we need to sign a new contract for the upgraded bandwidth?
 - Amendment to your existing contract if bandwidth was previously bid
 - New contract if bandwidth is new offering or new service provider
 - Month to month is allowed
 - *Note: KSLLC will upload your new contract or amendment in EPC for the 2nd filing*

Details on 2nd filing window

- Information required on the COVID-19 FY2020 Form 471
 - FY2020 Form 471 and FRN that previously relied on the Form 470
 - **Statement confirming that the requested E-Rate discounts are for additional bandwidth needed as a result of the COVID-19 pandemic**
 - Price per megabit of original and new bandwidth request
 - USAC – whether or not this is a bandwidth upgrade to existing circuit or installing a brand new circuit

E-Rate and OUSF Process for Emergency Bandwidth Increases

Presented by Kellogg & Sovereign® Consulting, LLC



Example

- ABC School district currently has 100 Mbps service with their current provider, Tech Savvy Inc. Cost is \$600/month (\$6.00 per Mbps)
- ABC School district filed a FY2020 Form 471 and referenced their 2018 Form 470. USAC approved their funding and issued FCDL.
- In direct response to the COVID-19 pandemic, ABC School district needs to upgrade to 1 Gbps immediately.
- ABC school district contacts Tech Savvy for pricing.
- Tech Savvy can provide 1 Gbps at a monthly cost of \$2400/month (\$2.40 per Mbps)
- ABC School district signs a 36-month contract with Tech Savvy for the 1 Gbps service

Example

- ABC School district is eligible for the FY2020 2nd window filing COVID-19
- Their cost per Mbps for the 1 Gbps service (\$2.40) is less than the original cost per Mbps (\$6.00)
- They filed a Form 471 in FY2020 and had an approved FCDL
- They signed a new contract for the 1 Gbps service so will need to upload the new contract in EPC
- USAC PIA will reduce # months of service in the original request through the cut over date of the upgrade to 1Gbps. No duplicate funding.
- ABC school district will need to competitively bid the 1 Gbps bandwidth for FY2021 and can consider the existing contract as a standing bid.

EPC Updates

E-Rate Productivity Center

Update Users – Manage Users / Organizations

- Remove users at your district who are no longer there
- ADD users at your district who should have access – need at least one more person with access
- Remove consulting firms or other organizations you are no longer working with
- ADD or Remove KSLLC users – ask your account manager
- Remove portal@kelloggllc.com



Ask your KSLLC account manager for assistance!

Multi-Factor Authorization (MFA)

- **Login NOW and update your email**
- Forgot your password or update MFA
 - <https://player.vimeo.com/video/372673005>
- Administrator updates – contact USAC 1-888-203-8100

EPC Training – Videos are Best Method to learn

- EPC Videos
- <https://www.usac.org/e-rate/learn/videos/>
- User Guides
- <https://www.usac.org/e-rate/trainings/online-training/training-series-for-applicants/>



KSLLC E-Rate Process for FY2021-22

KSLLC Timeline



E-Rate Form 470 and RFP

Competitive Bidding

Competitive Bidding Roles

KSLLC

- Reminders to keep you on track
- Prepare and File Form 470
- RFP Prep
- Manage Competitive Bidding
- Post answers to bidder's questions
- Prepare and post addenda
- Download bids and prep bid packet
- Review returned bid packet
- Ensure contracts signed and correct information and dates provided
- Prepare and File Form 471

Applicant

- ✓ Complete Needs Assessment
- ✓ Post newspaper notices
- ✓ Host bidders conference (online)
- ✓ Answer Questions TIMELY
- ✓ Follow local procurement
- ✓ Review 470/RFP / Certify
- ✓ Review Bid Packet and complete bid evaluation
- ✓ Sign and negotiate contracts
- ✓ Review 471/ Certify

Group Schedules

<https://www.kelloggllc.com/docs/training/RFPGroupsFY2021.pdf>

Group 4

September '20						
Su	M	Tu	W	Th	F	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30			

