

## Connecting Minority Community Pilot Program- Session 8b

**Moderator: Cameron Lewis**  
**November 18, 2021**

Carole Garner

0:30

Hello, and thank you for joining us today. Before we begin, we did want to let you know that due to the format of our webinar, we do regret that phone 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 mobile devices. If you're 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> no later than November 26.

Cameron Lewis

2:18

Hello. Welcome to our final technical assistance webinar series with Connecting Minority Communities Pilot Program. First and foremost, there will be a lot of questions answered throughout this webinar. So, if you have questions, over on the right side of your screen you'll see a Q&A box. Please enter your questions there and we will address them when we get to the Q&A portion of the webinar.

2:42

This presentation along with a transcript and recording, will be available on the broadband USA website under past events, on or before November 26th. So please feel free to check out this webinar, as well as our past webinars as you're preparing for December 1st.

2:59

At this time, I have the pleasure of introducing our team that you will be seeing today. First, we have our CMC Pilot Program Team Lead and our Senior Broadband Program Specialist, Scott Woods.

3:12

We have our Senior Broadband Policy Analyst, Karen Perry. We have our Broadband Program Specialists, which include Michell Morten, Kevin Hughes, and Janice Wilkins. We have our Management and Program Analyst Pandora Beasley-Timpson. We have our Telecommunications Policy Analyst Dr. Francine Alkisswani. Last but not least, from NIST, we have our grant officer, Ming Qiu. There at the bottom you see myself, Cameron Lewis, a broadband program specialist, and I have the honor of being your moderator for today.

3:49

At this time, I have the pleasure of going through our agenda for today's webinar. Starting off, we will have our CMC Webinar recap, brought to you from Karen Perry.

3:58

Then our entire CMC project team, will bring to you our frequently asked questions. Ming Qiu will then come to the front of the screen to give a NIST update. Scott Woods, our team lead, will then bring you our CMC NOFO Amendment. Then we will go to Dr. Francine Alkisswani for Human Subjects Research Guidance and then you will see the entire CMC team for Q&A.

4:26

At this point I would like to invite Karen Perry to front screen to bring you our CMC recap.

Karen Archer Perry

4:37

My name is Karen Perry, and I'd like to give you a recap of the webinars that we have put together from May until now so that you can easily reference them if you need to go back and look at any of those materials as you're preparing your applications. We have provided a number of webinars, and I want to make it easy for you to capture that information.

5:00

We started in May, with a webinar that provided information on the eligibility criteria for our programs. The program opened with information on the Biden Administration's support for broadband, not just in NTIA and the Commerce Department, but really across all the executive branch.

5:20

And then, we looked at stakeholder feedback for this program, kind of a message that has continued, really, throughout this entire program, but we really focused in on how we use publicly available resources to develop the methodology. And those publicly available resources included information at the National Center for Education Statistics, as well as information from the US. Census Bureau.

5:50

We've provided links to all of the resources at the NCES and we also provide links to the research to all of the tables that we were using at the US. Census Bureau. And I provide a demo of how to use the tables at the Census Bureau in order to calculate the eligible tracks that would be at 250% of poverty level or below for the anchor community eligibility. There was really a lot packed into that first webinar.

6:30

Then we came to the June webinar and there was a lot packed into that one as well. That was the webinar where we introduced the final rule, which really codified that eligibility. And in addition to that, we also introduced the CMC Anchor Community Eligibility Dashboard. That's the dashboard that automated all processes that we just showed you before.

6:57

So that made it really easy for you to go to our dashboard and find out which schools were eligible and also see which tracks were eligible. And you didn't

have to do any of those calculations yourself that we have showed you in the previous month.

7:13

We gave you more of an update on stakeholder feedback. And that was also the first session when we gave you a call for merit reviewers and reminded you that volunteer merit reviewers are really an important part of our evaluation process, and that we're counting on you to be part of the whole process as we go through everything.

7:34

In our July webinar, we introduced the entire CMC team, and we also introduced our partners at NIST. This is the National Institute of Standards and Technology, and they also work as our partners in the program. We gave an update on the CMC dashboard, and we also introduced another Broadband USA application or map for you. And it's the Indicators of Broadband Need map. We provided a demonstration of that map.

8:07

It's a map that layers in a number of different broadband datasets, broadband deployment data, broadband adoption data, and broadband use data that you can use to get information on broadband need in your community. And that could be part of your planning process as you're building up your application.

8:32

August was an extremely exciting webinar for us. Our webinar was opened up by our Secretary, Secretary Gina Raimondo, and then from that point on the rest of our speakers, almost all of them used the word "exciting" in their presentations. We were all excited to talk about our NOFO.

8:58

The NOFO was released at that point, and we talked about how excited we all were to introduce it to you and to talk about the eligible entities, the eligible expenses, programming samples, the submission processes, and also to talk about the CMC application review process.

9:18

So, if you want to go back and get a deep dive on the NOFO, August webinar is the one to look at. The September and October webinars were webinars that we dedicated to the FAQs. So, the FAQs were answered in both of them, and we deep dived into a number of different FAQs. We looked at different questions in each one of them.

9:44

In September, we did also highlight the CMC Evaluation and Data Collection processes. And in October, we talked about how you might develop your results framework. Our partners from NIST focused on the application submission process.

10:06

And in October, we talked a little bit about common submission mistakes and how to avoid them. And today we're going to again, dive into FAQs, and also leave much more time to answer more of your questions live. Let's get that started.

Michell Morton

10:35

We received a lot of questions regarding eligibility in several applications that are ineligible based on the grants eligibility requirements. As a reminder, to be eligible for the CMC Pilot Program, the lead applicant must either be an HBCU, TCU, or MSI. Only these three types of educational institutions are eligible to serve as either a single applicant, or the lead applicant of a consortium.

11:03

On this slide, you can see the variation of minority serving institutions, as well as the Website to the CMC Anchor Community Eligibility dashboard for additional guidance on consortia eligibility. We also issued Frequently Asked Questions on eligibility on the CMC website. And we'll go to our next question.

Scott Woods

11:25

Thank you, Michell. And our next question, question number two, deals with consortia eligibility. And throughout our outreach and our meetings with you, this question has come up numerous times.

11:38

Various questions are in various forms, but can be summed up as follows. Can multiple educational institutions collaborate on a project, just serve students, and or builds institutional capacity without forming a consortium? And the answer is, yes.

