



Pandemic Recovery Office

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Director

American Rescue Plan Act Coronavirus Capital Projects Fund GRANT PLAN

BROADBAND INFRASTRUCTURE PROJECTS PROGRAM PLAN

PROGRAM SUMMARY

In 2010, Rhode Island made a big bet on broadband access--using American Recovery and Reinvestment Act funds, as well as \$10M in state and local matching funds--to create a nationally enviable broadband fiber backbone that extends throughout the state. A decade later, more than 125 community anchor institutions (from schools to hospitals to nonprofits to state agencies) leverage that network for affordable, reliable internet. But that's where it stopped. Even as Rhode Island is one of the most connected states in the country, affordable, accessible "last-mile" internet access to critical areas in our state is lacking-- especially in the state's urban core and on its islands. This leaves too many Rhode Island residents behind and prevents the state's business sector from realizing its full potential of innovation and entrepreneurship.

According to a recent analysis of 317,866 speed tests taken in state over twelve months (August 2021 – July 2022), 37% of Rhode Islanders do not experience average speeds over 100/20Mbps. By leveraging our small size and current level of infrastructure, and braiding funding streams to maximize impact, Rhode Island aims to provide access to networks with 100/100Mbps or, at minimum, 100/20Mbps scalable to 100/100Mbps for everyone in the state by 2027.

Rhode Island has set the following goal:

Leverage a best-in-class, resilient, sustainable, and scalable broadband infrastructure to propel the state's 21st century economics, education, healthcare, civic and social engagement, and quality of life, by ensuring all Rhode Islanders have access to affordable, accessible, reliable high-speed internet in their homes, at their places of employment, and at public facilities by 2027.

To reach this goal, Rhode Island is proposing to leverage Coronavirus Capital Projects Fund (CPF) dollars to directly support broadband infrastructure projects across the state through the ConnectRI Broadband Deployment Program. Specifically, Rhode Island Commerce will use CPF funding to do two things:

- 1) Improve speed, resilience, and latency of current last-mile networks to ensure these networks can support 100/100Mbps average real speeds for all users. If it is determined to be impracticable for a project to deliver services at 100/100Mbps due to geography, topography, or excessive cost, the proposed project must be designed so that it reliably meets or exceeds 100/20Mbps and is scalable to a minimum of 100/100Mbps.
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- 2) Provide affordable broadband access to all homes and businesses connected through CPF-funded projects. To do so, when reviewing CPF-funded projects, the State will consider whether the broadband service options offered will be affordable to their target markets in the proposed service area and ensure that the service provider for CPF-funded projects participate in federal programs that provide subsidies on broadband internet access services to low-income consumers.

The projects will directly support opportunities for Rhode Islanders to use broadband services for work, education, and health monitoring. All projects will be designed to address a critical need of the community that the project will serve.

The State's goal is to couple these funds and efforts with Broadband Equity, Access, and Deployment (BEAD)-funded efforts to provide access to affordable, high-speed internet for all Rhode Islanders through the ConnectRI/Broadband Deployment Program. Rhode Island recognizes that CPF funds are part of a suite of tools that we need to use to support broadband infrastructure, enhanced access, and digital equity in states. Rhode Island is in the planning process for its State Digital Equity Plan (SDEP) and the Broadband Equity, Access, and Deployment (BEAD) program. CPF funds will be used to complement any funding received through BEAD and SDEP to support the goals identified by the State. By connecting all these efforts, we can ensure that CPF funds are not used in duplicative but rather additive ways.

The ConnectRI Last-Mile Grant Program

Rhode Island does not have a pre-existing last-mile broadband infrastructure program. The ConnectRI Last-Mile Grant Program will develop a targeted last-mile competitive grant program with combined funding from the Capital Projects Fund (CPF) and the BEAD program.

The program will deploy grants in three rounds, allowing the State to focus on targeted populations (whether demographic or geographic) in each of the rounds—and to update those priorities based on continued stakeholder engagement and updated mapping information as grants are administered, and access and affordability are increased. Given current feedback from stakeholders, priority groups for the first round of funding may include K-12 students, residents of publicly assisted housing, and/or older adults. There is additional desire from stakeholders to focus on the state's islands.

