



**ConnectLA**

Louisiana Office of Broadband  
Development & Connectivity

An aerial photograph of the New Orleans skyline, featuring the Mississippi River, the French Quarter, and the New Orleans Morialais Convention Center. The image is overlaid with a dark teal tint.

# **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 (8<sup>th</sup> largest in the country and 10<sup>th</sup> 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.

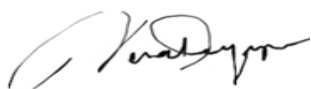
The quote from the Governor couldn't have better captured the importance of how having broadband access is foundational to our state's societal well-being. He challenged us often over the years that develop the best set of programmatic non-deployment plans to ensure we create education-to-employment 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 Final 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.

## Version History

Version	Date	Changes
1.0	11/18/2024	Draft version released for public comment
2.0	12/12/2024	Updated to incorporate NTIA initial review comments and updated NTIA Final Proposal Guidance v1.2 Draft version pending NTIA approval
3.0	12/18/2024	Final draft pending NTIA approval (updates for clarity, consistency and detail in sections 8.3, 8.7, and 8.8).
4.0	12/21/2024	Final draft pending NTIA approval (updates for clarity, consistency and detail in section 1.1)
5.0	01/09/2025	Final approved version

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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
EHCPLT	Extremely High-Cost Per Location Threshold
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

## Final Proposal Data Submission

### 0.1 Supporting Documentation for Subgrantees

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

See Exhibit A.

### 0.2 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.

### 0.3 Supporting Documentation for Locations

Complete and submit the Locations CSV file (named "*fp\_locations.csv*") using the NTIA template provided. The Locations IDs in this must match the approved final list from the Eligible Entity's Challenge Process results (i.e., the fabric version selected).

See Exhibit C.

### 0.4 Supporting Documentation

Does the Eligible Entity certify that it will ensure coverage of broadband service to all unserved and underserved locations within its jurisdiction, as identified upon conclusion of the Challenge Process, but one or more of these locations will not be served through a BEAD project?

Yes.

### 0.5 Supporting Documentation for No BEAD Locations

Complete and submit the No BEAD Locations CSV file (named "*fp\_no\_BEAD\_locations.csv*") using the NTIA template provided. The Location IDs in this list must match the approved final list from the Eligible Entity's Challenge Process results (i.e., the fabric version selected).

See Exhibit D.

### 0.6 Supporting Documentation

If the Eligible Entity intends to use BEAD funds to serve CAIs, does the Eligible Entity certify that it ensures coverage of broadband service to all unserved and underserved locations, as identified upon conclusion of the Challenge Process required under 47 U.S.C. § 1702(h)(2)?

Yes.

### 0.7 Supporting Documentation for CAIs

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. The Eligible Entity must only include the CAIs funded via BEAD in this list; the identification of CAIs in this list must match the approved final list from the Eligible Entity's Challenge Process results.

See Exhibit E.

## 0.8 Supporting Documentation

**Is the Eligible Entity conducting non-deployment projects?**

Yes.

## 0.9 Supporting Documentation for Non-Deployment Projects

If 'Yes' [to Intake Question 0.8], the Eligible Entity is conducting non-deployment projects, complete and submit the Non-Deployment Projects CSV file (named "*fp\_non\_deployment\_projects.csv*") using the NTIA template provided.

See Exhibit F.

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

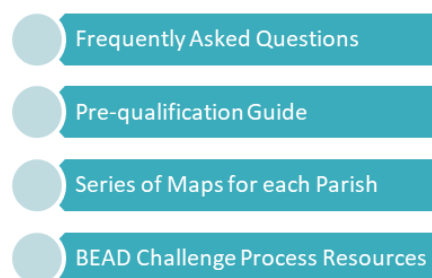
### 1.1 Consistency with Initial Proposal Volume II

**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 July 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 29, 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. Per Section 2.4.7 of the IPv2, ConnectLA “reserves the right to administer additional competitive grant rounds in order

to achieve the goals of BEAD and ensure 100% of all BSLs in the State.” Based on this, ConnectLA launched a “Direct Negotiation” round to identify qualifying providers of any technology type to serve the unawarded BSLs (whether due to not receiving a bid or deconfliction) following completion of Round 2. ConnectLA utilized the same Application Portal from Round 1 & 2 as a convenient mechanism to run an orderly direct negotiation process. Reference Funding Amounts (RFAs) were increased for all SPAs from Round 1 levels if they were not already increased in Round 2. The updated RFA levels were made available in advance of the opening of the direct negotiation process. Direct negotiations began with the submission of offers for available SPAs following the same procedures for application submission as Round 1. Such offers were binding if provisionally selected for award. All offers submitted during the direct negotiation round were required to include full scoring information. The state did not, however, make selections solely on scoring and deconfliction rules as was the case for Rounds 1 and 2. Instead, the state either (a) provisionally selected an offer for award, or (b) engaged 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 an offer, the state sought to maximize the number of locations covered by available and revised offers to provide Priority and Reliable Broadband Service in light of all options available for a given SPA and the relative scores of similar applications.

The direct negotiation window opened October 14, 2024, and closed October 17, 2024. Interested parties were required to submit their offers during this window. ConnectLA reserved the right to engage in negotiations past the close of this window with any provider that makes an offer while the window is open.

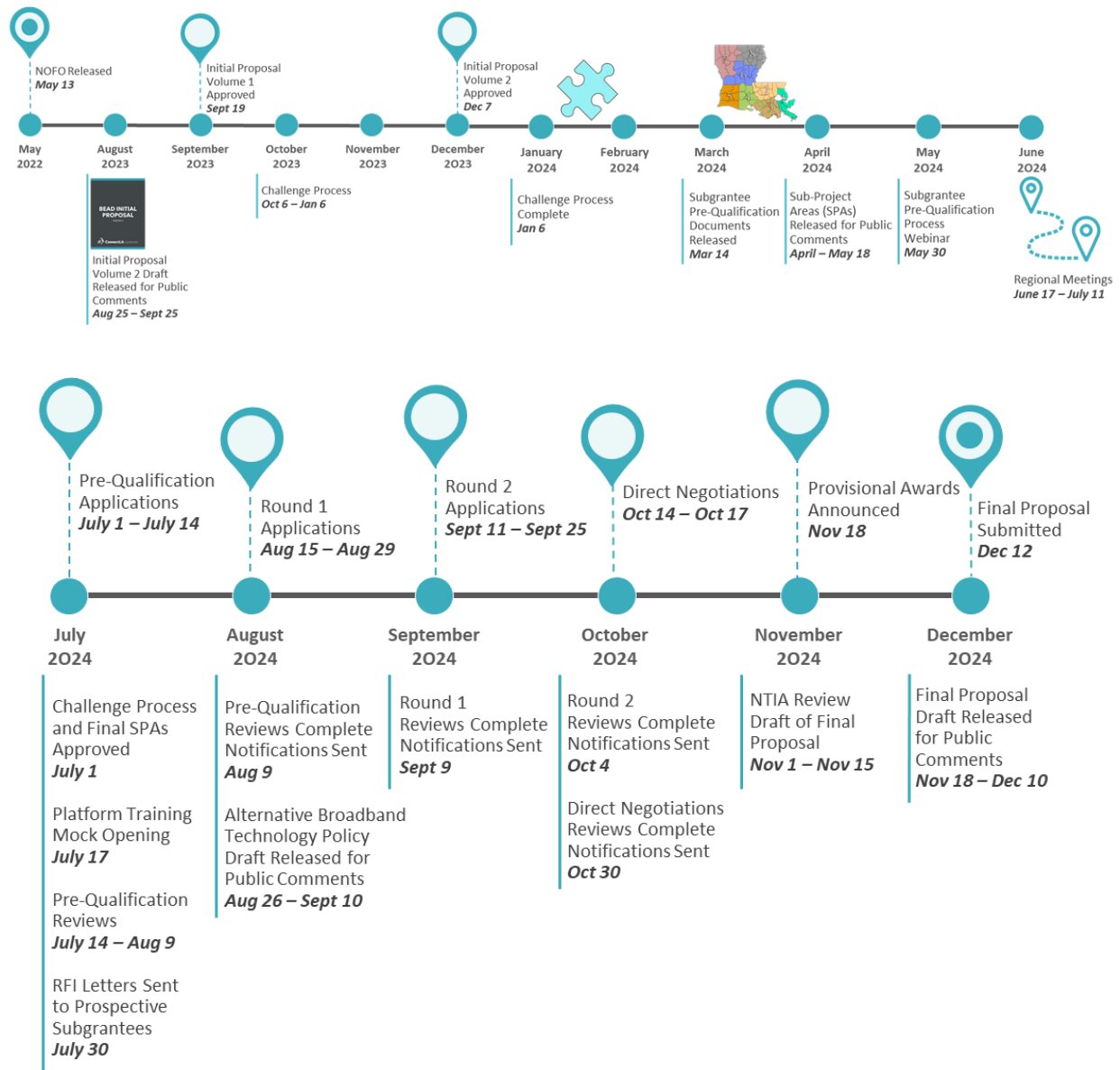
ConnectLA conducted a final review of selected proposals to confirm that the total set of awards to each prospective subgrantee is consistent with the financial, operational and managerial capabilities submitted in the pre-qualification process, confidentially engaging with specific providers if needed 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.

