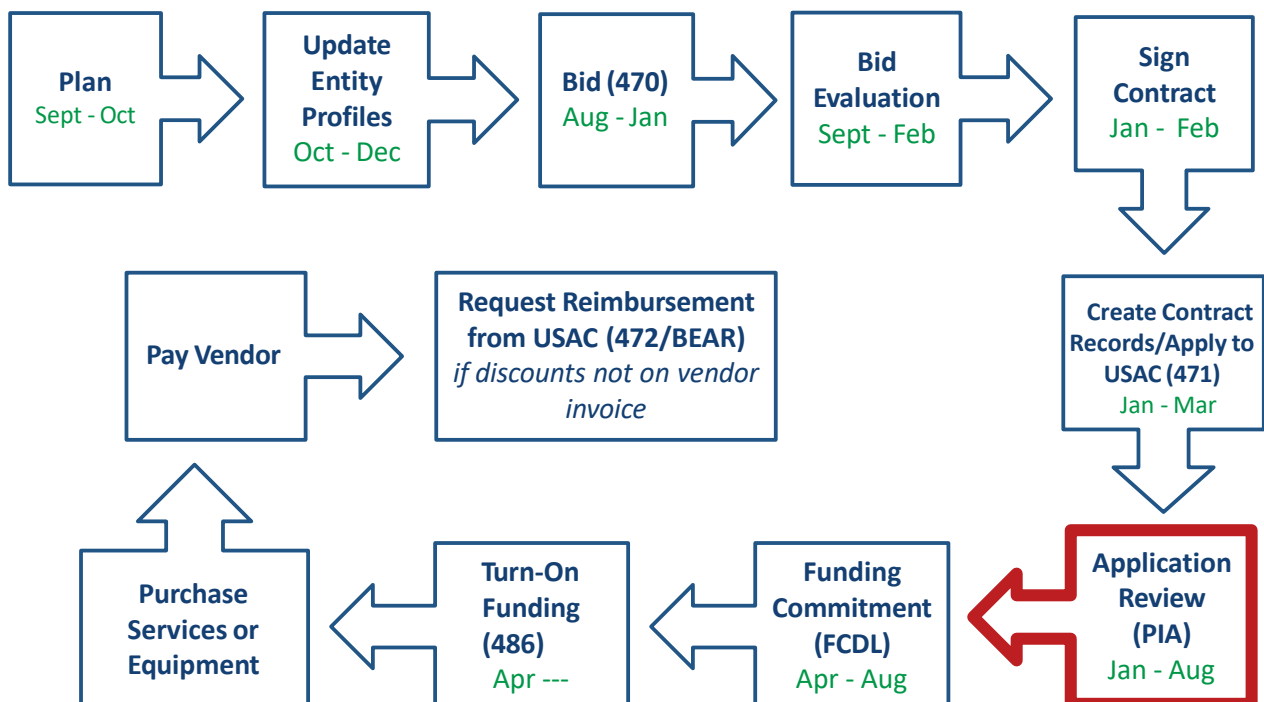# Program Integrity Assurance (PIA) Guide
FY 2026

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south dakota
DEPARTMENT OF EDUCATION
Learning. Leadership. Service.

You are **here** in the E-Rate process:

Plan	Update Entity Profiles	Bid (470)	Bid Evaluation	Sign Contract
Sept - Oct	Oct - Dec	Aug - Jan	Sept - Feb	Jan - Feb

Create Contract Records/Apply to USAC (471)
Jan - Mar

Application Review (PIA)
Jan - Aug

Funding Commitment (FCDL)
Apr - Aug

Turn-On Funding (486)
Apr ---

Purchase Services or Equipment

Pay Vendor

Request Reimbursement from USAC (472/BEAR)
if discounts not on vendor invoice

What is PIA?

