



Jessica Rosenworcel  
Chairwoman, Federal Communications Commission  
45 L Street NE  
Washington, DC 20554  
Filed electronically via <https://www.fcc.gov/ecfs/filings>

Re: Affordable Connectivity Program (Docket No. 21–450)

Dear Chairwoman Rosenworcel,

On behalf of the National Urban League, an organization with a 111-year history of advocating for policies that promote economic empowerment for African Americans and other historically underserved communities, I write to share with the Federal Communications Commission (FCC) our recommendations on how to structure and implement an outreach grant to maximize enrollment in the FCC’s Affordable Connectivity Program, as required under the Infrastructure Investment and Jobs Act (IIJA).

Throughout our organization’s existence, Urban League affiliates have worked tirelessly as community navigators and advocates, acting as trusted messengers within their communities, helping them get connected to jobs, healthcare, small business support, housing, and education. We currently serve over 300 communities in 36 states and the District of Columbia, providing direct service to 2 million people annually.

The National Urban League has long recognized that the digital divide denies the people we serve equal access to healthcare, education, employment, and civic and political engagement. Since at least 2010, we have advocated for affordable high-speed broadband and technology so that African Americans and communities of color can successfully take advantage of these digital services and opportunities. Last month, we released a digital equity White Paper<sup>1</sup> that offers a practical roadmap for governmental entities awarding new broadband funding made available through the Infrastructure Investment and Jobs Act. This roadmap builds on the National Urban League’s *Lewis Latimer Plan for Digital Equity and Inclusion*<sup>2</sup> – a comprehensive analysis for addressing broadband availability, adoption, and access for lesser served communities.

In our increasingly connected society, upwards of 79 million Americans remain at risk of being left out or forgotten simply because they cannot afford to get online.<sup>3</sup> If the pandemic has taught us anything, it is that our communities are remarkably resilient. But the prospect of a full recovery remains unevenly distributed across the country. Those who are afforded the chance to

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<sup>1</sup> “From Page to Progress: Bringing the Latimer Plan to Life through Infrastructure Investment and Jobs Act Funding” <https://nul.org/news/national-urban-league-releases-white-paper-on-digital-equity>

<sup>2</sup> “The Lewis Latimer Plan for Digital Equity and Inclusion.” *National Urban League*. [https://nul.org/sites/default/files/2021-04/NUL%20LL%20DEIA%20041421%20Latimer%20Plan\\_vFINAL\\_1136AM.pdf](https://nul.org/sites/default/files/2021-04/NUL%20LL%20DEIA%20041421%20Latimer%20Plan_vFINAL_1136AM.pdf)

<sup>3</sup> “The Lewis Latimer Plan for Digital Equity and Inclusion”

be more mobile and more digital have the upper hand. Everyone else faces a steep uphill battle. Fortunately, through the Affordable Connectivity Program (ACP), we have the power and the necessary funding to shift the fortunes of millions of Americans by giving them access to the tools and skills they need to succeed in the 21<sup>st</sup> Century. I am pleased to offer the following recommendations to help the FCC structure and implement an ACP outreach program to ensure as many eligible households are educated about this new federal resource and successfully sign up to receive this benefit.

### **Models for Federal Outreach Programs the FCC Should Consider**

It is the National Urban League's belief and experience that the most critical component of outreach is sending trusted people into the community. As such, it is important that funds be made available for anchor institutions offering education and outreach activities, as well as those with community navigator programs. There are two existing federal outreach grant programs that the FCC should consider as models, including the "Partnering for Vaccine Equity" program<sup>4</sup> at the Centers for Disease Control and Prevention (CDC) and the "Community-Based Workforce for COVID-19 Vaccine Outreach" program<sup>5</sup> at the U.S. Health Resources and Services Administration (HRSA).

*Education and Outreach Campaigns* – The CDC Partnering for Vaccine Equity grant program is aimed at increasing knowledge and trust in vaccines through education and outreach campaigns. Specifically, the grant's objective is to support organizations considered trusted voices in their communities so that they can encourage people to get vaccinated. As a CDC grantee, the National Urban League, in conjunction with 35 Urban League affiliates, trained 76,526 trusted messengers, established 412 partnerships, opened 272 nontraditional vaccination sites, sponsored 1,118 events, and disseminated 3,294 social media posts as part of our education and outreach campaigns from April 1-December 31, 2021. Our combined campaigns reached a total of 32,700,670 people through radio and tv broadcasts, social media, outdoor advertising, and public events. While the program's goals were focused on vaccination education and outreach, our Urban League affiliates went above and beyond those goals by assisting 75,144 in receiving the COVID 19 vaccine at a temporary or mobile site.

