INTERNET FOR ALL

BEAD Five-Year Action Plan-Digital Equity Plan Alignment Guide

U.S. Department of Commerce

National Telecommunications and Information Administration

Introduction

This guide was created to support entities receiving Initial Planning Funds for the Broadband Equity, Access, and Deployment (BEAD) Program and recipients of the State Digital Equity Planning Grant (DE Planning) Program, which is one of the Digital Equity Act Programs. As eligible participants in both programs, it is critical that states and territories ("Participants") align their efforts because the programs have shared objectives. The BEAD Program begins with Initial Planning Funds for planning and pre-deployment activities, including for the creation of a *Five-Year Action Plan*, and the Digital Equity Act Programs begin with State Digital Equity Planning Grants to create a *State Digital Equity Plan*.

Participants should view their projects funded by the BEAD and the DE Planning Programs as complementary efforts aimed at the unified objective of closing the digital divide.

This guide is structured as follows:

I. Overview of BEAD and DE Planning Programs
II. Key Principles of Alignment
   - General Guidance
   - Requirements of Five-Year Action Plan and State Digital Equity Plan
   - Funding Uses for the BEAD and DE Planning Programs

Equity in Broadband Infrastructure Deployment

Digital equity is a core component of the BEAD Program and must be woven throughout participants' plans and proposals. An Eligible Entity is required in its BEAD Five-Year Action Plan to identify digital equity and inclusion needs, goals, and implementation strategy. This is not a "check-the-box" exercise; it is an opportunity for participants to holistically embed equity into projects. **Successful infrastructure deployment requires that all communities can meaningfully adopt and use high-speed internet services, particularly those that have historically been excluded from access**, such as communities of color, Tribal nations, and lower-income areas. NTIA expects that all communities – not just those in high-income or otherwise privileged areas – receive the same quality and speed from infrastructure funded by the BEAD Program; deprioritizing historically marginalized communities due to lack of political will or logistical complications will not be tolerated. This prioritization underscores the BEAD Program's primary focus on providing service to unserved and underserved areas, which is critical to advancing digital equity.

Overview of the BEAD & DE Planning Programs

BEAD Program

The BEAD Program provides $42.45 billion to expand high-speed Internet access by funding planning, infrastructure deployment, mapping, and adoption programs in all 50 states, Washington, D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands. Priority areas for expanding access are unserved and underserved locations.

After submitting their Letter of Intent and Request for Initial Planning Funds, BEAD participants will create and submit to NTIA:

- **Five-Year Action Plan,** which establishes the participant's goals and priorities and serves as a comprehensive needs assessment that will inform its Initial Proposal
- **Initial Proposal,** which is the "first draft" of the participant's Final Proposal for grant funding and should explain how the participants intends to ensure every resident has access to a reliable, affordable, high-speed broadband connection
- **Final Proposal,** which describes how the participant complied with the Initial Proposal and the results of its processes

See Section I.B.2. of the BEAD Notice of Funding Opportunity (NOFO) for the full process of the BEAD Program.

This guide will focus on aligning the development of the BEAD Five-Year Action Plan with the Digital Equity Plan developed under the DE Planning Program.

State Digital Equity Planning Grant Program

The DE Planning Program is a $60 million grant program for all 50 states, Washington, D.C., and Puerto Rico to develop Digital Equity Plans. Other U.S. territories, as well as Native American Tribes, Alaska Native entities, and Native Hawaiian organizations are also eligible for DE Planning Program funding via a separate statutory set-aside and separate program requirements. Digital Equity Plans should be developed in partnership with BEAD program planning.

Both Programs	DE Planning Program Only
❖ All 50 U.S. states ❖ D.C. ❖ Puerto Rico ❖ U.S. Virgin Islands ❖ Guam ❖ American Samoa ❖ Commonwealth of the Northern Mariana Islands	❖ Indian Tribes, Alaska Native entities, Native Hawaiian organizations

The DE Planning Program is the first of three programs launched by the Digital Equity Act (DEA). Two other programs are forthcoming: the State Digital Equity Capacity Grant Program and the Digital Equity Competitive Grant Program. The DEA programs provide funding to promote digital inclusion and advance equity for all. They aim to ensure that all communities can access and use affordable, reliable, high-speed Internet to meet their needs and improve their lives.