11:59

Multiple schools can collaborate, as project partners on a project that serves the need of the educational institution. We talked about institutional connectivity and the needs of their students: devices, connectivity access without the need to form a consortium. The lead applicant must be an HBCU, TCU or MSI that's eligible and it can include other schools as subrecipients on the application.

12:30

However, as we have previously noted, there are specific restrictions that apply. Number one, participating schools must conduct programmatic activities only within the qualifying anchor community census tracks. We talked about this before, see section three of the NOFO for additional information regarding the eligibility requirements of the CMC pilot program.

12:57

Number two, any school that's listed as a subrecipient in the application is prohibited from submitting their own application as a lead applicant even if they are an eligible HBCU, TCU or MSI. Again, that prohibition on double dipping.

13:15

And then if you also recall, if you're a subrecipient, and Ming will address this in the grants office recap. A subrecipient is not just a recipient of federal funds. There are other criteria that a subrecipient needs to meet. Most notably that the subrecipient is key in the implementation of the project.

13:37

So, again, going back to the programmatic objectives and implementation of the project, that project has to occur within the 15-mile radius of the lead institution. Again, on campus or in the community, and add in those qualified census tracts. So, remember that.

13:58

Then, number three, any school that is listed as a subrecipient, as we talked about, is also prohibited from being listed as a funded project participant in another CMC application. Again, talking about that double dipping. But I also want to note, we addressed this question several times.

14:18

Please note that the other schools do not need to be eligible as an HBCU, TCU, or MSI to participate as a subrecipient or a vendor or a project partner. However, these schools will be required to adhere to all grant guidelines, rules, and reporting requirements if they are designated as a subrecipient.

14:43

The subrecipient is an educational institution, and the focus of the programming is distance or remote learning. The educational institution may be located outside of the 15-mile radius, but that programmatic activity must be conducted at the lead institution or within the qualifying census tract of the anchor community radius of the lead institution, as I previously discussed.

15:11

In addition, an eligible institution cannot combine the designated anchor community radius of multiple campuses in one application. In other words, another qualifying HBCU TCU, MSI may be within your 15-mile Anchor Community Radius.

15:32

You can't then combine, if you will, the Lead Institutions Anchor Community Radius, and those qualified census tracts, as well as those of that partner institution as well. Whether it really lies in your 15-mile radius or outside of your 15-mile radius. Again, we've dealt with this question a number of times, so please, you have any questions, please address them at the end of today's webinar or you may follow up with a member of the program team for consultation.

16:07

Sticking with the theme of consortia eligibility, the question is then, when would a CMC applicant apply as a consortium? And the question is as follows.

16:19

If an eligible applicant seeks to collaborate with the Minority Business Enterprise, or a tax exempt 501(c)(3), to propose a project that serves the needs of the surrounding community, the applicant could apply as a consortium subject to the following requirements.

16:38

Again, sticking with those three basic requirements of eligibility. Number one, the Consortium must be led by an eligible HBCU, TCU, or MSI Higher Education Institution.

16:53

Michell talked about that in question number one. Even if you are involving minority business enterprise or a tax-exempt 501(c)(3) organizations, they cannot serve as the lead applicant. Lead applicant must be that eligible HBCU, TCU or MSI. The Consortium must include at least one MBE, or tax-exempt 501(c)(3) organization.

17:19

We released FAQs, and we've talked about this in our previous content that it can contain multiple MBE's or multiple tax-exempt 501(c)(3) organizations as well.

17:31

And, again, finally, just with the consortia. An eligible consortium must conduct the community-focused program activities within the qualifying census tracts of the 15-mile radius of that eligible lead institution. Right, so, again, we talked about the program methodology for anchor community radius.

17:52

If you want more information on that, see section three of the NOFO for the eligibility requirements as well as information on how we went about adjusting qualify those census tracts in the anchor community zones of each school?

18:11

Again, please note that this particular example focuses on a community example. Consortia could also be formed to conduct student and/or institutional-based program activities at the lead institution.

18:25

And, again, the above example that we've talked about focuses on a community-based project for consortia eligibility.

18:35

So our next question, again, we've received a lot of questions on consortia. The question is, can an eligible HBCU, TCU, or MSI propose its own project focused on student and institutional needs and lead a consortium project that proposes programming within the surrounding community and do all this in the same application?

19:01

Answer is yes. Since the eligible HBCU, TCU, or MSI can only submit one application per institution, the eligible school can serve both as a lead applicant

on its own project on campus or for students. And as the lead of a consortia community-based project, it would be three program components, but one single CMC application. We hope this clears that and addresses that issue.

19:32

Let's move on to the next question.

19:34

So our next question deals with greatest unmet financial need and the data that schools will have to submit with their application. And the question is, what should the applicant do if they don't have all of the data that the CMC NOFO requests?

19:51

Specifically, the low-income consumer data, and the student unemployment data, as referenced in numbers 4 through 6 below.

20:00

So, again, as we've talked about, in our previous webinar content and in our outreach, we understand that schools have and do report on criteria in 1 through 3.

20:12

As we see here, student population size, the number and percentage of students that are eligible to receive Federal Pell Grants, and then the number of students that receive other need-based financial aid from the federal government, from the state, or from that institution of higher education.

20:30

Schools report on this data to the Department of Education on a yearly basis. So, every school should have this information items number 1 through 3. Again, we understand that items number four or five and six aren't readily available, and we've acknowledged that in the NOFO, particularly for the low-income, consumer, and the unemployment student data.

20:54

Therefore, applicants are encouraged to submit supplemental data and any information to include demographic, income, and employment data that illustrates this unmet financial need of their students or their target surrounding communities or program beneficiaries.

21:12

So, again, we understand 1 through 3 schools, you-all report this data on the IPEDS to the Department of Education, that's clear. Four through six, if you have it, please submit it, you will not be penalized for not submitting data. Responsive, 2, 4, 5, and six, I want to repeat that again. You will not be penalized for not having this data, again, referred to the NOFO. We have a footnote on that.

21:42

We understand this information is not readily available. All right, so please let us know if you have any questions on that.

21:52

So, our next question, speaking about data, we're talking about the anchor community census tract data, particularly for US Territories and the question is, our school is located in a US Territory. How do we determine which census tracts are considered eligible anchor communities under the CMC Pilot Program since current US census data is not available here?

