Hello, and thank you for joining us today. We will begin the webinar shortly. Due to the format of our webinar, we regret that dial-in audio is not available for this webinar. If you would like to listen to this webinar on your mobile device, you must download the GoToWebinar app for Android or Apple devices.

If you are not able to download the app, rest assured, this webinar will also be available for on-demand viewing at [https://broadbandusa.ntia.doc.gov/events/past-events](https://broadbandusa.ntia.doc.gov/events/past-events) no later than September 29th. Thank you so much.

Hello, everyone, and welcome to the Connecting Minority Communities (CMC) Pilot Program webinar. My name is Cameron Lewis, and I'm a Broadband Program Specialist with NTIA, and I will be serving as your moderator for today.

Now, before we kick off, I would like to cover a few housekeeping notes. First and foremost, there will be some good information presented today. So, if you have any questions, please feel free to enter them into the chat box, and we will address them during the Q&A portion of the webinar.

I would also like to announce that the presentation slides and a transcript will be available on the BroadbandUSA website after the completion of our September webinar series.

Now, at this time, I have absolute pleasure of introducing our speakers for today's presentation. First up, we have Scott Woods, our senior broadband program specialist.

Michell Morton, Janice Wilkins, and Kevin Hughes, who are all our broadband program specialists. Dr. Francine Alkisswani, our telecommunications policy analyst. We have Pandora Beasley-Timpson, our management and program analyst. And last, but definitely not least, we have Yongming (Ming) Qiu, our grants officer from NIST.

I will briefly give you an overview of today's webinar and then we can get started. First, we will have CMC program updates from Scott Woods, followed by Michell Morton, Janice Wilkins, and Kevin Hughes with our CMC top five issues and questions.
We will then hear from Ming Qiu regarding the CMC application submission process, then from Dr. Francine Alkisswani for our CMC evaluation and data collection updates.

We will then move along to Pandora Beasley-Timpson for updates regarding our merit reviewers. And then I will see you again soon after for our Q&A portion of the presentation. And now, without further ado, let's get to it.

At this time, I would like to invite Scott Woods to the main screen to bring you our CMC program updates. Scott?

Thank you Cameron, and good afternoon everyone. My name is Scott Woods. I'm a senior broadband program specialist here with NTIA, and I have the pleasure of serving as the team lead or the Connecting Minority Communities Pilot Program. In this particular section of today's presentation, I'm going to walk you through, as well as team members, some programmatic updates that we have to the CMC Anchor Community pilot program.

So first we're going to start off by talking about the dashboard. As you all are aware, recently, the Department of Education has updated its 2021 eligibility matrix for MSI-designated institutions. We validated that data and now the CMC Anchor Community Eligibility Dashboard, or CMC Dashboard, has been updated to reflect the following:

Number one, we've removed 72 schools, and those schools are no longer eligible for the CMC Pilot Program. Number two, we've added 90 new schools. Number three, for those 90 new schools, the Anchor Community Radius Boundary and the poverty analysis visualizations have been added to the dashboard.

Do you have any questions about any of this information? You can refer to the Department of Education's 2021 eligibility matrix. There's a link here: https://www2.ed.gov/about/offices/list/ope/idues/2021eligibilitymatrix.xlsx

I also want to note, there have been no changes to historically black colleges and Tribal colleges and universities designations in the Dashboard. Another update that we've made, if you recall from our previous webinars, US Territories and Independent Nations in a compact of free association with the US initially were not included in the Dashboard, but now they are included and are included in the state drop-down box on top of the dashboard.
And as a reminder, with the exception of Puerto Rico, ACS Census data, unfortunately, is not available for these territories and independent nations, and, therefore, do not reflect community threshold poverty analysis.

And final note, the CMC Anchor Community Eligibility Dashboard updates to that tool are effective as of September 9, 2021. So again, if you have any questions, please feel free to reach out to us.

This next slide is an example of the updates that we’ve made to include territories in that state drop-down box. You can see right there at the top it will bring up the applicable 15 mile-radius and institution name.

If you selected the About tab it includes the update information regarding the data that has been updated in the Dashboard. Again this is just a visualization of what you’ll see.

Now you can access if you’re a territory or an independent nation in free compact with the United States. Your information has now been included in the Dashboard.

As you scroll and get to the granular data, this is just another example of the visualization changes that we’ve made. For this particular example, American Samoa, as you can see, it’s now available as a state drop-down box. But as you scroll and zoom into the granular dataset of the census tracts, you will see it says no data available. And, again, I’m just highlighting that there, because that was not there previously.

If you are a territory representative of a school that is located in one of the territories or independent nations of free compact with the US, you can contact us and we can discuss the data that you can use, the data that you can provide, for the Anchor Community Poverty Analysis for your application and eligibility to CMC pilot program. So please feel free to contact us, and we can walk you through those alternative datasets, because your data is not reflected in this particular tool.

We are going to now transition into sort of what we call our top five issues and questions. And, again, these are really more so issues of clarification based on our outreach and feedback from you. I want to thank all of you for your willingness to engage with me and the program team here at the CMC office. And these issues reflect clarifications as a result of any ambiguity, and getting feedback from you for the need to provide more clear and concise information. So I am going to lead off first.
So, let's begin with consortia eligibility. Consortia are led by HBCUs, TCUs, or MSIs and include Minority Business Enterprises (MBEs), or tax exempt 501(c)(3) organizations.

Want to note: multiple MBEs and tax exempt 501(c)(3) organizations may participate in a CMC consortium project. Additionally, MBEs and tax exempt 501(c)(3) organizations may participate in more than one CMC application or project. And that's an important distinction there that we want to make.

Next, multiple schools may collaborate with the lead HBCU, TCU, or MSI to propose a project for CMC funding. However, there are requirements that you must be made aware of, specifically for consortia applications as follows:

Number one, participating schools must conduct programmatic activities within the qualifying anchor communities of the lead applicant institution.

Number two, schools that are listed as subrecipients in a consortia application are prohibited from submitting their own lead application for CMC funding or participating as a funded project participant in another application.

Number three, each consortia application must include a letter of commitment from an authorized representative of each member of the consortia.

And finally, the consortia application must include a table of funded project participants and all unfunded informal collaborators in the project.

For any questions see the NOFO, particularly Sections III and IV for more information. Also want to note that an eligible HBCU, TCU, or MSI may one, serve as the lead on one application, or again, participate as a subrecipient in a consortia application, but not both. We will be checking for this in the application review process.

