

EMERGENCY CONNECTIVITY FUND

FREQUENTLY ASKED QUESTIONS

What Is the Emergency Connectivity Fund?

- The [Emergency Connectivity Fund](#) is a \$7.171 billion program funded by the American Rescue Plan Act of 2021 to help schools and libraries support remote learning. The Program will provide funding to schools and libraries for the reasonable costs of eligible equipment and services that can be provided to students, teachers, and library patrons who lack connected devices, such as laptop or tablet computers, and/or lack broadband access during the pandemic.
- The Federal Communications Commission unanimously adopted a Report and Order on May 10, 2021 establishing the rules and procedures for the [Emergency Connectivity Fund Program](#).
- The Universal Service Administrative Company (USAC) is the program administrator.
- On May 11, 2023, the COVID-19 public health emergency expired. As such, ECF funding will only be available for purchases of eligible equipment and services made by June 30, 2024, the sunset date for the program.

Who Is Eligible to Receive Funds Through the Emergency Connectivity Fund Program?

- Schools, libraries, and consortia of schools and libraries that are eligible for support under the [FCC's E-Rate program](#), are eligible to request and receive support through the Emergency Connectivity Fund Program.
- In addition, the Order clarifies that Tribal libraries, which are eligible for support under the Library Services and Technology Act, are eligible for the Emergency Connectivity Fund Program.
- Schools and libraries eligible for the Emergency Connectivity Fund Program do not need to be current E-Rate participants. Eligible entities that have not applied for E-Rate support should be prepared to demonstrate eligibility as a school or library under the Program rules during USAC's application review.

What Equipment and Services Are Covered by the Emergency Connectivity Fund Program?

- The following types of equipment purchased for off-campus use by students, school staff, and library patrons who would otherwise lack sufficient connectivity to engage in remote learning are eligible for support:
 - Laptop and tablet computers

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- Wi-Fi hotspots
 - Modems (including air cards)
 - Routers
 - Devices that combine a modem and router
- Schools and libraries can also receive funding for commercially available broadband internet service that provides a fixed or mobile broadband connection for off-campus use by students, school staff, or library patrons who would otherwise lack access to connectivity sufficient to engage in remote learning.
 - In limited circumstances where a school or library can demonstrate that there are no available service options sufficient to support remote learning for its students, school staff, or library patrons, the Emergency Connectivity Fund Program may support the construction of new networks and the equipment needed for datacasting services.
 - Review the [Eligible Services List](#) for additional guidance on the equipment and services eligible for funding under the Emergency Connectivity Fund Program.

What Can a School or Library Expect After Applying?

- The initial application filing window closed on August 13, 2021, the second application filing window closed on October 13, 2021, and the third application filing window closed on May 13, 2022.
 - During the first two application filing windows, applicants could submit requests for funding to purchase eligible equipment and up to a maximum of 12 months of services received between July 1, 2021 and June 30, 2023. For certain applicants, the service delivery deadline was extended on May 12, 2023. See [DA 23-405](#) for more details.
 - During the third application filing window, applicants could submit requests for funding to purchase eligible equipment and up to a maximum of 12 months of services received between July 1, 2022 and June 30, 2024.
- USAC and the FCC will review and process applications on a rolling basis.
- Applicants and their service providers will receive a Funding Commitment Decision Letter (FCDL) approving or denying funding requests.
- Participants can request certain changes to their funding requests and request reimbursement through the ECF Portal. For details on next steps, participants may refer to the request for reimbursement checklist for [applicants](#) or [service providers](#) (invoicing on behalf of applicants). For more information about the Post-Commitment and Reimbursement processes, visit emergencyconnectivityfund.org.
- Detailed information on the status of Emergency Connectivity Fund applications is available in the [Open Data](#) Platform, including applicant details, requested funds, individual product or service details, funding commitment and disbursement information.

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- Current funding commitment information is available at <https://www.fcc.gov/ecf-current-funding-commitments>.

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?

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

1.7 Q: Are home-schooled students eligible for ECF supported devices and services?

A: When home-schooled students who lack access to eligible equipment or services are considered to be enrolled in public or non-profit private schools that provide elementary or secondary education, under the law of the applicable state, those schools can seek support from the Emergency Connectivity Fund Program for funding to provide such students with eligible equipment or services.

Similarly, eligible libraries could purchase eligible equipment or services for library patrons, including home-schooled students with an unmet need using ECF support.

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, software, content filtering and security services included in the price of the connected devices are eligible for support and do not require cost allocation. However, separately priced licenses are ineligible for ECF funding. Additionally, separate costs

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for non-connected accessories, e.g., cases, mouse pads, cable clips, laptop bags, tablet stands, wall mounts, and charging stations, are also ineligible.

ECF support for connected devices is capped at \$400 per device, even if the base price includes the cost of licenses, software, content filtering, security services, and non-connected accessories. Separately identifiable costs associated with ineligible components will be removed from requests for reimbursement.

2.5 Q: Do the eligible equipment and services need to have been purchased and received after the start date of the relevant funding period?

A: Equipment and services may have been ordered before the start date of the funding period for the applicable filing window (i.e., July 1, 2021 for the first or second application filing windows or July 1, 2022 for the third application filing window), but they cannot be received, delivered, or paid for before that start date. Note: There is an exception for monthly services that were prepaid prior to the adoption of the ECF Order and for leased devices arrangements contracted prior to the start of a funding period (see FAQs 2.5A and 2.6 below).

2.5a Q: Our school entered into a three-year lease agreement for laptop computers before the start date of the funding period to support online learning during the pandemic. Since we will continue to be paying for them during the funding cycle for the ECF program, do they qualify for this program?

A: Yes. Applicants may request support for up to a maximum of 12 months of recurring services delivered within the relevant funding period.

- Except for a small number of applicants with an extension under [DA 23-405](#), first and second window applicants may request support for up to a maximum of 12 months of recurring services delivered between July 1, 2021 and June 30, 2023 (see [DA 22-176](#)).
- Third application filing window funding requests may seek support for up to a maximum of 12 months of recurring services delivered between July 1, 2022 and June 30, 2024 (see [DA 23-405](#)).

******Please see FAQ 9.6a for additional information on the extended service delivery date and the invoice filing deadline applicable to first and second window ECF funding requests and see FAQ 9.6 for information on the service delivery date and the invoice filing deadline applicable to third window ECF funding requests.

2.6 Q: 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 in 2020?

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A: In some situations, applicants may request funding for up to a maximum of 12 months of services delivered within the relevant funding period, including services 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.

- Except for a small number of applicants with an extension under [DA 23-405](#), first and second window applicants may request funding for up to a maximum of 12 months of services delivered between July 1, 2021 and June 30, 2023 (see [DA 22-176](#)).
- Third window applicants may request funding for up to a maximum of 12 months of services delivered between July 1, 2022 and June 30, 2024 (see [DA 23-405](#)).

Such applicants may not seek reimbursement until after the services have been delivered. Prepaid equipment is ineligible for ECF support during the first, second, and third application filing windows, which are limited to equipment and services received, delivered, and paid for after the start date of the relevant funding period (i.e., July 1, 2021 for first and second window ECF funding requests or July 1, 2022 for third window ECF funding requests).

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

A: No. Applicants may only request support for up to a maximum of 12 months of services delivered within the relevant funding period.

- Except for a small number of applicants with an extension under [DA 23-405](#), first and second window applicants may only request support for up to a maximum of 12 months of services delivered between July 1, 2021 and June 30, 2023 (see [DA 22-176](#)).
- Third window applicants may only request support for up to a maximum of 12 months of services delivered between July 1, 2022 and June 30, 2024 (see [DA 23-405](#)).

Similarly, a school cannot seek funding for multiple years of an equipment lease. Approved applicants may not seek reimbursement until after the services have been delivered.

******Please see FAQ 9.6a for additional information about the extended service delivery date and the invoice filing deadline applicable to first and second window ECF funding requests and see FAQ 9.6 for information on the service delivery date and the invoice filing deadline applicable to third window ECF funding requests.

2.8 Q: We bought Wi-Fi hotspots in early 2021. Can we request ECF support for the monthly service costs?

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A: Yes. Applicants may request support for the monthly service costs for up to a maximum of 12 months of recurring services delivered within the relevant funding period, but the cost of the Wi-Fi hotspots themselves is not eligible if they were received prior to the start of the relevant funding period.

- Except for a small number of applicants with an extension under [DA 23-405](#), first and second window ECF funding requests, up to a maximum of 12 months of recurring services delivered between July 1, 2021 and June 30, 2023 are eligible (see [DA 22-176](#)).
- For the third window ECF funding requests, up to a maximum of 12 months of recurring services delivered between July 1, 2022 and June 30, 2024 are eligible (see [DA 23-405](#)).

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

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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.

2.12a Q: Can libraries donate ECF devices to patrons with unmet need?

A: Libraries own and must retain ownership of the equipment purchased with ECF support and are subject to the prohibition of resale and of disposing of the equipment for at least three years. They may provide long-term loans of equipment, but must retain ownership of the equipment and are also required to maintain appropriate asset inventories for the ECF-funded equipment.