22:20

Now, we have some really good developments on this front. As we stated previously in our previous content, we understood that the American Community Survey data only cover the United States, contiguous US States, the District of Columbia and Puerto Rico, but it did not cover Guam, the Commonwealth of the Northern Mariana Islands, and the US. Virgin Islands. It did not have updated Census data for those territories. We will accept 2010 census data for those anchor community eligibility calculations for those US Territories, right? So, American Samoa, Guam, the Commonwealth of the Northern Mariana Islands, and the US. Virgin Islands have 2010 census data.

23:13

For your census tracts, we will accept that median household income, median household size.

23:21

Now, you can refer to the methodology for determining Anchor Community eligibility. We've done a webinar on it on May 5th.

23:29

We'll also have a link in here to that particular webinar content. You can also get that information on our CMC Final Rule, the methodology, and we've also put a direct link here to those Census data tables.

23:45

From the Census Bureau, the 2010 census data on median household income and average household size, territories, are available in tables HCT 11 and HBG on the US Census Bureau website.

24:04

And we've got a link to that on here, and we'll put that out for you as well, so you can access that data.

24:13

Again, as a reminder, information about the CMC, Anchor Community Eligibility, is available in the CMC Final Rule, right? And talk about the methodology and why and how we calculate anchor community eligibility.

24:28

We also do that in the CMC NOFO, and you can find that information in the About tab on the CMC Anchor Community Eligibility Dashboard, AKA the CMC Dashboard. So, for the territories that are represented, that we've talked with, again, we've come up with a solution for you to ensure that you can be included



100% in the CMC pilot program. And now, I will turn it over to Kevin Hughes. We'll talk about the duplication of federal funds, Kevin, over to you.

Kevin Hughes

25:08

So our next most frequently asked question relates to duplication of federal funds. The question is, can an eligible institution use CMC pilot funds together with federal funding from another agency to support different aspects and activities of a multi-faceted program? For example, the training costs associated with previously funded devices and equipment. The answer is yes.

25:37

An applicant may propose to combine different sources of federal funding together to support different aspects and activities of a multi-faceted program. However, each federal grant program must separately approve the costs related to the program, and the grantee must document how the split was determined in accordance with direct cost allocation principles.

26:00

The amount charged through federal award must reflect only the proportional benefit for that funding source, and when combined with other sources of funding, the funding cannot exceed 100% of the total cost of the program.

26:14

The recipient must document and ensure costs meet the requirement in 2 CFR 200.405 regarding allocable costs.

26:26

And now I'll turn it over to my colleague, Michell Morton, who will address our next question, Michell over to you.

Michell Morton

26:38

We've received many questions regarding using CMC funding for work-based training and educational programs, such as apprenticeships and internships. The CMC funding can be used for work-based programs like apprenticeships and internships.

26:52

We know that apprenticeships and internships can serve as a critical conduit between college and a job post-graduation and response for more funded appeals, apprenticeships and internship opportunities. Allowable costs include stipends, equipment, and training.

27:08

Some examples of an apprenticeship or internship program can include university partnering with an MBE or other private partners to place students into IT apprenticeship programs for underrepresented or underserved students.

27:24

A college will also use CMC funding to provide stipends to students to serve as digital navigators on or off campus and in anchor community. The digital navigators could provide tech assistance and IT support, offer tech training, or

conduct community outreach engagement. Please make sure to review all eligible and ineligible costs in Section J of the NOFO.

27:49

Initial costs are in accordance with the cost principle and 2 CFR Part 200. And we'll go back to Kevin for our next question.

Kevin Hughes

28:01

Thanks, Michell. And our next most frequently asked question revolves around the extension of the period of performance for the CMC grants. The CMC Program has a duration of two years, however we expect to continue our data collection, program analysis, and evaluation beyond this time period. So, the question is, can CMC funding be used to cover the costs of activities beyond the initial two-year period of performance of the grant?

28:30

And the answer is yes.

28:32

Well, NTIA has set the initial award period as no more than two years from the recipient of grant funds. NTIA, however, may extend the initial award period if the eligible recipient, certifies that one, it has a plan for the use of the grant funds, two, the execution or implementation of the project is underway or three, extenuating circumstances require an extension of time to allow the project to be completed.

29:03

See Extension Requests in Section 2.B.1 of the CMC NOFO for more details. And now, I'll turn it over to my colleague, Janice Wilkens for another frequently asked question. Over to you, Janice.

Janice Wilkins

29:22

Thanks, Kevin.

29:23

Next, frequently asked question: Does the COVID vaccination requirement, as stated in Executive Order 14042, ensuring adequate, COVID safety protocols for federal contractors, apply to CMC grant recipients and their partners, including sub-recipients, consortium members, and/or subcontractors?

29:48

The answer is no.

29:50

CMC grant recipients are not subject to the Federal Government COVID vaccination requirements. Per the CMC NOFO, the funding instrument, is a grant award in Section 5(B)(I), of that same executive order expressly provides that federal grants are not subject to those requirements.

Ming Qiu

30:14

Now I will turn it over to Ming, a grant officer with NIST. Now I will turn it over to Ming Qiu, a grant officer with NIST, who will now provide a grants office recap.

30:29

There was great material from the CMC program team. Now let's cover some grants information.

30:35

I am Yongming Qiu with the NIST grants office. I will run through some of the top budget related questions we see.

30:42

But first all grants, recap off the past webinars. We want to remind you of the material we covered in the past months. Recordings and slides for these presentations are available on the past events page, on the Broadband USA webpage.

31:00

In July, we introduced the NIST grants office. We are partnering with NTIA to administer and manage the CMC pilot program. We introduced and demonstrated requirements and financial management standards which apply to this program. Finally, we describe the general principles for cost allowability.

In August we presented on the application submission process.

31:26

We walked through the main steps needed to start your application. These include a setup of sam.gov and grants.gov. We've walked through the application components, forms, and additional required documents needed for a complete application package. We covered the SF 424 application form, and the SF 424a budget form. Finally, we cover the budget components of the application.

31:55

In September, we did a deep dive of the budget. We walked through each cost category in the SF 424a and shared the type of information needed to provide a clear budget.

32:06

We reviewed important pre application activities, such as working on the application system registrations and becoming familiar with the NOFO. We walked through the SF 424 application form page by page.

32:21

Finally, in October, we addressed specific items of cost including: indirect costs, supplies, and equipment, and subrecipients.

