

E-RATE UPDATE

Recent changes to the E-Rate
And what's coming next



- ▶ Filing Window
- ▶ EPC MFA
- ▶ C2 for 2021-2022 and beyond
- ▶ Eligible Services
- ▶ Deadline Extensions
- ▶ Other Changes
- ▶ Emergency Broadband Benefit (EBB)
- ▶ On the Horizon

AGENDA



- ▶ Admin window closes: January 13 at 11:59 pm
- ▶ Filing window opens: January 15 at noon
- ▶ Last day to file Form 470: February 25
- ▶ Filing window closes: March 25 at 11:59 pm

FILING WINDOW DATES



- ▶ The “E-Rate Productivity Center” (EPC) has multi-factor authentication (MFA) since July 27
 - ▶ When you log in, an email is sent with a passcode, which you then have to enter in order to complete the log-in process
 - ▶ Repeated failures to log in will result in a lockout

EPC MFA



- ▶ New budget of \$167 per full-time student for schools
- ▶ Budgets will be organization-wide
 - ▶ Budget can be spent on one school or spread across schools
 - ▶ “applicants should consider all schools that fall under the control of a central administrative agency as a district for the purpose of calculating a shared, district-wide budget.”
- ▶ Funding floor increased from \$9,200 to \$25,000 per site
 - ▶ Can only be used by applicants with less than 10 sites
- ▶ Part-time rules: schools serving only part-time students can count them, but districts with part-time programs should count each student only once
- ▶ Budget tool: <https://opendata.usac.org/E-rate/E-rate-C2-Budget-Tool-FY2021-/8z69-hkn7>

C2: FY 2021-2022 AND BEYOND BUDGET CALCULATION



- ▶ The first budget cycle will be FY 2021-2022 to FY 2025-2026, at which point everyone's budget will reset
 - ▶ No more sliding windows
- ▶ Five-year budget known at start of cycle
 - ▶ Per-student rate stays constant over five-year cycle
 - ▶ Student count and per student rate constant over five-year cycle
 - ▶ Student count can be increased if necessary

C2: FY 2021-2022 AND BEYOND BUDGET CYCLE



- ▶ Equipment transfer within a district allowed any time
 - ▶ No need to notify USAC
- ▶ Inventory must be tracked for 10 years
 - ▶ Must track equipment location
- ▶ Non-instructional facilities (NIFs) still not eligible for C2
 - ▶ If C2 equipment is shared across the district (e.g., the district firewall), some portion should be cost-allocated out for NIFs

C2: FY 2021-2022 AND BEYOND INVENTORY, ELIGIBILITY AND NIFS



- ▶ <https://docs.fcc.gov/public/attachments/DA-20-1418A1.pdf>
- ▶ Two minor changes
 - ▶ No equipment from “a company that the FCC has designated as a national security threat” (currently Huawei and ZTE)
 - ▶ Clarifying that budgets are now district-wide (or library system-wide)

ELIGIBLE SERVICES FOR 2021



- ▶ Non-recurring (C2) services for FY 2019: service delivery deadline extended to September 2021
- ▶ Special construction: extended one year
- ▶ Invoice deadline extended 120 days
 - ▶ plus 30 days on request
- ▶ Form 486 deadline extended 120 days

DEADLINE EXTENSIONS



- ▶ Gift rules waived thru June 30, 2021
 - ▶ Applicants can accept free equipment/services from service providers
- ▶ National security: no Huawei or ZTE products through E-Rate
- ▶ Up-front charges for C1 no longer need to be amortized
- ▶ Invoicing deadlines for appeals clarified
 - ▶ Applicants can file invoices up to 120 days after Revised FCDL
- ▶ Applicants may share self-provisioned networks with ineligible entities, but must cost-allocate

OTHER CHANGES



- ▶ Part of recent COVID relief bill
- ▶ Not part of the E-Rate, but maybe of use to school districts
 - ▶ Similar to Lifeline program
- ▶ Rules finalized by March 1st?
 - ▶ Currently accepting comments
- ▶ Subsidy for Internet access costs for low-income households
 - ▶ \$50 / month for cost of Internet service
 - ▶ \$100 one time for Internet device

EMERGENCY BROADBAND BENEFIT (EBB)



- ▶ Home Internet access?
 - ▶ Chairman Pai says it's not allowed; he leaves this month
 - ▶ Applicants, service providers and Democrats in Congress are in favor
- ▶ Changes to the Form 470 drop-down menus; delayed until FY 2022
- ▶ Debarment changes
- ▶ Network security products eligible?
- ▶ Changes to cost allocation of C2 for NIFs?
- ▶ Contribution methodology

ON THE HORIZON



- ▶ Check your entity's enrollment, NSLP numbers

DO NOW



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QUESTIONS

