

## How do I prepare for a PIA Review?

### What is PIA?

Program Integrity Assurance (PIA) is the process used by USAC to review applications for compliance with program rules and policies. During this process, USAC reviews the information on your Form 471 and may contact you with additional questions on specific items.

The PIA review process has two components:

- Initial Review
- Final Review, a quality assurance review process on the work done during Initial Review

Almost everyone receives a PIA review. In some cases, the information on the Form 471 is sufficient to complete the review without applicant contact. However, in most cases, USAC must request more information. The initial reviewer will contact you using your preferred mode of contact as listed on the Form 471.

### What is the reviewer is likely to ask?

The PIA reviewer assigned to your application is likely to ask questions that make sure you comply with E-Rate rules such as the following:

- Eligibility of the schools and libraries listed on your application
  - Be ready to provide proof that all entities listed on the form are E-Rate eligible.
  - If there was public discussion of closing, but a school was not closed, be prepared to explain to PIA.
  - If school has closed, be prepared to work with PIA to adjust your discount rates and funding requests.
- Eligibility of the products and services listed on your Item 21 attachment
  - Carefully read the Eligible Services List to make sure you understand and can explain what you are requesting when PIA contacts you.
  - Be ready to present your case that the items requested are eligible.
- Proper discount calculations and the discount rate on your Block 4 worksheet(s)
  - Be ready to produce the report of NSLP numbers used to complete Block 4 of the Form 471.
  - If a survey or other alternative discount mechanism was used to determine eligibility, prepare a sample blank survey and gather together all of the returned surveys.
- Competitive bidding process and contracts
  - Be ready to produce documents that clearly indicate how you selected a bidder and the bid evaluation document used.
  - Be able to show that the bid you accepted is cost effective.
  - If more than one person evaluated bids, be ready to produce all signed and dated copies of evaluation forms.

- Be prepared to provide proof of your adherence to the 28-day posting requirement.
- Be ready to produce signed and dated contracts (as well as contract amendments, addendums, extensions) and service agreements.
- Ability of applicants to pay their share
  - All items being purchased and supported by E-Rate have to be clearly listed within your budget for the funding year for which they are requested, including the funding source.
  - The budget must provide sufficient resources to acquire and support the non-discounted elements of the plan: the hardware, software, professional development and other services that will be needed to implement the strategy.
- Proper posting of forms
  - Forms must be posted on or before the deadline date.

## How do I respond?

- Provide documentation in a timely manner.
  - Typically a 15-day response deadline is given.
  - If USAC has not received a response – or receives only a partial response – after seven days, USAC sends you a reminder and forwards a copy of the reminder to your state E-Rate coordinator.
  - If USAC does not receive a response after 15 days, USAC will continue to process your application with the information on hand, which may lead to a modification or denial of funding.
- During all review processes, you have the following options:
  - You can ask for clarification.
    - If you do not understand a question, ask the reviewer what the question means or what information USAC expects in your response.
    - Feel free to ask questions to ensure you are providing adequate documentation, but answer only the specific question(s) and do not provide "extra" information.
  - You can ask for more time to respond.
    - USAC can grant a limited extension of time to respond to questions.
    - Make your extension request in writing.
    - Be aware that if you ask for more time, your initial reviewer may set aside your application and start other reviews while you work on your response, so he or she may not be able to return to your application quickly once you provide the information.
  - You can ask to speak with a manager.
    - If you feel that you are not communicating successfully with your initial reviewer, you may ask to speak to a manager.
    - You will not be penalized if you make this request, and the manager can help you understand the questions USAC is asking and the responses USAC expects to receive.
- Keep accurate and organized records.
  - Document everything.
  - When responding to review questions, a best practice is to copy the question and then add the answer.