32:30

Please review the past webinars for more detail on these topics. Alright, moving on to our FAQs.

32:39

Question one: What level of detail is required for the project budget and budget narrative? For the budget, we focus on three components. Think about this as a progression that starts with a high level view of the budget with the SF 424a form for non-construction programs, then move to the budget spreadsheet.

33:00

And, finally, the budget narrative, There isn't a template for these budget documents, But there are some NOFO guidelines for the necessary content.

33:10

In the next slides, we will share the recommended level of detail for the project spreadsheet and the budget narrative.

33:18

In the project budget, provide a detail and itemized cost breakdown for all project costs. Format the detailed project budget as a spreadsheet. Spreadsheet must be formulated to fit letter size paper 8.5 by 11.

33:35

The budget narrative must provide a justification for the basis of each proposed cost in the budget and must be concrete and specific. Mirror the SF 424a cost categories, and the information from the spreadsheet to offer an actual level of clarity.

33:52

A final note for the budget, as noted in the NOFO, the CMC Pilot program does not have a cost sharing or matching funds requirements. However, applicants may propose to contribute a binding voluntarily, committed non-federal cost share amount.

34:08

Make sure to complete Section C of the SF 424a form if you proposed a non-zero cost share and incorporate any necessary detail into the project budget and budget narrative.

34:20

Question two, are the items listed as electrical equipment in the NOFO considered equipment for the cost qualification purposes? Well, it depends. These items may be considered equipment or supplies. An item is considered equipment if it's an item having a useful life of more than one year and per unit acquisition cost which equals or exceeds \$5000 or a lower capitalization level established by the non-federal entity.

34:53

An item is considered supplies if it is not covered in the definition of equipment. It is an item with a per-unit acquisition cost which is less than \$5000 or a lower capitalization level established by the non-federal entity. If you include equipment or supplies, review these definitions and your organization's policy to correctly classify these costs.

35:19

Question three: What is the difference between a subrecipient and a contractor?

35:26

So, the key difference is the scope of work and compliance requirements. The 2 CFR 200 331 covers subrecipient and contractor determination. A sub-award is for the purpose of carrying out a portion of a federal award and creates a federal assistance relationship with the subrecipients.

35:47

Characteristics which support the classification of the non-federal entity as a subrecipient include when the non-federal entity determined to be eligible to receive federal assistance has, its performance measured in relation to

36:04

whether objectives of a federal program were met, has responsibility for the programmatic decision making. It is responsible for adherence to applicable federal program requirements, specify in the federal award and in accordance with its agreement, use of Federal funds to carry out a program for a public purpose specify in authorizing statute, as opposed to provide goods or services for the benefit of the pass-through entity.

36:37

A contract is for the purpose of obtaining goods and services for the non-federal entities own use and creates a procurement relationship with the contractor.

36:51

Characteristics indicative of a procurement relationship between the non-federal entity and the contractor are when the contractor provides goods and services within normal business operations.

37:04

Provides similar goods or services to many different purchasers.

37:08

Normally operates in a competitive environment.

37:12

Provides goods or services that are ancillary to the operation of the federal program and is not subject to compliance requirements of the federal program as a result of the agreement though similar requirements may apply for other reasons.

37:30

Remember, in determining whether an agreement between a pass-through entity and another non-federal entity the latter as a subrecipient or the contractor, the substance of the relationship is more important than the form of the agreement.

37:47

Our last question, Question four: How are attachments included in the application package?

37:55

These steps, while attaching required documents, is easy to miss.

37:59

The instructions are provided in Section 4 D of the NOFO. The required application components are listed in Section 4 B of the NOFO.

38:08

Additional requirements that will be attached to your application include the project narrative, the detailed project budget and budget narrative, justification regarding compliance, the indirect cost rate agreement, letters of commitment, and, finally, the certification for minority business enterprises, if applicable.

38:29

These attachments you prepare, you will have to add to your application package. You will do this through the SF 424 form, specifically in line item 15 of this form.

38:40

There is an Add attachments button. This will create a zip file that allows the transmittal of the document electronically via grants.gov.

38:52

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

39:02

That's all I have for you today. Thank you for your time, feel free to contact me if you have any grants management questions as you prepare your application.

Scott Woods

39:14

Thank you, Ming, and good afternoon again, everyone.

39:16

It's my pleasure to be with you again to talk about the recent CMC NOFO amendment that posted on the grants.gov site on November 9th.

39:28

And I'll be brief, this NOFO amendment addresses the initial review process that the Program Office will undertake during the application review process. This is covered in section 5B1 of the NOFO regarding the initial administrative and eligibility review of complete application packets or submissions.

39:53

The modification, the amendment, addresses a process to include our requests for missing or incomplete information.

40:03

And the details of that amendment is here. I'm not going to read it in its entirety, but essentially it gives the program office during our initial review of your application, the ability to request missing or certain information, documentation that is otherwise required by the NOFO but was not submitted or is missing from the application.

40:26

Applicants will have seven days to submit that missing or incomplete information, or their application will be rejected. Any application that had already been submitted at the time of this amendment, will receive the same opportunity to submit any missing or incomplete documentation or materials as all other applications.

40:51

So, again, just want to sum it up.

40:54

The initial NOFO did not contemplate a curing process for applicants. What we've allowed here is seven days.

41:08

I want to say that's seven days for missing information or certain documentation that was not submitted within with your application.

41:19

This does not give you license to submit as a placeholder an incomplete application with the idea that you will have seven days during this process to come back to it and to complete it. That is not what this is.

41:34

So again, if you have any questions about this, please feel free to reach out to me directly or a member of the CMC team, and we can go through the details of this. But essentially, this is flagging for fundamental fairness and equity purposes, the opportunity for applicants to submit missing or incomplete information, instead of having your application initially rejected by the CMC Program office. So you do have an opportunity here to address missing or incomplete information. If this applies to you, you will get details from the program office as appropriate.

42:44

Cameron Lewis

Alright, ladies and gentlemen, thank you so much for your patience through our presentation. Now at this time, we can move to Q&A.

41:39

All right, ladies and gentlemen, thank you so much for your patience. We hope that presentation thus far has answered a lot of the questions you may have, but there are a bunch of questions that are coming in the chat box. If you do have more questions, please feel free to enter them into the chat box, and we will address them if there's time, obviously.

