<div align="center">

SUMMARY OF PUBLIC COMMENTS

FR-6338-N-01 Notice of Expansion and Restructuring of the Digital Opportunity Demonstration Program

</div>

I.   Background

On October 17, 2023, HUD published a notice in the Federal Register entitled "Notice of Expansion and Restructuring of the Digital Opportunity Demonstration Program[1]" (the Notice). The Notice asked reviewers to comment on HUD's proposed restructuring of its Digital Demonstration Program, ConnectHomeUSA, to a tiered model. The Notice also announced that an opportunity to join the initiative would be opening after the comment period ended by sending a Letter of Intent to HUD meeting specific requirements outlined in the Notice.

II.   About this Summary

This document summarizes the substantive comments[2] received during the open comment period[3] and HUD's responses. HUD received comments from four commenters, a refurbisher, a multifamily housing membership organization representing federally subsidized senior housing properties, a federal agency, and a housing authority.

III.   Summarized Public Comments

a. Three-Tiered Model Approach:

HUD proposed a new three-tiered approach for participation, with Tier 1 reserved for communities that are new to the work of digital inclusion, Tier 2 reserved for existing ConnectHomeUSA (CHUSA) communities, and Tier 3 for communities achieving specific milestones at a later date. One commenter responded that the tiered approach would provide incentives and contribute to the overall success of the program. Another commenter expressed concern that HUD should provide a "tangible benefit" that would incentivize more communities to apply as Tier 1 communities since PHAs generally lack resources. This commenter also suggested providing introductory training for Tier 1 communities.

HUD Response: HUD agrees that the tiered approach, with built-in milestones and corresponding digital badges will provide incentives and lead to overall success. HUD understands that PHAs have limited resources, for this reason, HUD has purposely designed Tier 1 to be a lighter engagement to allow communities to ease into the work of digital inclusion while giving them the option to advance to Tier 2 after demonstrating achievement of specific milestones. HUD will be releasing a self-paced training program for new communities and is considering developing an orientation session to welcome Tier 1 and Tier 2 communities into the program.

b. Baseline Survey and Data Reporting Requirements:

---

[1] The Notice is available here: https://www.federalregister.gov/documents/2023/10/17/2023-22800/notice-of-expansion-and-proposed-restructuring-of-the-digital-opportunity-demonstration-program.
[2] Public comments can be viewed here: Regulations.gov/document/HUD-2023-0084-0001
[3] The comment period was open from October 17, 2023-December 18, 2023.

A commenter suggested establishing minimum survey participation levels as a way to help communities develop more refined or accurate goals. Another commenter expressed concern that quarterly reporting could be burdensome for communities and suggested bi-annual reporting instead. The same commenter expressed concern about HUD sharing the data from reporting with the general public.

HUD Response: HUD agrees with the recommendation regarding the baseline survey and will provide more guidance and training around the administering of baseline surveys once communities are selected. HUD is very sensitive to creating unnecessary burdens on CHUSA communities and has developed a simple online reporting tool that should not require a large amount of time. In fact, reporting on a quarterly basis will allow communities to track their progress more regularly against goals they will have developed and submitted to HUD. HUD will not publish or otherwise make public an individual community's progress or lack thereof. HUD may decide to publish aggregate data across sites to demonstrate the effectiveness of the CHUSA model, but no individual site's data would be identifiable.

c. **Required Levels of Engagement:**

1. Staffing: Two commenters expressed concern regarding the requirement to commit a dedicated staff person to this work, given the lack of funding for CHUSA and housing organizations' limited staffing resources. Another commenter supported this requirement. One commenter additionally encouraged HUD to secure funding for CHUSA that could be used for a dedicated staff person.

   HUD Response: HUD prefers to avoid imposing additional burdens on its housing partners whenever possible, however, this requirement is based on observed experience. CHUSA sites that had a staff person managing the various partners, goals and other aspects of the work were the ones that were most likely to succeed. The dedicated staff person does not have to work on CHUSA full-time, for example they can be a full or part-time staff person in the Resident Services Department of the organization who dedicates a portion of their time to CHUSA. To support technical assistance and peer development, it is vital that a dedicated staff member be identified to support an organization's commitment to this work. CHUSA provides numerous nonfinancial benefits to CHUSA communities such as access to CHUSA stakeholders, including device refurbishers and Internet Service Providers (ISPs), and technical assistance. Having these resources already in place means the CHUSA staff person does not have to identify organizations that can provide needed equipment or service, thereby easing the work of CHUSA staff.

2. Community engagement: One commenter recommended establishing specific expectations for community engagement, such as a minimum number of monthly regional calls and/or community of practice forums to ensure a consistent and meaningful exchange of ideas and best practices among communities.

   HUD Response: HUD agrees with the recommendation and plans to hold regional calls with communities every month. These monthly touchpoints serve as a community of practice

across the HUD regions, and are important for the reasons the commenter specifies, but also, to maintain momentum, in the face of competing opportunities.

3. <u>Three-year commitment</u>: One commenter supported the requirement that communities commit to a three-year engagement based on their own experience. The commenter suggested that HUD consider implementing specific milestones that communities should meet at specific annual intervals to help participating communities "make sense of and plan for the three-year commitment, including developing a plan, engaging stakeholders and residents, and testing pilots of digital inclusion programs."

    <u>HUD Response</u>: HUD agrees with this suggestion. In fact, in the preliminary design, HUD did specify timeframes to conclude certain activities. For example, for Tier 2 communities, HUD is asking communities to complete a baseline survey at the six-month mark. There are also annual badges for convenings held. However, as a broader approach, HUD agrees that perhaps other interim milestones should be clearly delineated for participating communities based on the Tier of participation.

d. The Digital Inclusion Stool

    The digital inclusion stool refers to providing low-income Americans with affordable access to Internet service, devices, and the training to use them. HUD received several comments on this topic.

