# **Important Information**



• Funds For Learning uses its best efforts to ensure that all of the E-rate-related information that it provides is accurate, current, and complete as of the date of original presentation. However, because of the dynamic nature of E-rate program rules, regulations, and procedures, FFL can neither warrant nor guarantee the accuracy, currency, or completeness of this information.

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## Preparing for Funding Year 2018

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# Agenda



- Introduction and program updates
- Eligible services and discounts overview
- Form 470 and E-rate procurement
- Preparing for the Form 471 application

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# Oklahoma: Funding Year 2017



- \$50.3M in discounts requested on \$69.6M of services
  - > Category One:
    - Pre-Discount/Requested/Committed: \$57M, \$41.2M, \$23.3M
  - > Category Two:
    - Pre-Discount/Requested/Committed: \$12.7M, \$9M, \$3.7M
- Smallest applicant: Elgin Community Library (\$432.00)
- Largest applicant: Oklahoma City Public Schools (\$3.7M)

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## E-rate Program Update



- FY2018: very similar to FY2017
  - > Voice service: discount -80%
- E-rate is **not** "going away!"
  - > FCC Chair (and others) critical of program administration
  - > USAC contractor Solix contract expires at the end of the year
  - > Funds 'stored' in US Treasury instead of third party institutions
- Remember upcoming invoice deadline! (10/28 FY2016 recurring)

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# **FY2018 Forecasting and Trends**



- No dates yet; USAC estimate January to March
  - > "Profile window" could be November-December
- FY2017 trend: faster commitments
  - > Less review during PIA, more review during invoicing
- "Problems" taking longer than usual to resolve
  - > File carefully to reduce instances of RAL corrections, 500s, subs, etc.

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#### How to succeed



- Make a plan
  - > Who is responsible? Where does information live? What happens when you are not available? What is your timeline?
- · Document, document, document
  - > Think about what documentation you can retain to support any data point or program rule. Make sure documentation is dated!
  - > Document retention requirement: 10 years from last date of service

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Funding Application Steps

Update
Profile
Est. December

Form 470
Now - Est. Feb.

Form 471
Est. Jan-Mar

# **Eligible Services Overview**



# **Eligible Services List**



- Defines what products and services qualify for discounts
  - > Focused on broadband connectivity and infrastructure
  - > Eligibility defined by **functionality**
- FY 2018 list not finalized
  - > Comment period has ended
- Not listed in the ESL? Assume it is not eligible

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# Connectivity and Infrastructure



- Category One connections:
  - > Connections to public Internet
  - > Connections between separate schools (and/or NIFs)
- Category Two connections:
  - > Connections inside a specific building (LAN)
  - > Connections between multiple buildings of one school
  - > Connections between multiple schools in one building (also C1\*)

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# **Service Categories**



- Two funding categories:
  - > Category 1 ("C1"): service to the building
    - Telecommunications and Internet access
  - > Category 2 ("C2"): service within the building
    - Internal connections, managed internal broadband and basic maintenance

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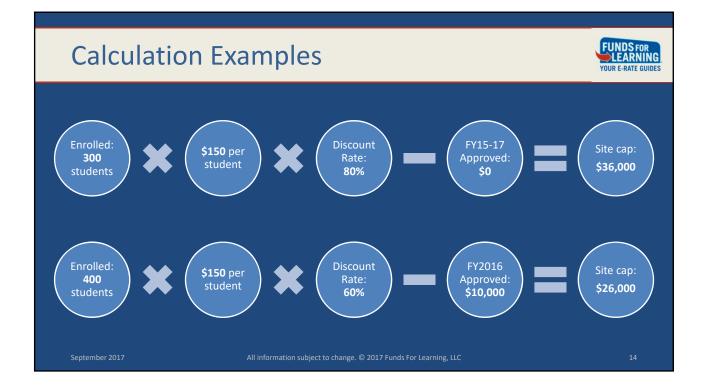
# Category Two "Budgets"



- Per-site funding cap
- Cumulative running total over five years
  - > Clock starts per-site from first year request is submitted
- Calculated annually based on enrollment
  - > Can adjust up or down
- \$150/student for schools; \$2.30 or \$5.00 /ft² for libraries
  - > Funding caps adjusted for inflation (153.47 / 2.35 / 5.12 in FY2017)

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## Have you used your budget?