- PIA = Program Integrity Assurance Review
- Stage of application process where USAC reviews every application for the following compliance:
  - Eligible Entities
  - Competitive Bidding
  - Eligible Services/Equipment
  - Appropriate Discount Level
  - Category 2 Budget Verification
  - Contract Signing
- All PIA "inquiries" are issued via applicants' EPC portals
  - Applicants must submit responses to the PIA inquiries in EPC

PIA Review Inquiries

- The 471 main contact will receive an email notification that a PIA reviewer has questions about their application
  - The email will list the 471 # and the general subject of the inquiry (e.g. Eligibility of Services or Discount Rate), but will **not** contain the actual PIA questions.
  - Before clicking on the link in the email, you must first sign into EPC
    https://forms.universalservice.org/portal/login
  - Then click on the link in the PIA email to be taken to the PIA Inquiry Page
    - The 471 main contact will also see the PIA Inquiry under **Tasks**

- PIA email notification will look like…

PIA Inquiry Page

Step 1) Click "Respond to Inquiries" which will then turn the Inquiry Name the color blue and make it an active hyperlink.

Step 2) Click on the <u>hyperlink</u> to see the actual PIA questions.

(1)

Records / FCC Forms 471

- Category 1 Form 471 - FY 2022 - #221010

REQUEST EXTENSION | RESPOND TO INQUIRIES | SUBMIT MODIFICATION REQUES...

Summary Funding Requests **Review Inquiries** Deferral History Discount Calculation Entity Information News Related Actions

Pending Inquiries

Read	Notice	Name	Outreach Type	Assigned By	Title	Phone #	Assigned Date ↓	Due Date	Extn.	Status
👁	🗒	Other Issues	Regular 15-Day	Jessica Keller	E - Rate Reviewer	833-205-1185 Ext.58647	2/15/2022 6:08 PM EST	3/2/2022	0	Saved & Waiting to submit
👁	🗒	Competitive Bidding	Regular 15-Day	Jessica Keller	E - Rate Reviewer	833-205-1185 Ext.58647	2/15/2022 5:35 PM EST	3/2/2022	0	Saved & Waiting to submit

(2)

Shows the date by which your PIA answers must be submitted. If you need additional time, click "Request Extension" at the top of the page.

6

PIA Questions Page

Read the questions carefully and upload or provide an answer as appropriate. When **all** questions have been completed, click "Submit."

Your response to PIA's questions:

#	Question	Response
1	Please provide vendor documentation which supports the funding request amount of $6,300.00/month. Note: Any vendor documentation (e.g. contracts, vendor quotes, vendor bills, invoices, etc.) provided should clearly identify any ineligible charges that were cost allocated out of your request. Also, please be sure to explain any discrepancies between the amount requested and amount supported.	UPLOAD Drop file here
2	If you are requesting additional dollars to accommodate expected growth or increased usage, please provide any relevant documentation that you used when determining the estimate for expected growth or increased usage.	UPLOAD Drop file here
3	If you would like to provide any additional information about these issues that have not been addressed above: Use the text box to type information, or upload additional documentation using the "Browse" button.	

You can use the last text box to provide additional information/details that are relevant to the PIA review

+Add Document

To add additional documents, click "Add Document."

DELETE UPLOADED FILES

SAVE & CLOSE   SUBMIT

Finding Pending Inquiries in EPC

- In addition to the PIA inquiry email notification, any user for the school/library can access the inquiry on their EPC Landing Page
- "**Pending Inquiries**" section at the top of the page
  - **Click on the down arrow to expand**
  - **Type = FCC Form 471**
  - **Funding Year = 2026**
  - **Then click 'Apply Filters' to see pending PIA inquiries**

Universal Service Administrative Co.

Funding Request Report | FCC Form 470 | FCC Form 471 | FCC Form 486 | FCC Form 500 | SPIN Change | Appeal | Service Substitution | Manage My Organization | USAC Website | Contact Us | Help

⌄Pending Inquiries

Type	FCC Form 471 ▾	Application/Request -- Enter an Application/Request ID or Nickname --
Funding Year	▾	BEN -- Enter a BEN ID or Name(Maximum 10) --

APPLY FILTERS   CLEAR FILTERS

Confused by PIA Inquiry Questions?

- If you receive a PIA inquiry and are confused, you may email your PIA reviewer using the contact information provided atthe bottom of the initial PIA inquiry email.

