

See questions 6.7, 6.8, and 6.9 for updated information on using NLSP counts to estimate unmet needs.

Emergency Connectivity Fund Frequently Asked Questions

New or updated questions are marked with an asterisk () before the question.*

Eligible Entities

1.1 Q: If my school or library is eligible for E-Rate support, is it eligible for the ECF program?

A: Yes.

1.2 Q: Are private schools eligible?

A: Yes, private schools are eligible if they meet the definition of elementary or secondary schools as defined in the Elementary and Secondary Education Act (20 U.S.C. § 7801(19) and (45)), are non-profit, and do not have an endowment exceeding \$50 million.

1.3 Q: Are Tribal libraries eligible?

A: Yes. Tribal libraries are eligible for support from the ECF program. Tribal libraries may demonstrate their eligibility by providing (1) documentation from an authorizing Tribal government entity (such as a charter or ordinance or letter from the Tribal Council), (2) documentation from an authorizing entity that shows that the applicant has characteristics of a library, including regular hours, staff, and materials, or (3) a signed letter from a state library agency.

1.4 Q: Is a college library (e.g., a Tribal college library) eligible?

A: No. A library's eligibility depends on its funding as an independent entity. Only libraries whose budgets are completely separate from any schools (including, but not limited to, elementary and secondary schools, colleges, and universities) are eligible.

***1.5 Q: Do I need a SAM.gov account if I am an annual E-Rate applicant?**

A: SAM.gov registration is necessary for all applicants and service providers that are submitting requests for reimbursement (FCC Forms 472/474) and receiving funds from the U.S. government. Because this is not currently required to participate in the E-Rate program, applicants, who are planning to submit requests for reimbursement (FCC Form 472) and have not registered before should begin the process now. Service providers that agree to invoice on behalf of applicants also need to be registered with SAM.gov. ECF applicants whose service providers will file invoices for ECF reimbursement on their behalf (SPI invoicing) are not required to register in SAM.gov.

1.6 Q: Do you need to participate in E-Rate to participate in the ECF Program?

A: No, you do not need to be a current (or future) E-rate participant to be eligible for the ECF Program.

Eligible Equipment and Services

2.1 Q: Will the ECF Program support installation and configuration performed by a third-party vendor that is different from the vendor that sold the equipment to the applicant?

A: No. Installation and configuration costs will only be eligible for ECF support if they are provided by the same vendor that is providing the eligible equipment.

2.2 Q: Do eligible connected devices need to be capable of connecting to a cellular service (LTE or 5G)?

A: No. While laptop computers and tablet computers must be capable of connecting to broadband internet in order to be eligible for funding as a connected device, they do not need to be capable of connecting via a cellular service. We expect the connected devices to be Wi-Fi enabled and able to support video conferencing platforms and other software necessary to ensure full participation in remote learning.

2.3 Q: Are Chromebooks and iPads eligible as connected devices?

A: Yes. Applicants may request ECF support for Chromebooks, iPads and other laptops or tablets. We expect these devices to be Wi-Fi enabled and able to support video conferencing platforms and other software necessary to ensure full participation in remote learning. Chromebooks may be requested under the laptop equipment category.

2.4 Q: Is a license to use a connected device eligible for ECF support?

A: Licenses included in the base price of the connected devices are eligible for support and do not require cost allocation, but separately priced licenses are ineligible for ECF funding.

2.5 Q: For the initial application filing window, do the eligible equipment and services need to be purchased and received after July 1, 2021?

A: Equipment and services can be ordered before July 1, 2021, but they cannot be received, delivered, or paid for before July 1, 2021. Note: There is an exception for monthly services that were prepaid prior to the adoption of the ECF Order (see below).

2.6 Q: For the initial application filing window, are monthly services that were prepaid prior to the adoption of the ECF Order eligible, such as when an applicant prepaid for a multiyear contract last year?

A: Applicants may seek reimbursement for services delivered between July 1, 2021 and June 30, 2022 that were prepaid prior to the ECF Order adoption on May 10, 2021, if they can demonstrate that the services were purchased to meet unmet student, school staff, or library patron needs. Such applicants may not seek reimbursement until after the services have been delivered. Prepaid equipment is ineligible for ECF support during the first application filing window, which is limited to equipment and services received, delivered, and paid for between July 1, 2021 and June 30, 2022.