Prior to each round, Rhode Island Commerce will host office hours and provide targeted technical assistance to those in the round's targeted geographies/demographic groups to best prepare these groups before any application portal opens (once that happens, Rhode Island Commerce will follow standard protocols and only communicate to would-be applicants through official and public channels). This will include:

- Data mapping and analysis support to determine true need
- Cost analysis of various solutions
- Technology comparisons and network architecture models and best practices
- State broadband policy and local permitting assistance, and
- Program timeline and processes support.

All subgrant information, including subgrant application announcements, subgrant applications, requests for proposals, subrecipient scoring rubrics, subaward grant agreements, and outreach operational plans will be shared with Treasury.

Though we will prioritize the use of fiber whenever possible, there will be multiple technology interventions utilized for this initiative; each will be leveraged according to the use-case or demographic vertical we are looking to support, the currently available middle mile network in the area, and the geographic topography of the zone. Cost will be considered in all solution deployments as well.

The grant program will adhere to the following principles:

- Equity is and will remain a core and foundational principle for any state broadband initiative.
- To address affordability as a barrier to broadband adoption, Rhode Island will consider whether broadband service options offered by program recipients will be affordable to their target markets in the proposed service area. Determination of thresholds for affordability will be made during the promulgation of rules and regulations for the program.
- Participating service providers will be required to participate in the Affordable Connectivity Program
- Rhode Island must maximize the effectiveness of efforts by leveraging funds from multiple sources— federal/state/public as well as private match.
- Whenever possible, work should leverage public-private partnerships, with funding match requirements for private-sector partners.
- Deployments must have the ability to support multiple constituent groups and/or serve multiple use cases
- Deployments will be evaluated based on the “real” speeds provided, not just the advertised speeds. Ookla speed test data will be used to measure on average end-user experienced speeds.
- Resilience and sustainability are top tier needs. This work will ensure all assets are built resilient for the duration of their usable life. This includes resiliency from climate change and other environmental stressors as well as cyber-security and human-born network stressors. Assets must be viable for use or repurpose for at least 15 years.

All efforts undertaken in service of the State Broadband Goal will be based on clear data.

PROGRAM TIMELINE AND MILESTONES

YEAR	MILESTONES	NOTES
2022	<p>Q3</p> <ul style="list-style-type: none"> • Convene first Rhode Island Broadband Advisory Committee meeting (quarterly thereafter) • Release RFI to support design of CPF-funded grant program <p>Q4</p> <ul style="list-style-type: none"> • Establish Rules and Regulations for the ConnectRI Last-Mile Grant Program • Create challenge process for the Last-Mile Grant Program • Submit quarterly project and expenditure report to Treasury 	<p>* Advisory Committee to support selection of awardees as well as determinations of focus areas for each grant round</p> <p>** Seeking to work with NTIA and UST on creation of program allowing RI to use CPF as BEAD match</p>
2023	<p>Q1</p> <ul style="list-style-type: none"> • Make determinations on targeted populations (demographics/geographies) for Grant Program Round 1 • Launch Round 1 program application • Submit quarterly project and expenditure report to Treasury <p>Q2</p> <ul style="list-style-type: none"> • Round 1 program application closes • Submit quarterly project and expenditure report to Treasury <p>Q3</p> <ul style="list-style-type: none"> • Round 1 selections made • Round 1 environmental analyses, etc. completed; agreements executed • Make determinations on targeted populations (demographics/geographies) for Grant Program Round 2 • Submit quarterly project and expenditure report to Treasury • Submit annual performance report to Treasury <p>Q4</p> <p>Round 1 projects begin</p>	<p>* Round 1 will be smaller (pilot round) targeting area(s) of most pressing need</p> <p>*Round 2 program application launched in conjunct with initial BEAD implementation funding release</p>

YEAR	MILESTONES	NOTES
	Launch Round 2 program application Submit quarterly project and expenditure report to Treasury	
2024	<p>Q1 Round 2 program application closes Submit quarterly project and expenditure report to Treasury</p> <p>Q2 Round 1 initial status reports due; analysis of project efficacy complete Round 2 selections made Round 2 environmental analyses, etc. completed; agreements executed Submit quarterly project and expenditure report to Treasury</p> <p>Q3 Round 2 projects begin Launch Round 3 program application Submit quarterly project and expenditure report to Treasury Submit annual performance report to Treasury</p> <p>Q4 Round 1 first annual report complete Analysis of coverage of currently funded projects; selection of Round 3 targeted area(s) Round 3 program application closes Submit quarterly project and expenditure report to Treasury</p>	
2025	<p>Q1 Round 2 projects mid-year reporting Round 3 selections made Round 3 environmental analyses, etc. completed; agreements executed Submit quarterly project and expenditure report to Treasury</p> <p>Q2 Round 3 projects begin</p>	<p>* CPF funding allocated through FY25 only in State budget</p> <p>*Round 3 projects to be smaller in scope to account for CPF dates for completion of spend</p>