So, again, you [can] serve as a lead application in one application, or participate as a listed subrecipient in another consortia application, but not both, right? However, an eligible HBCU, TCU, or MSI may serve as the lead on one application and an unfunded, informal collaborator with respect to a separate application.

Many of you have talked to us and given us feedback and wonder, “if we have a number of different schools that are located in the same geographic area, we serve the same student area, maybe the same anchor community area, we share the same student demographic, student location, student target. Can we
partner in an application?” In accordance with this, yes, you may. But again, you must adhere to the rules with respect to subrecipients as well as the consortia rules if that is the type of application that you put forth.

12:19
It is important to note it is the responsibility of each lead applicant to understand the requirements of the program specifically for the selection, identification, and oversight of subrecipients versus those of contractors.

12:34
So, for more information and details, see 2 C.F.R. Section 200.331 for the standards for making subrecipient and contractor determinations pursuant to a federal grant award. So, it’s important that you look at those regulations, understand those before you make those decisions in your project.

12:56
Then, finally, it’s been talked about before. We require letters of commitment from the funded participants, and any other significant partners in the proposed project. That must be submitted as part of your application. This is outlined in the NOFO.

13:12
The letters of commitment should one, detail the role of each member in the proposed project; two detail each member’s commitment to fulfilling the intent of the proposed project; and three, be signed by an authorized representative of each member of the consortium. So make sure that you look at the NOFO. We have specific rules and it lays out exactly what you must do in section four regarding a letter of commitment and the process by which you have to submit those with the application.

13:46
All right, so let’s transition to the next slide. And now I’m going to turn it over to Janice Wilkins, part of the CMC program team, who will talk to you about your current status as an HBCU, TCU and MSI. Janice, over to you.

Janice Wilkins

14:07
Thanks, Scott, and hello to all. The next question is: what action can take if my institution is not listed as an eligible HBCU, TCU, or MSI institution, or is not shown on the CMC Anchor Community Eligibility Dashboard, but I believe it is eligible for the CMC Pilot Program?

14:30
Please refer to the CMC Final Rule for the program’s utilization and classification of HBCUs, TCUs, and MSI institutions. HBCUs and TCUs are defined by the Higher Education Act of 1965. MSI status is also defined by the same Act and is granted by the Department of Education based on student enrollment.

14:57
The Department of Education maintains a listing of HBCUs, TCUs, and MSIs and they have a rigorous process for evaluation and qualifications. Please refer to the application guidelines, contacts, and requests for eligibility determination.
on the Department of Education's website provided below: https://www2.ed.gov/about/offices/list/ope/idues/eligibility.html3tips

I will now turn it over to Michell Morton, who will answer the next question.

**Michell Morton**

15:29
Thank you, Janice. Another commonly asked question is: Are satellite campuses, branch campuses or extension offices eligible for CMC funding?

15:38
If the satellite campus, branch campus, or extension office of the University of an eligible HBCU, MSI, or TCU has its own office of Post-Secondary Education Identification Number from the US Department of Education, then the campus or branch office may apply. This means that the US Department of Education recognizes the institution as a separate entity, and its students are eligible for Federal Student Financial Assistance under the Department of Education's Title IV regulations.

16:11
Next, Kevin Hughes will discuss eligible uses of funding under construction and networks.

**Kevin Hughes**

16:20
Thank you, Michell. Another commonly asked question revolves around the use of CMC funding for construction. The question being, what type of construction activities are prohibited from CMC funding?

16:35
The CMC Pilot Program prohibits traditional outside plant and network construction activities. For example, ground disturbance activities that requires state and federal historic preservation and/or environmental review approvals.

16:52
However, general in-building or classroom wiring, deploying fiber to existing conduit or trenches, installing wireless access/routers/ AP units, and installing wireless transmission equipment are not considered construction activities and would therefore be allowable under the CMC Pilot Program.

17:15
Another commonly asked question revolves around the use of funding for networks. The question being, can eligible entities use CMC funding for last mile or middle mile fiber optic or wireless connections to reach the campuses and/or serve the anchor community? The answer is no.

17:38
Eligible educational institutions may use grant funds to install or upgrade broadband facilities on a one-time capital improvement basis within their own campus locations. CMC funds cannot be used to construct, expand, or deploy broadband networks or facilities to surrounding anchor communities.
Broadband service subscriptions may utilize existing or new service providers. But CMC grant funds cannot be used to expand, deploy, build, or construct new broadband infrastructure facilities. With that said, that concludes my section, and we will now turn it over to the NIST office and our grants officer Mr. Ming Qiu. Ming, over to you.

Thank you, Kevin. Hello everyone. As they said, my name is Ming Qiu with the NIST grants office. Today, we would like to focus on a few application components. Specifically, I will provide an overview of important activities to kickstart your application process.

And we will look at the Application for Federal Assistance, SF-424 Form. This is a required form of your application package. And finally, we will spend some time discussing the budget preparation.

Let’s get started with the pre-application activities. All the steps are necessary to apply, because all applications must be electronically submitted through grants.gov. Ensure you’re taking care of this step as soon as possible to avoid submission delays.

Organizations must have a DUNS number [and] an active SAM registration. A federal assistance award cannot be issued if designated recipient’s registration in SAM.gov is not current at the time of the award.

DUNS and SAM registrations take can take several weeks. For SAM, a free annual registration process in SAM.gov generally takes between 3 and 5 business days but can take more than three weeks.

SAM registration should be done in sufficient time to ensure it does not impact the entity's ability to meet the required application submission deadline. Create [a] grants.gov account and add a profile.

This profile is essentially the applicant organization you as a user represent. You will need [your] organization’s DUNS number to add the organizational profile to your user account.

The e-business (Ebiz) point of contact will authorize the appropriate role to grants.gov user accounts associated with the organization. The Ebiz POC will authorize the AOR role. The person with this role will be able to submit your organization's application.
Next, to apply in grants.gov, you would need to create a Workspace, or be a part of a workspace. This is the environment that allows members to work simultaneously within the application. This will also allow you to route the application through the organization for review before submitting.

You will complete the Workspace and submit through grants.gov. Grants.gov recommends you submit your application package at least 24 to 48 hours prior to the close date. You can track the Workspace submission with the tracking number automatically assigned to the application.

