



**ConnectLA**

Louisiana Office of Broadband  
Development & Connectivity



# **BEAD FINAL PROPOSAL**

# Message from the Executive Director

*“Telehealth, telework and online classes demand broadband expansion. As Governor, I will make sure Louisianans without broadband access receive the same educational and work opportunities that those with high-speed internet already enjoy.” – Governor Jeff Landry*

It is with the stated mission above that ConnectLA is thrilled to be the first state in the country to announce provisional awards for the Broadband Equity, Access, and Deployment program. Starting today and over the next couple of weeks, we would strongly encourage you to provide feedback on our draft final proposal.

Since the beginning of the year, we have been thoughtful to ensure that we create a program that balances first and foremost the needs of people (especially those who live in rural parts of the state) with creating a free market framework that encourages a high level of competition from internet service providers in the state and out of state and the results of this framework speak for themselves. In addition, given the size of our BEAD allocation (8th largest in the country and 10th largest on a per capita basis), if we worked with ruthless efficiency, we strongly felt that we could have enough non-deployment funds to make a substantive dent in areas like education, workforce development, economic development and in healthcare.

On the deployment side, the headlines are as follows:

- Nearly 95% of the approximately 140,000 BEAD-eligible locations will receive Fiber optic connectivity.
- Maintaining all of the above technology offerings allowed us to ensure universal coverage. We firmly believe in the technology advancements and innovative evolution of fixed wireless and LEO providers.
- Over 90% of the fiber plant will be buried underground to ensure infrastructure integrity and over 30 mobile towers will be built to ensure overall telecommunications resilience.
- Most importantly, approximately 70% of the deployment funds will go to companies based in Louisiana.

The quote from the Governor couldn't have better captured the importance of how having broadband access is foundational to our state's societal well-being. He challenged us often over the years that develop the best set of programmatic non-deployment plans to ensure we create education-to-employment pathways starting as young as Kindergarten through a 2–4-year credentialed degree. In addition, addressing our healthcare challenges has been paramount, especially given the acute healthcare challenges we face in maternal, behavioral health, and chronic diseases. Lastly, ensuring that our critical infrastructure is mapped will ensure that we minimize disruption of underground infrastructure.

As a result, we are pleased to announce that over \$500 Million in non-deployments funds will be invested in the following (key highlights):

- Louisiana Department of Health will make the state's largest investment in expanding rural healthcare access.
- Louisiana Workforce Commission will develop the country's most unique workforce effort focused on outcomes.
- The Louisiana Department of Education will implement the most robust virtual learning and virtual tutoring effort in the country.
- Louisiana Economic Development will roll out the nation's most ambitious small program focused on helping small businesses and those that are part of our legacy industries get ready for a digital economy.

We are quite optimistic that these game-changing efforts (once executed) will change the landscape of Louisiana for generations to come.

We look forward to hearing your feedback. If you have any questions or need clarification about anything in this document, contact us at [connect@la.gov](mailto:connect@la.gov)



Veneeth Iyengar, Executive Director

**Note:** This document is intended solely to assist recipients in better understanding BEAD Initial Proposal and the requirements set forth in the Notice of Funding Opportunity for this program. This document is not intended to supersede, modify or otherwise alter applicable statutory or regulatory requirements or the specific application requirements set forth in the NOFO. In all cases, statutory and regulatory mandates, and the requirements set forth in the NOFO, shall prevail over any inconsistencies contained in this document.

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### Version History

Version	Date	Changes
1.0	11/18/2024	Draft version released for public comment

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## Acronyms

Acronym	Definition
BABA	Build America, Buy America Act
BEAD	Broadband Equity, Access, and Deployment
ConnectLA	Louisiana Office of Broadband Development & Connectivity
DCRT	Louisiana Department of Culture, Recreation & Tourism
Gbps	Gigabits per second
GUMBO	Granting Unserved Municipalities Broadband Opportunities
IIJA	Infrastructure Investment and Jobs Act
ISP	Internet Service Provider
LAPDD	Louisiana Association of Planning and Development Districts
LCTCS	Louisiana Community and Technical College System
LBOR	Louisiana Board of Regents
LDH	Louisiana Department of Health
LDOA	Louisiana Division of Administration
LDOE	Louisiana Department of Education
LDPS&C	Louisiana Department of Public Safety & Correct
LED	Louisiana Economic Development
LOUIS	Louisiana Library Network
LSU AgCenter	Louisiana State University Agricultural Center
LWC	Louisiana Workforce Commission
MBE	Minority-owned Business Enterprises
Mbps	Megabits per second
NOFO	Notice of Funding Opportunity
NTIA	National Telecommunications and Information Administration
ULL	University of Louisiana Lafayette
WBE	Women-owned Business Enterprises

## Section 1 Subgrantee Selection Process Outcomes (Requirement 1)

### 1.1 Supporting Documentation for Subgrantees

**Complete and submit the Subgrantees CSV file (named “*fp\_subgrantees.csv*”) using the NTIA template provided.**

See Exhibit A.

### 1.2 Supporting Documentation for Deployment Projects

**Complete and submit the Deployment Projects CSV file (named “*fp\_deployment\_projects.csv*”) using the NTIA template provided.**

See Exhibit B.

### 1.3 Supporting Documentation for Locations

**Complete and submit the Locations CSV file (named “*fp\_locations.csv*”) using the NTIA template provided. The list must match the approved final list from the Eligible Entity’s Challenge Process results.**

See Exhibit C.

### 1.4 Supporting Documentation

**Does the Eligible Entity intend to use BEAD funds to serve CAIs?**

Yes.

### 1.5 Supporting Documentation

**Complete and submit the CAIs CSV file (named “*fp\_cai.csv*”) using the NTIA template provided. Although CAIs are not included under (f)(1) deployment projects, to confirm the Eligible Entity’s compliance with the BEAD prioritization framework and identify BEAD-funded CAIs, the NTIA template is required. This list must match the approved final list from the Eligible Entity’s Challenge Process results.**

See Exhibit D.

### 1.6 Consistency with Initial Proposal Volume II

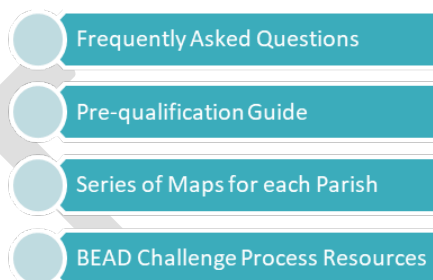
**Describe how the Eligible Entity’s deployment Subgrantee Selection Process undertaken is consistent with that approved by NTIA in Volume II of the Initial Proposal.**

Louisiana’s GUMBO 2.0 plan for awarding BEAD subgrants contained multiple elements designed to achieve a fair, open, and highly competitive award process with broad participation both by current in-state broadband providers as well as by qualified new providers, consistent with the approved Initial Proposal Volume II (IPv2).

GUMBO 2.0 used an overall approach of organizing the eligible locations in the state into a set of pre-defined areas, or “sub-project areas.” Prospective subgrantees in Louisiana had wide flexibility to define their proposed overall deployment projects, but proposals were submitted in the form of sets of SPAs. By including an SPA in an application, the provider committed to reach all included eligible locations. GUMBO

2.0 used this SPA-based approach to ensure that the award of BEAD subgrants in Louisiana reaches all eligible locations as well as to ensure a fair, open, and competitive process. The use of standardized SPAs also allowed ConnectLA to make fair comparisons between different proposals that partially overlap; to foster competition between prospective subgrantees and therefore more reliably only award BEAD funds at the level required by a reasonable business case; and to still provide significant flexibility that will enable a wide range of providers, both small and large, to participate in the process, rather than using areas that favor only one specific entity or general type of provider.

ConnectLA developed a robust suite of informational materials and resources for those interested in applying for ConnectLA’s portion of BEAD funding, including frequently asked questions, a comprehensive pre-qualification guide, a series of maps for each parish, and resources surrounding the states BEAD challenge process. These resources are prominently featured on ConnectLA’s website and actively promoted at statewide stakeholder meetings.



Pre-qualification requirements were released to prospective subgrantees on March 14, 2024. Draft Sub-Project Areas were released on April 18, 2024, for solicitation of public comments through May 18, 2024. This information was provided via ConnectLA’s public website, with additional outreach via email and other forms of direct communication to both providers and other local stakeholders known to ConnectLA via past efforts including the GUMBO 1.0 process as well as BEAD Five-Year Action Plan local engagement efforts. ConnectLA reviewed and utilized comments received to assist in revisions before the release of final SPAs that will be used for GUMBO 2.0 on July 1, 2024, and reference funding to best achieve the goals of the BEAD program in LA, as provided in the approved Initial Proposal Volume II. At the time of this final release, the description of each SPA included a reference amount of BEAD funding for that SPA in Round 1 of the GUMBO 2.0 process. These reference funding levels were assigned using the per-location funding need values made available to Louisiana by NTIA; specifically, the state used the sum of the per-location “Greenfield FTTH NPV” values for eligible BSLs within an SPA as a default reference funding level and then will make certain adjustments if needed to ensure that as many SPAs as possible receive initial interest.

ConnectLA opened the GUMBO 2.0 pre-qualification window July 1, 2024, for two weeks, and closed July 14, 2024. Notice was given via announcement on the ConnectLA public website, with additional outreach as described above. During this filing window, prospective subgrantees provided BEAD-required financial, operational, managerial and technical qualifications as well as submitted required certifications and authorization. The pre-qualification review process began September 14, 2024, which included RFI letters sent out to prospective subgrantees, RFI questions and answers, and application revisions. The review process concluded, and all prospective applicants were notified on August 9, 2024, whether their submissions were approved or disqualified to participate in GUMBO 2.0, after a thorough review by the ConnectLA team. The pre-qualification evaluation process from start to finish lasted 39 days.

Round 1 application window for the GUMBO 2.0 program opened August 15, 2024, for qualified prospective subgrantees, and closed August 28, 2024. Round 1 applications included the list of SPAs included in the application, the amount of BEAD funds requested, the proposed technology type for the project and additional primary and secondary scoring application elements including plans for

affordability, fair labor practices, deployment timeline, speed of network and any other supporting information required to comply with final NTIA rule requirements for the fixed subaward grant model that ConnectLA will use for GUMBO 2.0. ConnectLA did not specify an Extremely High-Cost Per Location Threshold cost level in advance of Round 1, as the state strongly encouraged the broad participation of non-FTTH technologies and providers in BEAD 2.0 given the diverse range of needs throughout the state. Round 1 applications were analyzed to identify any overlap between applications, with a limited number of selections made according to the prioritization approach described in the approved IPv2 section 2.4.2. After Round 1, no information was provided to prospective subgrantees in order to maximize competition and minimize the risks of indirect collusion and coordination between applicants in Round 2.

Round 2 applications for the GUMBO 2.0 program opened September 11, 2024, and closed September 25, 2024. In Round 2, all remaining unawarded Round 1 applications were automatically pulled forward and not eligible to be withdrawn. Round 1 applications were simply left as-is for Round 2, or the applicant made certain changes including adding new SPAs to the application and/or changing the amount of BEAD funding requested. Any Round 1 applicant could also propose new Round 2 applications exclusively comprising SPAs that did not receive any applications in Round 1.

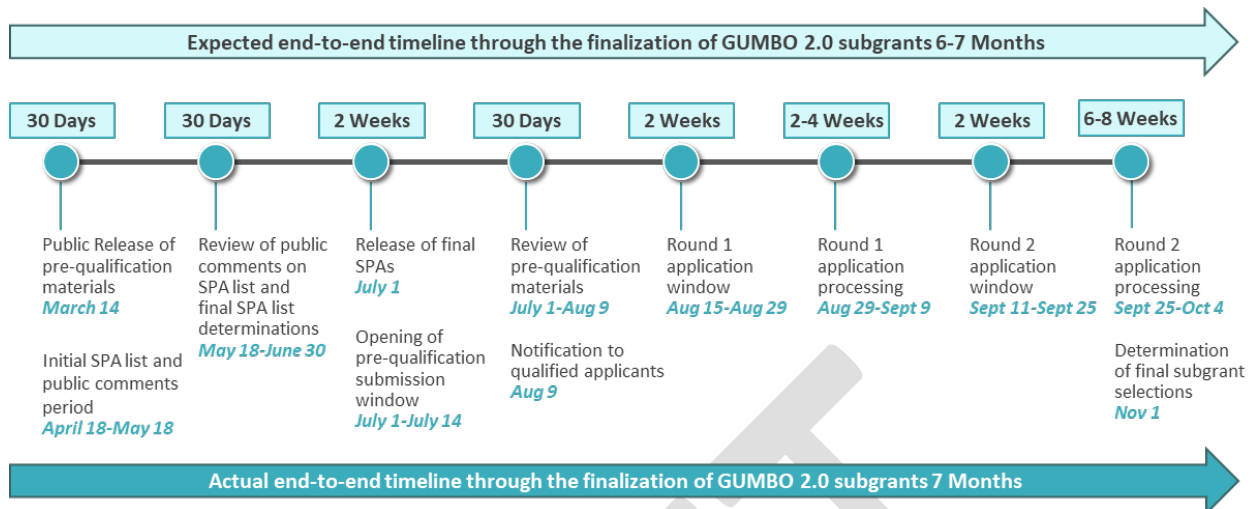
ConnectLA designed this two-round approach to reach 100% of eligible locations via a single subgrant process and to ensure that all eligible locations attract high-quality subgrant proposals that all can be funded within the total BEAD budget. The purpose of Round 2 in GUMBO 2.0 was to advance two inter-related objectives: (1) to establish a “best and final offer” mechanism by which the competition for overlapping applications in Round 1 can result in more efficient BEAD funding awards by the state in those high-demand areas; and (2) to provide a “second bite at the apple” with greater funding availability for any areas passed over in Round 1 if providers initially view the Round 1 reference funding as insufficient.

After finalizing all the Round 1 and Round 2 selections, ConnectLA reviewed the overall set of awards that could be made based on these steps to assess whether 100% of unserved locations would be served by either Priority or Reliable service within the available BEAD allocation budget for the state. ConnectLA then engaged in direct negotiations with existing providers and/or entities receiving subgrants in nearby areas about potential expansion to encompass these remaining unserved locations. As a tool in engaging in these negotiations, ConnectLA used the NTIA provided per-location NPV and Total Investment data as a reference for assessing the reasonableness of proposed terms for expanding coverage. In these situations, ConnectLA will also prioritize the use of any unawarded BEAD funds, such as by potentially agreeing to funding levels above the minimum 25% match requirement.

ConnectLA conducted a final review of selected proposals to confirm that the total set of awards to each prospective subgrantee is consistent with the financial, operational and managerial capabilities submitted in the pre-qualification process, confidentially engaging with specific providers if needed to confirm or clarify any identified issues, and reserving the ability, if necessary, to select an alternative proposal if any concerns about the ability of the provider to deliver on all awards remain.

ConnectLA’s subgrantee selection process sequence of events and timeline remained consistent with the approved IPv2. ConnectLA’s expected end-to-end timeline through the finalization of GUMBO 2.0 subgrants was approximately 6-7 months and the actual end-to-end timeline was 7 months. The overall sequence of events and timeline are summarized below:





## 1.7 Fair, Open, and Competitive Process

**Describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.**

***Fairness.*** Gumbo 2.0 included a broad set of safeguards to ensure a fair subgrantee selection process that is free of conflicts of interest (COI), direct or indirect collusion amongst applicants and biased or otherwise arbitrary outcomes.

First, as a fundamental requirement under Louisiana law as applicable to GUMBO 2.0, applicants must fully disclose any real or apparent (perceived) COIs. In addition to these generally applicable Louisiana requirements, GUMBO 2.0 required attestation from prospective subgrantees included the acceptance of these terms. Such a conflict would arise when the “employee, any member of his (her) immediate family, his or her partner...has a financial or other interest in the firm selected for award” (2 CFR 200.318). In addition to requiring such attestation from applicants, ConnectLA also required state employees and consultants involved in the evaluation of subgrant applications to disclose any financial or other interest in any applicant entity and did not allow any employees with such interest to participate in the selection of GUMBO 2.0 subgrants. Other federal regulations with which the grantee must comply are the conflict-of-interest requirements in 2 CFR 200.112 and 24 CFR 570.489(h).

Based on these disclosures, ConnectLA reserved the right to take any appropriate mitigation steps including, if necessary, the disqualification of the entity from GUMBO 2.0. Second, Louisiana law prohibits direct collusion between bidders or applicants for state-provided funds; these rules directly apply to GUMBO 2.0. In addition, GUMBO 2.0 implemented several new requirements designed to mitigate the risks of indirect collusion between applicants in the form of public communication about desired service areas, funding requests, or other information that could lead to anti-competitive signaling behavior or other forms of coordination by applicants.

At the commencement of the GUMBO 2.0 pre-qualification process, for example, prospective subgrantees must certify that they will refrain from making any public communication with respect to plans for applying for specific GUMBO 2.0 subgrants, until the announcement of final awards, using rules modeled after the Federal Communications Commission’s (FCC) prohibited communications rules for auctions. A

number of Louisiana providers participated in GUMBO 2.0 also participated in the FCC's 2020 RDOF process and therefore are well-acquainted with these rules. In addition, all prospective subgrantees also will agree to adhere to the specific GUMBO 2.0 rule prohibiting any prospective subgrantee from publicly disclosing that it has received an award until after ConnectLA announces the end of GUMBO 2.0 after Round 2. This prohibition specifically applies to any prospective subgrantees confidentially notified of a Round 1 award, and failure to comply with this rule shall result in the disqualification of any remaining Round 2 applications.

ConnectLA emphasized transparency prior to the beginning of the subgrantee selection process. Only limited information was made available to prospective subgrantees with respect to competing applications' proposed project areas, funding requests, technology types, or other selection criteria. As a reinforcing element for these COI and anti-collusion protections, the detailed ownership disclosure requirements allowed ConnectLA to police any attempts to disguise COIs or collusive behavior via the use of shell companies, indirect ownership agreements or other avoidance strategies based on interlocking ownership structures.

GUMBO 2.0 guarded against bias or arbitrary outcomes via the use of transparent, objective criteria, both for the definition of SPAs as well as for scoring and selecting winning subgrantees. For example, the GUMBO 2.0 scoring rubric is strongly weighted toward objective, quantitative metrics (including BEAD funding level, affordability, speed of deployment, local/tribal support, and speed of network for non-FTTH projects) that involve little or no qualitative scoring discretion (and therefore little risk of arbitrary outcomes). By state law, GUMBO 2.0 also included an appeals process for scoring errors as an additional protection against arbitrary outcomes.

***Openness.*** GUMBO 2.0 welcomed the participation of any type of provider authorized to provide broadband service in Louisiana, including for-profit entities, co-operatives and public-private partnerships as enabled by the Local Government Fair Competition Act since 2004. The GUMBO 2.0 scoring rubric did not favor any particular provider nor type of provider.

In addition, Gumbo 2.0 provided public notice and transparency for all program activities up until applications were submitted, at which time only limited information was available in order to prevent indirect collusion by applicants, and then followed by full transparency after awards were announced. For example, all detailed GUMBO 2.0 application requirements and scoring rules were made public well in advance of the application process. ConnectLA's initial definitions of SPAs also was made available prior to the start of the process and final SPA definitions as well as Round 1 reference BEAD funding availability levels were made public in advance. ConnectLA implemented a series of technical assistance and application tutorial steps for prospective subgrantees prior to the start of the process, including a BEAD Grant Application Platform Training and "mock GUMBO 2.0" opportunity for prospective subgrantees to fully familiarize themselves with the application process.

***Competitiveness.*** ConnectLA designed GUMBO 2.0 to emphasize the competitiveness of subgrant awards and thereby deliver the most impact for the citizens of Louisiana from the state's BEAD allocation. First, as described above, almost all of the scoring elements were not only based on neutral criteria but are algorithmic in nature, such as the award of points based on the percent of reference BEAD funding objectively determined by the state or the award of affordability points based on a reasonable reference

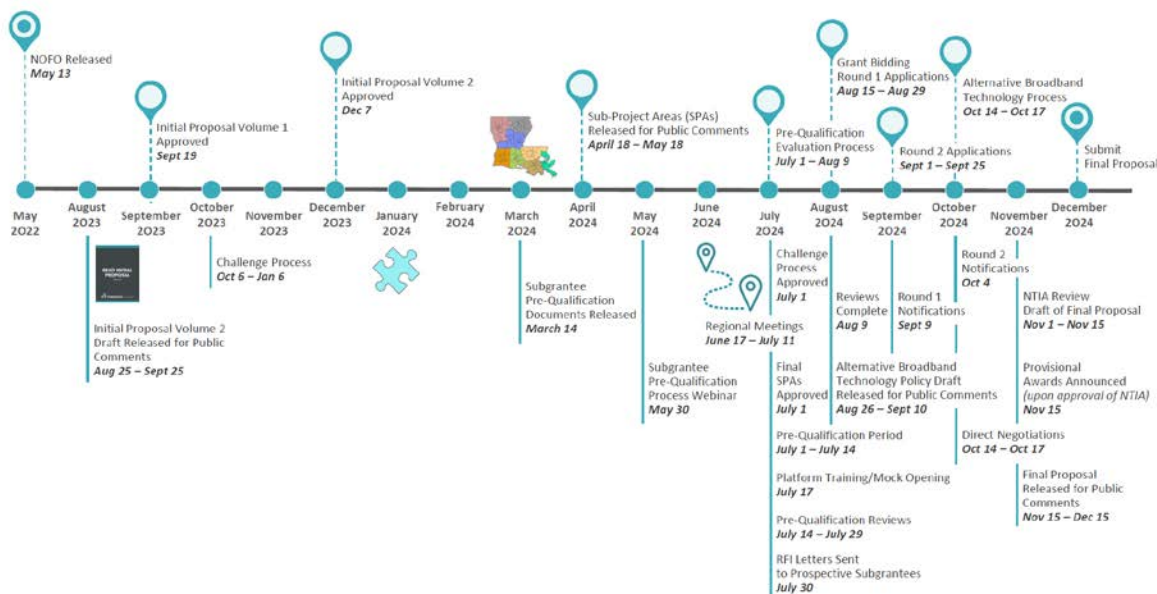
price. Even qualitative scoring components such as fair labor plans support flow from clear, neutral criteria was made public in advance of applications.

Above and beyond scoring rules, however, GUMBO 2.0’s fundamental structure heightened competition for BEAD subgrants. As detailed above, BEAD 2.0 allowed ConnectLA to make objective comparisons between applications based on standardized sub-project areas and objectively defined reference funding estimates. GUMBO 2.0 also employed a two round application process that both created incentives for applicants to apply in any area of interest in all Round 1 (because of the risk that another application will be automatically awarded in Round 1 if there was no overlapping application) and encouraged prospective subgrantees to make a best and final offer prior to awards after being notified of competing applications in desired areas, creating a concrete mechanism for the competitive dynamics promoted by GUMBO 2.0’s rules to result in a more efficient outlay of BEAD funds.

### 1.8 Information on Applications

**Describe the method and mechanism by which applications were solicited, including the number of solicitations released and rounds of applications accepted.**

ConnectLA had a comprehensive solicitation and engagement process that began in August 2023 with the release of the Initial Proposal Volume II. ConnectLA solicited multiple applicants via various channels such as [www.connect.la.gov](http://www.connect.la.gov), email newsletters, public regional meetings, and webinars. In addition, ConnectLA conducted live demonstrations and workshops on the application process and application portal as well as conducted an application demonstration round. This allowed potential applicants to ask questions and gain a deeper understanding of the application process thus soliciting qualified ISPs to participate in the application rounds.



The solicitations and rounds resulted and ensured a widespread provider participation in a fair, open and competitive subgrantee selection process.

BEAD Summary of Participation by Round

Applications	Round 1	Round 2	Direct Negotiation
Submitted	345	25	145
Withdrawn/Retracted	153	174	0
Carryforward	0	345	0
Preliminarily Selected	13	177	30
<b>Totals</b>	<b>511</b>	<b>721</b>	<b>175</b>

ISP Participation	Round 1	Round 2	Direct Negotiation
Unique ISPs	26	26	23
ISP Preliminarily Selected	2	18	13
<b>Total Unique Subgrantees</b>	<b>2</b>	<b>16</b>	<b>2</b>

1.9 Last-Mile Deployment Subgrantee Selection

For each round of (f)(1) last-mile deployment subgrantee selection, provide the Eligible Entity's completion date for each of the following steps:

A. Opening of application period or equivalent solicitation process.

Application Period	Date	Time
Pre-qualification Window Opened	July 1, 2024	12:00 PM CDT
Round 1 Window Opened	August 15, 2024	8:00 AM CDT
Round 2 Window Opened	September 11, 2024	8:00 AM CDT
Direct Negotiation Window Opened	October 14, 2024	8:00 AM CDT

B. Application (or equivalent) submission deadline.

Application Submission Deadline	Date	Time
Pre-qualification Window Closed	July 14, 2024	11:59 PM CDT
Round 1 Window Closed	August 29, 2024	7:59 AM CDT
Round 2 Window Closed	September 25, 2024	7:59 AM CDT
Direct Negotiation Window Closed	October 17, 2024	7:59 AM CDT

C. Completion of application (or equivalent) review.

Application Review	Date
Pre-qualification Initial Review Complete	July 30, 2024
Pre-qualification Request for Information (RFI) letters sent to applicants requesting additional information	July 30, 2024
Pre-qualification RFI letters due to ConnectLA	August 4, 2024
Round 1 Review Complete	September 9, 2024
Round 2 Review Complete	October 4, 2024
Direct Negotiation Complete	October 30, 2024

- D. Completion of all selection activities for that round including engagement with providers and rescoping of projects.

Selection Activities and Engagement	Date
Pre-qualification – All selection activities complete & Pre-qualification determination letters sent to applicants	August 9, 2024
Round 1 – All selection activities complete & all preliminarily selected applicants notified	September 9, 2024
Round 2 – All selection activities complete & all preliminarily selected applicants notified	October 4, 2024
Direct Negotiation – All selection activities complete & all preliminarily selected applicants notified	October 30, 2024

### 1.10 Procedure When No Applications Received

**Describe the procedure that the Eligible Entity followed in cases where no applications were initially received.**

Following completion of Round 2, no applications were received for 205 Sub-Project Areas (SPAs) comprising 780 broadband serviceable locations (BSLs). These SPAs/BSLs were included in ConnectLA’s Direct Negotiation process along with all other SPAs/BSLs (401 SPAs comprising 11,227 BSLs) that received applications but were unable to be awarded due to deconfliction rules set forth in IPv2 Section 2.4.6. Reference Funding Amounts (RFAs) were increased for all SPAs from Round 1 levels if they were not already increased in Round 2. These updated RFA levels were made available in advance of the opening of the Direct Negotiation process. Direct negotiations will begin with the submission of offers for available SPAs following the same procedures for application submission as Round 1. Such offers are binding if provisionally selected for award.

All offers submitted during the direct negotiation round must include full scoring information. The state will not, however, make selections solely on scoring and deconfliction rules as was the case for Rounds 1 and 2. Instead, the state will either (a) provisionally select an offer for award, or (b) engage in direct negotiations to reach mutual agreement on a revised offer that the state can provisionally select for award. In determining whether to accept an offer or engage in negotiation to revise any given offer, the state will take into account factors including (a) the number of competing offers for given SPAs received; (b) the overall BEAD program goal of maximizing the number of locations receiving service; and (c) the funding implications of selecting different combinations of available and revised offers to provide Priority and Reliable Broadband Service in light of both Round 1 and Round 2 empirical results as well as Direct Negotiation options available for a given SPA.

### 1.11 Procedure When Adjustments Made to Scope of Submitted Applications

**When the Eligible Entity adjusted the scope of submitted subgrant applications, describe the general process by which project changes were finalized.**

During final analysis of the results of Round 1, Round 2, and the Direct Negotiation process, ConnectLA identified a small number of necessary scope changes to preliminary selections for various reasons. In

each situation, applicants were contacted directly by ConnectLA to address the scope changes and agree to terms that were beneficial to both the applicant and ConnectLA.

