

Title **0027** 08/30/2023

by **Nathan Madden** in **BEAD Initial Plan, Volume 1 Public Comment Form** id. 43893270

2300 Main Street
Suite 304
Kansas City, Missouri
64108
United States
(816) 241-7006
nmadden@healthforward.org

Original Submission 08/30/2023

Please provide name **Nathan Madden**

Please provide address (Not required) **2300 Main Street
Suite 304
Kansas City
Missouri
64108
US**

Please provide email **nmadden@healthforward.org**

Please provide phone number (not required) **+17122601877**

Are you responding on behalf of an organization? **Yes**

Organizational affiliation (If applicable) **Health Forward Foundation**

The Kansas Office of Broadband Development (KOBD) is in the process of developing its BEAD Initial Proposal as required by the NTIA. This initial plan is divided into Volume 1 and Volume 2. Volume 1 includes initial identification of unserved and underserved locations, definition of community anchor institutions, proposed pre-challenge process location modifications, and the model challenge process. Please use this link to review the entire Initial Proposal Volume 1 document, and feedback on Volume 1 will be captured in the text boxes below. The comment portal will be open from August 1, 2023 through August 30, 2023. KOBD will then review all feedback and submit the Initial Proposal to the NTIA. To access a full copy of Volume 1 of the BEAD Initial Proposal along with accompanying documents, please use the links below:
<https://www.kansascommerce.gov/officeofbroadbanddevelopment/broadband-equity-access-and-deployment/>

I am responding to comments related to the following Volume 1 requirements

Requirement 3: Identification of existing broadband efforts
Requirement 6: Identification and application of Community Anchor Institutions (CAI)

Comments relating to Requirement 3: Identification of existing broadband efforts

Health Forward Foundation's respectfully submits these recommendations and comments to the Kansas Office of Broadband Development as input for the Broadband Equity Access and Deployment Initial Proposal Volume 1. Health Forward is a regional public health foundation working every day in Kansas and Missouri to support and build inclusive, powerful, and healthy communities characterized by racial equity and economically just systems. Healthy, powerful and inclusive communities require that all people have the access and knowledge required to use digital tools to participate and thrive in the 21st Century digital economy.

Our comments reflect several key areas: providing the infrastructure and support communities need to thrive; gathering continuous feedback from these communities; expanding telehealth opportunities; and funding technical assistance for organizations applying for federal broadband-related grants.

Kansas should pursue digital equity with vigor through the deployment of Broadband Equity Access and Deployment (BEAD) dollars. Investments in broadband infrastructure, access, and know-how are key to stronger economic and health outcomes. According to the National Digital Inclusion Alliance, nearly 68,000 jobs require foundational digital skills and over 22,000 people who are unemployed do not have those skills. (https://state-scorecard.digitalinclusion.org/scorecard/by_state/KS)

Infrastructure and support to under- and unserved communities.

Kansas has a significant need to build and upgrade high-speed internet infrastructure. About 1 million Kansans (<https://news.ku.edu/2022/03/23/speed-test-surveys-show-1-million-kansans-may-have-inadequate-internet>) lack adequate internet connectivity. Furthermore, Kansans of color lack adequate internet access at higher rates than their white counterparts (<https://www.khi.org/articles/variations-in-internet-access-across-kansas/>), and rural schools have a much lower rate of connectivity to high-speed internet than schools in urban or suburban areas (<https://ies.ed.gov/ncee/edlabs/projects/covid-19/documents/pdf/KS-internet-connectivity-508.pdf>).

With such a large gap in internet connectivity throughout the state, investment in infrastructure is key. The BEAD program allocation can be used to catalyze the Capital Projects Fund investments to help build middle and last mile infrastructure to under- and unserved communities. The \$75 million remaining from the Broadband Acceleration Grant could also be used in this way. We recommend these dollars be focused primarily on these areas.

Gathering continuous feedback from under- and unserved communities.