I know that sometimes grants.gov goes down for maintenance, so you do not want to wait until the very last minute to submit your application. Also, grants.gov offers 24/7 support by phone and email.

While you work on various registrations, you can access the NOFO and application package in grants.gov. Required forms can be found as part of the grant opportunity package in grants.gov.

We’ll break this list down a bit more in the next slide. Listed application components, standard forms, and additional requirements that comprise your application. These are covered in detail in Section 4B, content and form of applications, of the NOFO.

Standard forms include the SF-424, the SF 424A budget form, the SF 424B Assurances for Non-Construction Programs. This form is required for applicants that have not yet updated SAM.gov entity registration since February 2, 2019.

SAM entity registration now includes the Federal Financial Assistance Certifications and Representations, or Certs and Reps. The final Standard Forms are CD-511 (the certification regarding lobbying) and the Standard Form LLL (for disclosure of lobbying activities, if applicable). Additional requirements would be attached to your application include the project narrative, the detailed project budget and the budget narrative, [and] the indirect cost rate agreement, as applicable.

Letters of commitment are required for consortium applications. Justification regarding compliance is in Appendix A of the NOFO and is required of all applicants.

Finally, the Certification for Minority Business Enterprises is required of all consortium applications that include an MBE. Refer to Appendix B for the
certification. If a consortium application includes more than one MBE, each MBE must submit his own completed certification.

23:25
Now, we're going to jump to the SF-424 form. Page one in section one and two, you'll indicate the type of submission is an application. The type of application is new. Section three will auto populate when you submit your application in grants.gov, so you do not need to complete that field.

23:43
You also not be required to complete fields for 4, 5A, 5B, 6, or 7. Complete section 8, the applicant information.

23:55
The legal name must match your SAM.gov registration. Also, the EIN, DUNS number, and the address must be associated with the legal name listed in your SAM.gov registration.

24:07
Please note in the address field, it does ask for the nine digit zip code, so the zip code plus four digits format. Section F is required. The contact person listed here should be the main point of contact of the person involved in the application. Typically, this is the authorized representative. You will need to enter their name, title, phone number, and email address.

24:31
The organization affiliation field is optional but is recommended.

24:36
Page two of the SF-424 Form starts to dive a little bit deeper into the funding opportunities. Section 9, this is the drop-down menu that is asking you to name the type of applicant organization. This is very important. I encourage you to reconfirm your organization’s eligibility by referring to the NOFO Eligibility Requirements.

24:57
More information on eligible applicants can be found in the NOFO on page 11.

25:02
For section 10, name the federal agency, this should be populated by the application package, but please confirm this is correct. It should display the federal agency as the National Telecommunications and Information Administration.

25:18
For section 11, the CFDA number, the CFDA is listed on the Funding Opportunity page on grants.gov on page one of the NOFO. For section 12, the Funding Opportunity Number is NTIA-CMCPP-2021.

25:37
The Funding Opportunity number and title can be found on the first page of the NOFO or in grants.gov.
Section 14 is not required but is highly recommended to be completed if you will have multiple areas affected by the project. You can add a Word document or an Excel sheet if you have more than one area affected by the project. Section 15, you will enter a descriptive title for your project. I wanted to highlight that this section [is used] for attaching the required documents – it is easy to miss.

The instructions are provided in Section 4.D. of the NOFO. The attachments you prepare, such as the budget [and] project narrative, you will have to add to your application package. You will do this through the SF-424 form, specifically in item 15 of this form.

There is an Add Attachments button. This is the item listed in Section 4, Paragraph B.6. through B.11., and Section 4, Paragraph C of the NOFO.

Page 3 of the SF-424 Form, Section 16 requires you to list the congressional districts. Box A is the applicant box. It is the congressional district where the applicant organization name in Section A of this form is located.

For box B, the program project box, should contain all congressional districts for the service area you noted in section 14 of this document. You can attach a spreadsheet or a Word document if more congressional districts will be impacted by the project. If you do not know your congressional district, please go to www.house.gov to search your congressional district.

For Section 17, your organization proposed project start dates should follow the NOFO guidance. The proposed start and end date should be listed as a two-year period of performance starting after March 12th, 2022. Please be aware that only your official document from NIST [and] NTIA will determine your period of performance.

Session 18, this funding section should show the total project budget. In row A you will enter the total federal funds amount you are requesting. There is no match required for this program.

If you are contributing match, enter a match amount in the fields B, C, D, or E, depending on where the funding will be coming from. Make sure your budget listed here matches other application requirements, such as SF-424A detailed project budget and the budget narrative.
Section 19, the Executive Order 12372 highlights the inter-governmental review of the federal programs. Applications under this program are not subject to Executive Order 12372.

Section 20 is required. If your entity is delinquent on any federal debt, you need to check yes and provide an attachment explaining the debt.

Section 21 is also required. Please read the section carefully and certify the accuracy of this form.

The last section, the authorized representative information, must be also completed. The authorized representative should be a signatory authority for the applicant organization.

When application package is submitted through grants.gov, the name of the organization applicant with the AOR role that’s submitted the application is inserted into the signature line of the application, serving as the electronic signature.

The Ebiz POC must authorize the individuals who are able to make legally binding commitments on behalf of the organization as a user with the AOR role.

For the budget we will focus on three components – think about this as a progression. We will start with the high-level view of the budget, with the SF-424A for non-construction programs budget, then move to the budget spreadsheet, and, finally the budget narrative.

Before going over the SF-424A form, I want to note that grants.gov does have instructions available for this form on the website, which is another helpful resource for you.

Page one of the SF-424A is a budget summary page. As a new applicant, pay close attention to section A, column E specifically to make sure the amount you enter and request in this section matches the dollar amount for your budget. I’m going to share an example of age two of Section B, of the SF-424A form. This is the overview of the total budget. Pay close attention to the object class categories when you are building out your budget.

As shown here, you allocate costs according to these categories. The CMC period of performance is two years. When you complete this form, input costs associated with year one in column one, and costs associated with year 2 in column two.
The totals fields are calculated as you complete the form. Verify the total requests that reflect the same amount as Item 18 in the SF-424.

I will provide some context for these cost categories.

Personnel, this refers to salaries and wages paid to employees of the grantee organization who are directly involved in grant implementation. This line item does not include personnel hired by subgrantee. Those costs are included in contractual line item fringe benefits.

Fringe benefits are allowances and services provided to employees in addition to regular salaries and wages.

