



CSM ECF WEBINAR - Q&A

June 3, 2021

1. Will you share a copy of the Power Point Presentation?

The PPT will be available on the ECF page at our website <http://csmcentral.com/ecf.html>

2. Please define the Homework Gap?

The Homework Gap is when a student leaves school and tries to learn from a remote location with insufficient resources to do so whether that is connectivity, device or, in some cases, both.

There is no formal definition of the homework gap (at present) from the FCC. However, we are interpreting this as a scenario where a student is unable to effectively participate in remote learning after school hours, for example, to be able to complete their homework assignments using online resources.

3. If access or connectivity was "Met" using CARES or ESSER funds previously, can ECF funding be used to pick up where those funds left off?

That's precisely what this program is to be used for – to address the homework gap—If you previously received partial funding through other sources, you can apply to ECF for the difference on future funding windows. HOWEVER, there is no double dipping. You cannot get reimbursed twice for the same invoice from different funding sources.

4. Does the ECF contain a limit for the monthly service fee for hotspots and other devices?

With unserved and underserved need, the FCC mentioned in the order there is some expectation that the monthly cost should be somewhere between \$10-\$25 per month.

5. If we purchase laptops with LTE, can we combine the \$400 with the \$250 for the total cost of the device?

The hotspot is a separate standalone device. An LTE-enabled Chromebook would be subject to the \$400 cap.

6. What is a 'commercially available' network? Can we get towers built in a community where only Satellite type broadband is the only broadband provider or the service is not reliable?

The FCC did not define what 'commercially available' means. We have questions out to the FCC for clarification. The order sets an extremely high bar to pass for fixed infrastructure projects. You must be able to substantiate (with documentation) that there are no commercially available providers able to provide service.



7. Are Library staff included in the eligibility like school staff?

The Order does not identify library staff as being eligible users like it does for school staff. We have questions out to the FCC for clarification.

8. How do we demonstrate the unmet or unserved need?

The best way to demonstrate unmet need is with a Needs Assessment Survey, or similar vehicle. Most districts performed one at the beginning of the Covid-19 pandemic determining who had access at home, the type of device at home, etc. That assessment should be sufficient documentation to get started. Districts will want to update their needs assessment to demonstrate future needs (for incoming classes, updated equipment requirements, etc.) before receiving reimbursement.

9. Would the "un-met need" have to be reported districtwide, or by individual school?

Unserved or underserved need is at the individual level. You cannot use measures like NSLP as a proxy for unmet need. The FCC has not defined how to demonstrate unserved or underserved need or how it needs to be reported. There is a presumption that the needs assessment was done at the school level during the Covid-19 pandemic and therefore the needs assessment would be tallied at the same individual school level, with a summary provided at the district level. We regard that as a best practice but there are other options to report unserved and underserved needs. Talk to your consultant about your specific situation.

10. Can we give families multiple Hotspots?

Hotspots are limited per eligible user not per household.

11. Are bundled warranties eligible?

The warranty must be bundled into the cost of the device with no separate charge.

12. Do these purchases under ECF need to go out to bid, or are we free to use a chosen vendor?

The FCC Order indicates "State and local procurement rules" (i.e., whatever your local procurement rules dictate.) If your rules tell you that your district must go out for bid, then that is what you will need to do, if you have not already. E-rate competitive bidding rules do not apply to this program.

13. If we were to publish and award an RFP for a Fiber to K12 households at a specified bitrate contingent on ECF funding, would the FCC cover the MRC for each household?

Yes, if the commercially-available fiber service is being delivered to a household with a demonstrated unmet need as a fixed wireline or wireless solution.



14. Will the ECF reimburse us for hotspots and monthly service already paid for the last year?

The FCC order anticipates future funding windows subject to available resources. It won't be eligible in the first window which is for equipment and services from July 1, 2021 to June 30, 2022 but may be in subsequent windows.

15. Do we need to wait for the window to open before purchasing equipment?

We think purchases RECEIVED after July 1, 2021 will be eligible for ECF.

16. Typically, we don't get everything delivered at one time. We get partial shipments. How does that work with ECF?

It will likely be based on the date of the invoice that should be coincident with delivery of the products

17. Will we need to certify a BEAR every month for hotspot services?

We are awaiting some clarification from the FCC on this question.

18. How long must the devices be used for the purpose intended? As an example, if we buy a device for a 6th grader (we are a K-6) can we repurpose the device for someone other than the unserved or underserved once the student leaves? This would also relate to students leaving our district.

It is presumed the device will be in use for a minimum of three years. We need to seek clarification from the FCC as to repurposing the equipment once the student leaves the district.

19. With high mobility in our district, what are the requirements surrounding lost/stolen devices? Are we required to report these devices?

Devices purchased with ECF funds must be tracked in some form of asset management system which includes check out and check in. In the event of an audit, you will likely be asked to produce the asset register.

20. Can I install outdoor Wi-Fi access points to buildings on our campuses for students to connect to?

The Wi-Fi access points pointed out to the neighborhood could only be purchased if no commercially available broadband services are available to the off-campus locations and remember, you cannot use Internet access funded by the traditional E-Rate program to provide off-campus support without an appropriate cost allocation.