***2.7 Q: Can applicants pay upfront and seek support for multiyear contracts (e.g. the 2021-22 and 2022-23 school years) in the first application window?**

A: No. Applicants may only seek support for the monthly costs of services delivered between July 1, 2021 and June 30, 2022. Similarly, a school cannot seek funding for multiple years of an equipment lease in the first filing window. Approved applicants may not seek reimbursement until after the services have been delivered.

2.8 Q: We bought Wi-Fi hotspots last year. Can we request ECF support for the monthly service costs?

A: Yes, monthly service costs for services delivered between July 1, 2021 and June 30, 2022 are eligible, but the cost of the Wi-Fi hotspots themselves is not if they were received prior to July 1, 2021.

2.9 Q: Can applicants lease connected devices?

A: Yes, connected devices may be leased, but the cost of the leased devices must be reasonable. USAC will carefully review requests for leased devices to ensure the costs are reasonable compared to the \$400 limit for purchasing a connected device.

2.10 Q: Commercially available fixed or mobile broadband internet access services are eligible for ECF support. Does that mean that the services purchased must also be available to the general public?

A: No. To be eligible for ECF support, commercially available broadband services must be available for purchase, but they do not have to be available to the general public. For example, services purchased through bulk purchasing arrangements are eligible.

2.11 Q: Where there is no commercially available internet access service option, what must an applicant do to seek support for construction of broadband networks?

A: Only where there is no commercially available internet access service option, applicants may seek support for construction of broadband networks. For network construction, applicants seeking support must:

1. provide clear evidence demonstrating how they determined that an existing fixed or mobile broadband network was or is not available including by seeking service from existing service providers serving the area prior to constructing the network;
2. define the geographic area that will be served and assess the estimated number of students and school staff, or library patrons to be served;
3. certify that they sought such service and providers were unable or unwilling to provide services sufficient to meet the remote learning needs of their students, school staff, or library patrons; and
4. show the construction is completed and services provided within one year of a funding commitment decision.

2.12 Q: Who owns the equipment purchased with ECF support?

A: Schools and libraries, as the applicants, will own the equipment purchased with ECF support.

2.13 Q: What if an applicant previously signed a multiyear contract (that includes this coming school year)? Can they apply for the services for this coming school year from the preexisting contract?

A: Applicants may seek reimbursement for the services that will be delivered between July 1, 2021 and June 30, 2022 on a preexisting contract if they are being provided to students, school staff, or library patrons with unmet needs.

2.14 Q: Are fees for unreturned leased equipment eligible for ECF support?

A: No. Charges for unreturned leased equipment are ineligible for Emergency Connectivity Fund support. Charges for termination liability (early termination), penalty surcharges and other charges not associated with the purchase of equipment or services are ineligible

2.15 Q: What will be the duration of internet service reimbursement?

A: Internet service reimbursement will be for services delivered between July 1, 2021 and June 30, 2022. Services delivered after June 30, 2022 will not be covered by the initial filing window.

2.16 Q: Will applicants be required to sustain the cost of the internet service until a Wi-Fi hotspot reaches the three-year mark?

A: No. For the initial application filing window, internet service will only be funded by the ECF Program through June 30, 2022, but there is no FCC requirement that an applicant must provide additional internet service for a hotspot device.

2.17 Q: If ECF-supported equipment is considered obsolete after three years, can a school or library repurpose the equipment for solely on-campus usage?

A: Yes. Obsolete equipment is covered under section 54.1713(b) of the ECF rules.

2.18 Q: Can a school or library keep the money for ECF-supported devices that are sold after the three-year mark?

A: Yes.

***2.19 Q: How should applicants request funding for equipment associated with a service request (e.g., a \$5 monthly fee for a modem or Wi-Fi hotspot connected to a broadband service)?**

A: Applicants should work with their service providers to separate the costs of the equipment from the services and submit them on separate funding requests.

Eligible Locations

3.1 Q: If a school reopens, and students and school staff are attending school in person, is off-campus equipment or service for that student or teacher still eligible for ECF support?

A: Yes. Such equipment and services are eligible if needed to meet the remote learning needs of students, such as homework, or school staff who would otherwise lack sufficient access to connected devices and/or a broadband internet access connection while off campus.

