The below Frequently Asked Questions (FAQs) are for informational purposes only and are intended solely to assist potential applicants in better understanding the NTIA Connecting Minority Communities (CMC) Pilot Program and the application requirements set forth in the CMC [Final Rule](#) and [Notice of Funding Opportunity](#) (NOFO) for this program. The FAQs do not and are 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 the below FAQs.

Eligibility

Are consortiums eligible to apply?

Yes. Pursuant to Section III.A of the NOFO, NTIA encourages collaboration and partnerships through the submission of an application on behalf of a consortium. NTIA encourages eligible entities to collaborate or participate as part of a consortium for the Connecting Minority Communities Pilot Program. The consortium must be led by an eligible HBCU, TCU or MSI higher education institution.

Can multiple minority business enterprises (MBEs) and tax-exempt 501(c)(3) organizations participate in a consortium project and application?

Yes. Multiple MBEs and tax-exempt 501(c)(3) organizations may participate in a CMC consortium project. Additionally, MBEs and tax-exempt 501(c)(3) organizations may participate in more than one CMC application and project.

Can a consortium application contain multiple HBCU, TCU or MSI schools, i.e., may more than one HBCU, TCU or MSI collaborate on a project for a consortium application?

Yes. Multiple schools may collaborate with a lead HBCU, TCU or MSI to propose a project for CMC funding. However, the following requirements for <u>consortia applications</u> apply:

1) participating schools must conduct programmatic activities within the qualifying anchor communities of the lead applicant institution;
2) schools that are listed as ***<u>subrecipients</u>*** in a consortium application are prohibited from submitting their own lead application for CMC funding or participating as a Funded Project Participant in another application;

3) each consortium application must include a Letter of Commitment from an authorized representative of each member of the consortium; and
4) the consortium application must include a table of all Funded Project Participants and all Unfunded Informal Collaborators in the project. *See* NOFO Sections III and IV.B.6.b.

May an eligible HBCU, TCU or MSI institution submit only one single application for the CMC Pilot Program, or may an eligible HBCU, TCU or MSI submit other applications for the CMC Pilot Program as a member of a consortium?

An eligible HBCU, TCU or MSI may either: (1) serve as the lead on one application, or (2) participate as a ***subrecipient*** in consortium application, *but not both*. However, an eligible HBCU, TCU or MSI may serve as the lead on one application and an Unfunded Informal Collaborator with respect to one or more separate applications.

Finally, it is important to note that it is the responsibility of each lead applicant to understand the requirements of 2 CFR Part 200, including the requirements for the selection, identification and oversight of subrecipients and contractors. See 2 C.F.R. § 200.331 for the standards for making subrecipient and contractor determinations.

Do the members of the consortium application need to have a formal partnership agreement in place before applying to the CMC Pilot Program?

No. The consortium does not need to be documented in a formal legal agreement at the time of application submission, but should be expressed in the Letters of Commitment submitted with the application as an intent to implement the project proposed for an award. NTIA requires that Letters of Commitment from each of the funded participants and any other significant partners in the proposed project be submitted as a part of the application. Each Letter of Commitment should: (1) detail the role of each member in the proposed project; (2) detail each member's commitment to fulfilling the intent of the proposed project, and (3) be signed by an authorized representative of each member of the consortium. *See* Sections IV.B.6 and IV.B.9 of the NOFO.

What entities from the consortium are required to submit a Letter of Commitment, and to whom should the letter be addressed?

Each CMC consortia application must include a Letter of Commitment from an authorized representative of each member of the consortium project. The Letter of Commitment must clearly discuss the scope of work to be undertaken by the member and its relevance to the CMC project. The Letters of Commitment should be addressed

to the following individual, reference NTIA-CMCPP-2021, and be submitted with the rest of the application via Grants.gov:

Evelyn Remaley
Acting Assistant Secretary for Communications and Information
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, NW, Room 4898
Washington, DC 20230

If a formal agreement (beyond the Letter of Commitment) exists between the members of the consortia, should the agreement be submitted with the application instead of the Letter of Commitment?

No. Notwithstanding the existence of a formal partnership agreement, all members of the consortium must submit the required Letters of Commitment.

Is there an advantage for an educational institution to apply as a lead applicant of a consortium or to submit an independent application? Are projects that address anchor community needs favored over projects that address an eligible institution's (i.e., HBCU, TCU or MSI) needs?

No, NTIA will not favor a specific approach. NTIA will evaluate each application and proposed project individually on its own merits in accordance with the program requirements. See Section V of the NOFO for more information on the evaluation criteria, selection factors and selection process for the CMC Pilot Program.

Can a state or local government participate as program partner or subrecipient in a CMC application?

Yes a state or local government can participate as a program partner or subrecipient or member of a consortium application. See Section I of the NOFO for the full Program Description.

What are Minority-serving Institutions (MSIs)?