### 1.12 Extremely High Cost Per Location Threshold(s)

**Provide the Extremely High Cost Per Location Threshold(s) the Eligible Entity used during the Subgrantee Selection Process.**

Only in the very limited case of 43 locations during the final Direct Negotiation process did Louisiana opt not to select a Priority Broadband Project proposal. For these locations, the per-location proposal funding amount was greater than \$100,000. Based on the empirical evidence of the two primary selection rounds, during which almost all Priority Broadband Project proposals were well below this amount, as well as the fact that during the Direct Negotiation round relatively less competitive intensity occurred, rather than commit to these very high per-location funding amounts for projects deemed at best highly risky and at worst wasteful of public funds, Louisiana opted to select lower-cost Reliable Broadband Service or Alternative Technology applications.

### 1.13 Determination of Extremely High Cost Per Location Threshold(s)

**Describe how the Eligible Entity determined its Extremely High Cost Per Location Threshold(s), as well as how it was applied to the Subgrantee Selection Process.**

As discussed in response to question 1.12 above, Louisiana did not require any significant use of the Extremely High Cost Per Location Threshold (EHCPLT) during its subgrantee selection process. Only in the very limited case of 43 locations during the final Direct Negotiation process did Louisiana opt not to select a Priority Broadband Project proposal because the per-location funding amount was in excess of \$100,000. Those locations instead were awarded to lower-cost Reliable Broadband Service or Alternative Technology applications.

In summary, Louisiana has selected Priority Broadband Projects covering 95.4% of all eligible locations in the state; the total funding amount for all selected projects is \$748.0 million – well within Louisiana’s allocation of \$1.355 billion. Of the 6,393 locations not selected for Priority Broadband Projects, 3,524 received no Priority Broadband Project proposals (or no proposal with a per-location cost below \$100,000) during the two-round selection process and were instead selected for a Reliable Broadband Service according to the state’s subgrantee selection rules. Another 2,869 locations received no application interest at all from Priority or Reliable technology types during either of the two primary rounds or the Direct Negotiation process, and as a result have been selected for an Alternative Technology.

### 1.14 Subgrantee Record Retention

**Certify that the Eligible Entity will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least 3 years from the date of submission of the subgrant’s final expenditure report. This should include all subgrantee network designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.**

ConnectLA certifies that our office will retain all subgrantee records in accordance with 2 C.F.R. § 200.334 at all times, including retaining subgrantee records for a period of at least three (3) years from the date of submission of the subgrant’s final expenditure report. These records will include all subgrantee network

designs, diagrams, project costs, build-out timelines and milestones for project implementation, and capital investment schedules submitted as a part of the application process.

### 1.15 Service to Post-Challenge List of BSLs

**Is there planned or completed service to any NTIA-approved, post-challenge list of BSLs using other federal, state, local, or private funding sources?**

No, there is no planned or completed service to any NTIA-approved, post-challenge list of BSLs using other federal, state, local, or private funding sources.

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## Section 3 Timeline for Implementation (Requirement 3)

### 3.1 Non-Deployment Activities

If the Eligible Entity anticipates eligible non-deployment activities and has not already selected those projects, describe the estimated timeline for completion of subgrantee selection, if applicable. If non-deployment is not anticipated under this program, indicate 'N/A.'

Louisiana plans to pursue 11 projects administered by 9 agencies, with 7 projects run through a competitive subgrant process and 4 directly implemented. The full details of the relevant agencies and approach to programs will be covered in Section 8. Agencies will be responsible for developing the subgrantee process, subject to guidelines and guardrails set by ConnectLA and in accordance with BEAD guidelines. Agencies will be terminally responsible to ConnectLA in delivering outcomes, meeting milestones, and adhering to reporting requirements. ConnectLA will be responsible for auditing agencies' work to ensure BEAD compliance, overseeing project operations (including subgrantee reporting and monitoring), interagency communication, and overall program management.

#### Estimated timeline for completion of subgrantee selection

Activity	Oct	Nov	Dec	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct
<b>Key milestones</b>				◆ NTIA approves application January 19			◆ Final program applications open April 1			◆ Final program activity begins July 1			
<b>1. Preparation phase</b> (e.g., develop application guidelines and eligibility criteria, outreach campaign)	■												
<b>2. If applicable: Technical assistance phase</b> (e.g., offer workshops, webinars, 1:1 support)				■									
<b>3. Application phase</b> (e.g., open competitive application process for entities)				■									
<b>4. Subgrantee selection phase</b> (e.g., review and select eligible applications)					■								
<b>5. Program launch</b> (e.g., begin activity implementation, offer ongoing technical assistance)							■						

For all agencies that will run competitive subgrant processes, Louisiana anticipates the initial round of subgrantee selection (if applicable) will be completed by Q2 2025 across all programs. Some agencies may release additional subgrants over time in line with deployment rollout, based on program performance, etc. Exhibit E details the timeline from Q4 2024-Q4 2025. Sample activities / milestones leading up to subgrantee selection may vary between programs, but are expected to include:

1. Preparation phase (Q4 2024-Q1 2025)
  - a. Refine program guidelines and evaluation criteria
  - b. Develop subgrant application
  - c. Engage external program stakeholders (e.g., companies, researchers), as needed
  - d. Launch statewide marketing and outreach campaign to build awareness of subgrant funding opportunity



2. *If applicable*: Technical assistance phase (Q1 2025 – Q2 2025)
  - a. Host workshops, webinars and 1:1s for prospective applicants to learn about program
3. Application phase (Q2 2025)
  - a. Release Expression of Interest (EOI) form, if applicable, and create applicant shortlist
  - b. Open competitive application period
4. Subgrantee selection phase (Q3 2025)
  - a. Review and select eligible applications
  - b. Notify eligible applicants of program details

### ***Approach to allocate funding to State Agencies***

ConnectLA will allocate funding to the relevant state agencies through interagency transfers. These will be documented through existing State of Louisiana procedures, and each transfer will document the amount of funding to be allocated, key milestones, reporting requirements, and eligible uses, in accordance with the BEAD NOFO.

### ***Approach to ensuring compliance with relevant project milestones***

ConnectLA plans to ensure project milestones will be met through a consistent reporting and monitoring process. Subgrantees will be required to submit timely reports and ensure reporting data is available to the relevant state agency, ConnectLA, and NTIA. All subgrantees will be required to submit monitoring reports, ensuring alignment with the requirements for subgrantee reporting included in Section VII.E.2 of the BEAD NOFO, to document progress of the work completed versus funds spent. Reporting frequency will be determined by risk assessment but will be no less than semi-annually. Monitoring reports will be reviewed by respective agencies, as necessary, to determine progress. Agencies will be required to escalate any issues to ConnectLA, and ConnectLA will be responsible for annual audits of each program to ensure timeliness and BEAD compliance. Each report will describe the various types of projects and/or other eligible activities carried out using the subgrant, and the duration of the subgrant and the report will meet at least the minimum requirements as set forth in the BEAD NOFO, Reporting Requirements – Subgrantees, pg. 90. All subgrantee reports will be available to NTIA upon request. Reports will be submitted through an electronic portal by the Subgrantee, and portal documentation retained will be maintained by Louisiana. Additionally, Subgrantees must maintain sufficient records to substantiate all information provided.

## 3.2 Subgrantee Monitoring

**Describe the measures that the Eligible Entity will take to: (a) ensure that each subgrantees will begin providing services to each customer that desires broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant; (b) ensure that all BEAD subgrant activities are completed at least 120 days prior to June 30, 2032, in accordance with 2 C.F.R. 200.344; and (c) ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by June 30, 2032, in accordance with 2 C.F.R. 200.344.**

ConnectLA required all prospective subgrantees to certify that their construction timeline, from subgrant agreement execution to construction completion and initiation of broadband service, can be completed within four (4) years. ConnectLA will establish interim buildout milestones in each subgrant agreement, enforceable as conditions of the subgrant, to ensure subgrantees are making reasonable progress toward meeting the four (4) year deployment deadline. GUMBO 2.0 awards will be made on a fixed amount

subgrant with a period of performance of four (4) years beginning on the grant date and based on the payment milestone table below:

Milestone	Disbursement (percent of award)	Maximum Cumulative Disbursement (percent of award)
Office approval of detailed project budget and schedule as an addendum to the executed subgrant agreement(s)	10%	10%
Proof that necessary permits have been requested filed with the Office	10%	20%
Proof of binding agreement to acquire BABA-compliant equipment	10%	30%
<b>Provider certification and Office completion of a technical and compliance audit that the provider has reached:<sup>1</sup></b>		
10% of Project BSLs	10%	40%
35% of Project BSLs	15%	55%
60% of Project BSLs	15%	70%
85% of Project BSLs	15%	85%
100% of Project BSLs and the Office's approval of Subgrantee's Completion Report	15%	100%

ConnectLA will only disburse funds for completed deployment activities that comply with the terms included in the subgrant agreement and will withhold funds for failure to do so. GUMBO 2.0 will also include clear penalties in the subgrant agreement for non-performance, failure to meet statutory obligations, or wasteful, fraudulent, or abusive expenditure of grant funds. Such penalties include, but are not limited to, imposition of additional award conditions, payment suspension, award suspension, grant termination, de-obligation of funds, clawback provisions (i.e., provision allowing recoupment of funds previously disbursed), and debarment of organizations and/or personnel.

ConnectLA will implement a robust subgrantee reporting and monitoring plan as outlined in Section 4. Monitoring plans will be delivered to the subgrantees during a Subgrantee Monitoring Kickoff Meeting and the ConnectLA Compliance Team will oversee the monitoring. Monitoring will include frequent communication between the compliance team and the subgrantee with the goal of ensuring a compliant and successful collaboration. Monitoring activities will include both desk reviews of documentation submitted by subgrantees and on-site review of deployment activities. Monitoring will focus on both administrative and financial compliance and on the programmatic requirements relating to Network Capabilities, Deployment Requirements, and Service Obligations. Additionally, ConnectLA will provide subgrantees with training and technical assistance on program related matters. Documentation of communication will be captured. Any delinquencies in project requirements will be documented and may result in corrective action being issued to the subgrantee along with further reporting and status reporting requirements.

ConnectLA will ensure that subgrantees submit a monthly report for each funded project for the duration of the agreement. At a minimum, subgrantees will provide project and expenditure reports, to include but not be limited to, expenditures, project status, subawards, civil rights compliance, equity indicators,

community engagement efforts, geospatial/mapping data, workforce plans and practices, information about subcontracted entities and performance reports, to include, but not be limited to, project outputs and outcomes. Information and documentation related to the requirements above will be collected and reviewed by qualified personnel. ConnectLA will utilize a reporting and compliance portal to capture, organize and manage all reports. All required documentation will be stored in accordance with record retention requirements.

ConnectLA will implement a closeout of the subgrantee agreement when ConnectLA determines that all applicable administrative and program requirements of the applicable Subgrantee between ConnectLA and subrecipient have been completed. The grant close-out process begins ninety (90) days after subgrantee agreement expires OR when the subgrantee notifies ConnectLA that all activities, deliverables, reporting requirements, and disbursements are completed; whichever occurs first.

The Subgrantee role in the grant close-out process includes:

- Expend all grant funds in accordance with needs or return funds.
- Update accomplishments data to reflect all activities completed.
- Update the performance measures for actual versus planned.
- Review final monthly reports to be submitted to ConnectLA.
- Liquidate all financial obligations incurred under the subaward no later than ninety (90) calendar days after the conclusion of the period of performance of the subaward.

ConnectLA will prepare a closeout agreement and submit it to the subgrantee for execution and ensure that all BEAD subgrant activities are completed at least one hundred twenty (120) days prior to June 30, 2032, in accordance with 2 C.F.R. 200.344; and ensure that all programmatic BEAD grant activities undertaken by the Eligible Entity are completed by June 30, 2032, in accordance with 2 C.F.R. 200.344.

## Section 4 Oversight and Accountability Processes (Requirement 4)

### 4.1 Waste, Fraud, and Abuse Hotline

#### **Does the Eligible Entity have a public waste, fraud, and abuse hotline?**

If individuals need to report waste, fraud, or abuse, they can email ConnectLA directly at [connect@la.gov](mailto:connect@la.gov). There are also three statewide oversight agencies in Louisiana where concerns can be reported.

- Louisiana Legislative Auditor [Fraud Hotline](#)
- Louisiana Office of Inspector General [Complaint Form](#)
- Louisiana Office of Attorney General [Complaint Form](#)

### 4.2 Waste, Fraud, and Abuse Hotline

#### **Describe how and when the contact information for the Eligible Entity's public waste, fraud, and abuse hotline has been or will be publicized.**

All contact information for ConnectLA's public waste, fraud, and abuse hotline as well as the three statewide oversight agencies' hotlines were publicly posted on ConnectLA's website on October 2, 2024.

### 4.3 BEAD Monitoring Plan and Policies

#### **Upload the following two required documents:**

- (1) BEAD program monitoring plan;
- (2) Agency policy documentation which includes the following practices:
  - a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize) or on a basis determined by the terms and conditions of a fixed amount subaward agreement; and
  - b. Timely subgrantee (to Eligible Entity) reporting mandates.

See Exhibit E – BEAD Monitoring Plan.

All elements of required agency policy documentation are included in the Draft Subgrant Agreement. See Exhibit F.

### 4.4 Certification for Subgrant Agreements

#### **Certify that the subgrant agreements will include, at a minimum, the following conditions:**

- a. Compliance with Section VII.E of the BEAD NOFO, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the Eligible Entity's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the Eligible Entity's BEAD award;

- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;**
- e. Subgrantee accountability practices that include the use of clawback provisions between the Eligible Entity and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);**
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for the Eligible Entity's Office of Inspector General (or comparable entity) and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and**
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.**

ConnectLA certifies that the subgrantee agreements will include, at a minimum, the following conditions:

- a. Compliance with Section VII.E of the BEAD NOFO, including timely subgrantee reporting mandates, including at least semiannual reporting, for the duration of the subgrant to track the effectiveness of the use of funds provided;
- b. Compliance with obligations set forth in 2 C.F.R. Part 200 and the Department of Commerce Financial Assistance Standard Terms and Conditions;
- c. Compliance with all relevant obligations in the ConnectLA's approved Initial and Final Proposals, including the BEAD General Terms and Conditions and the Specific Award Conditions incorporated into the ConnectLA's BEAD award;
- d. Subgrantee accountability practices that include distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis;
- e. Subgrantee accountability practices that include the use of clawback provisions between the ConnectLA and any subgrantee (i.e., provisions allowing recoupment of funds previously disbursed);
- f. Mandate for subgrantees to publicize telephone numbers and email addresses for ConnectLA's Office point of contact and Office of Inspector General, and/or subgrantees' internal ethics office (or comparable entity) for the purpose of reporting waste, fraud or abuse in the Program. This includes an acknowledge of the responsibility to produce copies of materials used for such purposes upon request of the Federal Program Officer; and
- g. Mechanisms to provide effective oversight, such as subgrantee accountability procedures and practices in use during subgrantee performance, financial management, compliance, and program performance at regular intervals to ensure that subgrantee performance is consistently assessed and tracked over time.

ConnectLA has communicated the requirements stipulated above to all prospective subgrantees prior to the selection process. This has been completed by conducting outreach efforts to participating stakeholders (webinars, in-person meetings, etc.), posting a list of regulations on the ConnectLA website, and including the requirements in grant application instructions and grant agreement terms, conditions and monitoring program requirements. Additionally, ConnectLA publicly posted a draft template of its

broadband deployment subgrant agreement on their [website](#) for transparency purposes, demonstrating that all required components are included.

See Exhibit F for Draft Subgrant Agreement.

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## Section 5 Local Coordination (Requirement 5)

### 5.1 Local Coordination Summary

**Provide a description of the local coordination conducted since the submission of the Eligible Entity's approved Initial Proposal only, and a summary of the impact such coordination had on the content of the Final Proposal, consistent with the requirements set forth in Section IV.C.1.c of the BEAD NOFO. The response must describe how local coordination efforts undertaken reasonably ensure:**

- a. Full geographic coverage of the Eligible Entity;**
- b. Meaningful engagement and outreach to diverse stakeholder groups, labor organizations, and community organizations, including to promote the recruitment of women and other historically marginalized populations for workforce development opportunities and jobs related to BEAD-funded eligible activities;**
- c. Utilization of multiple awareness and participation mechanisms and different methods to convey information and outreach;**
- d. Transparency of processes, to include the documentation and publication of results and outcomes of such coordination and outreach efforts, including additions or changes to the Eligible Entity's Final Proposal;**
- e. Outreach to and direct engagement to unserved and underserved communities to include historically underrepresented and marginalized groups and/or communities.**

Louisiana's Office of Broadband Development and Connectivity (ConnectLA) has undergone a robust public engagement effort to not only educate residents and stakeholders across the state of Louisiana on the significance of participating in today's digital world, but to actively listen and apply this feedback into the development of its Final Proposal. To satisfy diverse engagement metrics and reach covered populations throughout the state, ConnectLA implemented a multi-faceted approach to engagement wherein the needs of individuals were met. Strategies included statewide stakeholder meetings in each major region of the state to ensure full geographic coverage, working closely with statewide associations representing local governments – including the Louisiana Municipal Association, the Louisiana Police Jury Association, and the Louisiana Association of Planning and Development Districts – the use of a variety of communication channels, the development of a robust list of contacts of stakeholders, the development of a comprehensive library of resources, frequent and consistent publication of updates around BEAD funding, leveraging earned media to provide public updates, and partnerships with key entities and organizations throughout the state.

ConnectLA has demonstrated a strong commitment to engaging unserved and underserved communities across the state of Louisiana through its comprehensive outreach efforts for its Granting Underserved Municipalities Broadband Opportunities (GUMBO 2.0) program, which represents the state's infrastructure portion of the federal BEAD subgrant process. Additionally, ConnectLA has focused on engaging these communities and constituencies through related programs like the state's digital opportunity program, including holding a statewide convening and workshop that included discussions related to the GUMBO 2.0 process and timeline, and the state's partnership with the Louisiana Community and Technical College System, which is designing programs and curricula in all parts of the state to educate local constituencies and residents on the state's broadband efforts and highlight near-term workforce opportunities to engage in those activities.

## Regional Meetings

Between June and July 2024, the ConnectLA team traveled to 10 regions covering the entire state of Louisiana to discuss the launch of GUMBO 2.0 and engage directly with residents and stakeholders (see Figure 1). At each meeting, ConnectLA staff provided a high-level overview of BEAD funding received, the GUMBO 2.0 program, and information tailored to their specific region. This included sub-project areas (SPA) locations for that region, the total number of broadband service locations (BSLs), available resources, and a tentative timeline for deployment of projects. At each meeting stakeholders were given the opportunity to ask questions and provide feedback to the ConnectLA team.

Meetings were open to the public and located in central locations that were both accessible and inclusive.

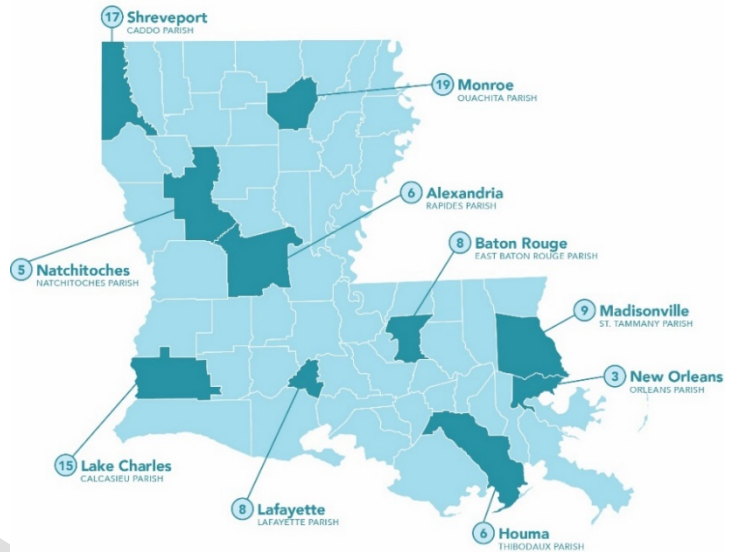
Multiple methods of outreach were used to invite a diverse range of stakeholders, including community anchor institutions, local government leaders, state legislators, NGOs, farm bureaus, state agencies, and internet service providers. Invitees were also asked to share information on the regional meetings with other broadband stakeholders in their area who may be interested in attending – such as economic development organizations, planning and development districts, representatives of industries reliant upon high-speed broadband like agriculture and healthcare, and community anchor institutions, along with local organizations that serve underserved populations – to maximize ConnectLA’s reach to covered populations. While email served as the primary dissemination tool for invites, the ripple effect of community-driven outreach ensured that information about the meetings spread throughout each region.

At each event, staff actively listened to attendees and captured detailed notes, which were used to inform both the development of the final GUMBO 2.0 program and a comprehensive Frequently Asked Questions resource that was shared with potential applicants and posted on ConnectLA’s website. In total, nearly 100 key stakeholders attended these meetings representing hundreds of thousands of constituents and received important information related to the state’s broadband programs they were able to bring back to their stakeholders and communities.

## Statewide Parish Leadership Meetings

As ConnectLA works to plan for, fund, and construct nearly 2,000 broadband projects through its GUMBO 2.0 program, it continues to maintain a high level of engagement and outreach with local government partners to ensure state-led initiatives are coordinated with ongoing efforts to move Louisiana toward digital equity. In addition to regional meetings held throughout June and July 2024, ConnectLA staff have traveled across the state to meet with local government entities such as city councils and parish police

**FIGURE 1:**  
Regional Meeting Attendance





juries to provide additional details about broadband projects in their area, available funding opportunities, and the resources available to residents.

To specifically ensure that ConnectLA connects with unserved and underserved populations, the ConnectLA team reached out to representatives of all 64 parishes offering a meeting with local parish leaders and to present at their parish council (public) meeting to inform them of upcoming broadband projects in their area and offer the opportunity to ask questions directly of ConnectLA leaders. Of these 64 parishes, ConnectLA team reached out to more than 30 via phone and email to schedule meetings with these parishes that include some of the state's most underserved locations with a high number of eligible broadband service locations. The team also reached out to over 60 rotary clubs across the state to offer presentations with the goal of educating local community and business leaders on these programs and gathering input or answering questions about planned broadband expansion activities. By leveraging groups with boots on the ground in their community – such as municipal elected officials, rotary clubs, and parish planning groups – ConnectLA aimed to spread its message directly to covered populations.

To amplify its reach, ConnectLA leveraged partners such as the Louisiana Municipal Association – a statewide member organization that advocates for all 303 municipalities – to share information through communication channels such as newsletters and request the LMA to facilitate direct connections between the state's municipalities and the ConnectLA team. Additionally, the team worked with the Police Jury Association of Louisiana (PJAL) – which represents parish leaders of all 64 parishes with strong engagement in particular by rural parishes – to feature a presentation by ConnectLA at PJAL's seven regional meetings in September and October 2024, providing an additional channel to ensure information about broadband opportunities reaches all areas of the state.

Furthermore, ConnectLA regularly coordinated with the Governor's Office of Rural Development and the Governor's Office of Indian Affairs to provide statewide updates on broadband, progress, and needs. In early 2023, ConnectLA held four tribal consultations with Louisiana's federally recognized tribes to inform them of the development of the digital equity plan and solicit their input and feedback. ConnectLA leveraged that input in the development of the final proposal and has stayed in touch with tribal leaders by providing regular updates via email, mail, and phone about the progress of the GUMBO 2.0 program and the resources available to them.

### **Advancing Digital Opportunity**

ConnectLA recognizes that advancing digital opportunity and combating the state's digital divide requires a coordinated and collaborative effort with its key partners, community anchor institutions, and government leaders. With Louisiana's 2024 Digital Opportunity Plan serving as a guiding compass, ConnectLA continues to identify new avenues to engage stakeholder groups across the state that represent diverse constituencies in its digital opportunity efforts. ConnectLA houses a repository of digital opportunity assets on its webpage to equip residents and stakeholders with the skills and resources needed to address digital opportunity in their own communities.

ConnectLA aggressively shared information about NTIA's Digital Equity Competitive Grant program and strongly encouraged stakeholders and organizations representing historically marginalized populations across the state – including Historically Black Colleges and Universities (HBCUs), local nonprofits and foundations, local libraries, housing authorities, workforce agencies, chambers of commerce, professional associations, social service providers, veterans organizations, and more – to apply for funding through this

program. ConnectLA also requested these organizations share and widely broadcast the funding opportunity to their networks. The ConnectLA team distributed a series of emails and weekly reminders on its social platforms about the grant and application deadline. To ensure it reached tribal populations directly, ConnectLA mailed, emailed, and called all federally recognized and state tribes to provide information and resources regarding NTIA’s digital equity competitive grant program and the Tribal Broadband Connectivity Program.

ConnectLA also hosted an in-person workshop in August 2024 inviting all stakeholders listed above from across the state, where it shared information on its GUMBO 2.0 program and the state’s Digital Opportunity Plan, and equipped workshop attendees with valuable information and skills to help them complete an application for the Digital Equity Competitive Grant program. The workshop (see photo of ConnectLA Executive Director Veneeth Iyengar addressing attendees) included nearly 50 attendees representing a diverse set of statewide organizations that serve the interests of underrepresented groups across the state such as HBCUs, workforce programs, united ways, libraries, parish governments, social service providers, foundations, community colleges, public safety agencies, and chambers of commerce. ConnectLA also made specific requests to these groups to communicate the resources available to their constituencies.



The following organizations attended the workshop:

BetaFlix, Inc	Iberville Parish Government	City of West Monroe
LA Assistive Technology Access Network	Louisiana Department of Public Safety & Corrections	Louisiana Association of United Ways LA211
Rapides Parish Library	Rapides Parish Library	Geaux Healthy PBRC
Louisiana Community and Technical College System	EisnerAmper	Blue Cross Blue Shield of Louisiana Foundation
Acadiana Workforce	Louisiana Office of Technology Services	Hareseca LLC
Pennington Biomedical Center	Southern University – New Orleans	Ouachita Parish
Family & Youth Service Center	Global Data Systems	Grambling State University
Northshore Community Foundation	Geaux Jobs LWDA-20	Donaldsonville Housing Authority
Southern University	The Boot	
DEMCO	St. Tammany Parish Government	

Following the workshop, ConnectLA distributed contact information for all attendees to the full group of attendees to facilitate partnerships and coordination in completing their grant applications.

## **Virtual Webinars**

For stakeholders across the state who were unable to attend an in-person meeting, ConnectLA offered the opportunity to learn more about its GUMBO 2.0 program, prequalification process, and BEAD challenge process through a series of virtual informational webinars where providers and stakeholders across the state could ask questions directly to the ConnectLA team. Recordings of the webinars and materials were posted on ConnectLA's website (example [here](#)).

For those unable to attend the virtual webinars or who wanted to speak more directly with ConnectLA, the office hosted office hours where prospective applicants and other broadband stakeholders could request a meeting with the ConnectLA team.

## **Outreach Mechanisms**

ConnectLA conducted robust outreach by utilizing and layering several outreach tactics and channels to disseminate information to residents and stakeholders across the state, including email, website, social media, media engagement, and direct mail communications.

### **Email Blasts**

Email campaigns are a critical part of a broader digital ecosystem for outreach that can provide updates or calls to action for ConnectLA's stakeholders. ConnectLA leveraged email campaigns to disseminate targeted communication to a comprehensive list of stakeholders ranging from elected officials, industry representatives, HBCUs, NGOs and foundations, to economic development and workforce groups, federally recognized and state tribes, regional planning commissions, and state agencies.

Specifically, ConnectLA leveraged email to share information with potential subgrant applicants on the application process, upcoming webinars, meetings, and workshops, and updates on the submission of the Initial Proposal.

### **ConnectLA Website**

ConnectLA's website, [connect.la.gov](http://connect.la.gov), includes a bank of easily accessible information related to ConnectLA's programs and broadband efforts for the state of Louisiana. The website was frequently updated to ensure that the most up-to-date information was available for broadband stakeholders.