41:58

But the first thing I would like to say before we jump into Q&A is our Human Subjects Research Guidance is now posted on the CMC website. And any questions or concerns regarding that can be directed towards Dr. Francine Alkisswani. All right now with that being said, let's jump into some of the great questions that you guys have.

42:19

And Scott, we're going to come your way first.

42:21

Alright, so the first question we have is can you speak to the award percentages for non HBCU MSIs? Is it limited to 20% of the total pool, or may additional funds go to competitive MSIs?

Scott Woods

42:39

Thank you for that question. Yeah. Very good question.

42:42

So as the commenter, I think, noted in the CMC final rule, that Congress did allocate 40% of the CMC grant funds to go to HBCUs. And that means the remaining 60% is spread out competitively amongst all of the remaining institutions, regardless of entity type. So, yes. It is not limited to 20%.

43:09

It would be open – again, the criteria greatest unmet financial need, right? The other programmatic components that we will be reviewing would all go into that final determination, but it will not be bucketed by school type as the commenter, as the question posed.

Cameron Lewis

43:28

Alright, thank you so much, Scott. Now, Emy, we're going to bring you the front screen to answer this next question for us. The question is: how much do we discuss eligible census tracts if we are not applying as a consortium, and must intern placements be in eligible census tracts?

Emy Tseng

43:50

Okay.

43:51

Well, again, eligible census tracts really applies to community-based programs, so if you are doing a program that serves your own students, your own enrolled students, or build the capacity of your institution, again, that the whole requirements about eligible census tracts do not apply. In terms of the internships, again, it comes down to intent.

44:18

So, if you have an internship program, for example, with a tech company, or such where the internship – the whole intent of the internship is to provide work-based learning opportunities for your students, then that does not have the kind of geographic requirements. However, if your interns are really focused on community-based programs, i.e. the interns are providing tech support or training or such to the surrounding communities, then those activities – actually then that becomes a community-focused program, and those activities must occur within the eligible census tracts.

45:04

Cameron Lewis

All right, thank you so much, Emy.



45:08

Now, we have a question that's regarding the project budget spreadsheet. So, Ming, I'm going to ask you to answer this for us. Could you please review the parts of the budget that are needed, especially the detailed project budget spreadsheet? Is there a template that's available?

45:25

And also, there seems to be parts of the budgets on grants.gov for the SF-424A Form, the detailed project budget spreadsheet, and the budget justification.

45:42

Is that correct?

45:45

Ming Qiu

So, thank you for the question.

45:59

Thank you for the question. I think, you know, as I just presented the material in the presentation earlier, we kind of talked about detail in that. So, the short answer to that question is, yes, in the budget there are three components.

46:14

The three separate components or documents are: the SF 424-A form for non-construction programs, and then the budget spreadsheet, and the budget narrative. For the budget question and budget narrative, there's not a template specifically for those budget documents, but there are some NOFO guidelines that, you know, for the necessary contents and details is to be provided as part of the budget justification, and also as part of the budget narrative.

46:43

I'm going to refer you back to the presentation to see more on [those] documents. It will be posted – also on the previous webinar, we also went through that in the previous webinar as well, too. Thank you.

47:00

Cameron Lewis

Absolutely, thank you, Ming.

Janice Wilkins

Cameron, and this is Janice, can I add to what Ming just said?

47:05

I put a link in the answer box, and hopefully the link will help applicants with those three items. They're examples.

47:22

Cameron Lewis

All right, thank you so much, Janice. As you guys know, checking the chat box, you'll be able to get to those links. All right, so this next question we're going to come to Scott. The question is, and we're going to try to see if we can get this all out with one breath: we will prioritize low-income students and others who meet the statutory requirements. Are we able to serve additional students with demonstrated needs for devices beyond those criteria? Or once those are identified and served?

47:59

Scott Woods

You know, you have to look to the statutory purpose of the program. It is for your students in need, or your low-income designated students. We understand that many of the institutions, you have these numbers, or can calculate, you know, your total number of students “in need” or that fit the need criteria. It's, again, it's not just based on numbers. It's also based on students that you believe that need or don't have access. So, again, we're leaving this into your best judgement, as you know your student body, your student population better than we do.

48:37

We just ask that for the purpose of the program, you are targeting students in need and the students who otherwise would not have access to the equipment into the program.

48:55

Cameron Lewis

Michell, we're coming your way. You ready? OK, so, would the project be eligible if the primary focus is providing digital skills trainings to the students of the MSI partner and the clients of the community-based non-profit, supported by providing them tech support and broadband devices?

49:21

Or (second breath) does there need to be more technical IT training, other equipment purchasing as the focus?

49:32

Michell Morton

The answer is yes. The project would be eligible. I got all that. Yes. It would be eligible. So, no, the project would not have to be more technical.

49:46

Cameron Lewis

Alright. So let's see if we can get Kevin in the game here. We have a question for you. The question is: my college is a PBI. We are partnering with both MBEs and non-profits. Would it be better for us to apply as a consortium? Or does it matter?

50:06

Kevin Hughes

Thanks for the question, Cameron.

50:08

In this instance, based on the question as it was posed, the answer would be it would be better for them to apply as a consortium.

50:20

Cameron Lewis

Alright. Now, Emy, let's ask you a question. This question should be quick.

50:28

The differences between a consortium and a subrecipient – can you explain?

Emy Tseng

Ironic statement, right? Alright. I may need help, particularly from Ming. But I think a lot of the confusion surrounding the different – how you classify the different types of entities and the different types of partnerships or collaborations per se, comes from the fact that the legislation uses language around consortia. But then there is actual language that is required by the actual federal grant rules. So basically, but maybe I'll let Ming talk about the definition from a grant rule perspective, and then I'll give the program office perspective. The difference of what is a subrecipient. Yeah.

Ming Qiu

51:31

Thank you, Emy. So Emy kind of answered most of the question already. The terminology in grants management, normally, either of you considering that, you know, the partnership as a subrecipient, a subawardee, or a contractor, that's the grants term. So, you know, the difference between a subcontractor and the subawardee, the key difference is the scope of work and a compliance requirement that's attached to the subrecipient. Whereas the contractor, the compliance requirement – the grant terms and conditions does not flow down to the subcontractor. Whereas the subrecipient [or] subawardee, the grant terms and requirements flows down. And, you know, for the purpose of that is to carry out the federal award and create assistance relationship with the subrecipient.

