# INTERNET FOR ALL

## Five-Year Action Plan

### Guidance

U.S. Department of Commerce
National Telecommunications and Information Administration

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# Internet For All

## Introduction

### *Overview of the Five-Year Action Plan Requirements*

An Eligible Entity that receives Initial Planning Funds must submit to the Assistant Secretary a Five-Year Action Plan that establishes the State[1] or Territory's broadband goals and priorities and serves as a comprehensive needs assessment that will inform the State or Territory's Initial Proposal.

**IMPORTANT**:

At minimum, an Eligible Entity's Five-Year Action Plan must include 13 requirements, which are detailed in the **BEAD Notice of Funding Opportunity (NOFO), Section IV.B.3.b**.

The Five-Year Action Plan is intended to provide a foundation for alignment with future Initial and Final Proposals. The Initial and Final Proposals developed for the Broadband Equity, Access, and Deployment (BEAD) Program should be informed by, complementary to, and expand upon the Eligible Entity's Five-Year Action Plans.

The **BEAD Notice of Funding Opportunity (NOFO), Section IV.B.3.b** details 13 requirements that must be responded to in an Eligible Entity's Five-Year Action Plan.

The Five-Year Action Plan must be submitted to NTIA within 270 days of receipt of Initial Planning Funds. The Assistant Secretary reserves the right to extend this deadline; however, the Assistant Secretary will be reluctant to grant a waiver except in extraordinary circumstances.

The NOFO states that the Assistant Secretary will publish at www.grants.ntia.gov an online template for submission of the Five-Year Action Plan. The use of this template is optional.

To the extent an Eligible Entity has an existing plan that meets the requirements set forth above and was completed within the 12 months prior to the date of receipt of Initial Planning Funds, it may submit that plan as its Five-Year Action Plan. If an Eligible Entity has an existing plan that was completed more than 12 months prior to the date of receipt of Initial Planning Funds, the Eligible Entity is encouraged to leverage material produced during previous planning efforts and make updates to meet the requirements of the Five-Year Action Plan. Additionally, if an Eligible Entity has an existing plan that meets the requirements set forth above in part, it may submit that plan as part of the Five-Year Action Plan, along with supplemental materials sufficient to fulfill all the requirements.[2]

If an Eligible Entity does not utilize the online template published by NTIA, the Eligible Entity must also provide an index, crosswalk, or similar document to allow the reader to quickly and efficiently locate relevant content. A sample crosswalk is included as an attachment to this document.

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[1] The term "State" means, for the purposes of the BEAD Program, any State of the United States, the District of Columbia, and Puerto Rico. *See* BEAD NOFO, Section I.C.v.

[2] Please note that an Eligible Entity may not use BEAD funds to pay for previously incurred costs (subject to limited exceptions described in Section IV.B.2 of this NOFO).

## *Five-Year Action Plan and State Digital Equity Plan Alignment*

The State Digital Equity Planning Grant (SDEPG) Program was authorized by the Infrastructure Investment and Jobs Act of 2021 (November 15, 2021), also known as the Bipartisan Infrastructure Law. The SDEPG Program is the first of three Digital Equity programs that provide new federal funding for grants to Eligible Entities to further advance federal goals relating to digital equity and digital inclusion.

It is anticipated that each Eligible Entity participating in the BEAD Program will concurrently participate in the SDEPG Program, and in many of the 13 requirements of the Five-Year Action Plan, there are opportunities to infuse digital inclusion activities to both satisfy requirements of the State Digital Equity Plan and ensure that digital inclusion is a core component of broadband planning.

**Requirement 11 of the Five-Year Action Plan may be satisfied by the completion of a State Digital Equity Plan under the SDEPG Program**, and Eligible Entities should consider the 15 requirements of the State Digital Equity Plan listed in the State Digital Equity Planning Grant Program NOFO as the minimum content necessary for this requirement. Eligible Entities should also refer to the NOFO for the exact requirements and deadlines applicable to that program.

Eligible Entities are encouraged to incorporate the State Digital Equity Plan into the Five-Year Action Plan, but it is also allowable to submit the State Digital Equity Plan as a separate document. If an Eligible Entity intends to submit its State Digital Equity Plan separately to satisfy Requirement 11 of the Five-Year Action Plan, it should note this explicitly in the text of the Five-Year Action Plan.

**State Digital Equity Planning Grant Program under the Digital Equity Act**

**(*see* SDEPG NOFO Section IV.C.1.b)**

The statutory requirements for the contents of State Digital Equity Plans are set forth in Section 60304(c)(1) of the Infrastructure Act, and are listed below:

1. Identification of barriers to digital equity faced by Covered Populations in the State.
2. Measurable objectives for documenting and promoting, among each Covered Population located in that State—
    a. The availability of, and affordability of access to, fixed and wireless broadband technology;
    b. The online accessibility and inclusivity of public resources and services;
    c. Digital literacy;
    d. Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and
    e. The availability and affordability of consumer devices and technical support for those devices.
3. An assessment of how the measurable objectives identified in item 2 of [the NOFO's] Section IV.C.1.b.i will impact and interact with the State's—
    a. Economic and workforce development goals, plans, and outcomes;
    b. Educational outcomes;
    c. Health outcomes;
    d. Civic and social engagement; and
    e. Delivery of other essential services.

4. In order to achieve the measurable objectives identified in item 2 of [the NOFO's] Section IV.C.1.b.i, a description of how the State plans to collaborate with key stakeholders in the State, which may include—
    a. Community anchor institutions;
    b. County and municipal governments;
    c. Local educational agencies;
    d. Where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;
    e. Nonprofit organizations;
    f. Organizations that represent—
        i. Individuals with disabilities, including organizations that represent children with disabilities;
        ii. Aging Individuals;
        iii. Individuals with language barriers, including—
            1. Individuals who are English learners; and
            2. Individuals who have low levels of literacy;
        iv. Veterans; and
        v. Individuals in that State who are incarcerated in facilities other than Federal correctional facilities;
    g. Civil rights organizations;
    h. Entities that carry out workforce development programs;
    i. Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;
    j. Public housing authorities in the State; and
    k. A partnership between any of the entities described in clauses (a) through (j).
5. A list of organizations with which the Administering Entity for the State collaborated in developing the Plan.