<b>Application Submission &amp; Review Timelines</b>	<b>Date</b>
Pre-qualification Window Opened	July 1, 2024
Pre-qualification Window Closed	July 14, 2024
<b>Pre-qualification – All selection activities complete &amp; Pre-qualification determination letters sent to applicants</b>	<b>August 9, 2024</b>
Round 1 Window Opened	August 15, 2024
Round 1 Window Closed	August 29, 2024
<b>Round 1 – All selection activities complete &amp; all preliminarily selected applicants notified</b>	<b>September 9, 2024</b>
Round 2 Window Opened	September 11, 2024
Round 2 Window Closed	September 25, 2024
<b>Round 2 – All selection activities complete &amp; all preliminarily selected applicants notified</b>	<b>October 4, 2024</b>
Direct Negotiation Window Opened	October 14, 2024
Direct Negotiation Window Closed	October 17, 2024
<b>Direct Negotiation – All selection activities complete &amp; all preliminarily selected applicants notified</b>	<b>October 30, 2024</b>

**Provisional Award Date – Coincides with Final Proposal draft released for public comment**

**November 18, 2024**

ConnectLA’s subgrantee selection process sequence of events and timeline remained consistent with the approved IPv2.



Following completion of subgrantee selection and analysis, it was determined that 184 Community Anchor Institutions (CAIs) did not receive fiber bids. Other locations without bids were assigned to alternative technologies; however, these technologies are unlikely to meet the BEAD NOFO’s performance requirements of 1 Gbps upload and download speeds for CAIs (see BEAD NOFO pg. 65 & § 60401(e)(3)(C) of the Infrastructure Act). Consequently, ConnectLA chose to remove these 184 CAIs from consideration for funding. According to Section 2.4.4 of the IPv2, ConnectLA intended to prioritize serving all eligible CAIs before allocating BEAD funds to non-deployment projects. At the time of IPv2, ConnectLA was

confident that all CAIs would receive bids; however, due to the lack of bidder interest, these CAIs were ultimately excluded.

## 1.2 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 that 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.

To ensure that reviewers were adequately trained, qualified, and objective, ConnectLA implemented the following steps:

**1. Engaging External Reviewers for Specialized Support**

- a. Due to the small size of ConnectLA's staff (four positions, one of which remained unfilled until late October 2024), ConnectLA contracted external reviewers to assist with the subgrantee selection process.
- b. Contracted reviewers possessed extensive experience in program management and monitoring federally funded programs for other state agencies within Louisiana.
- c. The team comprised individuals with diverse expertise, including compliance, financial analysis, technical assessment, and operational management.
- d. ConnectLA assessed reviewers' qualifications and potential conflicts of interest by:
  - i. Evaluating resumes.
  - ii. Conducting background checks.
  - iii. Requiring completion of disclosure of interest forms and end-user agreements.

**2. Expertise-Based Review Process**

During the pre-qualification review, ConnectLA assigned specific questions to reviewers based on their expertise:

- a. **Financial capability questions** were reviewed by individuals with relevant financial experience.
- b. **Organizational capability questions** were reviewed by individuals experienced in organizational management.
- c. **Technical capability questions**, including network designs, speed and latency estimates, were evaluated by professionals with expertise in the internet and telecom industry and federal programs.
- d. **Legal and ownership-related questions**, including federal labor and employment laws and national laws, were reviewed by lawyers.
- e. **Risk management questions**, such as cybersecurity and supply chain risk management plans, were assessed by IT professionals knowledgeable about these requirements.

**3. Final Review by ConnectLA Staff**

- a. After the reviewers completed their assessments, ConnectLA staff conducted a final review of all questions.
- b. The staff then made determinations based on the reviewers' evaluations and recommendations.

These measures ensured that the review process was thorough, unbiased, and conducted by qualified professionals, thus maintaining the integrity of the subgrantee selection process.

## **1.3 Information on Applications**

**Affirm that, when no application was initially received, the Eligible Entity followed a procedure consistent with the process approved in the Initial Proposal.**

**If there was a divergence, explain how the process that was conducted; diverged from the approved process.**

**When there were initially no applications to serve a location or group of locations that are unserved and underserved, the Eligible Entity must affirm that it followed a procedure consistent with the process approved in the Initial Proposal.**

ConnectLA hereby affirms that when no application was initially received, it followed a procedure consistent with the process approved in the IPv2. Additionally, ConnectLA affirms that when there were initially no applications to serve a location or group of locations that are unserved or underserved, it followed a procedure consistent with the process approved in the IPv2.

As described in Section 1.2 above, 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. Per IPv2 Section 2.4.7, ConnectLA “reserves the right to administer additional competitive grant rounds in order to achieve the goals of BEAD and ensure 100% of all BSLs in the State.” Based on this, ConnectLA launched a “Direct Negotiation” round to identify qualifying providers of any technology type to serve the unawarded BSLs (whether due to not receiving a bid or deconfliction) following completion of Round 2.

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

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 round 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 began with the submission of offers for available SPAs following the same procedures for application submission as Round 1. Such offers were considered binding if provisionally selected for award.

All offers submitted during the direct negotiation round were required to include full scoring information. The state did not, however, make selections solely on scoring and deconfliction rules as was the case for Rounds 1 and 2. Instead, the state either (a) provisionally selected an offer for award, or (b) engaged 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 took 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.

#### ***BEAD Summary of Participation by Round***

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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>

## 1.4 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.**

At the conclusion of Round 2, ConnectLA assessed all bids received and set the Extremely High Cost Per Location Threshold(s) (EHCPLT) to \$100,000.

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.

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.