To help maintain transparency of results and processes associated with BEAD funding, ConnectLA posted all related documents on its website, providing supplemental information and guidance to anyone with an interest in the state's programs, including:

- Volumes 1 and 2 of the state's Initial Proposal to NTIA.
  - Louisiana's comprehensive Five-Year Action Plan, which lays out the priorities of the state and outlines how BEAD funds will be allocated throughout the state.
  - Results of the state's BEAD challenge process, where the office partnered with regional planning commissions and the Governor's Office of Rural Development to host stakeholder engagement sessions that helped determine the final list of eligible BEAD locations. ConnectLA also shared all challenges results via Excel spreadsheets and an interactive map of all post-challenge BEAD-eligible locations.
  - Frequently Asked Questions for the GUMBO 2.0 process and BEAD challenge process, which were updated and added to throughout the planning and stakeholder engagement process as new questions were received.
-

- A map and files of all BEAD sub-project areas, which were solicited for public comments in May 2024.
- A searchable table that includes information for each parish on the total number of broadband service locations (BSLs), sub-project areas (SPAs), BEAD eligible locations in each SPA, percentage of BEAD eligible locations within each project, and total reference funding.
- Supplemental notices that provide additional explanations of certain program rules and requirements established in Louisiana’s approved Initial Proposal.
- The list of providers that pre-qualified for GUMBO 2.0 funding.

These resources and documents were also shared through multiple mediums – such as email, meetings, and social media posts – with ConnectLA’s website serving as an accessible, centralized point for all information on the program.

### **Media**

Media serves as a critical touchpoint for reaching ConnectLA’s covered populations and particularly those in underserved and unserved communities, where digital methods such as email or social media may fall short. ConnectLA continues to identify opportunities to capitalize on its working relationships with media across the state to share information on broadband efforts.

ConnectLA has routinely sought to engage with local, statewide, and national media to share information about Louisiana’s broadband activities and programs, with the office frequently leveraging public interest in these programs to educate readers on the state’s work to expand broadband in Louisiana and provide updates on how projects are being planned to address local needs.

One specific way that ConnectLA leveraged media in its outreach efforts was in August 2024, when it hosted a press conference with Louisiana Governor Jeff Landry to announce the official launch of the state’s GUMBO 2.0 program (photo below). ConnectLA distributed a press release and invitations to statewide media, local officials, and various stakeholder groups inviting them to attend and spread information about the launch of the GUMBO 2.0 program. ConnectLA also provided an overview one-pager to attendees with details on the GUMBO 2.0 program.



The below list highlights some of the media mentions and articles covering ConnectLA's broadband activities from the point of Initial Proposal approval to Final Proposal submission. In total, there were 83 articles or mentions involving ConnectLA's work to close the digital divide in Louisiana since the state received approval on its Initial Proposal.

- Broadband Breakfast: [Louisiana the First State to Obtain Approval of Broadband Plan](#)
- The Ouachita Citizen: [West Monroe seeks feedback on broadband](#)
- Fierce Network: [New NTIA tool lets the public monitor state BEAD progress](#)
- KTAL News: [Louisiana making progress in broadband expansion](#)
- Times Picayune/Nola.com: [Louisiana leads other states in race to bring fast internet service to rural areas.](#)
- PBS News: [Rural Louisianians have felt shut out without broadband. The state has a plan to change that.](#)
- American Press: [Louisiana receives internet honors](#)
- ExcelinEd: [Bridging the Digital Divide in the Bayou State: Three Ways Louisiana's State Broadband Plan Supports Students](#)
- Baton Rouge Business Report: [Louisiana is the first state to gain full approval of its 'Internet for All' proposal](#)
- Benton Institute for Broadband & Society: Breaking News: [Louisiana Continues to Lead the Nation on Federal Broadband Funding](#)

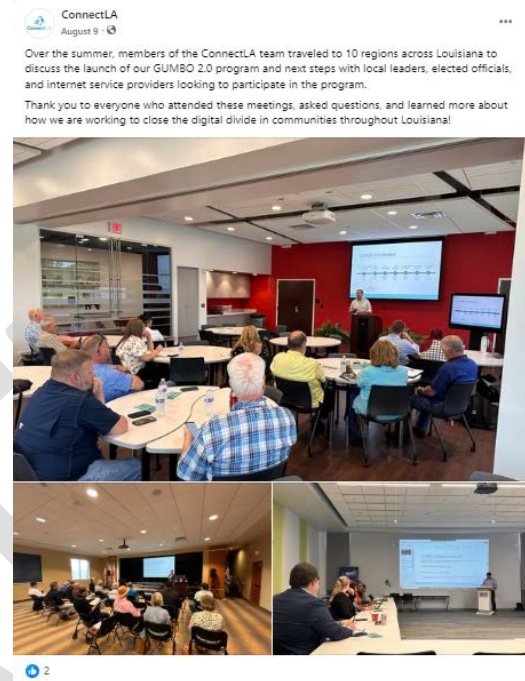
- Communications Daily: [La. Is First State to Get Full Bead Plan Approval](#)
- Broadband Communities News: [Louisiana becomes first state to get NTIA approval for initial Bead program proposal](#)
- WDSU: [Louisiana Gov. Jeff Landry announces launch of largest broadband expansion in state history](#)
- BRProud: [\\$1.355 billion to be used to expand broadband access for Louisiana homes, businesses, schools](#)
- KTBS: [GUMBO 2.0 to use \\$1.3B to expand broadband across the state](#)
- WWNO: [Louisiana Gov. Jeff Landry announces \\$1.35B plan to expand internet access in Louisiana](#)
- KADN: [Louisiana officials announce launch of \\$1.35 billion broadband program](#)
- The Eunice News: [\\$1.35 billion broadband program launched](#)
- The Advocate: [Editorial: Gumbo 2.0 broadband program launched](#)
- KSLA: [Sen. Bill Cassidy speaks to Bossier Chamber of Commerce](#)
- KNOE: [U.S. Senator Bill Cassidy visits Monroe to discuss business, environmental care](#)
- AN17: [Cassidy discusses rural broadband, appropriation for Airport Road roundabout at Amite Chamber](#)

## Social Media

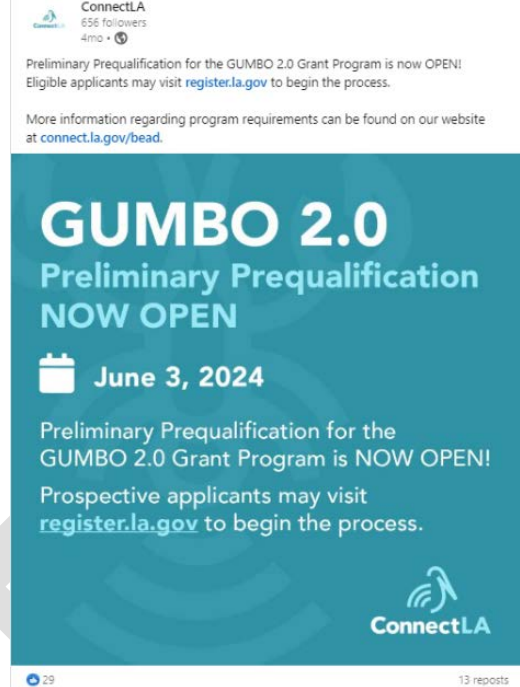
In today's world, people are turning more and more to social media as a source of news and education. ConnectLA remains committed to building a strong social media presence to engage its audiences and continues to leverage its channels primarily on Facebook and LinkedIn to amplify its message through engaging content and graphics announcing funding opportunities, awards, and upcoming webinars and workshops. Examples of social media posts are included below.



*ConnectLA social media posts highlighting recent national successes and promoting funding availability through NTIA's Digital Equity Competitive Grant Program, as well as the corresponding in-person workshop held Aug. 23.*



*ConnectLA social media posts highlighting the state's workshop held in July 2024 to provide an update on the state's BEAD plans and connect interested stakeholders with federal funding opportunities and sharing information about the office's regional meetings held during the summary of 2024.*



*ConnectLA social media posts promoting an informational webinar the state held to discuss the GUMBO 2.0 prequalification phase and highlighting the opening of the GUMBO 2.0 prequalification phase for prospective BEAD applicants.*



*ConnectLA social media post highlighting the Governor’s press conference to announce the launch of the application opening period for the GUMBO 2.0 program.*



## **Direct Mail**

ConnectLA not only embraces modern, innovative strategies for engaging its stakeholders and target populations, but also recognizes the effectiveness of direct mail in capturing attention and ensuring precise targeting.

In August 2024, ConnectLA leveraged this approach by distributing a personalized letter to all 64 parish leaders (parish presidents and police jury presidents) and all 144 legislators (state representatives and state senators) across the state with an update on BEAD funding, GUMBO 2.0, and provisions to ACT 632 – a law that pertains to broadband providers and municipalities.

ConnectLA also mailed, emailed, and called all federally recognized and state tribes to provide information and resources regarding NTIA’s Digital Equity Competitive Grant Program and the Tribal Broadband Connectivity Program and invite them to the NTIA workshop hosted in August.

## **Informational Materials**

Based on ConnectLA’s meetings across the state, public comments received from previous outreach engagements, and virtual webinars, ConnectLA developed a robust suite of informational materials and resources for those interested in applying for ConnectLA’s portion of BEAD funding, including:

- Frequently Asked Questions
- A comprehensive pre-qualification guide that provides prospective applicants with a clear and comprehensive overview of the Louisiana BEAD pre-qualification application process
- A series of maps for each parish that included the total number of locations eligible for BEAD funding, sub-project areas, and estimated cost for each location
- Resources surrounding the state’s BEAD challenge process, including one-pagers and guides on how to submit a challenge to the office and an overview of the process

These resources are prominently featured on ConnectLA’s website and actively promoted at statewide stakeholder meetings. Through these efforts, ConnectLA aims to foster informed participation and bridge gaps in access to broadband funding opportunities for all communities across the state.

## **Public Comment Period on Eligible Sub-Project Areas**

To help inform the final list of sub-project areas eligible for BEAD funding, ConnectLA released draft SPAs on April 18, 2024, for solicitation of public comments through May 18, 2024. Draft SPAs were posted on ConnectLA’s website and public comments were collected electronically. ConnectLA utilized comments received to assist in revisions before the release of final SPAs and reference funding to best achieve the goals of the BEAD program in LA, as provided in the approved Initial Proposal. The process resulted in a total of 3,010 comments.

Several public comments noted that some SPAs were subdivided by waterways. The algorithm that creates the SPA groupings was modified to test if roadways interconnected the BSLs within the SPA. If one or more BEAD-eligible BSLs within a cluster were isolated from the road network, the algorithm could separate the BSLs from the rest of the cluster. This approach led to an overall increase in the quantity of SPAs, including the following changes initiated by the state as a result of these comments:

- The number of SPAs increased from 1,752 to 1,853.

- The number of BEAD eligible broadband serviceable locations (BSLs) decreased from 149,989 to 139,836.

A summary of the comments received, and the resolutions taken are included in the following table:

Comment Category	Count of Comments	Percent of Comments	Category Type	General Description	Category	Resolution
CAI ID	40	1.3%	Location Related	The CAI ID is not in the fabric		There is no resolution for this. There are CAI's in the CLA program which are not in the FCC fabric. These locations have a LocationID that starts with a "2".
CAI Location	1,376	45.7%	Location Related	The CAI location does not have a Latitude or Longitude		These records will be addressed in the final version of Eligible locations approved by NTIA.
CRN	54	1.8%	SPA Related	The identification of the SPA as a CRN is at issue		The identification of a SPA as a CRN is being reviewed and subject to change in the final SPAs that will be published.
Fabric Inaccurate	416	13.8%	Location Related	The FCC provided BSL is considered inaccurate		There is no resolution for this. Per the NTIA's guidelines, the FCC Fabric locations cannot be challenged.
Fabric V4	109	3.6%	Location Related	The FCC provided BSL in V3.2 of the Fabric is not in V4 of the Fabric.		There is no resolution for this. ConnectLA is using version 3.2 of the FCC Fabric.
Location Coverage	846	28.1%	Location Related	The eligibility of the BSL is being challenged		There is no resolution for this. ConnectLA ran a coverage challenge process and the current output of the challenge is final.
Not Clear	1	0.0%	SPA Related	The description was not clear as to why the SPA was being challenged		There is no resolution for this.
SPA Challenging	26	0.9%	SPA Related	The BSLs included in the SPA are challenging to provide service to		The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA Highway	1	0.0%	SPA Related	The BSLs included in the SPA exist on two sides of a highway		The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA Membership	18	0.6%	SPA Related	The BSLs included in the SPA should be assigned to another SPA		The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA RFA	13	0.4%	SPA Related	The SPA's Reference Funding Amount is insufficient to cover the anticipated build cost		The Reference Funding Amount for SPAs is being reviewed and subject to change in the final SPAs that will be published.
SPA Water	110	3.7%	SPA Related	The BSLs included in the SPA exist on two sides of a body of water (river, lake, etc.)		The membership of SPAs is being reviewed and subject to change in the final SPAs that will be published.
<b>Grand Total</b>	<b>3,010</b>					

## Workforce Development for Broadband

ConnectLA's initial proposal for the BEAD program included plans for building a robust workforce prepared to take on the building of broadband infrastructure for hundreds of thousands of locations. To ensure broadband construction projects are completed safely and on-time, the state allocated \$30 million to the Louisiana Community and Technical College System (LCTCS) to offer telecom-related certifications. LCTCS is Louisiana's premier workforce training provider, with 12 colleges serving more than 120,000 students annually, and 65 campuses serving every parish in Louisiana.

ConnectLA partnered with LCTCS to offer fiber optic training programs to students who want to find work in the telecommunications industry. Fiber optics training programs are offered at every community or technical college in Louisiana. Along with the technical understanding of broadband technologies and associated hands-on exercises, the training emphasized the safety, customer service and highly skilled aspects of the network buildout process. Roughly 3,000 graduates are expected by 2025, with 5,000 estimated by 2027. Graduates of this program will help supply the telecommunications and related industries in Louisiana with the talent needed to expand broadband access in the state.

As part of this grant, LCTCS was allocated funding for marketing and outreach aimed at promoting the program through various promotional campaigns, maintenance, and enhancements of microsites with a focus on the recruitment of women and other historically marginalized populations for workforce development opportunities and jobs related to the broadband sector. Additionally, a partnership with the Broadband Nation Platform helped highlight this program and streamline the process of students connecting with industry partners post-graduation.

The objectives of the marketing initiatives were to increase awareness about broadband programs across the state, generate new leads, and develop a social media presence around broadband-related jobs and training programs. LCTCS activated multiple channels, including a digital campaign to attract prospective students to broadband programs at each college and a microsite, [thinkbroadla.com](http://thinkbroadla.com), that promoted these programs and the workforce opportunities available with related credentials. The campaign included social media ads, banner ads and SEO (search engine optimization), persona targeting and retargeting, print ads, billboards, and one-pagers and posters displayed across every LCTCS campus. A press kit of these same materials was provided to each of the colleges as well. The campaign launched with ads branded for each college – see example below:



LTCTS found that broadening the message and featuring women in the ads spurred greater female engagement, as the campaign had a 356% increase in interest by females in September, with the woman-centric ad continuing to outperform other ads. The campaign’s total reach by month, through October 2024, along with associated leads generated through it is outlined in the table below.

Month	Leads	Male	Female	Unknown	Total Reach
May	456	289	165	2	606,646
June	69	23	23	23	301,763
August	267	208	58	1	384,196
September	334	75	256	3	47,980
October	153	40	113	0	338,809
<b>Totals</b>	1,279	635	615	29	1,679,394

Furthermore, LTCTS engaged with external partners to establish rapport with and build adult learning workforce pipelines at all levels. The appropriate credentials were identified to add to the state’s industry-based credential (IBC) list to create opportunities for dual enrollment and jumpstart summer camps geared toward on-ramp credentials for telecommunications careers. Individual colleges were also asked to present new programs to local WIOA boards that included on-the-job training to reskill unemployed and underemployed populations.

In total, as of October 2024, these outreach activities have led to 1,112 credentials awarded across all colleges within the system and 2,223 individual completers, with outreach and marketing efforts continuing to accelerate and build on these early successes.

Of the 2223 completers (as of 10/10/2024):

- 1175 students were not Caucasian (this number includes unknown race/gender).
- 1048 students self-reported as Caucasian
- 178 identified as female

### Non-Deployment Program Design

As ConnectLA conducted outreach to inform the process and eventual awards for BEAD deployment funds, the office similarly engaged with diverse stakeholder groups representing a cross-section of constituencies across the state to inform the design of the state’s non-deployment program. Given the manner in which the state’s deployment and nondeployment programs were designed, this outreach occurred concurrent to outreach and engagement specific to the GUMBO 2.0 program, with inputs and feedback reconciled in preparing this Final Proposal.

The engagements that helped inform the design of the state’s non-deployment program included the following:

### State Agencies

- **Louisiana Board of Regents:** Discussed key educational needs in the state (e.g., tutoring, access to unique classes), how improved access to broadband internet would address these needs, and any further investments that could be helpful.

- **Louisiana Department of Education:** Discussed key educational needs in the state (e.g., tutoring, access to unique classes), how improved access to broadband internet would address these needs, and any further investments that could be helpful.
- **Louisiana Workforce Commission:** Discussed key workforce challenges in the state (e.g., workforce participation rate) and opportunities to address them (e.g., workforce development fund, certifications, etc.).
- **Louisiana Department of Health & the Louisiana Surgeon General:** Discussed key public health challenges across the state (e.g., access to maternal care, behavioral health, particularly in rural and underserved areas) and what investments could help address them.
- **Louisiana Department of Public Safety and Corrections:** Discussed opportunities for more and better educational opportunities for inmates in the state's corrections system by leveraging better internet access.
- **Louisiana Department of Energy and Natural Resources:** Discussed potential resiliency investments and other opportunities that could help ensure reliable access to broadband.

### **Economic Development Organizations**

- **One Acadiana:** Discussed opportunities for increasing competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access on a regional level.
- **Greater New Orleans (GNO) Inc.:** Discussed opportunities for increasing the competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access on a regional level.
- **Louisiana Economic Development:** Discussed opportunities for increasing competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access statewide.

### **Academic Organizations**

- **Louisiana State University AgCenter:** Discussed the needs of the state's agriculture community and to what extent better data and internet connectivity could improve competitiveness and livelihoods for the industry.
- **Fletcher School of Agriculture:** Discussed the needs of the state's agriculture community and to what extent better data and internet connectivity could improve competitiveness and livelihoods for the industry.
- **Louisiana Community and Technical College System:** Discussed key educational needs in the state (e.g., tutoring, access to unique classes), to what extent improved access to broadband internet would address these needs, and any further investments that could be helpful.
- **Calcasieu Parish School Board:** Discussed detailed view of educational needs in rural areas and how virtual tools (e.g., virtual tutoring, access to remote classes) could address these needs.
- **Louisiana State University Center for Energy Studies:** Discussed potential resiliency investments and other opportunities to ensure reliable access to broadband.
- **Louisiana State University Health Office:** Discussed rural health needs in the state and what opportunities telehealth could play in addressing them.

### **Private Businesses**

- **CLECO Power:** Discussed potential resiliency investments and other opportunities to ensure reliable access to broadband.
- **BlueCross BlueShield of Louisiana:** Discussed rural health needs in the state and what opportunities telehealth could play in addressing them.

### **Healthcare Associations**

- **Louisiana Managed Medicaid Association:** Discuss rural health needs in the state and what opportunities telehealth could play in addressing them.
- **Louisiana Primary Care Association:** Discussed rural health needs in the state and what opportunities telehealth could play in addressing them.
- **Louisiana Managed Care Organizations:** Held a roundtable with representatives from multiple Louisiana Managed Care Organizations (MCOs) to discuss rural health needs in the state and what opportunities telehealth could play in addressing them.

### **Public Comment Period on Final Proposal**

ConnectLA will issue the draft Final Proposal for public comments and provide a summary of related outreach activities to solicit comments on the draft in this section, along with any changes to the Final Proposal as a result of feedback received.

### **5.2 Supporting Documentation for Local Coordination Tracker Tool**

**Submit a Local Coordination Tracker Tool with only the Eligible Entity's new or ongoing coordination since the submission of the Initial Proposal.**

See Exhibit G.

## Section 6 Challenge Process Results (Requirement 6)

### 6.1 Successful Completion and Approval of Challenge Process

**Certify that the Eligible Entity has successfully completed the BEAD Challenge Process and received approval of the results from NTIA.**

ConnectLA certifies that it successfully completed the BEAD Challenge Process on January 6, 2024, and received approval of the results from NTIA on July 1, 2024.

### 6.2 Challenge Process Results

**Provide a link to the website where the Eligible Entity has publicly posted the final location classifications (unserved/underserved/CAIs) and note the date that it was publicly posted.**

Following approval of the Challenge Process by NTIA and the required public comment period, ConnectLA publicly posted the final location classifications on their [website](#) on July 1, 2024.

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## Section 7 Unserved and Underserved Locations (Requirement 7)

### 7.1 Certification of Broadband Service Coverage to all Unserved Locations

**Certify whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).**

ConnectLA certifies that it will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

### 7.2 Coverage to all Unserved Locations

**Indicate whether the Eligible Entity will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2), through a BEAD project.**

ConnectLA will ensure coverage of broadband service to all unserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2), through a BEAD project.

### 7.3 Coverage to all Unserved Locations

**If the Eligible Entity certifies that it will ensure coverage of broadband service to all unserved locations, but any such locations will not be served through a BEAD project, provide a brief narrative explaining the methodology of how these locations were identified.**

N/A.

### 7.4 Coverage to all Unserved Locations

**If the Eligible Entity certifies that it will ensure coverage of broadband service for any of the unserved locations, but any such locations will not be served through a BEAD project, upload documentation for each location supporting such a determination, for each reason that applies. For any reason that does not apply, do not upload any attachments under that reason.**

N/A.

### 7.5 Coverage to all Unserved Locations

**If the Eligible Entity does not provide the certification, explain and include a strong showing that the Eligible Entity is financially incapable of ensuring universal coverage of all unserved locations.**

N/A.

### 7.6 Coverage to all Unserved Locations [Attachment]

**If the Eligible Entity does not provide the certification, explain and include a strong showing that the Eligible Entity is financially incapable of ensuring universal coverage of all unserved locations.**

N/A.



### 7.7 Coverage to all Underserved Locations

**Certify whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).**

ConnectLA certifies that it will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

### 7.8 Coverage to all Underserved Locations

**Indicate whether the Eligible Entity will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2), through a BEAD project.**

ConnectLA certifies will ensure coverage of broadband service to all underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2), through a BEAD project.

### 7.9 Coverage to all Underserved Locations

**If the Eligible Entity certifies that it will not ensure coverage of broadband service to all underserved locations, but any such locations will not be served through a BEAD project, provide a brief narrative explaining the methodology of how these locations were identified.**

N/A.

### 7.10 Coverage to all Underserved Locations [Attachment]

**If the Eligible Entity certifies that it will ensure coverage of broadband service for any of the underserved locations, but any such locations will not be served through a BEAD project, upload documentation for each location supporting such a determination, for each reason that applies. For any reason that does not apply, do not upload any attachments under that reason.**

N/A.

### 7.13 Coverage to all Underserved Locations

**Certify the Eligible Entity has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that the Eligible Entity was notified of and did not object to, and/or federally-funded awards for which the Eligible Entity has discretion over where they are spent (e.g., regional commission funding or Capital Projects Fund/State and Local Fiscal Recovery Funds), in its list of proposed projects.**

ConnectLA certifies that it has accounted for all enforceable commitments after the submission of its challenge results, including state enforceable commitments and federal enforceable commitments that ConnectLA was notified of and did not object to, and/or federally-funded awards for which ConnectLA has discretion over where they are spent.

#### 7.14 Coverage to all Underserved Locations [Attachment]

**Provide a signed certification from the Governor to certify that the Eligible Entity will ensure coverage of broadband service to all unserved and underserved locations within its jurisdiction as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2). If the Eligible Entity cannot provide the certification for all unserved and underserved locations, explain in a signed letter from the Governor.**

See Exhibit X (pending) for signed certification from Governor Jeff Landry that ConnectLA will ensure coverage of broadband service to all unserved and underserved locations within its jurisdiction as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2).

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## Section 8 Non-Deployment Uses & Non-Deployment Subgrantee Selections (Requirement 8 & 9)

### 8.1 Non-Deployment Projects

Indicate whether the Eligible Entity has selected or will pursue projects using BEAD funding that are not (f)(1) last-mile broadband deployment projects.

Yes.

### 8.2 100% Deployment Coverage

Confirm whether the Eligible Entity has certified plans to serve ALL (f)(1) last-mile deployment unserved and underserved locations before pursuing projects using BEAD funding that are not (f)(1) last-mile broadband deployment projects or received approval in its Initial Proposal to pursue projects using BEAD funds that are not (f)(1) last-mile broadband deployment projects prior to the certification.

Yes, ConnectLA certified plans to serve all last-mile deployment unserved and underserved locations before pursuing projects using BEAD funding that are not last-mile broadband deployment projects. See Section 7 above.

### 8.3 Non-Deployment Projects Pursued by Eligible Entity

If the Eligible Entity has or intends to pursue non-deployment projects itself without making a subgrant, describe the activities.

Louisiana is planning to use BEAD funding for 5 non-deployment projects without making a subgrant.

Agency	Investment Area	Details	BEAD Allocation <sup>1</sup>
LDOA	1. Underground utility location and management	Comprehensive mapping of critical infrastructure networks across state	\$50M
LBOR	2. Increase graduates in digitally-focused degrees	Expand capacity for post-secondary degrees and credentials in high-demand occupations	\$50M
LDPS&C	3. Transitional work training	Expand work-based learning opportunities to build skills, incl. digital literacy	\$20M
LSU AgCenter	4. Precision agriculture	Upskill farmers on advanced precision agriculture techniques and create comprehensive ecosystem for IoT-based farm digitization	\$20M
TBD	TBD	Louisiana is planning to use the remaining non-deployment funds for a project yet to be defined	~\$13M

<sup>1</sup> Allocation amounts are preliminary – pending Governor approval.

## 1. **Underground Utility Locate and Management (LDOA)**

The Department of Administration's Underground Utility Location and Management program is designed to facilitate the deployment of a safe and reliable broadband infrastructure throughout Louisiana, while minimizing the adverse impacts on existing utilities. The primary objectives include creating a comprehensive, GIS-based map of underground utilities in areas that intersect with BEAD-funded routes. This will allow the state to identify potential conflicts and resolve them during the preconstruction phase of broadband deployment. Additionally, this program will help promote digital equity by enhancing resilience in underserved areas most impacted by potential severe weather. Non-deployment funding allocated to DOA will be directed towards several existing DOA programs/activities:

- a. **STRIKE System for Utility Management:** The plan will leverage the STRIKE system (System for Tracking, Recording, and Identifying Key Existing Utilities) to manage underground utility data and track fiber installation locations. This web-based platform will offer real-time visibility into project progress for stakeholders, allowing for more efficient coordination.
- b. **Comprehensive GIS Mapping and Statewide Utility Infrastructure Mapping:** In addition to mapping underground utilities related to BEAD-funded routes, the state is seeking a waiver to use non-deployment BEAD funds to map utility infrastructure across the entire state—not limited to fiber deployment routes. This will address challenges such as damages to water, sewer, and gas lines, which have already resulted in suspended permits and boil advisories due to previous broadband deployments under other federal programs. Partnering with the Louisiana Office of Transportation and Development and the Governor's Office of Homeland Security and Emergency Preparedness, this program will support both BEAD deployment and other federally funded projects, ensuring the resilience of utility networks during both disaster and non-disaster events.
- c. **Preconstruction Utility Checklist:** Before construction begins, a preconstruction checklist will be generated within the STRIKE system for each work order assigned to ISPs. This checklist will include data on existing utilities and the potential risks for conflicts with fiber installation. It will be digitally signed by the ISP and stored for reference throughout the project.
- d. **Utility Conflict Mitigation and Resolution:** Contractors will submit their proposed fiber installation routes, which will be overlaid with existing utilities in the STRIKE GIS portal. The project team will coordinate with 811 to locate utilities and address conflicts, particularly in hazardous locations such as pipeline crossings. Field surveys will geolocate utilities and resolve any unmarked assets. The use of survey-grade GPS, RTK GNSS equipment, and ground-penetrating radar (GPR) will ensure precise mapping.
- e. **Damage Repair Protocols and Legislative Authority:** In the event of utility strikes, the plan distinguishes between "no-fault" and "at-fault" situations. If no utility markings or knowledge existed, the program will fund and coordinate repair through a dedicated contractor. If the ISP is at fault due to negligence or failure to follow best practices, they will be responsible for repairs. Louisiana has already taken steps to regulate the reporting and repair of damaged utilities during broadband deployment. Under ACT 632, ISPs are required to submit monthly reports on any infrastructure they damage, including details on the location, nature of the damage, and how it was remediated. Failure to submit these reports can result in the suspension of project reimbursements by ConnectLA. Furthermore, ISPs must notify local officials 30 days in advance of any planned construction to improve coordination and prevent utility conflicts.