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: For first and second window ECF funding requests, based on an Order issued February 22, 2022 ([DA 22-176](#)) extending the service delivery date for certain services and equipment, applicants may seek reimbursement for up to a maximum of 12 months of recurring services that will be delivered between July 1, 2021 and June 30, 2023 based on a preexisting contract, if they are being provided to students, school staff, or library patrons with unmet needs. Based on an Order issued May 12, 2023 ([DA 23-405](#)), if the applicant received their funding commitment decision letter or an approved revised funding commitment decision letter for recurring services after July 1, 2022, the service delivery date is 14 months after the date of the letter, or June 30, 2024, whichever is earlier. If the applicant received their funding commitment decision letter or an approved revised funding commitment decision letter for equipment after January 1, 2023, the service delivery date is 180 days after the date of the letter, or June 30, 2024, whichever is earlier.

During the third application filing window, based on an Order issued May 12, 2023 ([DA 23-405](#)), applicants may seek reimbursement for a maximum of 12 months of recurring services that will be delivered between July 1, 2022 and June 30, 2024 based on a preexisting contract, if they are being provided to students, school staff, or library patrons with unmet needs.

******Please see FAQ 9.6a for additional information about the extended service delivery date and the invoice filing deadline applicable to first and second window ECF funding requests and see FAQ 9.6 for information on the service delivery date and the invoice filing deadline applicable to third window ECF funding requests.

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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: How many months of internet services may I seek reimbursement for?

A: For first and second window ECF funding requests, based on an Order issued February 22, 2022 ([DA 22-176](#)) extending the service delivery date for certain services and equipment, first and second window ECF Internet service funding requests will be reimbursed for up to a maximum of 12 months of services delivered between July 1, 2021 and June 30, 2023. Based on an Order issued May 12, 2023 ([DA 23-405](#)), if the applicant received their funding commitment decision letter or an approved revised funding commitment decision letter for recurring services after July 1, 2022, the service delivery date is 14 months after the date of the letter, or June 30, 2024, whichever is earlier, up to a maximum of 12 months of service.

For the third application filing window, based on a Public Notice issued May 12, 2023 ([DA 23-405](#)), third window ECF Internet service funding requests will be reimbursed for up to a maximum of 12 months of services delivered between July 1, 2022 and June 30, 2024. **Please see FAQ 9.6a for additional information about the extended service delivery date and the invoice filing deadline applicable to first and second window ECF funding requests and see FAQ 9.6 for information on the service delivery date and the invoice filing deadline applicable to third window ECF funding requests.

2.16 Q: If ECF-supported equipment is considered obsolete after three years, will applicants be required to sustain the monthly cost of the internet service until a Wi-Fi hotspot reaches the three-year mark?

A: No. There is no FCC requirement that an applicant pay for monthly service for longer than the amount of time for which it has a funding commitment.

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.

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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.

2.20 Q: Should installation and configuration services for a connected device be a separate line item under the “equipment” FRN?

A: The installation and configuration should be requested as a separate line item associated with the funding request for the connected device.

2.21 Q: Is a bundled three-year warranty that includes accidental damage protection eligible?

A: The eligible services list states that “[a] manufacturer’s multi-year warranty for a period of up to three years that is provided as an integral part of an eligible component, without a separately identifiable cost, is also eligible.”

Accidental device protection, or insurance-type warranties, are ineligible. Separately identifiable costs associated with ineligible components will be removed from requests for reimbursement.

2.22 Q: For network construction, will service providers be able to request a one-year extension?

A: Unlike the E-Rate program, there are no exceptions in the ECF program rules allowing USAC to provide service delivery extensions for third-party or self-provisioned networks. If special circumstances warrant it, applicants may file a waiver of the one-year completion date with the FCC.

2.23 Q: In light of the extended service delivery date for eligible equipment, other nonrecurring services, and recurring services requested during the first two application filing windows, do the equipment and/or services still need to be purchased by June 30, 2022, or can the eligible equipment and services be purchased after this date?

A: Eligible equipment, other nonrecurring services, and recurring services that were requested during the first two filing windows may now be purchased after the June 30, 2022 date. However, the eligible equipment and services must be received or delivered by the applicable service delivery date for first and second ECF window funding requests.

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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.

3.2a Q: Can a school keep connected devices and/or hotspots at the school if school is no longer remote?

A: Equipment and services purchased for and used solely at a school or library are ineligible for ECF support. If, however, a school initially distributes the equipment in accordance with the rules (i.e., to satisfy an unmet need and for remote learning) and the equipment is returned during the relevant funding period but before the end of the three-year period after which the item is considered obsolete, the school is permitted to keep the equipment on the school campus without running afoul of program rules. We note, however, that any monthly recurring service cost associated with equipment that has been returned and/or reissued to a student or school staff member without an unmet need and for on-campus use is not eligible for reimbursement through the ECF program. See FAQ 4.6 for more information regarding returned equipment before the end of the relevant funding period and applicable restrictions.

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

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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.

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

4.6 Q: If a school or library's ECF-funded device or hotspot has been provided to a student or school staff member with an unmet need and for remote learning but is later returned during the relevant funding period, is the school or library required to redistribute the device or hotspot to another student, school staff member, or library patron with an unmet need and for remote learning? In what other ways may ECF-funded equipment be utilized after it has been returned by its originally intended user?

A: Schools: If a school initially distributes ECF-funded equipment in accordance with ECF program rules (i.e., to fulfill an unmet need and for remote learning), and the item is later returned during the relevant funding period, the school is not required to redistribute the equipment to satisfy an unmet need and for remote learning purposes. For example, after initially distributing the equipment in accordance with the rules, the school may use the equipment in classrooms, provide the equipment to a student or staff member who does not have an unmet need, or keep the equipment on the school campus while identifying a new unmet need without violating the rules.

Libraries: Unlike schools, if a library purchases and distributes ECF-funded equipment in accordance with ECF program rules (i.e., to fulfill an unmet need and for remote learning), and a library patron returns the item during the relevant funding period and before the end of the three-year period after which the item is considered obsolete, the library must continue to check out or redistribute the equipment to another library patron for whom it would satisfy an unmet need and for remote learning purposes. After the emergency period ends on June 30, 2024, the library is allowed to use the equipment as it deems appropriate, provided it is used for educational purposes. We note that other relevant program rules continue to apply, including the requirement that the library provide each patron with a copy of an eligible use policy explaining that the equipment is intended for library patrons who do not otherwise have access to equipment sufficient to meet the patron's educational needs, and the requirement that the patron sign and return a statement that they would otherwise lack access to equipment sufficient to meet their educational needs if not for the use of the equipment being provided by the library.

Additional requirements for both schools and libraries: We caution schools and libraries that even after equipment is returned, any monthly recurring service costs associated with such returned equipment would no longer be supported by program funds unless the equipment is redistributed to satisfy an unmet need and is for remote learning purposes. The ECF program will not reimburse monthly recurring services associated with returned equipment that is no longer being used for remote learning and to satisfy an unmet need. Applicants must work with their service providers to terminate unused monthly recurring services and are not allowed to seek ECF reimbursement for such unused services. In addition, we remind schools and libraries that all other applicable

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program rules and requirements still apply, including, for example, continuing to comply with the requirement to maintain an asset inventory for each returned item; the requirement that the equipment be provided to a student, school staff member, or library patron; and the requirement that the equipment be used for educational purposes as defined by the rules. Moreover, until the equipment is considered obsolete by program rules, it may not be resold or transferred in consideration of money or any other thing of value, disposed of, donated, or traded.

4.7 Q: Will program rules regarding limitations on the use of ECF-funded equipment continue to apply after the conclusion of the program?

A: After the emergency period ends on June 30, 2024, schools and libraries have the discretion to use eligible equipment as they deem appropriate so long as it is used for educational purposes, remains subject to the three-year prohibition on resale set out in section 54.1713(b), and the school or library complies with the asset inventory requirements set out in section 54.1715 of the Commission's rules.

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 provided to a student, school staff, or library patron.
- 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 provided to a student, school staff, or library patron.

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 limit.

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

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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 the FCC's [Electronic Comment Filing System](#) (ECFS) 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 the time the application filing window closes, 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.

5.8 Q: Are taxes included as part of the \$400 maximum for connected devices?

A: No. Taxes are not included as part of the \$400 cap for connected devices, but reasonable fees are included within the \$400 capped amount.

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

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5.9 Q: Are taxes included as part of the \$250 maximum for Wi-Fi hotspots?

A: No. Taxes are not included as part of the \$250 cap for Wi-Fi hotspots, but reasonable fees are included within the \$250 capped amount.

5.10 Q: Will applicants be reimbursed for the committed \$400 or \$250 per connected device or hotspot if the actual price of the equipment is lower?

A: No. Those are the reasonable support amounts that could be used to apply for funding, but reimbursement will be based on the actual costs of the eligible devices or hotspots. If the reimbursement request is based on an amount that is determined to be greater than the actual or market-based cost of the equipment requested, the request for reimbursement may be reduced or denied because the requested costs may be determined to be unreasonable. The Commission was directed to provide 100% reimbursement of the costs associated of the eligible equipment and services, except for any amounts that the Commission determines to be unreasonable.

Unmet Needs

6.1 Q: How should applicants estimate 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

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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?

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

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: 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)?