YEAR	MILESTONES	NOTES
	<p>Submit quarterly project and expenditure report to Treasury</p> <p>Q3 Round 2 projects one-year reporting Submit quarterly project and expenditure report to Treasury Submit annual performance report to Treasury</p> <p>Q4 Round 1 projects complete Round 3 projects mid-year report Submit quarterly project and expenditure report to Treasury</p>	
2026	<p>Q1 Submit quarterly project and expenditure report to Treasury</p> <p>Q2 Round 3 one-year project reporting Submit quarterly project and expenditure report to Treasury</p> <p>Q3 Round 2 projects complete Submit quarterly project and expenditure report to Treasury Submit annual performance report to Treasury</p> <p>Q4 Round 3 projects complete All spending complete All project operational Submit quarterly project and expenditure report to Treasury</p>	
2027	<p><u>Q4</u> CPF final reporting</p>	

PROGRAM WEBSITE, GUIDANCE DOCUMENTS, AND RULES

Website:

- Landing page: <https://commerceri.com/broadband>
- Speed test data collection: <https://commerceri.com/speedtest/>

Enabling statute:

- FY 2023 Budget Article 1 – Establishes the use of \$25 million of Capital Projects Funds for broadband infrastructure
- FY 2023 Budget Article 9 – Establishes the State Broadband Development Program, inclusive of the administration of last-mile competitive sub-grants on behalf of Rhode Island Commerce and the State of Rhode Island and leading digital equity efforts for the state. Project structure is intentionally designed to integrate broadband and digital equity goals with statewide priorities on civic engagement, climate change, economic and workforce development, education, focus industry growth, health, housing, public-private partnerships, and transportation.
- Full budget article 9 here: <http://webserver.rilegislature.gov/billtext22/housetext22/article-009-sub-a.pdf>

Rhode Island Commerce will promulgate rules and regulations for this grant program in line with state rules promulgation processes as well as both Capital Projects Fund and BEAD requirements.

ELIGIBILITY

Critical Need: The COVID-19 public health emergency highlighted that access to high-quality internet can enable work, education, and health access, and revealed that individuals and communities that lack affordable access to such high-quality internet are at a marked disadvantage. Rhode Island will prioritize investment in broadband for communities sensitive to or that have historically experienced inequities to improve digital equity and opportunity, especially in the case of communities that currently lack access to the affordable, reliable, high-quality broadband internet that is necessary for full participation in school, healthcare, employment, social services, government programs, and civic life. In addition, because affordability of broadband is necessary to directly enable its use, when selecting projects for support, Rhode Island will consider whether the broadband service options offered by recipients of grant funding will be affordable to their target markets in the proposed service area. As examples, Rhode Island Commerce will prioritize deployments that support groups including K-12 students, older adults, and those living in publicly assisted housing, which are three target demographics highlighted during roundtable discussions hosted by Rhode Island Commerce as part of their community engagement process described below.

Community Engagement and Equity: Equity is at the core of the work Rhode Island Commerce is doing for broadband infrastructure and investment in Rhode Island. Rhode Island has chosen to combine broadband and digital equity in one office to ensure these two important efforts are well integrated and that digital literacy and digital equity is not an afterthought with broadband infrastructure. As we design the CPF-funded broadband infrastructure program, we will leverage the Digital Equity Act Planning Grant process and the community and stakeholder engagement driven through that effort to ensure voices of Covered Populations (as defined by the Digital Equity Act as inclusive of “low income, elderly, incarcerated, veterans, language learners, racial and ethnic minorities, rural residents”) are included in the design of this grant program and that the outcomes of the program serve their needs. This structure ensures collaboration at every step of the process with community, local, and regional stakeholders, with strong emphasis on Covered Populations stakeholders.