- Five-year clock starts with first Funding Year C2 is committed
  - > According to USAC, clock starts for all sites simultaneously
- After FY2019, "two in five" rule goes back into effect
  - > FCC could make other arrangements
- Don't know your usage? help@fundsforlearning.com

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# Action Item: Planning



- 1. Review current services and contracts
  - > What services will continue?
- 2. Estimate Category Two budgets per site
- 3. Tech forecasting
  - > What services / projects are needed July 2018 June 2019?

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# Applying for E-rate Discounts



# Step 1: Updating Your Profile



- "Administrative window"
  - > Eliminates need for secondary consortia and library window
- Profile includes:
  - > Site demographics
  - > Discount calculation information

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#### **Profile: Best Practices**



- Start by making your own site list:
  - > Site/school name
  - > Physical address
  - > Phone and e-mail (can be the same for all sites)
  - > NCES code and state site ID (if helpful)
  - > Enrollment and NSLP counts at each site
- Don't forget non-instructional facilities (NIFs)
  - > Bus barns, maintenance buildings, admin buildings, etc

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#### Site Addresses



- USAC reviews addresses very closely
- Any address which may be on a bill/invoice should be in profile
- Use "annexes" for secondary buildings with separate address

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# **EPC Applicant Profile**



- All sites are identified by Billed Entity Numbers (BENs)
- Application is filed using "parent" BEN
  - > Each recipient of service (site) has a "child" BEN
- Adding or removing BENs requires service call to USAC
  - > Use EPC "Customer Service" feature or call 888-203-8100

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2:

#### **Review Profile**



- Review all sites currently in profile ("Manage Organization")
  - > Note old/closed BENs that should be removed
  - > Note new BENs that need to be created
  - > Ensure that demographic and enrollment/NSLP data is accurate
- Make note of required changes...
  - > Profile data may be overwritten

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## **EPC: "Manage Connectivity Questions"**



- Information requested on a per-site basis
- Info carries over—check accuracy (and add info for new sites)
- Data required:
  - > Download and upload speed (Internet or WAN)
  - > Predominant connection type (MC)
  - > How sufficient is the quality of the Wi-Fi at this location? (MC)
  - What is the biggest barrier to having a robust internal network in your classrooms at this location (MC, with "other" option)

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# **Calculating Discount Rates**



# Calculating the E-rate Discount



- Discount rate calculated based on:
  - > District-wide NSLP eligibility; and
  - > Urban or rural location defined by US Census data
- All district sites receive same discount rate

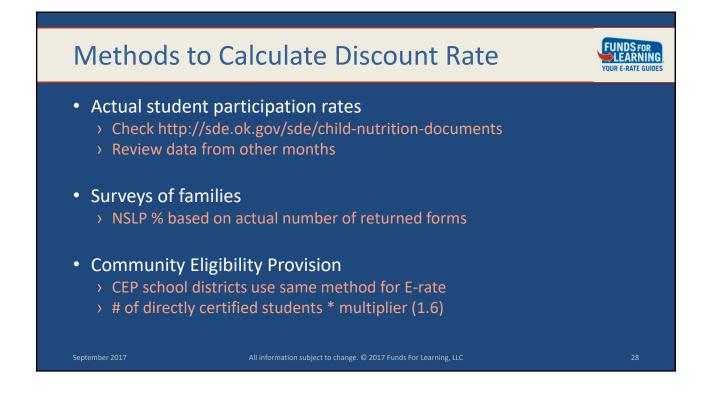
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#### **E-rate Discount Matrix Category One Category Two** Percent of **Students Eligible Discount Rate Discount Rate** for NSLP Urban Rural Urban Rural 20% 25% Less than 1% 20% 25% 1% - 19% 40% 50% 40% 50% 20% - 34% 50% 60% 50% 60% 35% - 49% 60% 70% 60% 70% 50% - 74% 80% 80% 80% 80% 75% - 100% 90% 90% 85% 85%

| Sample Discount Calculation  FUNDS FOR SOURCE - RATE GUIDES                      |                                    |           |                    |                               |    |
|--|------------------------------------|-----------|--------------------|-------------------------------|----|
|  | Ford Indep. School Dist 1          | Enrollmer | nt                 | NSLP                          |    |
|  | Fiesta Elementary                  | 300       |                    | 250                           |    |
|  | Focus Elementary                   | 300       |                    | 200                           |    |
|  | Mustang Middle School              | 500       |                    | 190                           |    |
|  | Taurus High School                 | 500       |                    | 160                           |    |
|  | Total                              | 1,600     |                    | 800                           |    |
|  | E-rate Discount Rate = <b>80</b> % |           | <u>300</u><br>,600 | = <b>50%</b><br>NSLP Eligible |    |
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#### Action Item: Review Profile