> If you have any questions as you work through your responses to the PIA review inquiries, please feel free to contact me via the phone number or e-mail address provided below. Please do not use e-mail to submit your responses to the PIA review inquiries. USAC will not review responses to PIA review inquiries sent to the reviewer's email address. All PIA responses must be submitted in EPC. Again, please be sure to provide complete responses to all of the PIA questions. If you need additional time to prepare your response, you may request an extension. Click the "Request Extension" button, located at the top of the "Review Inquiries" page in EPC. Your first extension request will be automatically granted, and you will receive an additional seven days to respond. Be sure to meet the response due date and provide all of the information requested, otherwise your application(s) may receive reduced funding or a funding denial. Note: Your State E-Rate Coordinator is copied on this correspondence for informational purposes only.
>
> Sartoris Ward
> E-Rate
> 833-205-1185 Ext.72556
> sartoris.ward@usac.org

- You also may contact your state E-rate coordinator, Debra Kriete, if you are unsure how to answer a question
  - If you do, please provide a copy of the actual PIA questions

9

Deadline to Reply

- PIA inquiries typically provide applicants with 15 days to respond.
  - You are encouraged – strongly – to respond as soon as you receive the email. The sooner you respond, the sooner you'll receive your Funding Commitment Decision Letter (FCDL).
- If you haven't responded to the PIA inquiry within 7 days of the initial request, PIA will send you a reminder
- If you haven't responded after 15 days, USAC may act on the information they already have to make a funding decision (which typically means denial)

10

Requesting an Extension

- Applicants can request a single, 7-day extension of the original deadline if you need more time. To do so, access your PIA Inquiry in EPC, click **Request Extension** at the top of the page.

- The first extension request will be automatically granted. If you still need more time, you <u>must</u> have a good reason to need extra time, and PIA will review your extension request before making a decision.

11

To See What Was Submitted...

To see the responses submitted, locate your Form 471, then click 'Review Inquiries' in the toolbar. Under Submitted Inquiries, it will display each inquiry. Click on the Name to see your responses/documents.

12

School Entity Questions

- These questions typically are for non-traditional or new entities
    - Head start
    - Pre-K
    - New entities
- Check Educational Directory for entity to provide eligibility documentation
    - https://doe.sd.gov/ofm/edudir.aspx
- Contact State Coordinator for third party verification
- May also provide discount validation documentation
- May also need to provide enrollment validation for C2 budget

13

Discount Validation Questions

- State provides 'valid file' to USAC containing enrollment and NSLP information for all entities that participate in NSLP from October 2025
    - When the valid file has a different discount for the entity than the information entered into EPC, the applicant is asked to provide supporting documentation
- Schools that do not participate in NSLP are not in the valid file
    - The applicant may be asked to provide supporting documentation for the entity's discount

14

Contract and Bidding Questions

- PIA may ask for a copy of the contract for an FRN
    - The applicant's signature on the contract is required before the form 471 is certified.
    - If there is no signed contract dated before the form 471 was certified, look for other evidence such as emails, purchase order or board approval minutes to document the applicant intended to be legally bound to purchase the equipment or services listed in the FRN.
- PIA may also ask for bidding documents such as:
    - Bid evaluation documentation
    - All bids received
    - Vendor communications

FRN Calculation Questions

- If you are asked for documentation to support your FRN calculations:
- Suggestion – provide the source document (contract or vendor invoice) and then prepare a spreadsheet that explains which cost from the contract or invoice is on each FRN line item
- Provide the reviewer with a roadmap that links the FRN to the source document.
- For example:

Line Item #	Source Document (page or Line Item)	Unit Cost	Ineligible Costs	Eligible Unit Cost	Quantity	Total Line Item Amount
001						
002						

Equipment/Service Eligibility

- PIA may ask for information to establish product/service eligibility
  - Contract may contain required information
  - Check with vendor/manufacturer if more detail is needed
- PIA may inform you that the product is ineligible or partially eligible and seek to reduce your FRN
  - If you disagree, make sure you provide alternative documentation and explain why you do not agree
  - PIA may then create a separate FRN for the disputed items and deny funding for that FRN and approve funding for all other items in original FRN
    - Applicant can then decide whether to appeal the partial denial

17

Modification Notification

- Whenever a change is made to your form 471, the reviewer will send a "Modification Notification" outreach.
- The same email will be sent to you as for other PIA outreach inquiries.
- When you log into your EPC account, you will see:

Outreach Type
Modification Notification

- The notice will state that no response is required. **DON'T RELY ON THIS!**
- When you review the notification, it will explain what changes are being made, and may state:
  - *If the modifications listed above should not be performed and you have alternative information, please upload your supporting documentation. If you would like to provide any additional explanation to support your position, type your explanation and attach the explanation and/or documentation into your response by using the Add Document button. If you agree with the proposed action, click the "Submit" button to clear this item from your Pending Inquiries.*

18

Modification Notification Continued

- It is advisable to act quickly if you disagree with the modification because there is no set deadline for the response.
- Consequently, the application may be forwarded for processing at the next phase.
- Suggestion: call the reviewer and speak to them or leave a voice mail to advise that you do not agree with the modification and have submitted documentation/response why the change should not be made.
- If the modification is made, and the FCDL reflects the change you disagree with, you will have to submit an appeal to USAC to request the change to be rescinded.
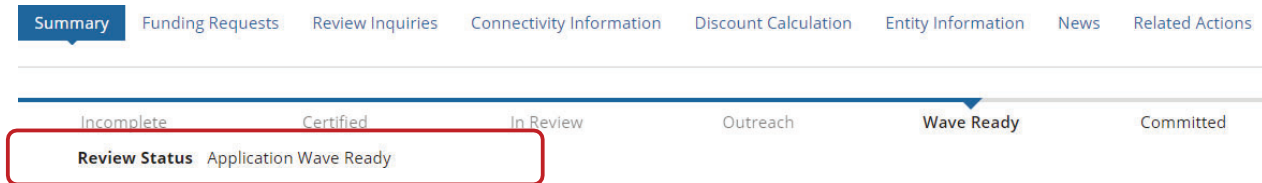
What Happens Next?

- After PIA review, the application likely will move to "Wave Ready" status which likely means that the application will be funded in an upcoming wave
  - First "wave" will likely be late April
- After an application has been "funded" in a wave, USAC will email a Funding Commitment Decision Letter (FCDL)
  - All FCDL notifications will also appear in EPC
  - Landing Page > Notifications > FCDL > Funding Year
  - Click on "View Notification" to see FCDL details

Notifications

	Notification Type	Funding Commitment Decision Letter		Status	● All
	Funding Year	2018			○ Generated
					○ Not Generated

	Notification	Description	Issued Date	Generated By	Generated On	
🔍	Funding Commitment Decision Letter	FCC Form 471 - 181035843	1/16/2019	EPC System	1/16/2019 12:02 AM EST	View Notification
🔍	Funding Commitment Decision Letter	FCC Form 471 - 181030090	1/11/2019	EPC System	1/11/2019 12:03 AM EST	View Notification

Checking Your Form 471 Status

1. Search for Form 471 in EPC:
   - **Bottom of EPC Landing Page under FCC Forms**
   - **Under Records on top toolbar**
2. At the top of the page, a bar will show the progress of the Form 471
3. Below that, it will show the Application Review stage of the Form.

Summary	Funding Requests	Review Inquiries	Connectivity Information	Discount Calculation	Entity Information	News	Related Actions

Incomplete	Certified	In Review	Outreach	**Wave Ready**	Committed

Review Status Application Wave Ready

To see a more detailed status, use the FRN Status Tool (FST):

https://data.usac.org/publicreports/FRN/Status/FundYear

Various Statuses

- **471 Status Descriptions:**
  - **In Review:** USAC received your certified 471 and is reviewing it
  - **Outreach:** USAC requires additional information and requires a response from you
  - **Wave Ready:** USAC has completed the PIA review and will issue a decision soon
  - **Committed:** USAC has issued a Funding Commitment Letter (FCDL)

- **Detailed Review Status Descriptions (from FST):**
  - **Awaiting Initial Review:** Application has not yet been assigned to a PIA reviewer
  - **Assigned to Initial Review:** Application has been placed in a PIA reviewer's queue
  - **15 Day Notice**: PIA has sent questions to the 471 contact that require a response from you
  - **Final Review**: Application has gone through initial review and may either proceed to Wave Ready Status, QA Status, or may be returned for additional review
  - **Application Wave Ready**: PIA is complete and will likely be included in the upcoming funding "Wave"