Rhode Island Commerce has been formally working to build and strengthen statewide broadband maps since the beginning of 2022. These maps include data layers that inform this program plan, including:

- 1) E911 Data: Data mapping household locations in state, so we can overlay location of homes against location of infrastructure, including fiber infrastructure.
- 2) Location data for our state’s publicly assisted housing units, K-12 schools, community anchor institutions such as multipurpose community facilities, and small businesses, made available through various datasets accessible to the state.
- 3) Ookla speed test data: Data showcasing the real speeds experienced by end-users in state, aggregated, presently, at the Census Block level to ensure statistical significance. As more data are available, we will further granularize these analyses.
 - This is overlaid with FCC Form 477 data to understand reported and experienced accessibility.

- 4) American Community Survey data: We have specifically used ACS data to understand the number of unconnected households in RI as well as those that lack internet-connected devices. This is in-line with the way these data are used in the NTIA's Indicators of Broadband Need map.

Additionally, Rhode Island Commerce recently launched a statewide broadband access survey to gather further information about the real speeds, cost, and satisfaction that Rhode Islanders have with their present internet service. Rhode Island Commerce will continue to gather data and information to further hone and target the use of these funds within ConnectRI, the greater broadband deployment program.

Finally, Rhode Island Commerce has hosted a series of roundtable discussions and focus groups with various constituencies and stakeholders around broadband needs, principles Rhode Island Commerce needs to adhere to when deploying federal funds for broadband, and priorities for use of these funds. Thus far, these stakeholders include municipal leaders, municipal technology and economic development directors, representatives from public housing authorities and low-income housing developers, K-12 school district leaders and IT directors, representatives of state agencies, internet service providers, nonprofits that support Covered Populations, and those engaged with incarcerated residents. Leveraging this existing interagency, stakeholder, and engagement infrastructure, Rhode Island Commerce will empower those with lived experience facing barriers to digital equity by supporting opportunities to participate in decision making for future funding, and to refine Rhode Island's goals, principles, priorities, and strategies for digital equity.

As detailed below, RI Commerce also plans to leverage a first-in-the-nation effort called Health Equity Zones (HEZ) to engage community members to shape ConnectRI programming. Health Equity Zones are community-based collaborative infrastructure established by the Rhode Island Department of Health (RIDOH) in 2015. Health Equity Zones are an innovative, place-based approach that brings people together to build healthy, resilient communities across our state. The model encourages and equips the whole community to collaborate to create healthy places for people to live, learn, work, shop, socialize and play. With 80% of health outcomes being determined in the communities where members live, it is essential to create meaningful connections between the ConnectRI and the Health Equity Zones

Program design to avoid duplication: Thus far, Rhode Island has not dedicated any of its Coronavirus Aid, Relief, and Economic Security (CARES) Act funding nor its State Fiscal Recovery Fund (SFRF) funding toward broadband infrastructure efforts. However, in preparation for the BEAD program as well as the funding made available through CPF, the State did allocate \$500,000 in SFRF funds in FY 2022 toward broadband planning, mapping, and staffing.

The CPF funding being proposed for last-mile work in Rhode Island will be used as a match for funds appropriated through the National Telecommunications and Information Administration's (NTIA's) BEAD program. By braiding these funds and directly linking the projects to both funding streams, Rhode Island Commerce can ensure it is not duplicating investments.

The budget provided reflects CPF requested funds only. However, Rhode Island Commerce has created a program budget reflective of CPF funding, BEAD funding, and Digital Equity Act funding collectively to strategically divide costs of our holistic broadband efforts across all three tranches of money and the best-fit use for each. This larger budget is presently in draft stage, as BEAD funding has not yet been approved, but can be shared as reference upon request.

PROGRAM ADMINISTRATION

Compliance: Rhode Island Commerce has a history of managing federal grant funds dispersed through many agencies. Rhode Island Commerce was previously audited by the federal Economic Development Agency for grant compliance and was found to have clean and appropriate compliance and financial management structures.

Rhode Island Commerce creates separate bank accounts for each federally funded program as well as a guiding Policies and Procedures (P&P) Manual. Rhode Island Commerce follows its generally established procurement rules, including competitive bid processing, and Rhode Island Commerce follows state accounting policies. Its procurement and accounts payables processes adhere to the general principles, policies and practices set forth in the State Purchases Act. Grant and administration payments are normally distributed through Rhode Island Commerce's procurement and accounts payable processes, outlined in its Purchasing Rules and the Cash Disbursements section of the Accounting Policy Manual (available upon request).