October '20						
Su	M	Tu	W	Th	F	Sa
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

November '20						
Su	M	Tu	W	Th	F	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

December '20						
Su	M	Tu	W	Th	F	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

Group 4

Questionnaire Done	9/29/2020
Post By:	10/5/2020
Q&A Due:	10/16/2020
Bids Due:	11/17/2020
Bid Decisions:	12/1/2020

Group 5

October '20						
Su	M	Tu	W	Th	F	Sa
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31

November '20						
Su	M	Tu	W	Th	F	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

December '20						
Su	M	Tu	W	Th	F	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

January '21						
Su	M	Tu	W	Th	F	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

Group 5

Questionnaire Done	10/6/2020
Post By:	10/12/2020
Q&A Due:	10/23/2020
Bids Due:	11/24/2020
Bid Decisions:	12/8/2020

Group 6

October '20						
Su	M	Tu	W	Th	F	Sa
				1	2	3
4	5	6	7	8	9	10
11	12	13	14	15	16	17
18	19	20	21	22	23	24
25	26	27	28	29	30	31


November '20						
Su	M	Tu	W	Th	F	Sa
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30					

December '20						
Su	M	Tu	W	Th	F	Sa
		1	2	3	4	5
6	7	8	9	10	11	12
13	14	15	16	17	18	19
20	21	22	23	24	25	26
27	28	29	30	31		

January '21						
Su	M	Tu	W	Th	F	Sa
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30
31						

Group 6

Questionnaire Done	10/13/2020
Post By:	10/19/2020
Q&A Due:	10/30/2020
Bids Due:	12/1/2020
Bid Decisions:	12/15/2020



Polling Question – Set 2





NEEDS ASSESSMENT E-Rate FY2021-22

Pre-Filled Needs Assessment

Step 1 – Review Existing C1 Services

- Internet Access
- Wide Area Network
- Check your contract expiration dates
- Check prior years to determine if can upgrade within your existing contract

Step 2 – Sign Multi Year renewal form

- Required to memorialize your decision to voluntarily renew in writing

Step 3 – Provide additional details

Pre-Filled Needs Assessment

Step 4 – Review the Site List tab

- School or library sites
- Non-Instructional Facilities
- Be sure to provide us with any changes that have occurred this year plus any new changes that will happen by 9/30/2022 (if known)

Step 5 – Category 2

- Overview tab lists your budget (see row 28)
- Provide specifics (will ask for “OR EQUIVALENT”)
- May list General quantities / types PLUS bidders’ conference
- Provide floor plans and pictures during bidders’ conference

Pre-Filled Needs Assessment

Step 6

- Return to your account manager

470 & RFP

- KSLLC will prepare your Form 470 and RFP
- Ignore 470 tasks while we are working on it
- CERTIFY your Form 470 when we notify you to do so

ESL HIGHLIGHTS

Eligibility, Firewalls, UPS Eligibility
C1 vs C2 for connections

Draft FY2021 Eligible Services List

No E-Rate Support

- Huawei Technologies
 - ZTE Corporation

Other Changes

- ESL Comments were due 9/4/2020
 - Expect no major changes

<https://docs.fcc.gov/public/attachments/DA-20-767A1.pdf>

Educational Purpose

- Activities related to education that occur on school property
- Activities related to providing library services to individuals that occur on library property

**Activities that are not on school or library property
are generally NOT eligible for discounts**

Off-site Internet is NOT eligible for E-Rate discount

Category One Notes

CATEGORY ONE

- Leased Lit Fiber
- Leased Dark Fiber
- Transport
- Internet
- Self Provisioned
- Third Party Networks
- On premise equipment

Most Cost-Effective Solution

- Applicants need to request leased lit and transport options – technology neutral
- Do NOT need to request self-provisioned or dark fiber solutions
- Do Select most cost-effective solution with price of E-Rate eligible products and services as the primary factor