In addition to the above requirements, the State Digital Equity Plan developed with planning grant funds shall, at a minimum, include the following:

1. A stated vision for digital equity;
2. A digital equity needs assessment, including a comprehensive assessment of the baseline from which the State is working and the State's identification of the barriers to digital equity faced generally and by each of the covered populations in the State;
3. An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments;
4. To the extent not addressed in connection with item 4 of Section IV.C.1.b.i, a coordination and outreach strategy, including opportunities for public comment by, collaboration with, and ongoing engagement with representatives of each category of covered populations within the State and with the full range of stakeholders within the State;
5. A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan;
6. An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should (a) establish measurable goals, objectives, and proposed core activities to address the needs

of covered populations, (b) set out measures ensuring the plan's sustainability and effectiveness across State communities, and (c) adopt mechanisms to ensure that the plan is regularly evaluated and updated;

7. An explanation of how the implementation strategy addresses gaps in existing state, local, and private efforts to address the barriers identified pursuant to Section IV.C.1.b.i, item 1, of [the State Digital Equity Planning Grant Program] NOFO;
8. A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with:
    a. Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations;
    b. Labor organizations and community-based organizations; and
    c. Institutions of higher learning, including but not limited to four-year colleges and universities, community colleges, education and training providers, and educational service agencies;
9. A timeline for implementation of the plan; and
10. A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the Broadband Equity, Access, and Deployment Program, other federal or private digital equity funding.

## *How to use the Five-Year Action Plan Guidance and Template*

The following pages outline a proposed template and associated guidance to meet the 13 requirements of the Five-Year Action Plan. The proposed structure for the Five-Year Action Plan includes six sections:

- Executive Summary;
- Overview of the Five-Year Action Plan;
- Current State of Broadband and Digital Inclusion;
- Obstacles or Barriers;
- Implementation Plan; and
- Conclusion.

The appendix includes a list of the Five-Year Action Plan's 13 requirements, as written in the BEAD NOFO, Section IV.B.3.b.

The attachments include:

- A sample crosswalk to reflect alignment between an Eligible Entity's existing Five-Year Action Plans and the NOFO requirements; and
- A template for the Five-Year Action Plan.

The guidance—and template—are structured to align with the NOFO's 13 requirements. As such, the sections of the guidance with these requirements include call-out boxes with the NOFO language, for reference.

The guidance also includes an overview of the purpose of each proposed section, importance of the content for the success of the program, and other optional information and/or data that the Eligible Entity may consider when developing the Five-Year Action Plan.

Eligible Entities are not required to submit a Five-Year Action Plan in the structure or template proposed in this document. However, this document does include important guidance within each section as to how to interpret the NOFO's 13 requirements, which Eligible Entities must respond to in their Five-Year Action Plan.

# 1 Executive Summary

The Five-Year Action Plan should begin with a clear and concise executive summary. The Executive Summary should state the purpose and summarize the key points of the Five-Year Action Plan.

> As outlined in the BEAD NOFO, **NTIA plans to provide detailed technical assistance to Eligible Entities throughout the BEAD Program.**
>
> If you have any questions, or require technical assistance, in the development of the Five-Year Action Plan, **please reach out to your assigned Federal Program**

# 2 Overview of the Five-Year Action Plan

## 2.1 Vision

The purpose of this section is to provide a clear, specific picture of the Eligible Entity's vision for broadband deployment and digital equity.

The Eligible Entity may use this section to describe what success looks like for its State or Territory, inform strategies, serve as a guide for setting goals and objectives, and determine the activities the Eligible Entity will choose to prioritize in the Five-Year Action Plan.

Eligible Entities that are also utilizing funding from the SDEPG Program should ensure that the programs and plans are coordinated and that the visions for BEAD and SDEPG Programs are closely linked and aligned.

## 2.2 Goals and Objectives

In this section, the Eligible Entity will explicitly state its goals and objectives for broadband deployment and digital equity. The goals outlined in the Five-Year Action Plan will inform, and can meet later requirements, of the BEAD Initial Proposal as well as Final Proposal. As such applicants should consider long-term objectives for deploying broadband, closing the digital divide, addressing access, affordability, equity and adoption issues, and enhancing economic growth and job creation.

Goals are achievable outcomes that are generally broad and long-term. In the context of the Five-Year Action Plan, example goals of an Eligible Entity may include:

- Ensure all residents of the State or Territory have access to high-speed internet irrespective of their location within the State or Territory
- Empower local municipalities to develop and implement lasting broadband infrastructure across the State or Territory
- Close the remaining digital divide within the State or Territory and reduce digital inequalities among all citizens

Objectives are specific, measurable, attainable, relevant, and time-based. They support the attainment of the goals. Example objectives may include:

- Develop broadband investment and deployment strategies for unserved and underserved areas
- Leverage all federal sources of broadband funding to achieve the Eligible Entity's broadband deployment and digital inclusion goals
- Develop and strengthen partnerships with community stakeholders to identify opportunities for State or Territory support and coordinate initiatives

The Eligible Entity may choose to outline the long-term goals and objectives for deploying broadband and closing the digital divide, specifically addressing:

**Broadband Deployment**

**Broadband Access**

**Broadband Adoption**

**Broadband Affordability**

**Digital Equity**

**Economic Growth and Job Creation**

The Eligible Entity may include information from any existing strategic plan otherwise developed by the Eligible Entity, if applicable.

# 3 Current State of Broadband and Digital Inclusion

## 3.1 Existing Programs

**Relevant Requirements from the NOFO Section IV.B.3.b:**

- Provide details of the existing broadband program or office within the Eligible Entity, including:
  - any activities that the program or office currently conducts,
  - any previous entity-wide plans or goals for availability of broadband, and
  - any prior experience awarding broadband deployment grants. Req.1
- Identify the funding that the Eligible Entity currently has available for broadband deployment and other broadband-related activities, including:
  - data collection and local planning, and
  - the sources of that funding, including whether the funds are from the Eligible Entity or from the federal government. Req. 2
- Identify existing efforts funded by the federal government, including the Universal Service Fund, or an Eligible Entity to deploy broadband and close the digital divide. Req. 3
- Identify the current full-time and part-time employees of the Eligible Entity who will assist in implementing and administering the BEAD Program and the duties assigned to those employees, as well as any existing contracted support, and any planned expansion of employees or contractors. Req. 4

The purpose of this section is to document the resources—including structural, financial, programs, and personnel—available to the Eligible Entity. This section should also evaluate the state of the current broadband program or office within the Eligible Entity. Documenting the current state of broadband and digital inclusion is key to identifying the resources and relationships available to the Eligible Entity, understanding what gaps and barriers may exist, and informing and improving future planning and implementation of program or office activities to effectively carry out its goals and objectives.