## 1.5 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.

## 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 its non-deployment projects through Memorandums of Understanding (MOU) with 9 state agencies, 5 of which will run a competitive application process and 4 of which will directly implement their programs. The full details of the relevant agencies and approach to projects 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, hitting milestones, and meeting 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, 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, annually, etc. The table above details the timeline from Q4 2024-Q4 2025. Sample activities / milestones leading up to subgrantee selection will vary between programs, but may include:

1. Preparation phase (Q4 2024-Q1 2025)
  - a. Refine program guidelines and evaluation criteria
  - b. Develop application portal
  - c. Engage external program stakeholders (e.g., companies, researchers)
  - d. Launch statewide marketing and outreach campaign
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 (Q2 2025)
  - a. Review and select eligible applications
  - b. Notify eligible applicants of program details

ConnectLA hereby affirms that pursuant to BEAD non-deployment requirements, all subgrant activities will be completed at least 120 days prior to the end of the period of performance. Additionally, all non-deployment subgrants will be completed within four years of the receipt of the subgrant.

### 3.2 Subgrantee Monitoring

**Has the Eligible Entity taken measures 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 the end of the Eligible Entity’s period of performance, 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 the end of the period of performance for its award, in accordance with 2 C.F.R. 200.344.**

ConnectLA hereby affirms that it will ensure that each BEAD subgrantee will begin to provide services to customers that desire broadband service within the project area not later than four years after the date on which the subgrantee receives the subgrant. Additionally, 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 hereby affirms that it 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 hereby affirms that it 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 hereby affirms that it 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 hereby affirms that it will prepare a closeout agreement and submit it to all subgrantees for execution and ensure that all BEAD-funded subgrant activities are completed at least 120 days prior to the end of ConnectLA's period of performance, in accordance with 2 C.F.R. 200.344; and ensure that all programmatic BEAD grant activities undertaken by ConnectLA are completed by the end of its own period of performance, 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, and a plan to publicize the contact information for this 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 3 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](#)

All contact information for ConnectLA's public waste, fraud, and abuse hotline as well as the 3 statewide oversight agencies' hotlines were publicly posted on ConnectLA's website on October 2, 2024, and will remain on the website indefinitely.

### 4.2 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 G – BEAD Monitoring Plan.

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

### 4.3 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 H for Draft Subgrant Agreement.

## 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](https://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](#)



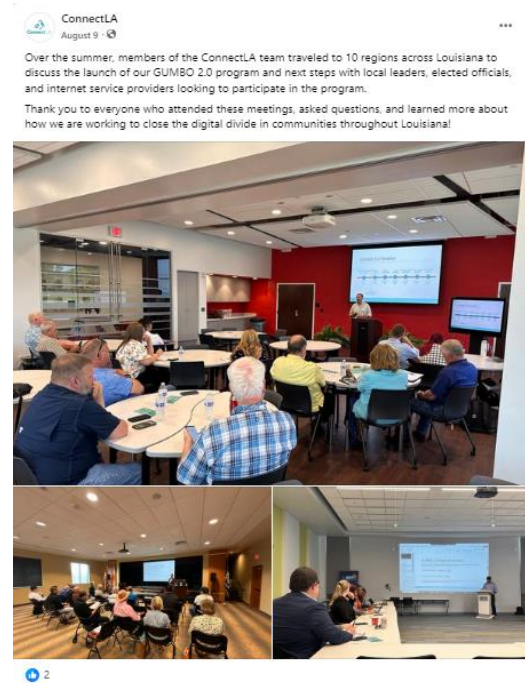
- Communications Daily: [La. Is First State to Get Full Bead Plan Approval](#)
- Broadband Communities News: [Louisiana becomes first state to get NTIA approval for initial Bead program proposal](#)
- WDSU: [Louisiana Gov. Jeff Landry announces launch of largest broadband expansion in state history](#)
- 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
Totals	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.

### Publication and Notification of Application Round(s)

Prior to Round 1 of the application process opening, Governor Jeff Landry held a press conference on August 19, 2024, publicizing the start of the BEAD application process. Additionally, ConnectLA posted information on its website prior to the opening of all application rounds. Lastly, all entities who were pre-qualified to participate in the BEAD application process were notified via email that the Rounds were opening. Reminders were also sent to all applicants via email prior to closing of Rounds.

In order to inform the public about the Direct Negotiation Process, ConnectLA released and published to its website Supplemental Notice – Version 4.0<sup>1</sup> (SNv4) on October 4, 2024, following completion of selection activities for Round 2, which provided the following:

1. Summary of bidding round results to-date;
2. Information on the process and timing of the GUMBO 2.0 “direct negotiation” process; and,
3. Information on the process and timing of the GUMBO 2.0 Alternative Technology subgrant selection process.

### Public Comment Period on Final Proposal

See Section 17.3 for a description of ConnectLA’s public comment period on Final Proposal.

## 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 I.

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<sup>1</sup> <https://connect.la.gov/media/ktabtr33/supplemental-notice-v4-0-10-4-24-final.pdf>

## 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.

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

### 7.1 Certification of Broadband Service Coverage of 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 of 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 of 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.**

Not applicable.

### 7.4 Coverage of 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.**

Not applicable.

### 7.5 Coverage of 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).**

Yes. 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).

### 7.6 Coverage of 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.**



Yes. ConnectLA certifies 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), through a BEAD project.

## 7.7 Universal Coverage of Underserved 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 underserved locations.**

Not applicable.

## 7.8 Universal Coverage of Underserved 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 underserved locations.**

Not applicable.

## 7.9 Certification of Documentation of Unserved or Underserved Locations

**Certify that the Eligible Entity will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project. The documentation for each location must be relevant for the specific reason indicated by the Eligible Entity in the *fp\_no\_BEAD\_locations.csv* file. The Eligible Entity shall provide the documentation for any such location for NTIA review, as requested during Final Proposal review or after the Final Proposal has been approved.**

Yes, ConnectLA hereby certifies that it will maintain documentation, following the guidelines provided by NTIA, to justify its determination if there is a reason to not serve any unserved or underserved location on the NTIA-approved Challenge Process list through a BEAD project.

See Exhibit D.

## 7.10 Coverage of 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.**

Yes, 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, in its list of proposed projects.

## Section 8 Non-Deployment Uses (Requirement 8) & Non-Deployment Subgrantee Selection (Requirement 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 4 non-deployment projects without making a subgrant.

For the following projects, ConnectLA, as the Eligible Entity, plans to directly award non-deployment funding to the respective state agency leads via a Memorandum of Understanding (MOU), which should be considered by NTIA as ConnectLA pursuing these projects directly.

ConnectLA has identified these as direct implementation since the recipient agencies are the only entities in the state of Louisiana with the ability to implement the program in a way that can achieve state-wide impact. The funds will be directly administered by the recipient agency via one of its institutions. Through direct implementation, these agencies will also be able to better coordinate efforts across their respective institutions to achieve greater scale and collaboration.

Agency	Investment Area	Details	BEAD Allocation
Louisiana Department of Administration	1. Underground utility location and management	Comprehensive mapping of critical infrastructure networks across state	\$50M
Louisiana Board of Regents	2. Increase graduates in digitally-focused degrees	Expand capacity for post-secondary degrees and credentials in high-demand occupations	\$50M
Louisiana Department of Public Safety & Corrections	3. Transitional work training	Expand work-based learning opportunities to build skills, incl. digital literacy	\$20M
LSU AgCenter	4. Precision agriculture	Create comprehensive ecosystem for IoT-based farm digitization	\$20M

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

The Department of Administration's *Underground Utility Location and Management* initiative 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 parishes. This will allow the state to identify potential conflicts and resolve them during the preconstruction phase of broadband deployment. Additionally, this initiative 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 used to supplement several existing DOA programs/activities:

- a. **STRIKE System for Utility Management:** The plan will supplement 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 will 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 initiative 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 overlayed 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.
- e. **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 initiative directly without making a subgrant to ensure operational efficiency, as the initiative's 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.