Travel refers to travel costs of personnel that are necessary and reasonable to effectively manage and carry out our grant activities or provide oversight.

Equipment is a single item of tangible, nonexpendable, personal property that has a useful life of more than one year and a value of $5,000 or more, or a cost capitalization threshold established by an applicant organization that is less.

For example, an applicant may classify equipment at $1,500 with a useful life of a year. Supplies are items costing less than $5,000 per unit. That’s the federal definition, often having one-time use.

Contractual – the cost of any contract or subaward agreement. A subaward is considered an award provided by a pass through entity to a subrecipient for the subrecipient to carry out part of a federal award received by the pass through entity. In determining whether an agreement between a pass through entity and another nonfederal entity casts a latter as a subrecipient of a contractor. The substance of the relationship is more important than a form of the agreement.

For subaward, the terms and conditions of the award flows down to the subrecipient. And the pass through entity is responsible for ensuring the subrecipient complies with the terms and conditions of the award.

A contract is a considered a legal instrument, whereby an organization purchase property or services needed to carry out the project under a federal award.
Your organization must establish written procurement policies and procedures that consistently apply. Construction – activities related to construction are not allowable under this program.

Other – this category includes expenses not covered in any previous budget category.

Indirect charges – indirect costs also referred to as facility administrative costs. Costs that cannot be specifically identified with a particular project [or] program activity, but are necessary to the operations of the organization. Facilities, operation and maintenance costs, depreciation, [and] administrative expenses are examples of costs usually treated as indirect costs. Do not include costs associated with indirect cost rate as direct costs.

As noted in the NOFO, the CMC Pilot Program does not contain a cost sharing or matching funds requirement. However, an applicant may propose to contribute a binding, voluntary committed nonfederal cost amount. Make sure to complete section C, nonfederal resources, if you propose such a nonfederal cost share.

Next, we will talk about preparing project budget and budget narrative. These two different documents [that] will fully describe the project activities and associated costs.

Format the detailed project budget as a spreadsheet. In the project budget, provide a detailed and itemized breakdown of each line item within the cost categories used in the SF-424A.

Spreadsheet must be formatted to fit letter size paper 8.5 x 11.

The budget narrative must be concrete and specific. It must provide a justification for the basis of each proposed cost in the budget. Proposed costs must be reasonable, allowable, allocable, and necessary for the supported activity. Format the budget narrative as a Word document.

Again, by marrying the SF-424A cost categories and the information from the spreadsheet, you will provide and offer an extra level of clarity. In the next slide, we will describe the type of information and level of details recommended to justify the budget costs.

In the detailed project budget is where you will provide detailed breakdowns or calculations for project costs. Again, we will walk through each of the cost
category and explain the type of cost breakdown suggested to justify the proposed costs.

35:51
Personnel - list all staff positions by title, provide an annual salary rate, [and] the percentage of time to be devoted to the project. For example, let’s say you have a trainer anticipated to devote 50% of his or her time at a $50,000 salary level. The calculation will look like $50,000 x 50%. And the requested amount for this line is $25,000.

36:19
Fringe benefits - list a staff position from personnel, specified, salary level charged from personnel and the fringe rate. Using the trainer position from our last example, the cost calculation will look like $25,000 x a 35% change rate, and the requested amount for this line is $8,750.

36:44
Travel – budget for individual trips. In your calculations, include costs [such as] associated mileage, flights, per diem, and lodging.

36:53
Equipment – specify each item and quantity, include the purchase cost of the equipment, and the percentage dedicated to the project.

37:04
Supplies – list each item or group of similar items. Your calculation will be quantity times the unit costs. Another example: let’s say you plan to provide laptops to 100 students and each at a value of $500.

37:26
Contractual in subaward agreements – specify the total cost of each agreement and include an itemization.

37:34
Other – these costs breakdown will basically be quantity times unit costs.

37:40
Finally, for indirect charges. The cost calculation is base times the approved indirect cost rate. Make sure to verify the base used to determine indirect costs.

37:51
All costs proposed must reflect only allowable costs that are consistent with the project scope.

37:57
Information on allowability is available in the Uniform Administrative Guidance requirements cost principle, and they are the requirements for federal award, and 2 C.F.R. 200, which applies to awards in this program.

38:14
We covered general principles for costs allowability in the July webinar.
In the budget narrative, you will clearly relate each of the activities proposed in the project narrative to narrative section of the project budget. We talked about what each of the cost categories are and how to display the costs in the project budget spreadsheet.

Now, we will walk through the cost categories and explain what sort of information to include in the budget narrative to justify the proposed costs.

Personnel – the narrative will provide the name (if known) title of the position, and the explanation of the roles and responsibilities of the position as it relates to the objectives of the project.

If the proposed position is vacant, identify the anticipated hire date. Position must be relevant and allowable under the project.

Fringe benefits are for personnel listed in the previous category, and only for the percentage of time devoted to the project. Fringe benefits may include, but not limited to, the cost of leave, employees on health insurance, pensions, and unemployment benefits plans. The budget narrative should delineate your organization’s fringe benefit rate.

Travel – provide the proposed travels with destination dates (if known) and describe the purpose of travel and specify the basis for itemized costs. If your organization does not have documented travel policy, the federal GSA rates must be used. If specific travel details are known, the basis for proposed costs should be explained, for example, historical information.

Equipment – you must include relevant details, such as type of the equipment, cost, and a brief narrative on the intended use of the equipment for the project. The justification should include information about how the costs were estimated, for example, fair market value, quotes, et cetera.

Supplies – the justification must include an explanation of type of supplies to be purchased [and] how supplies relate back to achieving the project objectives. The basis for the estimated supplies, for example, historical use on similar projects.

Contractual – you need to list the name or entity identified the proposed contract activities, and explain the type of goods and services needed to carry out the project. Provide a brief description of the scope of work, and specify specific tasks to be performed. Include date [and] length for the performance.
It's important to justify the necessity of each contract as it relates to the project narrative. Also note, recipients are responsible for monitoring the activities and expenditures of a subrecipient – sometimes referred to as subawards or as subgrants – and vendors, and are responsible for ensuring all solicitation documents reflect activity within the scope of the CMC Pilot Program.

Other – describes the items included in this section and explain the necessity of each cost for the successful implementation and completion of the project.

For indirect charges, if indirect costs are included in the proposed budget, provide a copy of the currently approved negotiated rate agreement if this rate was negotiated with a cognizant federal agency.