3.2 Q: In the event that students are attending school in person, can they bring their connected device on campus?

A: The rules only prohibit schools and libraries from requesting and receiving support for eligible equipment and services purchased for use solely at the school or library, and thus provide flexibility for some on-campus use as long as the eligible equipment and services were purchased primarily to provide off-campus access. Note: Fixed wireless and wireline connections purchased with funding from the ECF may not, however, be similarly used on-campus given that these connections are already eligible for funding under the E-Rate Program.

3.3 Q: Can schools use ECF support for internet service on buses that transport students to and from school?

A: Yes. Schools may use ECF support for internet service on buses that transport students, whether they are in transit or parked.

3.4 Q: If a school district provides a personal Wi-Fi hotspot and broadband service to a percentage of unserved students for use at home, and if the school district also applies for Wi-Fi hotspots on school buses, is this considered to be a duplicative service?

A: No, it would not be considered a duplicative service. A school may obtain funding for student hotspots and internet service, as well as hotspots for use on school buses. Schools must certify that they are serving an unmet need at the time they submit their application and be able to provide additional information, if requested

Eligible Uses

4.1 Q: Which school staff are eligible to receive equipment and services eligible for ECF support?

A: School staff that provide educational services to students, such as teachers and para-professionals that work with students in the classroom, including the virtual classroom, are eligible to receive ECF-funded equipment and services.

4.2 Q: For parked school buses or other multi-user locations, are other members of the community, besides students and school staff, permitted to use the internet access?

A: No, other members of the community are not permitted to use the services. Internet access must be primarily used for educational purposes and is limited to intended users.

4.3 Q: Are library staff eligible users?

A: While library staff are not explicitly included in the statute, we recognize that most library staff are also library patrons, and we therefore will consider such staff to be library patrons for purposes of the Emergency Connectivity Fund Program if they would otherwise lack access to connected devices and/or broadband connections.

4.4 Q: Can schools request ECF support for a small number of replacement devices that may be needed during the school year?

A: No. Applicants are limited to reimbursement of one connected device per student and cannot request additional connected devices or other equipment to account for anticipated loss or breakage.

***4.5 Q: Are libraries limited to lending ECF-funded equipment and services to K-12 students?**

A: No, there is no restriction that library-owned devices be loaned to K-12 students.

*Learn more about using ECF funds for 1:1 programs and to replace aging devices in questions 6.11 & 6.12 under Unmet Needs

Reasonable Support Amounts

5.1 Q: What are the reasonable support amounts for eligible equipment?

- The program will reimburse applicants a maximum of \$400 for each laptop or tablet, and a maximum of \$250 for Wi-Fi hotspots.
- For other eligible equipment and services, the FCC and USAC will review costs to ensure they are reasonable.

5.2 Q: Can a school or library purchase connected devices that cost more than \$400?

A: Yes, schools and libraries may buy more expensive laptops, tablets, or Wi-Fi-hotspots, but they can only be reimbursed up to \$400 for each laptop or tablet and up to \$250 for Wi-Fi Hotspots.

5.3 Q: Is the \$250 limit on Wi-Fi hotspots for hardware and monthly services, or just hardware?

A: The \$250 limit is a cap on the hardware cost for a Wi-Fi hotspot provided to a student, school staff, or a library patron. The monthly cost of services must also be reasonable, but is not included in the \$250.

5.4 Q: Are monthly services costs limited to \$25 per month?

A: No. The Order states that services would generally be in the range of \$10 to \$25 per month, but it did not set a maximum support amount in the way that it did for connected devices or Wi-Fi hotspots. USAC will review monthly service costs to ensure that they are reasonable. Applicants should be prepared to justify the service selection process they used and reasonableness of costs, if requested, during the review process.

5.5 Q: Can a tablet or laptop that can serve as a connected device and a Wi-Fi hotspot collect both \$400 and \$250 per device?

A: No, a school or library cannot receive additional funding for a tablet or laptop that can serve as both connected device and a hotspot. It is a connected device subject to the \$400 cap.