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## 2. Increase graduates in digitally-focused degrees (LBOR)

The Board of Regents' *Increase graduates in digitally-focused degrees* initiative aims to increase 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 critical areas can support digital jobs and enable greater health outcomes across the state. Non-deployment funding allocated to BOR will supplement several existing BOR programs/activities:

- a. **Launch new programs:** Supplement existing BOR funding to support setup of new degree and credentialing programs for in-demand, digitally-focused areas, including computer science, and telehealth, at institutions that do not offer these programs
- b. **Incorporate digital skills into existing programs:** Support higher education institutions by revising existing curricula to help equip more graduates with digital skills, and / or embedding digital training within curricula, esp. 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. **Conduct marketing for programs:** Launch outreach / public awareness 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 (e.g., Louisiana Community and Technical Colleges System (LCTCS), Louisiana State University System, Southern University System, and University of Louisiana System) will be eligible for support under this program. Board of Regents plans to supplement several existing programs as part of this initiative, including:

- **Nursing and Allied Health Telehealth Nexus Degree Programs:** Work with institutions with 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 higher education-provided training to existing health care providers through a short-term program or nexus degree to operate telehealth services
  - Embed telehealth training in institutions through existing allied health programs or supplemental training offered across the state to equip graduates to participate in these health care access programs, esp. in rural communities
  - Launch a public awareness campaign through health science centers, campus allied health programs, and rural sites (e.g., Ag extension centers, public libraries) to educate people about telehealth; establish telehealth community sites, esp. 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 because of high-cost faculty and equipment. Louisiana Cyber Academy will be able to deliver co-created cyber courses to students at institutions across the state 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:** 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 a high need of medical professionals and low health outcomes will be identified so that telehealth training can be provided. Regents' institutions could also support or participate in a public awareness campaign showing the value of telehealth and "how to guides" on using telehealth, as well as assisting with community telehealth site selection and establishment of sites.

This initiative 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 34 members of the four higher education systems under the Board of Regents (e.g., Louisiana Community and Technical Colleges System (LCTCS), Louisiana State University System, Southern University System, and University of Louisiana System) will be eligible for support under this program.

Board of Regents has experience running similar grant programs to expand capacity across the four higher education systems' institutions it oversees. Furthermore, given the variation in schools' needs, strategic goals, and current degree offerings, direct implementation will allow for BOR's easier strategic alignment and coordination amongst these groups.

Board of Regents will implement this initiative directly because it has demonstrated the sufficient level of oversight and ability to implement this program with BEAD non-deployment funding through prior experience. Furthermore, Board of Regents has been implementing much of their proposed programming (e.g., Cyber Academy, Nexus degrees) already, and is currently seeking to continue expansion to new institutions. Direct implementation will allow for rapid scaling of these programs.

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

The LDPS&C *Transitional Work Training* initiative aims to expand work-based learning opportunities for incarcerated and formerly incarcerated individuals<sup>2</sup> to enhance their 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 are digitally adjacent. Non-deployment funding allocated to LDPS&C will be directed to supplement several existing LDPS&C programs/activities:

- **Expand and Enhance Training Programs:** Supplement current work-based learning programs and the expansion of new training programs including but not limited to, many of which are digitally adjacent:
  - Cabling Technology
  - Certified Forklift Technician

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<sup>2</sup> ConnectLA notes that if the agency collects information directly from these participants, we will adhere to HSR guidance.

- Commercial Drivers' License Program
- Digital Literacy
- Fiber Optics
- Logistics Technician (MSSC)
- Microsoft Office Specialist
- National Center for Construction Education and Research (NCCER) Programs
- 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, customer service) in work-based learning programs.
- **Implement and Scale Virtual One-Stop Reentry Employment Opportunities (VOS REO):** Supplement the virtual platform to improve access to reentry employment opportunities.

This project will supplement 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 (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, helping reduce recidivism and improve employment prospects for the underserved inmate population.
- c. **Digital Expansion:** The project will also supplement digital tools (e.g., VOS REO) to reach individuals in remote areas, ensuring broader access to training.

This initiative 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***

State correctional facilities under LDPS&C's jurisdiction will be eligible for non-deployment funding to deploy transitional workforce programming. Existing LDPS&C will be supplemented through BEAD funding and LDPS&C will be able to more effectively administer the funding and facilitate coordination across institutions through direct implementation.

LDPS&C will implement this initiative without making a subgrant because LDPS&C is already executing the non-deployment initiatives it intends to support 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 Louisiana Department of Public Safety and Corrections

(DPS&C) 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 their 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) initiative will provide workforce development and innovation training to farmers to ensure that Louisiana farmers and agricultural workers are trained and equipped with the latest skills and knowledge to adopt advanced farming techniques. LSU AgCenter's 14 research stations located across Louisiana will administer programming that will provide workforce development training and training on IoT technology for the state's farmers and agricultural workers. Non-deployment funding allocated to LSU AgCenter will be used to supplement several existing programs/activities:

- **Equip Farmers with IoT Tools to support training:** Research stations will train farmers and agricultural workers on advanced equipment for monitoring crop health, water management, and soil health, which is necessary to support climate-smart agricultural practices and digital/precision agriculture initiatives. To enable this training, research stations will equip small- and medium-scale farmers and non-commodity crop producers with IoT equipment in their respective jurisdictions. IoT equipment will be purchased and not invented as part of this initiative.
- **Precision Agriculture Training:** Coordinate with 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.

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 (3) leveraging digital tools to reach facilities in remote areas.

- **Targeted outreach and inclusion:** Research stations will be encouraged to identify and conduct outreach to small-scale, non-commodity crop producers, many of whom belong to historically underrepresented communities and are 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:** Research stations 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. Research stations 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's 14 research stations located across Louisiana will be eligible to receive non-deployment funding and lead the pilot of the IDEA project.

By managing the project directly, LSU AgCenter will be able to implement this project as a statewide program, ensuring farmers in every part of the state receive training, and can allocate funding to research stations based on geographic need.

LSU AgCenter will implement this initiative without making a subgrant because – through its reach across the state and its strong existing relationships with farmers – the institution has demonstrated it has the sufficient level of oversight and ability to implement this program with BEAD non-deployment funding. 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 – 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.**

Not applicable.

## 8.6 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.

Not applicable.

## 8.7 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 6 programs that are not (f)(1) last-mile broadband deployment projects.

