

Connecting Minority Communities Pilot Program

Frequently Asked Questions

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.

Program Overview

Do the COVID vaccination requirements as stated in Executive Order 14042, *Ensuring Adequate COVID Safety Protocols for Federal Contractors* (September 9, 2021) apply to CMC grant recipients and their partners including sub-recipients, consortia members and/or subcontractors?

No, CMC grant recipients are not subject to the COVID vaccination requirements through this grant program. Per the [CMC NOFO](#), the funding instrument for this program is a grant award and Section 5(b)(i) of Executive Order 14042 expressly provides that grants are not subject to the COVID vaccination requirements described in the Executive Order's implementing guidance, released by the Safer Federal Workforce Task Force. However, receipt of a CMC grant or participation in a CMC-grant-funded project does not exempt an entity from complying with the Executive Order or the guidance if it is otherwise covered by the terms of the Executive Order.

We are proposing to conduct a program over a duration of two years. However, we expect to continue data collection, program analysis and program evaluation past period of performance of the grant award. Can CMC funding be used to cover the costs of activities beyond the initial two-year period of performance of the CMC Pilot Program?

NTIA has set the initial award period as no more than two years from the receipt of grant funds. However, NTIA may extend the initial award period if the eligible recipient certifies that (1) it has a plan for the use of the grant funds, (2) the execution or implementation of the project is underway, or (3) extenuating circumstances require an extension of time to allow the project to be completed. See Section II.B.1 of the CMC NOFO.

Eligible Applicants

Can multiple educational institutions collaborate or partner on a project that just serves students and/or builds institutional capacity without forming a consortium?

Yes, multiple schools can collaborate on a project that serves the needs of the educational institutions and their students without the need to form a consortium. The lead applicant must be an eligible HBCU, TCU, or MSI, and can include the other schools as subrecipients on the application. However, the following restrictions apply:

- 1) The participating schools must conduct programmatic activities only within the qualifying anchor community census tracts within the 15-mile radius of the eligible lead applicant

institution (*i.e.*, census tracts that have an estimated median annual household income of not more than two hundred and fifty percent (250%) of the poverty line). See Section III of the NOFO for additional information regarding the eligibility requirements of the CMC Pilot Program;

- 2) Any school that is listed as a subrecipient in an application is prohibited from submitting its own application as a lead applicant for CMC funding, even if it is an eligible HBCU, TCU or MSI; and
- 3) Any school that is listed as a subrecipient in an application is prohibited from participating as a Funded Project Participant in another CMC application.

Please note that the other schools do not need to be an eligible HBCU, TCU, or MSI to participate in a project as subrecipients or contractors. However, these schools will be required adhere to all grant laws, rules, and reporting requirements. Regardless of where the other school is physically located, the programmatic activities must be conducted at the lead institution or within the qualifying census tracts of the anchor community radius of the lead institution. In addition, an eligible institution cannot combine the designated anchor community radii of multiple campuses in one application.

Can a satellite location of an eligible HBCU, TCU or MSI be used to determine the 15-mile radius that defines the anchor community?

A satellite campus, branch campus, or an extension office of an eligible HBCU, TCU or can be used to determine the anchor community 15-mile radius **only if** the satellite location is recognized as a separate, independent entity and submits its own separate CMC application. 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.

When would an applicant apply as a consortium?

If an eligible applicant seeks to collaborate with an MBE and/or tax exempt 501(c)(3) to propose a project that serves the needs of their surrounding anchor community, the applicant could apply as a consortium subject to the following requirements:

- 1) The consortium must be led by an eligible HBCU, TCU or MSI higher education institution;
- 2) The consortium must include at least one MBE or tax-exempt 501(c)(3) organization; and
- 3) An eligible consortium must conduct community focused program activities only within qualifying census tracts within the 15-mile radius of the eligible lead institution (*i.e.*, census tracts that have an estimated median annual household income of not more than two hundred and fifty percent (250%) of the poverty line). See Section III of the NOFO for additional information regarding the eligibility requirements of the CMC Pilot Program.