5.6 Q: Are Wi-Fi hotspots designed for many users, such as on a bus (e.g. 100+ users), limited to \$250?

A: No, the \$250 limit is a cap on the hardware cost for a Wi-Fi hotspot provided to an individual student, school staff, or a library patron. As with other eligible equipment and services, however, costs must be reasonable. Applicants should explain in their funding request narratives how the multi-user Wi-Fi hotspot is being used or provide an explanation for the higher cost and why the equipment was selected.

5.7 Q: What is the process for seeking a waiver of the \$400 limit if the reasonable cost to purchase connected devices for students, school staff, or patrons with disabilities is higher than \$400 and the public interest warrants deviation from the general rule?

A: Waivers must be requested from the Federal Communications Commission by filing in WC Docket No. 21-93. We encourage applicants to file their request for waiver as soon as they are aware of the need, although applicants will have 30 days from the date of the funding commitment decision letter.

Applicants may file a request for waiver of ECF rules before filing an application, however, we remind applicants that applications must be filed by August 13, 2021, even if requests for waiver have not been resolved by that date. Applicants may still be approved for funding for up to \$400 per device even if the applicant has or will submit a waiver to request additional funding for the connected devices for use by students, school staff or library patrons with disabilities.

Unmet Needs

6.1 Q: How should applicants determine their unmet needs?

A: The FCC has not prescribed a specific way for applicants to go about estimating what they will need to address unmet needs.

In the case of schools, applicants should provide their best estimates about the number of students who did not have access to adequate connected devices, broadband connections, or both when the pandemic began; the number of students who do not currently have adequate access; and how the applicant expects those numbers to change with the requested ECF Program support.

While the FCC has not dictated specific data collection requirements for estimating the unmet need for students, schools must describe how and when they collected the information that they use for the estimates provided in their responses on the application.

There is no such data collection requirement for libraries to estimate the unmet need for library patrons. However, both schools and libraries must certify that they are seeking support for eligible equipment and/or services for students, school staff, and/or library patrons that would otherwise lack adequate access.

We encourage applicants to make their best efforts to estimate what they will need and apply for ECF funding in a timely manner, just as they do for the E-Rate Program.

Applicants may seek funding for only one fixed broadband connection per location and only one connected device and/or Wi-Fi hotspot per student, school staff member or library patron.

See question 6.9 to learn more about what schools may need to show unmet need at the different stages of the ECF Program process (e.g., application, invoicing, or audits).

6.2 Q: May a school rely on a survey of its families' access to broadband services and devices, and then extrapolate the results of the survey to estimate the number of devices and Internet service plans to request in their ECF FCC Form 471 application?

A: Yes, only best estimates of the unmet need are required for schools on their application. It is up to the school to determine how to estimate need. Schools may also be asked to provide documentation to support actual costs of assigned equipment and/or services after funds have been committed.

6.3 Q: Is a current survey required or can the school rely on an earlier survey to estimate unmet needs on the ECF FCC Form 471 application?

A: Only best estimates of the unmet need are required for schools at the time they submit their application. This includes: (1) estimates about the number of students in their school or school district who did not have access to adequate connected devices, broadband connections, or both when the pandemic began; (2) the number of students who do not currently have access to adequate connected devices, broadband internet access connections or both; and (3) how they expect those numbers to change with the receipt of requested ECF support. It is up to the school to determine how to estimate need, and the school can use any method that indicates how the unmet needs during the pandemic were calculated. Here is a link to see the unmet need questions on the application: <https://www.emergencyconnectivityfund.org/ecf-fcc-form-471/entity-information/> .

6.4 Q: Do schools need to identify the names of specific students who lack access to a connected device or broadband connectivity on the ECF FCC Form 471 application?

A: No. Only best estimates about the number of students who did not have access to adequate connected devices, broadband connections, or both when the pandemic began, as well as the number of students who do not currently have access, are required for schools at the time they submit their application. No personally identifiable information (such as the names of students) should be provided to USAC during the application process.

6.5 Q: What does it mean for a household to lack access to broadband? For example, what if the school paid for a student's broadband service using other sources of funding, including federal funding, last year?

A: The Commission requires applicants to certify on the FCC Form 471 application that they are only seeking support for eligible services provided to students, school staff and library patrons who would otherwise lack broadband services and/or devices sufficient to engage in remote learning. In doing so, the Commission provided schools the discretion to determine whether their students or staff do not have access to adequate broadband connections. Schools and libraries should make a reasonable effort to make such a determination and retain documentation about the basis for doing so.