- f. **Post-Installation Review and Documentation:** Upon completion of the fiber installation, the ISP will provide geospatial data, including shapefiles with the final location of installed fiber lines and connection boxes. A post-installation review will be conducted to ensure no utilities were damaged. The final utility maps will be updated, and project files will be stored in the STRIKE system.

*Justification for implementing activity without making a subgrant*

DOA will implement this program directly without making a subgrant to ensure operational efficiency, as the proposed program is closely tied to DOA's BEAD deployment activities. Underground mapping will require coordination with deployment plans (e.g., aligning on timelines, data sharing, and overall strategic coordination). Since deployment activities are also managed by DOA, program oversight and collaboration will be simplified by directly implementing underground mapping as well.

**2. Increase graduated in digitally-focused degrees (LBOR)**

The Board of Regents' Increase graduates in digitally-focused degrees program aims to grow the number of seats and student completers in high-demand, digitally focused areas critical for Louisiana (e.g., cybersecurity, computer science, telehealth). Increasing attainment across the state in these vital areas can support digital jobs and enable greater health outcomes across the state. Non-deployment funding allocated to BOR will be directed towards several activities:

- a. **Launch new programs:** Support establishment of new degree and credentialing programs for in-demand, digitally focused areas, including cybersecurity, computer science, and telehealth when there is demonstrated need (e.g., regional workforce demand)
- b. **Incorporate digital skills into existing programs:** Support higher education institutions to supplement existing curricula to help equip more graduates with digital skills, and / or embed digital training within curricula, especially for institutions in rural communities
- c. **Expand existing programs to new institutions:** Expand existing degree and credentialing programs in digitally focused fields (e.g., Cyber Academy) to new institutions, especially in rural areas
- d. **Grow graduation rates of new and existing programs:** Support higher education institutions in programs that increase graduation rates of existing digitally focused degree and credentialing programs (e.g., capitation program)
- e. **Conduct marketing for programs:** Launch outreach / public engagement campaigns in underserved areas to grow awareness of BOR's digitally focused degree and credentialing programs

All 34 members of the four higher education systems under the Board of Regents (i.e., Louisiana Community and Technical College System (LCTCS), Louisiana State University System, Southern University System, and University of Louisiana System) will be eligible to receive funding under this program. The Board of Regents plans to leverage several existing programs (e.g., sources of insight, best practice) as part of this program, including:

- **Cyber/Computer Science Capitation Program:** Utilize the newly created Louisiana Cyber Academy together with the existing stand-alone cyber programs at three institutions and computer science programs at 27 institutions to create a capitation program designed to increase the number of students admitted. This will help meet workforce demand for cyber and computer science graduates, which far exceeds the supply in Louisiana. Institutions will receive funding per student, per semester to enroll and complete students beyond established baselines, to grow the number of graduates in these high-demand fields. This will both facilitate the expansion of cyber

and computer science programs to new campuses and enable better outcomes for existing programs adopting these enhanced curricula.

- **Nursing and Allied Health Telehealth Nexus Degree Programs:** Partner with campus health-related programs and the Health Sciences Centers (Louisiana’s public medical schools located in New Orleans and Shreveport) to increase telehealth training, awareness, and access across Louisiana. Sub-activities include:
  - Offer a short-term program or Nexus degree for higher education to provide training to existing health care providers to operate telehealth services
  - Embed telehealth training in institutions through existing allied health programs or supplemental training offered across the state, which will enable graduates to participate in these health care access programs, especially in rural communities
  - Launch a public awareness campaign through the Health Sciences Centers, campus allied health programs, and rural sites (e.g., Ag Extension Centers, public health clinics) to educate people about telehealth; and establish telehealth community sites, especially in rural communities

*Plan for meeting equity, access, and deployment goals*

BOR’s programming meets BEAD’s equity, access, and deployment goals by (1) delivering cyber courses to high-need institutions and (2) targeting areas with low health outcomes for increased telehealth training:

1. **Providing access to institutions without cyber programs:** Cyber programs are expensive to operate due to high-cost faculty and equipment. The Louisiana Cyber Academy will be able to deliver co-created cyber courses to students at institutions across the state, including those that do not currently offer cyber degrees. This will ensure access in rural communities, increase the ability to embed rigorous cyber programs across disciplines and ensure strong participation by Louisiana’s historically black colleges and universities (HBCUs).
2. **Training allied health professionals for telehealth delivery:** The Board of Regents will focus funds to offer short-term training or Nexus degrees to current allied health professionals as well as healthcare students serving in rural areas. Areas that have high need for medical professionals and low health outcomes will be identified as locations for telehealth training. Regents’ institutions can also support or participate in public awareness campaigns on the value of telehealth and develop “how-to guides” to deploy telehealth, as well as assist with community telehealth site selection and establishment of sites.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #2: Remote learning or telehealth services/facilities
- #3: Digital literacy/upskilling
- #4: Computer science, coding and cybersecurity education programs

*Justification for implementing this activity without a subgrant*

The Board of Regents will implement this program directly because it has demonstrated the sufficient level of oversight and ability to implement this program with BEAD non-deployment funding through its prior experience. The Board of Regents has a long history of running similar grant programs to expand

capacity across the four higher education systems' institutions it oversees, especially on the healthcare side, which has given the agency the knowledge base and strong relationships to implement this program smoothly.

Furthermore, the Board of Regents has already implemented much of its proposed programming (e.g., Cyber Academy, Nexus degrees), and is currently seeking to continue expansion into new institutions. Direct implementation will allow for rapid scaling of these programs.

Finally, the variation in regional economic needs and institutions' needs (e.g., the current suite of degree offerings) will necessitate different types of training programs to be built by each institution. Direct implementation will allow for better strategic alignment and easier coordination amongst these groups.

### **3. Transitional Work Training (LDPS&C)**

The LDPS&C Transitional Work Training program aims to expand work-based learning opportunities for incarcerated and formerly incarcerated individuals to enhance their digital skills and improve their employment prospects. In accordance with BEAD non-deployment eligible uses, transitional work trainings will have a virtual component and the occupations being trained will be digitally adjacent. Non-deployment funding allocated to LDPS&C will be directed towards several existing LDPS&C programs/activities:

- **Expand and Enhance Training Programs:** Bolster current work-based learning programs and the expansion of new digital training programs including, but not limited to the following (many of which are digitally adjacent):
    - Automotive Technology/Collision Repair (ASE and I-CAR)
    - Cabling Technology
    - Certified Forklift Technician
    - Commercial Drivers' License Program
    - Cosmetology
    - Culinary
    - Digital Literacy
    - Fiber Optics
    - Logistics Technician (MSSC)
    - Microsoft Office Specialist
    - National Center for Construction Education and Research (NCCER) Programs
    - Occupational Safety and Health Administration (OSHA)
    - Outdoor Power Equipment Technology (EETC)
    - Underground Line Technician
  - **Embed Digital and Career Readiness Cluster:** Incorporate essential career skills (e.g., digital literacy, job life skills, financial literacy, Southwest Customer Service Industry-Based Credential) in work-based learning programs
  - **Implement and Scale Virtual One-Stop Reentry Employment Opportunities (VOS REO):** Scale the virtual platform to improve access to reentry employment opportunities.
-

This project will enhance current transitional programming and expand into additional local correctional facilities, with a priority on rural areas in the southern, central, and northern regions of the state (see details below).

DPS&C's programming meets BEAD's equity, access, and deployment goals by (1) targeting underrepresented and disadvantaged communities in Louisiana, (2) building digital literacy and job skills for underserved populations, and (3) leveraging digital tools to reach facilities in remote areas.

- a. **Targeting Rural and Underserved Areas:** The project will prioritize providing educational programming in correctional facilities in rural and economically disadvantaged regions that have historically lacked access to advanced educational and technological resources.
- b. **Job Skills Training:** The program provides valuable job skills and certifications in fields such as logistics, automotive technology, and culinary arts, helping reduce recidivism and improve employment prospects for the underserved inmate population.
- c. **Digital Expansion:** The project will also leverage digital tools (e.g., VOS REO) to reach individuals in remote areas, ensuring broader access to training.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #2: Remote learning or telehealth services/facilities
- #3: Digital literacy/upskilling
- #8: Prisoner education to promote pre-release digital literacy, job skills, online job acquisition skills, etc.

*Justification for implementing this activity without a subgrant*

LDPS&C will implement this program without making a subgrant because LDPS&C is executing similar programs it intends to support at scale with BEAD funding. LDPS&C currently offers a robust set of 14+ work-based training programs (e.g., Certified Forklift Technician work-based learning program) for incarcerated individuals, and past initiatives by the agency have shown positive outcomes. Programs such as the Louisiana Reentry Court reduced recidivism and improved post-release employment rates in the past. The Caddo Correctional Center fiber optics program has been noted by state officials as a high-impact example of a transitional work program and could potentially be replicable with additional funds. LDPS&C is seeking to expand and enhance its current programming by growing / adapting these current successful programs to rural areas in the southern, central, and northern regions of the state. Additionally, the agency has demonstrated that they have the sufficient level of oversight and ability to implement this expanded program across all participating correctional facilities.

#### **4. Precision Agriculture**

The agricultural sector in Louisiana, with an annual economic impact of \$38.5 billion, stands as a cornerstone of the state's economy. The Internet-of-Things for Digital Equity in Agriculture (IDEA) program aims to provide grants and demonstration pilots to farmers, emphasizing workforce development and innovation, ensuring that farmers and agricultural workers are trained and equipped with the latest skills and knowledge to adopt advanced farming techniques. Additionally, this program aims to increase usage of IoT-based farm digitization tools. Non-deployment funding allocated to LSU AgCenter will be directed towards several existing programs/activities:



- **Equip Farmers with IoT Tools:** Work collaboratively with AgCenter extension parish offices, research stations, and partner institutes to equip small- and medium-scale farmers and non-commodity crop producers with IoT equipment in their respective jurisdictions
- **Precision Agriculture Training:** Provide funding for regional agents and specialists, partner institutions (e.g., community colleges, HBCUs, land-grant institutions), industry partners, and key stakeholders to create education and training programs that help producers and farmers effectively adopt and utilize IDEA resources and advanced precision agriculture techniques
- **Research and Development:** Fund R&D grants for researchers and institutions focused on advancing the creation of cutting-edge decision support systems to integrate farm-scale IoT capabilities with real-time, automated management practices

AgCenter programming meets BEAD's equity, access, and deployment goals by (1) targeting underrepresented and disadvantaged communities in Louisiana, (2) building digital literacy and job skills for underserved populations, and (3) leveraging digital tools to reach facilities in remote areas:

- **Targeted outreach and inclusion:** Funding recipients will be encouraged to identify and conduct outreach to small-scale, non-commodity crop producers, many of whom belong to historically underrepresented communities. The project will initially launch within research stations in rural areas. Through this effort, we will aim to bridge the digital divide that has long excluded these already marginalized groups from the benefits of advanced agricultural technologies.
- **Customized Training and Capacity Building:** Recipients of funding will develop and deliver tailored training programs designed to meet the specific needs of small-scale and non-commodity producers. This includes hands-on demonstrations, workshops, and ongoing support. As a result, underrepresented groups will be equipped with the skills and knowledge necessary to adopt and utilize digital tools effectively, overcoming technical barriers. Eligible precision agriculture training partner institutions (including community colleges, HBCUs, land-grant institutions) will also enable upskilling for farmers and agricultural workers in underrepresented groups.
- **Access to Technology and Resources:** The IDEA project will provide funding to ensure that underrepresented communities have direct access to IoT sensors and other digital tools. Recipients will offer expert consultation to make these technologies more accessible, leveling the playing field and allowing small-scale producers to compete more effectively in the market. At the conclusion of BEAD funding, individual farmers can opt to purchase and install their own nodes, further refining the recommendations of IDEA models for their specific needs.
- **Collaborative Engagement and Empowerment:** AgCenter will form a collaborative stakeholder advisory network that includes representatives from underrepresented communities. This network will play a crucial role in informing the project's direction and ensure the needs and voices of these communities are central to decision-making processes, fostering a sense of ownership and agency among underrepresented groups.

This initiative is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #3: Digital literacy/upskilling

*Justification for implementing activity without making a subgrant*

LSU AgCenter will implement this program without making a subgrant because the institution has demonstrated it has the sufficient level of oversight and ability to implement this program with BEAD non-

deployment funding and the AgCenter has strong existing relationships with farmers across the entire state. LSU AgCenter's 14 research stations located across Louisiana will lead the pilot of the IDEA project. These research stations serve as hubs for agricultural research, innovation, community programming and engagement. The research stations will also play a crucial role in collaborating with neighboring LSU AgCenter Parish Offices in training and supporting local farmers and stakeholders, ensuring that the benefits of digital agriculture reach the broader farming community across the state.

#### 8.4 Non-Deployment Subgrantee Selection Process

**Has the Eligible Entity completed the competitive non-deployment Subgrantee Selection Process?**

No.

#### 8.5 Non-Deployment Subgrantee Selection Process [Attachment]

**If 'Yes' [to Intake Question 8.4], non-deployment subgrantee selection has been completed, complete and submit the Non-Deployment Projects CSV file (named "*fp\_non\_deployment\_projects.csv*") using the NTIA template provided, then proceed to the next section.**

N/A.

#### 8.6 Non-Deployment Subgrantee Selection Process – Consistent with Initial Proposal Volume II

**If 'Yes' [to Intake Question 8.4], non-deployment subgrantee selection has been completed, describe how the process undertaken was consistent with that approved by NTIA in Volume II of the Initial Proposal.**

N/A.

#### 8.7 Non-Deployment Subgrantee Selection Process – Fair, Open, and Competitive Process

**If 'Yes' [to Intake Question 8.4], non-deployment subgrantee selection has been completed, describe the steps that the Eligible Entity took to ensure a fair, open, and competitive process, including processes in place to ensure training, qualifications, and objectiveness of reviewers.**

N/A.

#### 8.8 Non-Deployment Subgrantee Selection Process – Fair, Open, and Competitive Process

**If 'No' [to Intake Question 8.4], non-deployment subgrantee selection has not been completed, describe the following:**

A. Planned Uses of Non-Deployment BEAD funding

**A detailed description of all planned uses of BEAD funding that are not (f)(1) last-mile broadband deployment projects, including the nature of each funded project and how those uses are consistent with the eligible uses in Section IV.B.7.a.iii of the BEAD NOFO;**

Louisiana is planning to use BEAD funding for 7 programs that are not (f)(1) last-mile broadband deployment projects.

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Agency	Investment Area	Details	BEAD Allocation <sup>2</sup>
LDH	1. Telehealth expansion	Support telehealth expansion through new infrastructure and broadband-enabled interventions	\$100M
LWC	2. Job placements in digital jobs	Workforce development fund incentivizing digital training and job placement	\$100M
LDOE	3. Scaling digital K-12 programming	Offer digitally adjacent or virtual programs, incl. HDT; provide schools with cybersecurity support	\$100M
LED	4. Small businesses support (Main Street)	Empower small business with digital tools and resources	\$20M
LED	5. Small business support (priority industries)	Equip legacy businesses with digital tools, upskill their workforce, and support investment in new assets	\$20M
LED	6. Creating new jobs through innovation	Support operations of new venture studio focused on BEAD-related sectors	\$20M
DCRT	7. Wireless connectivity	Provide robust and reliable wireless internet access in cabins / camps of state parks	\$10M

### 1. Telehealth expansion (LDH)

The Telehealth expansion program aims to expand access to healthcare for rural Louisianians through both investments in telehealth adoption and tools/services for maternal health, behavioral health, and chronic disease. Proposed eligible uses for the program’s two tracks (1) broad telehealth expansion and (2) supporting material, behavioral, and chronic disease through telehealth, include:

- **Healthcare analytics:** Data activation for enhanced delivery of care to areas of high rates of chronic conditions or limited healthcare access, in line with broadband expansion
- **Infrastructure investments:** Improvements in provider infrastructure for basic general or specialty care services, enabled by expanded broadband access (e.g., electronic health record systems, digital connected tools such as blood pressure monitors)
- **Digital literacy training:** Consumer and provider education on digital health tools to manage conditions, deploy telehealth services, and support broader education around maternal health, behavioral health, chronic disease management
- **Outreach to rural communities:** Community awareness campaigns, digital literacy trainings and community navigators for technical assistance in hard-to-reach rural parishes

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<sup>2</sup> Allocation amounts are preliminary – pending Governor approval.

- **Practitioner professional development:** Digital skills training for medical practitioners to effectively use telehealth systems and other medical technology
- **Digital devices pilot:** Pilot provision of telehealth devices (e.g., smartphones, tablets) to high need institutions, supplemented by funding to match the Lifeline program
- **Improved screening technology:** Use of digital screening tools for prioritized conditions to ensure proper diagnosis (e.g., mammograms, web-based health screening tools, SDoH digital screening tools in communities)
- **Digitized care delivery and management:** Implementation of remote monitoring, virtual visits, health apps and wearables to better assess and track prioritized conditions
- **Social Determinants of Health (SDOH) improvement:** Investment in community-facing digital tools (e.g., virtual food pantries), tech-enabled transportation to care centers, and digitally supported benefits applications (e.g., SNAP, Medicaid)

This initiative will primarily provide grants across two tracks:

1. Broader telehealth expansion, which seeks to drive adoption of telehealth across the state – with particular focus on priority regions with high need for improved telehealth services, including areas recently experiencing phasing of broadband rollout, rural or underserved areas, or areas with populations of interest / greatest opportunities to improve health outcomes (e.g., Gulf Coast region); and
2. Broadband-enabled interventions (e.g., tools, services) in rural areas for maternal health, behavioral health, and chronic disease.

Across both tracks, there are four types of eligible recipients: care providers, academic institutions, non-profits/foundations, and startups with a telehealth focus. All types of eligible institutions will apply for a grant via a competitive process. Successful applications will provide a plan for meeting program goals of increasing telehealth access and improving health outcomes (e.g., maternal morbidity rates) across Louisiana. Subgrantees must also satisfy geographical criteria by focusing efforts on priority regions, which include areas with recent broadband rollout, rural / underserved communities, and areas with strong opportunity to improve health outcomes (e.g., Gulf Coast region). For both tracks, this program will primarily focus on finding proven solutions – either through applying successful telehealth solutions from other programs (in- and out-of-state), scaling existing solutions, and complementing existing LDH programs and tools (e.g., SHOT program, Breast and Cervical Health Program, Louisiana crisis helplines). Once the program launches, LDH will conduct quarterly and annual evaluations of program performance using KPIs tailored to general telehealth expansion as well as maternal health, behavior health, and chronic disease.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #2: Remote learning or telehealth services/facilities
- #3: Digital literacy/upskilling
- #9: Digital navigators

## 2. Job placements in digital jobs (LWC)

The Building a Broadband Ready Louisiana program is designed to support a wide range of workforce development activities aimed at preparing Louisiana's workforce for the expansion of broadband infrastructure across the state. Key activities and programs include:

- **Training Programs:** Development and implementation of training programs focused on broadband-specific roles (e.g., installation, maintenance) and broadband-adjacent positions.
- **Credential Attainment:** Support for participants in acquiring industry-recognized credentials that are essential for employment in broadband-related fields.
- **Job Placement:** Facilitating job placement in broadband-related jobs, including roles created as a result of expanded broadband access (e.g., cybersecurity analysts, IT support specialists, digital marketing coordinators, software developers, data analysts, and cloud computing specialists)
- **Supportive Services:** Provision of supportive services such as transportation, childcare, and digital literacy training to ensure that participants can successfully complete training programs and secure employment.
- **Regional Collaboration:** Encouragement of regional partnerships among workforce development entities to address specific local needs and enhance the effectiveness of broadband deployment efforts.
- **Digital Skills Training:** Promotion of digital literacy and upskilling through partnerships with programs like Work Ready U, ensuring that workers are equipped for a digitally connected economy.

The program includes a competitive application process where workforce development entities can apply for funding. Selected recipients will be incentivized to prioritize job placement and support participants from underrepresented communities, as well as to collaborate regionally. Applications that involve multiple workforce entities working together, particularly in rural and underserved areas, will be receive higher scoring.

Additionally, the program intends to have higher reimbursement rates for job placements of individuals who are the hardest to serve, such as those from rural areas, long-term unemployed, and those with significant barriers to employment. This sliding scale reimbursement model encourages workforce development entities to focus their efforts on underrepresented populations, ensuring that they benefit from the program's activities.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #1: User training with respect to cybersecurity, privacy, and other digital safety matters
- #3: Digital literacy/upskilling

## 3. Scaling digital K-12 programming (LDOE)

The *Scaling digital K-12 programming* program aims to support Louisiana K-12 schools by offering digitally adjacent or virtual programs, including high dosage tutoring and virtual programs for hard-to-staff courses. These programs are specifically designed to deliver impact to underrepresented communities to ensure every student has access to a high-quality education. Key activities and programs include:

- **Tutoring Program Expansion:** Provide virtual high-dosage tutoring sessions, direct instruction, and formative assessments embedded within the school day, particularly in underserved communities. Leverage existing Steve Carter Program infrastructure, which provides tutoring vouchers to low-proficiency students throughout the state
- **Virtual Course Design:** Establish innovative virtual programming (e.g., curricular documents, supplemental materials, accessibility features) for high-quality courses, including STEM, Dual Enrollment, and Advanced Placement. Tailor program to needs of school systems in underserved or rural areas
- **Virtual Course Implementation:** Create and maintain virtual instruction program through strategic partnerships, innovative technology use, and digital instruction-focused training for educators
- **Digital Tool Adoption:** Support for the adoption and implementation of digital tools to personalize tutoring content, including scaling current usage of Zearn, a platform providing over 1,000 K-8 digital math lessons aligned with state standards, and Kami, a tool providing an interactive digital educational platform with leading accessibility features (e.g., text-to-speech, dyslexia-friendly fonts, optimal character recognition)
- **Cyber and Technical Protection:** If necessary to implement digital interventions listed above, school districts can apply to equip schools with improved cybersecurity protection, including building advanced firewalls, increasing cybersecurity awareness, and enhancing schools' capacity for cyber threat identification. This will also involve ongoing monitoring and assessment of K-12 school system cybersecurity defenses, as well as staff training for recognizing and avoiding cybersecurity threats. To that end, school districts will be required to work with providers that leverage work-based learning approaches so that this investment serves as a learning and training opportunity for the cybersecurity labor force
- **Streamlined Funds Management:** Consolidation of budgeting processes for school systems (e.g., requesting and managing funding) into current SuperApp platform to ensure disadvantaged communities<sup>3</sup> have easy access to BEAD funds

This initiative will also seek to build on and leverage existing programs in the state.

- This program will seek to scale and continue driving initial positive outcomes through the Steve Carter Program (e.g., kindergarten through third grade increased by 10% on the state literacy screener from the fall of 2023 to the spring of 2024). This program is designed to improve educational outcomes specifically by bridging the digital divide for underserved students. Program activity entails virtual high-dosage tutoring sessions, direct instruction, and formative assessments that will help serve students in hard-to-reach areas, and the online Zearn platform will provide a digitally personalized tutoring experience for K-5 students.
- LDOE will seek to leverage Calcasieu Parish's successful virtual program model to execute this program, in which certified teachers deliver live, synchronous instruction from a central location. This model involves a robust project management plan that includes comprehensive educator training, a robust technology infrastructure, curriculum development, and ongoing monitoring

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<sup>3</sup> LDOE uses state's definition of economically disadvantaged for this population (<https://leads13.doe.louisiana.gov/lug/SystemSupport/ED%20Guidance%20-%20NSLP%20-%20ED%20and%20CEP%20Options.pdf>)

and support. The district's existing resources, such as experienced staff and IT infrastructure, will be leveraged, while new partnerships with external organizations will address remaining gaps.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #1: User training with respect to cybersecurity, privacy, and other digital safety matters
- #2: Remote learning services/facilities
- #4: Computer science, coding and cybersecurity education programs

#### **4. Small businesses support – Main Street (LED)**

The *Main Street* program aims to empower both new and existing businesses with the digital skills required to thrive and excel in the state of Louisiana and beyond by providing critical digital tools and resources. Key activities and programs include:

- **Capacity Development:** Promotion of digital literacy and skill development for small businesses (e.g., digital marketing, online marketing, CRMs) by partnering with Louisiana Small Business Development Centers (LSBDCs) and/or qualified small business support organizations through a “Train the Trainer” program
- **Small Business Microgrants:** Provision of microgrants for small businesses to adopt digital skills and tools (e.g., ecommerce solutions, AI tools, CRM software, cybersecurity solutions)
- **Small Business Services Expansion:** Enhancement of the ‘Louisiana Business Hub’, which currently offers online tools (e.g., resource navigator) to connect small businesses with available resources and tools
- **Small Business Outreach:** Demand generation amongst small businesses through a Community of Practice for networking and peer knowledge sharing, as well as information outreach focused on the impact that digitization can have on small business operations

*Main Street* will include separate competitive application processes for 3rd party training providers, LSBDC capacity-building funding, and small business microgrants, as well as additional funding for programmatic outreach programs.

Finally, LED will also work with delivery partners to stand up several wider outreach programs to support core Main Street program infrastructure. LED will fund regional partners to establish a Community of Practice (CoP) where small businesses can network, connect with peers, and exchange knowledge. CoP events may include business roundtables, networking workshops and webinars, expert panels, and mentorship opportunities. These CoPs will be supplemented by direct outreach (e.g., workshops and seminars, online campaigns, local expos, social media campaigns) to raise awareness of the benefits of digitization, especially in historically underserved areas where small businesses may have less experience in operating and using digital technologies.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including

- #1: User training with respect to cybersecurity, privacy, and other digital safety matters
- #3: Digital literacy/upskilling (from beginner-level to advanced)
- #7: Multi-lingual outreach to support adoption and digital literacy
- #11: Costs associated with stakeholder engagement, including travel, capacity-building, or contract support

## 5. Small businesses support – Priority industries (LED)

The *Priority Industries* program aims to equip legacy businesses in key sectors<sup>4</sup> with digital tools and provide training to upskill the workforce to enable them to compete with major players in their industry within and beyond Louisiana. Key activities and programs include:

- **Core Legacy Business Grants:** Deployment of grants (\$50K-\$1M) to legacy businesses within designated key industries that demonstrate a commitment to embracing digital innovation and investing in their workforce. Eligible grant uses include:
  - **Digitize operations:** Adopt technology to modernize operations and enhance business processes
  - **Enhance digital literacy:** Build employee skills in digital tools/technologies
  - **Boost competitiveness:** Strengthen competitive positioning and build competitive advantages
  - **Improve customer experience:** Leverage technology to provide better service
  - **Future-proof business:** Prepare the organization for future challenges and opportunities
  - **Drive innovation:** Support programs that promote technological and operational innovations
  - **Enhance opportunities for Louisiana businesses:** Build processes, systems, or pathways to engage with Louisiana small- to medium-sized businesses as contractors or suppliers
- **Legacy Business Engagement:** Engagement of legacy businesses through workshops, events, etc., focusing on rural areas with high need for digital adoption/upskilling
- **Legacy Business Outreach:** Generation of demand amongst legacy businesses through a Community of Practice for networking and peer knowledge sharing, as well as informational outreach focused on the impact digitization can have on small business operations

The *Priority Industries* program includes a multi-step competitive application process where legacy businesses in predetermined key industries (e.g., Energy, Advanced Manufacturing) may apply for larger digitization grants. Applicants must meet eligibility criteria to apply, including, but not limited to:

- Operates in key sectors identified by LED
- Has operated for 3+ years
- Has exhibited stable or positive financial performance in past 3 years
- Employs 80% of workforce directly (as opposed to contractors or temporary staffing agencies)
- Plans to use funds for approved digital needs

Simultaneously, LED will conduct direct outreach to ensure the Priority Industries program satisfies BEAD's equity and access goals. LED will proactively market straight to businesses to build awareness of the program (vs. working through intermediaries such as LSBDCs in the Main Street program). This will entail funding the establishment of a Community of Practice (CoP) where legacy businesses can network, connect with peers, and exchange knowledge. Dedicated partners for conducting outreach in rural areas will also be selected through a competitive application process that considers organizations' local knowledge of underserved/rural communities.