52:31

And as I went through the presentation for the contractor – a contract is for the purpose of obtaining good and services that are for the non-federal entities' own use, and that creates a procurement relationship with the contractor. So, you know, for the subrecipients, they have some programmatic decision making, and they have some performance measure in relations to the project, programmatic objectives are met.

53:03

Whereas the contractor, you know, they just simply provide the goods and services, accessory to the program, not, you know, the requirements and not flow down to the subcontractor. So that's the answer to the question.

Emy Tseng

53:18

OK, great, and that answers the question, in terms of the grant office then. And in terms of the program, because the legislation had statutory requirements around consortia, particularly in any kind of programmatic activities, or project happening in so-called anchor communities, there is the requirement that if a project is to conduct activities in the anchor communities, that they form a consortia with where the lead applicant is an eligible HBCU, TCU, or minority serving institution. And that they must then also collaborate in the consortia with either an MBE or a non-profit. And again, this is actually from statutory requirement, particularly for activities that happen in anchor communities.

54:24

But, just to add, if you are doing a project that is solely focused on student needs and/or building your own capacity, i.e. educational purposes within your own institution, you are not required to form a consortia.

54:44

But you will need, if you do partner with either other institutions, or have contractors, or work with other organizations, you will need to define the subrecipients, and contractors for the grants office. But you do not need to form a consortia. I hope that clarifies it.

Scott Woods

55:14

That's a good 20 minute answer.

55:19

If it wasn't by the textbook, it seems it was tennis. Emy to Ming, Ming back – so we're going to come back to Ming as well. A question for you Ming is what will the start date for funding applicants be?

Ming Qiu

55:37

That's a great question. So in your application, in the NOFO, basically this program, the initial funding for this program is for a two-year period performance. Now, in your application, you can propose an award start date.

55:51

However, the official start date will be determined on the award agreement, where the CD-450, which is the cover page of the agreement, will specify the period of performance and the official start date. So they are – the proposed date in the application is the proposed date, but, you know, the award agreement will decide what the official start date would be.

Cameron Lewis

56:18

Alright. Thank you so much Ming. Let's see if we can get you a question in here. Scott. The question for you is: does a consortium have to be a pre-existing formal entity, or can it be created for the purpose of this program? And is there a minimum number of partners?

56:41

Scott Woods

Thank you. Yes, there is no minimum number of partners, but for the purpose of a consortia application, it would have to be an existing entity because of the self-certification form in the IRS portal check for the tax-exempt 501(c)(3) organization, so it can't be post-created. It has to be confirmed during the initial review process internally after the applicant submits the application.

57:10

If you look into the NOFO there is an MBE certification self-certification form. Alright? So, obviously, it has to be in existence to self-certify that form as well as I just mentioned, the tax-exempt organization check through the IRS portal. So, as a result of those two, it does have to be an entity that's pre-existing. It cannot be created post-application.

57:39

Cameron Lewis

OK, thank you so much, Scott. Um, let's see if we can get this to Emy. OK, so it starts off with a statement: it says thank you – I assuming that's to all of us – for this presentation. The rest of the question is, does the eligible activities, I

assume, does the activities need to be student facing initiatives? And they're discussing IT careers in the community.

58:11

Emy Tseng

So, you can engage community members in your initiatives and your projects. However, again, the community, if the program participants are really members of your community and not enrolled students, then that is a community-based project. And then you would have to basically follow all the requirements for a consortia, which again needs an MBE or a non-profit to participate as well, as you need to basically conduct any of your activities, i.e. some training activities within the eligible census tracts.

58:57

Cameron Lewis

Thank you so much, Emy. We're going to get you a question here, Ming. This is regarding Section 4.B.6.c of the NOFO.

59:07

It says to include information in any supplementary info to explain the data. Should the data be included in the narrative itself? Or as an appendix?

59:23

Scott Woods

I'll take that one. So, again, it's really up to you how you want to present that data. Just do it in the section that it's provided in.

59:33

And so you can see attachment for supplemental data, you know, that further explains the student need criteria requirement, or you can, you know, factor that into your narrative response, but either way I just encourage everyone to make sure you read through the NOFO and address all of the requirements.

59:53

Then, we can get into the technical details of whether you do that through an attachment, through the SF-424, or you can do that in the narrative. Again, we have detailed instructions on how to attach documents, how to submit in detail instructions step by step in filling out the 424A for the pilot program.

1:00:21

Cameron Lewis

Absolutely. OK, thank you, Scott. So Ming, let's see if this one gets to you. We're going to try this again. OK, the question for you is: are single applicants required to have letters of support from subrecipients?

Ming Qiu

So there's certain answer to that question is, the letter of support are not required from the subrecipients. However, you know, in the NOFO specifies that for each of the consortium, applications must include a letter of commitment from the authorized representative of each.

1:00:53

So, the letter has a commitment, will be, you know, discuss the scope that to be conducted by the member of the consortium and their relevance to the proposed project. So, the answer to that question is no, letters of support is not required from the subrecipient. Letters of commitment are required for consortium applications.

1:01:14  
Scott Woods If I can also add on that, that for subrecipients of that single applicant, it still would need to be listed in the table of funded collaborators, so you still would have to list that. All of those entities that receive funding, you would have to list those in that table.

1:01:34  
Ming Qiu Thank you for adding that, Scott.

1:01:37  
Cameron Lewis Alright. So, Scott, let's keep talking here. Let's see if you can get this one for me. Are broadband need baselines assessed during pre-application stage?

1:01:50  
Scott Woods I have no idea what that question is, so they'd have to contact us for more information.

1:01:55  
OK.

1:01:58  
Cameron Lewis Alright, so, um, let's see, what do we have here? There are a lot of questions coming in, so let's see if we can get this question to Emy. From the CMC dashboard it looks like [for] public universities, main campus and a satellite campus are separate entities. Would we apply as a consortium?

1:02:28  
Emy Tseng Again, this goes back to the intent. So, basically, if you have a program that addresses the needs of your students, you can apply – addresses the needs of your students or builds your own educational capacity. You can apply as an eligible institution with a subrecipient.

1:02:56  
So basically, again, if your intent is just to serve your students, then basically there's no need to apply as a consortia, but you can apply together as a prime recipient and a subrecipient according to the grant rules. It's just that the lead applicant needs to be an eligible HBCU, TCU, or MSI.