*Community Navigator Programs* – The Health Resources and Services Administration (HRSA) and the Centers for Disease Control and Prevention (CDC) launched the Community-Based Workforce for COVID-19 Vaccine Outreach program to accelerate the delivery of vaccines to medically underserved communities and disproportionately affected populations through HRSA-supported health centers. As a grantee of HRSA's program, the National Urban League has been able to provide subgrants to 6 Urban League affiliate sites to hire and train 20 full-time community navigator staff and compensate them at a \$17/hourly wage to serve as trusted messengers to increase the number of vaccinations secured.

We encourage the FCC to structure its Affordable Connectivity Outreach Grant (ACP) Program using both programs as examples. For instance, the FCC can offer grants to trusted anchor

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<sup>4</sup> "Partnering for Vaccine Equity | CDC." 2022. <https://www.cdc.gov/vaccines/health-equity/index.html>

<sup>5</sup> "Community-Based Workforce for COVID-19 Vaccine Outreach Awards." 2021. *Official web site of the U.S. Health Resources & Services Administration*. <https://www.hrsa.gov/coronavirus/community-based-workforce>

organizations to promote education and awareness about the ACP benefit to covered populations. The FCC can also fund community navigator programs that help individuals navigate the ACP benefit enrollment process and sign up for internet access using the ACP subsidy. To ensure the outreach program is brought to scale efficiently, the FCC should ensure national nonprofit intermediaries with a community-based network in multiple states are eligible to compete.

### **Duration and Budget for an Outreach Program**

In the National Urban League's experience as a federal grant recipient and direct services provider, multi-year grants are more efficient and effective. Multi-year grants give organizations the ability to see the trajectory of federal projects and sufficient data to effectively measure results. Multi-year grants also build in the necessary time needed to onboard employees and to implement lessons learned from the on-ramp year. This is especially true with direct service grants that enable the hiring and training of full-time staff.

The CDC Partnering for Vaccine Equity grant is structured as a cooperative grant agreement that funds organizations for one year while allowing for renewals based on funding availability. In practice, this grant model works as a one-year "pilot" while building multi-year funding, and has been an effective approach, in the National Urban League's experience.

### **Activities for Outreach Grant Funds**

Based on our experience implementing federally funded outreach campaigns, the National Urban League recommends the following activities as allowable uses of funds: community events, mailers, radio and television broadcasts, paid advertisements, ethnic media, newsletters, social media, and other outreach targeted to the populations covered in the IJJA. We also recommend the funding of consortiums and partnerships at the local level as appropriate, including with other community-based organizations, local government, public libraries, faith-based organizations, and schools.

To execute effective outreach efforts at scale, we recommend funding national nonprofit intermediaries at a level of at least \$5 million to cover education and awareness campaigns and more funding for campaigns that include community navigator programs. For an education and outreach grant, it will take less time and fewer resources to target outreach if the organization already has access to clients (like the National Urban League does). With our CDC grant, 35 affiliates received approximately \$35,000 each to complete education and outreach activities and were very successful in their efforts to inform their communities on vaccine facts. If an organization is not already front-facing to clients, it will take them more time to establish themselves as trusted community messengers and they will likely need more funding to procure lists of people to target.

If the grant program uses a community navigator model, higher levels of funding are required in order to hire and train full time staff, and then actually connect individuals with vaccines, or, in the case of the Affordable Connectivity Program, the \$30 benefit. Our \$11 million HRSA grant allowed us to sub grant over \$1.3 million to 6 sites to execute outreach activities using community navigators.

Another option to consider is a tiered model. The National Urban League received a \$5 million grant from the Small Business Administration for our small business navigation work. The first tier of funding allowed us to provide \$340,000 subgrants over two years to seven Urban League affiliates to do individual small business coaching and assist with myriad other services based on entrepreneur need. The second tier of funding allowed us to subgrant \$50,000 over two years to 18 Urban League affiliates to identify and address a specific barrier for small and disadvantaged businesses in a particular community such as access to capital, contracts, or marketing tools.

### **Technical Support for Grantees**

We encourage the FCC to provide technical assistance to make the ACP outreach program as “turnkey” as possible for grantees. In our experience, helpful materials and actions include best practices webinars for grantees; data management for grantees; targeted information, for example, showing where lack of broadband access is actually happening; creation of a learning collaborative among grantees to diffuse information on what’s working and not; outreach toolkits with graphics, sample social media, PowerPoints, one pagers, flyers, sample talking points, etc.; and the creation of a feedback loop with community-based organization to test any materials created.