The following tables are provided in the template to assist Eligible Entities in gathering and documenting information in a simple, structured manner, along with some illustrative examples.

**Table 1: Current Activities that the Broadband Program/Office Conducts**

Use this table to identify the current activities, which should include, but are not limited to:

- Any activities that the program or office currently conducts;
- Any previous entity-wide plans or goals for availability of broadband; and
- Any prior experience awarding broadband deployment grants.

| Activity Name | Description | Intended Outcome(s) |
|---|---|---|
| *Name of activity* | *Brief description of activity* | *Brief list of intended outcome(s)* |
| *Ex: Roundtable Discussions* | *Eligible Entity hosted a series of roundtable discussions across the State or Territory to identify broadband needs and challenges and solicit input from local stakeholders* | *Observations and feedback from community outreach will inform the development of the Eligible Entity's broadband plan, objectives, and implementation approach* |

| | | |
|---|---|---|
| *Ex: State Broadband Council* | *Eligible Entity established an interagency council of state agencies to coordinate on ongoing and planned broadband initiatives* | *The council will enable a coordinated and streamlined approach to broadband projects proposed across Eligible Entity agencies* |

**Table 2: Current and Planned Full-Time and Part-Time Employees**

Use this table to identify the current and planned employees that will assist in implementing and administering the BEAD Program and the duties assigned to those employees.

| Current/ Planned | Full-time/ Part-time | Position | Description of Role |
|---|---|---|---|
| *Current or Planned* | *FT or PT* | *Position* | Brief description of role |
| *Ex: Current* | *Full-time* | *Outreach Coordinator* | *Oversees and manages local coordination and stakeholder engagement activities* |
| *Ex: Planned* | *Part-time* | *Grant Coordinator* | *Oversees all grant management activities and ensures compliance with federal regulations* |

**Table 3: Current and Planned Contractor Support**

Use this table to identify the current and planned contractors that will assist in implementing and administering the BEAD Program and the duties assigned to those employees.

| Current/ Planned | Time | Position | Description of Role |
|---|---|---|---|
| *Current or Planned* | *FT or PT* | *Contractor Position* | *Brief description of contractor's role* |
| *Ex: Planned* | *FT* | *Digital equity Subject Matter Expert* | *Provides targeted support related to efforts that promote digital literacy, equity, and inclusion* |
| *Ex. Planned* | *FT* | *GIS Data Analyst* | *Provides support to build Eligible Entity's broadband availability maps, and support FCC Mapping and Challenge Process* |

**Table 4: Broadband Funding**

Use this table to identify the funding from various sources, including its own, that the Eligible Entity currently has available for broadband deployment and other broadband-related activities. Examples of funding include, but are not limited to, other NTIA competitive grant programs, USDA telecom and broadband programs, American Rescue Plan funding, Treasury funding, and other federal, state, and local government programs.

The Eligible Entity may consider resources, such as USASpending.gov to populate this table and identify funding sources being spent within a State or Territory. The funding could be stated as a sum total for each of the funding programs.

| Source | Purpose | Total | Expended | Available |
|---|---|---|---|---|
| *Name of federal agency/ other source of funding* | *Brief description of broadband deployment and other broadband-related activities* | *$X,000,000* | *$X00,000* | *$X00,000* |
| *Ex: American Rescue Plan Act* | *Development of statewide geospatial datasets to enhance capacity for broadband mapping; expansion and improvement of connectivity in public spaces* | *$39,000,000* | *$25,000,000* | *$14,000,000* |
| *Ex: USDA ReConnect* | *Deployment of 92 miles of fiber to provide high-speed internet to remote, underserved counties* | *$6,000,000* | *$4,100,000* | *$1,900,000* |

In addition to the relevant requirements above, Eligible Entities may also choose to include information or resources related to broadband deployment and digital inclusion, including existing state policies, mapping, or other technological resources used to inform broadband-related activities, studies and best practices, or outreach endeavors.

## 3.2 Partnerships

**Relevant Requirements from the NOFO, Section IV.B.3.b**

- ...[identify] and [provide] details regarding any relevant partners, such as community-based organizations and CAIs that may inform broadband deployment and adoption planning. Req.6

The purpose of this section is to identify and assess new or existing partners that the Eligible Entity may engage for the development and implementation of the Five-Year Action Plan. Such partners may include organizations that are already engaged in issues related to broadband deployment and digital inclusion, such as local governments, college and university systems, school systems, faith-based organizations, foundations, chambers of commerce, and local internet service providers, as well as potential new partners that are not yet engaged in this work or not yet an established partner of the Eligible Entity.

The template includes the table below:

**Table 5: Partners**

Use this table to identify the partners that may inform the development and implementation of the Five-Year Action Plan.

| Partners | Description of Current or Planned Role in Broadband Deployment and Adoption |
|---|---|
| *Name of Partner* | *Brief description of the current or planned role of the partner for broadband deployment and adoption in the State or Territory.* |
| *Ex: Broadband Nonprofit* | *Eligible Entity has existing partnership with Broadband Nonprofit to support digital equity initiatives, which focuses on research, community planning and capacity building. Eligible Entity plans to continue partnership with Nonprofit to engage local communities and understand their broadband goals and needs* |
| *Ex: Internet Service Providers* | *Eligible Entity plans to partner with local internet service providers to track and report on the progress of broadband adoption within the State or Territory* |
| *Ex: Community-Based Organization* | *Eligible Entity will partner with community-based organization to increase local stakeholder participation and outreach. The organization will help coordinate and host local events and produce outreach materials to inform local community members about ongoing broadband efforts.* |

In addition to the relevant requirements above, Eligible Entities may also consider examining the partners' current and potential roles, skills, and expertise as it relates to achieving the goals of the BEAD program and those set forth by the Eligible Entity in its Five-Year Action Plan. Eligible Entities may also choose to identify potential partners that have the capacity or potential interest in engaging in issues related to broadband deployment and digital inclusion.