***6.6 Q: Does a school need to use a survey to demonstrate unmet need on their application?**

A: No. Schools are required to provide best estimates of the unmet need at the time they submit their application and may use whatever method they deem appropriate for estimating unmet need. The estimates could be based on the results of a survey, but a survey is not required.

*** 6.7 Q: It's summer vacation, and I don't know exactly how many students lack broadband access at home. What should I do?**

A: At the application stage, schools just need best estimates of their unmet need to request funding.

When it is time to invoice, schools may only request ECF reimbursement for services that fulfilled an actual unmet need of a student or staff member, consistent with the application certification. Schools may also be asked to provide documentation to support actual costs of services to those students and staff after funds have been committed.

*** 6.8 Q: Could a school district use the district's National School Lunch Program (NSLP) percentage, NTIA's "[Indicators of Broadband Need Map](#)" or other publicly available data to provide best estimates on its ECF FCC Form 471 application, and then collect a certification from students or staff before seeking reimbursement for the device or service?**

A: Yes. Again, only best estimates of the unmet need are required for schools at the time they submit their application. It is up to the school to determine how to estimate need. Schools may also be asked to provide documentation to support actual costs of assigned equipment and/or services after funds have been committed. A student or staff certification collected after the application but before receiving service/equipment may be an appropriate way to ensure the school is only seeking reimbursement for those students and staff with unmet need.

*** 6.9 Q: What will school applicants need related to unmet need at the different stages of the ECF Program process (e.g., application, invoicing, or audits)?**

A: At the application stage, schools just need best estimates of their unmet need. They may use whatever method they deem appropriate for estimating unmet need and are not required to provide any documentation to support these estimates when they submit their ECF FCC Form 471 application. Here is a link to see the unmet need questions for schools on the application: www.emergencyconnectivityfund.org/ecf-fcc-form-471/entity-information.

When schools file for reimbursement, they should only request reimbursement for eligible equipment and services provided to students or staff who would otherwise lack broadband services and/or devices sufficient to engage in remote learning. For example, if a school requested ECF funding to support the broadband services at the homes of 100 students based on an estimate of those that lack services, but it determines during the school year that only 90 students have unmet need, the school should only seek reimbursement for the services provided to those 90 students. Schools may also be asked to provide documentation to support actual costs of assigned equipment and/or services after funds have been committed.

All applicants should also maintain documentation supporting their compliance with ECF Program rules.

***6.10 Q: What will library applicants need related to unmet need at the different stages of the ECF Program process (e.g., application, invoicing, or audits)?**

A: At the application stage, libraries may request funding for eligible equipment and services. Like schools, libraries must certify that they are only seeking support to address unmet need, but are not required to provide best estimates of unmet needs on their ECF FCC Form 471 applications.

To ensure libraries are providing eligible equipment and services to patrons with unmet needs, ECF rules require libraries to, on a going forward basis, provide patrons with a copy of an eligible use policy, which explains that the equipment or service is intended for library patrons who do not otherwise have access to equipment or services sufficient to meet the patrons' educational needs, and patrons must sign and return a statement saying they would otherwise lack such access. Documentation supporting these certification statements may be requested to show compliance with ECF rules.

All applicants should also maintain documentation supporting their compliance with ECF Program rules. Please see FAQ 8.1 for more information about library recordkeeping.

***6.11 Q: If a district-owned connected device was assigned to a student, but the device is no longer sufficient to engage in remote learning (for example, a three-year old laptop), can the district request ECF support for a new connected device?**

A: Yes. If a device is no longer sufficient for a student to engage in remote learning, ECF support can be used to provide a new device. Applicants must certify on their funding application that they are only seeking support "for eligible equipment and/or services provided to students and school staff who would otherwise lack connected devices and/or broadband services sufficient to engage in remote learning."

* This was previously FAQ 4.3.

***6.12 Q: Can an applicant request funding for connected devices or Wi-Fi hotspots for all of its students as part of a 1:1 device initiative?**

A: No. Applicants must certify, as part of their funding application, that they are only seeking support for eligible equipment and/or services provided to students and school staff who would otherwise lack access to connected devices or broadband services sufficient to engage in remote learning.

