

Emergency Connectivity Fund Webinar Questions and Answers

1. Are hotspots with prepaid service eligible?

Assuming your question relates to the initial prospective window, the devices are eligible for ECF support. You may receive funding support for the service as it is used and invoiced. You may submit invoices for reimbursement monthly, quarterly, bi-annually, or within 60 days of the end of the fiscal year (June 30, 2022). Stated differently, you may prepay for service on or after July 1, 2021 but you cannot receive reimbursement until after the service is used.

2. Is this only equipment? Software subscription?

It is not equipment only. Certain services are also eligible. However, the ECF eligibility list does not encompass software subscriptions.

3. Can the device cost more than \$400 and district pays overage?

Yes. The reimbursement cap of \$400 relates specifically to laptops, tablets, and other connected devices. If the devices cost more than \$400, then the District will have to pay the difference in cost.

4. Will there be a calculated predetermined ECF allotted amount per school district (similar to ESSER II and ARP) or is it just the 7.2 billion that everyone could equally access regardless of E-rate discount, student enrollment/demographics or other district factors?

No. There will be an initial window for prospective purchases of eligible goods/services. If funds remain, there will be a second window for retrospective procurements of eligible goods/services made between 3/1/20 and 6/30/21. If demand exceeds the available funding, then the Program will use Category One E-rate discount rates to determine priority, with preference given to rural applicants.

5. Are the Google device licenses eligible?

Under the rules as presently written, the device licenses are not eligible. There are ongoing advocacy efforts to the FCC to address this issue and to request that such licenses be deemed eligible.

6. Are white glove services eligible?

No.

7. Access restriction - for example, if you must log on to a chromebook and you disable the guest user option, would this be acceptable?

This would appear to be acceptable under the rules as written, provided the login is limited to the unique individual to which the device is assigned.

8. Would the service cost to provide remote CIPA compliance be eligible?

No. This service is not identified as eligible under Program rules.

9. Are monthly data plans for hotspots eligible or does that fall under user license?

Yes, monthly data plans are eligible as a service. There is a “reasonable cost” threshold which has yet to be determined, but most data plans in NJ should be at or under that threshold.

10. Would restricting chromebooks to only users with a district Google account qualify as restricting the device to those with appropriate credentials?

Probably not. Such an approach does not distinguish between who is at need and who is not if you allow anyone with a District google account to have access to every device. Focus on the requirement that each applicant conduct a needs assessment. That is the threshold step in the process. Without a needs assessment or similar process, you will not be able to demonstrate which students/staff did not have access to broadband connectivity or devices sufficient to promote distance learning.

11. If we apply for \$50,000, and they disagree, will they reduce the application or just turn it down?

Depending on the circumstances, USAC may reduce, deny, or work with the applicant to determine the appropriate amount on which to request reimbursement.

12. Can there be any "unmet needs" when it comes to staff?

Yes. Certain school staff may receive services and/or devices if they are determined to be "at need" and the District certifies as much. To illustrate, the staff member must not have a device or service that would allow him/her to participate in remote learning and that they cannot acquire that device or service without the District's support.

13. Mount Olive uses a service from Optimum lightpath called Student Wi-Fi. It is based off of MAC hardware list of district chromebooks. The service is intended to provide households with Internet access. Is this service eligible?

Yes, it is eligible for students and staff determined to be "at need."

14. Will smartboards used to teach virtually be considered allowable equipment?

No.

15. What certification is required? Equipment restrictions, CIPA, etc.? Anything else?

There are several certifications specific to the ECF. A synopsis and the initial draft of these certifications can be found in slides 17-19 and starting at #94 of the following link:

<https://omb.report/icr/202105-3060-007/doc/111623500>

16. Does a NJ State Contract count since there's no competitive bidding requirement?

Yes, any NJ State contract or cooperative purchasing arrangement that has been bid in compliance with State law and/or BOE regulations is a valid procurement tool.

17. If the schools wind up opening 100% by September, and the students all return, would this negate the "unmet need"?

No. This Program is intended to enable distance learning. There will still be students who cannot afford devices or services if left to do so on their own.

18. So if an 80% or higher discount-level school already has a take home 1:1 program, would there technically be an unmet need here?

It seems more than likely for a number of students. Note first that your E-rate discount has no bearing on eligibility for ECF reimbursements. The threshold step is to conduct a needs assessment if you have not already done so (i.e., who lacks a device and/or broadband service sufficient to facilitate distance learning). To fulfill the "unmet need" requirement, the student or staff member does not have his/her own device and cannot purchase one without the District's financial support.

19. Would the monthly service cost of providing "at need" students a Verizon Jetpack MiFi's?

The cost of the Jetpack device and the related broadband service are eligible for ECF support.

20. If we are already 1-to-1, can we say that students who have devices that are beyond useful life have an unmet need? In other words, can we replace old devices using these funds?