1. <u>Addressing the Digital Inclusion Stool to Support Other Outcomes</u>: One commenter appreciated HUD's emphasis on building on this stool by asking communities to help residents achieve outcomes related to education, employment, and health "but not at the expense of first laying a strong digital equity foundation."

    <u>HUD Response</u>: HUD agrees. For this reason, HUD does not require Tier 1 or "beginner" communities to apply to join with a quality-of-life partner. Tier 2 is reserved for communities that have participated in CHUSA already and therefore, have an already-established digital equity foundation. In fact, our goal is for Tier 2 communities to build upon that foundation to create opportunities for their residents in education, employment, health by partnering with a partner of their choice that addresses one of these, or another area that is important to their community.

2. <u>Hands-On Digital Literacy Training</u>: A commenter suggested that remote digital literacy training can be as effective, if not more so, than in-person training.

    <u>HUD Response</u>: HUD appreciates the comment; however, HUD will not require CHUSA communities to offer one type over the other, but will rather suggest and encourage communities to provide training opportunities that work best for the populations they are serving.

e. Training Events, Webinars, and Conferences:

    One commenter sought clarification regarding whether there is a minimum number of events communities must attend in order to advance to a higher tier. Their letter also states that

"Recognizing diverse capacities is essential for fostering inclusivity and success across all participating communities." Another commenter asked whether these learning opportunities could be opened to non-CHUSA communities.

HUD Response: At this time, there is no minimum number of HUD-sponsored events that are required to advance to the next tier. However, HUD agrees that requiring regular participation in monthly regional calls could be helpful. HUD may revisit this lack of minimum participation requirements. However, there *are* other milestones around connectivity, device distribution and resident training, that must be met in order to advance to the next tier.

HUD also agrees with this commenter's position that it is important to recognize communities' varying degrees of experience. It is primarily for this reason that HUD established the tiered system so that we could design technical assistance based on varying levels of experience.

With respect to the comment about opening training opportunities to non-CHUSA communities, all past CHUSA summits and webinars have been open to the wider public. We don't anticipate changing this approach, though we will likely create special sessions that are designed specifically for and open only to the new CHUSA communities. In the absence of funding, this is a type of value-add we can offer to communities that join CHUSA.

f. Digital Badges

One commenter suggested that in addition to using digital badges to recognize accomplishments, that HUD also consider "highlighting the digital equity work and accomplishments of PHAs on a central website." The website would have added benefits, such as being a central repository for case studies, success stories, profiles of residents and much more.

HUD Response: HUD is using digital badges to recognize accomplishments in a manner that aligns with the fact that CHUSA is a digital initiative. CHUSA communities will be able to post these badges to their own websites, issue press releases, use them to boost fundraising efforts, post them on LinkedIn, and for other uses they may find. HUD has two CHUSA websites, one for technical assistance products (such as CHUSA case studies) and the second is a more programmatic site. This latter site will be updated as this new phase of CHUSA gets underway. In past iterations of the website, we have showcased individual communities, residents, and their success. This is something we hope to continue in the months and years to come.

g. Selection Criteria:

Two commenters suggested that other HUD-assisted housing organizations that had not previously participated in CHUSA may have already undertaken enough digital equity work that could make them eligible for Tier 2 status. One of these commenters also expressed concern that the expansion was targeting smaller organizations that have not begun digital inclusion work.

HUD Response: HUD agrees that there are organizations outside the CHUSA universe that have already undertaken work that would be commensurate to the work of existing CHUSA communities. However, due to limited resources, HUD will continue to reserve Tier 2 for existing (or former) CHUSA communities while allowing Tier 1 communities to graduate to Tier 2 as quickly as they meet the milestones required to move to Tier 2. This will allow us to ensure

that all communities joining the CHUSA initiative have a common understanding of CHUSA's goals and framework. Also, HUD is attempting through the restructuring to assist communities, irrespective of size, that have little to no experience in the field of digital inclusion, understand the pieces that go into creating an effective digital inclusion initiative.

h. The Term "Community" Is Vague in the Multifamily Context

One commenter suggested that usage of the term "community" was unclear since the notice does not specifically define the term in the context of CHUSA, or specifically for Multifamily. The term was especially unclear, according to the commenter since Multifamily organizations can have multiple properties and therefore potential "communities."

HUD Response: The term "community" is being used to refer to a location, or site. For example, the Roxboro HA is a "CHUSA community." Which developments Roxboro or other PHA or MF owner/operator chooses to target for its CHUSA participation is up to the PHA or MF owner itself. In fact, we encourage new participants to start small – targeting one or two small developments so they can understand the process of surveying residents, identifying partners, holding a convening, and then doing the work of connecting and training the residents in the properties they are targeting for the CHUSA participation. If a CHUSA community decides to expand to other properties, they certainly can. The sites determine the extent of their involvement.

i. Broadband Guidance:

One commenter expressed gratitude to HUD for broadband-related guidance related to public housing. Specifically, the commenter cited this guidance as particularly helpful "[Use of Public Housing Funding to Support Internet Connectivity for Residents](#)". The commenter suggested that similar guidance for "Section 8 and other funding sources would be necessary in order for PHAs to have the confidence that all parts of HUD are fully supportive of digital equity work."

HUD Response: HUD agrees and will share this comment with other program offices within the Office of Public and Indian Housing.

j. Working with Department of Interior's Bureau of Indian Education

A comment received from the Department of Interior's Bureau of Indian Education (BIE) asked whether HUD would be amenable to working together to support the schools that are in need of broadband.

HUD Response: Yes, HUD would be interested in working together and/or supporting BIE's efforts in other ways using lessons learned from the implementation of CHUSA.