Difference between C1 and C2 connections



CATEGORY 1 – if connections are between or among more than one school or library site (as defined by the state)



CATEGORY 2 – if connections are between buildings that are associated with the same school or library site



High School to Ag Building
Elem School to 4th Grade Portable

Special Issues

- **Firewalls** – no change in the ESL. However, USAC has reduced cost-effectiveness reviews. Provide in your bids reasoning to support a robust firewall. Technical explanation with diagrams is very helpful. Be sure to cost –allocate ineligible portion
- **UPS Equipment** – USAC will need to know what equipment will be plugged into the UPS equipment. Applicant may be determining this but provide details if you know.
- **Data connections and Internet – triple check addresses.** Notify KSLLC immediately if an address is wrong – this is a cardinal change and the applicant may need to repost/extend the RFP.

Category Two Notes

CATEGORY TWO

- Cost allocation is required
- Service provider's responsibility
- Look up product eligibility
- RFP – applicant reserves the right to purchase some all or none of the products or services
- Category 2 Budget cap – be prepared to reduce or pay 100%
- Service Substitutions are available if needed after funding
- Do your best to determine needs, host bidders' conference if need consultative sell
- Remain vendor neutral

MIBS and BMIC

MIBS

- Managed Internal Broadband Service
- Manage E-Rate eligible equipment
- Applicant owned OR
- Service provider owned

Operating licenses required to operate E-Rate eligible equipment are Internal Connections

BMIC

- Maintenance of E-Rate eligible equipment
- Break – Fix
- Manufacturer warranties
- Software downloads and fixes





Conduct a Successful Virtual Bidder's Conference

Bid Evaluation

Bid Evaluation – Best Practices

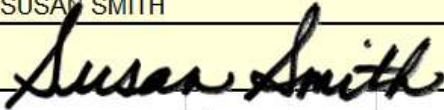
COMPARE APPLES TO APPLES

- Internet Bandwidth
- WAN Bandwidth
- Contract Terms
- C2 equipment
- C2 maintenance
- Proper E-Rate Cost allocation

PROPERLY SCORE EACH FACTOR

- Price-Erate goods and services
- Price – Other Costs
- Prior Experience
- Personnel Qualifications
- Responsiveness
- Technical Merit

EVALUATION GRID (EXCEL VERSION)

KELLOGG & SOVEREIGN SCHOOL DISTRICT							
SUSAN SMITH				Title:	TECHNOLOGY DIRECTOR		
				Date:	12/1/2020		
Internet Access - 1 Gbps (36 mo. term)							
	E-Rate Eligible Costs	Other Costs - Not Eligible	Price-Erate	Price-Other Costs*	Prior Experience	Personnel Qualifications	Responsiveness
Price for Each Bid			30.000	5.000	20.000	10.000	15.000
	54,000.00	-	30.000	0.000	0.000	10.000	15.000
	79,950.00	-	20.263	2.000	10.000	10.000	15.000
	73,000.00	-	22.192	2.000	5.000	10.000	15.000
	82,000.00	-	19.756	2.000	20.000	10.000	15.000

Bid Evaluation Matrix - Example

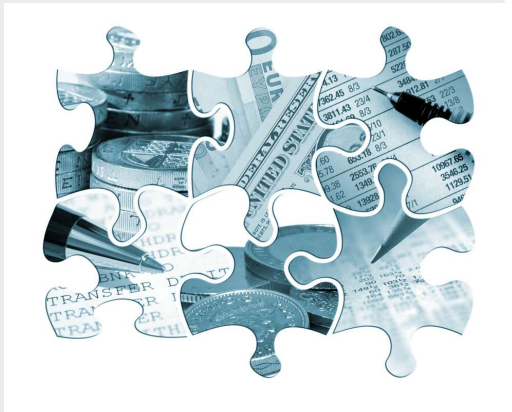
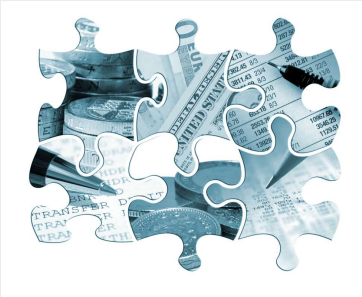
CIPA COMPLIANCE