## 3.3 Asset Inventory

**Relevant Requirements from the NOFO, Section IV.B.3.b:**

- Include an asset inventory that catalogues broadband adoption, affordability, equity, access, and deployment activities occurring within the Eligible Entity… Req.6

The purpose of this section is to catalogue the Eligible Entity's unique assets related to:

- **Broadband Deployment** (3.3.1)
- **Broadband Access** (3.3.4)
- **Broadband Adoption** (3.3.2)
- **Broadband Affordability** (3.3.3)
- **Digital Equity** (3.3.4)

This asset inventory is intended to capture both existing hard assets (e.g., towers, buildings, utility poles) and soft assets—or efforts (e.g., programs, activities, strategies, skills, technical assistance) that can be leveraged to close the digital divide. States should do their best to conduct a comprehensive assessment. However, states are not required to develop an exhaustive inventory and should focus on assets that can readily be leveraged, such as those that are publicly owned in the case of hard assets. Identifying and taking inventory of what resources are available to implement the Five-Year Action Plan is critical to ensuring that Eligible Entities are not only able to identify the needs and gaps as it pertains to broadband deployment and digital equity in the State or Territory, but also to identify what assets – such as organizations, physical spaces, people, and institutions – are available to achieve the goals and objectives of the Eligible Entity. This section will directly inform the development of the BEAD Initial Proposal.

Potential resources the Eligible Entity may consider as they design their asset inventory include the NTIA Internet Use Survey, NTIA Indicators of Broadband Need Map, and American Community Survey.

As Eligible Entities conduct their inventory of assets, please note that while the NOFO outlines specific data sources the Eligible Entity may consider to meet Requirement 8 (*see* Appendix I), the Eligible Entity should not feel bound to these and should incorporate the best available data, including data collected as a part of the Bipartisan Infrastructure Law funding. **If data or other information is unclear or unavailable, please identify any plans to clarify and/or obtain this data.**

**IMPORTANT**:

If data or other information necessary for the asset inventory is unclear or unavailable, please identify any plans to clarify and/or obtain this data.

**What is an Asset?**

*For the purposes of the BEAD 5-Year Action Plan, "assets" refers to both:*

**Hard Assets**
Such as towers, buildings, utility poles

**Soft Assets**
Such as programs, activities, strategies, skills, technical assistance

### 3.3.1 Broadband Deployment

The following list includes example assets that the Eligible Entity may identify and detail:

- State or Territory owned structures and utility infrastructure that providers could utilize at low- or no-cost for broadband deployment (e.g., towers, water towers, silos, buildings, utility poles);
- State or Territory owned land that providers could utilize at low-or no-cost for broadband deployment;
- Existing rights of way;
- Conduits or dark fiber deployed by the State/Territory or other government entities;
- Current or forthcoming capital projects, which would allow providers to lay new fiber at lower costs (e.g., road construction, water, or sewer projects); and
- Highly skilled workforce available to deploy broadband.

### 3.3.2 Broadband Adoption

The following list includes example assets that the Eligible Entity may identify and detail:

- Percentage of residents within the State/Territory who have adopted broadband;
- Programs that provide digital literacy and digital skills training;
- Programs that provide subsidized or low-cost devices (e.g., computers, tablets);
- Digital Navigator programs;
- Programs that conduct awareness and outreach activities of digital inclusion programming and resources (e.g., marketing and awareness campaigns);

- Existing ISP programs that promote adoption (e.g., adoption campaigns, low-cost plans, digital inclusion initiatives);
- Incentives (e.g., subsidies, tax benefits) for incorporation of broadband across different sectors (e.g., education, agriculture, economic development, telemedicine);
- Public computing labs;
- Loaner computer/hotspot programs;
- Programs that offer discounted or low-cost devices with affordable maintenance costs;
- K-12 school system one-to-one computer programs;
- Computer refurbishing programs; and/or
- Digital equity/inclusion coalitions.

### 3.3.3 Broadband Affordability

The following list includes example assets that the Eligible Entity may identify and detail:

- The number of residents eligible for the Affordable Connectivity Program (ACP), the percent of eligible residents who have accessed the ACP, and the steps taken to increase enrollment in the ACP;
- Discount or subsidized broadband service and equipment programs;
- Utility assistance programs for consumers with limited incomes; and/or
- Provider agreements and contracts that are near expiration (i.e., provide the opportunity for new agreements and contracts that provide more affordable broadband services).

### 3.3.4 Broadband Access

The following list includes example assets that the Eligible Entity may identify and detail:

- Public Wi-Fi and networks;
- Public access points;
- Cellular connectivity (Mobile Broadband); and/or
- Open access middle mile networks.

### 3.3.5 Digital Equity

The following list includes example assets that the Eligible Entity may identify and detail:

- Workforce development training and employment services related to broadband adoption (e.g., computer/digital skills training, apprenticeships);
- Technical assistance to support digital inclusion (i.e., Digital Navigators who provide community members with support to access and utilize home internet connectivity, devices, digital skills, etc.);
- Civic and volunteer organizations that provide volunteer and advocacy assistance for digital equity programs; and/or
- Taskforces or place based coalitions that work towards digital equity and include a diverse group of stakeholders in the State or Territory (e.g., engagement with ISPs, state

agencies, local community champions, local governments, tribal leaders, community-based organizations, libraries, educational institutions, local businesses, federal landowners, residents, etc.