State Planning	State Capacity	Competitive
$60M formula funding program to develop Digital Equity Plans	$1.44B formula funding program to implement plans & promote digital inclusion	$1.25B to implement digital equity and inclusion activities

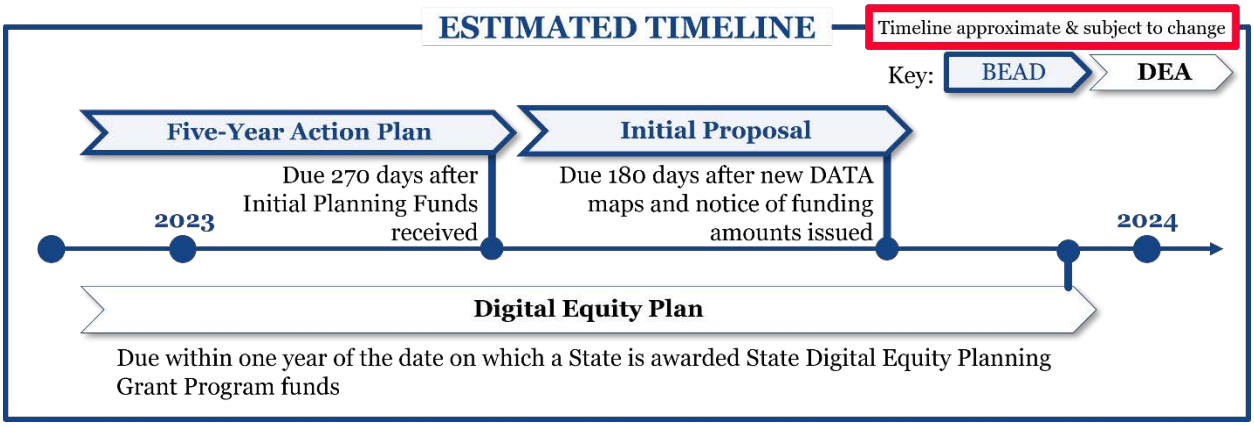
After submitting their DE Planning applications (States, including the District of Columbia and Puerto Rico) or Letters of Intent (U.S. territories and possessions other than Puerto Rico), DE Planning participants will receive planning grant funds allocated according to the State Digital Equity Planning Grant Program NOFO to fund the development of their Digital Equity Plan.

Following the development and approval of their Plan, entities participate in the State Digital Equity Capacity Grant Program to implement the Plan.

State Digital Equity Planning Grant and BEAD Timing

An approximate timeline for the DE Planning Program, the State Digital Equity Capacity Grants, and the BEAD Program is below. It is important that states develop their Digital Equity Plans concurrently with their Five-Year Action Plans and Initial Proposals for BEAD. Close coordination between both tasks will limit duplicative efforts for the planners, limit the burden on stakeholders, and help drive better outcomes.

Bear in mind that the BEAD Five-Year Action Plan is due before the Digital Equity Plan. Because some requirements of the Five-Year Action Plan can be met with the State Digital Equity Plan, states should pace the development of their Digital Equity Plan so that a version can be included within the Five-Year Action Plan. States can continue to develop the Digital Equity Plan to fulfill the DE Planning Program requirements until it is due.



Key Principles of Alignment

General Guidance

While the planning processes and end products for the BEAD Five-Year Action Plan and the State Digital Equity Plan may necessarily be separate, they should be intentionally linked, complementary, and mutually supportive of obtaining the same goals. To establish a strong synergy and joint accountability between the two plans, states should consider adopting the following principles:

Integrated Teaming

There should be overlap—or at least substantial interaction—between the team(s) tasked with developing the Five-Year Action Plan, Initial Proposal, and Final Proposal for BEAD and those tasked with developing the State Digital Equity Plan. At a minimum, this should include formal and direct communication and collaboration pathways between the teams that remain in place throughout the entire planning process. As a best practice, Eligible Entities (BEAD) and Administering Entities (DE Planning) should establish one unified team that is developing the BEAD Five-Year Action Plan and the State Digital Equity Plan. However, in the case that two separate teams are involved, there are other ways to ensure continuous collaboration.

For Example:

- *Include at least one member of the BEAD planning team on the State Digital Equity planning team*
- *Include at least one member of the DE planning team on the BEAD planning team*
- *Establish a clear process to share information gathered from stakeholders across the team(s), given the interconnected nature of availability and adoption*
- *Ensure that DE planning progress is shared on recurring BEAD meetings and vice versa, to ensure frequent opportunities for knowledge sharing and streamlining of efforts*

Equity Throughout

Participants should integrate digital inclusion throughout the BEAD Program. BEAD funds can be used for high-speed internet adoption projects, subject to the prioritization scheme laid out in the NOFO, if eligible entities have a plan to address deployment to unserved and underserved communities. As participants develop the BEAD Five-Year Action Plan, where appropriate, they should consider where BEAD funds can support broadband adoption projects.