The U.S. Department of Education defines Minority Serving Institutions (MSIs) as colleges and universities that enroll significant percentages of undergraduate minority

students.[1] Historically Black college or university (HBCU) and Tribal college or university (TCU) designations are legislatively defined and the U.S. Department of Education categorizes the following types of MSIs:

- Alaska Native or Native Hawaiian-Serving Institutions (ANNH)
- Asian American and Native American Pacific Islander-Serving Institutions (AANAPISI)
- Hispanic-Serving Institutions (HSIs)
- Native American-Serving Non-Tribal Institutions (NASNTI)
- Predominantly Black Institutions (PBI)

The list of eligible HBCUs and TCUs can be found at the National Center for Education Statistics (NCES) website at: https://nces.ed.gov/collegenavigator/.

The U.S. Department of Education's Eligibility Matrix for all Minority Serving Institutions is also maintained by NCES and the current version is provided by the Department's Office of Postsecondary Education at: https://www2.ed.gov/about/offices/list/ope/idues/2021eligibilitymatrix.xlsx.

Applicants may also utilize the CMC Anchor Community Eligibility Dashboard at: https://broadbandusa.maps.arcgis.com/apps/dashboards/1725df85c8b94d0ab91f5807bcc91c39.

Does the CMC Pilot Program apply only to minority students and minority communities?

No. The CMC Pilot Program does not exclusively target minority students and minority communities. One of the key statutory requirements to receive program funding is addressing the greatest unmet financial needs across an institution's student body. Accordingly, CMC funds, programming and activities can be used to address the needs for connectivity, access, equipment, training, etc., across the entire student body and in the surrounding anchor communities. The institution's HBCU, TCU or MSI status is based on a legislative designation or percentage of minority student enrollment.

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[1] The U.S. Department of Education uses enrollment and financial data from the Integrated Postsecondary Education Data System (IPEDS) and Federal Student Aid (FSA) to determine the institutional eligibility for Titles III & V grant programs focused on Alaska Native or Native Hawaiian Serving Institutions (ANNH), Asian American Native American Pacific Islander Serving Institutions (AANAPISI), Hispanic Serving Institutions (HSI), Native American Non-Tribal Institutions (NANTI) and Predominantly Black Institutions (PBI). The eligibility criteria is based on the level of minority enrollment, percentage of receiving financial assistance and the level of core expenses per FTE (12-month undergraduate enrollment for the academic year).

How will NTIA determine if an educational institution is eligible to apply for the CMC program?

Please refer to the CMC Final Rule for the program's utilization and classification of HBCUs, TCUs and MSI institutions. An institution of higher education is eligible for CMC funding if it is a historically Black college or university (HBCU), Tribal College or University (TCU) or Minority-serving institution (MSI) based on information provided by the U.S. Department of Education. For HBCUs and TCUs, which have been legislatively defined, NTIA will use the data and information provided by the NCES to verify an institution's historical designation (*see* NCES College Navigator, https://nces.ed.gov/collegenavigator/). For MSIs, NTIA will use the most recently released Eligibility Matrix (https://www2.ed.gov/about/offices/list/ope/idues/eligibility.html) to determine if an educational institution is eligible or potentially eligible under the Alaska Native-serving institution/Native Hawaiian-serving institution (ANNH), Asian American and Native American Pacific Islander-serving institution (AANAPISI), Hispanic-serving institution (HSI), Native American-serving, non-Tribal institution (NASNTI), and Predominantly Black institution (PBI) grant programs (eligibility codes 4, 5 and 6). If an institution is potentially eligible on minority grounds (eligibility code 4), that institution must provide an approved waiver of the core expenses and/or needy student criteria with their application. *See* Department of Education, Office of Postsecondary Education, *Eligibility Designations and Applications for Waiver of Eligibility Requirements*, https://www2.ed.gov/about/offices/list/ope/idues/eligibility.html.

Are all the colleges and universities shown on the CMC Anchor Community Eligibility Dashboard designated as eligible institutions by the U.S. Department of Education?

Not necessarily. The CMC Anchor Community Eligibility Dashboard lists institutions that the U.S. Department of Education has determined to be potentially eligible on minority grounds (eligibility code 4), eligible to apply for the Title III and V MSI-focused grant programs (eligibility code 5) or current grantees of the relevant Title III and V grant programs (eligibility code 6) in their latest Eligibility Matrix. If an applicant is potentially eligible on minority grounds, that institution needs to provide an approved waiver of the core expenses and/or needy student criteria with their application to prove level of need.

What action can I take if my institution is not listed as an eligible HBCU, TCU or MSI institution, or is not shown on the CMC Anchor Community Eligibility Dashboard, but I believe that it is eligible for the CMC Pilot Program?

Please refer to the CMC Final Rule for the program's utilization and classification of HBCUs, TCUs and MSI institutions. As stated above, HBCUs and TCUs are legislatively defined pursuant to the Higher Education Act of 1965. MSI status is also defined by the Higher Education Act of 1965 and is granted by the Department of Education based on student enrollment. The U.S. Department of Education maintains a listing of HBCUs, TCUs, and MSIs and has a rigorous process for evaluation and qualification. Please refer to the application guidelines, contact names and request for eligibility determination on the Department of Education's website: https://www2.ed.gov/about/offices/list/ope/idues/eligibility.html#tips.