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

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. While the FCC has left it up to the applicants what methodology they use to determine actual unmet needs, applicants may be asked to provide documentation to support their actual unmet need after funds have been committed and reimbursement was received. Documentation may include, for example, asset and service inventories that match their unmet need numbers, documentation on how actual unmet need was calculated, etc. See FAQ 8.5 for more information about asset and service inventory lists. However, asset and service inventory lists are not the only way an applicant can demonstrate how it sought reimbursement based only on its actual unmet needs. All applicants must also maintain documentation supporting their compliance with ECF Program rules and certifications, including documentation on how unmet need was calculated, for at least 10 years.

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.

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All applicants should also maintain documentation supporting their compliance with ECF Program rules and certifications. 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: Applicants may only request 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 relevant funding period. 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.

6.14 Q: After submitting an application during the first application filing window, a school or library realizes they need additional equipment and services to meet their students’, school staff’s, or library patrons’ unmet needs. Can the school or library submit another application during the second window to address these unmet needs?

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A: Yes. If a school or library determines there is additional need for eligible equipment and/or services, they may submit another application during a subsequent application filing window to address these unmet needs. However, applicants should not seek support for equipment and services already funded during a prior filing window. Applicants requesting support for similar services or equipment should clearly explain the differences between their requests. See FAQ 7.10.

6.15 Q: Once a funding commitment decision letter has been issued, are there any additional steps that service providers using SPI invoicing should take before starting the services and/or submitting requests for reimbursement?

A: Given that only best estimates of the unmet needs were required at the application stage, service providers are reminded to work with the applicant once the funds have been committed to ensure that they are only seeking reimbursement for the actual number of students and school staff with unmet needs. While there is no requirement in the ECF Program to confirm the start of services before invoicing (like on the FCC Form 486 in the E-Rate Program, for example), service providers and applicants should work together to ensure they are not requesting reimbursement for equipment and/or services that are not needed or not being used. We remind applicants and service providers that requesting extra equipment to account for anticipated damage or loss, or for warehousing, is not allowed under ECF program rules. We also remind applicants and service providers of the one connected device and one hotspot device per student, school staff member, or library patron limit. Applicants and service providers will be responsible for returning funds if it is determined that they are not compliant with ECF program rules.

6.16 Q: My school calculated actual unmet needs for the request for reimbursement forms using the results from the same survey of the technology needs of our students and school staff that we used to estimate unmet needs on the ECF FCC Form 471 application. Is that acceptable?

A: Yes. The applicant is not required to perform a new unmet need survey at the time of submitting the request for reimbursement if the applicant already performed a survey at the time of submitting the application. You can rely on the survey used to determine unmet need for the ECF FCC Form 471 application when calculating both a best estimate and actual unmet need. As a reminder, only best estimates of unmet need are required at the application stage, while actual unmet needs are required at the time the request for reimbursement is submitted. Please also note that the applicant needs to be able to explain how they determined their actual unmet need, and provide supporting documentation (for example, asset and service inventories, and/or information on the survey that was conducted before the ECF funding application was submitted). See FAQ 6.9. This is in addition to the documentation needed to justify reimbursement (e.g., invoices). See FAQ 9.8.

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6.17 Q: If a school or library’s ECF-funded device or hotspot has been provided to a student or school staff member with an unmet need and for remote learning but is later returned during the relevant funding period, is the school or library required to redistribute the device or hotspot to another student, school staff member, or library patron with an unmet need and for remote learning? In what other ways may ECF-funded equipment be utilized after it has been returned by its originally intended user?

A: Schools: If a school initially distributes ECF-funded equipment in accordance with ECF program rules (i.e., to fulfill an unmet need and for remote learning), and the item is later returned during the relevant funding period, the school is not required to redistribute the equipment to satisfy an unmet need and for remote learning purposes. For example, after initially distributing the equipment in accordance with the rules, the school may use the equipment in classrooms, provide the equipment to a student or staff member who does not have an unmet need, or keep the equipment on the school campus while identifying a new unmet need without violating the rules.

Libraries: Unlike schools, if a library purchases and distributes ECF-funded equipment in accordance with ECF program rules (i.e., to fulfill an unmet need and for remote learning), and a library patron returns the item during the relevant funding period and before the end of the three-year period after which the item is considered obsolete, the library must continue to check out or redistribute the equipment to another library patron for whom it would satisfy an unmet need and for remote learning purposes. After the emergency period ends on June 30, 2024, the library is allowed to use the equipment as it deems appropriate, provided it is used for educational purposes. We note that other relevant program rules continue to apply, including the requirement that the library provide each patron with a copy of an eligible use policy explaining that the equipment is intended for library patrons who do not otherwise have access to equipment sufficient to meet the patron’s educational needs, and the requirement that the patron sign and return a statement that they would otherwise lack access to equipment sufficient to meet their educational needs if not for the use of the equipment being provided by the library.

Additional requirements for both schools and libraries: We caution schools and libraries that even after equipment is returned, any monthly recurring service costs associated with such returned equipment would no longer be supported by program funds unless the equipment is redistributed to satisfy an unmet need and is for remote learning purposes. The ECF program will not reimburse monthly recurring services associated with returned equipment that is no longer being used for remote learning and to satisfy an unmet need. Applicants must work with their service providers to terminate unused monthly recurring services and are not allowed to seek ECF reimbursement for such unused services. In addition, we remind schools and libraries that all other applicable program rules and requirements still apply, including, for example, continuing to comply with the requirement to maintain an asset inventory for each returned item; the requirement that the equipment be provided to a student, school staff member, or library

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patron; and the requirement that the equipment be used for educational purposes as defined by the rules. Moreover, until the equipment is considered obsolete by program rules, it may not be resold or transferred in consideration of money or any other thing of value, disposed of, donated, or traded.

Application Process

Note: Please see the “Third Application Filing Window” Tab for specific information about filing third window funding requests.

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: 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.

7.3 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 an application filing window is closed before issuing funding commitment decision notifications.

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

A: Yes. Emergency Connectivity Fund Program application and pricing data will be made available through Open Data. For more information on ECF Open Data resources, please visit <https://www.emergencyconnectivityfund.org/open-data/>.

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

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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.

7.6 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, 2023 as the service end date on an ECF FCC Form 471 submitted during the first two application filing windows or December 31, 2023 as the service end date on an ECF FCC Form 471 submitted during the third application filing window.

****Please see FAQ 9.6a for additional information about the extended service delivery date and invoice filing deadline applicable to first and second window ECF funding requests and see FAQ 9.6 for information on the service delivery date and the invoice filing deadline applicable to third window ECF funding requests.**

7.7 Q: Does a service provider need a Service Provider Identification Number (SPIN) for ECF?

A: No. Service providers do not need to have a SPIN unless they are invoicing on behalf of the applicants.

7.8 Q: How will requests be prioritized?

A: In the event that demand exceeds available funding during any ECF application filing window, funding requests will be prioritized based on an applicant's E-Rate discount rate for Category One services, adjusted to provide a five percent increase for rural schools and libraries. This means that those schools and libraries entitled to a higher E-Rate discount will receive funding ahead of those entitled to a lower discount rate, as reflected in the discount matrix provided in section 54.1708(c) of the ECF rules.

As such, if prioritization is required, for ECF applicants applying in the third window that have a validated E-Rate discount, USAC will rely on the applicant's current Category One E-Rate discount rate (adjusted for rurality, if applicable) based on the number of students eligible for free and reduced lunch through the National School Lunch Program (NSLP) to prioritize the review and processing of ECF applications received in the third application filing window. Applicants were permitted to provide updated information regarding their Category One E-Rate discount rate in the narrative box on their application, as specified below in FAQ 12.3. (This information will be validated as part of the application PIA review process.) For ECF applicants applying in the third window that have not participated in the E-Rate program (and, therefore, do not have a validated E-Rate discount rate), USAC will validate their discount rate during the PIA review process.

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7.9 Q: If a school or library submitted an application during the first application filing window and has not heard from USAC on their funding request by the time the second application filing window opens (e.g., September 28, 2021), should they re-apply for funding in the second window?

A: No. Applicants should not re-file applications that were already submitted in the first application filing window. Submitting duplicate requests may lead to additional delay in the review of applications and will be denied.

7.10 Q: If a school or library submitted an application during the first or second application filing window and has not heard from USAC by the time third application filing window opens, should they re-apply for the portion of services or equipment that they receive after July 1, 2022?

A: No. Applicants should not file new applications during the third application filing window requesting services or equipment that were already requested and still pending during the first or second application filing windows. Submitting duplicate requests may lead to additional delay in the review of applications and will be denied. See FAQ 7.15 for additional information about submitting a request during the third application filing window to continue services funded during the first or second windows. You may also submit a request for additional equipment and/or services, if there is unmet need.

7.11 Q: If I have the credentials to access the ECF Portal, can I begin filling out my application for the third application filing window before the window opens?

A: No. Applicants should not begin completing an ECF FCC Form 471 in the ECF Portal for the third application filing window until the window opens on April 28, 2022.

In the meantime, applicants can learn more about steps that can be taken now to prepare for the second application filing window by reviewing our [Getting Started Guide](#). Additionally, to learn more about the application process, review our [How to Apply Guide](#), or preview the application by visiting USAC's [ECF FCC Form 471 application webpage](#) or watching USAC's [ECF FCC Form 471 walkthrough](#).

7.12 Q: If I filed an application after the first application filing window deadline on August 13, 2021, should I cancel my application and reapply in the second window?

A: No. In accordance with [DA 21-1182](#), USAC will review and process these late-filed applications during the second application filing window in accordance with Program rules and requirements.

