Connecting Minority Community Pilot Program- Session 6b

Moderator: Cameron Lewis
September 23, 2021

Carole Garner
1:41
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.

2:05
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.

Cameron Lewis
2:36
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.

2:48
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.

3:02
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.

3:13
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.

3:45
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.
4:02
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.

4:14
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.

4:28
At this time, I would like to invite Scott Woods to the main screen to bring you our CMC program updates. Scott?

4:41
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.

5:02
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:

5:30
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.

5:55
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

6:04
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.
9:34
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.

9:49
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.

10:13
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:

10:34
Number one, participating schools must conduct programmatic activities within the qualifying anchor communities of the lead applicant institution.

10:45
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.

11:05
Number three, each consortia application must include a letter of commitment from an authorized representative of each member of the consortia.

11:15
And finally, the consortia application must include a table of funded project participants and all unfunded informal collaborators in the project.

11:27
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.

11:35
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.

12:23
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.

12:57
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.

13:12
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.

13:34
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.

13:50
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.

14:28
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.

14:45
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?

15:09
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.

15:35
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.html

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

Michell Morton

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

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

Kevin Hughes

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?

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.

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.

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.

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.

24:03
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.

24:21
You also not be required to complete fields for 4, 5A, 5B, 6, or 7. Complete section 8, the applicant information.

24:33
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.

24:45
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.

25:09
The organization affiliation field is optional but is recommended.

25:14
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.

25:35
More information on eligible applicants can be found in the NOFO on page 11.

25:40
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.

25:56
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.

26:15
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 is that in this section 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.

36:29
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.

36:57
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.

37:22
Travel – budget for individual trips. In your calculations, include costs [such as] associated mileage, flights, per diem, and lodging.

37:31
Equipment – specify each item and quantity, include the purchase cost of the equipment, and the percentage dedicated to the project.

37:42
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.

38:02
Contractual in subaward agreements – specify the total cost of each agreement and include an itemization.

38:12
Other – these costs breakdown will basically be quantity times unit costs.

38:18
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.

38:29
All costs proposed must reflect only allowable costs that are consistent with the project scope.

38:35
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.

38:52
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.

56:52
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.

57:16
CMC merit reviews will start in early December and extend through January of 2022.

57:21
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.

58:07
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.

58:18
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.

58:49
Alright, thank you so much Pandora, and thank you to all of you, the audience that have been here, to all the merit reviewers that have sent in their resumes already, we appreciate the work that you guys do and you guys looking out for us. Now, as said before, there’s been a lot of good information that has been spoken about here today, and it is my pleasure to now be able to address some of the questions that you have brought to the table. So, with that being said, let’s jump in.

The first question I’ll open up to the entire panel:

59:21
Can an eligible institution apply as a lead applicant, and include a non-profit as a sub recipient?
Thank you, I'll take that. Thank you for the question and we addressed this in the in part in the presentation. But, yes, yes, you can. Again, this is separate from the issue of a consortia application so, again, just make sure you are aware of the rules that pertain specifically to consortia applications, but a lead applicant can include as sub recipients and designate sub recipients in the project. You must pay attention to 2 C.F.R. 200, particularly for the definitions, and then paragraph 3-3-1, or 331, for the determination of sub recipients versus contractors. It is the role of the lead applicant to make those determinations and decisions in the project. So, feel free to reach out to us if you have any additional questions, but please, please refer to that guidance first, as that will have information to address any questions you may have.

All right, and now we will go into another eligible application question. Does a digital literacy program only serve a university, or can a non-profit work with a university to train university students to help develop digital literacy for older adults in the community where the university is located?

Yep, I can take that one again. Yeah. That's a really good question. Yes, You can. Yes. You can do both. You can do community-based programming and support for the university and students. So, again, I don't want to sound like a broken record, but you can read the NOFO, look at the final rule, because the final rule lays out a lot of the, the methodology and thinking on behalf of the pilot program. But, absolutely, yes, you can do both. You're not limited to one or the other. You are confined, though, however, to the Anchor Community Census tracks, all right? Those poverty threshold analyses that we've conducted. Your work in the community is confined in those designated areas. So, again, pay close attention to the rules and the program. And then, if you have any questions - how that relates to your particular proposal - please feel free to reach out to the CMC Project team.

And I just wanted to piggyback on what Scott was saying with that, because it's a really great question. As it pertains to consortia, we all know that a university or anchor institution has to be in the lead position in terms of submitting the application and then working with, you know, a community based non-profit organization. If there are instances of non-profit organizations or MBEs that are in the community and are interested in participating in the CMC grant, we would urge you to reach out to the University in your area. You can go to the CMC Eligibility Dashboard, and on the broadbandUSA.gov website and confirm that that university is eligible to participate. Once you do that, you can reach out to that university and see if perhaps a partnership may be forthcoming in regards to that question exactly in the way that it was framed. The answer is yes and we encourage, you know, participation from non-profits, MBEs as well as universities, although the university must be in the lead position.
Absolutely. Thank you Kevin and I will ask you to continue talking because we do have a question that has come in for you specifically. Would you mind reviewing your slide regarding the unallowables again?