In addition, states should prioritize unserved and underserved areas to infuse both the Five-Year Action Plan and the Digital Equity Plan with digital equity at their cores. States can accomplish this by ensuring stakeholder engagement plans are comprehensive enough to provide a clear landscape of covered populations' access to high-speed internet. Then, states should prioritize the outputs from sessions with covered populations and those in unserved and underserved communities in formulating their plans.

For Example:

- *Ensure all employees and team members have a baseline understanding of equity as it relates to the digital divide; NTIA has resources that can be leveraged to increase understanding, including a Digital Equity Guide for States and dedicated Federal Program Officers*
- *Partner with trusted community-based organizations to assist eligible households with enrolling in the Affordable Connectivity Program (ACP) or other programs targeted to low-income consumers within BEAD-funded networks*
- *Integrate local digital inclusion programming into their outreach initiatives*
- *Prioritize outreach in low-income neighborhoods, particularly historically disconnected communities*

Cohesive Stakeholder Engagement

All local coordination, stakeholder engagement, and outreach—including with tribal and native entities– should be coordinated early on and done in tandem for both the BEAD Program and the DE Planning Program to fulfill the requirements of both programs. Conducting outreach as a cohesive effort for the two programs will reduce the burden and confusion on community stakeholders.

For Example:

- *Assemble comprehensive lists of stakeholders, identify overlaps, and coordinate or combine outreach to those stakeholders*
- *Plan & host combined listening sessions, surveys, and site visits*

Coordinated Data Collection and Asset Mapping

Data collection to understand the current maturity of state broadband programs, office staff, and digital inclusion efforts is a key aspect of both the Five-Year Action Plan and Digital Equity Plan. Coordinating or sharing outcomes from data collection will be key to reaching a consensus on where and why gaps in adoption exist.

For Example:

- *Develop surveys and conduct asset mapping in tandem; the inventory should include current resources, programs, and strategies that promote digital inclusion for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments*
- *Ensure that BEAD teams are collecting data from stakeholders with a strong understanding of how equity concerns impact the digital divide; this can be accomplished by including a member of the team engaged in developing the Digital Equity Plan*
- *Create a matrix (or another tool) to assess the eligible uses of all available funding and to identify and coordinate the funding that can be utilized to support digital inclusion strategies*
- *Note any specific digital inclusion efforts; existing funds may come from agencies like Institute of Museum and Library Services (IMLS), Appalachian Regional Commission (ARC), or the USDA. Other sources could include the Coronavirus Aid, Relief, and Economic Security (CARES) Act, the American Rescue Plan Act (ARPA), or the Universal Service Fund (USF).*

Aligned Plan Development

Aligning the goals and strategies of the BEAD Five-Year Action Plan and the State Digital Equity Plan will increase the impact of both. Both plans aim to close the digital divide, and must address digital equity. Ensure their methods are well integrated.

For Example:

- *Build on BEAD's required low-cost service programs in the State Digital Equity Plan*
- *Convene leaders who will develop the Five-Year Action Plan and Digital Equity Plan at the start of the grant period to coordinate activities and strategies for plan development (1-2 months in)*
- *Connect regularly (e.g., bi-weekly or monthly) to track progress on overlapping activities (stakeholder engagement, asset mapping, data collection)*
- *Schedule time/space to review the Five-Year Action Plan and Digital Equity Plan draft 1-2 months prior to Five-Year Action Plan due date to ensure alignment and integration*

Requirements of Five-Year Action Plan and State Digital Equity Plan

The Five-Year Action Plan and the State Digital Equity Plan—the first outputs of the BEAD and DEA Programs, respectively—must adhere to specific requirements in each NOFO.[1] In many of the 13 requirements for the Five-Year Action Plan, there are opportunities to infuse digital inclusion activities to both satisfy requirements for the State Digital Equity Plan and ensure that digital inclusion is a core component of high-speed internet planning.

The tables below detail Five-Year Action Plan requirements and corresponding digital inclusion activities that are complementary. These activities are recommended to be undertaken simultaneously and/or through a singular effort by the same team.