#### 1. Create internal site list:

- > School name, BEN, address, enrollment, NSLP
- > Estimate discount rate and C2 caps for budgeting purposes

#### 2. Review data in EPC

- Note changes that will be required (but don't update yet!)
- > Watch news feeds for "all clear" to begin updating data

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#### **E-rate Procurement**



#### Oklahoma Forms 470



- FY2017: 1,096 Forms 470 filed in total
  - > 904 referenced Category One services
  - > 344 referenced Category Two services
- FY2018: Five 470s filed so far
  - > All Category One
  - > First Form: St. Joseph Catholic School, Muskogee
- Last date to post not yet, plan for earlier deadline in 2018

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## **Procurement Process Summary**



- All E-rate discounted services must be competitively bid:
  - > Exemption for "low cost" Internet: 100/10 speed @ \$3,600/yr or less
- Evaluate bids received
- Sign contracts and service agreements

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#### FCC Form 470



- Posted on USAC's website
  - > Describes products and services requested
  - > Includes attachments (RFPs) and other information
  - > Includes contact information
- Filed at any time during the year (subject to EPC)

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#### FCC Form 470



- Bidding period is 28 days from the date the Form 470 is filed
  - > "Allowable Contract Date" marks end of 28 day period
  - > RFP should also be open for 28 concurrent days
- Document retention
  - > Keep copies of all bids received (even losing bids)
  - > Keep records of communication(s) with bona fide respondents

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#### Form 470 Scope



- The 470 sets the overall scope of a funded project
- <some scope>
  - > Competitively bid via Form 470
  - > Contracted
  - > Requested via Form 471
  - > Purchased
  - > Discounted with E-rate funds
- Deviations from original scope can cause denial

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# Form 470 Step 1: Line Items



#### **Category One Category Two** Transport Only - No ISP Service Included Antennas, Connectors, and Related Components Cellular Data Plan/Air Card Service Cabling Cellular Voice Caching Leased Dark Fiber and Leased Lit Fiber\* Firewall Service and Components **Internet Access & Transport Bundled** Racks Internet Access: ISP Service Only Router Lit Fiber Service **Switches** Other (requires RFP) **UPS/Battery Backup** Self-provisioned Networks and Services Provided Over Third Party Networks\* WAP Voice Service (Analog, Digital, Interconnected VOIP, etc) Wireless Controller

## Form 470 Step 2: Service Descriptions



- · Line item selections are not enough
- Describe needs:
  - > In detail
  - > Without too much detail
- Remember that 470s aren't binding
  - > You are not obligated to purchase all (or any) services on the Form

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# Form 470 Step 2: Service Descriptions



- E-rate no longer requires technology plans; but:
  - > Consider expected growth over life of contract (and funding year)
- Dictate how you want pricing broken out on bids
  - > Binary disqualification factors? List them!
- Consider potential questions from service providers

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#### A word about RFPs



- RFPs are not an E-rate requirement, but may be required by state/local rules
- An RFP does not have to be long or complicated
  - > Think of an RFP as an "attachment" to the Form 470
- Be very careful about addendums!

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# **Competitive Bidding Conduct**



- · Applicants expected to treat all vendors equally
  - > Bid requests may not be vendor-specific
  - > No inside information or special advantages
- "Fair and open" competitive bid process
  - > Vendors should not assist with Form 470 or RFP preparation
  - > Vendors should not assist with vendor selection
  - > No gifts including meals!

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# **Evaluating bids**



- Cost of eligible services must be the highest weighted factor
- Two ways of evaluating bids:
  - > "Binary" disqualification criteria (must be disclosed)
  - > Subjective criteria (evaluated on a "matrix")
- Memorialize the selection in writing:
  - > Scoring worksheets, committee meeting notes, etc use dated docs
- Know and follow state and local bid evaluation rules!

