
Title	0013	11/02/2023
	by Robert Gibson in Digital Equity Public Comment (English)	id. 44597558
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Original Submission 11/02/2023

Please provide your first and last name	Robert Gibson
Please provide email address	rgibson@healthforward.org
Please provide a telephone number if applicable	+18162417006
If you are affiliated with an organization, please provide the organization name	Health Forward Foundation
If you are affiliated with an organization, please share a brief paragraph about your organization and its work in promoting digital equity	<p>Health Forward Foundation (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.</p> <p>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 modern digital economy. The ability and skills needed to use technology opens doors to telehealth, access to housing and job opportunities. Ensuring equitable access to digital tools is a strategic priority for Health Forward's grantmaking and advocacy work.</p>
If affiliated with an organization, please provide a link to website	https://healthforward.org/

Who is your main point of contact if we have further questions? Please provide their name and the best method to communicate with them if they are not the commentor on this form

McClain Bryant Macklin, Health Forward Foundation- Vice President of Policy and Impact; email: mbryantmacklin@healthforward.org

Is there any additional background information you would like our office to know?

This year alone, we awarded nine nonprofit organizations a total of \$150,300 in support of their work to advance digital inclusion. Access to our economy and to health now requires access to affordable digital tools and the skills to maximize them. In many ZIP codes, including our rural and urban areas, this access is limited by income and infrastructure.

Subsequently, we support the Kansas Office of Broadband Development in its efforts to advance digital equity in Kansas through strategies outlined in the Kansas Digital Equity Plan that focus on inclusion, affordability, availability, training, and collaboration. The following comments reflect our support of these strategies, specifically in the following areas:

- Section 3.1.2 & 3.1.5: Existing Digital Equity Plans and Broadband Affordability Assets
- Section 4.1: Collaboration and Stakeholder Engagement- Utilizing community-based organizations (CBO's) for outreach.
- Section 5.1: Implementation- Expanding telehealth opportunities to affected communities.

Please rank the Kansas digital equity plan on how it accomplishes the following:

Question 1: Outlines the current state of digital equity in Kansas

Well

Question 2: Outlines a vision for digital equity in Kansas that recognizes the state's unique social and economic circumstances

Well

Question 3: Identifies the barriers to digital equity faced by each of the state's covered populations

Very well

Question 4: Establishes an implementation strategy to achieve digital equity	Well																																																
Question 5: Describes how Kansas will coordinate and conduct outreach amongst digital equity partners and stakeholders	Average																																																
Question 6: Describes how Kansas will coordinate its use of DEA funding with any funds it will receive in connection with BEAD or other digital equity funding	Well																																																
Question 7: Identifies the assets available to help connect Kansas' covered populations	Average																																																
Question 8: If there are any digital equity assets that you feel have not been listed in the digital equity plan, please list them here	<ul style="list-style-type: none"> Community support organizations: The Eligible Entity included any organizations that facilitate greater use of broadband service by vulnerable populations, including low-income individuals, unemployed individuals, and aged individuals. The Eligible Entity included senior centers and job training centers in this category. The Department of Labor maintains a database of "American Job Training" training centers, established as part of the Workforce Investment Act, and reauthorized in the Workforce Innovation and Opportunities Act of 2014. The database can be accessed at the American Job Center Finder⁶. The National Council on Aging (NCOA) helped identify senior centers⁷. 																																																
	<table border="1"> <thead> <tr> <th>Community Support Organization Type</th> <th>Address 1</th> <th>Address 2</th> <th>City</th> <th>State</th> <th>Zip</th> <th>Zip+4</th> <th>County</th> <th>Explanation: Provide a brief explanation of how the institution facilitates greater broadband use and the population it serves</th> <th>Broadband Availability - The highest available broadband service speed of the CAIs (Mbps)</th> <th>The Broadband need of the location, denoted in Mbps download speeds (ie 50 Mbps; 1000 Mbps; etc)</th> <th>Comments</th> </tr> </thead> <tbody> <tr> <td>Catholic Charities of NE Kansas</td> <td>600 Minnesota Ave.</td> <td></td> <td>Kansas City</td> <td>KS</td> <td>66101</td> <td></td> <td>Wyandotte County</td> <td>Provides grants and emergency funding to families who struggle to pay for internet/broadband services</td> <td></td> <td></td> <td></td> </tr> <tr> <td>Eckan - East Cenral KS Eco Opportunity Corp.</td> <td>1320 S. Ash St.</td> <td></td> <td>Ottawa</td> <td>KS</td> <td>66067</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>El Centro</td> <td>650 Minnesota Ave.</td> <td></td> <td>Kansas City</td> <td>KS</td> <td>66101</td> <td></td> <td>Wyandotte County</td> <td>Provides grants and emergency funding to families who struggle to pay for</td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Community Support Organization Type	Address 1	Address 2	City	State	Zip	Zip+4	County	Explanation: Provide a brief explanation of how the institution facilitates greater broadband use and the population it serves	Broadband Availability - The highest available broadband service speed of the CAIs (Mbps)	The Broadband need of the location, denoted in Mbps download speeds (ie 50 Mbps; 1000 Mbps; etc)	Comments	Catholic Charities of NE Kansas	600 Minnesota Ave.		Kansas City	KS	66101		Wyandotte County	Provides grants and emergency funding to families who struggle to pay for internet/broadband services				Eckan - East Cenral KS Eco Opportunity Corp.	1320 S. Ash St.		Ottawa	KS	66067							El Centro	650 Minnesota Ave.		Kansas City	KS	66101		Wyandotte County	Provides grants and emergency funding to families who struggle to pay for			
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internet/broadband services
 Groundwork NE 803 Armstrong Kansas City KS 66101 Wyandotte County
 Provides grants and emergency funding to families who struggle to pay for
 internet/broadband services
 JCCC - Adult Education JCCC, 12345 College Blvd. Overland Park KS 66210
 Kansas City, KS Public Library 625 Minnesota Ave. Kansas City KS 66109
 Wyandotte County Provides access to computers and other digital resouces
 for residents
 My Father's House Community Services 1004 N. Pearl St. Paola KS 66071
 Osawatomie Public Library 527 Brown Ave. Osawatomie KS 66064
 The Toolbox 1303 Central Ave. #4 Kansas City KS 66102
 Crosslines 736 Shawnee Ave Kansas City KS 66105 Wyandotte County
 Providing tablets, computers and other digital devices homeless and
 unhoused residents in KCK
 Village Initiative 3004 N 27th St Kansas City KS 66104 Wyandotte County
 Re-Entry programs that provide life skills and job trainig in careers such as
 technology and computer science.
 Iola Library 218 E Madison Ave Iola KS 66749
 Savonburg Library 101 S Walnut St Savonburg KS 66772
 Humboldt Library 916 Bridge St Humboldt KS 66748
 Moran Library 308 N Spruce St Moran KS 66755
 Thrive Allen County 9 S Jefferson Ave Iola KS 66749
 Hope Unlimited 406 N Buckeye St. Iola KS 66749
 Southeast Kansas Mental Health Center 519 S Elm St Garnett KS 66032
 Community Health Center of Southeast Kansas 3011 N Michigan St Pittsburg
 KS 66762
 Allen Regional Hospital 3066 N Kentucky St Iola KS 66749
 Humanity House 110 East Street Iola KS 66749
 Mildred Store 86 3rd St Moran KS 66755
 Allen Community College 1801 N. Cottonwood Iola KS 66749
 A Bolder Humboldt 112 NORTH 9th ST Humboldt KS 66748
 Iola Chamber of Commerce 10 W Jackson St Iola KS 66749
 Humboldt Chamber of Commerce 725 Bridge St Humboldt KS 66748
 New Wave Broadband Company 109 W 6th St La Harpe KS 66751
 KwikKom 800 W Miller Rd Iola KS 66749
 Southeast Kansas Community Action Program 401 N Sinnet St. Girard KS
 66743
 Iola Industries 16 W Jackson Ave Iola KS 66749
 Tri-Valley Development Services 521 W. 35 Chanute Pkwy Chanute KS
 66720
 Kansas Children Service League 1365 N Custer Wichitat KS 62703
 Kansas State Extension Office 123 Umberger Hall Manhattan KS 66506
 Kansas Parents as Teachers 22795 W 255th St. Paola KS 66071