1:03:28  
If what you're proposing is to do a community-based project, then it gets a bit more complicated. Basically, geographical constraints would apply it to the lead applicant. And also, then you would then have a collaborator that was an MBE or a 501(c)(3), and again, the 15-mile radius only gets drawn around the lead applicant's campus.

1:04:04  
So again, if what you're proposing to do work together to serve your own students, then basically, it's a prime recipient, subrecipient relationship.

1:04:21  
Cameron Lewis

Alright, Ming I would like to ask you a question. If pre award is covered by the 501(c)(3), are any members of the consortium eligible for grant funding reimbursement, if awarded?

1:04:39

Ming Qiu

It's a little technical question there.

1:04:43

Can you repeat that again? I'm sorry.

1:04:47

Cameron Lewis

If pre award is covered by the 501(c)(3), are any members of the consortia eligible for grant funding reimbursement for that use, if awarded?

1:04:59

Scott Woods

Let me jump in here for that particular example. I would ask that they contact the program office. There are nuances in there that we couldn't quite cover in this particular format. So please make an appointment or consultation with the CMC team or the grants officer will get that question answered for you.

1:05:23

Cameron Lewis

Alright, so let's move on to this next question. The next question is: can the NTIA federal staff provide examples of anticipated non-construction equipment, upgrades, or enhancements to the broadband and IT capacity eligible HBCUs and others?

1:05:51

Scott Woods

I can take that.

1:05:52

I mean, normally we don't provide that. We can't provide that direct advice, but normally, you know, your CIO or your IT staff, or if you don't have that, you know, a vendor would be able to provide an analysis of your current situation, and then would be able to project with the equipment and prices and performance the specifications that would be required to upgrade your campus connectivity and all of those things. So that's generally something that the burden is on the recipient to do that. You have to refrain from the program office from providing any recommendations or information.

1:06:37

Cameron Lewis

Alright, so his next question I will ask Emy. This question starts off regarding the priorities that are posted on pages 6 and 7 at the NOFO. They're asking: can a federal staff offer some guidance on how to avoid over repetitiveness in responding to all eight priorities?

1:07:02

Emy Tseng

I just wanted to clarify that you do not have to fulfill all eight priorities in your proposed project. So, really, that's just, that's more of a laundry list of the types of programs that you can propose. You don't have to do all of them in a single application, or a single project.

1:07:22

Basically, it's really up to you to best describe the best that you can how your proposed project fulfills or carries out the intent of at least one of these project priorities. So you do not have to, you know, have the one mega project that fulfills all of the suggested priorities of the program.

1:07:55

Scott Woods

Just follow up with that, because it does say in the NOFO that the prospective applicant or program must fulfill at least one of the following eight. So, it's not all eight, it's at least one.

1:08:10

Cameron Lewis

Alright, now, Scott, I'm going to ask you this question. For the data portion, i.e. students and financial aid, should it be just this semester, or do we need longitudinal data?

1:08:25

Scott Woods

Generally, it's your last uploaded iPASS report to the Department of Education, regarding your student need, your Pell Grants, students on financial aid, and so that's what you would use. Not necessarily longitudinal data over the course of years.

1:08:43

It's just your latest academic year report, then that standard across all institutions – you all have to upload the same report, the same information at the same time or the same time period, you know, that's the data that you would utilize [and] upload for that student portion data.

1:09:07

Cameron Lewis

Alright, Emy, I'll ask this question. Is there a barometer on how many additional CMC Pilot Program IT support staff, is reasonable for a campus with 2,000 or less in enrollment?

1:09:23

Emy Tseng

Just to go back to what Scott has just said, that's really up to your own analysis, your own IT department. And also, I'm guessing that, you know, sometimes the federal programs have restrictions on the number of personnel they are allowed to hire or the type of personnel. But, really, in this case, it's up to you to analyze your own IT staffing needs, decide whether they're actual full-time personnel or halftime or consulting staff that you need. And then propose that to us and make the case that that will carry out the purposes of your project. So really, it's up to you to basically determine the level of staffing that you need.

1:10:17

Cameron Lewis

Alright, thank you, Emy. Scott, I have a question for you. This question says, my institution is recognized as an MSI, or an AANAPISI. Does this mean that any awarded funds need to be allocated only for AANAPISI initiatives?



Scott Woods

1:10:37

Yes, another good question. We've addressed this in our FAQs, as well. No, no, it's not – your programming is not limited or should be focused on ethnicity type of your students. Again, it is based on student need of your entire student body.

1:10:53

Again, the MSI designation, the HBCU, the TCU designations for HBCUs and TCUs, those are legislatively defined. The MSI, we use information provided by the Department of Education, but it all goes to the percentage of students who attend your university, so certain designation that is based on student percentages.

1:11:15

CMC programming does not have to be nor should it be targeted just to, only to your minority students or students of color at your institution. It's just based on student need across all demographics, all racial structures, all of that.

1:11:32

So, again, the MSI designation is only about the designation of the school based on student population, but not for targeted program.

1:11:44

Cameron Lewis

Alright, Thank you, Scott. Ming, I have a question for you. The question is: what will be the reporting mechanisms? Is it quarterly, monthly, or annually?

1:11:56

Ming Qiu

That's a great question. So, the NOFO has a section regarding reporting and lays out all the details of the reporting requirements. There is a semi-annual reporting requirement, and there's also an annual requirement.

1:12:11

So, semi-annual the report must be submitted by the reporting period ending in March and September. The financial report is the anniversary, the one year from the [start of] funding. There is a semi-annual reporting requirement, and an annual reporting requirement.

1:12:

And, also, if the application is selected for funding, there will be a specific award condition, also, incorporated into the award that lets you know exact time you need to submit the application – I mean, your reports, and how to submit them.

1:12:44

Cameron Lewis

Absolutely. Thank you so much Ming. So, my next question is for Kevin. Where are the questions? Here we go. Can consortium members be added to the project after the award?

1:13:08

Kevin Hughes

OK, thank you for the question.

1:13:12

If you're saying if they can be added after, I believe that they would have to be designated beforehand.

1:13:23

Scott or Emy, if you guys wanted to just join in on that, you're talking about after the award has been given.

1:13:33

Michell Morton

I can take the question, actually. OK, so typically not, but it really depends. If a consortium number drops or becomes insolvent, then you would have to seek a project modification from the grants office and would have to be approved.

1:13:55

Kevin Hughes

Right, typically not, but thank you. Thank you, Michell.

