

**Info2Go!**

**Emergency Connectivity Fund (ECF)**

**Mobile Hotspots & Devices**

**for Public Libraries**

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Slides by Laurie Germann, Ohio State E-rate Coordinator

# What is the Emergency Connectivity Fund (ECF)

## A New Fund to Support Remote Learning

- Congress passed the American Rescue Plan on 3/11/2021
- Provides \$7.171 billion for emergency off-campus connectivity
  - Pays for Internet connections and tablets/laptops
  - Will be a reimbursement to both schools **and** libraries
- The FCC was given 60 days to enact the regulations for how the program will work
- Funds fall under the federal E-Rate program – if you qualify to apply for E-Rate, you qualify for ECF
- A 45-day application window expect to open in late June
  - First window is for “**proactive**” requests purchases between July 1, 2021 – June 30, 2022

# The Big Picture

## The Good

- 100% discounts
- Familiar process—forms are similar to E-rate
- No Form 470 bidding process
- After the pandemic emergency ends, the library can use ECF funded equipment for educational purposes the library considers appropriate

## The Not-So-Good

- Requirements that may infringe upon patron privacy
  - Patron statement of need
  - Inventory with borrower's full name
- Retaining records for 10 years after end of program
- Short window to prepare and file
- Funding for ongoing costs only covered through June 30, 2022

# Fund Differences

## School and Library Programs:

- **E-Rate**
  - A discount program covering 20%-90% of Category 1 costs
    - Provides Internet and Wi-Fi on campus/library sites
- **ECF**
  - Provides 100% of cost
    - Off-campus/off-premise Internet and connected devices for students and library patrons

## Consumer Program:

- **The Emergency Broadband Benefit (EBB)**
  - Discounted service for low-income households
    - Provides Internet and connected device for the home
    - Household must apply – school or library cannot apply on their behalf but are encouraged to assist them.

## **Eligible Services/Locations:**

- Anywhere remote access is needed
  - Home, community center, homeless shelter, etc.
- Includes school buses and bookmobiles
  - This is outside of the hotspots used to conduct library business currently funded by E-Rate
- Network buildout if no commercial service offered
  - Applicant must document need

## **Ineligible Services/Equipment:**

- Fixed connections to library location
  - If eligible for E-Rate, it's not eligible for ECF
- Buildout where commercial service is available

# Eligible ECF Broadband Services

## Broadband Services:

- 1 hotspot/user; 1 fixed connection/home
- Monthly recurring service costs
- No minimum standards for speeds/service

## Equipment:

- Wi-Fi hotspots
  - \$250 cap per Wi-Fi hotspot
- Modem/routers
- Laptops/tablets up to \$400
  - One device per user allowed
  - No allowance for breakage or spares
  - No smartphones or desktops

## Initial Filing Window:

- 45-day application submission window
- Estimated to open in late June
- For purchases made 7/1/2021 – 6/30/2022

## Additional Filing Window:

- A second window will be provided if funds remain
- FCC has freedom to set window type
  - Additional window for new purchases **or**
  - Retroactive purchases (**March 1, 2020** – June 30, 2021)
- Process will continue until ECF depleted

## Utilize the E-Rate System:

- Administered by USAC
- Where possible will use E-Rate portal/forms
  - Form 471, BEAR (will be tweaked for ECF)
  - New certifications will be added
  - Will be asked how need was determined
- No E-Rate bidding requirements
  - **NO** Form 470
  - Must follow any state/local procurement rules



## Funding Decisions:

- No decisions until filing window closes
- Goal of 50% of workable applications funded within 60 days, 70% within 100 days

## Funding Priority:

- Applications funded in order of priority based on:
  - Location (rural or urban)
- Highest E-Rate discount rate funded first
- Rural schools/libraries funded before urban
  - Rural locations will receive a 5% “bump” in priority
- Some applicants may not receive support

# Funding Process

## Funding Priority and Rural 5% Bump:

	Emergency Connectivity Fund Prioritization Matrix	
	Discount Level	
% of students eligible for National School Lunch Program	Urban	Rural
< 1.....	⑫ 20	⑪ 30
1-19.....	⑩ 40	⑨ 55
20-34.....	⑧ 50	⑦ 65
35-49.....	⑥ 60	⑤ 75
50-74.....	④ 80	③ 85
75-100.....	② 90	① 95

To see where you fall, check your current Discount Rate in EPC (E-rate Productivity Center) or contact William or Dylan

# Reimbursement Process

## BEAR Method:

- Traditional – 100% reimbursement after purchase of eligible service/equipment
  - May purchase prior to ECF funding decision – but it’s a gamble!
- **“Pre-reimbursement”** – reimbursement prior to service or equipment purchase
  - Helpful so you’re not carrying project cost
  - Requires waiting on ECF funding decision
  - Will be required to show purchasing decision/contract
  - Must send funds on to provider within 30 days