## 3.4 Needs and Gaps Assessment

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Identify local and regional broadband service needs and gaps within the Eligible Entity's boundaries, including unserved or underserved locations and CAIs without gigabit service, and/or any plans to make these determinations where service availability is unclear. Req. 9
- Identify digital equity and inclusion needs, goals, and implementation strategies, including ways in which the Eligible Entity plans to utilize BEAD funding, Digital Equity Act funding and/or other funding streams in concert to remedy inequities and barriers to inclusion. Accordingly, the Five-Year Action Plan should set forth a vision for digital equity, include the results of a needs assessment for underrepresented communities and an asset inventory of ongoing digital equity activities, and detail holistic strategies around affordability, devices, digital skills, technical support, and digital navigation. This requirement may be satisfied by the completion of a State Digital Equity Plan under the Digital Equity Act. Req. 11
- Incorporate available federal, Eligible Entity, or local broadband availability and adoption data, including but not limited to Affordable Connectivity Program enrollment data. Other federal broadband data sources include the NTIA Internet Use Survey, the NTIA Indicators of Broadband Need Map, and the American Community Survey. Req. 8

The purpose of this section is to identify the gaps between the current state and needs of broadband deployment and digital equity in the State or Territory. Conducting a needs and gap assessment will include needs identification, data collection, and analysis and evaluation.

Potential resources that the Eligible Entity may consider as they design their needs and perform gap assessment are outlined in the following sub-sections.

Please note that while the NOFO outlines specific data sources that the Eligible Entity may consider to meet Requirement 8 (NTIA Internet Use Survey, the NTIA Indicators of Broadband Need Map, and the American Community Survey), it should not feel bound to these and should incorporate the best available data, including data collected as a part of the Bipartisan Infrastructure Law funding. **If data or other information is unclear or unavailable, please identify any plans to clarify and/or obtain this data.**

### 3.4.1 Broadband Deployment

The Eligible Entity may identify and detail the needs and gaps in the State or Territory, which may include, but is not limited to the following need for:

- Service to unserved locations;
- Service to underserved locations;
- Service to Community Anchor Institutions (CAIs) without gigabit service;
- Development of a dedicated broadband office or governance structure to facilitate integration of broadband efforts in the State or Territory;
- Legislative and/or regulatory solutions to overcome barriers or to accelerate infrastructure deployment;
- Solutions to funding barriers in designated "high-cost areas," as defined by the BEAD NOFO, Section I.C.m;
- Improved databases and/or systems that enhance use of information to inform broadband deployment; and/or
- Increased workforce available to deploy broadband.

**FCC Broadband Data Maps**

If available, the Eligible Entity should utilize the most recently published FCC Broadband Data Maps as of the date of submission of the Five-Year Action Plan and identify the date of publication used for such identification. The Eligible Entity may choose to include maps, location lists, etc. in Appendices or using embedded links.

### 3.4.2 Broadband Adoption

The Eligible Entity may identify and detail the needs and gaps in the State or Territory, which may include, but is not limited to the following need for:

- Improved digital literacy;
- Increased household broadband subscription;
- Increased households, businesses, and CAIs with access to internet-capable devices; and/or
- Increased emphasis on multi-sector strategies to broadband adoption (e.g., from educational, agricultural, economic development, and telemedicine perspectives).

### 3.4.3 Broadband Affordability

The Eligible Entity may identify and detail the needs and gaps in the State or Territory, which may include, but is not limited to the following need for:

- Increased support for enrollment in assistance programs (such as ACP) for low-income consumers; and/or
- Increased financial assistance for low-income consumers;
- Increased options for broadband services, including a wider range of low-cost services.

### 3.4.4 Broadband Access

The Eligible Entity may identify and detail the needs and gaps in the State or Territory, which may include, but is not limited to the following need for:

- Increase in public Wi-Fi and networks;
- Increase in public access points; and/or
- Increase in cellular connectivity (Mobile Broadband).

### 3.4.5 Digital Equity

The Eligible Entity may identify and detail the needs and gaps in the State or Territory, which may include, but is not limited to the following need for:

- Increased workforce development training and employment services related to broadband deployment and adoption;
- Increased participation in the digital economy by communities traditionally disengaged;
- Greater resources to support digital inclusion (i.e., organizations and/or funding for Digital Navigators); and/or
- Increased engagement with community-based organizations, CAIs, digital inclusion/equity coalitions, state agencies, local community champions, tribal leaders, and federal landowners

# 4 Obstacles or Barriers

**Relevant Requirements from the NOFO, Section IV.B.3.b:**

- Identify known or potential obstacles or barriers to the successful implementation of the BEAD Program and the Eligible Entity's corresponding plans to address them. Req. 5

The purpose of this section is to proactively identify the obstacles or barriers that the State or Territory may encounter as it implements the BEAD program—and more generally, as it addresses issues related to broadband deployment and digital inclusion.

Eligible Entities may consider a variety of topics in their assessment, including, but not limited to:

- Legislative or regulatory barriers;
- Labor shortages;
- Supply chain issues;
- Materials availability;
- Industry participation;
- Lack of local digital inclusion programs/expertise;
- Topography
- Digital literacy; and/or
- Procurement or contracting issues.

The Eligible Entity may also include other relevant information that provides overarching context for the Five-Year Action Plan, such as recent policy shifts, demographic trends, or key issues resulting from insufficient broadband access and resources.

# 5 Implementation Plan

## 5.1 Stakeholder Engagement Process

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Include a description of the Eligible Entity's external engagement process, demonstrating collaboration with local, regional, and Tribal (as applicable) entities (governmental and non-governmental) and reflective of the local coordination requirements outlined herein, including outreach to underrepresented communities and unions and worker organizations. The engagement required must be undertaken both during the development of the Five-Year Action Plan itself and following submission of the plan, reflecting ongoing collaboration throughout the BEAD Program. Req. 7