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Applicants that certified and submitted their ECF FCC Forms 471 after the close of the initial application filing window on August 13, 2021 will not be required to resubmit their applications during the second application filing window, nor will they need to file a request for waiver of the initial 45-day application filing deadline with the Commission.

7.13 Q: If I filed a waiver request with the FCC for my late-filed application submitted after the first application filing window deadline, should I cancel my waiver request?

A: You can file a request to withdraw the waiver request in the FCC's [Electronic Comment Filing System](#) (ECFS) in WC Docket No. 21-93, referencing the original ECF FCC Form 471 application number.

7.14 Q: What is the funding period for the first and second application filing windows?

A: For most applicants during the first and second application filing windows, based on an Order issued February 22, 2022 ([DA 22-176](#)), applicants could request support for eligible services and equipment received or delivered between July 1, 2021 and June 30, 2023.

On May 12, 2023, the Bureau issued a new Order ([DA 23-405](#)), extending the service delivery date for applicants that received a funding commitment decision letter (FCDL) or an approved revised funding commitment decision letter (RFCDL) more recently. Specifically, if the applicant received an FCDL or RFCDL for recurring services after July 1, 2022, the service delivery date is 14 months after the date of the letter, or June 30, 2024, whichever is earlier. If the applicant received their funding commitment decision letter or an approved revised funding commitment decision letter for equipment after January 1, 2023, the service delivery date is 180 days after the date of the letter, or June 30, 2024, whichever is earlier.

7.14a Q: What is the funding period for the third application filing window?

During the third application filing window, based on an Order issued May 12, 2023 ([DA 23-405](#)), applicants may request support for eligible services and equipment received or delivered between July 1, 2022 and June 30, 2024.

7.15 Q: Can a school or library submit an application in the third application filing window to continue services that were funded through a first or second window funding request?

A: Yes, provided they are not requesting duplicative funding for equipment or services that are committed and were or will be funded through the applicant's first or second window funding requests. To avoid duplicative support and expedite the review of the third filing window applications, applicants should include in the narrative section of the

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ECF FCC Form 471 application information regarding services funded through first or second window requests, including the ECF FCC Form 471 application number(s) and the service end date(s) for any services funded during the first or second window that an applicant is seeking to continue, as well as the up to 12 months of new services being requested.

7.16 Q: Can we request funding for service for all 18 months of the relevant funding period for the third application filing window?

A: No. Applicants may only request support for up to a maximum of 12 months of eligible services during the third application filing window that covers eligible equipment and services. On the ECF FCC Form 471, an applicant should provide the service start and end dates for the 12 months of service that will be requested during that funding period.

7.17 Q: Our school's summer break is coming up. Will there be a "Summer Deferral" Period for PIA inquiries in the ECF Program like there is in the E-Rate Program?

A: No. In the E-Rate Program, USAC provides applicants additional time to respond to requests for information about their FCC Form 471 or other program forms during the summer and winter holiday seasons when schools are not in session. USAC will place forms and requests in a deferred status for E-Rate applicants that do not respond during these times. However, given the emergency purpose of the Emergency Connectivity Fund, there are no seasonal deferral periods in the ECF Program. Applicants should continue checking the ECF Portal for requests for information and respond by the deadline provided. Failure to respond to requests for information may lead to the denial of an application. Updates to holiday and summer contact information can be requested in the ECF Portal at any time by using the "Contact Reviewer" button under the Communications or Related Actions tab.

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

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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);

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(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 applicable service delivery date. However, we encourage applicants and service providers to invoice as soon as feasible after delivery to reduce processing delays near the invoice filing deadlines.

******Please see FAQ 9.6a for additional information about the updated deadline for invoicing applicable to first and second window ECF funding requests and see FAQ 9.6 for information on invoice filing deadline applicable to third window ECF funding requests.

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 in advance for services that have not yet been received.

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

A: Yes. Applicants can submit requests for reimbursement for equipment and/or services they have received before they have paid their 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 the ECF funds and will be required to certify compliance and upload the required verification of payment to the service provider in the ECF Portal. As a reminder, applicants must have received the equipment or services prior to submitting requests for reimbursement, even if they have elected to seek reimbursement before paying their 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?

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A: The Commission did not adopt a hard and fast test, but imposed an obligation on applicants and service providers, who agree to invoice on behalf of applicants, to 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: What is the deadline for filing for reimbursement for funding requests submitted during the third application filing window?

A: On May 12, 2023, the Bureau established June 30, 2024 as the service delivery date for all requests for equipment, other non-recurring services, and recurring services submitted in the third application filing window. Therefore, the invoice filing deadline for third window ECF funding requests is 60 days from the later of the following dates:

- The date of the funding commitment decision letter (FCDL);
- The date of a revised funding commitment decision letter (RFCDL) approving a post-commitment change or a successful appeal of previously denied or reduced funding; or
- The service delivery date.

This also means that all funding requests with a service delivery date of June 30, 2024 have an invoice filing deadline of August 29, 2024, unless the FCDL or the RFCDL is still pending.

Network construction funding requests have a service delivery date of one year after the date of the FCDL.

Please see [DA 23-405](#) for additional information about the service delivery date applicable to third window ECF funding requests. The modified service delivery date rule (section 54.1711(e)) will become effective upon publication of the order in the Federal Register.

9.6a Q: What is the deadline for filing for reimbursement for funding requests submitted during the first and second application filing windows?

A: The invoice filing deadline for first and second window ECF funding requests is 60 days from the later of the following dates:

- The date of the funding commitment decision letter (FCDL);

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- The date of a revised funding commitment decision letter (RFCDL) approving a post-commitment change or a successful appeal of previously denied or reduced funding; or
- The service delivery date.

This means that funding requests with a June 30, 2023 service delivery date have an invoice filing deadline of August 29, 2023.

The Bureau recently extended the service delivery dates for some first and second window applicants in [DA 23-405](#), and the invoice deadline can therefore be later, depending on the service delivery date. Applicants that received a funding commitment decision letter (FCDL) or revised funding commitment decision letter (RFCDL) approving an appeal, waiver, or post-commitment request for a service funding request on or after July 1, 2022:

- Recurring service funding requests have a service delivery date of 14 months after the date of the letter, or June 30, 2024, whichever date is earlier.
- Approved, up-to-12 months of recurring service funding requests associated with an approved special construction request have a service delivery date of June 30, 2024.

Applicants that received an FCDL or RFCDL approving an appeal, waiver, or post-commitment request for an equipment funding request on or after January 1, 2023:

- Equipment funding requests have a service delivery date 180 days after the date of the letter, but not to exceed beyond June 30, 2024.

Network construction funding requests have a service delivery date of one year after the date of the FCDL.

Please see [DA 23-405 and DA 23-406](#) for additional information about the service delivery date applicable to first and second window ECF funding requests.

9.6b Q: If the applicant doesn't start service until after its funding commitment decision letter is approved, can it still receive the 12 months of service requested and approved?

A: For most applicants, yes.

However, on May 11, 2023, the COVID-19 public health emergency expired. As such, under the Act, all purchases must be made by June 30, 2024. Please note that applicants that make purchases before a decision is made do so at their own risk if the decision is ultimately denied. Please see the Sunset Public Notice ([DA 23-406](#)) for more information.

9.6c Q: If an applicant has a pending appeal of a denied funding request that gets approved on February 1, 2023, what is the service delivery date?

A: It depends on the application filing window and service type.

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- If it is a Window 1 or 2 recurring service funding request, the service delivery date is 14 months after the date of the RFCDL, or June 30, 2024, whichever is earlier. In this example, it would be April 1, 2024.
- If it is a Window 1 or 2 equipment funding request, the service delivery date is 180 days after the date of the RFCDL, which would be July 31, 2023.
- If it is a Window 3 equipment or service funding request, the service delivery date is June 30, 2024.

9.6d Q: If an applicant has a pending appeal of a denied funding request that gets approved on April 1, 2023, what is the service delivery date?

A: It depends on the application filing window and service type.

- If it is a Window 1 or 2 recurring service funding request, the service delivery date is 14 months after the date of the RFCDL, or June 30, 2024, whichever is earlier. In this example, it would be June 1, 2024.
- If it is a Window 1 or 2 equipment funding request, the service delivery date is 180 days after the date of the RFCDL, which would be September 28, 2023.
- If it is a Window 3 equipment or service funding request, the service delivery date is June 30, 2024.

9.6e Q: If an applicant has a pending appeal of a denied funding request that gets approved on August 1, 2023, what is the service delivery date?

A: It depends on the application filing window and service type.

- If it is a Window 1 or 2 recurring service funding request, the service delivery date is 14 months after the date of the RFCDL, or June 30, 2024, whichever is earlier. In this example, it would be June 30, 2024.
- If it is a Window 1 or 2 equipment funding request, the service delivery date is 180 days after the date of the RFCDL, which would be January 28, 2023.
- If it is a Window 3 equipment or service funding request, the service delivery date is June 30, 2024.

9.6f Q: If an applicant has a pending Window 3 funding request (e.g. with a discount rate that has not been funded) that is approved in November 2023, what is the service delivery date?

A: The service delivery date for all recurring, non-recurring, and equipment Window 3 funding requests is June 30, 2024, regardless of when the funding decision is made.

9.7 Q: If the service provider is invoicing on behalf of the applicant, does it need a SPIN number for ECF?

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A: Yes.

