FREE CHECKLIST · SCHOOLS AND LIBRARIES IN THE E-RATE PROGRAM

CIPA audit evidence checklist

What to keep on file for each funding year, so you can show CIPA compliance if USAC reviews or audits you. Tick a box when the copy is in the folder.

SCHOOL OR LIBRARY	FUNDING YEAR	FOLDER OWNER	LAST CHECKED

How to use it

- Make one folder for each funding year.
- Save copies, not links. Old web pages disappear.
- Write your own office or file path on the dotted lines.
- Check the folder before you certify each year, and when staff change.

What the tags mean

USAC list USAC names it as a CIPA audit or retention document.

FCC rule An FCC rule requires it.

Good practice Not required by name. It helps you prove the rest.

1 Internet safety policy and its adoption

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **The internet safety policy in force that year** A dated copy of the version used for that funding year, not only today's. Check it covers the five required topics: minors' access to inappropriate matter online; minors' safety in email, chat rooms and other direct electronic communications; unauthorized access, including hacking, and other unlawful activity by minors; unauthorized disclosure, use and dissemination of minors' personal information; and measures that restrict minors' access to material harmful to minors.	Board policy manual, policy page on your website, board clerk	USAC list
☐ **Proof the policy was adopted** Board minutes or a resolution approving the policy, with the date. Add the dates of later amendments.	Board clerk or secretary, minutes archive	USAC list
☐ **Your local decision on what is inappropriate for minors** The FCC rule leaves this decision to the school board, library board or other local authority. Write it into the policy so a reviewer can find it.	Policy text, board minutes	Good practice

2 Public notice and the hearing or meeting

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **Proof of reasonable public notice** For example, a website announcement of an open board meeting where the policy was discussed, or a newspaper notice of a meeting with the policy on the agenda. Private schools give notice to their own constituent group.	Board clerk, website or newsletter archive, local newspaper	USAC list
☐ **Proof the hearing or meeting took place** Minutes of the hearing or meeting, with its date. At a minimum, keep some record of when notice was given and when the meeting took place, such as the agenda.	Board clerk, minutes archive	USAC list

One meeting is enough. USAC says more meetings are not needed when you amend the policy, unless state or local rules or your own policy require them.

3 The technology protection measure (your filter)

CIPA requires a filter that blocks visual depictions that are obscene or child pornography for all users, and those harmful to minors when minors use the computers. A minor is anyone under 17.

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **A description of the filter** What it is, where it runs, and which networks, buildings and devices it covers. Update it when anything changes.	IT department, filter contract or documentation	USAC list
☐ **The filter settings, with the categories blocked** An export or dated screenshot of the categories blocked for each group, such as students, staff and patrons. Save a new copy when settings change.	Filter admin console	Good practice
☐ **Proof the filter was installed and working during the year** For example, reports of sites blocked, bills from the provider showing the filter was working, or logs showing the hours the filter was on. Spread them across the year, such as one report a month.	Filter reports, provider invoices, business office	USAC list
☐ **Filter purchase and installation records** The contract or order, invoices and any installation records.	Business office, IT department	USAC list

4 Adult unblocking, if you use it

CIPA allows an administrator, supervisor or other authorized person to disable the filter during use by an adult, for bona fide research or other lawful purpose. It is optional.

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **The written unblocking procedure** Who may disable the filter, how an adult asks, and how long it stays off. USAC gives the example of a sign-in page where an adult affirms the purpose.	Policy section or appendix, staff handbook, desk manual	Good practice
☐ **The unblocking log** Date, time, staff member and length of each session. Record only what your policy needs.	Filter console log, desk log	Good practice

5 Certification forms

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **FCC Form 486 for each funding year** The certified form with its CIPA certification, and the Form 486 Notification Letter from USAC.	E-Rate Productivity Center (EPC): save a PDF of the form and letter	USAC list
☐ **FCC Form 479, for consortium members** Members keep the copy they gave the consortium leader. Leaders keep every member's Form 479. This form goes to the leader, not to USAC.	E-Rate coordinator, consortium leader	USAC list
☐ **First CIPA funding year only: proof of "undertaking actions"** If you certified that you were undertaking actions to comply, keep proof dated before services started. Examples: a board agenda listing CIPA as a topic, or a draft request for proposals for a filter.	Board clerk, IT department	USAC list

Change from funding year 2028. The FCC is moving the CIPA certification from Form 486 to the FCC Form 471 (order FCC 26-30, May 2026). Consortium leaders will collect Forms 479 before they certify the Form 471. For those years, keep the Form 471 with its CIPA certification. Until then, Form 486 is still used.

6 Schools only: monitoring and online safety education

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **Policy language on monitoring** A school's policy must include monitoring the online activities of minors.	Policy text	FCC rule
☐ **Policy language on online safety education** Since July 1, 2012, a school's policy must provide for educating minors about appropriate online behavior. This includes interacting with others on social networking websites and in chat rooms, and cyberbullying awareness and response.	Policy text	FCC rule
☐ **Proof the lessons happen** A curriculum outline, lesson plans, or a schedule with delivery dates by grade or building.	Curriculum office, principals	Good practice

7 How long to keep it

KEEP ON FILE	WHERE TO FIND IT	BASIS
☐ **A written retention rule: at least 10 years** Keep every item above for at least 10 years after the later of the last day of the funding year or the service delivery deadline for the funding request. **Example:** funding year 2025 runs from July 1, 2025 to June 30, 2026. If its service delivery deadline is also June 30, 2026, keep its records until at least June 30, 2036.	Records retention schedule, E-Rate coordinator	FCC rule
☐ **Each policy version, for every year that relied on it** The FCC ties policy records to each funding year that relied on the policy (FCC 11-125). So a policy you use for many years is kept until 10 years after the last of those years.	Policy folder, board clerk	FCC rule

If something is missing

USAC lets applicants correct some minor errors that do not affect CIPA compliance itself, before it recovers funds. Its two examples: a school that complied in practice but left a required topic out of its written policy can correct the policy. A school or library that cannot find the record of a notice and hearing or meeting held after August 2004 can give new notice and hold a new hearing or meeting. Talk to your E-Rate adviser before you reply to a review.

Rules can change

In June 2026 the FCC asked for comments on possible changes to its CIPA rules (FCC 26-41). These are proposals, not rules. Check usac.org before each certification.

Sources (checked November 2, 2026)

1. USAC, "CIPA": usac.org/e-rate/applicant-process/starting-services/cipa/ (requirements, audit documents, retention, corrections)
2. USAC, "Document Retention": usac.org/e-rate/resources/document-retention/
3. USAC, "E-Rate Program List of Documents to Retain for Audits and to Show Compliance with Program Rules" (updated December 2025)
4. USAC, "FCC Form 479 Filing" and "FCC Form 486 Filing" pages on usac.org
5. 47 C.F.R. § 54.520 (CIPA certifications) and § 54.516 (record keeping), eCFR
6. FCC 11-125, Report and Order, August 2011; FCC 26-30, Report and Order, May 2026; FCC 26-41, Notice of Proposed Rulemaking, June 2026. All on docs.fcc.gov

General information for school and library staff. It is not legal advice. Confirm details with current USAC guidance and your E-Rate adviser. Related guide: cipawebfiltering.com/guides/cipa-audit-what-usac-asks-for.php