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #3: Digital literacy/upskilling (from beginner-level to advanced)



- #7: Multi-lingual outreach to support adoption and digital literacy
- #11: Costs associated with stakeholder engagement, including travel, capacity-building, or contract support

## 6. Creating new jobs through innovation (LED)

The *Supporting Innovation and Job Creation in Energy and Advanced Manufacturing* program aims to create and enhance mechanisms that will help build and launch new digital technology companies in the Energy and Advanced Manufacturing sectors in Louisiana, with the potential to expand the program to other priority industries. Key activities and programs include:

- **Corporate R&D grant:** Grant program targeting established companies in key sectors<sup>4</sup> that will support the relocation or expansion of digitally-focused R&D activities in the state; funding could be used for infrastructure to support R&D (e.g., equipment, real estate, activities related to attracting/relocating research talent)
- **Venture studio creation:** Competitive grant funding to support operations of a venture studio that will support the creation of digitally-focused, new companies in key sectors<sup>5</sup> in Louisiana through technical assistance in developing and commercializing new products and through seeking and obtaining funding (i.e., the entire lifecycle of innovation)
- **Incubator/accelerator program development:** After disbursement of funds to support the venture studio, remaining funds will be offered via a competitive grant to attract or expand technology-focused accelerator or incubator programs that will complement the program offered through the venture studio

This program is in line with non-deployment uses in Section IV.B.7.a.iii of the BEAD NOFO, including:

- #12: Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described below in Section V.H.2 of this NOFO

## 7. Wireless Connectivity (DCRT)

The Department of Culture, Recreation, and Tourism's *Wireless Connectivity* program seeks to provide robust and reliable wireless internet access to visitors of state parks, including those who stay in cabins and campgrounds. By enhancing digital infrastructure, DCRT aims to improve visitor experience, promote digital inclusion in rural areas, and ensure its parks remain attractive destinations for tourists and local communities alike, especially for disadvantaged populations. This project will promoting equitable access to high-speed internet. Key activities and programs include:

- **Expand WiFi coverage in parks:** Support adoption of fixed wireless repeater solutions that expand existing fiber connectivity throughout park locations frequented by visitors. DCRT will focus

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<sup>4</sup> Key sectors are defined by LED as having one or more of the following characteristics: tradeable sector (i.e., goods and services can be sold and consumed outside of the region where they are produced), large employment footprint, potential for multi-region impact, potentially critical sector for rural areas, documented state priority sector.

<sup>5</sup> Key sectors are defined by LED as having one or more of the following characteristics: tradeable sector (i.e., goods and services can be sold and consumed outside of the region where they are produced), large employment footprint, potential for multi-region impact, potentially critical sector for rural areas, documented state priority sector.

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expanding WiFi coverage at 41 state park locations that are in BEAD deployment sub-project areas (SPAs)

- **New ranger technologies:** Upgrade park rangers' existing technology (e.g., assistive listening devices) to help better serve park visitors with disabilities
- **Mobile alert system:** Introduce emergency update system to notify park visitors of any critical updates (e.g., flooding emergency)
- **Smart home campsite upgrades:** Acquire and install digital smart home upgrades (e.g., digital smart locks, web-based guest check-in) at state park facilities to improve quality of guest stays
- **Marketing and promotion:** Promote improved Wi-Fi services through key marketing channels, signage, or online platforms

DCRT will select eligible subgrantees through a competitive application process. DCRT will concentrate program activities on a targeted set of 41 state park locations that are in BEAD deployment sub-project areas (SPAs), amounting to approximately ~1/3 of all 129 state park locations. These parks will be prioritized for funding as they are largely in rural and underserved areas with historically low connectivity, and non-deployment funds can be used to expand WiFi coverage once broadband connectivity is delivered to these locations through BEAD deployment.

#### B. Non-Deployment Projects Addressing Needs of Residents

**How the Eligible Entity expects the non-deployment projects to address the needs of the Eligible Entity's residents and how the non-deployment projects are effective in achieving the BEAD Program's equity, access, and deployment goals;**

##### *Overview of non-deployment programs' projected impact on Louisiana residents*

Non-deployment programs are designed to operate within disadvantaged and rural communities, which often face significant barriers to broadband access and economic opportunities. By focusing on these areas, these programs aim to bridge the digital divide and promote economic inclusion. The proposal prioritizes applications that demonstrate a strong impact on underrepresented communities, particularly those in rural areas of Louisiana. This ensures that the programs directly address the needs of populations that have historically been underserved in terms of broadband access and workforce development. Leaders of this program have implemented similar programs that have been effective and demonstrated the ability to achieve results, including:

- **Reboot Your Career program** launched by LCTCS to help workers who were unemployed due to COVID-19 retrain for jobs in high-wage career pathways
- **Delta Regional Authority**, which implemented several workforce development programs across its eight-state region, including parts of Louisiana, that successfully increased workforce participation, particularly in rural and underserved areas, by providing targeted training and support services
- **Greater New Orleans Mechatronics Apprenticeship Program**, which provides hands-on training in mechatronics, a field that integrates mechanical, electrical, and computer engineering. It offers apprenticeships that combine classroom instruction with practical experience, preparing participants for high-demand jobs in advanced manufacturing.

## 1. Telehealth expansion (LDH)

### *Expected impact for Louisiana residents*

The *Telehealth Expansion* program is expected to address needs of residents by growing supply and demand for telehealth services, as well as improving maternal health, behavioral health, and chronic disease outcomes.

LDH has identified several expected impacts with its broad telehealth expansion program:

- **Increased supply of telehealth services** incl. increasing education, awareness of telehealth implementation, digital screenings, and improving care delivery, patient engagement, and continuous care management
- **Increased demand for telehealth services** incl. increasing education, awareness, and training for utilizing digital tools for prioritized conditions to improve preventive health

LDH is focusing its broadband-enabled interventions on the 3 critical areas of maternal health, behavioral health and chronic disease programs as Louisiana significant challenges in those areas. For example, based on CDC data:

- **Maternal Health:** Louisiana ranks 5<sup>th</sup> highest (out of 38 states reporting) in the US for maternal mortality rates (37.3 deaths per 100,000 people)
- **Behavioral Health:** Louisiana ranks 7<sup>th</sup> highest in the US for depression prevalence (23.5% of adults self-reporting lifetime diagnosis of depression)
- **Chronic disease programs:** Louisiana ranks 9<sup>th</sup> highest in the US for cancer mortality (160 deaths per 100,000 people)

### *Plan for meeting equity, access, and deployment goals*

The *Telehealth Expansion* program will meet BEAD's equity, access, and deployment goals by (1) focusing on priority geographies, (2) targeting high-need beneficiaries, and (3) working with community-based organizations and other nonprofits.

1. **Target priority regions** with high need for improved telehealth services, including areas recently experiencing phasing of broadband rollout, rural or underserved areas, or areas with populations of interest/greatest opportunities to improve health outcomes (e.g., Gulf Coast region).
2. **Target high-need beneficiaries** in rural communities including priority residents directly accessing healthcare opportunities and care providers focused on maternal health, behavioral health, and chronic disease management and academic/non-profit/private institutions.
3. **Work with community-based organizations (CBOs)** and other nonprofits and foundations to reach underrepresented and rural populations, providing supportive services, and informing impacted beneficiaries of program. Community-based organizations can function as localized hubs for outreach, training, and credentialing in historically underserved areas, which will empower institutions in these communities to participate in the program, apply for grant funding, and receive the necessary training and toolkit to implement that funding to promote telehealth infrastructure in the region.

## 2. Job placements in digital jobs (LWC)

### *Expected impact for Louisiana residents*

The *Building a Broadband Ready Louisiana* program is expected to address needs of residents by supporting job creation in digital sectors due to broadband expansion. ~35K participants are expected to receive LWC's training, credentialing, and job placement services, many of whom will be from underserved communities. These services will be delivered by LWC's local workforce boards and their regional partners. The breakdown of primarily expected impacts is as follows:

- Increased number of individuals enrolled in training through LWDBs
- Increased number of credentials attained by program participants
- Increased number of participants placed in broadband jobs

Additional expected impacts include, but are not limited to:

- **Economic Growth and Job Creation:** Align workforce development with the demands of broadband expansion to drive job creation and economic growth in digital sectors.
- **Broadband Expansion and Connectivity:** Develop and implement workforce solutions that directly support the expansion of broadband infrastructure across Louisiana
- **Enhanced Workforce Readiness and Skills:** Equip Louisiana's workforce with the necessary skills and credentials to thrive in a digitally connected economy, thereby increasing workforce participation rates and economic self-sufficiency; encourage workforce development entities to improve participants' digital skills through partnerships

### *Plan for meeting equity, access, and deployment goals*

The *Building a Broadband Ready Louisiana* program will meet BEAD's equity, access, and deployment goals by (1) conducting rural-specific outreach, (2) incentivize workforce development entities to engage with rural geographies, and (3) conduct rural-specific performance evaluation.

1. **Conduct rural outreach and engagement:** Partner with local community organizations and leaders to raise awareness, utilize mobile training units to bring education and training directly to rural areas, and leverage existing rural broadband infrastructure projects to identify and recruit participants.
2. **Incentivize for rural participation:** Offer higher reimbursement rates for workforce development entities successfully enrolling, credentialing, and placing participants from rural areas. Additional seed funding will be available for programs specifically targeting rural workforce development.
3. **Conduct rural-specific performance evaluation:** Track distinct rural engagement metrics (e.g., number of job placements in rural communities), include rural specific sections in quarterly and annual reporting, and host regular feedback sessions with rural stakeholders to ensure the program meets their unique needs.

## 3. Scaling digital K-12 programming (LDOE)

### *Expected impact for Louisiana residents*

The *Scaling digital K-12 programming* program is expected to address the needs of residents by providing high-need students with digital programming and support resources. ~300K K-12 students are eligible to

receive LDOE’s services annually through 2028, many of whom will be from underserved communities. The breakdown of expected impact is as follows:

- Increased access to educational support through virtual high-dosage tutoring or quality virtual instruction (e.g., hard-to-staff courses) for students statewide, including many with low proficiency levels
- Increased access to personalized learning and technology-based support
- Increased number of 8<sup>th</sup>-12<sup>th</sup> graders in high-need areas receiving virtual instruction through highly-qualified teachers as part of existing virtual instruction cohort
- Improved cybersecurity infrastructure state-wide for students and staff

*Plan for meeting equity, access, and deployment goals*

The *Scaling digital K-12 programming* program will meet BEAD’s equity, access, and deployment goals by (1) targeting highest-need student demographics; (2) providing tutoring within the school day rather than after school; (3) utilizing accessible technology; and (4) offering targeted outreach and assistance for rural schools.

1. **Target disadvantaged students and educators**<sup>6</sup> through a needs-based competitive application process for both high dosage tutoring (e.g., systems apply by detailing number of students below proficiency in literacy and numeracy) virtual programming support (e.g., systems must outline specific hard-to-staff courses / education gaps in their district, both of which disproportionately affect schools in underrepresented communities). Funding for high dosage tutoring will be allocated based on an equitable per-pupil distribution. This targeted approach helps to bridge educational disparities and promotes access to quality education across the state.
2. **Embed tutoring within the school day**, instead of after-school, to ensure that all eligible students, regardless of their socioeconomic status, receive the necessary support. Many underprivileged students can be excluded from traditional after-school tutoring programs due to limited home internet access, after-school transportation issues, and additional personal obligations. Tutoring during the school day is consensually recognized as best practice to drive equitable impact.
3. **Promote accessible technology**, such as Zearn and Kami, a digital platform for educational content that provides a range of accommodations for all students who need them (e.g., text-to-speech, speech-to-text, optical character recognition, dyslexia-friendly fonts). Kami will be rolled out for all K-12 students in Louisiana, and will help bridge the digital divide for students with disabilities in particular.
4. **Conduct proactive outreach and assistance** to encourage disadvantaged schools<sup>7</sup> to apply for and secure the financial resources necessary to bolster their cyber defenses. This proactive approach

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<sup>6</sup> LDOE uses state’s definition of economically disadvantaged for this population (<https://leads13.doe.louisiana.gov/lug/SystemSupport/ED%20Guidance%20-%20NSLP%20-%20ED%20and%20CEP%20Options.pdf>)

<sup>7</sup> LDOE uses state’s definition of economically disadvantaged for this population (<https://leads13.doe.louisiana.gov/lug/SystemSupport/ED%20Guidance%20-%20NSLP%20-%20ED%20and%20CEP%20Options.pdf>)

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will ensure that all students, regardless of their geographical location, have access to a safe and secure online learning environment.

#### **4. Small businesses support (Main Street)**

##### *Expected impact for Louisiana residents*

The *Main Street* Program is expected to address needs of residents by reducing the digital divide for small businesses, driving economic growth in rural/underserved communities, and encouraging stronger regional collaboration amongst small businesses. Companies are expected to receive support to integrate digital skills and tools into their operations, many of whom will be from underserved communities or other priority geographies.

Other expected impacts include, but are not limited to:

- **Reduction in digital divide:** Improving digital literacy and access to necessary tools, services, and infrastructure for small businesses in underserved areas
- **Economic growth:** Business expansion, job creation, and increased efficiency for small businesses with adoption of digital tools in underserved areas; additional potential for out-of-state sales through online channels
- **Regional collaboration:** Enhanced networking, collaboration, and knowledge sharing of digital best practices/resources among local businesses

##### *Plan for meeting equity, access, and deployment goals*

The *Main Street* program will meet BEAD's equity, access, and deployment goals by (1) targeting priority geographies, (2) offering additional supportive infrastructure in underserved communities, and (3) collaborating with local community organizations for outreach.

1. **Targeted service delivery:** The program targets rural areas, underserved communities, and parishes that often miss out on opportunities to enhance their digital presence and competitiveness, as well as ConnectLA deployment areas being served with high-speed internet for the first time. Businesses located in these areas may be prioritized for the program. By supporting these businesses, the program will narrow scope to primarily serve high-need communities with minimal historical access to broadband, helping to bridge the digital divide and build economic growth
2. **Supportive services and accessibility:** To ensure that these programs reach rural areas and underserved communities, it may establish weekly or monthly pop-up centers in rural areas. These centers may bring training and technical assistance directly to these regions, offering hands-on support for digital upskilling
3. **Collaborate with specialized community-based organizations:** The program aims to partner with community-based organizations such as churches, community centers, libraries, youth groups, and support groups, the program could effectively reach and engage underrepresented populations

## 5. Small businesses support (Priority industries)

### *Expected impact for Louisiana residents*

The *Priority Industries* program is expected to address needs of residents by driving economic growth through improved performance of legacy companies in key industries, as well as upskilling the workforce. The breakdown of expected impact is as follows:

- Digitization of companies in key industries through grants
- Increase in employment within supported businesses within 12 months of digital tool adoption
- Sales growth among participating businesses within 12 months of implementing digital tools

Other expected impacts include, but are not limited to:

- **Reduction in digital divide:** Improving digital literacy and providing access to necessary tools and infrastructure, so underserved communities can better participate in the digital economy
- **Economic growth and development:** Legacy businesses in rural and underserved communities can leverage digital tools to improve their operations, reach new markets, and increase their productivity. This can stimulate local economies and create new job opportunities
- **Stronger regional collaboration:** Legacy business engagement and outreach could coordinate efforts in addressing local challenges and encouraging regional development
- **Improved access to services:** Digital adoption can enable legacy businesses to access a wider range of services that were previously unavailable or difficult to reach due to geographic limitations
- **Enhanced customer experience:** By adopting digital tools, legacy businesses can offer more personalized and efficient services to their customers, improving customer satisfaction and loyalty
- **Increased out-of-state revenue:** Increase in out-of-state revenue due to enhanced business capabilities and expanded market reach
- **Employment growth:** As businesses grow and expand due to the adoption of digital tools, there is anticipated to be an increase in employment opportunities

### *Plan for meeting equity, access, and deployment goals*

The *Priority Industries* program will meet BEAD's equity, access, and deployment goals by (1) targeting rural areas for service delivery, (2) providing digital skills training for legacy businesses, (3) driving overall economic development, (4) adopting ongoing assessments to ensure community needs are met, and (5) collaborating with community-based organizations to reach underrepresented populations.

- **Targeted rural service delivery:** The fund may target rural areas, underserved communities, and parishes that often miss out on opportunities to enhance their digital presence and competitiveness. Businesses located in these areas may be prioritized for the funds. By supporting these businesses, the program aims to improve their local operations and expand their reach nationally, helping to bridge the digital divide and build economic growth
- **Digital skills training and adoption:** The proposal highlights the importance of enhancing digital skills and adoption for legacy businesses, particularly through collaborations with trade associations. By concentrating on digital upskilling and adoption, the fund aims to help businesses in rural and

underrepresented communities become more competitive and efficient using digital platforms and products

- **Economic development:** Through the digital upskilling and adoption legacy businesses could engage in e-commerce, digital marketing, and online services, driving economic activity and attracting investment to the region, this could create more job opportunities and contribute to reducing unemployment within the community
- **Ongoing evaluation and adjustments:** The fund may adopt ongoing assessment to ensure that businesses remain relevant and effective, adapting to the evolving needs of the community and technological advancements
- **Collaborate with specialized community-based organizations:** The fund aims to partner with community-based organizations such as churches, community centers, libraries, youth groups, and support groups, the core business grant could effectively reach and engage underrepresented populations

## 6. Creating new jobs through innovation (LED)

*Expected impact for Louisiana residents*

The *Supporting Innovation and Job Creation in Energy and Advanced Manufacturing* program is expected to address needs of residents by catalyzing Louisiana's innovation ecosystem. At a high level, LED anticipates revenue and job growth at participating companies as well as long-term retention of these companies in the state. More specifically, anticipated impacts include:

- **Expansions and relocations of corporate R&D focused on digital technology,** including relocation or creation of skilled, well-paying jobs
- **New start-ups created in Louisiana** over the course of the BEAD performance period, and new skilled jobs
- **Increased innovation in Energy and Advanced Manufacturing,** and increased productivity in these sectors due to adoption of new technologies and the growth of a more specialized workforce
- **Increased engagement with businesses in rural areas** and with those operated by minority and women entrepreneurs as encouraged by venture studio

*Plan for meeting equity, access, and deployment goals*

The *Supporting Innovation and Job Creation in Energy and Advanced Manufacturing* program will meet BEAD's equity, access, and deployment goals by (1) incentivizing engagement in rural areas, (2) incentivizing engagement for minority-/women-owned businesses, (3) instituting a hybrid engagement model in remote regions, and (4) partnering with local institutions to tailor programming to specific geographical needs.

- **Rural focus:** Specific focus can be placed on growing Energy and Advanced Manufacturing businesses and innovation in rural areas of the state, with additional value potentially placed on grant applications for companies in rural areas and additional points awarded to venture studio proposals that incorporate a framework for specifically engaging and supporting businesses located in rural areas



- **Minority-/women-owned business focus:** Similarly, venture studio proposals may be awarded extra points when specifically addressing a strategy for engaging and supporting minority and woman entrepreneurs
- **Hybrid model in remote regions:** Project will deliver specialized programming and services to remote geographic regions and underserved populations using a hybrid model, allowing for much interaction to occur online, combined with a boots-on-the-ground approach that allows for the programs to cater to the unique needs of individual companies and entrepreneurs
- **Local outreach through partnerships:** LED plans to engage local partners (e.g., chambers of commerce, city councils, other EDOs) throughout the state to ensure effective outreach and engagement and will align programming with local and regional strategic plans as much as possible, leveraging the BEAD non-deployment funds to help catalyze these strategies as well

## 7. Wireless connectivity (DCRT)

### *Expected impacts for Louisiana residents*

The *Wireless Connectivity* program is expected to meet resident needs by improving the park visitation experience in Louisiana’s 41 state park locations, addressing connectivity gaps in rural and underserved areas, and promoting equitable access to high-speed internet. Increased connectivity is also expected to increase visitation, promote extended visitation, and foster stronger community pillars in rural areas. More specifically, anticipated impacts include:

- **Increased engagement and visitation** across 41 state parks due to improved visitor experience (e.g., access maps and park information, smart home improvements for guest stays)
- **Economic growth in rural areas** due to attraction of additional visitors and spending, incl. remote workers, to state parks in rural / underserved areas
  - Impact would go back to the parks to further increase visitation and offerings, create stronger community pillars in these rural areas, and raise awareness of connectivity offerings in these communities
- **Increased accessibility for people with disabilities** through adoption of digital tools and technologies
- **Enhanced emergency response** contributing to improved public safety outcomes

### *Plan for meeting equity, access, and deployment goals*

The *Wireless Connectivity* program will meet BEAD’s equity, access, and deployment goals by (1) providing connectivity to businesses / residents in underserved areas and (2) driving parks accessibility with digital tools

- **Focus on underserved areas:** Prioritize funding parks in historically underserved areas; businesses and residents in these areas will benefit from increased economic activity and more reliable internet access, driving economic impact for surrounding communities
- **Increased accessibility:** Support adoption of digital tools that can help make park visitation more accessible for people with disabilities

## C. Stakeholder Engagement

**The ways in which engagement with stakeholders informed the selection of eligible non-deployment projects; and**

The ConnectLA office conducted rigorous stakeholder outreach to identify potential investments that could support these goals. Meetings were held with 20+ organizations, including state agencies, economic development organizations, academic institutions, private businesses and healthcare associations, to further identify needs of the Louisianians and identify potential areas to invest.

#### *Key stakeholder engagement mechanisms*

Mechanisms used to engage these stakeholders included:

- **Regional meetings:** ConnectLA team traveled to 10 regions across Louisiana (e.g., Shreveport, New Orleans, Houma, Alexandria) to directly engage with a broad range of residents and stakeholders. Meetings were open to the public, and multiple methods of outreach were used to invite all relevant stakeholders, including state agencies, economic development organizations, academic organizations, private businesses, and healthcare organizations in industries reliant on broadband infrastructure. Invitees were also encouraged to share information on the regional meetings with other broadband stakeholders in their area (e.g., representatives of industries reliant upon high-speed broadband like agriculture and healthcare) to ensure local stakeholders in each region were reached.
- **Workshops:** ConnectLA hosted an in-person informational workshop in August 2024 inviting stakeholders, including some state agencies, shared to learn about BEAD programming and the state's Digital Opportunity Plan.
- **Virtual Webinars:** ConnectLA offered a set of virtual informational webinars where stakeholders could ask ConnectLA team questions, as well as office hours where stakeholders could host 1:1 meetings with the ConnectLA team.
- **Targeted Outreach:** ConnectLA conducted a robust outreach plan to disseminate information to residents and stakeholders across the state, including underserved areas. The plan included sending informational email blasts, keeping ConnectLA's website up-to-date, engaging with local, statewide, and national media, maintaining an active social media, presence, and distributing direct mail to key stakeholders.
- See Section 5: Local Coordination for additional detail.

#### *Recap of stakeholder conversations*

Throughout the Spring of 2024 ConnectLA held dozens of conversations to identify projects and also assess what would be the optimal approach to allocate BEAD funding. Through these conversations ConnectLA came to understand the importance of leveraging State Agency expertise in ultimate project selection and oversight. Given the likely size of non-deployment funding that was expected to be made available and the breadth of likely projects, the State could best ensure the efficacy and impact of its spend by leveraging State agencies to oversee specific funding allocations.

Ultimately, input from these stakeholder conversations gave ConnectLA an understanding of the key needs throughout the state that fit with BEAD's program goals. ConnectLA isolated several key opportunity areas to pursue with non-deployment funding across 3 strategic pillars (see the *Process for assessing non-deployment activities* section below). Key opportunity areas we settled on during stakeholder conversations included:

- Drive economic competitiveness

- Increase competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access
- Improve competitiveness and livelihoods for the industry through better data and internet connectivity
- Improve infrastructure resilience
- Train Louisianans for Digital Jobs
- Improve tutoring and access to unique classes such as Advanced Placement courses
- Increase workforce participation rate and job placement
- Opportunity for better educational opportunities for inmates
- Deliver a healthy community
- Increase access to maternal care and behavioral health, particularly in rural and underserved areas

Stakeholder Group	Organization	Discussion Topics
<b>State Agencies</b>	Louisiana Board of Regents	Discussed key educational needs in the State (e.g., tutoring, access to unique classes), to what extent improved access to broadband internet would address these needs and any further investments that could be helpful.
	Louisiana Department of Education	Discussed key educational needs in the State (e.g., tutoring, access to unique classes), to what extent improved access to broadband internet would address these needs and any further investments that could be helpful.
	Louisiana Workforce Commission	Discussed key workforce challenges in the State (e.g., workforce participation rate) and opportunities to address them (e.g., workforce development fund, certifications, etc.)
	Louisiana Department of Health (LDH) & Surgeon General	Discussed key public health challenges across the State (e.g., access to maternal care, behavioral health, particularly in rural and underserved areas) and what investments could help address them.
	Louisiana Department of Public Safety and Corrections (DPSC)	Discussed opportunities for more and better educational opportunities for inmates in corrections system, leveraging better internet access.
	Louisiana Department of Energy and Natural Resources	Discussed potential resiliency investments and other opportunities to ensure reliable access to broadband (deprioritized)
<b>Economic Development Organizations</b>	One Acadiana	Discussed opportunities for increasing competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access in their region.
	Greater New Orleans (GNO) Inc.	Discussed opportunities for increasing competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access in their region.
	Louisiana Economic Development (LED)	Discussed opportunities for increasing competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access in their region.
<b>Academic Organizations</b>	Louisiana State University (LSU) AgCenter	Discussed the needs of the State's agriculture community and to what extent better data and internet connectivity could improve competitiveness and livelihoods for the industry.

	Fletcher School of Agriculture	Discussed the needs of the State’s agriculture community and to what extent better data and internet connectivity could improve competitiveness and livelihoods for the industry.
	Louisiana Community and Technical College System (LCTCS)	Discussed key educational needs in the State (e.g., tutoring, access to unique classes), to what extent improved access to broadband internet would address these needs and any further investments that could be helpful.
	Calcasieu Parish School Board	Discussed detailed view of educational needs in rural areas and how virtual tools (e.g., virtual tutoring, access to remote classes) could address these needs.
	Louisiana State University (LSU) Center for Energy Studies	Discussed potential resiliency investments and other opportunities to ensure reliable access to broadband (deprioritized)
	Louisiana State University (LSU) Health Office	Discussed rural health needs in the State and what opportunities telehealth could play in addressing them
<b>Private Businesses</b>	CLECO Power	Discussed potential resiliency investments and other opportunities to ensure reliable access to broadband (deprioritized)
	Blue Cross Blue Shield Louisiana	Discussed rural health needs in the State and what opportunities telehealth could play in addressing them
<b>Healthcare Associations</b>	Louisiana Managed Medicaid Association	Discuss rural health needs in the State and what opportunities telehealth could play in addressing them
	Louisiana Primary Care Association	Discussed rural health needs in the State and what opportunities telehealth could play in addressing them
	Louisiana Managed Care Organizations	Held roundtable with representatives from multiple Louisiana Managed Care Organizations to discuss rural health needs in the State and what opportunities telehealth could play in addressing them

*Plan for stakeholder engagement going forward*

Going forward, as part of the Subgrant process, we expect State Agencies to engage communities in the ultimate use of funds. They have already expressed a variety of ways to do so. These methods include:

- Communicate through digital channels (e.g., social media channels, webinars)
- Partner with local community groups
- Develop and execute joint programs (e.g., outreach events, informational sessions)
- Host educational workshops and training programs
- Utilize regional agents in rural areas

**D. Analysis of Most Effective Use of Non-Deployment Funds**

**Any efforts the Eligible Entity undertook to determine whether other uses of the funds might have been more effective in achieving the BEAD Program’s equity, access, and deployment goals.**

*Process for assessing non-deployment activities*

The State’s investment areas were assessed using a detailed, data-driven process, coupled with deep stakeholder engagement, that holistically considered uses of funds that could be effective in achieving the BEAD program’s equity, access, and deployment goals. Based on this process, The State identified investment areas that address the needs of Louisianans in the state, particularly in rural and underserved areas.