Please note that NTIA updated the CMC Anchor Community Eligibility Dashboard on September 9, 2021 to reflect the latest Department of Education-provided data.

Are satellite campuses, branch campuses, or extension offices eligible for CMC funding?

A satellite campus, branch campus, or an extension office of an eligible HBCU, TCU or MSI may only apply for the CMC Pilot Program if it operates and is recognized as a separate, independent entity. Generally, this means that the Department of Education has issued the entity its own unique Office of Postsecondary Education Identification Number (OPE ID). The OPE ID number is assigned by the U.S. Department of Education to identify schools that have Program Participation Agreements (PPA) so that its students are eligible to participate in Federal Student Financial Assistance programs under the Department's Title IV regulations.

Eligible Costs & Activities

May grant funds be used to deploy and/or improve existing broadband infrastructure that is not located on the campuses of the eligible educational institutions? In other words, are costs for the construction of off-campus broadband infrastructure allowable?

No. Eligible educational institutions may only use grant funds to install or upgrade broadband facilities on a one-time, capital improvement basis within their own campus locations. CMC funds cannot be used to construct, expand or deploy broadband networks or facilities to surrounding anchor communities. Broadband service subscriptions may utilize existing or new service providers, but CMC grant funds cannot be used to expand, deploy, build or construct new broadband infrastructure or facilities.

Regarding construction activities, the CMC Pilot Program prohibits traditional outside plant and network construction activities, i.e., ground disturbance activities that require

state and/or federal historic preservation and/or environmental review approvals. However, general in-building or classroom wiring, deploying fiber through existing conduit or trenches, installing wireless access/router/AP units, installing wireless transmission equipment are not considered construction activities and would be allowable under the CMC Pilot Program.

Can eligible educational institutions use CMC funds to provision broadband subscriptions, software licenses, laptops, hotspots, and other hardware and software for their students and faculty for educational and training purposes?

Yes, project costs related to the provision of broadband services, software, devices, and equipment for project activities related to education and training are generally allowable. See Section IV.J.1 of the NOFO for further information concerning the specific eligible uses of funding under the Connecting Minority Communities Pilot Program. Any institution that will provide broadband internet access service or eligible equipment must prioritize students in need and who lack broadband internet and/or broadband devices. Student need shall be determined in accordance with the following criteria:

a. Students who are eligible to receive Federal Pell Grants;
b. Students who receive any other need-based financial aid from the Federal Government, a State, or the eligible recipient;
c. Students who are qualifying low-income consumers for the purposes of the program carried out under 47 C.F.R. Part 54, Subpart E, or any successor regulations;
d. Students who are low-income individuals as that term is defined in section 312(g) of the Higher Education Act of 1965 (20 U.S.C. 1058(g)); or
e. Students who have been approved to receive unemployment insurance benefits under any Federal or State law since March 1, 2020.

See NOFO at Section 1.A and Appendix A: Certification regarding Compliance with Statutory and Programmatic Requirements.

Will projects that are currently underway, in which funds have been previously incurred, be eligible for retroactive CMC funding if the proposed project is part of a larger project?

No. Federal funds committed to an award under the CMC program may only be used to cover allowable costs incurred during the grant award's period of performance.

Applicants, if awarded grants, are allowed to use up to $50,000 in awarded funds towards the reasonable pre-application costs of preparing applications for this grant program as long as the costs were incurred between the publication date of the CMC

NOFO (August 3, 2021) and the award issuance date. Any pre-application costs should be clearly identified in the proposed project budget. Additionally, pre-application costs are incurred at the sole risk of the applicant and will not be reimbursed by NTIA if the proposed project does not receive an award pursuant to this program. *See* Section IV.J.1 of the NOFO.

Can multiple types of broadband services, support and training be proposed in an application?

Yes. An applicant may propose different types of broadband services depending on their institutional need, the needs of their students, and surrounding anchor community. However, broadband infrastructure may only be deployed on the eligible institutions' campuses and grantees may not engage in construction activities. *See* Section IV.J.2.d of the NOFO.

Other Federal Funding

If an eligible HBCU, TCU or MSI is awarded funding under other federal broadband grant programs (by other federal agencies) is it still eligible to apply for the CMC Pilot Program?

Yes, as long as there is no duplication of project activities or expenses between the proposed CMC project and the previously funded projects or activities.

Can an eligible TCU apply for the CMC program if it also submitted an application or is listed as a subrecipient in an application in NTIA's Tribal Broadband Connectivity Program (TBCP)?

Yes, as long as there is no duplication of project activities or expenses between the proposed CMC project and the proposed TBCP project or activities.

Can CMC funds can be used as match funding for other federal funding programs?

No, funds awarded under the CMC may not be used as match funding for any other federal funding programs. In general, federal funds may not be used to provide the non-federal cost share of a federal award, except as expressly authorized by federal statute. (*See* 2 C.F.R. § 200.306(b)(5).) The Consolidated Appropriations Act, 2021, which authorized the CMC, does not expressly authorize funds to be used as the non-federal cost share for another federal award. We are not aware of any other existing

federal program that allows CMC funds to be used as match funds for other federal funding programs.