Agency	Investment Area	Details	BEAD Allocation
Louisiana Department of Health	1. Telehealth expansion	Support telehealth expansion through new infrastructure and broadband-enabled interventions	\$100M
Louisiana Workforce Commission	2. Job placements in digital jobs	Workforce development fund incentivizing digital training and job placement	\$100M
Louisiana Department of Education	3. Scaling digital K-12 programming	Offer digitally adjacent or virtual programs, incl. HDT; provide schools with cybersecurity support	\$100M
Louisiana Economic Development	4. Small businesses support (Main Street)	Empower small business with digital tools and resources	\$30M
Louisiana Economic Development	5. Small business support (priority industries)	Equip legacy businesses with digital tools, upskill their workforce, and support investment in new assets	\$30M
Louisiana Department of Culture, Recreation & Tourism	6. Wireless connectivity	Provide robust and reliable wireless internet access in cabins / camps of state parks	\$10M

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

Non-deployment initiatives 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 initiative 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)**

The *Telehealth Expansion* initiative 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 diseases. Proposed eligible uses for the initiative's two programs (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.
- **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 (i.e., smartphones, tablets) to high need institutions.
- **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, which will be further defined through the development of the grant application. Successful applications will provide a plan for meeting program goals of increasing telehealth access and improving health outcomes (e.g., maternal morbidity rates<sup>3</sup>) across Louisiana. Subgrantees must also satisfy geographical criteria by focusing efforts on priority regions, which include areas with recent broadband rollout facilitated by BEAD deployment, rural/underserved communities, and areas with strong opportunity to improve health outcomes (e.g., Gulf Coast region). For both tracks, this initiative will primarily focus on finding proven solutions – either through applying successful telehealth solutions from other programs (in- and out-of-state), supplementing existing solutions, and supplementing 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 initiative 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

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

The *Telehealth Expansion* initiative 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:

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<sup>3</sup> ConnectLA notes that if the agency collects information directly from these participants, we will adhere to HSR guidance.

- 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* initiative 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)**

The *Building a Broadband Ready Louisiana* initiative 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, cloud computing specialists, network architects and coordinators, fiber and wireless technicians, equipment operators).
- **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.

Louisiana Workforce Commission's (LWC's) *Building a Broadband Ready Louisiana* project is designed to prep Louisiana's workforce for the expansion of broadband infrastructure across the state. LWC will run this program through a fair, open and competitive sub-granting process as follows:

1. Louisiana's 15 local workforce boards (LWBs)<sup>4</sup> across the state's 8 regional labor market areas (RMLAs)<sup>5</sup> are eligible to submit proposals to LWC to participate in the agency's non-deployment project. LWB proposals will detail specific regional workforce needs developed through a comprehensive assessment and the LWB's plan to address those needs.
  - a. Only LWBs will be eligible for this funding because they are best positioned to understand the unique workforce needs of their regions and coordinate delivery of services to address those needs.
2. LWBs will participate in a competitive subgrant process to receive seed funding based on LWC's evaluation criteria. LWBs will be incentivized to collaborate regionally and focus on disadvantaged communities. Applications that involve multiple workforce entities working together, particularly in rural and underserved areas, will be given higher priority and scoring. The LWBs will then run individual competitive subgrant processes to procure services of workforce training and other service providers to meet the needs of regional workers and employers. These individual competitive subgrant processes will be aligned to criteria set by LWC and ConnectLA and will follow all relevant BEAD procurement guidelines.

Workforce development boards (WDBs) are defined as entities that direct federal, state, and local funding to workforce development programs. LWBs have experience participating in and drawing down WIOA funds with similar federal competitive subgrant process guidelines. Additionally, when developing their non-deployment project proposals, LWBs may elect to procure services from WIOA-designated eligible training providers (ETPs) - all as part of a fair and competitive subgrant process.

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<sup>4</sup> <https://www.careeronestop.org/LocalHelp/WorkforceDevelopment/find-workforce-development-boards.aspx?location=Louisiana>

<sup>5</sup> [https://www.laworks.net/WorkforceDev/LWDP\\_Menu.asp](https://www.laworks.net/WorkforceDev/LWDP_Menu.asp)

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This model is designed to address specific challenges in broadband workforce development, such as the digital divide and barriers to employment. The initiative will also help supplement successful elements of existing workforce development programs, such as digital skills training and regional collaboration efforts.

By building on proven strategies and expanding their reach, the initiative enhances the overall impact of Louisiana's workforce development efforts, particularly in the context of broadband expansion.

This initiative 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

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

The *Building a Broadband Ready Louisiana* initiative is expected to address needs of residents by supporting job creation in digital sectors due to broadband expansion. Individuals are expected to receive training, credentialing, and job placement services, many of whom will be from underserved communities, through 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* initiative 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 (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. **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)

The *Scaling digital K-12 programming* initiative 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<sup>6</sup> 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; supplement 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 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.

Different information will be required for school districts depending on which specific program they are applying for. Examples include:

- For high dosage tutoring, school systems can submit an application to LDOE detailing how funding will be used to provide eligible students with high dosage tutoring during the school day. Submissions should include identified students, how students will be served, approved tutoring providers, schedules, and materials used. School systems can create funding submissions and manage their budget through a centralized, digital SuperApp. Final funding allocations will be based on an equitable per-pupil distribution, ensuring schools in underrepresented and disadvantaged communities have the resources to implement high-quality tutoring and support targeted populations effectively.

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<sup>6</sup> ConnectLA notes that if the agency collects information directly from these participants, we will adhere to HSR guidance.

- For virtual programming, school systems submit a comprehensive report to LDOE detailing the specific gaps identified across the school system. This need-based approach targets students and educators in disadvantaged and underserved areas<sup>7</sup>, where advanced courses may be harder to staff, and current cybersecurity defenses may be less developed.
- For districts requesting cybersecurity protection, applicants will utilize the pre-existing SuperApp platform to submit plans for advanced firewall and staff implementation. Facilitating requests through SuperApp will ensure that all school districts will be able to equitably raise cybersecurity requests without any potential barriers from onboarding a new IT management platform. The initiative will provide funding directly for advanced firewalls in schools. Cybersecurity monitoring and awareness programs will also be offered via grant funding. These cybersecurity measures will ensure that students, regardless of their geographical location, have access to a safe and secure online learning environment.

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

- This initiative will seek to supplement and continue driving initial positive outcomes through 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 initiative is designed to improve educational outcomes specifically through bridging the digital divide for underserved students. Program activity entails virtual high-dosage tutoring sessions, direct instruction, and formative assessments 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 supplement Calcasieu Parish’s successful virtual program model to execute this initiative, where 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 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 initiative 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

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

The *Scaling digital K-12 programming* initiative is expected to address the needs of residents by providing high-need students with digital programming and support resources. [316K+] 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:

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<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>)

- 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 number of K-8 students receiving 3+ personalized lessons per week through Zearn
- 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
- Kami access for all K-12 students in 2025-2026 school year
- Improved cybersecurity infrastructure state-wide for students and staff

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

The *Scaling digital K-12 programming* initiative 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 and (3) utilizing accessible technology and (4) offering targeted outreach and assistance for rural schools.

1. **Target disadvantaged students and educators**<sup>8</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). 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 (*to be defined by LDOE*) to apply for and secure the financial resources necessary to bolster their cyber defenses. This proactive approach 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 (LED)**

The *Main Street* initiative 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

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<sup>8</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>)

resources. This will supplement existing funding for current ad-hoc small business development efforts and help LED coordinate these initiatives across the state as well as launch new programs to equip businesses with the digital skills they need. The resulting program will provide critical digital tools and digitization resources to local businesses with a particular focus on women and minority owned businesses as a recipient of these services. Key activities and programs include:

- **LSBDC 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 “Train the Trainer” program.
- **Small Business Microgrants:** Provision of microgrants for small businesses to adopt digital skills and tools (e.g., commerce solutions, AI tools, CRM software, cybersecurity solutions)
- **Small Business Services Expansion:** Supplement 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:** Generation of demand amongst small businesses through a Community of Practice for networking and peer knowledge sharing, as well as informational outreach focused on impact that digitization can have on small business operations

*Main Street* includes separate competitive application processes for 3<sup>rd</sup> party training providers, LSBDC capacity-building funding, and small business microgrants, as well as additional funding for programmatic outreach initiatives.