Please note that a consortium could also be formed to conduct student and/or institutional based program activities at the lead institution. The above example focuses on a community-based project.

Can an eligible HBCU, TCU or MSI propose its own project that focuses on student needs, institutional needs and a consortium project that proposes to serve the surrounding anchor community in the same application?

Yes. Since an eligible HBCU, TCU or MSI can only submit one application per institution, an eligible school can serve as both the applicant for its own project, and as the lead of a consortium community-based project. Two program components, one single application.

We are located in a U.S. territory. How do we determine which census tracts are considered eligible anchor communities under the CMC program, since current U.S. Census data is not available here?

The American Community Survey (ACS) only covers the U.S. states, the District of Columbia, and Puerto Rico, however NTIA will accept 2010 Census data for the anchor community eligibility calculations for U.S. Territories - American Samoa, Guam, the Commonwealth of the Northern Mariana Islands (CNMI) and the U.S. Virgin Islands.

The methodology for determining anchor community eligibility is described in the CMC webinar conducted on May 5, 2021 available here - [NTIA Grant Program: Connecting Minority Communities Webinar, Session 1a | BroadbandUSA \(doc.gov\)](#). Anchor Community eligibility for each census tract can be calculated using the median household income and average household size. The 2010 Census data on Median Income and Average Household Size for American Samoa, Guam, the Commonwealth of the Northern Mariana Islands (CNMI) and the U.S. Virgin Islands is tabulated in Census Tables HCT11 and HBG available here <https://data.census.gov/cedsci/table?q=hct11%20hbg3>.

Additionally, an applicant may argue that a census tract initially designated by NTIA as ineligible under the anchor community eligibility methodology (i.e., the poverty threshold calculation) is in reality eligible, and explain why, based on supplementary Census Bureau data submitted with the application. Additional information regarding anchor community eligibility is available via the CMC Final Rule, CMC NOFO, and on the “About” tab on the [CMC Anchor Community Eligibility Dashboard](#).

If an eligible institution is awarded funding under another NTIA or federal broadband grant program, is it eligible to apply for the CMC Pilot Program?

Yes, if there is no duplication or overlap of the project costs allocated to the program activities, and the funds to be provided by the CMC Pilot Program would support a different program purpose and use than the other federal funds. Different program purposes may include creating new programs, implementing a previously funded program plan, extending an existing program to serve additional or new program participants, adding new program elements to scale existing programs, continuing a program after previously awarded federal grant funds have been expended or exhausted, or implementing new program improvements.

Each CMC application will be evaluated based on whether the project can be completed with CMC funds, and the project budget submitted to NTIA must reflect the project that can be completed with CMC funding. CMC funding cannot be used to pay for costs already covered by another source of funding.

If an eligible Tribal College or University (TCU) has already applied for funding from NTIA’s Tribal Broadband Connectivity Program (TBCP), can they still apply for CMC’s Program?

Yes, the TCU may still apply for funding from CMC, as long as there is no duplication or overlap of the project costs allocated to each project. However, if the TCU is awarded funding from the TBCP, they must ensure that proposed funds to be provided by the CMC Pilot Program would support a different program purpose (e.g., creating new programs, serving additional program participants in existing programs, adding new program elements to scale existing programs, continuing a program after

previously awarded federal grant funds have been expended, or implementing program improvements).

If an HBCU, TCU or MSI does not fall within a qualifying census tract but proposes to serve the surrounding communities that are within qualifying census tracts, is the institution eligible to apply?

An eligible HBCU, TCU or MSI is not required to be located within a qualifying census tract to receive CMC funding. Educational institution eligibility is based on whether the institution fits within the relevant statutory definition. See Section I.B.i-k, o of the NOFO. However, any proposed program activity that will serve the educational institution's surrounding anchor community must serve only those qualifying census tracts. See Section III.C.2 of the NOFO and the CMC Anchor Community Eligibility Dashboard at <https://broadbandusa.ntia.gov/cmcdashboard> for more information about anchor community eligibility and qualifying census tracts.