* This was previously FAQ 4.4.

***6.13 Q: If students have devices at home, but they are inadequate for the students to participate in remote learning (e.g., due to age or not meeting minimum technical requirements), can schools still buy a device for them?**

A: During the initial application filing window, applicants may only seek support for eligible equipment and/or services for students that lack access to connected devices and broadband

connections sufficient to engage in remote learning during the upcoming school year. We leave it up to schools to determine whether a student's existing device is sufficient to engage in remote learning. Applicants must also certify on their funding application that they are only seeking support "for eligible equipment and/or services provided to students and school staff who would otherwise lack connected devices and/or broadband services sufficient to engage in remote learning." Schools should document how they determined that the existing devices were inadequate.

Application Process

***7.1 Q: Do applicants need to have contracts in advance of submitting an application for ECF support?**

A: No, contracts are not required under the ECF Program rules, but applicants are required to comply with state, local, or Tribal procurement laws or regulations. Applicants also do not need to have already placed an order for eligible equipment or services prior to filing an application.

Please see [DA 21-881](#) for more information about the application certification language in 47 CFR 54.1710(a)(1)(x).

7.2 Q: Can applicants change their service providers after they file their applications?

A: Yes, applicants may change service providers.

***7.2.a Q: Can applicants change the make or model of their equipment after they file their applications?**

A: Yes, applicants may make service and equipment substitutions after getting a funding commitment.

7.3 Q: Will applicants be required to upload proof of ordering or a vendor quote with the Form 471 application?

A: No, documentation is not required for the application. However, if the applicant would like to upload a contract or proof of order for their funding request, they will still be able to do so on their FCC Form 471.

7.4 Q: Will USAC wait to approve applications until the application filing window closes?

A: Yes. In order to assess the demand for funds, USAC will wait until the application filing window is closed before issuing funding commitment decision notifications.

***7.5 Q: Will application and pricing information be made available through Open Data?**

A: Yes. The Order states that Emergency Connectivity Fund Program application and pricing data will be made available through Open Data within 160 days after the initial application filing window closes and we are making every effort to make this data available earlier, if possible.

***7.6 Q: Are applicants required to conduct competitive bidding, like they do for the E-Rate program?**

A: No. There are no Commission-mandated competitive bidding requirements for the Emergency Connectivity Fund, but schools and libraries are required to certify that they have complied with state, local and Tribal procurement requirements.

***7.7 Q: When I request funding for equipment, what do I use as the service end date in the application?**

A: For equipment or other non-recurring services that have not been received when the applicant submits the application, applicants may use June 30, 2022 as the service end date.

Please see [DA 21-881](#) for more information about the deadline for invoicing for these non-recurring purchases.

Record Retention Requirements

8.1 Q: Do I need to modify my library inventory system to track all of the required recordkeeping data in a single report?

A: No. While a library is responsible for retaining all of the information required by the Commission's rules, it does not need to be managed or maintained in a particular format. Libraries can determine how they format, extract and save the required data. For example, if a library separately tracks its inventory, circulation history and patron data, and collectively all required information is retained for the requisite period of time, no modifications to the library's recordkeeping system would be needed. In cases where the information is requested by the Commission or USAC, libraries will not be required to modify the information (e.g., connect separately tracked patron data to circulation data) prior to submission. In requiring libraries to collect and document this information, we commit to ensuring that if the Commission or USAC staff need to access this information (e.g., for audit purposes), they will request and safeguard the information in accordance with the applicable privacy laws and guidance, including using de-identified and anonymized information whenever possible.

8.2 Q: Do schools and libraries need to keep documentation of the specific students, school staff, or library patrons who receive ECF-supported service or equipment?

A: Applicants do need to document the students, school staff, and library patrons served at each location and must retain that information for at least 10 years from the last date of service or delivery of equipment. To the extent Commission or USAC staff needs access to this information, for example, for audit purposes, they will request and safeguard this information in accordance with the applicable privacy laws and guidance, including using de-identified and anonymized information whenever possible.

8.3 Q: Are applicants obligated to repair devices that break before the three-year mark?

A: No. However, it is the obligation of schools and libraries to keep track of and document the devices and other equipment that they distribute, and that includes documenting information about missing, lost, or damaged equipment.