- 3<sup>rd</sup>-party training providers can apply for funding to support building LSBDC staff capacity as part of the “Train the Trainer” program.
- LSBDCs can apply for funding to support capacity building programs in digitalization and small business transformation.
- For small business microgrants, LED plans to first develop a list of allowable uses for microgrants (e.g., POS systems, website development tools, hardware technology purchases, cybersecurity assessments), which are expected to range from \$1,000 to \$10,000. An eligibility framework will ensure that microgrants are distributed to small, high-need businesses; potential microgrant recipients will have annual revenue limits based on business age (e.g., new businesses <2 years of registration must have annual revenues below \$20,000 to apply), will have to have a digital tool adoption/upgrade plan, and could be limited to specific high-need sectors or geographies. These criteria will be instituted to ensure funding is directed to small businesses in underserved communities that are likely in highest need of digital skills and tools.

Finally, LED will also work with delivery partners to stand up several wider outreach initiatives 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 benefits of digitization, especially in historically underserved areas where small businesses may have less experience in operating and using digital technologies.

This initiative 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

***Expected impact for Louisiana residents***

The *Main Street* Initiative 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* initiative will meet BEAD's equity, access, and deployment goals by (1) targeting priority geographies (2) offering additional supportive infrastructure in underserved communities (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 initiative 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 (LED)

The *Priority Industries* initiative aims to equip legacy businesses in key sectors<sup>9</sup>, with a priority for broadband enabled sectors, 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 broadband-enabled digital innovation and digital training investment 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 through leveraging digital tools like cloud computing and data analytics to improve business operations and productivity.
  - **Enhance opportunities for Louisiana businesses:** Build processes, systems, or pathways to engage with Louisiana small- to medium-sized businesses as contractors or suppliers of broadband-adjacent areas (e.g., telehealth, cybersecurity, defense, artificial intelligence).
- **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* initiative 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 worth \$50K to \$1M. Applicants must meet eligibility criteria to apply, including:

- 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

Organizations that meet these evaluation criteria may first submit a short Expression of Interest (EOI) form, which outlines the organization and their proposed project. LED will then review it to determine general alignment with grant objectives, including digital innovation, investment in workforce, and operation in underserved areas. LED will then invite a shortlist of organizations who meet these criteria to complete a full application form with granular details on their proposed project including a feasibility/readiness assessment, operational plan, and quantification of the expected impact for

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<sup>9</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.

disadvantaged communities. Grants awarded will typically fall into three sizes: \$50K, \$250K, and \$1M; the majority of which will be small and medium-sized grants.

Simultaneously, LED will conduct direct outreach to ensure Priority Industries initiative satisfies BEAD's equity and access goals. LED will proactively market straight to businesses to build awareness of initiative (vs. working through intermediaries such as LSBDCs in the Main Street initiative). 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 initiative 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

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

The *Priority Industries* initiative 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 \$50K, \$250K, and \$1M 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* initiative 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 (5) collaborating with community-based organizations to reach underrepresented populations.

1. **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 initiative aims to improve their local operations and expand their reach nationally, helping to bridge the digital divide and build economic growth.
2. **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.
3. **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.
4. **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.
5. **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. Wireless Connectivity (DCRT)**

The Department of Culture, Recreation, and Tourism's *Wireless Connectivity* initiative 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 promote equitable access to high-speed internet. Key activities and programs include:

- **Expand Wi-Fi coverage in parks:** Support adoption of fixed wireless repeater solutions that expand existing fiber connectivity throughout park locations frequented by visitors. DCRT will focus expanding Wi-Fi 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 Wi-Fi coverage once broadband connectivity is delivered to these locations through BEAD deployment.

This initiative 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 in Section V.H.2 of the NOFO.

#### ***Expected impacts for Louisiana residents***

The *Wireless Connectivity* initiative is expected to meet resident needs by improving the park visitation experience in Louisiana's 21 state parks, 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 parks engagement** and visitation across 21 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* initiative 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.

1. **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.
2. **Increased accessibility:** Support adoption of digital tools that can help make park visitation more accessible for people with disabilities.

## B. 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. Key opportunity areas we settled on during stakeholder conversations included:

- **Education access:** Improve tutoring and access to unique classes such as Advance Placement courses.
- **Workforce:** Increase workforce participation rate.
- **Public health:** Increase access to maternal care and behavioral health, particularly in rural and underserved areas.
- **Transition programs:** Opportunity for better educational opportunities for inmates.
- **Small business support:** Increase competitiveness of small businesses and legacy industries through improved digitization and leveraging better internet access.
- **Agriculture:** Improve competitiveness and livelihoods for the industry through better data and internet connectivity.

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 initiatives (e.g., outreach events, informational sessions)
- Host educational workshops and training programs
- Utilize regional agents in rural areas

### **C. 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 chosen through a detailed, data-driven process 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 initiatives 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 Louisianans for Digital Jobs, 3) Deliver a healthy community to all Louisianians.

During a robust stakeholder engagement process (see stakeholder engagement summary 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 6 programs identified above.

#### ***Additional fair assessment conditions***

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.

## **8.8 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.

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.
- **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 initiatives, 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.

## 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 IIJA 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 IIJA 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 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 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.

### **10.3 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.**

Not applicable.

## 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 (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment,**

ConnectLA's implementation plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment are in progress.

Since NTIA's approval of Louisiana's Initial Proposal Volume 2, ConnectLA has made the following progress related to plans described in the approved Initial Proposal Requirement 14 related to reducing costs and barriers to deployment:

#### **Streamlining permitting processes;**

In July 2024, Governor Jeff Landry signed ACT 632<sup>10</sup> into law with the following provisions related to broadband providers and municipalities.

*Coordination of broadband providers with parishes and municipalities:*

1. Broadband providers (applicants) receiving funding through the GUMBO 2.0 Program shall provide a 30-day advanced written notice before the commencement of GUMBO 2.0 construction activities to the relevant parish or municipality. Nothing in this Section relieves the GUMBO 2.0 grantee of its obligations to comply with local regulations and ordinances.

*The relevant local government subdivision may do either of the following:*

1. Require a one-time GUMBO 2.0 grant assessment for the construction and installation of GUMBO 2.0 grant-funded broadband facilities and may charge a corresponding one-time GUMBO 2.0 grant assessment fee not to exceed \$1,000.
2. Require a permit for construction and installation of GUMBO 2.0 grant-funded broadband facilities and may charge a corresponding one-time permit fee not to exceed \$1,000.

To ensure municipalities understand the provisions of ACT 632 regarding permitting, ConnectLA sent letters to all 64 Parish Presidents in Louisiana. The letters detailed the Internet Service Providers awarded in each parish and outlined the actions municipalities may take concerning permits.

### 11.2 Labor Activities

**Provide the Eligible Entity's implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 11 related to labor activities. Affirm that the Eligible Entity applied the labor-related criterion in its Subgrantee Selection Process and will ensure subgrantees comply with federal labor and employment laws.**

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<sup>10</sup> <https://legis.la.gov/legis/ViewDocument.aspx?d=1382361>

ConnectLA's implementation plans described in the approved Initial Proposal Requirement 11 related to labor activities are in progress.

ConnectLA hereby affirms that it applied the labor-related criterion in its Subgrantee Selection Process and will ensure subgrantees comply with federal labor and employment laws.

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 (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 12 related to workforce development.**

ConnectLA's implementation plans described in the approved Initial Proposal Requirement 12 related to workforce development are in progress.

In an effort to ensure these plans are implemented, ConnectLA continues to work with various agencies within the state of Louisiana who are involved in workforce development.

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

**Affirm that 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.**

ConnectLA hereby affirms that 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.