1:14:02

Ming Qiu

Just to add to that, Michell kind of described the process for amending or changing a scope of work. So, typically, you know, when you're adding something to the consortium, you are most likely will change the scope of work and change the budget sometimes.

1:14:18

So, those are the prior approval requirements and must be submitted for prior approval before you can do any modification to the scope by adding additional consortium members to the project.

1:14:36

Cameron Lewis

Alright. Ming, I'm going to throw one more question before we go around the horn to see if we have any closing remarks. The question is: how do we document the costs and prepare the application for reimbursement for the up to \$50,000 to prepare the application?

1:14:54

Ming Qiu

Is this regarding the \$50,000 pre-application expenses?

1:14:59

Cameron Lewis

Yes, they're talking about the pre-application expenses and how do they document them.

1:15:04

Ming Qiu

Yes, so that needs to be included as part of your application when you submit it. Normally, you know, per the NOFO, only if the award, you know, is issued pursuant to the application that is only allowable expenses that you can, request reimbursement up to \$50,000. If the award is not selected, then there is no reimbursement on the application unless it's selected and awarded.

1:15:37

Cameron Lewis

Alright. So, with that being said, we are nearing the end of our webinar, but I would want to go around the horn. I will want to tap in with each of the

panelists and give them an opportunity to give closing remarks, any good lucks, anything that may be able to help you in these next closing days before December 1<sup>st</sup>, 2021.

1:15:59

The first person I would like to come to is Janice. Do you have anything to offer? I think you're still on mute.

Janice Wilkins

1:16:09

Just thank you all for allowing us to help you through this process. And, remember, submitting your applications early will allow you time for corrections and upload errors. And, again, if you need additional assistance, please reach out and good luck to all.

Cameron Lewis

1:16:37

Alright, thanks so much, Janice. Michell?

Michell Morton

1:16:43

I echo Janices's words of wisdom. Thank you for joining us for these webinars, and please reach out to us if you need any assistance. Oh, and good luck.

Cameron Lewis

1:16:56

Alright, Ming?

Ming Qiu

1:16:58

OK, thank you. I see a question that we didn't get to. I can take this to the answer regarding the format of the project narrative and submission, whether a PDF or Word file?

1:17:11

In Section 4.B.6, the project narrative, it states that the project narrative in the Word process document be not more than 20 single space [pages] or 40 double space [pages]. So, a Word document will be preferred and acceptable, and if you are converting a Word document to a PDF format, I think it's also acceptable.

1:17:36

But the NOFO states that it's a Word process document, so I would try to stay with the NOFO requirements. And I'd like to say thank you for your participation and hard work on the applications, and if you have any questions, feel free to reach out, and we're here to help. And just one reminder, you know, try to submit your application early, don't wait until the last minute. Sometimes the grants.gov website goes down for maintenance and, you know, make sure that you submit the application before the deadline.

1:18:08

Thank you, and good luck to you all.

Cameron Lewis

1:18:11

Alright, thank you Ming. Kevin?

Kevin Hughes

1:18:14

Just wanted to remind all potential applicants to please be sure that your registration in SAM.gov is up to date and current and that you have your DUNS registration number, excuse me. You will need both of those items in order to complete your application, so it's very important. Additionally, please be sure that you have an Adobe reader on your laptop or your desktop. You will need that to also be able to complete the application. So, those are two key things, and good luck in your submission of your application.

1:18:57

Cameron Lewis

Alright, thank you, Kevin. Emy?

1:18:59

Emy Tseng

Emy, I'm going to use Ming's lead, and just knockout a couple quick questions. One: Is it acceptable to prepare for mobile data plans over a period of six years? No. All funding must be for programmatic activities that actually happened during the proposed grant period. The other question is: can funding be used to purchase a mobile van technology hub? And it depends. You know, vehicles are allowable but you would have to make the case, in terms of reasonableness of costs that's the best way to achieve the objectives of your program. And then, another question that are often gets asked does that you don't have the unemployment insurance information for your students, and so, what can what data can you submit? And we're really encouraging you to submit data that justifies need.

1:20:05

So, for example, if you have, if you are community-based institution and you have information about income or poverty levels or unemployment in your local community, then that is acceptable supporting information. Basically, you just want to make sure that you provide us with data and information that makes the case for the need of your target populations for this program. So and also, good luck to everyone, but I thought I'd get that out of the way.

1:20:40

Cameron Lewis

Alright, thank you so much, Emy. And Scott, we'll come to you.

1:20:46

Scott Woods

Thank you. I just want to echo our sincere thanks on behalf of the CMC staff. As you can tell, we're very passionate about this subject matter, and also want to address an issue about the CMC Pilot program itself – [it] is a pilot program.

1:21:03

It's new, it's never been done before, and there are things in here that we are really requesting and seeking that you push the envelope on innovation. But, again, if you know your goal is to just address connectivity and devices for your students, that's OK. Right? You know your needs better than anyone else. And so, please be sure to read through the NOFO. Please be sure to address all of the requirements of the NOFO. And again, we wish you all good luck of the staff.

1:21:35

We will be here up and until the application due date, which is another week, you know, up until December 1, 2021. Please do not hesitate to reach out, but please also be cognizant that everyone's reaching out to us, and we're doing our best, our absolute best, to circle back and make sure that we can contact everyone. If we did not address your question today, I apologize, you know, please email us, we will get back to you. If you need a request for consultation, you know, please email us. And, again, we will do our best to ensure that you speak to someone from either the NIST Grants Office or the CMC Program team before the application due date. But on behalf of the team here, we want to say thank you. We look forward to implementing a successful project to come and wish everyone, everyone, good luck. So, thank you very much, and we appreciate your time today.

1:22:37

Cameron Lewis

Alright, thank you so much, Scott. I believe we have one slide that should be coming up, where you'll be able to find contact information for the team.

1:22:46

So if you have any questions, any concerns, as Scott said, we have a lot of people that are reaching out, but we will make sure to do our best to get any questions or concerns addressed prior to that December 1, 2021 [deadline], and I echo everybody else's sentiments saying do not wait until the last minute to get your application in.

1:23:07

As Scott always says, the worst things that are bound to happen at the worst moments, there's nothing you can do to control it. So with that being said, just make sure to get your application in as soon as possible and any questions or concerns, feel free to reach out. Alright, absolutely, good luck. Have a good one. And we look forward to seeing you guys soon.