Applicants charging indirect costs but have not yet established an indirect cost rate with a cognizant federal agency will be required to obtain such a rate in accordance with Section B.O.6. of the Department of Commerce, Financial Assistance Standard Terms and Conditions.

On the other hand, applicants [that] do not have a current negotiated rate, including a provisional rate, may elect to charge indirect costs using the de minimus rate of 10% of the modified total direct costs. This is in accordance with 2 C.F.R. 414F.

Finally, here are helpful resources to inform your application and budget preparation.

Thank you for your time today. My contact information is here for you to send any grants management questions.

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Now Dr. Francine Alkisswani will discuss CMC data collection and evaluation.
Good morning and good afternoon, and thank you all for joining today's webinar for the Connecting Minority Communities Pilot Program. Thank you Ming, for your thorough presentation of this important information.

Now, we have to go into another important topic: that of human subjects protection.

Your project narrative must include a project results and evaluation section that is intended to include a description of your project's intended results, and how you plan to evaluate the benefits of your project.

A description of performance measures that will be used to evaluate project success and the benefits delivered to projects of your target population, and those proposed metrics – the data planned for collection and other evaluation methodologies, such as case studies, focus groups, and surveys.

Now, before moving on any further, I want to step back a moment and think about the fact that, well, project evaluation is only five points of your overall project plan. These are an important five points.

The project evaluation reviewers will assess the extent to which the project gathers data and conducts an evaluation of the program activities that have been funded by the grants that are to determine their effectiveness and to develop best practices to facilitate broadband connectivity, digital inclusion, and broadband adoption.

Now, the costs for an evaluation, including that of a subaward or contract evaluation are allowable expenses. Now, why evaluation? One, necessarily, a part of your project narrative.

Secondly, the costs are allowable. But, I say, more importantly, based on my many years of experience over three grant programs at NTIA, and even prior to NTIA, and in evaluation and research, I think it would be safe to say that most social innovations do not continue beyond the point of origin. If they fail, they tend to fail the sustainability and replication test.

Why? My experience would, and I think that of other project evaluators and program evaluators, would say they have not been invaluable. The basic documentation, the startup information, have not been collected to allow for the basis for which an evaluation could be conducted.
The programs to be developed under the Connecting Minority Communities Pilot Program are intended to be innovative models, such that they have established a basis for sustainability, replicability, and potential spinoffs. This makes it imperative that grant applications do have a rigorous evaluation plan that lays the foundation for evaluability, replication, and measuring social impacts in the long run.

We’d say that evaluation is a means of monitoring the implementation, new programs, and it does make possible mid-course corrections providing valid and reliable evidence regarding program planning, operations, and effectiveness of achieving goals.

One key question for CMC evaluations will be: was the project proposed implemented? Let me say that again – was the project that you designed will be invaluable to NTIA in fulfilling its requirement to submit a report at the end of the project period?

On what works, or does not work, [and] what is needed in the future?

So, we’d like to stress the fact that we expect that project evaluation be an integral component of your project implementation plan and that project evaluation activities should begin with day one of your project.

Now, we expect that most of your project evaluations will be formative evaluations to include needs assessments evaluability assessments, implementation, and process evaluations. And it is also most likely that CMC project evaluations will not fall into the category research.

Nonetheless, NTIA is required to make a determination of whether or not a project evaluation plan meets the definition of human subjects research, so now, let’s go over these requirements.

So, the question here is whether or not your project results and your evaluation plan are considered human subjects research under 15 C.F.R. Part 27.

I’m going to go over these very basic conditions for human subjects research protection. However, I want you to know ahead of time that the link to this 15 C.F.R. part 27 will be posted on our CMC site, and you will be able to find this presentation on our website and further information about human subjects research. So, don’t bother to take notes, just sort of get the high level information, and you will have time to look over it in more depth in the future.
But our step one is determining whether or not your project evaluation activities do satisfy the condition of being research. First step, and research under [15] C.F.R. Part 27 is the systematic investigation, including research development, testing, and evaluation that is designed to develop or contribute to generalized knowledge.

Step two, we want you to determine if the intent of your evaluation plan and your data collection is to produce generalizable knowledge.

Activities designed to contribute to generalizable knowledge are those designed to draw general conclusions to inform policy, or generalize findings beyond a single individual or an internal program. I’d like to suggest that much of what you will collect in terms of your data collection plans will be used to help you assess mid-course corrections.

Step three would be to determine whether your data collection activities do involve human subjects. By that, we mean a living individual about whom an investigator conducting research, obtains information through intervention or interaction with the individual, and use studies or analyzes the information, or obtains uses, studies, analyzes, or generates identifiable private information.

You will find these four other basic definitions that will help you in making this determination in 15 C.F.R. 27.102. And that pertains to intervention, manipulation of the subject or the subject’s environment that are performed for research purposes.

Interaction – are you communicating or having interpersonal contact between the investigator and the subject? Private information, we run across this all the time.

Does the information you’re collecting, contain specifiable information about the subjects, in which that individual can reasonably expect that no observations or recordings are taking place and that the information is then provided for specific purposes by an individual, and that that individual can reasonably expect it not to be made public, such as medical records, and finally identifiable private information.

We run across this all the time and many of our surroundings. So it's private information for which the identity of subject is or may readily be ascertained by the investigator or associated with the information. This is identifiable private information.
This slide gives a summary of what the Department of Commerce Standard Terms and Conditions are that we must comply with. There is 15 C.F.R. Part 27. And the Department of Commerce requires that this is incorporated into every federal grant and into the CMC grant. It requires that nonfederal entities maintain appropriate policies and procedures for the protection of human subjects. In the event it becomes evident that human subjects may be involved in your project, you, the nonfederal entity, must submit appropriate documentation to the federal program officer for approval by the appropriate Department of Commerce officials.

And I’d like to say, it’s also the case that these terms and conditions apply not only to the primary grant recipient, but to any subaward, or to any contractor, particularly if it is conducting research or evaluation. The costs for evaluation are allowable, and that does include the subaward for conducting the evaluation or a contract for conducting an evaluation, and the same terms and conditions apply.

So that documentation establishing approval of an activity in that project by an institutional review board, which we’ll call an IRB going forward, under a federal-wide assurance issued by the Department of Health and Human Services, or any other federal agency. Those guidelines are in 15 C.F.R. 27.103.