SCHOOLS, LIBRARIES, CONSORTIA

Children's Internet Protection Act

<https://www.kelloggllc.com/cipa.aspx>

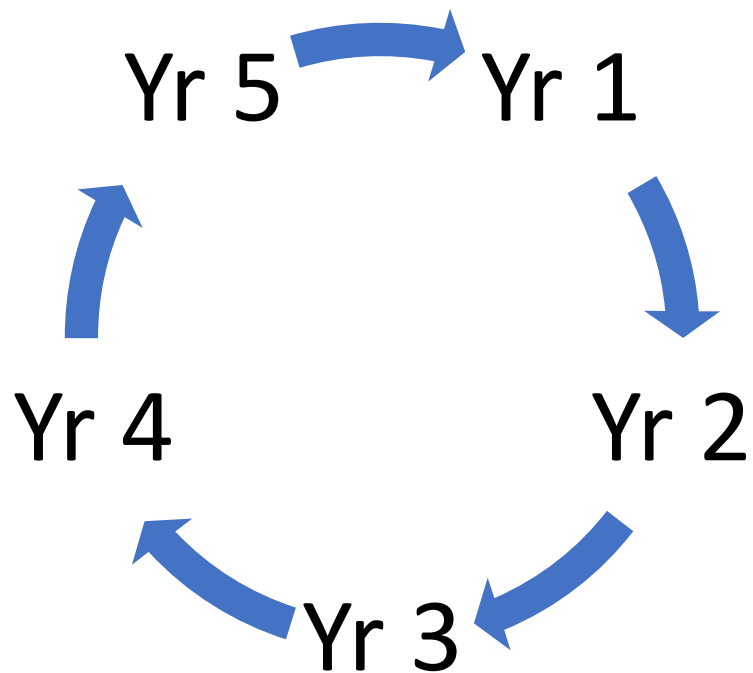
Requirement	Audit Documentation
Technology Protection Measure	Description Screen shot of blocked site or log
Internet Safety Policy	Policy online or printed version
Public Notice and Hearing	Board agenda and minutes when last approved
Educating Minors about appropriate online behavior	Description of education provided



Category 2

- Five Year Budgets & Planning

Discussion Topic



How are you managing your five-year rolling budget for category 2?

Applicant Wide Budget

School District-Wide

- Calculated at a district level based off enrollment.
- Can be used where the applicant decides.

Library System-Wide

- Calculated at a library system level based off square feet.