Additionally, we recommend having user-friendly platforms for the collection and reporting of finances and performance data, as well as any other information necessary for monitoring and evaluation. Additional technical assistance on how to use reporting platforms and what kind of data to collect up front would be beneficial, so that policies and procedures remain consistent throughout the program.

Rural LISC launched a new tool<sup>6</sup> in collaboration with Heartland Forward designed to aid digital navigators and other partner organizations in identifying the communities that can benefit most from outreach and awareness efforts on broadband access. The tool maps 2021 enrollment in the FCC’s Emergency Broadband Benefit (EBB) Program, presenting a nationwide view of household EBB enrollment based on eligibility by ZIP Code. On average across the country, an estimated 17 percent of households that were eligible for the benefit enrolled. Disseminating information like this to grantees would be extremely beneficial to aid accuracy and efficiency in targeting geographic areas most in need.

### **Eligible Entities**

Eligibility should be limited to non-profit organizations with tax exempt status under 26 U.S.C. 501(c)(3), with a strong preference for equity-based organizations and those with a demonstrated track record of success doing outreach to low-income and communities of color. National and regional nonprofit intermediaries with a history of serving these targeted populations should also be prioritized. The National Urban League, for example, has a 111- year history providing outreach, education, and direct services. Our hub and spoke model has proven effective in reaching underserved communities, and we have experience managing Federal grants.

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<sup>6</sup> “Emergency Broadband Benefit Snapshot | LISC Rural LISC.” *Local Initiatives Support Corporation*. <https://www.lisc.org/rural/our-work/broadband-infrastructure/emergency-broadband-benefit-snapshot/> (March 2, 2022).

We would also note that a two-tiered model could be potentially useful. For example, organizations with experience receive a higher grant amount (and are expected to sub grant to more affiliates or do more outreach, depending on the type of organization), and smaller organizations or organizations new to this work receive a smaller grant. This is a way to support smaller community-based organizations doing great work (the National Institutes of Health does this when they make new investigator grants), while still ensuring Federal dollars are being spent effectively.

Most importantly, grants should be limited to nonprofit organizations that serve the target populations. These organizations tend to already have trust within communities and are anchor institutions that provide resources and direct services, education, and outreach to community members. In particular, organizations that are already working with underserved communities and the covered populations for this program would be the most effective grant recipients.

### **Subgrantees**

As previously mentioned, the FCC's ACP outreach grant program should be designed to allow subgranting by national nonprofit intermediary organizations. Intermediary organizations help implement Federal programs at scale with efficiency and efficacy. With a hub and spoke approach, the "hub" (national intermediary) is there to disseminate information and provide technical assistance and support to the "spokes" (our network of community-based organizations) across the country. This allows Federal dollars to go further, as each individual subgrantee is not on their own to implement the grant. The National Urban League, in particular, has experience implementing Federal programs on an emergency basis and would be able to get resources to our subgrantees quickly. Our grants from the CDC, HRSA, and SBA mentioned above allow us to deliver these services at scale and provide technical assistance to ensure program success. National intermediaries have increased breadth and depth of expertise and experience, leading to better targeted outreach and overall outcomes.

### **Goals and Metrics to Measure Performance**

Appropriate metrics to track performance for the Affordable Connectivity Program can include number of navigators hired (if this is a community navigator grant); the number of and attendance at events; number and views of social media posts; numbers of phone banks, text banks; clicks on a webpage; media attention; and number of people signed up for the benefit.

To aggregate and report the performance data received from the grantees, we recommend creating a platform and/or data collection tool for grantees to input data as they go and report back monthly. HRSA uses a Survey Monkey data collection tool – every time someone gets vaccinated, the grantee fills out a survey with the necessary information. The Small Business Administration uses Salesforce to collect metrics on loans and grants applied for and received and an Excel spreadsheet to track outreach and training numbers. The CDC created a tool called Redcap for grantees to input data. We recommend a tool to track financial reporting as well – this helps grantees understand where they are in terms of spending down grants and would allow them to account for invoices, payroll, and all other expenses in one place.

Regarding appropriate periods of time for reporting and invoicing, we recommend collecting metrics monthly. For assessing performance, we recommend yearly with a semi-annual check-in opportunity.

Thank you for the opportunity to provide our recommendations on how to structure this outreach program. Should you have any questions, please contact Joi Chaney ([jchaney@nul.org](mailto:jchaney@nul.org)), Executive Director of the Washington Bureau and Senior Vice President, Policy and Advocacy. We look forward to working with you to ensure this important broadband benefit reaches all communities who are eligible to receive it.

Sincerely,



Marc H. Morial  
President and CEO  
National Urban League