We applaud the Kansas Office of Broadband Development (KOBBD) for its efforts to gain insights and understanding about residents' needs. Given the significant opportunities for investment, we encourage a continuous process of engagement with, and in, communities to ensure their buy-in and adjust as BEAD and other dollars get to work.

The University of Kansas has a robust Community Toolbox on gathering community feedback (<https://ctb.ku.edu/en/table-of-contents/maintain/maintain-quality-performance/feedback-from-clients/main>). We also highly recommend that the people leading engagement and community interaction be from the communities for which input is sought.

Last, we also recommend that significant dollars from the BEAD Initial Planning grant, DEA Planning grant, and Affordable Connectivity Program Outreach Program go directly to community-based organizations (CBOs) to help with this work.

Expanding telehealth opportunities to affected communities.

The availability of federal dollars for broadband provides a significant opportunity to expand telehealth programs to Kansans. Telehealth, especially since the COVID-19 pandemic, is in high demand throughout the county and is used at a rate 38 times the pre-COVID baseline (<https://www.mckinsey.com/industries/healthcare/our-insights/telehealth-a-quarter-trillion-dollar-post-covid-19-reality>). Telehealth also promotes better health outcomes for people living with chronic diseases, especially in areas where health services are more difficult to access (<https://www.sciencedirect.com/science/article/abs/pii/S0738399118300533>).

The Rural Health Care program grant dollars should focus on expanding telehealth, as well as Distance Learning and Telemedicine Grants, depending on award status and amount. Additionally, the Tribal Broadband Connectivity Program should receive additional technical support from the Kansas Office of Broadband Development (KOBD) to ensure tribal nations achieve their goals in broadband access and connectivity.

Providing technical assistance to organizations applying for federal broadband-related grants.

Despite their targeted nature to communities most affected by a lack of adequate internet speed, some grant opportunities did not have any applications. The Community Connect and Connecting Minority Communities grant programs have no outstanding applications from communities or organizations in Kansas. In conjunction with our first two recommendations and using our list of Community Based Organizations and Community Anchor Institutions, we strongly encourage KOBD to engage with communities to provide technical assistance to apply for these federal funds. It's very likely that there is interest in applying but given the difficulty of federal grant applications, technical assistance may be needed to help take advantage of these opportunities.

We welcome the opportunity to connect with you further. Additionally, please refer to the list of CBOs/CAIs who would be excellent partners and conduits for community engagement and program delivery. We look forward to continued partnership on broadband development and deployment to ensure a more economically vibrant, healthy, and equitable Kansas for all.

Comments relating to Requirement 6: Identification and application of Community Anchor Institutions (CAI)

Health Forward has a wide range of relationships with community-based organizations in our Kansas service area and beyond. As we were looking at your current CAI list, we noticed that there were few of these organizations in your existing database. Oftentimes, these organizations are run by and serve people who are most familiar with little-to-no broadband access. We would encourage the KOBD to establish and build trusting relationships with these people and institutions who are essential in helping close digital equity gaps.

Pertaining to our comments above, these organizations may be best for helping deliver training or programming related to digital inclusion, convening communities to seek solutions, and - with some technical assistance and support - for completing applications for federal grants to bring more resources back to Kansas. Please let us know if you would like any introduction to the individuals who steward these incredible organizations.

CAI List Upload (if applicable)

[HFFCAI-EligibleEntityListBEAD.xlsx](#)

By submitting the Public Comment Form (the "Form") and any supporting evidence, you attest that all information furnished is true and accurate to the best of your knowledge and that any attachments are free of malware or viruses. You also acknowledge that falsifying any information could result in legal action against you and will bar you from submitting public comments to this web site in the future. You authorize the Kansas Office of Broadband Development, Kansas Department of Commerce (KOBD) to contact you if further information is needed. You expressly acknowledge and consent to some personal information, including your name, address, phone, e-mail, organization you represent, and comments, being posted for public view

Nathan J. Madden

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