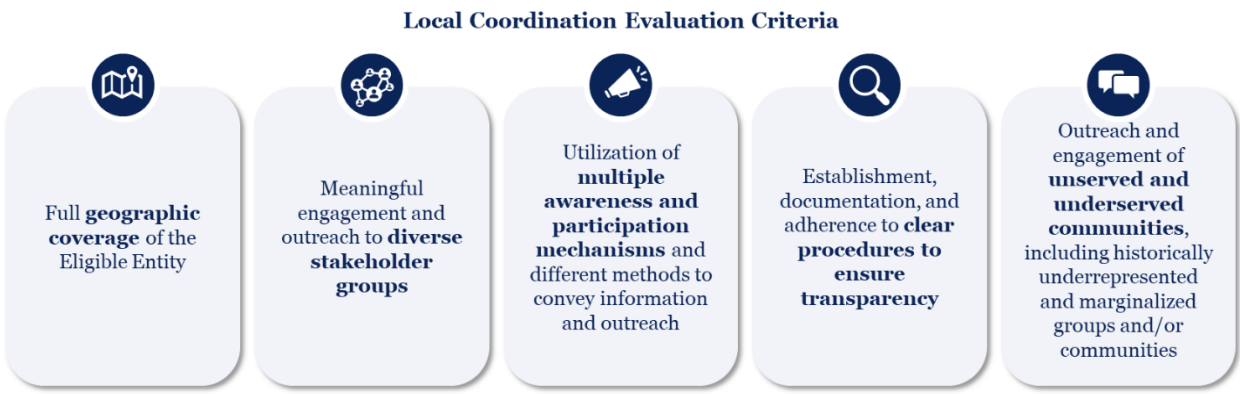
**IMPORTANT**:

Eligible Entities may also choose to include a description of how they will engage with other interested stakeholders, including those that have historically been left out of public planning processes

The purpose of this section is to identify how the Eligible Entity will go about identifying key external stakeholders and stakeholder groups, develop an inclusive engagement model and associated mechanisms (e.g., feedback mechanism), and facilitate the stakeholder engagement process. Additionally, Eligible Entities must include what engagement processes were undertaken *while developing the Five-Year Action Plan itself*. This will enable the Eligible Entity to solicit a wide range of input into, and identify and reconcile concerns with, the Five-Year Action Plan. Eligible Entities that are also utilizing funding from the State Digital Equity Planning Grant Program (SDEPG) should ensure that the stakeholder engagement that is conducted for the purposes of that plan is coordinated and aligned with the stakeholder engagement conducted for the development of the Five-Year Action Plan. For example, for both efforts, Eligible Entities should assemble comprehensive lists of stakeholders, identify overlaps, and coordinate or combine outreach to those stakeholders through combined listening sessions, surveys, and site visits. This will be particularly important to avoid confusion and reduce the burden on community stakeholders.

Each Eligible Entity should also include a description of how it will engage with other interested stakeholders, including those that have historically been left out of public planning processes. Additionally, the Five-Year Action Plan must be informed by collaboration with Tribal Entities as applicable. It is the responsibility of the Eligible Entity under the BEAD Program and a state's Administering Entity for the State Digital Equity Planning Grant Program to understand the landscape of Tribal and Native Entites and to coordinate with and initiate stakeholder communication. State Digital Equity Planning Grant funding may also be used by Tribal entities to create their own digitial equity plans and/or to support Tribal participation in the creation of relevant State Digital Equity Plans. BEAD Five-Year Action Plans should aim to encapsulate not only State Digital Equity Plans but also any relevant tribal digital equity plans in order to present a holistic view of efforts to close the digital divide.

Eligible Entities need to specifically address the five local coordination criteria mentioned in the NOFO Section IV.C.1.c, which includes:




Outreach and engagement of unserved, underserved, and underrepresented communities should include covered populations, which are core stakeholder groups for the State Digital Equity Plan. Covered populations include (*see* SDEPG NOFO Section I.C.g):

1. Individuals who live in covered households;
2. Aging individuals;
3. Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
4. Veterans;
5. Individuals with disabilities;
6. Individuals with a language barrier, including individuals who—
    a. Are English learners; and
    b. Have low levels of literacy;
7. Individuals who are members of a racial or ethnic minority group; and
8. Individuals who primarily reside in a rural area.

As described, outreach to these groups should be conducted in tandem with any team members or entities charged with developing the State Digital Equity Plan.

## 5.2 Priorities

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Provide a comprehensive, high-level plan for providing reliable, affordable, high-speed internet service throughout the Eligible Entity, including:
    - Prioritization of areas for federal support. Req. 10.c

The purpose of this section is to outline the principles that the State or Territory will consider as it develops and implements the Five-Year Action Plan. These priorities should be aligned with the vision for broadband deployment and digital inclusion in the State or Territory.

The template includes the table below:

**Table 6: Priorities for Broadband Deployment and Digital Equity**

Use this table to outline the key priorities for the State or Territory. These priorities should be reflected in the planned activities for the Five-Year Action Plan.

| Priority | Description |
|---|---|
| *Name of Priority* | *Brief description of the priority* |

| | |
|---|---|
| *Ex: Leverage Existing Assets and Construction* | *Identify property within the State or Territory for possible use for broadband infrastructure to accelerate broadband deployment* |
| *Extremely High-Cost Location Deployment* | *Eligible Entities to set the Extremely High Cost Per Location Threshold as high as possible to help ensure that end-to-end fiber projects are deployed wherever feasible* |

In addition to the statutory requirements of the BEAD program to deploy broadband service to unserved and underserved locations, Eligible Entities may consider potential priorities including, but not limited to:

- Reducing costs and barriers to deployment;
- Promoting the use of existing infrastructure;
- Promotion and adoption of dig-once policies;
- Reducing the cost of broadband service for consumers;
- Promoting streamlined permitting processes and cost-effective access to poles, conduits, easements, and rights of way, including the imposition of reasonable access requirements;
- Engagement with relevant stakeholders to inform selection of activities to receive federal funding;
- Use of public-private partnerships or cooperatives in addressing the needs of the Eligible Entity's residents;
- Increasing opportunities for community-based organizations and other stakeholders to support broadband adoption and digital inclusion;
- Enhancing the subgrantee selection process; and/or
- Recruiting minority businesses, women-owned business enterprises, and labor surplus area firms.

**NOTE**:

Consideration of whether to use public-private partnerships or cooperatives may help the Eligible Entity determine how best to serve unserved locations and is not intended to favor any potential provider. Also note that cooperative could refer to a number of entities, such as a telecommunications cooperative or an electric cooperative.

## 5.3 Planned Activities

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Provide a comprehensive, high-level plan for providing reliable, affordable, high-speed internet service throughout the Eligible Entity, including:
  - The planned utilization of federal, Eligible Entity, and local funding sources. Req. 10.b

The purpose of this section is to identify activities that the Eligible Entity intends to implement to meet its goals and objectives, including the source of their funding.