## SPI Method:

- Service provider files for reimbursement
  - You will need to indicate on Form 471 your preference, **and**
  - Show service provider’s willingness to filing the SPI
  - Service providers are not required to agree

# Reimbursement Process

- Deadline to file a BEAR for reimbursement will be **60 days** from purchase.
- Detailed invoice required
- Must register in SAM.gov for payments
  - System for Award Management (SAM) is a web-based application
  - Many of our schools and libraries have already registers. To search, go to: <https://sam.gov/SAM/pages/public/searchRecords/search.jsf>
  - May search by your DUN's number
  - Registration process requires 3 “steps”
    - Step 1 - Establish a username and password with Login.gov
    - Step 2 - Create a User Account for SAM.gov
    - Step 3 - Create the organization's registration

# CIPA Requirements

- CIPA applies to the use of **any** computer **owned by a school or library** receiving ECF or E-Rate.
  - If you send a computer home with a student/library patron, it must be filter if receiving ECF or E-Rate
- CIPA does **not** apply if the school/library does not receive ECF or E-Rate funding for internet service (only devices)
- CIPA does **not** apply if the computer **is owned by the student or library patron**, even if the library supplies a mobile hotspot and receives ECF or E-Rate.
  - However, Idaho State Code still applies for wireless provided by public libraries

## Inventory for Equipment Provided to Individuals:

- For equipment provided to an individual library patron (such as a hotspot or laptop lending program), the inventory must include:
  - Device or equipment type (i.e. laptop, tablet, mobile hotspot, modem, router)
  - Device or equipment make/model
  - Device or equipment serial number
  - Full name of the person to whom the device or other piece of equipment was provided
  - Dates the device or equipment was loaned out and returned to the library, or the date the library was notified that the device or equipment was missing, lost, or damaged.

## Audits:

- The FCC or USAC may ask for patron information for compliance purposes. Auditors will attempt to work with anonymized or deidentified information whenever possible.
- If more specific information is required, the library would have to obtain consent from the patron before sharing personally identifiable information.

## Other Rules:

- ECF subject to the 10-year document retention (same as E-Rate)
- Must certify non-duplicative services (no double dipping)
- Gift rule exception for items providing remote learning
  - Example – free hotspot
- Deadline to file appeal is 30 days from denial

## Moving Forward:

- Updates will be provided as information is received
- 1-on-1 consulting throughout the ECF application process is available from ICfL

# ECF Other Ineligible Items

## Examples of ineligible costs include:

- Administrative costs, e.g., personnel expenses, consultant fees, etc.
- Software, user licenses, filtering and firewall services **that are purchased separately and are not included in the base price for the equipment.**
- Back-up power equipment, e.g., back-up batteries, redundant power cords, UPS, etc.
- Cybersecurity tools (including, virtual private network (VPN) licenses, firewall software, network monitoring, and filtering services).
- Eligible equipment or services purchased before March 1, 2020 (**if funding is available for retroactive purchases**).
- Headsets.
- Separate costs for non-connected accessories, e.g., mouse pads, laptop bags, charging stations, etc.
- Standalone microphones.
- Standalone cameras.
- Technical support, maintenance costs, separate costs for warranties and protection plans.
- Video conferencing equipment and related software subscriptions (e.g., Zoom subscriptions).



## Next Steps

- Determine needs and be prepared to explain how need was determined; don't apply for what you don't need
- If you aren't already participating in E-rate, get registered with USAC for an EPC (E-rate Productivity Center) account for your library
  - Call USAC Customer Service at 888-203-8100
  - Get an FCC Registration Number, if you don't already have one
- If you don't already have one, get a DUNS number for your library
- If you haven't already done so, get your library registered with SAM.gov – the whole process can take up to 20 days
  - 3-step process: 1-username for Login.gov, 2-user account for SAM.gov, 3-create organization registration in SAM.gov
- Be prepared to provide patrons with an eligible use policy explaining that ECF equipment or service is intended only for patrons who do not have internet access sufficient to meet their needs
  - The Order requires patrons to sign a statement to this effect
- Determine how you will retain all records for 10 years

# For ECF & E-rate Support

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## Resources

- USAC Emergency Connectivity Fund Program Website & Trainings
  - <https://www.emergencyconnectivityfund.org/>
- ICfL's E-rate and Broadband Webpage & Email List
  - <https://libraries.idaho.gov/grants-funding/e-rate-broadband/>
- ALA's Emergency Connectivity Fund - Information for Libraries
  - <http://www.ala.org/advocacy/ECF>
  - Includes comprehensive guides for common library uses of ECF
- Funds for Learning's ECF Resources
  - <https://www.fundsforlearning.com/ecf/>