The clearest connection between the Five-Year Action Plan and the State Digital Equity Plan is Requirement #11 for the Five-Year Action Plan (see below). This requirement may be satisfied by completing the State Digital Equity Plan. Thus, participants can and should develop both plans concurrently. Participants should submit a draft Digital Equity Plan within the Five-Year Action Plan and then submit the expanded, final State Digital Equity Plan as a standalone document under the DE Planning Program. Additionally, the Five-Year Action Plan should encapsulate any relevant tribal digital equity plans in order to present a holistic view of efforts to close the digital divide.

Five-Year Action Plan Requirement	**Digital Equity Plan Requirement**
#7 External Engagement[2] Detail external engagement process, demonstrating collaboration with local, regional, and Tribal (as applicable) entities (governmental and non-governmental).	• A description of how the State plans to collaborate with key stakeholders in the State[3] • A list of organizations with which the Administering Entity for the State collaborated in developing the Plan[4] • A coordination and outreach strategy, including ongoing engagement with representatives of each category of covered populations within the State and with the full range of stakeholders within the State[5]
Recommended Actions: ❑ Create comprehensive stakeholder engagement plans and timelines that account for both BEAD and DE Planning Program outreach, ensuring balance in the stakeholder outreach and coordination of program-specific outreach activities. ❑ The Five-Year Action Plan developed using Initial Planning Funds from the BEAD program must be informed by collaboration with Tribal entities as applicable. It is the responsibility of the Eligible Entity under the BEAD program and a state's Administering Entity for the State Planning Grant to understand the landscape of tribal and native entities to coordinate with & initiate stakeholder communication. Tribal	

[1] BEAD Program NOFO Section IV.B.3.b; *see also* SDEG Program NOFO Section IV.C.1.b.
[2] BEAD Program NOFO Section IV.B.3.b.7.
[3] SDEG Program NOFO Section IV.C.1.b.i.4.
[4] SDEG Program NOFO Section IV.C.1.b.i.5.
[5] SDEG Program NOFO Section IV.C.1.b.ii.4.

entities are also eligible to create their own digital equity plans through the State Digital Equity Planning Grant; State Digital Equity Planning Grant funding may be used to create Tribal digital equity plans and/or to support Tribal participation in the creation of relevant State Digital Equity Plans. BEAD Five-Year Action Plans should aim to encapsulate not only State Digital Equity Plans but also any relevant tribal digital equity plans in order to present a holistic view of efforts to close the digital divide.

Five-Year Action Plan Requirement	Digital Equity Plan Requirement
#11 Digital Equity & Inclusion Needs[6] Provide digital equity and inclusion needs, goals, and implementation strategies, including ways in which the Eligible Entity plans to utilize BEAD funding, Digital Equity Act funding, and/or other funding streams in concert to remedy inequities and barriers to inclusion. Be sure to include: ❑ Results of a needs assessment for underrepresented communities ❑ Asset inventory of ongoing digital equity activities, Detailed explanation of holistic strategies around affordability, devices, digital skills, technical support, and digital navigation.	• A stated vision for digital equity[7] • A digital equity needs assessment, including each State's identification of the barriers to digital equity faced generally and by each of the covered populations in the State[8] • An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments[9] • A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan[10] • A holistic implementation strategy that addresses affordability, devices, digital skills, technical support, and digital navigation, with core activities that address the needs of covered populations[11] • An explanation of how the implementation strategy addresses gaps in existing state, local, and private efforts to address the barriers identified[12] • A timeline for implementation of the plan[13]

[6] BEAD Program NOFO Section IV.B.3.b.11
[7] SDEG Program NOFO Section IV.C.1.b.ii.1
[8] SDEG Program NOFO Section IV.C.1.b.ii.2
[9] SDEG Program NOFO Section IV.C.1.b.ii.3
[10] SDEG Program NOFO Section IV.C.1.b.ii.5
[11] SDEG Program NOFO Section IV.C.1.b.ii.6
[12] SDEG Program NOFO Section IV.C.1.b.ii.7
[13] SDEG Program NOFO Section IV.C.1.b.ii.9

	• A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the BEAD Program, other federal, or private digital equity funding[14]
Recommended Actions: ❑ Develop a comprehensive stakeholder engagement plan that will provide a full view of ongoing high-speed internet infrastructure and adoption programs within the State, ensuring that they are collecting data from stakeholders with a strong understanding of how equity concerns impact the digital divide; compare and combine any overlapping outreach efforts ❑ Combine outreach to state and local agencies in economic development, health, education, etc. to drive alignment across BEAD and DE programs ❑ Identify common objectives and metrics to measure progress on outcomes, including linking program success metrics through assessing how digital education and adoption programs funded through the Digital Equity Capacity Grant Program impact adoption funded by the BEAD Program	