Calculating your C2 Budget FY2021

Library System

\$4.50/ square foot

Budget floor of \$25,000

No disparity between urban and rural libraries

Report square footage once each 5-year budget cycle

Budget is Library System-Wide

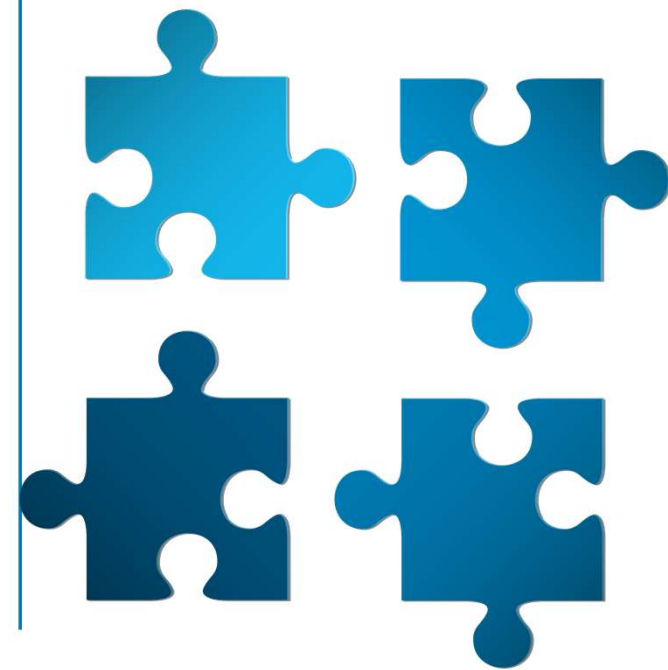
School District

\$167/student

Budget floor of \$25,000

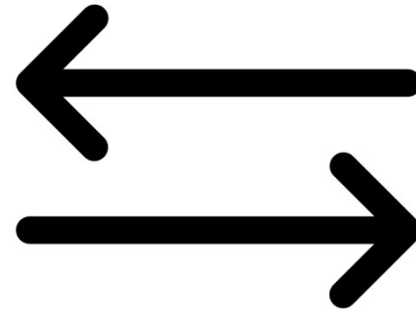
Report full-time enrollment once each 5-year cycle for budget purposes.

Budget is District-Wide



Transfer of Equipment

- Equipment funded and purchased in FY 2021
- Install at one location and move to another
- Will not affect budget
- Do not need to notify USAC



Non-Instructional Facilities

- No change in C2 Eligibility
- Not eligible if equipment will only be used by this site
- Eligible if NIF is used as a HUB
- Best to put funds into individual school or library sites.

Calculating your Budget

10 sites or less

- Calculate each site's budget separately.
- Ensure budget floor is included in each site.
- Add all sites together for district budget.

11 site or more

- Total Enrollment X \$167
- Total Square Feet X \$4.50
- Compare to aggregate funding floor of \$25,000 per site.

Budget Example

5 School Sites

	Enrollment	Per student	Total	Total with minimum
School 1	250	\$ 167	\$ 41,750	\$ 41,750
School 2	175	\$ 167	\$ 29,225	\$ 29,225
School 3	200	\$ 167	\$ 33,400	\$ 33,400
School 4	35	\$ 167	\$ 5,845	\$ 25,000
School 5	96	\$ 167	\$ 16,032	\$ 25,000
			\$ 126,252	\$ 154,375

35 School Sites with 5,000 students

		Factor	Total
Standard	5,000	\$ 167	\$ 835,000
Aggregate Floor	35 Sites	\$ 25,000	\$ 870,000

Contracts and Board Approvals

Presented by Debi Sovereign

Contracts & Online Signatures

- CAREFULLY review all contracts
- Contingent on E-Rate funding
- Reserve right to accept some, all, or none
- End on June 30
- Voluntary annual renewal
- Sign Online: Adobe or DocuSign
- Contract will be sent to you and provider for signature
- Check your spam folder so you don't miss it
- Review and Sign immediately!

Board Approvals

- Annual E-Rate Funding Approvals (check your local board requirements)
 - Delegation of signatory power to someone other than the Superintendent
 - Contract Approval
 - Board resolution to pay non-discount share


E-Rate Form 471

Applying for Discounts

E-Rate Application – FCC Form 471

- ✓ Review your entities (school sites, NIF's, library locations)
- ✓ Check YOUR contact information
- ✓ Review supporting documentation
- ✓ Confirm contract dates
- ✓ Confirm amounts
- ✓ If in doubt, call it out!