Additionally, all subgrantees were required to submit signed certifications to ConnectLA stating the subgrantee will:

1. Comply with the requirements set forth in 2 CFR §200.321, concerning contracting with small businesses, minority businesses, women's business enterprises, veteran-owned businesses, and labor surplus area firms;
2. Require all contractors, subcontractors, and subgrantees under our awards to provide their own certifications of compliance with 2 CFR §200.321 as part of our agreements; and,
3. Monitor compliance with these requirements and take appropriate corrective action in the event of non-compliance by our contractors, subcontractors, or subgrantees.

## 11.5 Certification Related to Low-Cost Broadband Service

**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.**

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 (Complete, In Progress, or Not Started) of plans described in the Eligible Entity's approved Initial Proposal Requirement 15 related to climate change and resilience.**

ConnectLA's implementation plans described in the approved Initial Proposal Requirement 15 related to climate change and resilience are in progress.

Since NTIA's approval of Louisiana's Initial Proposal Volume 2, the following document has been updated:

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

## 11.7 Middle-Class Affordability

**Provide the implementation status (Complete, In Progress, or Not Started) of plans described in the approved Initial Proposal Requirement 20 related to middle-class affordability.**

ConnectLA's implementation plans described in the approved Initial Proposal Requirement 20 related to middle-class affordability are in progress.

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.

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

### 12.1 Deployment of Priority Broadband Projects

**Describe 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.**

In order to maximize deployment of Priority Broadband Projects, ConnectLA followed the process described in IPv2 Section 2.4.2. 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>11</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 was provisionally awarded for all included SPAs at the total requested overall funding level. ConnectLA then reviewed 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>12</sup>. This approach expressly implements the BEAD requirement that FTTH applications are always selected over non-FTTH applications, subject only to the EHCPLT 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 were 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 received a higher score than one only able to support lower performance.

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

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<sup>11</sup> As detailed in the full scoring rubric in section 13.1, a score differential of 100 points could be achieved for example if FTTH Application A requested only 10% of reference funding and committed to deploy in 8 months instead of 48 months, and overlapping Application B requested the full amount of reference funding and a deployment period of 48 months, with otherwise identically scored applications.

<sup>12</sup> In the event of a tie between two applications, the state will first re-review awarded scores to assess whether any adjustments are appropriate, and then the tied applications shall be ranked in order of the number of eligible locations included in the application from most to least.

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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 were selected and de-conflicted vis-à-vis each other using the same procedure described in IPv2 Section 2.4.6.

Additionally, in order to entice providers of reliable broadband service to areas proposed to be served by alternative technology, ConnectLA released and published to its website Supplemental Notice – Version 4.0<sup>13</sup> (SNv4) on October 4, 2024, following completion of selection activities for Round 2, which provided the following:

1. Summary of bidding round results to-date;
2. Information on the process and timing of the GUMBO 2.0 “direct negotiation” process; and,
3. Information on the process and timing of the GUMBO 2.0 Alternative Technology subgrant selection process.

SNv4 explained that any interested parties who were not pre-qualified, including but not limited to Alternative Technology providers (as defined by NTIA’s proposed BEAD Alternative Broadband Technology Policy Notice<sup>14</sup>) should contact ConnectLA to obtain access to the portal no later than noon, Thursday, October 10, 2024. ConnectLA notified all known reliable broadband service providers via email.

Data elements are provided via the Locations CSV file, Exhibit C.

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<sup>13</sup> <https://connect.la.gov/media/ktabtr33/supplemental-notice-v4-0-10-4-24-final.pdf>

<sup>14</sup> <https://www.ntia.gov/sites/default/files/publications/bead-alternative-broadband-technology-policy-notice-for-public-comment-final.pdf>

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## 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 and workforce development

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

#### Summary of Primary and Secondary Scoring Criterion (per IPv2 Section 2.4.2.1)

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

- a. Each application in each of Round 1 and Round 2 was 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.  $\text{Score} = 100 - [\text{percent of reference funding requested} - 100, \text{rounded to the nearest whole integer value}]$ .
  - 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>15</sup> This statutory Louisiana requirement shall be implemented as a subgrant condition, for a duration of time as required by final NTIA guidance,<sup>16</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

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<sup>15</sup> Louisiana Revised Statutes 51 §2370.29

<sup>16</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 in IPv2 Section 2.12.1.D.

total price to the customer for 1 Gbps/1 Gbps service in the project area,”<sup>17</sup> a base score of 200 points in this category will be awarded as follows:

- 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>18</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:

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<sup>17</sup> BEAD NOFO IV.B.2.i (discussion of mandatory Primary Criteria for Priority Projects, NOFO page 43).

<sup>18</sup> BEAD NOFO IV.B.2.ii (discussion of mandatory Primary Criteria for Non-Priority Projects, NOFO page 45).

- 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 data for the state of Louisiana. For example, for performance of a subgrant in 2026, the state would use Louisiana's 2025 FCC Urban Rate Survey results.
  - ii. On the first business day of the year, the state will determine that year's median price for 1Gbps/1Gbps service and for 100 Mbps/20 Mbps service that will be applicable to the GUMBO 2.0 program for the coming year.
  - iii. If a given year's survey results do not contain any service tiers precisely at 1Gbps/1Gbps or 100 Mbps/20 Mbps, the closest comparable service tier result will be used.
- e. Other provisions.
  - i. The applicable affordability commitments under this section shall be updated annually beginning upon final issuance of the subgrant.
  - ii. If at any point during the performance of a subgrant a subgrantee becomes subject to Louisiana's statutory affordability requirement by virtue of having delivered broadband service to at least 1000 consumers for a period of five consecutive years, the required subgrant affordability commitment shall be based on sections b.i or c.i above, as applicable.
- f. Maximum awardable points: 200

### 3. Primary Criteria – Fair Labor Practices

- a. Record of compliance with Federal labor and employment law. Any applicant that certifies a record of past compliance with Federal labor and employment law with respect to broadband deployment projects, as supported by submitted information as specified in IPv2 Section 2.7.1.A shall receive points as follows:
  - i. Applicants able to certify a record of compliance for at least three years will receive 80 points.
  - ii. Applicants also able to certify a record of compliance for four years will receive 5 additional points.
  - iii. Applicants also able to certify a record of compliance for five or more years will receive 6 additional points.
  - iv. Applicants that cannot certify compliance with Federal labor and employment law with respect to broadband deployment projects within the last three years, including new entrants that have not completed a broadband deployment project in that time frame, shall be eligible for points as provided in section 3.b. below
- b. Plan for ensuring compliance with Federal labor and employment law. Applicants shall receive points as follows:
  - i. Any applicant that provides a plan that meets the baseline compliance plan requirements as specified in IPv2 Section 2.7.1.B shall receive 10 points.
  - ii. Applicants may also achieve additional points, subject to the total category maximum of 101 points, based on including in their compliance plans additional elements as specified in IPv2 Section 2.7.1.B:
    - 1. One additional element only: 40 additional points
    - 2. Two additional elements: 70 additional points

3. Three or more additional elements: 90 additional points

- 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>19</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

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<sup>19</sup> NOFO IV.B.7.b.i and IV.B.7.b.ii

- infrastructure hardening step of including at least 90% buried fiber plant – including 100% buried plant to eligible CAls, unless a specific exception is granted -- as specified in IPv2 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 IPv2 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 IPv2 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 IPv2 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.