Five-Year Action Plan Requirement	**Digital Equity Plan Requirement**
#12 Plan Alignment[15] Detail alignment of the Five-Year Action Plan with other existing and planned economic development, telehealth, workforce development, related connectivity efforts, and other Eligible Entity priorities.	• An assessment of how the measurable objectives will impact and interact with the State's: a. Economic and workforce development goals, plans, and outcomes; b. Educational outcomes; c. Health outcomes; d. Civic and social engagement; and e. Delivery of other essential services[16] • A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with: a. Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations; b. Labor organizations and community-based organizations; and c. Institutions of higher learning, including but not limited to four-year colleges and universities,

[14] SDEG Program NOFO Section IV.C.1.b.ii.10
[15] BEAD Program NOFO Section IV.B.3.b.12
[16] SDEG Program NOFO Section IV.C.1.b.i.3

	community colleges, education and training providers, and educational service agencies[17]

Recommended Actions:

- ❑ Develop an outreach plan to state and local agencies in economic development, health, education, etc. with alignment from BEAD and DE team(s) on points of discussion and coordination between existing and planned efforts
- ❑ Identify common objectives and metrics to measure progress on outcomes
- ❑ Given that a skilled workforce is critical to meeting infrastructure buildout timelines under the Infrastructure Act, BEAD funding recipients are allowed to allocate grants for training and workforce development. States should consider within their Five-Year Action Plans and Digital Equity Plans how they will advance equitable workforce development. In addition, states should look to understand how entities that carry out workforce development programs could be engaged to inform the Five-Year Action Plan and Digital Equity Plan, and streamline that engagement.

Funding Uses for the BEAD and DE Planning Programs

Similar to the requirements for the Five-Year Action Plan and the State Digital Equity Plan, the eligible uses of funds across the two programs overlap. States should establish practices that ensure proper accounting, as states cannot duplicate expenses for the same line item. Understanding where eligible uses for funds overlap is critical to maximizing how funds are spent.

The table below lists activities the Initial Planning Funds can be used for (*see* Section IV.B.2 of the BEAD NOFO) and indicates which activities complement digital equity plan development.

Eligible Uses for BEAD Initial Planning Funds	Complementary Activity for DE Plan Development
Research and data collection, including initial identification of unserved locations and underserved locations consistent with the rules, regulations, and processes the Federal Communications Commission has established for making these determinations in the Broadband DATA Maps	✓
The development of a preliminary budget for pre-planning activities	
Publications, outreach, and communications support related to planning, deployment, mapping, equity and adoption	✓
Providing technical assistance to potential subgrantees, including through workshops and events	✓
Training for employees of the broadband program or office of the Eligible Entity or employees of political subdivisions of the Eligible Entity, and related staffing capacity or consulting or contracted support to effectuate the goals of the BEAD Program	✓

[17] SDEG Program NOFO Section IV.C.1.b.ii.8

Eligible Uses for BEAD Initial Planning Funds	Complementary Activity for DE Plan Development
Establishing, operating, or increasing capacity of a state broadband office that oversees programs and deployment in an Eligible Entity	✓
Asset mapping across the Eligible Entity to catalogue broadband adoption, affordability, equity, access and deployment activities occurring within the Eligible Entity	✓
Conducting surveys of unserved, underserved, and underrepresented communities to better understand barriers to adoption	✓
Costs associated with meeting the local coordination requirements, including capacity building at the local and regional levels or contracted support	✓
Reasonable post-NOFO, pre-Initial Planning Funds expenses in an amount not to exceed $100,000 relating to the preparation of program submissions to NTIA (such as the Letter of Intent) or adding additional capacity to State or Territorial broadband offices in preparation for the BEAD Program may be reimbursed if they are incurred after the publication date of this NOFO and prior to the date of issuance of the grant award from NTIA	
Other uses approved in advance writing by the Assistant Secretary (including in response to an Eligible Entity's request) that support the goals of the Program	

Meanwhile, Section IV.C.1.a of the DE Planning Program NOFO details the two allowable uses of State Digital Equity Planning Grant Funds, which are:

- To develop the State Digital Equity Plan for the State, and
- To make subgrants to eligible entities to assist in the development of the State Digital Equity Plan of the State