Eligible Entities may choose to outline the following:

- Activities that support universal service;
- Key player(s) to implement the activities;

- Funding sources for the activities; and/or
- Expected outcome(s) for the activities.

The Eligible Entity should articulate anticipated funding gaps for completing deployment to all unserved and underserved locations.

## 5.4 Key Strategies

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Provide a comprehensive, high-level plan for providing reliable, affordable, high-speed internet service throughout the Eligible Entity, including:
  - Any consideration afforded to the use of public-private partnerships or cooperatives in addressing the needs of the Eligible Entity's residents. Req. 10.d
  - Strategies to address affordability issues, including but not limited to strategies to increase enrollment in the Affordable Connectivity Program by eligible households. Req. 10.e
  - Strategies to ensure an available and highly skilled workforce (including by subgrantees, contractors, and subcontractors) to minimize project disruptions, including any plans to ensure strong labor standards and protections, such as those listed in Section IV.C.1.e; and plans to attract, retain, or transition the skilled workforce needed to achieve the plan's goals, including describing the involvement and partnerships of sub-grantees, contractors, and sub-contractors with existing in-house skills training programs, unions and worker organizations; community colleges and public school districts; supportive services providers; Registered Apprenticeship programs and other labor-management training programs, or other quality workforce training providers. Req. 10.f

The purpose of this section is to outline the key strategies that the Eligible Entity will undertake to meet its goals and objectives, and to align with and maintain compliance with the statutory requirements of the BEAD program. The development of these strategies will directly feed into the development of the processes required as part of the BEAD Initial and Final proposals.

The Eligible Entity may provide additional information related to key execution strategies, including, but not limited to the subgrantee process. For example, the Eligible Entity may choose to outline their methodology to develop this process.

**Developing a Subgrantee Process**

**The 5-Year Action Plan is intended to feed into the BEAD Initial and Final Proposals. One aspect of the proposals is to outline a subgrantee process.**

**Topics to consider when outlining the methodology to develop a subgrantee process may include processes to:**

| | | |
|---|---|---|
| Competitively award subgrants consistent with Section IV.B.7.a of the BEAD NOFO regarding both **last-mile broadband deployment projects** and **other eligible activities** | Ensure that subgrantees, contractors, and subcontractors use **strong labor standards** and protections, such as those listed in Section IV.C.1.e, and how the Eligible Entity will **implement** and **apply the labor-related subgrantee selection criteria** described in Section IV.C.1.e of the BEAD NOFO | Monitor and oversee subgrantees to ensure that they **comply with the eligible uses prescribed** under the BEAD Program, in accordance with 2 C.F.R. §§ 200.101(b)(2); 200.331; 47 U.S.C. § 1608, and any sections therein; and all subgrantees **comply with reporting requirements** in accordance with BEAD NOFO Section VII.E.2 |

## 5.5 Estimated Timeline for Universal Service

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Provide a comprehensive, high-level plan for providing reliable, affordable, high-speed internet service throughout the Eligible Entity, including:
  - The estimated timeline… for universal service. Req. 10.a

The purpose of this section is to provide an estimate of when reliable, affordable, high-speed internet will be made available throughout the Eligible Entity.

Eligible Entities may consider including the conditions that may impact the estimated timeline—including those that would extend or escalate the timeline, such as supply chain issues or labor shortages. [3]

**What is Universal Service?**

- Universal service is the principle that all Americans should have access to both telecommunications and high-speed internet at just, reasonable, and affordable rates.
- Universal service is codified in the Telecommunications Act of 1996, which established principles for universal service that specifically focus on increasing access to evolving services for consumers living in rural and insular areas, and for consumers with low-incomes. Additional principles call for increased access to high-speed Internet in the nation's schools, libraries and rural health care facilities.

[3] *See Universal Service*, FEDERAL COMMUNICATIONS COMMISSION (available at https://www.fcc.gov/general/universal-service.)

## 5.6 Estimated Cost for Universal Service

**Relevant Requirements from the NOFO, Section IV.B.3.b:**

- Provide a comprehensive, high-level plan for providing reliable, affordable, high-speed internet service throughout the Eligible Entity, including:
  - The estimated… cost for universal service. Req. 10.a

The purpose of this section is to provide an estimate of how much it will cost to provide access to reliable, affordable, high-speed internet throughout the Eligible Entity.

Eligible Entities may consider broadband network support from NTIA competitive grant programs, USDA telecom and broadband programs, FCC funds such as the Connect America Fund (also known as Universal Service Fund (USF) High-Cost Support), Treasury funds, and other federal, state, and local government programs.

**NOTE:**

Eligible Entities should include all sources of program funding here, detailing from which programs they are receiving funds (i.e., USDA).

## 5.7 Alignment

**Relevant Requirements from the NOFO, Section IV.B.3.b:**

- Detail alignment of the Five-Year Action Plan with other existing and planned economic development, telehealth, workforce development, and related connectivity efforts, and other Eligible Entity priorities. Req. 12

The purpose of this section is to explain how the Five-Year Action Plan is aligned to the Eligible Entity's priorities and other existing or planned efforts. Eligible Entities should assess the landscape of ongoing or planned efforts in the State or Territory that are complementary to, may be enabled by, or may overlap with proposed BEAD projects and priorities. This may include, but is not limited to, efforts driven by the State or Territory's policy and legislation or efforts funded by other grant programs. Eligible Entities should detail how the priorities and planned activities outlined in the Five-Year Action plan will build upon or complement, not duplicate, these efforts in order to maximize available funding. Per Requirement 11, this should also include the State Digital Equity Plan under the Digital Equity Act, if applicable.

Eligible Entities may choose to identify plans to support, local, Tribal, and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide and describe coordination with local and Tribal Governments, along with local, Tribal, and regional broadband planning processes. This will directly inform the BEAD Initial and Final Proposals.