9.8 Q: What should an applicant or service provider submit along with a request for reimbursement (ECF FCC Form 472/474)?

A: Each request for reimbursement must be accompanied by a vendor invoice supporting the amount requested. Vendor invoices must include the level of detail needed for USAC to validate the following information during its review of this supporting documentation.

- A date of the service for non-recurring charges, or a bill date for recurring charges that is consistent with what was entered on the ECF FCC Form 472/474.
- A date of the service or bill that is acceptable based on the relevant funding period.
- The equipment or services provided are the same as what was approved on the ECF FCC Form 471 (unless modified pursuant to an approved post-commitment change), and are at or below the price approved on the ECF FCC Form 471.
- The service provider who provided the equipment or services is the same as the service provider approved on the ECF FCC Form 471 (unless modified pursuant to an approved post-commitment change).
- The date that the service or equipment is delivered or shipped.

9.8a Q: What should I do if the vendor invoice that I am submitting with a request for reimbursement does not contain a delivery/shipped date?

A: We encourage applicants to work with their service providers to ensure delivery information is included on the invoice. However, if a vendor invoice does not include a delivery or shipped date, supporting documentation that demonstrates that the equipment or services have been delivered or shipped (e.g., a packing slip or other proof of delivery) can be uploaded to expedite the review of the reimbursement request. The supporting documentation must be consistent with the timing of the delivery date on the request for reimbursement form.

9.9 Q: Can a school or library submit a reimbursement request after it has received the ECF-supported equipment but before it distributes the equipment to their students, school staff, or library patrons?

A: Yes. While the school or library must have received the equipment or services prior to submitting their request for reimbursement and must certify to this on the ECF FCC Form 472, they can seek reimbursement before distributing the equipment or services to students, school staff members, or library patrons with an unmet need.

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Applicants and service providers are also reminded of the need to certify on their reimbursement requests (ECF FCC Forms 472/474) that they are not willfully or knowingly requesting reimbursement for equipment or services that are not being used.

9.10 Q: Our service provider delivered the eligible equipment earlier than we requested. What should we do if the equipment for which we are seeking reimbursement was delivered before the start date of the relevant funding period?

A: If an applicant receives the equipment and/or services prior to the start date of the relevant funding period (July 1, 2021 for the first and second application filing windows or July 1, 2022 for the third application filing window), they may seek a waiver of the FCC's rules to be able to seek reimbursement for that equipment and/or services. Applicants seeking a waiver should include a brief description of the issue including information about order and delivery timing. For more information on submitting a waiver request with the FCC, please review the [Emergency Connectivity Fund website](#).

9.11 Q: Our request for reimbursement was denied because we accidentally missed requests for additional information from USAC. What can we do now?

A: Applicants or service providers whose requests for reimbursement are denied because the party did not respond to USAC's request for information or provide the correct documentation may re-submit the request for reimbursement for the eligible equipment and/or services up until the invoice filing deadline. We encourage parties who are re-submitting their requests for reimbursement to include any previously requested information or documentation along with the re-filed form. Please review FAQs 9.8 and 9.8a for information and documentation to include with the request for reimbursement to prevent repeated delays in the processing of the re-filed request(s).

9.12 Q: What must applicants or service providers, who agree to invoice on behalf of applicants, do to be compliant with the non-usage certification?

A: The Commission declined to adopt specific non-usage rules for the ECF Program. Instead, applicants and service providers are required to certify on the request for reimbursement that they are not willfully or knowingly requesting reimbursement for services and equipment that are not being used. See 47 CFR § 54.1711(a)(1)(viii), (a)(2)(vi). While the ECF program only funds equipment and services that are in use, there may be certain circumstances (e.g., during a school's summer break, sick days) where the services would still be eligible for ECF support. ECF participants should take reasonable actions to monitor and track the usage of equipment and services that are purchased and used through the ECF program. For example, the Report and Order suggested that applicants could ask their service providers to provide monthly reports or other information on data use as one way to comply with the certification. ECF participants can take other reasonable steps, such as ensuring a hotspot device is activated. ECF participants should be prepared to explain what actions were taken, if asked how they complied with the non-usage certification during an audit or other post-

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commitment review. We remind applicants and service providers that they may not knowingly and willfully invoice the ECF program for equipment and services that are not being used and if such non-usage is determined, the funds may be recovered from one or both parties.

9.12a Q: If a service provider discovers that funded equipment and/or services are not being used, should they automatically allocate those costs from their requests for reimbursement and bill the applicant directly for this non-usage?

A: If a service provider determines that there is non-usage, we strongly encourage them to notify the school or library and provide a reasonable period of time (e.g., 30 days) to allow the school or library to reach out to the student, school staff member, or library patron to determine if the service is no longer needed. The ECF Program rules do not require the applicant and/or service provider to immediately remove the equipment/services provided to the student, school staff member, or library patron from their ECF requests for reimbursement, but do require that they take reasonable actions to monitor and track usage, which includes providing the school or library notice and time to first address the non-usage issue. We remind applicants and service providers that they may not knowingly and willfully invoice the ECF program for equipment and services that are not being used (see 47 CFR § 54.1711(a)(1)(viii), (a)(2)(vi)) and if such non-usage is determined, the funds may be recovered from one or both parties.

9.13 Q: I submitted a request for reimbursement in the ECF program, but it is taking longer to process than requests for reimbursement I've submitted in the E-Rate program. Why is it taking longer?

A: The review and processing times for requests for reimbursement submitted in the ECF and E-Rate programs vary. The ECF program is an appropriated program and the review and processing of ECF requests for reimbursement entails more steps and, in some cases, further review than in E-Rate. For example, after USAC has recommended approval for an ECF request for reimbursement, the request is approved and processed as part of a batch by the Commission and the disbursement is made through the U.S. Department of Treasury. If you have any questions about the status of your ECF request for reimbursement, please contact the Customer Support Center at 1-800-234-9781.

9.14 Q: Once a funding commitment decision letter has been issued, are there any additional steps that service providers using SPI invoicing should take before starting the services and/or submitting requests for reimbursement?

A: Given that only best estimates of the unmet needs were required at the application stage, service providers are reminded to work with the applicant once the funds have been committed to ensure that they are only seeking reimbursement for the actual number of students and school staff with unmet needs. While there is no requirement in the ECF Program to confirm the start of services before invoicing (like on the FCC Form

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486 in the E-Rate Program, for example), service providers and applicants should work together to ensure they are not requesting reimbursement for equipment and/or services that are not needed or not being used. We remind applicants and service providers that requesting extra equipment to account for anticipated damage or loss, or for warehousing, is not allowed under ECF program rules. We also remind applicants and service providers of the one connected device and one hotspot device per student, school staff member, or library patron limit. Applicants and service providers will be responsible for returning funds if it is determined that they are not compliant with ECF program rules.

Children's Internet Protection Act

****Note: A number of these FAQs have been revised for clarity on the scope of CIPA requirements, most recently on 9/24/21. Please also review this [flowchart](#) for determining whether CIPA compliance is required for any school- or library-owned computers.***

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) when the school or library receives (1) ECF or E-Rate support for internet access, internet services, or network equipment for internet access or internet service that will be used by any school- or library-owned computers; or (2) E-Rate support for internal connections or network equipment for internal connections that will be used by any school- or library-owned computers.

We correct an earlier version of this FAQ to make clear that while CIPA does not impose any requirements on a Wi-Fi hotspot device itself, the purchase of a Wi-Fi hotspot through ECF would qualify as the purchase of network equipment for internet access, internet service, or internal connections, and would trigger CIPA compliance for the purchasing school or library only if it is used by any school- or library-owned 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 school- or library-owned computers, including those laptop computers or tablet computers purchased with ECF support, if the purchasing entity does not also receive (1) ECF or E-Rate discounted internet access, internet services, or network equipment for internet access or internet service that will be used by any computers owned by a school or library; or (2) E-Rate discounted internal connections or network equipment for internal connections that will be used by any computers owned by a school or library.

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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 if the school or library receives (1) ECF- or E-Rate-supported internet access, internet services, or network equipment for internet access or internet service that will be used by any school- or library-owned computers; or (2) E-Rate-supported internal connections or network equipment for internal connections that will be used by any school- or library-owned computers.

However, CIPA requirements do not apply to a school or library whose computers do not use any (1) ECF- or E-Rate-supported internet access, internet services or network equipment for internet access or internet service; or (2) E-Rate-supported internal connections or network equipment for 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.

10.4a Q: Do CIPA requirements apply to a school's or library's existing computers if the school or library is seeking ECF-support to provide broadband services to its students', school staff members', or library patrons' homes for use only in conjunction with computers and devices the students, school staff or library patrons own?

A: No. If a school or library purchases eligible services, access, or network equipment through the ECF Program to be used only by student-, school staff- or library patron-owned computers and not by school- or library-owned computers, then the purchase does not trigger CIPA requirements for any school- or library-owned computers.

10.5 Q: Will applicants be required to certify CIPA compliance on their ECF application if they have already certified to CIPA compliance for FY 2021 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 E-Rate Program 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.

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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 (1) that CIPA does not apply; (2) that its devices are in compliance with CIPA requirements; or (3) that it is undertaking the actions necessary to comply with CIPA requirements. See questions 10.1 - 10.4a for more details.

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 after the relevant funding period ends, the school or library begins paying for the services on its own?