Yes, for those whose household cannot afford a device to afford them off-campus connectivity. You cannot simply replace every EOL device and claim there is an unmet need. Funding support is restricted to only those devices/services that are given to students who would otherwise be without the foundational tools necessary to complete their homework off-campus.

21. If a district is not 1-1 and cannot currently guarantee a device to most of their students to bring. That doesn't necessarily count as the needs not being met to their students?

This is a more nuanced question. The bottom line is that the student or staff member must lack the ability to purchase the service or device necessary to participate in distance learning.

22. So if the district expanded educational services such as YMCA, Girls and Boys club, they can get Internet access through the district?

Yes. The ECF is intended to provide funding support for goods/services used for off-campus learning. It is not restricted to funding services for the home.

23. What if you lease laptops over multiple years? Are only the current year's payments eligible?

Laptop and tablet leases are not currently eligible for ECF support. Only modem and hotspot leases are eligible under the rules as presently written.

24. An unmet need would include a student who doesn't have access to their own device at home?

Yes, there is a unmet need in that the student does not have access to a device but that does not necessarily mean that the household is unable to purchase the necessary service/device.

25. So just to be clear I heard this right, I can use these funds to replace devices that are reaching end of life? Chromebooks in particular that are nearing end of support life. We have a number of those devices in the hands of students currently.

You may be eligible for ECF support on replacements for only those EOL devices that will be used by “at need” pupils and instructional staff. You are not eligible to receive support for all new devices unless all of your pupils have been determined to be “at need” and will use the devices primarily for distance learning purposes.

26. We have many chromebooks that are expiring (end of life) in September, will new orders be covered under this.

New orders for the 2021-22 fiscal year will be covered under the initial window of the ECF Program for “at need” pupils. If you must purchase new devices to replace

EOL devices in September, ECF support may be available for those new devices that will be given to “at need” pupils primarily for distance learning purposes.

27. Can we utilize surveys we performed in Aug/September of 2020?

Yes.

28. Essentially my district may have only a handful of students that appear to be eligible by your descriptions. Does it make sense to even apply?

That depends. The ECF is offering 100% funding support towards the purchase of eligible goods/services. If the return outweighs the cost to apply, then it may be worthwhile. Another consideration is your Category One discount rate. If you do not apply for prospective support and instead wait to apply during the (possible) second window, then you risk receiving nothing if demand exceeds available funding and your C1 discount rate is 60% or less.

29. Can we purchase devices for teachers?

If they are determined to be “at need” and may be required to provide remote pupil instruction.

30. Can the survey question be as simple as "Do you have a device at home for every child in your family and if not can you afford to provide one?"

Maybe. This survey question looks acceptable and should satisfy Program rules. We are awaiting guidance from the FCC as to what constitutes “reasonable measures” to assess need. The most important question is whether the individual has access to a device sufficient to engage in distance learning.

31. If we survey households and they are not free and reduced status and they are asking for a device for the sake of requesting one do they qualify?

F/R status does not factor into ECF eligibility. The FCC specifically declined to define a specific financial threshold as a basis for qualification.

32. Would Educational Assistants potentially qualify?

Maybe. It depends on whether s/he is “at need” and whether s/he may be required to provide remote pupil instruction.

33. Is unmet need based on what the district can afford to provide or based on if the parents can afford to buy?

It is based on whether the household or the staff member can afford to purchase a device sufficient to engage in distance learning.

34. What if the family is capable of affording but parent refuses to provide the device or services. Does that apply?

If the household responds to your survey that it can afford to purchase a device, irrespective of whether or not they refuse to do so, they should be deemed as NOT having an “unmet need” within the meaning of Program rules.

35. Did I see unmet needs for staff in the presentation? Would an upgraded device that enables zoom communication for the staff qualify?

Possibly, if it’s a “connected device” of the type defined as eligible under Program rules and the staff member has an unmet need. If the staff member owns a device that cannot be used for distance learning purposes, you must determine whether s/he can afford a device that can be used for that purpose. If not, then you may procure a device for that individual. With that said, the cap of \$400 still applies. You may be able to request a waiver of the cap if the device is specific to a type of special education or related service and, without the device, the pupil would not be able to learn off-campus.

36. Can we extrapolate survey data? If 20% of responders state that they do not have a device at home, can we purchase devices for 20% of the entire population or just the students who responded?

No. The needs assessment must be tethered to individual pupils/staff, which means that data extrapolation is not permitted.

37. What if parents reported they have Internet but the students have been using cell phones. This service and or device has been insufficient. We need them to have actual devices. How does that play out?

If an individual's service/device is not sufficient to enable distance learning, then that individual has an "unmet need." Smart phones are not eligible for ECF support and are not recognized as equivalent to laptops/tablets. If pupils/staff require devices and are determined to be "at need," then those devices may be eligible for ECF support.

38. If you buy a device that is \$800 can \$400 come from this funding and the other \$400 come from ESSER/CARES/Title I?

The rules do not prohibit this type of procurement provided you have sufficient documentation to substantiate that you conducted a needs assessment and the device is for an "at need" pupil or staff member.