First, the State conducted a rigorous assessment of the current challenges across the state to identify potential areas to address. It reviewed macroeconomic performance, firm competitiveness, human capital and quality of life metrics, innovation, infrastructure and the business climate in the state. Through this process the State cataloged a robust list of potential equity and access challenges to address (e.g., low workforce participation, declining productivity, poor rural healthcare access). For each of these challenges, the State assessed whether there were potential programs that could be addressed by better access to internet and to what extent these challenges were present across the State and particularly in vulnerable areas.

Next, the State identified key strategic pillars that aligned with other priorities within the Government- this was to ensure that there would be multiplier effects on investment and that any BEAD dollars would be supportive and coordinated with other State priorities. Three strategic pillars were developed: 1) Drive economic competitiveness in Louisiana, 2) Train Louisianas for Digital Jobs, 3) Deliver a healthy community to all Louisianians.

During a robust stakeholder engagement process (see Q8.9 above for additional details), we assessed 20+ potential State Agencies as recipients for BEAD non-deployment funding through a multi-part framework. 1) Were there areas of investment compliant with BEAD non-deployment uses of funds, 2) Would their potential areas of investment achieve significant impact for Louisianian residents in line with our 3 strategic pillars, 3) Would they have the operational capacity to implement and oversee any funding that was provided to them. Based on those 3 criteria we selected the ultimate list of 11 programs identified above.

#### *Additional fair assessment considerations*

ConnectLA feels confident that given the rigorous data-driven approach to non-deployment activity selection, supplemented with State Agency input and feedback, the State has chosen areas that will lead to impact for Louisianians. By selecting activities based on the key needs of the state and also leveraging State Agency expertise in project selection the ultimate activities selected will both be relevant and impactful and structured to be effective uses of funds.

ConnectLA has allocated non-deployment funding based on the reach and impact of the selected awards. The expectation is that each agency will be able to effectively draw down its allocation, but if for some reason there is funding available, the State will assess what its best and highest use will be in coordination with the partnering State Agencies.

ConnectLA has consistently been in touch with NTIA to check and test hypotheses emerging from stakeholder conversations. Activities selected have been shared with NTIA over time to ensure effectiveness and relevance to BEAD program equity, access, and deployment goals. Proposed activities that do not fit BEAD's goals have been deprioritized based on feedback from NTIA.

### 8.9 Non-Deployment Subgrantee Selection Process – Scoring Process

**If 'No' [to Intake Question 8.4], describe how and whether the scoring process to select non-deployment projects was or will be conducted in a competitive manner consistent with (1) the BEAD NOFO requirements and (2) the description within the approved Initial Proposal.**

### *Alignment of scoring criteria with BEAD NOFO requirements*

In line with the BEAD Notice of Funding Opportunity, ConnectLA will consider supporting several non-deployment activities related to the following list of potential uses, in addition to other uses that similarly seek to reduce the digital divide and promote access, adoption, and equity by leveraging improved broadband networks. Additionally, ConnectLA will abide by BEAD’s guidance to “promote participation by minority-owned businesses and other socially or economically disadvantaged individual-owned businesses” by instituting an equity-focused scoring rubric – see Scoring system for non-deployment projects in BEAD program subsection in 8.9 and 8.10 rubric for additional detail.

List of suggested potential uses:

1. User training with respect to cybersecurity, privacy and other digital safety matters.
2. Remote learning or telehealth services/facilities.
3. Digital literacy/upskilling (from beginner level to advanced).
4. Computer science, coding and cybersecurity education programs.
5. Implementation of Eligible Entity digital equity plans (to supplement, but not to duplicate or supplant, planning grant funds received by the Eligible Entity in connection with the Digital Equity Act of 2021).
6. Broadband sign-up assistance and programs that provide technology support.
7. Multi-lingual outreach to support adoption and digital literacy.
8. Prisoner education to promote pre-release digital literacy, job skills, online job acquisition skills, etc.
9. Digital navigators.
10. Direct subsidies for use toward broadband subscription, where the Eligible Entity shows the subsidies will improve affordability for the end user population (and to supplement, but not to duplicate or supplant, the subsidies provided by the Affordable Connectivity Program).
11. Costs associated with stakeholder engagement, including travel, capacity-building or contract support.
12. Other allowable costs necessary to carrying out programmatic activities of an award, not to include ineligible costs described in Section V.H.2 of the NOFO.
13. Activities related to the incorporation of “smart” technologies and capabilities into farming practices, due to Louisiana being a heavy agriculture-producing state and the unique competitive advantage of spearheading specific smart technologies in this sector

### *Alignment of scoring criteria with Initial Proposal*

The scoring process will be conducted in line with the scoring criteria for non-deployment activities listed in the Initial Proposal, which outlines the following process:

- **Announcement and Public Notice:** Louisiana will announce the availability of funding for eligible non-deployment activities through various channels, such as the program website, press releases and public notices. This announcement will include detailed information about the application process, eligibility criteria and evaluation criteria. Notice will be made available for at least a 60-day period.
  - **Eligibility Screening:** Louisiana will conduct an initial screening of the applications to determine their eligibility based on the criteria outlined in the program guidelines. This screening will ensure that the applicants meet the basic requirements for participation.
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- **Evaluation Criteria:** Louisiana will develop a set of objective evaluation criteria that will be used to assess the applications, that will be tailored to an individual subgrant program, as needed. For each subgrant program, these criteria will be established in advance and communicated to all potential applicants. Examples of evaluation criteria may include the project's potential effect on broadband availability, the feasibility of the proposed activities, the strength of the project management plan and the applicant's capacity to implement the project successfully. Where needed, traditional and non-traditional state procurement processes will be followed. Priority will be considered for the following: Louisiana will prioritize applicants with effective models for addressing the existing skill gaps in our labor force as well as other workforce training and readiness programs, including those that provide equitable instruction and outreach to all working-age individuals.
- **Review Panel:** Louisiana will convene a review panel comprising subject matter experts, industry professionals and other relevant stakeholders, including “lived experts” such as affected residents, representatives from community anchor institutions or community leaders from faith-based, business based and non-profit organizations. The panel members will have the necessary expertise to evaluate the applications based on the predetermined evaluation criteria. Panel members will be required to disclose any conflicts of interest that may arise from their participation in the process. ConnectLA will ensure that appropriate steps are taken to prevent bias, collusion, arbitrary decisions and any other factors that could undermine the process. If any impropriety is identified, ConnectLA will work with state attorneys to ensure appropriate actions are taken, the issue is mitigated, and any awarded funds are rescinded or clawed-back.
- **Evaluation Process:** The review panel will individually review and evaluate each application based on the established criteria. They may use a scoring system or a qualitative assessment to ensure consistency and objectivity in the evaluation process. Appropriate steps will be taken to ensure a fair and transparent evaluation process with objective scoring criteria. The scoring criteria and evaluation process will be documented through a variety of methods in advance of utilization.
- **Transparency and Public Input:** The subgrantee selection process will be transparent, with clear communication throughout. Louisiana will publish the list of selected subgrantees on their website, along with a summary of the evaluation process.
- **Appeals/Protest Process:** Louisiana will establish an appeals process that allows applicants to seek a review of the selection decision if they believe there were procedural errors or inconsistencies in the evaluation process. The protest process, official decisions and provider appeals shall be conducted in accordance with La. R.S. 51:2370.27(F) and 2370.28. The period for protesting an award shall not exceed seven days from the announcement of awards. The appeals process will provide a fair opportunity for applicants to present their case, and a separate review panel or independent entity may be involved in the appeal evaluation.

*Scoring system for non-deployment projects in BEAD program*

The following scoring framework will be used to evaluate subgrantees for all non-deployment programs, with some tailoring for individual programming, as needed. The only divergence from the Initial Proposal scoring system is replacing the ‘Effect on Broadband Availability’ category with ‘Expected Impact’. This adjustment had been made as ConnectLA’s proposed broadband projects will seek to leverage BEAD non-deployment funding to complement and support BEAD’s digital equity goals, rather than solely focusing on increasing broadband availability itself.

- **Expected Impact (30 points):** Evaluate the potential effect of the proposed activities in meeting BEAD’s strategic goals (e.g., equitable access to reliable broadband, broadband affordability, adoption and usage amongst communities, job creation and economic growth, and federal, state, local, and private collaboration to ensure broadband impact). Consider factors such as the number of jobs created, number of local businesses supported, improved learning / healthcare outcomes, as well as equity considerations (e.g., location within economically disadvantaged areas, approach for targeting underserved populations. This dual approach will holistically capture the overall significance of the project in addressing the digital divide.
- **Feasibility and Viability (25 points):** Assess the feasibility and viability of the project. Consider the technical and operational aspects, including the proposed timeline, budget and resources required for successful implementation. Evaluate the applicant's capacity to carry out the project effectively, including their track record, partnerships and relevant experience. Specifically, Louisiana will ensure that prospective subgrantees have the competence, managerial and financial capacity to meet the commitments of the subgrant and any requirements of the program, as well as the technical and operational capability to provide the services promised in the subgrant in the manner contemplated by the subgrant award. Specific requirements, at a minimum, included in the BEAD NOFO, page 73, include the following:
  - Financial capability including certification applicant is financially qualified, letter of credit or performance bond (as consistent with NTIA’s Limited Waiver requirements) as applicable to non-deployment subgrant awards, audited financial statements, sustainability/business plan.
  - Managerial capability, including resumes for key individuals and narrative describing experience and readiness to carry out the project.
  - Technical capability, including certification that the applicant is technically qualified to complete and operate the project and detailed project plan.
  - Compliance with laws including demonstrating ability to comply with all applicable laws.
  - Operational capability including appropriate certifications or attestations to operational experience.
  - Ownership information as described.
  - Other public funding including disclosure of other broadband deployment projects
- **Project Management Plan (20 points):** Evaluate the quality of the project management plan presented by the applicant. Consider the clarity and comprehensiveness of the plan, including objectives, milestones, deliverables and risk mitigation strategies. Assess the applicant's ability to execute the project efficiently and effectively.
- **Partnerships and Collaboration (15 points):** Assess the strength and relevance of the applicant's partnerships and collaborations. Consider the involvement of local community organizations, government entities, educational institutions and other stakeholders. Evaluate how these partnerships contribute to the success and sustainability of the project.
- **Budget and Cost-Effectiveness (10 points):** Evaluate the proposed budget and cost-effectiveness of the project. Assess the reasonableness of the budget in relation to the proposed activities and expected outcomes. Consider the cost-effectiveness of the project in terms of the number of beneficiaries and the expected impacts.



- Additionally, ConnectLA will conduct a legal process to determine whether subgrantees are capable of carrying out activities funded by the subgrant in a competent manner in compliance with all applicable federal, Eligible Entity, and local laws.

#### 8.10 Non-Deployment Subgrantee Selection Process – Scoring Rubric

**If 'No' [to Intake Question 8.4], submit the rubric(s) the Eligible Entity has used or intends to use for its non-deployment Subgrantee Selection Process.**

See Exhibit H for Subgrantee Selection Rubric.

*Note: Agencies may adjust rubric categories with ConnectLA permission.*

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## Section 10 Participation of Non-Traditional Broadband Providers (Requirement 10)

### 10.1 Efforts Taken to Ensure Participation of Non-Traditional Broadband Providers

**Describe efforts taken to ensure participation of non-traditional broadband providers such as municipalities or political subdivisions, cooperatives, non-profits, Tribal Governments, and utilities.**

Louisiana decided not to waive the Local Government Fair Competition Act as it does not exclude, as a class, any type of broadband provider from eligibility as a subgrantee, remaining consistent with the Infrastructure, Investment and Jobs Act. Though not restrictive, the IJA often deters local governments from becoming involved. To mitigate this, Louisiana passed HB 653 which created the GUMBO 2.0 program, allowing the state to administer the federal Bipartisan Infrastructure Law. The new law provided the ConnectLA office the authority and responsibility to create state rules and scoring to administer funds, provided they comply with federal infrastructure law, state law and guidance.

As noted, Louisiana has decided not to waive the Local Government Fair Competition Act as it does not exclude, as a class, any type of broadband provider from eligibility as Louisiana utilized a subgrantee selection process that is competitive, inclusive of broadband providers of all types and based on the objective criteria established both by the IJA and NTIA in the BEAD NOFO. Regardless of whether applicants are traditional or non-traditional broadband providers, they were subject to the same subgrantee qualification requirements evaluating demonstrated experience, technical ability and financial wherewithal to meet the BEAD program requirements and deliver the services promised. Similarly, all applicants were subject to the same selection criteria, which prioritized applicants that propose affordable service, demonstrate a commitment to fair labor practices and commit to timely deployment of new networks.

Since the approval of IPv2, Louisiana has conducted numerous outreach efforts to ensure a variety of broadband providers, both traditional and non-traditional, were aware of the program and prepared to participate, if they so wished. To satisfy diverse engagement metrics and reach covered populations throughout the state, ConnectLA implemented a multi-faceted approach to engagement wherein the needs of individuals were met. Strategies included statewide stakeholder meetings in each major region of the state to ensure full geographic coverage, working closely with statewide associations representing local governments – including the Louisiana Municipal Association, the Louisiana Police Jury Association, and the Louisiana Association of Planning and Development Districts – the use of a variety of communication channels, the development of a robust list of contacts of stakeholders, the development of a comprehensive library of resources, frequent and consistent publication of updates around BEAD funding, leveraging earned media to provide public updates, and partnerships with key entities and organizations throughout the state. For more details of outreach efforts, see Section 5 above.

### 10.2 Subgrantee Selection Rounds Locations [Attachment]

**Provide the following counts for all subgrantee selection rounds to serve locations consistent with the requirements of Section IV.C.1.a of the BEAD NOFO:**

- a. **Total number of unique applicants**
  - b. **Total number of unique non-traditional broadband provider applicants**
  - c. **Total number of Municipalities or political subdivisions**
-

- d. Total number of Cooperatives
- e. Total number of Non-profits
- f. Total number of Tribal Governments
- g. Total number of Utilities
- h. Other

Applicants	Pre- Qualification	Round 1	Round 2	Direct Negotiation
Unique applicants	31	25	25	22
Unique non-traditional broadband provider applicants	0	0	0	0
Municipalities/political subdivisions	1	1	1	0
Cooperatives	0	0	0	0
Non-profits	0	0	0	0
Tribal Governments	1	0	0	1
Other	0	0	0	0
<b>Totals</b>	<b>33</b>	<b>26</b>	<b>26</b>	<b>23</b>

### 10.3 Competing Proposals from Non-Traditional Broadband Providers

**In every instance in which the Eligible Entity received one or more competing proposals from non-traditional providers competing with traditional providers to serve the same location(s) consistent with the requirements of Section IV.C.1.a., was the highest-scoring applicant selected as the subgrantee?**

Yes, ConnectLA followed the subgrantee selection process, as set forth in IPv2, Section 2.4, when reviewing submitted applications to select subgrantees. The highest-scoring applicant was selected.

### 10.4 Competing Proposals from Non-Traditional Broadband Providers

**If the highest-scoring applicant was not selected as the subgrantee in every instance in which the Eligible Entity received applications from traditional and non-traditional providers for the same location(s), explain why.**

N/A.

## Section 11 Labor Standards and Protection & Middle-Class Affordability Plans (Requirement 11 & 17)

### 11.1 Reducing Costs and Barriers to Deployment

**Provide the implementation status of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment, including description of specific steps taken since the submission of the Initial Proposal. Responses may include, but are not limited to, the following:**

ConnectLA plans to assist with the coordination of the subgrantees with state, parish and local municipalities and will host quarterly state permitting meetings involving agencies like DOTD and Louisiana 811 to streamline the permitting process on the state-owned rights of way. Additionally, Connect LA will be assisting in obtaining available existing GIS data. The local department of public works agencies or courthouses will be contacted for any available as-built information. This as-built information will be confirmed in the field with any local maintenance representatives. These as-builts will be provided to the contractor and compared against LA 811 in field marks. Current and historical aerial imagery will be used to locate any manholes, catch basins, valves, hydrants, etc. that are visible to begin mapping the project work zones for existing utilities. GIS layers (if available) will be reviewed and compared to maps that have been compiled.

Subgrantees will be required to provide their intended fiber installation route to determine if route is the path of least chance of damage. If required, ConnectLA will initiate its own 811 to allow for the locate process to begin and confirm any available utility data. Special attention will be given to pipeline crossings and other hazardous locations.

#### A. Use of Existing Infrastructure

##### **Promoting the use of existing infrastructure;**

To promote the use of existing infrastructure, DOTD will allow only one conduit or single-multi-strand fiber optic cable per location in its right-of-way, depending on width availability. The conduit or cable will be expected to be large enough to facilitate multiple providers. The company installing the conduit will be required to allow competitors access, ensuring future growth and competition.

#### B. Dig-Once Policies

##### **Promoting and adopting dig-once policies;**

Although the state does not have a dig-once policy, other mechanisms across state government ensure coordination and work to remove the duplication of efforts of utilities and other infrastructure co-locating in the right-of-way. Broadband providers are required to coordinate with DOTD to place telecommunications infrastructure within the public right of way. These efforts may lead to coordinated and streamlined deployment, across multiple sectors requiring right-of-way-based infrastructure. Based on the Federal Mobile Now Act, DOTD implemented a Broadband Infrastructure Deployment Policy that allows broadband providers to receive information about publicly funded state roadway construction. A list of projects can be found on DOTD's Broadband page<sup>9</sup>. Broadband providers are required to coordinate with DOTD to place telecommunications infrastructure within the public right of way. This aids in the planning and deployment of broadband facilities. Another strategy to be employed includes the quarterly permitting council. Its members include individuals from the telecommunications industry, municipal and

police jury associations and the Office of the Governor. The aim of these meetings is to increase interagency coordination and communication for construction projects.

C. Promoting and adopting dig-once policies;

**Streamlining permitting processes;**

ConnectLA will host quarterly state permitting meetings involving agencies like DOTD and Louisiana 811<sup>10</sup> to streamline the permitting process on the state-owned rights of way. ConnectLA will work with state agencies and stakeholders to ensure that common forms and processes, resources for local permitting and standardized project descriptions are made known to all involved parties. On the local level, ConnectLA will work with local governments to establish procedures to streamline the local permitting process for BEAD-funded projects, as well as ensuring all NEPA and Section 106 requirements are followed on the federal side, Louisiana strongly encourages NTIA to work with other relevant federal agencies and issue coordinated requirements and guidelines to all relevant permitting offices to ensure that any federal permits needed for BEAD-funded projects are expedited and streamlined and that reasonable maximum periods be set, after which permits will be deemed automatically granted if an office has not yet acted.

D. Cost-Effective Access to Poles, Conduits, Easements

**Streamlining cost-effective access to poles, conduits, easements; and**

The current fee structure for use of highway rights-of-way for utility operators used by DOTD is derived from the Louisiana Administrative Code and charges permit fees based on the number of customers served or the number of parishes in which facilities are located, rather than on a permit-by-permit basis. The fees are designed to recoup the cost incurred by DOTD in reviewing, processing, approving and monitoring permits. To address the issue of reducing costs and barriers to deployment, DOTD will review and update its permit fees to ensure they are reasonable and cover the cost of reviewing, processing, approving and issuing permits. DOTD will strive to process permit applications efficiently, particularly for standard installations that meet industry standards so as not to impact the long-term operation or maintenance of roadways.

E. Rights of Way

**Streamlining rights of way, including the imposition of reasonable access requirements.**

Roadways are accompanied by Rights of Way which can be advantageous to broadband expansion efforts. Instead of securing land easements for every property, efforts are streamlined by building in the public ROW. Louisiana's local roadways make up the majority of the total miles as depicted in the Table below.

Interstate Miles	U.S. Hwy Miles	LA Hwy Miles	Local Miles	Total Miles
943.69	2,284.83	13,243.58	44,681.61	61,153.71

DOTD manages the remaining roadway miles and is a significant partner in broadband deployment. In order to streamline the process, House Resolution 155 was passed during the 2023 Regular Session of the Louisiana Legislature to create a committee to study the barriers to deploying broadband across public and private property. The committee is to report its findings, along with proposed legislation to remove barriers to deployment across public and private property to the House of Representatives no later than forty-five days prior to the convening of the 2024 Regular Session of the Louisiana Legislature.

## 11.2 Labor Activities

**Provide the Eligible Entity's implementation status of plans described in the approved Initial Proposal Requirement 11 related to labor activities, including a description of specific steps taken and how the Eligible Entity implemented and applied the labor-related criterion in its Subgrantee Selection Process. Responses must include a description of how subgrantees' record of and plan to comply with federal labor and employment laws was weighed in the competitive Subgrantee Selection Process.**

### A. Past Compliance with Federal Labor and Employment Laws

**Prospective subgrantees' record of past compliance with federal labor and employment laws;**

ConnectLA required information on the prospective subgrantees' record of compliance with federal labor and employment laws, as well as the records of any other entities participating in the project, including contractors and subcontractors. During pre-qualification Connect LA required an attestation that the prospective subgrantee has complied with all federal, state, and local laws for previous broadband projects such as those funded by GUMBO 1.0, RDOF, et al. The compliance records and plans were scored as primary criteria as provided in IPv2 Section 2.4.2.1.

### B. Ensuring Compliance with Federal Labor and Employment Laws

**Prospective subgrantees' plans for ensuring compliance with Federal labor and employment laws; and**

ConnectLA continues to work with LCTCS, LWC and unions, to prioritize the buildup of a workforce to construct and maintain broadband networks. ConnectLA required prospective subgrantees to submit a written plan for ensuring compliance with federal labor and employment laws, during the pre-qualification period. These plans addressed, as a baseline requirement, how the applicant will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including (1) information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network and (2) how the applicant will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

### C. Commitment Plans for Federal Labor and Employment Laws

**Prospective subgrantees' plans for committing to strong labor standards and protections for the project workforce (including contractors and subcontractors) and how these plans will be incorporated into binding legal commitments.**

ConnectLA required subgrantees to provide Federal Labor and Employment Compliance policy documents into their applications as dictated by the BEAD NOFO and as directed in Louisiana's Initial Proposal Volume II. These items will not be included in legally binding commitments, but instead were utilized as criteria in the subgrantee selection process. To ensure subgrantees' plans to commit to strong labor standards and protections for the project workforce, ConnectLA required applicants, in the pre-qualification period, to submit detailed plans to use an appropriately skilled and credentialed workforce, including details on the credentials required.

ConnectLA does not plan to incorporate any of the following items into legally binding commitments for subgrantees (including contractors and subcontractors) outside of what is explicitly required in the BEAD NOFO. Items in the NOFO include:

- Using a directly employed workforce, as opposed to a subcontracted workforce.
- Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon and Related Acts requirements, where applicable, and collecting the required certified payrolls.
- Use of local hire provisions.
- Commitments to union neutrality.
- Use of labor peace agreements.
- Use of an appropriately skilled workforce (e.g., through registered apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded).
- Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification and licensure).
- Taking steps to prevent the misclassification of workers.

ConnectLA required potential subgrantees to incorporate these items into their application as dictated by the BEAD NOFO and as directed in ConnectLA’s Initial Proposal Volume II. These items were utilized as criteria in the selection process.

ConnectLA has ensured subgrantees are aware of these regulations prior to and throughout the selection process by conducting regulations information webinars, posting a list of regulations on the ConnectLA’s website, and including the requirement in grant application guides, grant applications, grant agreement terms/conditions, and subrecipient grant monitoring program requirements.

### 11.3 Workforce Development

**Provide the implementation status of plans described in the approved Initial Proposal Requirement 12 related to workforce development, including a description of specific steps taken since the submission of the Initial Proposal.**

#### A. Safe and Effective Environment for Skilled Workforce

To ensure we meet the workforce needs, ConnectLA required applicants to develop a plan for a highly skilled workforce to include the following:

1. The ways in which the applicant will ensure the use of an appropriately skilled workforce, e.g., through required registered apprenticeships or joint labor-management training programs that serve all workers.
2. The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and relevant pre-existing occupational training, certification, and licensure.
3. Incentivizing projects, through scoring rubric, based on apprenticeship utilization percentages in Economic Disadvantaged Areas. As part of the state subgrant program, “Economically Disadvantaged” Sub Project Areas (ED-SPAs) will be designated for increased scrutiny, with the possibility for higher funding or higher points for applications that include them. More information related to process and scoring can be found in IPv2 Section 2.4.2.1

4. LA Workforce Commission, in partnership with the local community colleges, will hold job fairs where ConnectLA will send a representative. The goal is to host the job fairs every 6 months to align with academic calendars.
5. Marketing and Engagement plan to inform, communicate and reach out to covered populations as prioritized in the state's Digital Equity Plan.

Required participation in quarterly industry/ConnectLA meetings to discuss workforce efforts, barriers and tactics to drive participation in the industry – to include secondary education representatives – meetings will be led by the ConnectLA executive director in partnership with LCTCS and LWC. In an effort to monitor and measure the success of the programs LCTCS has created a dashboard, ConnectLA will work with LCTCS to incorporate new metrics as determined feasible.

Subgrantees are required to carry out the proposed work (including contractors and subcontractors), a description by job title of safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles; and information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard. To ensure that an applicant complies with occupational safety and health requirements, applicants are required to allow workers to create worker-led health and safety committees with which management will meet upon reasonable request.

To meet these standards, ConnectLA has partnered with the Louisiana Workforce Commission and The Louisiana Community and Technical College System to develop workforce training and apprenticeship programs. Apprenticeships are a federally regulated program and LWC is the state-administrator. LWC's role is to match state apprentice seekers and participants to help support them. Apprenticeships typically last one or more years and require individuals to have at least 2,000 working hours for completion. Upon completion of the program, the worker receives a certificate of completion that is transferable to other states.

Other methods to meet workforce training standards include partnerships with the Louisiana Workforce Commission, Louisiana Economic Development's FastStart® program and the Louisiana Community and Technical College System, detailed throughout our Initial Proposal. Additional insight into workforce development needs will be supplemented through increased outreach to potential populations through engagement efforts related to the Digital Equity Plan. By including these potential workforce needs through outreach efforts, Louisiana will ensure that opportunities are made available to those who are most in need. To support locally owned service providers with their growth and expansion, where practical, ConnectLA will also work with and leverage Louisiana Economic Development's award-winning FastStart program for workforce development. Recognized for its innovation, effectiveness, flexibility and efficiency, LED FastStart® is the nation's best state workforce training program, according to Business Facilities magazine. FastStart® provides customized employee recruitment, screening, training development and training delivery for eligible, new or expanding companies — all at no cost. Based on a company's immediate and long-term workforce needs, the FastStart team crafts unique programs that ensure high- quality, flexible workers are prepared on day one and beyond. To date, no ISPs have registered to participate in an apprenticeship program; however, ConnectLA is working with LWC to market the benefits of such a program. If a company has an apprenticeship in another state, ConnectLA will work with LWC and the ISP so that it can be quickly adapted to be used in Louisiana. LED's FastStart

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program will also be leveraged to create an additional pathway to develop potential apprenticeships. Working to address the digital divide will take all ISPs', big and small to ensure universal coverage. In a survey conducted by BCG with 17 ISP responses, it was discovered that there is a contract and direct-hire labor shortage. Operators are faced with uncertainty regarding their long-term labor strategies due to the tightening of the local labor market and price increases, currently they are relying heavily on contractors to satisfy their staffing needs. It is anticipated that the market will tighten further as a result of the buildout driven labor demand growth.

LWC is partnering with Coursera to launch Tech Ready Louisiana, a statewide workforce development initiative providing free career training to thousands of Louisianians. About 4,000 residents have enrolled in more than 12,000 courses or projects and received industry standard certifications. The program includes Career Academy from Coursera, which prepares workers – even those without a college degree or prior work experience – for over 30 in-demand digital careers in roughly six to eight months when studying part-time. Louisianians can explore careers, develop key skills and competencies, build a portfolio of hands-on projects using actual workplace tools and earn industry-recognized credentials from Google, IBM, Meta, Salesforce, HubSpot and Intuit to help them land good jobs. Many of these credentials have ACE Credit Recommendation, which makes it easier for learners to earn credit toward a local degree program for the eligible certificates they complete.