A: A school or library must be in compliance with CIPA while it receives (1) ECF or E-Rate discounted internet access, internet services, or network equipment for internet access or internet service that will be used by any school- or library-owned computers; or (2) E-Rate discounted internal connections or network equipment for internal connections that will be used by any computers owned by a school or library. For example, if a school or library is receiving ECF-supported internet services that are used by any computers owned by the school or library until June 30, 2022, then all school- or library-owned computers must be CIPA compliant during that term. In this example, after June 30, 2022, CIPA compliance is not required for the school's or library's computers if the school or library no longer receives (1) ECF or E-Rate discounted internet access, internet services, or network equipment for internet access or internet service that will be used by any school- or library-owned computers; or (2) E-Rate discounted internal connections or network equipment for internal connections that will be used by any computers owned by a school or library.

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

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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 Affordable Connectivity Program (ACP) 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 ACP 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.

11.3 Q: Can a school or library submit an application in the third application filing window to continue services that were funded through a first or second window funding request?

A: Yes, provided they are not requesting duplicative funding for equipment or services that are committed and were or will be funded through the applicant's first or second window funding requests. To avoid duplicative support and expedite the review of the third filing window applications, applicants should include in the narrative section of the ECF FCC Form 471 application information regarding services funded through first or second window requests, including the ECF FCC Form 471 application number(s) and the service end date(s) for any services funded during the first or second window that an applicant is seeking to continue, as well as the up to 12 months of new services being requested.

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

FAQ updated 9/30/24

Third Application Filing Window

Note: Please see the “Application Process” Section for additional frequently asked questions that may be helpful to third window applicants.

12.1 Q: If demand in the third application filing window exceeds available funding, how will funding requests be prioritized?

A: In the event that demand exceeds available funding during any ECF application filing window, ECF funding requests will be prioritized based on an applicant's E-Rate discount rate for Category One services, adjusted to provide a five percent increase for rural schools and libraries. This means that those schools and libraries entitled to a higher E-Rate discount rate will receive funding ahead of those entitled to a lower discount rate, as reflected in the discount matrix provided in section 54.1708(c) of the ECF rules.

As such, if prioritization is required, for ECF applicants applying in the third window that have a validated E-Rate discount, USAC will rely on the applicant's current Category One E-Rate discount rate (adjusted for rurality, if applicable) based on the number of students eligible for free and reduced lunch through the National School Lunch Program (NSLP) to prioritize the review and processing of ECF applications received in the third application filing window. Applicants were permitted to provide updated information regarding their Category One E-Rate discount rate in the narrative box on the their third window application, as specified below in FAQ 12.3. (This information will be validated as part of the application PIA review process.) For ECF applicants applying in the third window that have not participated in the E-Rate program (and, therefore, do not have a validated E-Rate discount rate), USAC will validate their discount rate during the PIA review process.

12.2 Q: What if my school or library does not have a validated E-Rate discount because I don't participate in the E-Rate program?

A: If your school or library does not have a validated E-Rate discount, please be prepared to respond quickly to requests to validate a discount rate, including providing documentation to support the discount rate. Failure to respond promptly could result in your ECF application not being reviewed.

12.3 Q: Due to the pandemic, we have not needed to update our NSLP data in recent year(s) for the E-Rate Program, and our NSLP percentage has increased. Can we update student enrollment or NSLP numbers for the purposes of the third application filing window?

A: If you want to update your student counts and NSLP data because your NSLP percentage has increased, please provide that information in the narrative box for the first funding request number (FRN) on your third window ECF FCC Form 471.

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

Specifically, updates should be noted using the following language: “NSLP Update Request: updated NSLP student count xxx; updated student count xxx; and updated NSLP percentage xx%.”

This will allow USAC to quickly find the ECF applications that include NSLP updates during the third application filing window. USAC will need to validate any changes made to an applicant’s student count and NSLP student count numbers so please ensure you have the documentation needed to validate these requested changes. Updates may not be considered if applicants fail to respond promptly to requests for validation, and USAC may rely instead on existing NSLP percentages.

12.4 Q: Can I apply for ECF support in the third application window if I already received support in one of the first two application windows?

A: Yes. However, applicants may not request duplicative funding for equipment or services that are committed and were or will be funded through the applicant’s first or second window funding requests. To avoid duplicative support and expedite the review of the third filing window applications, applicants should include in the narrative section of the ECF FCC Form 471 application information regarding equipment and/or services funded through first or second window requests.

Please see FAQs 12.4a, 12.5 and 12.8 for additional instructions on what specific information about your first or second window funding request to include in the narrative of a third window funding request.

12.4a Q: Can a school or library submit an application in the third application filing window to continue services that were funded through a first or second window funding request?

A: Yes, provided they are not requesting duplicative funding for equipment or services that are committed and were or will be funded through the applicant’s first or second window funding requests.

To avoid duplicative support and expedite the review of the third filing window applications, applicants should include in the narrative section of the ECF FCC Form 471 application information regarding services funded through first or second window requests, including the ECF FCC Form 471 application number(s) and the service end date(s) for any services funded during the first or second window that an applicant is seeking to continue, as well as the service delivery dates for up to 12 months of new services being requested through the third window ECF FCC Form 471 (see [DA 22-309](#)).

Please see FAQs 12.5 & 12.6 below for more information about the specific information and language that should be included in the narrative section of third window ECF FCC Form 471 applications for continuing or new recurring services.

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12.5 Q: What information should we include in our third window ECF FCC Form 471 application if we are requesting to continue receiving services funded through a committed first or second window funding request?

A: If you are continuing to receive recurring services between July 1, 2022 through June 30, 2023 (see [DA 22-176](#)) based on existing ECF commitments, you will need to include the following information about your first or second window funding request in the narrative box for each applicable FRN on a third window ECF FCC Form 471: “Continuing First or Second Window Recurring Service Request: ECF FCC Form 471 Application No.; FRN; Service Start Date; and Service End Date.”

You will also need to include the following information about the future recurring services being requested in the narrative box for each applicable FRN on a third window ECF FCC Form 471: “New Third Window Recurring Service Request: ECF FCC Form 471 Application No.; FRN, Service Start Date; and Service End Date.”

Note: You may not request duplicative support and may only request up to a maximum of 12 months of recurring service to be received. If you will be pausing service, for example, during the summer months, you will need to provide the months of service you are seeking support for based on these existing ECF commitments or the third window ECF funding request. Please also see FAQ 12.7.

12.6 Q: What information should we include in our third window ECF FCC Form 471 application if we are requesting new recurring services for the funding period of the third application filing window?

A: In the third application filing window, you will need to include the following information in the narrative box for each applicable FRN on a third window ECF FCC Form 471: “New Third Window Recurring Service Request: ECF FCC Form 471 Application No.; FRN, Service Start Date; and Service End Date.”

Note: You may only request up to a maximum of 12 months of recurring service to be received. If you will be pausing service, for example, during the summer months, you will need to provide the months of service you are seeking support for based on the third window ECF funding request. Please also see FAQ 12.7.

12.7 Q: Our school usually pauses recurring services during the summer months when it is not in session. If we plan to pause services, can we still request ECF support for nonconsecutive months during the relevant funding period?

A: Yes. If a school or library will be pausing service, for example, during a school's summer break, they will need to provide the specific months of service they are seeking ECF support for based on the relevant ECF funding request (i.e., committed first or second window funding request or third window funding request). Applicants will need to include this information in the narrative box for each applicable FRN. Applicants are

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reminded that they cannot seek duplicative support and can only seek support for up to a maximum of 12 months of recurring service during the third application filing window. Please also see FAQs 12.5 and 12.6.

12.8 Q: Can a school or library request funding in the third application filing window to replace lost or damaged devices funded by first or second window funding requests?

A: Yes. Schools and libraries with students, school staff or library patrons without access to a device (due to it being lost or damaged) must be able to certify that they are only seeking support for devices provided to students/school staff/library patrons that would otherwise lack access to connected devices sufficient to engage in remote learning on the ECF application submitted during the third window. Schools and libraries should carefully document how the devices are not duplicative in their asset inventories, and the asset inventories should include the date the school or library was notified that the device was lost or damaged. Applicants are encouraged to use the narrative box of their third window applications to explain such requests and should note that they are not requesting additional devices to account for anticipated breakage or loss of devices requested during the third application filing window, which is not permitted.

12.9 Q: How is the discount rate calculated for consortia applicants with a mix of urban and rural members?

A: Consortia applicants calculate their discount rates using a simple average of the ECF discount rates of the consortium members included on the application.

12.10 Q: Should applicants cancel or reduce ECF funding commitments, if they do not end up using all of the committed amount (e.g., applicant requested and received a commitment to purchase 500 laptops, but only purchased 400)?

A: Yes, we encourage applicants to file a Post-Commitment Request to cancel or reduce the amount of their ECF funding commitment(s) if they do not need or use the full commitment amount. This will allow the Commission to de-obligate the ECF funds more quickly and make the funds available to applicants who submitted requests in the third ECF application filing window.

Please visit USAC's Emergency Connectivity Fund website for additional information about submitting a Post-Commitment Request for [applicants](#) and [service providers](#).

Post-Commitment

Please visit USAC's Emergency Connectivity Fund website for additional information regarding the Post-Commitment Request process for [applicants](#) and [service providers](#). Applicants with questions or concerns about a committed funding request should

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FAQ updated 9/30/24

contact the Emergency Connectivity Fund Customer Support Center (CSC) at (800) 234-9781 or use the external communications tab in the ECF Portal.

