

## Document Retention Requirements

The FCC's E-Rate Modernization Order expanded the E-Rate documentation requirement from five years to ten years from the last date to receive service or equipment delivery date, whichever is later. This requirement relates to all documentation related to pre-commitment, contracting, post-commitment, invoicing and all backup data that supports the certifications made on any E-Rate application.

Generally, the last date to receive service is the final day of the funding year. For example: For FY2015, the last date to receive recurring service is June 30, 2016. All documents related to FY2015 must be kept through June 30, 2026.

For multi-year contracts, contract documentation and bids must be kept ten years from the last date of service under the contract, even if the contract was competitively bid more than ten years ago. For example: A five year contract starts July 1, 2015 and expires June 30, 2020. All documents related to this contract, including original competitive bidding documents, must be kept through June 30, 2030.

Violations can subject an applicant to a commitment adjustment ("COMAD"). If during an audit, an applicant cannot properly document any required aspect of a funded service, USAC may demand the repayment of all associated funds.

The following is an unofficial, suggested list of documents to be retained:

- **Pre-bidding Process.** Applicants must retain the technology plan and technology plan approval letter for funding years prior to Funding Year 2015 (technology plans are no longer required beginning in FY2015). If consultants are involved, applicants must retain signed copies of all written agreements with E-Rate consultants.
- **Bidding Process.** All documents used during the competitive bidding process must be retained, such as: RFPs, including evidence of the publication date; documents describing the bid evaluation criteria and weighting, as well as the bid evaluation worksheets; all written correspondence between the applicant and prospective bidders regarding the products and service sought; all winning and losing bids submitted; and documents related to the selection of service provider(s).
- **Contracts.** Applicants must retain executed contracts, including all amendments and addendums. Applicants must retain all agreements relating to E-Rate between the applicant and service provider, such as up-front payment arrangements and all change orders or documentation for verbal change orders.
- **Application Process.** Applicants must retain all documents relied upon to submit the Form 471, including NSLP eligibility documentation supporting the discount percentage sought; documents to support the necessary resources certification, including budgets; and documents used to prepare the Item 21 description of services.
- **Purchase and Delivery of Services.** Applicants should retain all documents related to the purchase and delivery of E-Rate eligible services and equipment. Applicants must retain purchase requisitions, purchase orders, packing slips, delivery and installation records showing where equipment was delivered and installed or where services were provided.
- **Invoicing.** Applicants must retain all invoices and records proving payment of the invoice, such as accounts payable records, service provider statement, beneficiary check, bank statement or ACH transaction record. Applicants must also be able to show proof of service provider payment to the beneficiary of the BEAR, if applicable.
- **Inventory.** Applicants must retain asset and inventory records of equipment purchased and components of supported internal connections services sufficient to verify the location of such equipment. Applicants must also retain detailed records documenting any transfer of equipment within three years after purchase and the reasons for such a transfer.



- **Forms and Rule Compliance.** All program forms, attachments and documents submitted to USAC must be retained. Applicants must retain all official notification letters from USAC. Applicants must retain Form 470 and Form 471 and certification pages (if not certified electronically), Form 471 Item 21 spreadsheets, Form 479 (if applicable), Form 486, Form 500, Form 472. Applicants must also retain any documents submitted to USAC during program integrity assurance (PIA) review, Selective Review and Invoicing Review, or for SPIN change or other requests. In addition, applicants must retain documents to provide compliance with other program rules, such as records relevant to show compliance with CIPA.