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# Sample Vendor Evaluation Matrix



| Criteria                                   | Available Points    |  |  |
|--|---------------------|--|--|
| Cost of eligible goods and/or services     | 30                  |  |  |
| Cost of ineligible portion                 | 25                  |  |  |
| Prior experience with vendor               | 15                  |  |  |
| In-state preference                        | 10                  |  |  |
| Compatibility with existing infrastructure | 20                  |  |  |
|  | 100 possible points |  |  |

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#### **Contracts**



- Legally binding agreement required
  - > After 28-day period but prior to funding request (Form 471)
  - > Should include extension/renewal terms
  - > Exception: Month-to-month and tariff services
- Should contain detailed scope of work
  - > Service parameters, equipment make, model and quantity
  - > Billing terms, service logs, etc.
- May be contingent upon funding commitment

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#### **Contracts**



- You can use OMES contracts
  - > File Form 470 and consider state contract terms/pricing as "bid"
- E-rate allows contracts with voluntary extensions
  - > Contracts must have a final end date after extensions are used

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## **EPC: Entering Contracts**



- · Enter nickname and contract number
- Upload copy (Y/N)
- State contract? Multiple award schedule? (Y/N)
- "Piggy backing?" (Y/N)
- Number of bids received (required)
- Associated Form 470 (FY2016-17 or prior year)
- Account number

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#### **EPC: Entering Contracts**



- Contract vendor (identified by SPIN)
- · Contract award date
- Voluntary extensions? (Y/N)
  - > If yes: number of extensions, expiration date if all are exercised
- Pricing confidentiality (Y/N)

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# Filing Funding Applications



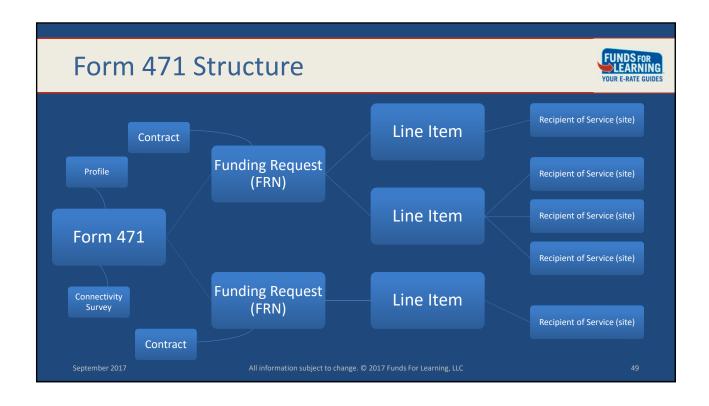
#### FCC Form 471

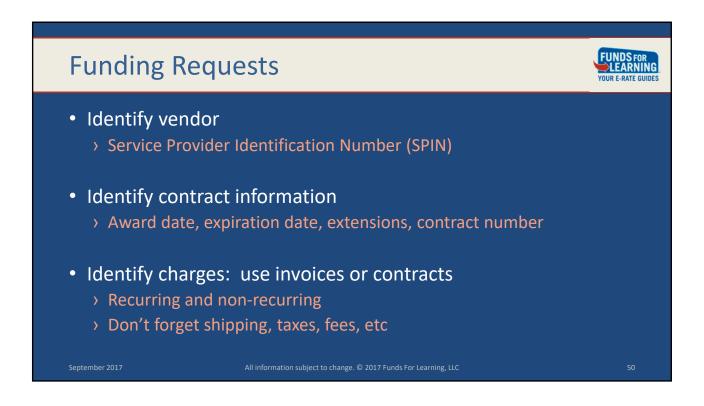


- Each 471 application will have one or more FRNs
  - > Funding Request Number
- An FRN may be associated with a contract
- Each FRN will have one or more line items
  - > Formerly: "Item 21"
- Each line item will be associated with one or more sites

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## **Funding Request Strategies**



- Category One and Category Two applications are separate
- Category One: most services district-wide
- Category Two: consider where equipment will be installed

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E1

## Let's talk about line items...



- Mirror line items as closely as possible to quotes or bills
  - > Watch C2 documentation closely!
- Forms 500, service substitutions require line item data
  - > "Allocated" dollars per site per line item
- Prediction: BEARs/SPIs will eventually require line item data

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# Creating an FCC Form 471



- EPC Form creation wizard
  - > Sites and discount rate will pull from "Manage Organization" (Profile)
  - > Connectivity questions will pull in from "Manage Connectivity ?s"
  - > Select contracts from Contracts section when creating FRNs
  - > Enter line item:
    - Pick function/type
    - Recurring/non-recurring costs
    - Sites receiving services

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# Support for Oklahoma Schools erate@openrange.ok.gov help@fundsforlearning.com

405-471-0912



# Preparing for Funding Year 2018

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