8.4 Q: What would a public library need to do if a patron moves and does not return an ECF-funded connected device?

A: The library must keep track of and document the devices and other equipment that they distribute, and that includes documenting information about missing, lost, or damaged equipment. Libraries can establish their own policies around missing, lost, or damaged equipment and patron responsibilities.

***8.5 Q: What documents am I required to retain and for how long do I need to keep them?**

As part of the record retention requirements established in the Order, we require applicants to retain for 10 years asset inventories for each connected device or other piece of equipment provided to an individual student, school staff member, or library patron. The asset inventory must identify: 1) the device or equipment type; 2) the device or equipment make/model; 3) the device or equipment serial number; 4) the full name of the person to whom the device or other piece of equipment was provided; and 5) the dates the device or other piece of equipment was loaned out and returned, or the date the school or library was notified that the device or other piece of equipment was missing, lost, or damaged. Applicants must also retain a record of services purchased with ECF support. The record of services must include the following information: (a) type of service provided (i.e., DSL, cable, fiber, fixed wireless, satellite, mobile wireless); (b) broadband plan details, including: upload and download speeds and monthly data cap; (c) the name(s) of the person(s) to whom the service was provided; and for fixed broadband service; (d) the service address, and (e) the installation date of service: and (f) the last date of service (as applicable). Please see FAQs 8.1 and 8.2 for more information about library recordkeeping.

Invoicing Process

9.1 Q: Do approved applicants that receive recurring monthly services need to submit invoices within 60 days of each monthly invoice?

A: No. For recurring services that are invoiced on a monthly or periodic basis, approved applicants may invoice within 60 days of the last date of service (i.e., they must invoice at least once by August 30, 2022 for services received through June 30, 2022).

9.2 Q: Can applicants pre-pay for a year of services and seek reimbursement as soon as they have a funding commitment?

A: No. Approved applicants cannot invoice for services that have not yet been received.

9.3 Q: Can a school or library apply for reimbursement before paying the service provider?

A: Yes. Applicants can submit requests for reimbursement before they have paid the service provider if they have entered into contractual arrangements or are otherwise legally obligated to purchase eligible equipment and services from their service provider. Applicants must pay their service provider within 30 days after receipt of funds and will be required to certify compliance and provide verification of payment to the service provider.

9.4 Q: Is there a minimum number of days that hotspots or connected devices must be in use – that is, loaned out to library patrons – to justify reimbursement for the services or equipment?

A: The Commission did not adopt a hard and fast test, but imposed an obligation on applicants not to seek support for services or equipment that are not being used. Our goal is to avoid having applicants seek support for devices that are being warehoused, but there is not a set minimum number of days that ECF-supported devices and services must be in use.

***9.5 Q: Does an applicant using SPI invoicing need to register with SAM.gov?**

A: No, applicants in the ECF Program whose service providers will file invoices on their behalf for ECF reimbursement (SPI invoicing) are not required to register in SAM.gov.

***9.6 Q: For equipment purchases, what is the deadline for filing requests for reimbursement?**

A: For equipment or other non-recurring services that have not been received when the applicant submits the application, applicants may use June 30, 2022 as the service end date and the invoicing deadline will be 60 days from the date of the funding commitment decision letter; a revised funding commitment decision letter approving a post-commitment change or a successful appeal of previously denied or reduced funding; or August 29, 2022 (i.e., 60 days after June 30, 2022), whichever is later.

Please see [DA 21-881](#) for more information about the deadline for invoicing for non-recurring purchases.

Children’s Internet Protection Act

10.1 Q: Do the Children’s Internet Protection Act (CIPA) requirements apply for all equipment that is eligible for ECF support?

A: No. CIPA requirements apply only to school- or library-owned computers (e.g., tablet computers and laptop computers), and only when the school or library receives ECF or E-Rate support for internet access or internet services, or E-Rate support for internal connections—or network equipment for internet access, internet service, or internal connections.

We correct an earlier version of this FAQ to make clear that while CIPA does not impose any requirements on Wi-Fi hotspot devices, the purchase through ECF of such Wi-Fi hotspots would qualify as network equipment and would require CIPA compliance for the school’s or library’s computers.