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

A: Yes, applicants may change service providers. After a funding commitment decision letter (FCDL) has been issued, you will need to submit a request to change the service provider through a Post-Commitment Request Form in the ECF Portal.

* This was previously FAQ 7.2.

13.2 Q: How can I change the service provider or the make or model of equipment after I've received a funding commitment decision letter (FCDL)?

A: After an FCDL has been issued, you will need to submit a request to change the service provider or the equipment and/or service through a Post-Commitment Request Form in the ECF Portal.

* This was previously FAQ 9.10.

13.3 Q: Can I request to increase my funding amount if I have already received an FCDL?

A: No. Once a funding commitment has been issued, any post-commitment requests to increase the funding amount for a committed funding request will be dismissed.

* This was previously FAQ 9.11.

13.4 Q: Should applicants cancel or reduce ECF funding commitments, if they do not end up using all of the committed amount (e.g., applicant requested and received a commitment to purchase 500 laptops, but only purchased 400)?

A: Yes, we encourage applicants to file a Post-Commitment Request to cancel or reduce the amount of their ECF funding commitment(s) if they do not need or use the full commitment amount. This will allow the Commission to de-obligate the ECF funds more quickly and make the funds available to applicants who submitted requests in the third ECF application filing window.

Single Audit Act

14.1 Q: What is the Single Audit Act?

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FAQ updated 9/30/24

A: The [Single Audit Act](#) requires an annual audit of non-Federal entities, including Tribes, that expend \$750,000 or more of federal financial assistance in a fiscal year. See 2 CFR § 200.501. The Single Audit must be performed by an independent auditor.

14.2 Q: If I receive funding through the Emergency Connectivity Fund am I subject to the Single Audit Act requirements?

A: If you expend \$750,000 or more in federal financial assistance during a fiscal year, including amounts reimbursed by the ECF program, you are subject to the Single Audit Act requirements. These requirements include preparing a Schedule of Expenditures of Federal Awards (SEFA), among other things. See 2 CFR § 200.510(b).

14.3 Q: Does Emergency Connectivity Fund program funding need to be reported on the Schedule of Expenditures of Federal Awards (SEFA) pursuant to [OMB Uniform Guidance](#) requirements?

A: Yes, ECF program beneficiaries that receive ECF funding commitments are required to report ECF program funds on SEFA forms. The Catalog of Federal Domestic Assistance (CFDA) number for the ECF program is 32.009.

14.4 Q: If we are required to report ECF program funds on our SEFA forms, which ECF program funds should we include on the SEFA?

A: ECF program beneficiaries should include the total expenditures that have been reimbursed by the ECF program during the relevant period. In other words, the total amount that has been reimbursed by the ECF program during the relevant period should be reported on the SEFA.

14.5 Q: What happens once an auditor completes a Single Audit Act report?

A: The data collection form and reporting package must be uploaded to the Federal Audit Clearinghouse within 30 days after your entity received the audit report or 9 months from the end of your entity's fiscal year, whichever occurs first. See 2 CFR § 200.512.

14.6 Q: What will the Commission do once the Single Audit Act report is uploaded into the Federal Audit Clearinghouse?

A: The Commission will first issue an acknowledgement letter if there is a finding identified related to the Emergency Connectivity Fund program (CFDA 32.009) in your Single Audit Act report. The acknowledgement letter will also outline the steps for resolving any identified finding(s).

14.7 Q: What should I expect next?

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A: Consistent with its responsibilities under the Single Audit Act, the Commission will review the auditor's finding(s) and issue a management decision letter (MDL), which will state whether the audit finding(s) is sustained and the reason for the decision, among other things. See 2 CFR § 200.521. If more information is needed prior to issuing the management decision letter, you may receive a request from the Commission or the program administrator, the Universal Service Administrative Company (USAC), to provide information related to the audit finding(s), as well as for documentation regarding any subsequent corrective actions. Once the Commission has had an opportunity to review all relevant documentation, it will issue a MDL (see below), which will include information regarding any potential financial recovery or other corrective actions, and that such action(s) will be appealable.

If the Commission sustains the auditor's finding(s) and recovery of some or all of the funds is warranted, USAC will issue a separate Commitment Adjustment (COMAD) letter after the issuance of the MDL. The COMAD letter will explain that the funds have been disbursed in error and that USAC is required to seek recovery of the improperly disbursed funds. The COMAD letter will also provide information regarding how to appeal the recovery decision. Pursuant to § 54.1718(b) of the Commission's rules, program participants have 30 days from the date of the COMAD letter to appeal the decision. Please note that the MDL is not an appealable decision. Further information regarding the COMAD process can be found on [USAC's website](#).

14.8 Q: What is a management decision letter?

A: A MDL serves as the Commission's official written response to the ECF-related findings contained in the Single Audit Act audit report, identifying whether the Commission agrees with the auditor's finding(s) and the basis for its decision, among other things. MDLs will be shared with both the auditee and the auditor. If the auditee has not yet completed the corrective action specified in the report, a timetable for follow-up may be provided, as well as a description of any other corrective action deemed appropriate.

14.9 Q: I'm aware that other schools have already received a management decision letter. Why is mine taking so long?

A: Single Audit Act audit reports are received through the Federal Audit Clearinghouse on a rolling basis depending on when auditors have completed their audit and when program participants are required to upload their reports to the site. As such, the Commission's review of these audit reports occurs on a rolling basis, and MDLs are generally issued within six months of receiving the audit report.

There are a number of reasons why some management decision letters may be issued quicker than others. One key reason is that some entities' audit reports may have been uploaded in the Federal Audit Clearinghouse earlier than others and the Commission was able to resolve them sooner. In addition, some audit reports may present more

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complex factual circumstances and findings, some of which may warrant the Commission or USAC to request additional information related to the audit finding(s) from the auditee. Moreover, the Commission endeavors to review Single Audit Act findings holistically to ensure ECF program participants are treated in a consistent and fair manner, which can add time to the review process and the issuance of MDLs. Auditees can assist with the timely resolution of any audit finding(s) by responding promptly to any requests for additional information.

14.10 Q: Will I have to pay back the funds my school or library received through the Emergency Connectivity Fund?

A: The Commission is committed to resolving Single Audit Act-related findings in a fair and equitable manner, recognizing that the Emergency Connectivity Fund was an emergency program, while also protecting the integrity of the program and the limited funds. Depending on the scope and severity of any audit finding(s), there is a wide range of potential corrective actions that auditees may face. Corrective actions could be limited to implementation of a corrective action plan, may include an opportunity to cure any deficiencies, or could result in a financial recovery, if required, that is commensurate with the scope of the violation(s). Auditees will have an opportunity to appeal any adverse decision pursuant to 47 CFR § 54.1718 of the Commission's rules.

14.11 Q: If an auditee demonstrates that an auditor's finding is inaccurate, how will the Commission treat that finding? Will the MDL indicate that such a finding is not sustained?

A: The FCC will review the auditor's findings for each auditee to determine whether the findings are accurate and whether they should be sustained, and issue a Management Decision letter within six months of receiving the audit report. If, during the course of the FCC's review of the auditor's findings, an auditee is able to show that the auditor's findings are inaccurate, the FCC would likely not sustain the findings and, pursuant to 2 CFR § 200.521, would state as such in its management decision. To the extent an audit finding or the basis for that find is unclear, auditors and/or auditees may receive outreach from USAC or the FCC seeking additional information that would be incorporated into the management decision.

14.12 Q: What happens if the Commission does not sustain a finding?

A: If the Commission does not sustain a finding, it is our understanding that the finding would be considered resolved, and there would not be any additional actions the auditee would be required to take regarding that particular finding.

14.13 Q: Is an auditee not considered a low-risk auditee in the upcoming audit year if there were findings related to internal control deficiencies, modified opinions, and/or questioned costs in the prior year?

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A: An auditee must qualify as a low-risk auditee if it meets the criteria set out in 2 CFR § 200.520. However, the rule does not state that the auditee would automatically qualify as a high-risk auditee if this criteria was not met. Thus, we cannot opine at this time whether an auditor may change an auditee's low-risk status for the upcoming audit year pursuant to 2 CFR § 200.520.

14.14 Q: Where can auditors and auditees find guidance regarding compliance with the ECF program rules?

A: The Commission regularly issues guidance regarding ECF program rules and requirements—including information regarding Single Audit Act ECF program audits—through orders, public notices, USAC News Briefs, and Frequently Asked Questions. The Commission adopted rules for the ECF program in its May 10, 2021 Report and Order: *Establishing Emergency Connectivity Fund to Close the Homework Gap*, WC Docket Nos- 21-58, 21-93 Report and Order, 36 FCC Rcd 8696 (2021). The Report and Order is available at <https://docs.fcc.gov/public/attachments/FCC-21-58A1.pdf>. The rules for the ECF program are available at [47 CFR sections 54.1700 et seq.](#)

Program information is also available at <https://www.fcc.gov/emergency-connectivity-fund>, including FAQs about the ECF program and links to FCC Orders and Public Notices. Additional information, including trainings and newsletters related to the program, is also available at <https://www.emergencyconnectivityfund.org/>.