The documentation must include support for an exemption for any activity in that project, under this same 15 C.F.R. [27]. There must be documentation of IRB approval of any modification to a prior approved protocol, or to an informed consent form.

Documentation of an IRB approval of continuing review approved prior to the expiration date of the previous IRB, and finally documentation of any reportable events, such as serious adverse events, unanticipated problems resulting in risk to subject to others, and instances of noncompliance.

Now, this has been an overview of why we regard evaluation is important, but not only why we regarded as important, but why it is important, and particularly important for the Connecting Minority Communities Pilot Program.

A pilot program is based upon wanting to inculpate, to help you develop innovative projects. Those innovative projects will be supported by strong evaluation plans and by the data you collect to support that. Of the department’s regulations related to the protection of human subjects, can be found at 15 C.F.R. Part 27 and CMC guidance, and further explanations of this requirement will be posted to the NTIA website. I thank you for taking time to
go through these issues pertaining to human subjects protection. And now I would now like to turn it over to my colleague Pandora, please. Thank you.

56:15
Thank you, Francine. I'd like to first thank everyone who has expressed interest in becoming a volunteer merit reviewer for the CMC Pilot Program. The levels of experience that we're seeing are impressive, so we greatly appreciate your support. However, we still stand in need of merit reviewers.

56:37
CMC merit reviews will start in early December and extend through January of 2022.

56:43
We are committed to ensuring that reviewers come from diverse backgrounds and areas across the United States. So we’re looking for anyone with a strong background working with minority communities or minority serving institutions. We’re looking for higher learning educators, anyone with a strong background in telehealth, telework, distance learning, digital inclusion. Once again, our IT professionals, we need you CIOs. Send us your resumes, and ensure that they include the information listed here, your name, contact information, former employers, your position and title, and your years of experience. That’s important to us.

57:28
For potential grant applicants also interested in being a merit reviewer, we have implemented mechanisms to address any potential conflicts of interest, so you would be able to do both.

57:40
Also note that the submission deadline for resumes has been extended through October 31st, 2021, so please send your resume to grantreviewer@NTIA.gov to be considered. I'll now turn it over to our moderator Cameron Lewis who will facilitate the Q&A session. Thank you.

58:22
So now, I have the pleasure of going through some of the questions that you guys have submitted in the chat. At this time, feel free to pop any questions that come to mind into the chat, and we will address them. If we do not, I promise there will be time in the future to get to it. With that being said, I would like to open up to the entire panel.

The first question is: Does an applicant have to apply as a consortium?

58:55
So I will take that question.
No, you don’t have to. It’s one of the options, so that you can apply either as an individual institution or as a consortium application. I would just refer to the NOFO, the Notice of Funding Opportunity, or the CMC Final Rule for the background and any other additional information that you may have. But to answer the question directly, no. You do not have to submit an application as a consortium.

Ok, perfect, and since we have Scott on the ball here, second question that is directed for you. Can you provide clarity around whether an application with multiple MSIs can collaborate with one MSI as the lead and others as sub recipients?

Yeah, so let’s, let’s talk about that, because I did present that in the webinar. In a number of different scenarios when we talk to representatives during our outreach process, and I want to distinguish this. Number one, as stated in the webinar: multiple schools, particularly in geography, in the same geographical areas, they can collaborate. They can collaborate on an application with the lead institution taking the lead. Other institutions can be listed as sub recipients. But if they are listed as sub recipients, they cannot then submit an application on their own behalf as individual institutions of higher education are eligible institutions in the program. When we spoke to many of you, so, I guess some of the confusion was, you know, if a school participated as a sub recipient, right, a designated recipient of federal grant funds, could they also submitted an application on their own. They can’t do that. That would be double dipping in Federal funds and that would not be allowed, but your collaboration as an unfunded, informal collaborator, or as a designated sub recipient, then, you know, obviously, would that lead institution yes you can.

If we know other institutions in our region that are submitting an application, but we want to keep our applications separate, will one institution be given priority over the others, and are multiple awards given per region?

The priority, we don’t give up certain priority, or a certain institution or different types of institutions. All the applications are evaluated on their merits as outlined in the NOFO, in terms of the selection criteria. So, in terms of regions, I’m assuming you are, they are talking about multiple institutions within a 15 mile radius or serving the same anchor community census tracts. So basically, we do encourage folks to basically communicate with each other on a regional basis. But no, you are not prohibited from, from submitting applications, and different institutions can submit applications that may even serve the same region, but you must have different program purposes, and for different, different populations that you want to serve. For example, if you’re serving your own students and the other institution is serving their own students, even though there might be geographic overlap, that’s fine. If there
are significant differences in the programs, like, one is a community telehealth, or community health program, and one is a STEM training program, even if they're in the same region those are sufficiently, sufficiently different program purposes. Basically though, as Scott mentioned in terms of duplication, that's something that we would, we would look at and see if programs weren't directly duplicating each other. And that would not be allowed, that kind of duplication.

1:03:43
Scott Woods
If I could just follow up on that for the audience here, and that's a really good question. But again, you go back to the NOFO, you can go back to the final rule. One of the fundamental criteria of this program, the schools must present their greatest unmet financial need. Right? That element, that requirement is statutorily designated. It's in our application review process. If you look at the NOFO we explain how we're going to review all of the applications and you know, rank them, so to speak, based on that, that need requirement. So I would refer back to the NOFO, particularly the application review requirements that are contained therein. And then reach out to us for any additional questions or clarifications you may have, about that specific process.

1:04:36
Cameron Lewis
So, with this question, I would like to open it back up to the entire panel. I would like to hear all you guys' voices today. I will present this question. Can our proposals include costs to make our systems and policies secure so we can protect human subject data collected throughout the project?

Scott Woods
I'll take that, So, to the extent that, you know again, we provided examples in the NOFO, right? Cybersecurity, protection of your data, encryption of systems, you know, is a fundamental component of securing and providing remote educational instruction, right. So, to the extent that you look at the examples that we provide, and particularly the purposes, if you look at the section of the NOFO where it says your project must address at least one of these purposes, if it fits within that broad framework that we've outlined, then yes. You know, again, we don't want to necessarily be lead witnesses and applications, So we don't want to say, you know, necessarily bless one approach or the other, we're asking you to do is look at the NOFO, look at the requirements that we've set in. We understand that there is broad leeway there and we're counting on our institutions of higher education to be innovative in their approaches. But again, we also realize there are just some basic needs across these institutions that, you know, your application may just be for equipment, for your target in-need students, and that's OK. So again, look at those statutory purposes. Look at the examples that we set in the NOFO, and then govern your project and application as such.