Certify in 3 days



Polling Question – Set 3

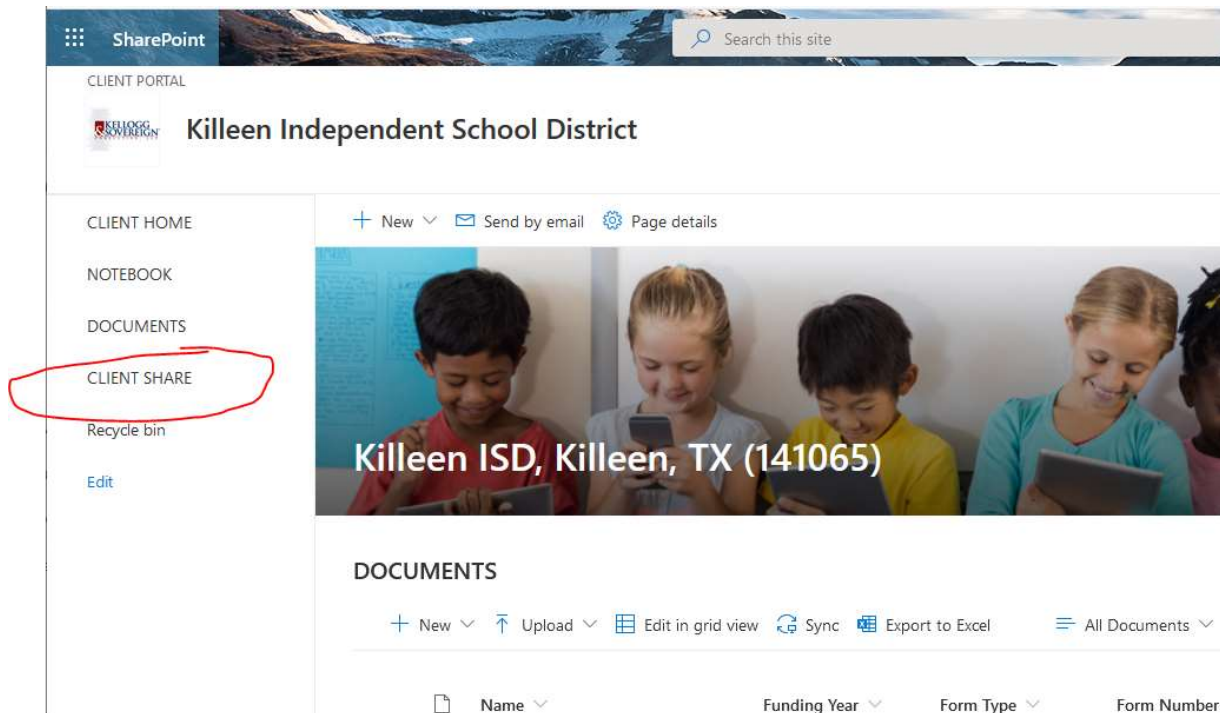


Funding & Disbursements



Form 486 and Funding Acceptance

- After USAC reviews the application,
- Funding Commitment Decision Letter (FCDL) issued
 - Sent by email and notice in EPC
- Form 486 – Notifies USAC of applicant's decision to accept the funding and certify compliance with the Children's Internet Protection Act (CIPA)
 - <https://www.kelloggllc.com/cipa.aspx>
- *Kellogg & Sovereign will file the Form 486 on your behalf*



- Upload all bills
- View your E-Rate Documentation
- Secure
- 10 year documentation retention requirement

Sharepoint
Use your E-Rate Portal!

Disbursements - BEAR or SPI

BEAR - REIMBURSEMENT

- Upload monthly to Sharepoint
- KSLLC will file for reimbursement on your behalf
- Payments will be issued by EFT

SPI - DISCOUNT ON YOUR BILL

- Upload all E-Rate invoices to Sharepoint
- C1
- C2

USAC Reviews PIA, PQA Compliance

Presented by Debi Sovereign

USAC Compliance

PIA REVIEW

- Confirm Entities
- Confirm Dates
- Cut over issues
- C2 Budget reductions

PQA & ONSITE AUDITS

Desk audit of a single FRN

- Invoice, proof of payment
- Bids, Bid Evaluation, Contracts
- CIPA compliance
- Products and services as funded
- Recipients of Service
- Inventory – installed & operating
- On site visual review

Final Questions & Wrap Up

dsovereign@kelloggllc.com

rharpole@kelloggllc.com

cbailey@kelloggllc.com



Thank you for Attending

580.332.1444

www.kelloggllc.com

erate@kelloggllc.com