## Summary of Commitments Received from Subgrantees

*Specifically related to:*

- *Workforce Development and Compliance with Federal labor and compliance laws*
  - *All subgrantees, with the exception of one, submitted a Fair Labor Practice plan consistent with IPv2 Section 2.7 (inclusive of both workforce development and compliance with federal labor and compliance laws), thus receiving the maximum points available.*
- *Affordability*
  - *All subgrantees committed to comply with pricing regulations as outlined in IPv2 Section 2.4.2.1, thus receiving the maximum points available.*

The application portal focused on collecting information for scoring purposes and much of the scores for components listed above are based on yes/no questions. Accordingly, all applications were scored using the scoring rubric outlined in IPv2 Section 2.4.2.1.

Commitment(s)	Max Points Available	Explanation	Subgrantees Receiving Maximum Points
Affordability	200	Based on the applicant's commitment to support affordability in BEAD areas consistent with other areas of the state	22
Fair Labor Practices	101	Based on compliance record and workforce development	21

### ***Breakdown of Fair Labor Practice Plan Commitments by Subgrantees (IPv2 Section 2.7)***

Commitments	Included in Subgrantees' Plan(s)
Using a directly employed workforce, as opposed to a subcontracted workforce	8
Paying prevailing wages and benefits to workers	17
Use of local hire provisions	20
Commitments to union neutrality	16
Use of labor peace agreements	10
Use of an appropriately skilled workforce	22
Use of an appropriately credentialed workforce	22
Taking steps to prevent the misclassification of workers	21

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

### 14.1 Environmental and Historic Preservation (EHP) Documentation

Submit a document which includes the following:

- Description of 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.
- 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.

See Exhibit J.

## 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 K:

1. Jena Band of Choctaw Indians
2. Tunica-Biloxi Tribe of Louisiana
3. The Chitimacha Tribe of Louisiana
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.**

Not applicable.

## 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.'

N/A.

### 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.

N/A.

### 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:

- a. The public comment period was no less than 14 days; and
- b. Outreach and engagement activities were conducted to promote feedback during the public comment period

#### Public Comment Period

As required by NTIA, the public comment period for Louisiana's Final Proposal lasted no less than 14 days. The public comment period commenced on November 18, 2024, lasting through December 10, 2024.

#### Summary of Comments Received & Incorporation of Feedback into Final Proposal

Public comments included the following:

- Concerns about project feasibility.
- Suggestions to prioritize entities with existing infrastructure.
- Need for workforce development.
- Emphasis on using funding to enhance broadband speeds and ensure future-ready services in both rural and urban areas.
- Expressed support for the Draft Final Proposal but raised concerns about the allocation of funds for additional infrastructure data collection, recommending safeguards for proprietary information and clarification on data usage. Also highlighted the need for better communication on excavation notifications and stronger data security measures.
- Louisiana 211 offered to support efforts to connect unserved and underserved communities by creating a digital directory and tracking system for outreach.

ConnectLA takes all comments seriously and is committed to ensuring compliance with federal guidelines through ongoing monitoring as the BEAD program progresses. After receiving feedback, ConnectLA

thoroughly analyzed the comments and concluded that no significant changes to the Final Proposal were necessary. However, ConnectLA will keep these comments in mind as the program continues to evolve.

## Outreach and Engagement

To ensure broad participation in the public comment period for the Final Proposal, ConnectLA implemented a comprehensive strategy with a variety of tactics ranging from stakeholder engagement, digital presence, and media outreach. ConnectLA published the Final Proposal on our website with a streamlined public comment process. Upon publication, ConnectLA coordinated with the Office of the Governor of Louisiana to distribute a statewide press release detailing the comment submission process which was distributed to all media outlets, legislators, and state officials to ensure maximum engagement and awareness. ConnectLA also sent an email blast to a master list of 1,800+ stakeholders that included educational, healthcare, agricultural, public safety, and workforce and tribal entities with an overview of the Final Proposal and instructions for submitting comments, while also sharing the information across its social media platforms.

Recognizing the crucial role local leaders play in disseminating information about broadband investments across the state and encouraging participation in the public comment process, ConnectLA developed and distributed a local leader toolkit with email and social media templates for sharing information about the Final Proposal public comment period and directing stakeholders to the link to submit comments. ConnectLA also distributed a newsletter announcement through the Louisiana Municipal Association, an organization representing all 303 municipalities in Louisiana, and the Police Jury Association newsletter, which is distributed to the parish presidents across the state.


To further spread information about the Final Proposal public comment period, ConnectLA engaged media outlets across the state. The list below highlights some of the media mentions and articles covering ConnectLA's Final Proposal public comment period:

- **Broadband IO:** <https://www.broadband.io/c/state-director-profiles/meet-veneeth-la>
- **BRPROUD:** <https://www.brproud.com/news/louisiana-news/1-355-billion-to-expand-broadband-access-for-louisiana-homes-businesses-schools/>
- **Broadband Breakfast:** <https://broadbandbreakfast.com/louisiana-first-state-to-release-its-final-plans-for-bead/>
- **Nola Newswire:** <https://nolanewswire.com/online/louisiana-leads-nation-in-broadband-deployment-landry-announces-historic-1-355-billion-in-broadband-awards-to-eliminate-the-states-digital-divide/>
- **Cablefax:** <https://www.cablefax.com/distribution/louisiana-first-to-announce-bead-subgrantees>
- **Bossier Press-Tribune:** <https://bossierpress.com/louisiana-leads-nation-in-broadband-deployment-landry-announces-historic-1-355-billion-in-broadband-awards-to-eliminate-the-states-digital-divide/>
- **LightReading:** <https://www.lightreading.com/broadband/louisiana-to-award-95-of-bead-funds-for-fiber>

As the comment period neared its close, ConnectLA distributed reminder emails and posted on social media platforms to ensure maximum participation from all stakeholders.

The following posts were made to ConnectLA's social media platforms:

- [Facebook](#)
- [LinkedIn](#)




**ConnectLA**  
Published by Mallory Donahue  
4 hours ago · 🌐

...

The public comment period for ConnectLA's Final Proposal closes this Tuesday, December 10.

ConnectLA's Final Proposal to the National Telecommunications and Information Administration (NTIA) details our plans to allocate \$1.355 billion in BEAD funding through our GUMBO 2.0 program. This funding will expand broadband access to all 64 parishes in Louisiana.

To learn more about how to submit a public comment and to view the Final Proposal, visit:



**ConnectLA**  
730 followers  
4h • 🌐

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To learn more about how to submit a public comment and to view the Final Proposal, visit [connect.la.gov/bead](https://connect.la.gov/bead)

**Broadband Equity Access and Deployment (BEAD)**  
[connect.la.gov](https://connect.la.gov)

CONNECT.LA.GOV

**BEAD - Connect Louisiana**  
The Connect Louisiana team is THE broadband resource in Louisian...



## 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 – No BEAD Locations csv

[NO BEAD Locations csv](#)

### Exhibit E – CAIs csv

[CAIs csv](#)

### Exhibit F – Non-Deployment Projects csv

[Non-Deployment Projects csv](#)

### Exhibit G – BEAD Program Monitoring Plan

[BEAD Program Monitoring Plan](#)

### Exhibit H – Subgrant Agreement

[Draft Subrecipient Agreement](#)

### Exhibit I – Local Coordination Tracker

[Local Coordination Tracker](#)

### Exhibit J – Environmental and Historic Preservation (EHP) Documentation

[Environmental and Historic Preservation \(EHP\)](#)

### Exhibit K – Documentation of Consent from Tribal Entities

[Consent from Tribal Entities](#)

1. Jena Band of Choctaw Indians
2. Tunica-Biloxi Tribe of Louisiana
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.