10.2 Q: Do CIPA requirements apply to school- or library-owned connected devices if the school or library does not also receive ECF or E-Rate support for internet access or internet services, or E-Rate support for internal connections?

A: No. CIPA does not apply to the use of computers owned by a school or library, including those laptop computers or tablet computers purchased with ECF support, if the purchasing entity does not also receive ECF or E-Rate discounted internet access or internet services, or E-Rate discounted internal connections—or network equipment for internet access, internet service, or internal connections.

10.3 Q: Do CIPA requirements apply if a school or library owns computers (regardless of how the computers were funded) and receives ECF or E-Rate support for internet service?

A: Yes. CIPA requirements apply to school- or library-owned computers when the school or library receives ECF or E-Rate support for internet access or internet services, or E-Rate support for internal connections—or network equipment for internet access, internet service, or internal connections.

10.4 Q: Do CIPA requirements apply to a student-, school staff-, or library patron-owned computer if it uses an ECF-funded broadband connection?

A: No. CIPA does not apply to the use of third-party owned devices, even if the school or library receives ECF support for the broadband connection.

10.5 Q: Will applicants be required to certify CIPA compliance on their ECF application if they have already certified to CIPA compliance for FY2021 in the E-Rate program?

A: No. If applicants have already certified their CIPA compliance in an FCC Form 486 or FCC Form 479 for the current funding year in the E-Rate program, they are not required to certify compliance for the ECF Program. If an applicant's existing certification states that CIPA does not apply, and the applicant's ECF purchases trigger CIPA compliance requirements, the applicant will be required to provide new certifications on their ECF FCC Form 471.

10.6 Q: If applicants have not yet certified to CIPA compliance for FY2021 in the E-Rate program, will they be required to certify their CIPA compliance status on their ECF application?

A: Yes. Applicants that have not certified their compliance in an FCC Form 486 or FCC Form 479 for the current funding year in the E-Rate program will be asked to certify their CIPA compliance status on the ECF FCC Form 471.

10.7 Q: If a school or library that is not currently participating in the E-Rate program already owns computers when it applies for ECF funding for the broadband connections, should the school or library certify to CIPA compliance?

A: Yes. To receive ECF funding, an applicant must certify either that its devices are in compliance with CIPA requirements or, at a minimum, that it is undertaking the actions necessary to comply with CIPA requirements.

10.8 Q: Can a school or library seek ECF support to implement filtering services on their computers?

A: No. The costs of implementing CIPA compliance are not eligible for reimbursement through the ECF Program.

10.9 Q: Do CIPA requirements apply if a school or library owns computers and seeks ECF support for internet service, but on July 1, 2022, the school or library begins paying for the services on its own?

A: A school or library must be in compliance with CIPA until June 30, 2022 (the end of the funding term). After June 30, 2022, CIPA compliance is not required for the school's or library's computers if it no longer receives ECF or E-Rate discounted internet access or internet services; E-Rate discounted internal connections; or network equipment for internet access, internet service, or internal connections.

If the school or library applies to receive discounts for these services through ECF or E-Rate after June 22, 2022, it will be required to bring its devices into compliance.

Duplicative Funding

11.1 Q: Can an applicant receive ECF funding for a broadband connection to the home for a student that previously received support for that connection from another government program (such as CARES Act funding) that is no longer available?

A: ECF rules do not permit applicants to receive duplicative support for the portion of the services that have already been reimbursed through other federal or state programs. If a student's household is receiving support from, for example, the Emergency Broadband Benefit (EBB) Program for broadband internet access connectivity, the student would not be eligible for broadband connectivity under the ECF Program.

If the previous program funding is no longer available, and the student as a result lacks adequate access, the applicant may seek funding for providing broadband connectivity to that student.

Additionally, a student whose household is receiving broadband service through the EBB Program could receive a connected device through the ECF Program if they would otherwise lack such access.

***11.2 Q: Can a school who has received ESSER or CARES Act funds to buy connected devices/hotspot devices apply for ECF funding?**

A: It depends. While ECF rules do not permit applicants to receive duplicative support for equipment or services that have already been reimbursed through other federal or state programs, an applicant may seek funding for any portion of the costs of the equipment or services that were not covered. They may also seek support to address ongoing unmet needs that are not covered through other funding sources.

FAQ Updated 07/26/21