Kevin Hughes
Well with regards to unallowables, and I believe that that information is posted up on our website, there's a whole list of information with regards to items that are allowable and items that are unallowable. You know, I'm not able to recount all off the top of my head exactly, or specifically what the question may be focused on but the information is available there on our website, at broadband USA.gov in the CMC section where it clearly indicates what is allowable and what is not allowable under the CMC Grants.

Cameron Lewis
Absolutely. Fair enough. So, I will now try to swing in, we're going to see if we can get Yongming talking here, so we have a couple of questions for you. First question, should attachments to the SF 424 form be compiled into one PDF prior to uploading, or should individual documents be uploaded on the form?

Yongming Qiu
So, the SF 424 form is a portal form application form. You submit it through the grants.gov portal. And for the other documents that I mentioned in the presentation slide, the addition of required documents, those are the separate documents to be uploaded individually into the form SF 424A, item 15. That's where you upload the additional required documents as separate documents. In terms of the 424, you would submit it through the grants.gov portal. Hope that answered your question.

Cameron Lewis
Absolutely. So, I will ask a question. I will put it up to the entire panel. What kind of IT needs can be covered by this grant?

Scott Woods
I'll take that one again.

Yongming Qiu
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Cameron Lewis
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Scott Woods
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Cameron Lewis
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Scott Woods
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Cameron Lewis
Absolutely. So, I will ask a question. I will put it up to the entire panel. What kind of IT needs can be covered by this grant?

Scott Woods
I'll take that one again.
Alright, so let's come to, Kevin, I think this is a good one for you. A question that has just come in is: Is an eligible institution required to have an MBE or 501(c)(3) as a partner in order to offer services to the Anchor community?

I think there is, yeah, the answer to that is, the anchor institution can reach out to the community on their own. Although, to do that, they would require a partner if they're going outside of their walls. So, the answer is yes to that question and again, I refer to the questionnaire, the person submitting the question, to the NOFO, with regards to specific information with regards to consortia.

Can I elaborate on that just a little bit? Again, it just really depends. Elaborate on Kevin's answer, really depends on the project that's proposed, right? So, the consortia element, excuse me, is there to the extent the university would like to partner with an MBE or a tax exempt a 501(c)(3) organization. I want to emphasize that it's not just a non-profit organization. It has to be a tax exempt 501(c)(3) organization. So again, we look at the NOFO and the rule. There's a simple check you can do on the IRS portal to check that out. But, again, it really depends. So the institution could, on behalf of the students, for example, community college, colleges, could extend their programming for their students into their surrounding anchor communities. Again, it has to be in those designated qualifying Census tracks where their student populations come from or they could also partner in consortia, you know, with an MBE, with a tax exempt 501(c)(3) organization. So again, really look at the rules and then decipher and determine, you know, which particular eligibility case, eligibility criteria, you know, would apply to your, to your situation.

Absolutely. Alright Ming, I hope you’re ready. We have a question for you, okay? So, can indirect costs be charged to equipment?

Thank you for that question. For the SF 424, that form we use as a presentation, as a sample, we did not include equipment in the line. However, equipment may be allowable costs for the CMC Pilot program. So, you need to describe the need of the equipment and how the, you know, it will be used for the implementation of the project, and also you need to include itemization costs and describe the paces, for the estimated cost of the equipment in your budget narrative and also budget template. Describe the, you know, the equipment that is being used for the project.

Absolutely. Alright, so to the entire panel, we have a question, asking: are tribal entities considered MSI’s?

I'll take that. So again, this is all outlined in some of the governing underlying documents. So HBCUs and tribal colleges and universities are legislatively
defined under the Higher Education Act of 1965 so sometimes we get into semantics and nomenclature, you know, regarding minority serving institutions, whether they include HBCUs TCU or not. In this particular example for this particular purpose, HBCUs: Historically Black Colleges and Universities, Tribal Colleges and Universities are legislatively defined. They’re still governed by the database, the NCES database at the Department of Education, but those are legislatively defined. MSIs are, typically are five sub-categories of MSI’s based on minority student enrollment, include, and we outlined this in the previous presentation that we did, as well.

For example, and ANAPISIs, Asian American and Pacific Islander Serving Institutions, Hispanic Serving Institutions, predominantly black institutions, Alaska Native and Native Hawaiian institutions, and Native American serving nontribal institutions generally make up the five categories, the subcategories, of MSI’s for the Department of Education. So, again, it’s based on minority student enrollment and again, the Department of Education maintains that list and that database.