## 5.8 Technical Assistance

**Relevant Requirements from the NOFO, Section IV.B.3.b :**

- Describe technical assistance and additional capacity needed for successful implementation of the BEAD Program. Req. 13

The purpose of this section is to outline the support and technical assistance that the Eligible Entity will need to ensure that the Initial and Final Proposals fully meet the requirements of the statute and the goals of the BEAD Program. Each Eligible Entity is not expected to have every question related to its broadband program or planned activities answered at the time of submission of its Five-Year Action Plan. This section provides an opportunity for the Eligible Entity to articulate the support that it may need from NTIA in order to successfully implement the BEAD Program.

Eligible Entities should also articulate data or information that is needed to further inform the execution of the Five-Year Action Plan (e.g., more granular data or further outreach), in addition to any plans to obtain this data in the future.

**IMPORTANT**:

As outlined in the BEAD NOFO, **NTIA plans to provide detailed technical assistance to Eligible Entities throughout the BEAD Program.**

If you have any questions, or require technical assistance, in the development of the Five-Year Action Plan, **please reach out to your assigned Federal Program Officer.**

# 6 Conclusion

The purpose of this section is to provide a conclusion that reiterates the purpose and key points of the Five-Year Action Plan, as well as the high-level plan that the Eligible Entity intends to follow to achieve its goals.

The Eligible Entity may also choose to provide insight into the expected impact of its execution of the Five-Year Action Plan on broadband deployment and digital inclusion for the State or Territory and close with an argument for the endeavor.

# 7 Appendices

## 7.1 The 13 Requirements that must be in a Five-Year Action Plan

At a minimum, the BEAD NOFO requires that an Eligible Entity's Five-Year Action Plan must:

1. Provide details of the existing broadband program or office within the Eligible Entity, including any activities that the program or office currently conducts, any previous entity-wide plans or goals for availability of broadband, and any prior experience awarding broadband deployment grants.
2. Identify the funding that the Eligible Entity currently has available for broadband deployment and other broadband-related activities, including data collection and local planning, and the sources of that funding, including whether the funds are from the Eligible Entity or from the federal government.
3. Identify existing efforts funded by the federal government, including the Universal Service Fund, or an Eligible Entity to deploy broadband and close the digital divide.
4. Identify the current full-time and part-time employees of the Eligible Entity who will assist in implementing and administering the BEAD Program and the duties assigned to those employees, as well as any existing contracted support, and any planned expansion of employees or contractors.
5. Identify known or potential obstacles or barriers to the successful implementation of the BEAD Program and the Eligible Entity's corresponding plans to address them.
6. Include an asset inventory that catalogues broadband adoption, affordability, equity, access, and deployment activities occurring within the Eligible Entity and identifies and provides details regarding any relevant partners, such as community-based organizations and CAIs that may inform broadband deployment and adoption planning.
7. Include a description of the Eligible Entity's external engagement process, demonstrating collaboration with local, regional, and Tribal (as applicable) Entities (governmental and non-governmental) and reflective of the local coordination requirements outlined herein, including outreach to underrepresented communities and unions and worker organizations. The engagement required must be undertaken both during the development of the Five-Year Action Plan itself and following submission of the plan, reflecting ongoing collaboration throughout the BEAD Program.
8. Incorporate available federal, Eligible Entity, or local broadband availability and adoption data, including but not limited to Affordable Connectivity Program enrollment data. Other federal broadband federal data sources include the NTIA Internet Use Survey[4], the NTIA Indicators of Broadband Need Map[5], and the American Community Survey.[6]

[4] *See* NTIA Data Central, https://www.ntia.gov/data.
[5] *See* Indicators of Broadband Need Map, https://broadbandusa.ntia.gov/indicatorsmap.
[6] See American Community Survey (ACS), https://www.census.gov/acs.

9. Identify local and regional broadband service needs and gaps within the Eligible Entity's boundaries, including unserved or underserved locations and CAIs without gigabit service, and/or any plans to make these determinations where service availability is unclear.
10. Provide a comprehensive, high-level plan for providing reliable, affordable, high-speed internet service throughout the Eligible Entity, including:
    a. The estimated timeline and cost for universal service,
    b. The planned utilization of federal, Eligible Entity, and local funding sources,
    c. Prioritization of areas for federal support,
    d. Any consideration afforded to the use of public-private partnerships or cooperatives in addressing the needs of the Eligible Entity's residents,
    e. Strategies to address affordability issues, including but not limited to strategies to increase enrollment in the Affordable Connectivity Program by eligible households; and
    f. Strategies to ensure an available and highly skilled workforce (including by subgrantees, contractors, and subcontractors) to minimize project disruptions, including any plans to ensure strong labor standards and protections, such as those listed in Section IV.C.1.e; and plans to attract, retain, or transition the skilled workforce needed to achieve the plan's goals, including describing the involvement and partnerships of sub-grantees, contractors, and sub-contractors with existing in-house skills training programs, unions and worker organizations; community colleges and public school districts; supportive services providers; Registered Apprenticeship programs and other labor-management training programs, or other quality workforce training providers.
11. Identify digital equity and inclusion needs, goals, and implementation strategies, including ways in which the Eligible Entity plans to utilize BEAD funding, Digital Equity Act funding and/or other funding streams in concert to remedy inequities and barriers to inclusion. Accordingly, the Five-Year Action Plan should set forth a vision for digital equity, include the results of a needs assessment for underrepresented communities and an asset inventory of ongoing digital equity activities, and detail holistic strategies around affordability, devices, digital skills, technical support, and digital navigation. This requirement may be satisfied by the completion of a State Digital Equity Plan under the Digital Equity Act.[7] Please refer to the Digital Equity Act State Planning Grant Program NOFO for the requirements and deadlines applicable to that program.

[7] It is anticipated that each Eligible Entity participating in the BEAD Program will concurrently participate in the Digital Equity Program, which is the subject of a separate Notice of Funding Opportunity. Eligible Entities should consider the minimum content requirements of the State Digital Equity Plan listed in the State Digital Equity Planning Grants NOFO as the minimum content required here. Eligible Entities that do not participate in the Digital Equity Program should refer to the State Digital Equity Planning Grants NOFO for additional information.

12. Detail alignment of the Five-Year Action Plan with other existing and planned economic development, telehealth, workforce development, related connectivity efforts, and other Eligible Entity priorities.
13. Describe technical assistance and additional capacity needed for successful implementation of the BEAD Program.