In addition, LWC also offers its American Job Centers for people to access the online training if reliable internet access at home is an issue. There are almost 60 American Job Centers and affiliate sites throughout the state available for people to come in and use reliable internet to complete these courses. With the pace of digital transformation, many traditional university degree and workforce development programs often lack a strong connection to today's in-demand jobs, the fast-changing skills landscape and evolving employer expectations. This program will assist residents in building stronger relationships between their college and career development programs and top companies, higher education and government systems can unlock new career opportunities for students and workers, diversify and expand talent pipelines for employers and build a competitive state workforce to support the local economy.

It is anticipated that expansion of broadband networks and increased broadband adoption through the BEAD program will create permanent, long-term positions to operate, maintain and serve customers over the new networks. To address and support future program needs LCTCS estimates that it will need \$30 million in BEAD funds to support not only program delivery and instruction but also to purchase necessary equipment for training.

#### **B. Supporting Wrap-Around Services for Workforce**

As part of the apprenticeship program, LWC will assist by utilizing one of its jobs on the Mobile Workforce Center. Each center is equipped with 13 computer stations and internet access, making it the perfect tools for not only employers but colleges to help with onsite recruitment and hiring events. LWC is able to spend up to \$50,000 per program for support services. As part of these support services, they can provide up to \$1,000 per apprentice per year on items such as uniforms, laptops, training software, and other essential elements to ensure timely completion of the apprenticeship program.

The Louisiana Department of Education provides the Child Care Assistance Program to low-income families while they are working or attending school. This program will be marketed to individuals who are participating in an apprenticeship program with LWC, attending one of the fiber optic training programs

that was launched within the LCTCS system, or any other programs related to broadband workforce development. To support all families in accessing high quality childcare, CCAP provides financial assistance to low-income families while they are working or attending school. Families are eligible for CCAP if:

- The child needing care is a US citizen or an eligible alien residing in the state of Louisiana.
- Parents or legal guardians meet one of the following requirements:
  - Works at least 20 hours a week
  - OR attends an accredited school or a training program as a full-time student
  - OR attends an accredited school or a training program at least 20 hours a week
  - OR attends a combination of work and school
  - OR is actively seeking work
  - OR participates in a transitional living program
  - OR receives disability income
  - OR is experiencing homelessness

The Louisiana Department of Health provides mental health resources for citizens and workers, while the Board of Regents provides critical skills such as digital literacy, skilling and financial literacy education.

The Department of Children and Family Services administers the Strategies to Empower People program. The STEP Program helps work-eligible families receiving cash assistance through the Family Independence Temporary Assistance Program move toward obtaining employment through job training, skills development and support services. STEP coaches help participants develop a job readiness plan that looks at basic skills, needs and interests to help them get a job. ConnectLA anticipates working with the DCFS to leverage this program to direct these at-risk families toward training opportunities and wraparound services so that they have greater access to these high-paying jobs. Participants in the STEP Program are provided supportive services to enable them to participate in various work activities and to progress toward self-sufficiency. Wrap-around services include:

Service Provided	Source of Service
Job fairs, resume, and application assistance	Louisiana Workforce Commission
Mental health resources	Louisiana Department of Health
Digital skills and adoption training	Louisiana Board of Regents
Financial literacy education	Louisiana Board of Regents
Childcare	Louisiana Department of Children and Family Services; Louisiana Department of Education
Transportation	Louisiana Department of Children and Family Services
Eyeglasses	Louisiana Department of Children and Family Services; Louisiana Department of Health
Hearing aids	Louisiana Department of Health
Medical exams	Louisiana Department of Children and Family Services; Louisiana Department of Health
Uniforms, clothing, safety equipment, training materials	Louisiana Department of Children and Family Services; Louisiana Workforce Commission
Grocery and food assistance	Louisiana Department Children and Family Services

To build a relationship with organized labor, ConnectLA collaborated with CWA Local 3411 and had their president speak at the inaugural Broadband Solutions Summit. The office is also working to incentivize fair labor practices by scoring on past legal compliance, future compliance commitments, and detailed plans to follow the BEAD NOFO.

Continuous engagement between internet service providers, telecommunication companies and contractors will continue to inform the instructional design of the broadband training programs, which leads to a highly skilled workforce. ConnectLA will use advisory boards to facilitate engagement between relevant stakeholders. Advisory boards will serve as the sounding board to validate skills required for employment now and into the future.

In 2023, LCTCS started a broadband marketing campaign to increase awareness about the broadband programs its campuses offer across the state. Their marketing strategy includes social media posts, search engine optimization, YouTube and Persona Targeting/Retargeting. Some of the objectives of the marketing campaign are to generate new leads, gain more website/microsite traffic and develop a social media presence around broadband. After the marketing campaign was in place for 30 days, they evaluated to see how well it was working and discovered that they had generated 456 leads (37% of these leads are women) and reached 606,646 individuals. As part of their strategic plan, they have identified both short- and long-term goals to further broadband awareness. The goal over the next year is to:

- Establish a regional advisory board to scale out apprenticeships, all women cohort trainings and joint labor management partnerships.
- Create credentials or identify credentials to add to the State IBC list to create opportunities for dual enrollment and jumpstart summer camps gear toward on-ramp credentials for telecommunications careers.
- Have colleges present new programs to WIOA boards for the creation of on-the-job training to re-skill the unemployed and underemployed populations.

### C. Maintaining Worker Voice in Project Planning and Implementation

ConnectLA's work with entities such as LWC, LCTCS, and Communications Workers of America has assisted the office in determining how to ensure fair labor standards and protections in grant agreements and audit service providers in maintaining these standards. Throughout implementation of GUMBO 2.0, the Office will continue to ensure fair labor standards and protections are ensured and practiced by award winners.

Training and education play a significant role in recruiting diverse populations using educational promotions, apprenticeships, classroom environment (diverse instructors) and flexibility in training for adult learners with jobs, childcare demands, or elderly care responsibilities. Providing access to these support services is critical to providing access to training programs that serve as a bridge into broadband careers. Currently, LCTCS offers sixteen training programs related to broadband jobs, including telecommunications programs for those students seeking less labor-intensive jobs and broadband infrastructure programs for those students seeking more skilled craftsmanship jobs. To create equitable on-ramps into broadband-related jobs for at-risk populations, ConnectLA has continued to work with LCTCS to develop earn-while-you-learn models that provide financial support through stipends for adult learners with real-world responsibilities such as working single parents who need income to support their

families while they seek to re-skill or upskill for better paying jobs. Additionally, ConnectLA will partner with employers for job placement, as well as partner with government and community organizations that work with underrepresented populations such as WIOA Title IV providers. Throughout the process of workforce development implementation strategies, the state will continue to identify mechanisms and partnerships that will ensure the overall goals stated within the plan.

To maintain worker training and continuing education, ConnectLA will work with previously identified stakeholders and state partners to engage internet service providers, contractors and other interested parties. This engagement and coordination will continue to inform the instructional design of the broadband training programs, leading to continued development and expansion of Louisiana's highly skilled workforce. As part of this initiative, ConnectLA will continue to use advisory boards to convene and facilitate the engagement between relevant stakeholders to ensure validation of the skills required for employment now and into the future. Moving forward ConnectLA plans to conduct job fairs in partnership with local community colleges and Louisiana Workforce Commission every 6 months.

#### D. Ensuring Availability of Jobs and Funding to Diverse Pool of Workers

ConnectLA will conduct outreach to, and recruitment through job fairs in partnership with local community colleges and LWC of, populations that have traditionally been underrepresented in broadband and information technology jobs. As part of these recruitment efforts, ConnectLA will work with broadband service providers, LCTCS, LWC, Regional Planning and Development Districts, LED and other community non-profits and stakeholders to coordinate both in-person and virtual regional broadband job fairs and Informational sessions. A major thrust of these recruitment and engagement efforts will include a targeted marketing campaign to recruit women, persons of color, persons with disabilities and persons for whom English is not a first language.

ConnectLA will work with LCTCS' two minority-serving institutions to develop and expand their broadband workforce development programs. Both of these MSI's are located in large metropolitan areas of the state. Additionally, more than half of LCTCS's colleges serve a population of students who are majority low to moderate income students. These institutions have strong community partnerships and TRIO programs that support recruiting and retaining low-income, first-generation college students and students with disabilities. LCTCS diversity dashboard contains real-time enrollment demographic information for all programs. This dashboard will allow both ConnectLA and other stakeholders to track and monitor progress in building a diverse broadband workforce.

Through the award process, ConnectLA will prioritize applicants that hire local workers, implement robust and specific plans to recruit historically underrepresented populations facing labor market barriers, and are committed to ensuring reasonable access to job opportunities created by the applicant. ConnectLA will actively encourage applicants who actively recruit communities of color, women, persons with disabilities, LGBTQI+ people, disconnected youth, individuals in recovery, individuals with past criminal records, justice impacted and reentry participants and trainees participating receiving public assistance, and veterans and military spouses. To verify, the hiring of underrepresented populations, ConnectLA may require applicants to provide detailed plans on specific locations of where they will hire that affects underrepresented populations, or to provide statistics on where such hiring events were held, how many prospective job seekers attended, and how many were hired. This would maintain job seekers privacy, while also fulfilling the goal of measuring population data.

### ***Objectives for a Skilled and Credentialed Workforce***

To ensure that applicants and each of its contractors and subcontractors had the technical and operational capacity to carry out the project, ConnectLA required applicants to submit detailed plans for ensuring that the project workforce will be an appropriately skilled and credentialed workforce. ConnectLA analyzed these plans and weighed them for level of detail and execution applicability. Within the scope of a funded project, Project Workforce includes those employees of the applicant, its contractors or subcontractors directly engaged in the physical construction of the middle mile infrastructure, but it does not include support staff of senior management. The required workforce plan certified and addressed the following information:

- The ways in which the applicant will ensure the use of an appropriately skilled workforce, e.g., through registered apprenticeships or other joint labor-management training programs that serve all workers;
- The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and relevant pre-existing occupational training, certification and licensure;
- Whether the workforce is unionized;
- Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
- The entities that the proposed subgrantee plan to contract and subcontract with in carrying out the proposed work.

If an awarded project's workforce or any contractor's or subcontractor's workforce is not unionized, the project applicant was required to also provide with respect to the non-union workforce:

- The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce.
- For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
  - Safety training, certification and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles; and
  - Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

### **11.4 MBE, WBE, Labor Surplus Area Firms**

**Certify that all subgrantees selected by the Eligible Entity will be required to offer the low-cost broadband service option, as approved by NTIA in the Initial Proposal, for the duration of the 10-year Federal interest period.**

ConnectLA will leverage Louisiana's economic development and community-based advocacy ecosystems to increase awareness and accessibility to contracting opportunities related to the construction and maintenance of Louisiana's expanded broadband network. This ecosystem includes:

- Local, state and federal agencies (e.g., Small Business Administration, Minority Business Development Agency, LA Department of Transportation and Development, Various Municipalities)
- Small business technical assistance providers (Urban League of Louisiana, Louisiana Small Business Development Centers, Propeller, Thrive, SJB Group)
- Local, state, and regional economic development organizations (Louisiana Economic Development, GNO, Inc., North Louisiana Economic Partnership, New Orleans Business Alliance)
- Minority-serving institutions (Southern University - Baton Rouge, Southern University at Shreveport, Xavier University, Grambling State University)
- Other local colleges and universities (Tulane University, Louisiana State University, University of Louisiana at Monroe)
- Chambers of Commerce (Hispanic Chamber of Commerce of Louisiana, Louisiana Black Chamber Foundation, Greater Shreveport Chamber of Commerce)
- Faith-based organizations (Baptist Community Ministries, North Louisiana Jewish Federation, Franklin Avenue Baptist Church)
- Other business and industry-based organizations (Alliance for Economic Inclusion, Louisiana Associated General Contractors, Associated Builders & Contractors of Louisiana, Southern Region Minority Supplier Development Council)
- Other significant communities (including but not limited to Vietnamese groups, Filipino groups, impoverished Creole communities, LGBTQ+ organizations and businesses, etc.)

For example, ConnectLA will leverage the resources of Louisiana's robust entrepreneurial and small business development ecosystem to provide training, counseling and access to capacity-building resources for qualified women-owned, minority-owned, disadvantaged-owned and labor surplus area-owned businesses who seek to participate on broadband construction and maintenance contracting opportunities. ConnectLA proposes working with historically marginalized populations through organizations like the Black Chamber, and other faith-based community organizations.

To illustrate, the Urban League of Louisiana has a robust history in supporting African American and other under-served communities across Louisiana. As a part of its work to support equitable economic development in these communities, ULLA's Center for Entrepreneurship & Innovation is dedicated to ensuring the success of small businesses across the state with specific efforts to support women-owned, minority-owned and disadvantaged-owned firms. The work of the center is built upon the documented need for increased access to contracting opportunities, business development services and capacity-building resources for these diverse groups.

The CEI provides business education workshops, one-on-one and small group counseling, hands-on technical assistance and access to resources relevant to aspiring and existing entrepreneurs across various industries. The CEI includes the Women's Business Resource Center, the Contractor's Resource Center and the Small Business Support Services Center.

The Contractor's Resource Center was established in 2014 as an expansion of the Urban League's work in economic development and inclusion. The CRC works to provide resources to small, disadvantaged business enterprise certified, minority and women-owned contracting firms. Clients of the center have access to contractor-specific trainings and other support services, including bid prep, electronic

scheduling and estimating, project management, contract management and compliance, back-office administration, commercial licensing preparation, financing and bonding, etc.

To support ConnectLA’s Contractor Diversity Program, ULLA is well positioned to expand its Contractor’s Resource Center services to qualified women-owned, minority-owned, disadvantaged-owned and labor surplus area-owned businesses who seek to increase their operational and financial capacity to bid on state projects. In addition to the measures that ensure MBEs, WBEs and LSAs have a level playing field in applying for contract awards, ConnectLA will also develop a system to track key metrics on the inclusion of underrepresented enterprises throughout the process, including recruitment, grant applications, utilization and retainment.

### 11.5 Certification Related to Low-Cost Broadband Service

**Describe how the Eligible Entity has taken or will take all necessary affirmative steps to ensure minority businesses, women’s business enterprises, and labor surplus area firms are used, when possible, as per pages 88 – 89 of the BEAD NOFO.**

Yes. ConnectLA certifies that all subgrantees will be required to offer the low-cost service option, for the duration of the Federal interest period.

### 11.6 Climate Change and Resilience

**Provide the implementation status of plans described in the Eligible Entity’s approved Initial Proposal Requirement 15 related to climate change and resilience, including a description of specific steps taken since the Eligible Entity’s submission of the Initial Proposal.**

#### A. Initial Hazard Screening of Vulnerable Areas

Louisiana has developed an initial hazard screening, and the following parishes listed below have been identified as vulnerable to current and projected future weather and climate-related risks. The analysis will be reviewed for the inclusion of updated information on an annual basis, and a full screening analysis will be completed every five years.

Acadia	Lafayette	St. Landry
Bossier	Livingston	St. Martin
Caddo	Natchitoches	St. Mary
Calcasieu	Orleans	St. Tammany
East Baton Rouge	Ouachita	Tangipahoa
Franklin	Plaquemines	Terrebonne
Grant	Rapides	Tensas
Jefferson	Richland	Vermilion

### MITIGATING CLIMATE RISK TO LOUISIANA’S BROADBAND INFRASTRUCTURE

Relying on state data from the hazard mitigation plan and the coastal master plan and federal tools such as FEMA’s National Risk Index and NOAA’s Climate Explorer, Louisiana will employ strategies designed to avoid, minimize or mitigate the climate risks to broadband infrastructure deployment. The state will also rely on its disaster management and recovery experience to ensure that broadband service operability is integrated into community and electric utility resilience, response and recovery plans.

## LEVERAGING DATA TO MAKE INFORMED DECISIONS

The first step to avoid, minimize or mitigate the climate exposure to broadband infrastructure investments in the state's approach will be to leverage risk data to evaluate existing and new fiber infrastructure to withstand current and future hazards. In the coastal area of the state, the 2023 Coastal Master Plan Viewer can be used to evaluate land change (from wetland to open water), flood depths and estimated economic damages at current levels of risk and every decade in the future for 50 years. Users can select lower or higher environmental scenarios, the annual exceedance probability of storms and overlays of proposed risk mitigation projects. Risk can be seen at the coast-wide, parish-wide or community level as seen in the screenshots below.

### B. Climate Risk Mitigation Measures

*Infrastructure Hardening and Critical Resiliency Need Commitments for GUMBO 2.0 Subgrant Proposals.*

Buried Fiber Commitments: Significantly improving the resiliency of communications infrastructure via the use of buried fiber is a top policy priority of the state. Given Louisiana's significant climate-driven disaster risk, the state has analyzed unserved and underserved funding requirements to assess whether the \$1.355 BEAD billion allocation is sufficient to fund necessary hardening steps without impairing the goal of ensuring 100% coverage to eligible locations. That analysis, based on data provided to the state by NTIA, indicates that such hardening investments are within the state's BEAD budget capacity. The GUMBO 2.0 subgrant award plan therefore includes several steps to prioritize proposals that include infrastructure hardening steps such as the use of buried instead of aerial fiber.

Wireless Tower Hardening Commitments: Any subgrant application proposing the deployment of new wireless towers in support of wireless services deployed pursuant to a subgrant award – including for Fixed Wireless deployment or for mobile broadband resiliency commitments as outlined below –received 20 additional points in the GUMBO 2.0 subgrant process, as provided in IPv2 Section 2.4.2.1, if the following hardening and resiliency commitments are included:

- Structural Integrity – Towers to be constructed from galvanized steel poles anchored to structural concrete pads. Both tower and foundation must be designed for wind load standards of 40 Kips sq/in for the top attachment and 30 Kips sq/in for the lower three attachments.
- Backhaul – Towers to be outfitted with fiber for backhaul. Fiber connections must be survivable redundant deployments to support multiple tenant traffic. Survivable redundant fiber provides a durable connection to the tower site with at least two paths from the site to the local transit aggregation point. If the tower site does not initially use fiber backhaul, the tower must be located within 1000 feet of a fiber access node.
- Power – Sites shall be designed and installed with a 4-gang meter bank with an 800 amp single phase, equivalent to 200 amps for each carrier, and shall include support for the use of generator back-up power during periods of disruption to electrical supply.
- Tower siting – multi-use towers shall be coordinated with possible tenants to identify appropriate areas for the various users.
- Attachable Space/Tower Height – funded towers serving wireless deployments (including fixed wireless technologies) shall be designed to support multi-tenant attachments. The tower must provide at least 60 feet of vertical space to be used by additional tenants above the minimum tower height necessary for the funded service. The attachable tenant envelopes within the



vertical space must be at least 10 feet. Best practice should provide 15 feet of vertical space for attachable tenant envelopes.

Commitments to Expanded Access to Baseline Mobile Broadband Services: A second top priority of the state is to expand access to mobile broadband service as a critical tool for residents in the time before, during, and after a natural disaster. In addition to the important role played by fixed broadband infrastructure, during climate-driven natural disasters, ubiquitous access a baseline level of mobile data communications is imperative for alerting communities to threats, providing public safety information during an event, and by providing a fail-safe communications platform to enable recovery efforts in the event fixed infrastructure faces lengthy periods of disruption.

As described in IPv2 Section 2.4.2, the GUMBO 2.0 subgrant process therefore identifies certain areas of the state as “Critical Resiliency Need” Sub-project Areas (CRN-SPAs) that lack the minimal mobile broadband service needed to afford residents and businesses access to mobile communications in the critical times before, during, and after a natural disaster when access to fixed communications infrastructure may be disrupted. These targeted commitments to deploy new mobile broadband infrastructure as a resiliency solution in areas also benefiting from new BEAD-funded fixed infrastructure will advance both the BEAD goals of improved broadband access and climate resiliency.

Specifically, a CRN-SPA shall be an SPA in which any BSL lacks access to at least 3G mobile service from at least one facilities-based mobile provider, as reported via the most recent FCC Broadband Data Collection data as of the time of SPA designation.

The state finds that such lack of at least minimal 3G service— in other words, an area that has not only failed to benefit from the current 5G NR investment cycle but also has not yet received the benefits of baseline 4G LTE service more than a decade after deployment to most areas of the United States – poses an extreme risk to local communities from weather emergencies and other climate-driven natural disasters. For example, areas lacking even 3G service are unable to enjoy the full protections of the FCC’s Mandatory Disaster Response Initiative (MDRI). Adopted by the FCC in 2022, the MDRI codifies new “prompt and decisive measures to improve the reliability and resiliency of mobile wireless networks that are a significant lifeline for those in need during disasters and other emergencies.” As noted by the FCC in the 2022 order adopting the MDRI, “[t]he need to strengthen the nation’s networks has been further underscored . . . in the face of on-going wildfires in New Mexico and other western states and the forecast that 2022 will bring another historically active hurricane season.” The devastating fire and hurricane events during of the summer of 2023 have only underscored this rationale for of providing 100% of residents access to the life-saving capabilities of mobile communications networks.

This initial set of CRN-SPA designations was released as part of the overall initial set of proposed SPAs prior to the start of the application process. During the public comment period for that SPA list, the state considered input from the public or providers providing a rationale for any adjustments to CRN-SPA designations. The state retained sole discretion with respect to any such adjustments, and in making such final determination prioritized the principle of ensuring that all state residents and businesses have access to critical mobile communications capabilities during times of emergency. In particular, the state also evaluated whether certain SPAs with only limited access to 4G LTE coverage even if 3G service is available should be designated as CRN-SPAs on the final list, taking into account input including from community stakeholders.

### C. Periodic Plan Review

Coastal Protection and Restoration Authority (CPRA) is tasked with ensuring that Louisiana cost is resilient from climate threats. Louisiana's Coastal Master Plan aims to preserve coastal Louisiana's rich culture, ecosystems, and natural resources threatened by ongoing land loss and flood risk. It is part of a larger, ongoing effort led by CPRA to adapt to Louisiana's coast in the face of future environmental change. CPRA does an annual review of the plan with a major strategic plan update every five years. The Governor's Office of Homeland Security and Emergency Preparedness began a comprehensive planning process in 2004 to improve hazard mitigation, which resulted in the Louisiana Hazard Mitigation Plan. This plan is reviewed annually with a major update performed every five years.

To view CPRA's 2023 Louisiana's Comprehensive Master Plan for a Sustainable Coast please go to <https://coastal.la.gov/our-plan/2023-coastal-master-plan/>

To view the Louisiana Governor's Office of Homeland Security and Emergency Preparedness (GOHSEP) 2024 Hazard Mitigation Plan go to <https://gohsep.la.gov/divisions/hazard-mitigation-assistance/state-hazard-mitigation-plan/>

### 11.7 Middle-Class Affordability

**Provide the implementation status of plans described in the approved Initial Proposal Requirement 20 related to middle-class affordability, including a description of specific steps taken since the submission of the Initial Proposal.**

The affordability scoring provisions of IPv2 Section 2.4.2.1 are hereby incorporated into this response as a core component of the state's Middle-Class Affordability Plan.

The Office strongly encourages that an affordable broadband service option be made available to all eligible prospective customers across the subgrantee's service territory; however, this service option must at least be available to locations within the awarded project areas under the BEAD program.

The Office will promote the use of consumer pricing benchmarks that will provide objective criterion to use in determining whether the rate offerings of broadband service providers are reasonable.

Specifically, to address Middle Class Affordability, the Office proposes the following requirements as defined within our subgrant program in Requirement 8 of this document.

## Section 12 Substantiation of Priority Broadband Projects (Requirement 12)

### 12.1 Deployment of Priority Broadband Projects

**Describe, in detail, how the Eligible Entity maximized deployment of Priority Broadband Projects and deployment of non-priority reliable broadband projects prior to deployment of alternative technologies. In particular, describe steps the Eligible Entity took to pursue service by reliable broadband technology in areas that the Eligible Entity proposes to serve via alternative technology.**

Per IPv2, Section 2.4.2, in order to maximize deployment of Priority Broadband Projects, the type of applications that could be awarded following Round 1 submissions were limited to two categories as follows: (1) FTTH applications that do not overlap with any other application of any technology type, and that request funding no greater than the reference funding levels for all included SPAs; or (2) FTTH applications that achieve a decisively higher score at least 100 points better<sup>2</sup> than any overlapping application of any technology type (informally referred to below as “decisively higher score” applications). Round 1 applications that overlapped with awards made in either of these categories were deemed withdrawn, although applicants were permitted to resubmit any non-overlapping SPAs in Round 2.

After receiving all Round 2 submissions, the state first ranked all FTTH applications from highest to lowest score. By definition, Round 2 applications will not overlap with any previously awarded SPAs; therefore, the highest scored Round 2 FTTH application will be provisionally<sup>3</sup> awarded for all included SPAs at the total requested overall funding level. ConnectLA will then review each next-highest ranked FTTH application in order, applying the provisional selection and de-confliction rules between any overlapping FTTH applications as described in IPv2 Section 2.4.6<sup>4</sup>. This approach expressly implements the BEAD requirement that FTTH applications are always selected over non-FTTH applications, subject only to the EHCT process followed at the end of the process as described in IPv2 Sections 2.4.9 and 2.4.10.

After all available FTTH applications are resolved using this process, all non-FTTH applications were similarly ranked from highest to lowest score, with reliable service (cable/HFC and licensed fixed wireless) applications being placed ahead of other terrestrial (unlicensed fixed wireless) applications. In addition, the secondary scoring criterion of Speed of Network created an additional score-based prioritization as between non-FTTH applications, such that for example a licensed fixed wireless project that is able to deliver higher maximum performance levels and/or scalability and asset longevity will receive a higher score than one only able to support lower performance<sup>5</sup>.

This approach ensured that priority broadband projects were always given first preference as required, because no non-priority project was considered until all priority projects had been scored, ranked and resolved for overlap. Only after all priority projects had been either awarded in full, partially awarded based on deconfliction procedures or discarded due to overlap with a higher-scored priority project, were non-priority projects evaluated. Overlapping non-FTTH applications will be selected and de-conflicted vis-à-vis each other using the same procedure described in IPv2 Section 2.4.6.

## Section 13 Subgrantee Selection Certification (Requirement 13)

### 13.1 Subgrantee Scoring Criteria

For each primary and secondary scoring criteria used in subgrantee selection, provide a summary of the range of commitments, specifically as they relate to workforce development, compliance with Federal labor and compliance laws, and affordability, made by provisionally selected subgrantees to warrant benefits in the approved Subgrantee Selection Process. Scoring criteria must be applied consistent with the prioritization framework laid out in Section IV.B.7.b of the BEAD NOFO.

Primary Criteria	Max Points Available	601
Minimal BEAD Outlay	300	Based on % of reference funding level requested for a total project area
Affordability	200	Based on the applicant's commitment to support affordability in BEAD areas consistent with other areas of the state
Fair Labor Practices	101	Based on compliance record

Secondary and Additional Criteria	Max Points Available	197
Speed to Deployment	12	Points for enforceable deployment plans faster than 48 months
Economically Disadvantaged Areas	25	Additional points for including economically challenged SPAs
Infrastructure Resiliency Commitment	100	Additional points for buried fiber and for commitments to designated SPAs lacking mobile broadband resiliency infrastructure
Number of Eligible Locations Included Within a Parish	35	Additional points for applications covering greater numbers of eligible locations within a given parish
Speed of Network	25	25 points for FTTH projects; non-FTTH scoring based on performance levels and scalability of non-FTTH networks

#### 1. Primary Criteria – Minimal Bead Outlay:

- a. Each application in each of Round 1 and Round 2, will be scored based on the amount of requested BEAD funding as follows:
  - i. For applications requesting no more than the amount of reference funding set for the applicable round for all included SPA(s)
    1. Score = 300- [percent of reference funding requested, rounded to the nearest whole integer value].
    2. For example:
      - a. If 100% of the reference funding is requested, the score assigned will be 200.