We’re using that information as just a component of the CFC pilot program. In addition to the other eligibility criteria that is contained both in the final rule and the NOFO. So, hopefully that clears it up a little bit.

Absolutely. I feel we’re painting a pretty good picture, here Scott, so I’m sure we’ll be able to come up with everything we need, and they can refer back to the NOFO. So, I will open up to the entire panel. I will ask if an eligible and I will throw in also an ineligible institution has a small business development center that works directly with multiple MBE’s in the designated tracts. Does it need to pick at least one of those MBE’s?

We talked about that earlier. Multiple MBEs can participate in either a single application or multiple applications. You’re not limited by one, and I know there’s some confusion because the way the rule is written in the NOFO is, written. It is written in the singular. It says “an MBE,” but it’s really more than one, so it can contain more than one, and we talked about that in the presentation today as well, so, to make that distinction.

But, but, remember, I just wanted to piggyback on what Scott said. Again, the anchor institution has to be, take lead on the application submission. This is a very, very important point. So, yes, we encourage participation by all, but the college or university has to be the one submitting the application.

And before I guess you go to the next question, can I just, you know, add a little bit back to my answer earlier. I think I didn’t answer fully answered the
question, but you know. I answered that thought that where the equipment is allowable to be on the award. I did not answer that question where, you know, the indirect costs can be charged to the equipment. So let me add a little clarity to that. So, I did say that the equipment is allowable to charge the CMC product programs, you just have to explain that, you know, and justify the cost for the project. In terms of whether or not the cost, you know, can be, you know, can charge indirect cost equipment. It depends on the indirect cost rate agreement that is negotiated and based on the, you know, and the basis for calculating the indirect cost. So, for example, if your indirect cost rate should state the base calculating indirect cost is only for personnel, and the equipment you know has to be excluded right now. And also, for example, if your indirect cost rate has the base, that is a modified total direct cost. So based on the definition of modified total direct costs in 2 C.F.R. 200, the equipment has to exclude it from the base to calculating into you costs. And also capital expenses and other special causes that define in the 2 C.F.R. 200. And also, if you're an applicant that do not have a current negotiated indirect cost rate, you may elect to charge indirect costs using a diminished rate 10%. However, please note that the 10% diminished rate is also based on the modified total direct costs which also exclude the equipment from the base for calculating the indirect costs. So I just want to add that to my answer earlier. Thank you for the time.

Absolutely, and thank you for that addition. So, I will ask this next question that is going along the lines of eligible expenses. Can the following be covered in costs? Telemedicine kiosks and/or equipment, telemedicine services, telemedicine consultations to students and faculty, telemedicine curriculum development for training for students to enter into technology careers, or creating distance learning platforms?

Well, I'll take that question. Again, I encourage you to look at those program purposes and activities and allowable activities and elements that are outlined in the NOFO and answer the question, does my proposal fit in the requirements and in the acceptable allowable activities and programmatic purposes of the CMC Pilot Program? So, again, we're not, we're not leading the witness, if you will, right? We’re allowing, you know, innovative approaches, right? So, you've heard Dr. Alkisswani and the project team. We’ve always talked about encouraging innovative approaches under the CFC pilot program. I want to remind everyone that this is a pilot. We really, at this point, don’t have many hard and fast rules in terms of project activities and innovation.

So, again, I just ask you to look at that program purpose, those program updates, as well as the allowable programmatic activities that we provided as examples and then make the determination: does my proposal or my idea fit into that broad swath of program purpose, as well as those allowable activities? And I think you will answer the question from there.
Cam, I wanted to circle back really quickly on the question that I was asked earlier. The question didn't specify in terms of, specifically, what eligible or ineligible costs they were talking about. There's a whole list of both, as I mentioned, that is available in our prior slide presentation that we did before, as well as in the NOFO. However, with regards to the slides that I presented during this presentation. If the question is pertaining to construction-construction. New construction, based on connectivity, is not allowable under the grant. It wasn't clear what the person was asking for, but I'm going to take a leap of faith and assume that they were referring to construction. And so new construction, for connectivity under the CMC grant is not allowable. You can utilize CMC funds to upgrade existing conduits or wiring or wireless equipment on the campus, but for the purposes of installing new fiber, anything that you will require a permit or turning the dirt, that is not allowable under the CMC grant. So, I just wanted to be clear on that and just raise that point OK, thank you very much.

Scott Woods

And by allowable, he means you can't use federal grant funds, CMC grant funds for that. That would not preclude the institution of higher education, the partner with the service provider, and the service provider or the institution bears that costs out of their own pocket. But CMC grant funds would not be, cannot be used for those ground disturbance, that facility-based construction process. So, just wanted to make that, make that distinction.