1:06:36
Cameron Lewis
Can multiple SF 424A budget form and narratives be submitted to support the separation of programs and activities in an application?

Yongming Qui
1:07:14
So, as the applicant submit one application for that program, and one SF 424A budget form should be submitted for an application. So, if I understand the
question correctly, assess multiple use of multiple use cases as separate program activities, I'm assuming it's one application. Within the application, there are multiple activities within the application. So one application 424A should be submitted on the application. You can use a detailed project budget, and the project narrative to explain each of the costs and break down each of the costs within SF 424A, and provide a narrative explaining the activities that are located in the SF 424A. So, the short answer would be one SF 424 is submitted for the application.

Cameron Lewis

Can a local telecom broadband service provider that provides broadband services to a local community college apply for a submarine cable repair to provide broadband services to a school?

1:08:34

Kevin Hughes

I think, in specific instances like this, we would really ask for the applicant, the potential applicant to contact us directly on questions like this. There is room for what is being talked about, but I think, like I said, that the question is very specific, and I think that this would be something where it would be appropriate for you to contact the team directly for a response on this question.

1:09:10

Cameron Lewis

I believe that is a fair assessment, based on a case-by-case scenario. Something with those specifics, we do need to have a deeper understanding of this scenario.

1:09:26

May an MBE or 501(c)(3) be in multiple consortium?

1:09:32

Scott Woods

Yes. Yeah, we addressed that on I think the first slide of the consortium, first presentation, you know, multiple MBE’s, and again, tax exempt 501(c)(3) organizations, I want to make that the designation. So it's not just a not-for-profit or community based organization in your consortia application, consortia application. That entity has to be a tax exempt, a 501(c)(3) organization. But yes, multiple MBEs or multiple tax exempt 501(c)(3) organizations may participate in more than one application, whether that be, a lead applicant, whether that be a consortia. You can do that. That’s allowable.

1:10:20

Alright, and to the entire panel, my question would be, is there a preference to apply as a consortium or as a sole institution of higher education?

1:10:30

Scott Woods

No preference will be given. We can answer that pretty easily. It's really, the eligible entities that can apply, it's out in the (final) rule. It’s out in the NOFO. We don’t give any priority consideration beyond what is stated in the NOFO. So, there’s no one preference that will receive priority status or treatment over the other.
And, additionally, when we talk about a consortium, a consortia. Of course, the university or anchor institution has to be the one applying for the application. Anyway, so, I just wanted to provide that additional clarification.

My next question, I will open up to Emy or Scott. If an entity does not fall into one of the four subcategories per the DOE, but it is an MSI based on enrollment population, are they eligible either as a lead or a sub-applicant?

So, as a sub recipient, if an eligible institution decides to partner and have a subrecipient, that any institution is actually eligible for subrecipient status. However, to be a lead applicant, they have to basically have the Department of Education designation as an eligible minority serving institution. So, in the end, we actually use the 2021 eligibility matrix for the Department of Education, Title III, and Title V programs to determine that, so that is the basis. So if an organization may be listed on the CMC dashboard, or may be listed as a particular category because they have a certain level of enrollment, of minority enrollment. For example, a certain level of the HSI, Hispanic Serving Institution, that, meets a certain threshold. They may be potentially eligible, but, if they are, they do have to actually provide to us proof that the Department of Education has granted them a waiver of the core expenses, and the student criteria. Because, beyond the actual minority enrollment, the Department of Education also factors in the income level of the students. But in the end, we actually do base our eligibility on the Department of Education eligibility criteria.

This is a question about grant acquired property. According to the grant it must be held in trust by recipient. Are there exceptions? For example, computers that are issued to families to read with their children, would they be required to return the grant acquired property at the end of the project?

Yeah, that's a really good question. We determine a lot on the useful life of, and so there's a useful life schedule, but as long as the government does have a security interest in that property for the useful life. And so again, we'll have much more details on that with your award conditions for those that ended up being funded and moving forward. I will definitely advise you as to your responsibilities with respect to protection of the government security interest in that particularly with grant funding property. But you can generally get information on the security interests are grant funded property in the OMB regulations, in the DOC regulations that govern the grant rules and requirements. So, that's a really good question. We will get to that. We will cover that as the recipient. As the applicant moves to the recipient status, and understanding those rules and obligations that move forward with that, we definitely will cover that with those that end up being funded.
Now Ming I’d like to come your way regarding eligible expenses, eligible cost. What is said about supplies that is under a $5000 limit?

So, the federal definition for supplies is basically $5000 or less to have a useful life of less than one year with one time use, basically so even it depends on also the recipient's threshold or equipment. If the recipients have a lesser capitalization threshold for equipment, even though the supplies made less than $5000, that is also considered as equipment really depends on these agencies policy on the equipment threshold. So, if another entity’s capitalization threshold is $5000, anything less than $5000, that would be considered supplies, not equipment. If the threshold is $4000, so anything under $4000 would be supplies, and anything above $4000 will be equipment. So, it really depends on the federal agencies policy on equipment capitalization threshold.

So, regarding a potential applicant, if a Tribal college has six satellite campuses that serve native students from various regions, should each campus submit their own application?

I think that, that question, that brings into play our eligibility community dashboard. And I always encourage applicants with these type of questions to use that tool, which is located on our website. And so, in response to that question, you would have to determine if all of the satellite locations are listed on the eligibility dashboard. That's the first question that has to be determined. If not, then only the institution or the campus, rather, that is listed would be the one that is able to submit an application. So, the conversation sort of starts from there. But, again, for more specifics, that, again, would be a good question to reach out to the team so that we can delve more in depth on that. Our job or our role here, is to really help with, with specific questions like this. I would encourage you to reach out to us on that.

Also elaborate the CMC dashboard is, again, based on Department of Education information, so it really depends on if these different campuses are considered different institutions under the Department of Ed. and how the different, each has a separate Department of Education identification. Or if they are considered under one ID for the Department of Education. So, again, we are using Department of Education's designation for these different institutions, and whether the Department of Education recognizes them as separate institutions, or the same institution.