In addition, the Commission works with the Office of Management and Budget (OMB) on an annual basis to update the Single Audit Act Compliance Supplement, the purpose of which is to assist auditors in conducting Single Audit Act audits of the program. The 2023 Compliance Supplement can be found at <https://www.whitehouse.gov/wp-content/uploads/2023/05/2023-Compliance-Supplement-%E2%80%932-CFR-Part-200-Appendix-XI.pdf>. Annual revisions to the compliance supplement are made based on the observations and lessons learned by FCC staff, as well as conversations with Single Audit Act auditors and ECF program participants, and observations from other auditors, including FCC auditors. The 2024 Compliance Supplement is expected to be released by OMB in May 2024.

Single Audit Act auditors are also permitted to reach out to relevant federal agencies to ask questions about OMB's compliance supplement or the rules for the federal program, and the FCC will provide additional guidance as requested.

14.15 Q: Is there additional guidance for auditors and auditees for 2023 or 2024 audits?

A: The FCC does not intend to require auditors to test the following in 2024 audits†:

Procurement: Under the ECF program rules, applicants must certify that they have complied with all applicable state, local, or tribal procurement laws (see 47 CFR §

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54.1703). However, the FCC has not codified the procurement standards set forth in Subpart D (2 CFR §§ 200.317 - 200.327) and, as a result, has determined that it is unnecessary for auditors to review these policy requirements for the ECF program.

Suspension and Debarment: The FCC has applied its own rules (47 CFR § 54.8) for suspension and debarment to the ECF program. The OMB guidelines for suspension and debarment (e.g., 2 CFR § 180.300) have not been codified by the FCC and the FCC has similarly determined that it is unnecessary for auditors to review these policy requirements for the ECF program.

Eligible Entities: The eligibility of an entity for the ECF program is determined by USAC consistent with the requirements set forth in 47 USC §§ 254(h)(4), (7), and 47 CFR § 54.1700. The FCC has determined that it is unnecessary for auditors to test for eligibility when the determination is made by USAC prior to the commitment and distribution of ECF program support.

Although these specific updates were not included in the 2023 Compliance Supplement, as the above-referenced policy requirements were not codified for the ECF program, it is unnecessary for auditors to review in the ongoing 2023 audits. Similarly for eligibility, as USAC has determined the eligibility consistent with the requirements set forth in 47 USC §§ 254(h)(4), (7), and 47 CFR § 54.1700 prior to the commitment and disbursement of ECF program support, the FCC has determined that it is not necessary for auditors test eligibility in the ongoing 2023 audits.

†We note that the 2024 Compliance Supplement has not yet received final approval from OMB at the time of this FAQ's posting and may be subject to change following publication.

Congressional Funding Rescission

In Section 639 of Title VI, *General Provisions – This Act (Including Rescission of Funds)* of Division B—*Financial Services and General Government Appropriations Act, 2024*, contained in the [Further Consolidated Appropriations Act, 2024](#), Congress enacted a rescission of funds from the Emergency Connectivity Fund (ECF) program. Specifically, Congress provided in section 639 that “[o]f the unobligated balances of amounts made available under section 7402(c)(2)(A) of the American Rescue Plan Act of 2021 (Public Law 117-2), \$1,768,000,000 are hereby rescinded not later than September 30, 2024.” *Id.*

Because of this rescission, the FCC is constrained in its ability to make changes to existing funding commitments and in obligating new funds for any reason, including to resolve an appeal or waiver request.

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

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We recognize that this law may result in funding challenges for ECF applicants and service providers. Please review the FAQs posted below and contact us if you have further questions.

We encourage all program participants to file all remaining forms related to their ECF funding requests as soon as feasible, including filing any necessary post-commitment requests and invoice reimbursement requests. If a participant knows that it will not be seeking reimbursement, we also recommend reducing or cancelling any unused ECF funding commitments.

15.1 Q: What does the language in the Congressional government funding bill mean for the ECF program?

A: The government funding bill passed in March 2024 rescinds \$1.768 billion from the ECF program. This means that Congress has canceled part of the Commission's budget authority for the ECF program as a measure to reduce government spending. The FCC cannot make any new commitments from ECF funding until the rescission is satisfied and the full \$1.768 billion is returned by the FCC to the U.S. Treasury.

15.2 Q: What is a commitment and an obligation?

A: When USAC issues a funding commitment decision letter, the funding is committed for the services and equipment based on the terms of the letter (i.e., named service provider, dates, types of equipment and services). At the same time, the FCC records an obligation in its books and records pursuant to the Recording Act, 31 U.S.C. § 1501.

15.3 Q: What impacts does rescission of unobligated funding have on ECF applicants and service providers?

A: In addition to requiring the FCC to return uncommitted funds, the rescission means that the FCC cannot make new commitments in the course of administering the ECF program. Because of the way that the obligation process occurs, the FCC and USAC are therefore prevented by the March 23, 2024 law from: processing post-commitment requests to change service providers or invoicing methods; approving a commitment if an appeal or waiver is granted; or making upward commitment adjustments to resolve errors.

The following types of post-commitment requests will continue to be processed (as long as there is no increase in the committed amount) because they do not change the recorded obligation: service start and end dates; unique entity identifier (UEI) and taxpayer identification number (TIN) changes; service/equipment substitutions; commitment reductions and cancellations, and recovery of funds. Post-commitment requests with currently prohibited changes cannot be processed at this time.

15.4 Q: Will I need to return ECF disbursements I've already received?

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A: No. The rescission does not impact previously obligated and disbursed ECF funds. Nor does the rescission impact our ability to reduce a commitment and/or to recover improperly disbursed funds. Program participants may also continue to voluntarily return funds if needed.

15.5 Q: If I already have a funding commitment, can I continue to submit invoices?

A: Yes. The rescission does not impact prior funding commitments with unexpired invoice filing deadlines. (We note many ECF funding requests had August 29, 2024 as the invoice filing date, which has now expired.) Program participants may submit invoices for eligible equipment and services purchased by June 30, 2024, the program's sunset date, and USAC may process invoices so long as the invoice filing deadline has not passed for that funding request. However, certain changes (such as a request to change service providers or invoicing methods) are prohibited even with an existing funding commitment and an unexpired invoice filing deadline. See FAQs 15.3; 15.8.

15.6 Q: Are there any pending applications that will be affected?

A: No. All ECF funding applications submitted have been reviewed and processed (i.e., funded, cancelled, or denied).

15.7 Q: What happens if I have an appeal or waiver request?

A: The rescission does not impact the ability of participants to submit timely appeals or waivers pursuant to section 54.1718 of the program rules. However, the rescission means that the FCC cannot make new commitments in the course of administering the ECF program unless and until the full amount of the rescission is satisfied. If grant of an appeal and/or waiver request would require making a new obligation, the agency is prohibited by law from doing so unless the FCC has unobligated funds. The FCC will not have unobligated funds available for new ECF commitments unless and until it satisfies the full amount of the rescission. See FAQ 15.3. If you have ECF funding or commitments that you know you will not be using, you can voluntarily return those funds to the program. See FAQ 5.9.

15.8 Q: Do any of the deadlines associated with the sunset of the ECF program change?

A: No. The ECF program service delivery and invoice filing deadlines will not change. June 30, 2024 is the final service delivery date for most remaining ECF funding requests. August 29, 2024 was the invoice filing deadline for ECF funding requests with June 30, 2024 as the service delivery date. Un-invoiced ECF funds were de-obligated following the August 29, 2024 invoice filing deadline.

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15.9 Q: How do I reduce a funding commitment or return funding if I no longer need it?

A: To reduce the funding amount on a committed request or to cancel a funding commitment, applicants should file a Post-Commitment Request with USAC. Instructions on how to file a Post-Commitment Request may be found here: <https://www.emergencyconnectivityfund.org/ecf-post-commitment-request-form/>. To return excess disbursed ECF dollars, applicants should call the ECF Customer Support Center at (800) 234-9781.

***15.10 Q: What is the status of the rescission following the August 29, 2024 invoice filing deadline?** A: The FCC satisfied the rescission in mid-September by returning the full \$1.768 billion to the U.S. Treasury. The FCC and USAC were then able to proceed with resolving appeals, requests for waivers, and other post-commitment transactions. See FAQ 15.11.

***15.11 Q: What impact does the continuing resolution (CR) have on the ECF program?**

A: The continuing resolution (CR) that went into effect on October 1, 2024 means the FCC cannot make any new commitments from ECF funding until Congress adopts a government funding bill for fiscal year 2025. This again restricts the FCC's ability to make certain changes to existing funding commitments and in obligating any new funds, including to resolve an appeal, waiver request, or other post-commitment transaction. The CR has the effect of extending the fiscal year 2024 funding levels put in place by the government funding bill passed in March 2024, and also extends the rescission of the \$1.768 billion from the ECF program. Even though the FCC has returned the full rescinded amount, without a new funding bill for fiscal year 2025, the FCC remains constrained by the ECF rescission and is prohibited from making any new commitments from the ECF funding while the CR is in effect. See FAQ 15.3 for additional information on the impacts to the processing of requests.

***15.12 Q: When can ECF appeals and post-commitment requests be processed?**

The restrictions on making new commitments from ECF funding should be lifted if Congress passes a government funding bill for fiscal year 2025. It is expected that the FCC and USAC will be able to resume processing appeals, requests for waivers, and other post-commitment transactions for the ECF program at that time.

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