Question 9: Please
 indicate which
 sections of the
 Kansas digital equity
 plan you are
 providing comment on

Section 5: Implementation
 Section 4: Collaboration and Stakeholder Engagement
 Section 3: Current State of Digital Equity: Barriers and Assets
 Other section not listed or general comments

Please provide comment on Section 3: Current State of Digital Equity: Barriers and Assets

1. Section 3.1.2 & 3.1.5: Existing Digital Equity Plans and Broadband Affordability Assets.

There is a significant need for Kansans to have increased access to high-speed internet and broadband services. About 1 million Kansans lack adequate internet connectivity (<https://news.ku.edu/2022/03/23/speed-test-surveys-show-1-million-kansans-may-have-inadequate-internet>). Furthermore, Kansans of color lack adequate internet access at higher rates (<https://www.khi.org/articles/variations-in-internet-access-across-kansas/>) than their white counterparts.

Consequently, while programs such as the Affordable Connectivity Program already exist to help residents gain access to broadband services through independent service providers, the cost associated with these programs still excludes many families. 1 Gbps/1Gbps monthly package plans generally range from \$90 to \$120. Additionally, monthly service costs for 100 mbps/200mbps start at \$60 dollars and can cost up to \$90 in some areas. Even the \$60 plan is not affordable for many older adults and families that live in rural areas. Any considerations that can make these programs more affordable by decreasing costs below \$90 and \$60, respectively, would increase the likelihood that more families can utilize these services.

Please provide comment on Section 4: Collaboration and Stakeholder Engagement

2. Section 4.1: Collaboration and Stakeholder Engagement- Utilizing community-based organizations (CBO's) for outreach.

We applaud the Kansas Office of Broadband Development for its efforts to gain insights and understanding about residents' needs, especially within historically excluded communities. 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 toolbox for gathering community feedback (<https://ctb.ku.edu/en/table-of-contents/maintain/maintain-quality-performance/feedback-from-clients/main>). Also, we highly recommend that the people leading engagement and community interaction be from the communities for which input is sought.

Lastly, we also recommend that significant dollars from the Broadband, Equity, Access, and Deployment (BEAD) Initial Planning grant, DEA Planning grant, Affordable Connectivity Program Outreach Program, and other funding sources mentioned in the DE plan go directly to community-based organizations (CBOs) to help with this work.

Please provide comment on Section 5: Implementation

3. Section 5.1: Implementation- 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 to ensure tribal nations achieve their goals in broadband access and connectivity.

Please provide comment on any other section not listed, or provide general comments on the digital equity plan

We welcome the opportunity to connect with you further. Members of our staff have decades of experience in digital equity as the former Regional HUD Administrator and co-author of the Kansas City, Missouri, 2017 Digital Equity Strategic Plan. We welcome the opportunity to be in thought partnership with your office and leverage resources toward our shared goals. Additionally, please refer to the list of community-based organizations and community anchor institutions (CBOs/CAIs) we have submitted; these organizations 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.

By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result in legal action. Please type your name and today's date in the text box below.

Robert Gibson