Eligible Expenses and Program Activities

Can an eligible institution use CMC funds together with existing federal funds to support the purchase a single item (e.g., splitting the purchase of a single piece of equipment between NTIA and Department of Education funds)?

No. Applicants should only submit applications to the CMC Pilot Program for specific projects – including equipment purchases – that can be completed with CMC funding, if awarded. (An eligible recipient may propose to contribute non-federal matching funds toward a CMC project, but this is not a CMC requirement and NTIA will not give additional consideration for applications proposing to contribute non-federal matching funds.) Further, CMC funds 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 Pilot Program, does not expressly authorize CMC funds to be used as the nonfederal cost share for another federal award. NTIA is not aware of any other existing federal program whose authorizing statute allows its funds to be used as match funds for CMC.

Can an eligible institution use CMC funds together with existing federal funds support the different aspects and activities of a multi-faceted program (for example, the training costs associated with previously funded devices and equipment)?

As discussed above, applicants should only submit applications to the CMC Pilot Program CMC for specific projects that can be completed with CMC funding, if awarded. (An eligible recipient may propose to contribute non-federal matching funds toward a CMC project, but this is not a CMC requirement and NTIA will not give additional consideration for applications proposing to contribute non-federal matching funds.) To the extent that your project could be expanded and/or supplemented using other grant funds, applicants may provide NTIA with that information in the application. But the application will be evaluated based on whether the project can be completed with CMC funds, and the project budget submitted to NTIA must reflect the project that can be completed with CMC funding. CMC funding cannot be used to pay for costs already covered by another source of funding.

Further, as also discussed above, CMC funds may not be used as match funding for any other federal grant programs. And other federal funds may not be used as match funding for a CMC grant.

Does the CMC Pilot Program apply only to students who reside in qualifying census tracts?

No, the geographic restrictions do not apply to students enrolled in the eligible HBCU, TCU or MSI. CMC funds, programming and activities can be used to address broadband connectivity, access, equipment, training, etc., for any enrolled student. However, one of the key statutory requirements to receive program funding is addressing the greatest unmet financial needs across an institution's student body. A grant recipient that lends or provides eligible equipment and/or broadband access to students must prioritize the lending or providing of such equipment or devices to students that the recipient believes do not have access to such equipment and/or broadband access.

Are work-based training and education programs such as apprenticeships and internships eligible for CMC funding?

Yes, work-based training programs such as apprenticeships and internships are eligible for CMC funding, including the costs of stipends, staffing, equipment and training, and other allowable costs in accordance with the cost principles identified in 2 C.F.R. Part 200. Please see Section J of the CMC NOFO for additional information about eligible and ineligible uses of CMC funds.

Application Requirements/Process

What data is required to prove the level of student unmet financial need? What should the applicant do if they don't have all of the data that the CMC NOFO requests (low-income consumer data, student unemployment, etc.)?

To determine the eligible anchor institutions with the greatest unmet financial need, NTIA will assess the following information for each institution:

1. Student population size
2. Number and percentage of students that are eligible to receive Federal Pell Grants
3. Number and percentage of students that receive other need-based financial aid from the Federal government, a State, or that institution
4. Number and percentage of students that 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))
5. Number and percentage of students that qualify as low-income consumers for the purposes of the program carried out under 47 C.F.R. Part 54, Subpart E
6. Number and percentage of students that have been approved to receive unemployment insurance benefits under any Federal or State law since March 1, 2020.

Currently, all accredited institutions of higher learning are required to submit annual student financial aid data (criteria 1-3 above) to the U.S. Department of Education's Integrated Postsecondary Education Data System (IPEDS). However, NTIA acknowledges that the low-income consumer and unemployment student data may not be readily available to eligible institutions. Therefore, applicants are encouraged to submit as much of the information as is reasonably available to the institution as well as supplemental data and information to include additional demographic, income, and employment data to illustrate the unmet financial need of their students and/or their target communities and program beneficiaries.