

**CYBERSECURITY PILOT** October 2026 update

# USAC Cybersecurity Pilot Program: what participants need to know now

Annual reporting is coming, payment rules have changed, and appeal windows are short. Here's USAC's October 26, 2026, update.

By Kellogg & Sovereign Consulting



Now that USAC has issued all Funding Commitment Decision Letters (FCDLs) for the Schools and Libraries Cybersecurity Pilot Program, participants are heading into their initial annual reporting cycle. USAC's latest update also covers new payment requirements, a new sign-in portal, how to return funds, and the deadlines for appeals and waivers. Here's what schools and libraries in the Pilot should know, and what to do next.

## Your 3 action items

**1**

### [Register for the webinar](#)

Tuesday, November 17, 2026, at 3 p.m. ET: USAC's walkthrough of the new annual report form.

**2**

### [Work out your report deadline](#)

Find the date of your **first** FCDL. Your due date is based on it.

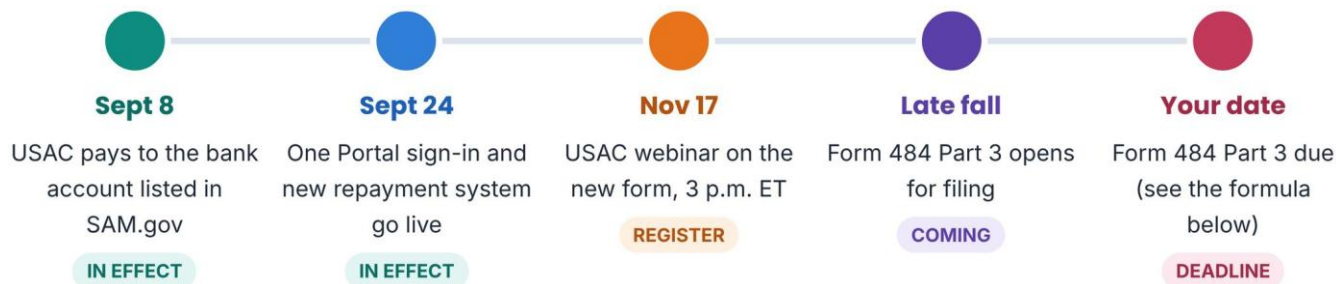
**3**

### [Check your SAM.gov account](#)

Make sure it is active and linked to a valid bank account, or payments will stop.



## Key dates at a glance



TOP PRIORITY

## Annual report: Pilot FCC Form 484 Part 3

All Cybersecurity Pilot Program participants are required to submit an annual report using Pilot FCC Form 484 Part 3. The FCC will use this information to evaluate whether, and to what extent, Universal Service Fund support should be used to address the cybersecurity needs of schools and libraries.

Parts 1 and 2 of FCC Form 484 established the initial reporting baseline. Part 3 provides the annual update and collects additional information about participants' cybersecurity experiences.

Each participant's reporting deadline is based on the date of its first Funding Commitment Decision Letter (FCDL), plus one year and 60 days.

### What it asks

- Questions similar to Parts 1 and 2
- Your cybersecurity expertise
- Cybersecurity incidents during the reporting period
- A chance to update your Parts 1 and 2 answers and add new data

### When it's available

USAC will release the form **later this fall**.  
Deadlines differ from one participant to another, so don't rely on anyone else's date.

### How to find your due date

Date of your first  
FCDL

+

1 year

+

60 days

=

Your report due date

**Example:** if your first FCDL is dated March 1, 2026, add one year (March 1, 2027) and then 60 days. Your report is due April 30, 2027.



**Free USAC webinar: Tuesday, November 17, 2026, 3 p.m. ET.** It covers an overview and walkthrough of Form 484 Part 3, with live Q&A. You need to register, and the recording and slides will be posted on USAC's Pilot Program Webinars page.



IN EFFECT SINCE SEPTEMBER 8, 2026

## Getting paid: the SAM.gov requirement

USAC now sends Universal Service Fund reimbursements to the **bank account in your SAM.gov registration**. This applies to E-Rate and Pilot participants paid through the BEAR (Billed Entity Applicant Reimbursement) method, and to service providers using SPI (Service Provider Invoice) invoicing. To get paid, you need all three:



### A UEI on your FCC Form 498

Your Unique Entity Identifier from SAM.gov



### An active SAM.gov registration

Renewed every year



### A valid bank account

Linked to your SAM.gov account



**Don't let it lapse.** If your SAM.gov registration becomes inactive, you can't receive Universal Service Fund payments. Put the yearly renewal date on your calendar.

Participants and service providers should verify that their SAM.gov registration remains active and that their banking information is current. Payments may be held until applicable registration, and UEI requirements are satisfied.



SINCE SEPTEMBER 24, 2026

### One Portal: one sign-in

Clicking the blue **Sign In** button on [usac.org](https://usac.org) now takes you to the One Portal dashboard. Your login stays the same. From there you can open the E-Rate Productivity Center (EPC), the Cybersecurity Pilot Program Portal and other USAC systems.



NEW TOOL

### Funding request status tool

USAC's new Cybersecurity Pilot Program FRN Status Tool lets you view and export data for each Funding Request Number (FRN): participant, service provider, status, deadlines, commitments and authorized payments.



GOOD TO KNOW

## Returning Pilot Program funds

If USAC determines that funding was committed or disbursed in error, it may adjust the funding commitment and recover amounts that were improperly disbursed. USAC calls this a **COMAD** (Commitment Adjustment). Since September 24, 2026, all repayments go through the new **Program Recovery Payments** system in One Portal.

### If USAC sends you a COMAD letter

- 1** You and your service provider each get a letter with a funding commitment report.
- 2** Pay back any amount owed through Program Recovery Payments in One Portal.

### If you want to return funds voluntarily

- 1** Email the Voluntary Return Request Form to [PIDVoluntaryReturns@usac.org](mailto:PIDVoluntaryReturns@usac.org).
- 2** USAC emails you within 7–10 calendar days to say you can pay.
- 3** Pay within **60 days** of the Invoice Statement date in that email.



Missing the 60-day window puts your account on USAC's "Red Light" status.



WATCH THE CLOCK

## Appeals and waiver requests



You have **30 days from the date of USAC's decision** to file a Pilot Program appeal or waiver request (47 C.F.R. § 54.2012). That's **shorter than the E-Rate deadline**, so don't assume the E-Rate timeline applies.

### Appeals: USAC first, then the FCC

1. USAC issues a decision
2. Appeal to USAC in the Cybersecurity Pilot Program Portal
3. If needed, appeal USAC's decision to the FCC

### Waivers: the FCC only

USAC can't waive FCC rules, so waiver requests go straight to the FCC.

- File in the FCC's Electronic Comment Filing System (ECFS)
- Use **WC Docket No. 23-234**
- Pilot Form 484 contains confidential information. File it confidentially through the FCC Secretary's Office (47 C.F.R. §§ 0.457–0.459).

## Need help with the Pilot Program?



**Kellogg & Sovereign Consulting** can help you work out your Form 484 Part 3 deadline, prepare your annual report, check your SAM.gov setup, and respond to COMADs and appeals before the 30-day window closes.

**Contact us:** <https://kelloggllc.com/contact/>

USAC's Customer Service Center is also available at **(888) 203-8100**, Monday–Friday, 8 a.m.–8 p.m. ET, or through a customer service case in the Cybersecurity Pilot Program Portal.