Cameron Lewis

I feel that we're finding some very good clarity through a lot of these questions, so thank you to the audience. We are nearing the end of our time that has been allotted for the presentation.

Yongming Qiu

So at this time, I would like to go around the horn, and I want to ask anybody if there's anything you would like to bring to the table.

Cameron Lewis

Absolutely. And before we continue around the horn, I think we did get a question. That was submitted that it would behoove us to take time to speak about. The question that has come up is regarding building out opportunities to connect fiber, or to connect connectivity from building to building at the university. Is that allowable?
Scott Woods

Yes, yes. On campus, you know, any of the on-campus upgrades utilizing existing wiring, existing trenches, existing conduit on campus that are campus-based would indeed be allowed to ask you for that particular example. Contact the program office and let us, discuss that with us and let us walk through, you know, exactly what you propose. But again, any in-building wiring, upgrade wiring, installing AP units, installing transmission equipment on campus, in the dorms, you know, in the buildings, are allowable. But again, for that level of specificity, I would ask that you contact us. Let's walk through that so that you understand exactly where the federal funds can be used or what they can't be used for.

Cameron Lewis

Alright, thank you Scott. Now Kevin, I will come to you, ask for any parting words.

Kevin Hughes

Well, my parting words would be that the CMC grant reflects $268 million that's available for schools across the United States of America to address connectivity, supplies, or IT personnel, the hiring of IT personnel. Those are three tent poles of the grant. This is a great grant and a great opportunity, and the window for the application is open. So, if universities are ready to move forward, they can proceed. If they are ready, they can proceed to grants.gov and begin to fill out that application. Now, if you have questions with regards to the CMC grant, you know, as Scott said earlier, please reach out to us. We're here to serve, we're here to help and we're standing by to assist you with this process. But I don't want anyone on this call or otherwise, to miss this great opportunity for the CMC grant, and I thank you for the time.

Cameron Lewis

Absolutely. Thank you, Kevin. And Scott, I will now come to you.

Scott Woods

Thank you, Cameron! I have really two issues that I want to close with. One is: be on the lookout. We continuously add frequently asked questions to our CMC website that reflects a lot of our interaction and outreach to our stakeholder community. We're planning a round three FAQ update pretty soon in the next couple of days here, so either by the end of the week or by Monday of next week, we'll have a round three of FAQs up. We plan to issue additional FAQs, as needed, as we move forward, and we're rolling out some new information to alert you to updates to the program. So, you'll see, and begin to see some information from the CMC project team, just alerting you to when we're updating FAQs, when we're providing you know, new information, new useful information for you. Stay tuned for that. And then finally, I want to address an issue that I've come across a few times in the outreach that we've conducted. And that is whether the CMC Pilot program can only be used for, only targets, minority students, and minority populations in minority communities. And that is a no. Again, again, we understand what the name is. That's what Congress named this program. But I want to stress to everyone that the minority-serving designation refers to the school status as it relates to the percentage of
students that attend that particular college or universities. And we talked about before HBCU and TCUs are legislatively defined. But all of our institutions of higher education across the HBCUs TCUs, and MSI community serve a broad swath of students from every ethnic and racial group across the country and truly across the globe. So again, it's not targeted exclusively to students of color or communities of color. Again, when you look at this, the criteria of the program, one of the fundamental criteria is the student need. You know, that student need criteria, if you look at that. And that is across the student body. You know, we're not accounting for racial or ethnic groups in that analysis and that information. So, again, the CMC pilot program applies to the needs of your, across your student body in relation to the elements of the program. Don't think that this is, this is just limited to, you know, a particular student demographic, or a particular minority population. It is not. If you have any questions about any of our methodologies, any of the rules, any of the statutory requirements, I would first ask you to read the rule or the NOFO. And then contact us. And then we can, again as Kevin said, and as Ming said will be more than happy to walk you through how this grant can impact, both you as an institution and the anchor community in which you all serve. I want to thank everyone for allowing us the opportunity to be with you today.

Absolutely, thank you, Scott, Kevin, Yongming and to everybody else that we have on the team that has been involved, thank you all as well.

Most importantly, thank you to the audience, we appreciate your attendance, and all of your questions. Anything that you do have, feel free to be able to reach out to us. And to do that, I will refer back to our slides, which will bring you our next webinar.

Our upcoming webinars are on October 20th and October 21st, so please put that on your calendar, save the date, and we will see you there.

Then on the next slide, you will see contact information for the CMC team, so if there are any questions, concerns, any issues regarding applications, please feel free to send an e-mail or you can see the dashboard or the map here on the links at the bottom of the page.

Once again, all of this information will be on the BroadbandUSA website, where you can refer to all of those, the previous webinars we have done, and any other information you will need.

With that being said, thank you all for your time, and we will see you on our next webinar.