Emy, I believe there is another question coming your way. Would it be appropriate to ask for laptops or broadband services for commuting undergraduates, who attend our institution through face-to-face cases, but live and study at home without broadband capabilities?
Yes. If you actually read the NOFO under eligible expenses, devices, broadband equipment, and devices and broadband services to be used for the purposes of remote education are explicitly allowed under this grant. We have an FAQ entry, but it is in NOFO as well.

Alright, and I would like for us to spend some time addressing our two-year community colleges. Are there any tips for two-year community colleges to gather student data, such as unemployment data, etcetera?

I'll take that. We actually put a footnote in the NOFO with respect to the data and the criteria on student need. Again, we do understand that the data on your student body, particularly Pell grant information, financial aid information. That information is readily available. All of the institutions report on that data to the Department of Education through the IPEDS report through other reports. Specifically, criteria 4, 5 and 6, unemployment, low-income status of students. We understand that information may not be readily available. And again, so we're asking to the extent that you have information, you have that information, report it. If you don't, don't worry about it, because we don't prioritize those. Those are just examples of data, of information that's applicable to your low-income in-need status of your student body. So, again, programmatically we do understand that some of that data will not be available for the schools to report on. You just don't know. And so we're not going to use that, the lack of that information against you.

However, to add to that, if you do have information, for example, from the census about income status and size of the communities that you serve, that can be useful. Not only for us, but also for you as you design your program.

And I'll add too. If you look at the NOFO and you read that section, it does have an ability for the applicant to provide supplementary information to explain the data. Right, so again, its not just the data itself, the raw numbers, it is actually the context and the nuance that you put on that data, again, or to the target population that you want to serve in your project. So again, I just ask for you to read through the NOFO very carefully and address all of the criteria as we laid out in that NOFO.

Absolutely. Now, at this time, we're coming up on about our last 10 minutes of our webinar. So, I would like to take the opportunity to run through each of our panelists, see if you guys have anything that may have been missed, or anything that comes to mind, that would be beneficial to our audience. I would like to ask Kevin if there's anything you have to present.

Yes, just really quickly, we had mentioned during the top five questions, the subject of construction. So, I just wanted to make very clear to all attendees: the
grant funds are not able to be used for new construction. You can, however, do work with regards to existing conduits, or upgrades to your existing connectivity infrastructure. If you wanted to do something that regarded new fiber installation or things of that nature, that cannot be covered by the grant, that would have to be done utilizing other funds. I just wanted to make sure that we're clear on that, that we do understand some, some folks, they're interested in connectivity, but you have to really look at the NOFO carefully and follow the guidelines that are given with regards to that subject. Now, you are, of course, able to do Wi-Fi, or wireless, rather, connectivity, that is not considered as construction. So you're able to do that, for example, with regards to connectivity issues. So that's what I wanted to just add really quickly.

1:24:39
Scott Woods
If I could just piggyback on that, by other funds, he means you can pay for yourself. A third party can pay for it, but federal funds, or at least from the CMC program, cannot be used for outside plant construction. So, other funds would be pay for it yourself. Or get the third party to pay for it.

1:25:00
Cameron Lewis
Alright, and at this time, Scott, I would ask you to continue on if there's anything you have to bring to the table.

1:25:07
Yep, thank you. I want to thank everyone for joining us today. I would just add that we have, we hear all of your questions. There's not enough time to get through all of the questions, unfortunately. However, we do produce frequently asked questions. We do have upcoming that will be up this week, our round three FAQs, so we will put that on our website. We'll notify you accordingly to the round three FAQs that will go up. Subsequent FAQs will go up based on our scrubbing and review of the questions asked, not only just of our outreach, but also from the webinar that we did not get to. So, stay tuned for that as well. And, again, just feel free to contact us, the program team directly for any other questions that you may have. Or if we did not get to your question today, please feel free to reach out to us. I would also add that the Human Subjects Protection Guidance will also be up on our website shortly. Again, we will notify you when that information, when that guidance is up, and then we'll be able to address any questions you may have regarding HSR once that guidance is indeed up and ready to go, so thank you.

1:26:24
Emy Tseng
Sure. I guess, I'd just like to say that I think there is some open questions about the eligibility, particularly the definition of MSI. So, we actually do go into that in more detail in our upcoming FAQs. But again, I just want to emphasize that and some of the data and distinguishing what's an institution, what's a separate institution versus a branch of the same institution. We're really basing our process on the Department of Education. So, definitely, not only, you know, come to us, but if you have a question about your own designation within the Department of Education, please look at those resources, as well.
Follow up on that, Emy. So, we've also done previous webinar content, where we've broken down all of the eligibility requirements, and the methodology of how our calculation of that, by including the anchor community eligibility dashboard that represents both the Department of Education information, as well as our application of the 250% of the poverty threshold. That data analysis that we've talked about. We've also produced content on those specific data sources that are available. They're all publicly available data sources that you can access the Excel spreadsheets and the underlying base data yourself. So if you look at our website, look at some of our previous content, back in May and in June from our CMC webinars. We provide those resources and links for you in those presentations as well as an overview of the methodology of some of the components of eligibility in the program. So, please review those first, and then to the extent that you have any questions, please feel free to reach out to the CMC Project team for additional questions and assistance.

Thank you to everyone for the participation on today's webinar. I just want to add to what I kind of explained earlier, regarding equipment and supplies, what is the threshold. So, 2 C.F.R. 200 has a very clear definition of what is considered supplies and what is considered equipment. So, I would encourage you to take a look at that, and have a clear understanding, you know, how to classify those two items as equipment or supplies.

Cameron, I just wanted to add really quickly before we run out of time, just as a reminder to everyone on the webinar today. You know, the application window for the CMC grant is open. So, if you are ready, if your institution is ready, you can move forward with presenting that application. However, if you do have questions, as we've stated earlier, please contact us directly so that we can work with you in terms of answering those questions, so that you can move forward with your application. But, again, we're very customer centric, we are here to serve, and happy to help you with any questions that you have.

Thank you so much to our audience for being here. You all are amazing. You are the reason that we put in this hard work, and if there's anything we can do, this is what we are here for. Coming up, you will see a few slides that will talk about our dates for our upcoming webinars, as well as contact information. Our next webinars are coming up October 20th and 21st, so we hope to see you all there. And on the next slides, you will see contact information for the CMC teams. And with that being said, thank you so much for your time and thank you for being here. We look forward to seeing you in the future.