- b. If 80% of reference funding is requested, the score assigned will be 220.
    - c. If 1% of reference funding is requested, the score shall be 299.
  - ii. Applicants are permitted to request up to 200% of the reference amount. For applications requesting more than the amount of reference funding for all included SPA(s):
    - 1. Score = 100- [percent of reference funding requested – 100, rounded to the nearest whole integer value].
    - 2. For example:
      - a. If 150% of reference funding is requested, the score assigned will be 50.
      - b. If 190% of reference funding is requested, the score assigned will be 10.
    - 3. The application system will not accept funding requests greater than 200% of the reference funding.
    - 4. The maximum score for any application requesting more than the reference funding will be 100.
- b. Maximum awardable points: 300

## 2. Primary Criteria – Affordability

- a. Following Louisiana statutory requirements. GUMBO 2.0 does not require subgrantees to offer any particular rate for any particular tier of service, although existing Louisiana law does impose certain requirements on existing in-state providers as described below. Instead, this federally mandated scoring category offers applicants the opportunity to obtain additional points via voluntary affordability commitments of their choosing, with scoring defined as follows:
  - i. This affordability scoring approach follows the provision of Louisiana law requiring that “[a] grant recipient that has offered broadband service to at least one thousand consumers for a period of at least five consecutive years shall offer broadband service at prices consistent with offers to consumers in other areas of the state.”<sup>8</sup> This statutory Louisiana requirement shall be implemented as a subgrant condition, for a duration of time as required by final NTIA guidance,<sup>9</sup> for any subgrant recipient meeting that definition, with “prices consistent with offers to consumers in other areas of the state” scored as an affordability commitment using the methodology below.
- b. Affordability score for FTTH projects: 200 points. Following Louisiana law, and applying the mandatory federal requirement in the BEAD NOFO that a primary scoring criterion must be “[t]he prospective subgrantee’s commitment to provide the most affordable total price to the customer for 1 Gbps/1 Gbps service in the project area,”<sup>10</sup> a base score of 200 points in this category will be awarded as follows:

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<sup>8</sup> Louisiana Revised Statutes 51 §2370.29

<sup>9</sup> The duration of the affordability commitments under this section shall be the same as that for the Low-cost Service Option, as specified by NTIA in future guidance, as described below in section 2.12.1.D.

<sup>10</sup> BEAD NOFO IV.B.2.i (discussion of mandatory Primary Criteria for Priority Projects, NOFO page 43).

- i. Compliance with Louisiana law on affordability, if applicable to the prospective subgrantee. Any applicant that has offered broadband service to at least one thousand consumers for a period of at least five consecutive years that includes a commitment to provide 1 Gbps/1Gbps service in its proposed BEAD subgrant area at a price no higher than its offer to consumers for 1 Gbps/1 Gbps service in other areas of the state will receive a score of 200 points.
    - ii. Alternate method of achieving a full baseline score. An applicant that has not offered broadband service to at least one thousand customers for a period of at least five consecutive years, or an applicant that does not otherwise offer 1 Gbps/1Gbps service, that includes a commitment to provide 1 Gbps/1Gbps service to all included locations in its application at a price no higher than the median price for all 1Gbps/1Gbps service offerings reported in the most recent year's FCC Urban Rate Survey will receive a base score of 200 points.
    - iii. This section shall define the affordability score for a Priority Broadband Project (i.e., end-to-end FTTH) irrespective of other service tiers proposed by the applicant.
  - c. Affordability score for non-FTTH projects: 200 points. For non-FTTH projects, the mandatory federal requirement in the BEAD NOFO is that a primary scoring criterion must be "[t]he prospective subgrantee's commitment to provide the most affordable total price to the customer for 100 Mbps/20 Mbps service in the project area."<sup>11</sup>
    - i. Compliance with Louisiana law on affordability, if applicable to the prospective subgrantee: 200 points. Any applicant that has offered broadband service to at least one thousand consumers for a period of at least five consecutive years that includes a commitment to provide 100 Mbps/20 Mbps service in its proposed BEAD subgrant area at a price no higher than its offer to consumers for 100 Mbps/20 Mbps service in other areas of the state will receive a score of 200 points.
    - ii. Alternate method of achieving a full baseline score. An applicant that has not offered broadband service to at least one thousand customers for a period of at least five consecutive years, or an applicant that does not otherwise offer 100 Mbps/20 Mbps service, that includes a commitment to provide 100 Mbps/20 Mbps service to all included locations in its application at a price no higher than the median price for all 100 Mbps/20 Mbps service offerings reported in the most recent year's FCC Urban Rate Survey will receive a base score of 200 points.
    - iii. This section shall define the affordability score for a non-Priority Broadband Project (i.e., any alternative technology or mix other than end-to-end FTTH) irrespective of other service tiers proposed by the applicant.
  - d. Use of FCC Urban Rate Survey. If applicable to a subgrantee using the alternate methods outlined above in section b.ii or c.ii, the FCC Urban Rate Survey will be used as follows:
    - i. For each subgrant performance year covered by an applicable subgrantee commitment, the state will use the prior year's FCC Urban Rate Survey broadband

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<sup>11</sup> BEAD NOFO IV.B.2.ii (discussion of mandatory Primary Criteria for Non-Priority Projects, NOFO page 45).



- c. This scoring model for the Fair Labor Practices primary criterion implements the NOFO requirement that “Eligible Entities must give priority to projects based on a prospective subgrantee’s demonstrated record of and plans to be in compliance with Federal labor and employment laws. New entrants without a record of labor and employment law compliance must be permitted to mitigate this fact by making specific, forward-looking commitments to strong labor and employment standards and protections with respect to BEAD-funded projects.”<sup>12</sup>
- d. The table below summarizes the total points awarded for different combinations of past compliance records and prospective compliance plans under of this scoring approach:

Years of Compliance	< 3 years	3	4	5
Baseline compliance plan	10	90	95	101
+ 1 additional element	50	101	101	101
+ 2 additional elements	80	101	101	101
+ 3 or more additional elements	100	101	101	101

- e. Applicants shall be permitted to have a single statewide workforce plan that applies to all applications, or to propose different workforce plans for individual applications.
- f. Maximum awardable points: 101

**4. Secondary and Additional Criteria**

- a. Speed to Deployment
  - i. Any application that certifies, including binding commitments and assumption of contractual liability for penalties established by the state for non-compliance, that deployment to all included eligible locations will be completed in less than the 48 months required by BEAD shall receive additional points as follows:
    1.  $[48 - (\text{number of months to complete deployment, rounded up to the next whole month})] / 4$
    2. For example, a project that certifies completion in 8 months receives 10 additional points.
  - ii. Maximum awardable points: 12
- b. Economically Disadvantaged areas
  - i. Any application that includes ED-SPAs shall receive additional points as follows.
    1. 15 points: Include all ED-SPAs within a given parish.
    2. 1 point: Any individual ED-SPA, but not all within a parish
    3. For example, an application that includes all ED-SPAs in one parish and two additional ED-SPAs but not all in another parish shall receive 17 additional points.
  - ii. Maximum awardable points: 25
- c. Infrastructure Hardening and Resiliency Commitments
  - i. Any application for the deployment of fiber infrastructure to last-mile eligible locations that includes an enforceable commitment to the infrastructure hardening step of including at least 90% buried fiber plant –

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<sup>12</sup> NOFO IV.B.7.b.i and IV.B.7.b.ii



including 100% buried plant to eligible CAIs, unless a specific exception is granted -- as specified in section 2.11.1.D will receive 30 points.

- ii. Any application involving the deployment of new wireless tower infrastructure that includes an enforceable commitment to the Wireless Tower Hardening specifications provided in section 2.11.1.D will receive 20 points. This point total shall be applied once for an entire application, irrespective of the number of such hardened towers included.
- iii. In addition, any application that includes at least one Critical Resiliency Need (CRN)- SPA and includes an enforceable commitment to deploy necessary mobile broadband infrastructure to achieve the resiliency requirements of the CRN designation, following all requirements as detailed in section 2.11.1.D, shall receive additional points as follows:
  - 1. 40 points: Include all CRN-SPAs within a given parish.
  - 2. 10 points: Any individual CRN-SPA, but not all within a parish.
  - 3. For example, an application that includes all CRN-SPAs in one parish and one additional CRN-SPA in another parish shall receive 50 additional points on top of any base points for buried fiber or hardened tower commitments as provided in sections i and ii above.
  - 4. Any award of points in this category is subject to the state's technical review of the satisfactoriness of proposed plans to fulfill specified resiliency capabilities, according to the specifications provided in section 2.11.1.D.
- iv. Applications may receive points for any combination of commitments in these areas, but the total points available in this overall category to any application is capped at the maximum total awardable points level below.
- v. Maximum total awardable points: 100.
- d. Number of eligible locations within a given parish
  - i. During the review of each application, the state will total the number of eligible locations within all included SPAs in each Louisiana parish within the application and identify the highest such count.
    - 1. For example, if an application includes 8 SPAs with a total of 1000 eligible locations in parish A and 1 SPA with a total of 75 eligible locations in parish B, the highest count value would be 1000 eligible locations.
    - 2. If an application only includes SPA(s) in a single parish, the highest count value would be the total number of eligible locations in all SPAs included in the application.
  - ii. Applications shall receive additional points based on this highest count value as follows:
    - 1. 10 points: An application that includes at least 500 eligible locations within a single parish.
    - 2. 20 points: An application that includes at least 2000 eligible locations within a given parish.
    - 3. 30 points: An application that includes 5000 eligible locations or more within a given parish.

- 4. 35 points: An application that includes 100% of eligible locations within a given parish, only if the applicable highest count value is greater than 2000 eligible locations.
- iii. Maximum total awardable points per application: 35
- e. Speed of Network

- i. FTTH applications shall receive 25 points in this category.
- ii. Non-FTTH applications only shall be scored based on certified speed and latency performance commitments that are enforceable subgrant conditions and subject to verification after deployment to all eligible BSLs as well as on length of useful life of the proposed infrastructure and future scalability.
  - 1. Speed and latency performance characteristics, as certified by the applicant and subject to technical review and verification by the state, shall receive points as follows:

Minimum downstream/upstream speed (Mbps)	Maximum latency (milliseconds)	Points awarded
100/20	100	2
200/50	100	4
400/100	100	10
1000/250	100	20

- 2. To receive points in any of these categories, the state’s technical review must confirm that the proposed network design has the ability to deliver the above performance levels to all eligible locations within an application, including reasonable assessment of how the proposed network can add incremental capacity in a cost-effective manner as new customers are added.
- 3. Total awardable sub-category points for non-FTTH networks: 20
- iii. For non-FTTH technologies, the length of useful life and future scalability, as certified by the applicant and subject to technical review and verification by the state, shall receive points as follows.
  - 1. Useful life of funded infrastructure, as assessed by the state:
    - a. <5 years: 0 points
    - b. 5-10 years: 1 point
    - c. 10+ years: 2 points
  - 2. Cost-effectiveness of future scalability to significantly performance levels of proposed technology, as assessed by the state:
    - d. Ineffective: 0 points
    - e. Somewhat cost effective: 1 point
    - f. Very cost effective: 2 points
  - 3. Total awardable sub-category points for non-FTTH networks: 4
- iv. Maximum awardable Speed of Network points: 25.

## Section 14 Environmental and Historic Preservation (EHP) Documentation (Requirement 14)

### 14.1 Environmental Historic Preservation (EHP) Requirements

**Describe how the Eligible Entity will comply with applicable environmental and historic preservation (EHP) requirements, including a brief description of the methodology used to evaluate the Eligible Entity's subgrantee projects and project activities against NTIA's programmatic and National Environmental Policy Act (NEPA) guidance.**

ConnectLA will ensure full compliance with all applicable environmental and historic preservation (EHP) requirements by adhering to the requirements of the National Environmental Policy Act (NEPA), Section 106 of the National Historic Preservation Act (NHPA), Section 7 of the Endangered Species Act, and Section 404 of the Clean Water Act, as applicable, and NTIA's programmatic guidance. This compliance is a critical part of the project review process, and all subgrantee projects will undergo a detailed evaluation to ensure minimal environmental and historic impacts.

#### **NEPA Compliance**

ConnectLA will serve as a joint lead agency for NEPA and will design and implement a program to ensure compliance by the work implemented by subgrantees. As a joint lead agency, ConnectLA will fulfill the role of lead agency, as defined in 42 U.S. Code § 4336a, with respect to proposed deployment activities undertaken. ConnectLA shall supervise the preparation of required EHP compliance documents or, depending on the complexity of the deployment activity and the capability of the subgrantee implementing the deployment activity, may directly assist in the preparation of such documents. In all cases, ConnectLA shall centrally review and concur with the findings and recommendations of all EHP compliance documentation prior to approval. ConnectLA has retained subject matter experts (SME) and GIS specialists to both coordinate review activities and to prepare environmental review documents, as necessary.

ConnectLA has assigned 1,853 sub-project areas (SPAs) to the participating subgrantees throughout the state. ConnectLA will use its online reporting and compliance platform to receive project implementation plans for these SPAs from the subgrantees detailing the description and location of deployment activities intended to service the SPA. ConnectLA's SMEs will review the information provided in the subgrantee's submittal and determine the appropriate level of review required based on NTIA's programmatic and general NEPA guidance.

ConnectLA anticipates that the nature of the deployment activities under evaluation for each SPA and the technical environmental capability of the submitting subgrantee, will factor in to whether the environmental review shall be performed by the subgrantee and supervised by ConnectLA or, in certain circumstances performed directly by ConnectLA. As such, the following compliance responsibility scenarios are expected:

1. In many instances where the deployment activities qualify for one of NTIA's categorical exclusions, the review may be completed by ConnectLA using GIS mapping and report-generating software to which ConnectLA already has access. This approach will allow for more timely preparation of this level of review and a report with a uniform appearance and centrally sourced data inputs.

2. For complex deployment activities to be undertaken by subgrantees or where an environmental assessment is required, ConnectLA will supervise the preparation of environmental review documents by the subgrantee and shall retain the privilege of final approval prior to implementation of the deployment activities in question.
3. If in ConnectLA's judgement, the subgrantee lacks the technical EHP expertise to produce a compliant review document, ConnectLA shall support the subgrantee in preparation of the required document package. In this scenario, the subgrantee will be required to provide the supporting documentation used in the preparation of the environmental review.

ConnectLA shall conduct ongoing discussions with the subgrantees prior to project implementation to determine the appropriate course of action to ensure EHP compliance, taking into consideration the volume and complexity of projects assigned to each subgrantee and the technical EHP capability of each subgrantees.

### **NHPA Compliance**

ConnectLA will not allow to be initiated, as enforceable by the Subgrant Agreement, any grant funded implementation activities prior to the completion of reviews required under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470, et seq.), including any consultations required by Federal law, to include consultations with the State Historic Preservation Office and Federally recognized Native American tribes.

To ensure the timely completion of historic preservation review for all BEAD-funded activities, ConnectLA will require that Subgrantees provide all such information required to:

- At the earliest possible time, provide the NTIA-assigned Environmental Program Officer sufficient information to initiate Tribal notification via the FCC's Tower Construction Notification System (TCNS) when required for grant funded activities;
- Provide notified Tribes with information regarding grant funded activities via their preferred communication means, as identified in TCNS;
- Apply the Advisory on Historic Preservation (ACHP) Program Comment to Avoid Duplicative Reviews for Wireless Communications Facilities or any other applicable program comment or program alternative developed to address the Section 106 review of communications facilities;
- Notify NTIA of any Tribal request for government-to-government consultation or any identification that a grant funded activity may impact a historic property of religious or cultural significance to a Tribe; and
- Provide all consulting parties with the statutorily required time to respond to its determination of a grant funded activity's effect on historic properties.

## **14.2 Environmental Historic Preservation (EHP) Documentation**

**Submit a document which includes the following:**

- **Description of the Eligible Entity's plan to fulfill its obligations as a joint lead agency for NEPA under 42 U.S.C. 4336a, including its obligation to prepare or to supervise the preparation of all required environmental analyses and review documents.**
  - **Evaluation of the sufficiency of the environmental analysis for your state or territory that is contained in the relevant FirstNet Regional Programmatic Environmental Impact Statement**
-

(PEIS), available at <https://www.firstnet.gov/network/environmental-compliance/projects/regional-programmatic-environmental-impact-statements>.

- Evaluation of whether all deployment related activities anticipated for projects within your state or territory are covered by the actions described in the relevant FirstNet Regional PEIS.
- If applicable, a draft supplemental environmental assessment (EA), providing any information or analysis missing from the relevant FirstNet Regional PEIS that is necessary for the programmatic review of BEAD projects within your state or territory.
- Methodology for the NEPA screening of the Eligible Entity's subgrantee projects to identify, confirm, and categorize projects qualifying for NTIA Categorical Exclusions and those requiring further environmental review.
- Description of the Eligible Entity's plan for applying specific award conditions or other strategies to ensure proper procedures and approvals are in place for disbursement of funds while projects await EHP clearances.

### **Joint Lead Agency Responsibility Summary**

ConnectLA understands that it shall serve as a joint lead agency to implement EHP requirements under 42 U.S. Code § 4336a, particularly the obligations listed in paragraph (2). As such, ConnectLA will either directly prepare or supervise the preparation of the required analyses and review documents as described in the scenarios in the above section. ConnectLA retained subject matter experts to direct and coordinate this compliance program.

### **Description of FirstNet Regional PEIS Evaluation**

ConnectLA has reviewed the FirstNet Regional Programmatic Environmental Impact Statement (PEIS). At this time the exact scope and location of Subgrantee projects is to be determined. Currently, it is anticipated that deployment related activities for projects within Louisiana are covered by the actions described in Chapter 8 of the PEIS. In all cases, project scopes will be reviewed, once proposed, to evaluate whether the activities are covered by the FirstNet Regional PEIS. In the event that Subgrantee proposed projects are not sufficiently covered by the FirstNet Regional PEIS, additional analysis will be conducted by subject matter experts to whether supplemental environmental assessment is required to address identified gaps or deficiencies. Although final project scopes and locations are not known, the following activities described in the PEIS may be implemented:

- **Wired Projects**
  - Use of Existing Conduit – New Buried Fiber Optic Plant: Disturbance associated with the installation of fiber optic cable in existing conduit would be limited to entry and exit points of the existing conduit in previously disturbed areas.
  - Use of Existing Buried or Aerial Fiber Optic Plant or Existing Submarine Cable: Lighting up of dark fiber
  - Installation of Optical Transmission or Centralized Transmission Equipment requiring no ground disturbance
  - New Build – Buried Fiber Optic Plant: Plowing (including vibratory plowing), trenching, or directional boring and the construction of points of presence (POPs), huts, or other associated facilities or hand-holes to access fiber
  - New Build – Submarine Fiber Optic Plant: The installation of cables in limited nearshore and inland bodies of water.

- New Build – Aerial Fiber Optic Plant: Potential impacts would be similar to Buried Fiber Optic Plant, especially where ground disturbance is expected when connecting aerial cable to new ground locations or installation of new or replacement of existing telecommunications poles.
- Collocation on Existing Aerial Fiber Optic Plant: Any ground disturbance could cause direct and indirect impacts to wetlands from increased suspended solids and runoff from activities, depending on the proximity to wetlands and type of wetlands that could be affected.
- Installation of Optical Transmission or Centralized Transmission Equipment: installation of transmission equipment that would require grading or other ground disturbance to install small boxes or huts, access roads, or similar.
- Wireless Projects
  - New Wireless Communication Towers: Installation of new wireless towers and associated structures (generators, equipment sheds, fencing, security and aviation lighting, electrical feeds, and concrete foundations and pads) or access roads
  - Collocation on Existing Wireless Tower, Structure, or Building: Collocation would involve mounting or installing equipment (such as antennas or microwave dishes) on an existing tower
- Satellite and Other Technologies
  - Satellite-Enabled Devices and Equipment: including permanent equipment on existing structures

ConnectLA also reviewed the PEIS with regard to the following:

- Regulatory Changes: no known changes to the environmental or historic preservation laws and regulation in the State of Louisiana would have a material impact on the analysis presented in the PEIS.
- Affected Environment: The PEIS adequately described the potentially affected environment in Louisiana, including infrastructure and biological resources. It should be noted that 2 bird species have been listed on the Fish and Wildlife Service's (FWS) Endangered and Threatened Species List since the publication of the PEIS and are believed to or known to occur in Louisiana. Neither listing has a material potential to impact broadband deployment activities apart from the analyses and protections already in place for threatened and endangered species in the State. The species added to the FWS list since the publication of the PEIS include the following:
  - Black-capped Petrel (*Pterodroma hasitata*)
  - Eastern Black rail (*Laterallus jamaicensis ssp. jamaicensis*)

### **NTIA CE Screening Description**

ConnectLA utilize the following process system to identify, confirm, and categorize projects that likely qualify or Categorical Exclusions (CATEX) under NTIA's NEPA guidance and those that require further environmental review:

1. Project Screening Process
  - a. **Initial Review of Project Scope:** ConnectLA will begin with a preliminary screening of proposed subgrantee projects, once submitted, to evaluate their potential environmental

impacts. This screening process will rely on the NEPA guidance provided by NTIA, particularly Appendix B, which outlines activities that typically qualify for Categorical Exclusions. The process involves the following steps: ConnectLA's SMEs will review the project scope and details, including project size, location, construction methods, and proximity to sensitive environmental or historical areas. This review helps in determining whether the project falls under a CATEX or requires further analysis.

- b. **Cross-Referencing with NTIA's Categorical Exclusions:** Each project will be cross-referenced with the list of Categorical Exclusions provided in Appendix B of NTIA's NEPA guidance. Projects that involve activities with minimal or no environmental impact, such as minor upgrades, maintenance, or non-intrusive installations, are more likely to qualify for a CATEX.
- c. **Review for Extraordinary Circumstances:** Each project that would normally be considered categorically excluded will be evaluated to determine if extraordinary circumstances (Appendix C of NTIA NEPA Guidance Document) are present. If any of the extraordinary circumstances are involved with the proposed project, ConnectLA, supervising the subgrantee, will conduct and document the appropriate environmental analysis to determine if the action warrants a categorical exclusion or if the preparation of an environmental assessment or EIS is required.

### **Specific Award Conditions (SACs) Description**

The Subgrant Agreement to be used for deployment activities includes provisions prohibiting subgrantees from initiating or allowing any grant funded implementation activities prior to the following:

- The completion of any review required under the National Environmental Policy Act of 1969 (42 U.S.C. 4321, et seq.) (NEPA), and issuance, as required, of a Categorical Exclusion (Cat Ex) determination, Record of Environmental Consideration (REC), Finding of No Significant Impact (FONSI), Record of Decision (ROD) (hereinafter "decision documents") that meets the requirements of NEPA;
- The completion of reviews required under Section 106 of the National Historic Preservation Act of 1966 (16 U.S.C. 470, et seq.) (NHPA), including any consultations required by Federal law, to include consultations with the State Historic Preservation Office and Federally recognized Native American tribes;
- The completion of consultations with the U.S. Fish and Wildlife Service (USFWS) or the National Marine Fisheries Service (NMFS), as applicable, under Section 7 of the Endangered Species Act (16 U.S.C. 1531, et seq.), and/or consultations with the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act (33 U.S.C. 1251, et seq.), as applicable; and
- Demonstration of compliance with all other applicable Federal, state, and local environmental laws and regulations.

Additionally, the Subgrant Agreement requires that the subgrantee:

- will not commence implementation and funds will not be disbursed until any necessary environmental review is complete and NTIA has approved any necessary decision document, except for the limited permissible activities identified in the Subgrant Agreement;

- must timely prepare any required NEPA documents and obtain any required permits, and must adhere to any applicable statutory deadlines as described in 42 U.S.C. 4336g(a); and
- must provide a milestone schedule identifying specific deadlines and describing how Subgrantee proposes to meet these timing requirements including, as required, the completion of consultations, the completion of NEPA and Section 106 reviews, and the submission of Environmental Assessments (EAs) or Environmental Impact Statements (EISs).

### **Other Relevant Information**

**Archaeological Resources:** ConnectLA's Subgrant Agreement also provides for the protection of archaeological resources. Burial sites, human remains, and funerary objects are subject to the requirements of all applicable Federal, Tribal, state, and local laws and protocols, such as the Native American Graves Protection and Repatriation Act (NAGPRA), in addition to Section 106 of the NHPA. Subgrantees must notify the Office of inadvertent discoveries and potential impacts to these resources. The Subgrant Agreement requires that if any potential archeological resources or buried human remains are discovered during construction, the subgrantee must immediately stop work in that area, secure that area, and keep information about the discovery confidential, except to notify ConnectLA, NTIA and the interested SHPO, THPO, and potentially affected Tribes. Such construction activities may then only continue with the written approval of ConnectLA and NTIA.



## Section 15 Consent from Tribal Entities (Requirement 15)

### 15.1 Documentation of Consent from Tribal Entities

**Upload a Resolution of Consent from each Tribal Government (in PDF format) from which consent was obtained to deploy broadband on its Tribal Land. The Resolution(s) of Consent submitted by the Eligible Entity should include appropriate signatories and relevant context on the planned (f)(1) broadband deployment including the timeframe of the agreement. The Eligible Entity must include the name of the Resolution of Consent PDF in the Deployment Projects CSV file.**

See Resolution(s) of Consent from each of the following Tribal Governments at Exhibit I:

1. Jena Band of Choctaw Indians
2. Tunica-Biloxi Tribe of Louisiana (pending)
3. The Chitimacha Tribe of Louisiana (pending)
4. Coushatta Tribe of Louisiana – Tribal Consent is not necessary because Coushatta has received a provisional award to deploy service to BSLs within their tribal lands.

## Section 16 Report of Unsuccessful Applications due to Eligible Entity Regulations (Requirement 16)

### 16.1 Unsuccessful Applications due to laws of Eligible Entity

**Did the Eligible Entity have any applications that were unsuccessful due to laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they pre-date or post-date enactment of the Infrastructure Act, that the Eligible Entity did not waive for purposes of the BEAD Program?**

No, ConnectLA did not have any applications that were unsuccessful due to laws concerning broadband, utility services, or similar subjects, whether they pre-date or post-date enactment of the Infrastructure Act, that were not waived for purposes of the BEAD Program.

### 16.2 Unsuccessful Applications due to laws of Eligible Entity

**As a required attachment only if there were unsuccessful applications due to laws of the Eligible Entity, submit a completed “Regulatory Barriers for Applicants” template.**

N/A

DRAFT

## Section 17 Waivers and Public Comment

### 17.1 Waivers for BEAD Requirements

**If any waivers are in process and/or approved as part of the BEAD Initial Proposal or at any point prior to the submission of the Final Proposal, list the applicable requirement(s) addressed by the waiver(s) and date(s) of submission. If not applicable to the Eligible Entity, note 'Not applicable.'**

Pending

### 17.2 Waivers for BEAD Requirements

**If not already submitted to NTIA, and the Eligible Entity needs to request a waiver for a BEAD program requirement, upload a completed Waiver Request Form here. If documentation is already in process or has been approved by NTIA, the Eligible Entity does NOT have to upload waiver documentation again.**

Pending

### 17.3 Public Comment Period

**Describe the public comment period and provide a high-level summary of the comments received by the Eligible Entity during the public comment period and how the Eligible Entity addressed the comments. The response must demonstrate:**

Pending

## Section 18 Exhibits

Exhibit A – Subgrantees csv

[Subgrantees csv](#)

Exhibit B – Deployment Projects csv

[Deployment Projects csv](#)

Exhibit C – Locations csv

[Locations csv](#)

Exhibit D – CAIs csv

[CAIs csv](#)

Exhibit E – BEAD Program Monitoring Plan

[BEAD Program Monitoring Plan](#)

Exhibit F – Subrecipient Agreement

[Draft Subrecipient Agreement](#)

Exhibit G – Local Coordination Tracker

[Local Coordination Tracker](#)

Exhibit H – Non-Deployment Scoring Rubric

[Non-Deployment Scoring Rubric](#)

Exhibit I – Documentation of Consent from Tribal Entities

1. [Jena Band of Choctaw Indians](#)
2. Tunica-Biloxi Tribe of Louisiana (pending)
3. The Chitimacha Tribe of Louisiana (pending)
4. Coushatta Tribe of Louisiana – Tribal Consent is not necessary because Coushatta has received a provisional award to deploy service to BSLs within their tribal lands.