Rhode Island Commerce adheres to state record retention policies, following the retention schedules promulgated by the Office of the Secretary of State of Rhode Island (see the Records Management portal - <https://www.sos.ri.gov/divisions/frequent-filers/records-management>). When federal law requires longer records retention, those supersede state law.

Rhode Island Commerce has a robust internal compliance and reporting process to ensure its compliance as well as a system for tracking all subrecipients and their reporting requirements. The Grant Project Manager & Senior Grants Administrator work in conjunction with the Contracts & Accounting Manager to ensure regular financial reconciliation of the award happens throughout the duration of the period of performance and the Grant Project Manager and Senior Grants Administrator coordinate and manage all subrecipient project metrics and reporting. Rhode Island Commerce is responsible for monitoring its activities under federal awards to assure compliance with applicable federal requirements and to ensure performance expectations are being achieved. Ongoing monitoring occurs as part of normal operations. It includes regular management and supervisory activities and is part of the internal control structure for the entire organization. Any discrepancies detected or discovered are immediately corrected and processes or systems are put into place to ensure such discrepancies or deficiencies do not occur again. The Grant Project Manager ensures compliance with performance expectations and reviews and approves the associated expenditures as compared to the budget. The Grant Project Manager along with the Senior Grants Administrator will manage subrecipient progress and final reporting. The reporting will entail narrative response questions to ensure the metrics aligned within the period of performance of the grant are achieved.

Since 2020, Rhode Island Commerce has processed almost \$90 million in CARES Act and/or American Rescue Plan Act (ARPA) funding. Rhode Island Commerce is managed by a robust leadership team and receives direct oversight from both the Executive Office of Commerce and the Rhode Island Commerce Board of Directors. Rhode Island Commerce's financial team consists of a Chief Financial Officer, two accountants, and a contracts and accounting manager.

Rhode Island Commerce's broadband program team comprises a Director of Broadband Strategy, a Broadband Mapping Analyst, a Grants Administrator (part-time), and a Director of Operations and Special Projects (part-time). As CPF funds are awarded, the Rhode Island Commerce will add a grants administrator to this group as well as a project manager and stakeholder engagement/communications manager. These will be further supported by BEAD funding from the NTIA, ensuring sustainability of the roles throughout the duration of the CPF-funded projects. More information on staffing can be found in the program budget below.

Community Engagement and Participation: Rhode Island created an official Broadband Deployment Program through the State's FY 2023 budget. This Program will:

- Establish a nine-member advisory committee, to include representation from the Boys and Girls Club as well as a member of the unserved or underserved community in Rhode Island. This committee has been established through the FY23 budget statute.
- Leverage an already created informal working group to engage public housing authorities, low-income housing developers, older adults and their support partners, school districts and student and parent groups, and more.
- Leverage a first-in-the-nation model known as Health Equity Zones to further engage community members to shape ConnectRI programming, as described above.

Conduct statewide surveys of need, host focus groups, ensure accessibility language is translated into relevant languages, and link infrastructure projects to digital equity efforts.

PROGRAM BUDGET

	2022	2023	2024	2025	2026	Total
2a. Administering the CPF funds (by the Recipient)	\$0	\$69,727	\$200,000	\$250,000	\$19,773	\$539,550
2b. Technical assistance to potential subrecipients	\$25,000	\$50,000	\$50,000	\$40,000	\$0	\$165,000
2c. Complying with grant administration and audit requirement	\$20,000	\$50,000	\$50,000	\$40,000	\$40,000	\$200,000
2d. Community Engagement	\$50,000	\$100,000	\$100,000	\$30,000	\$10,000	\$290,000
2e. State Single Federal Audit Fee	\$4,615	\$1,548	\$1,324	\$0	\$0	\$7,487
Total Program Administration	\$99,615	\$271,275	\$401,324	\$360,000	\$69,773	\$1,201,987
	2022	2023	2024	2025	2026	Total
3a. Mapping for Project Selection and Data Support	\$0	\$400,000	\$250,000	\$200,000	\$150,000	\$1,000,000
3b. Project Direct Supports (e.g., environmental and engineering reviews, contracting and vendor engagements, business model sustainability)	\$0	\$350,000	\$300,000	\$275,000	\$100,000	\$1,025,000
3c. Sub-Grants	\$0	\$13,000,000	\$4,200,000	\$4,000,000	\$529,513	\$21,792,513