



INITIAL PROPOSAL VOLUME II

connectVI

Broadband Equity, Access and
Deployment (BEAD) Grant Program

GOVERNMENT OF THE UNITED STATES VIRGIN ISLANDS
USVI BROADBAND OFFICE



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Introduction

The US Virgin Islands Broadband Office (VIBO) is pleased to present the Initial Proposal - Volume II to meet the requirements of the Broadband Equity, Access, and Deployment (BEAD) grant program. This second volume is the VIBO's strategic plan for using the \$27.1 million from BEAD to bridge the digital divide in the U.S. Virgin Islands.

The Office of Management and Budget (OMB) has been designated as the Eligible Entity for the US Virgin Islands to execute the Broadband Equity, Access, and Deployment (BEAD) grant program, including creating the Initial Proposals. The staff of OMB interacted with a team of subject matter experts across the territory who have also helped inform this proposal. A key player in the transformation of broadband access, OMB and its staff have been entrusted with leading the program, ensuring that implementation is efficient, secure, and aligns with the community's needs.

This proposal addresses a range of requirements, including long-term broadband non-deployment objectives, support for local and regional planning, diverse workforce and business involvement, and strategies to reduce barriers to deployment. Volume II of the Initial Proposal includes requirements 1, 2, 4, & 8-20, with comprehensive descriptions of how the Territory will meet all the conditions of program guidelines. Volume II sets the stage for a comprehensive exploration of the program's goals and objectives, community benefits, and the strategies that will be implemented for successful execution.

All broadband stakeholders are welcome to review this proposal and provide as much constructive feedback as possible. The public comment period will be open for 30 days after this document's publication on November 16, 2023. Comments regarding the draft should be submitted via OMB's website at <https://www.omb.vi.gov/bead> by **11:59 PM ET on Saturday, December 16, 2023.**

The VIBO will review all submissions and consider recommendations for program execution. Following the assessment of received comments, and revisions to the proposal have been made, the VIBO will fulfill the requirement of submitting Volume II to NTIA for formal approval. The VIBO intends to maintain the timeline required by NTIA for the BEAD program to access grant funds. After the review process of both volumes, the VIBO hopes to secure approval from the National Telecommunications and Information Association (NTIA) to initiate the BEAD Challenge Process, marking a significant step toward addressing digital disparities in the US Virgin Islands.

The successful implementation of this program hinges on a collaborative approach involving various stakeholders, including government entities, private sector partners, and the local community. VIBO, through its ConnectVI program, eagerly anticipates strategic partnerships with the Territory's broadband stakeholders to deliver affordable, reliable, high-speed Internet access to every Virgin Islander. Any questions about the proposal or requests for clarification on any points can be sent to bead@omb.vi.gov.

SECTION 1 Objectives *(Requirement 1)*

The United States Virgin Islands (USVI), a picturesque and strategically located territory, is currently engaged in an ambitious plan to implement long-term solutions that will significantly enhance connectivity and provide “Internet for All” to its residents. This initiative is driven by the critical need to improve broadband access, a challenge that has been highlighted by the region’s vulnerability to natural disasters and the evolving global digital landscape. The USVI Broadband Equity, Access, and Deployment Program (BEAD) funding proposal is grounded in Governor Albert Bryan Jr.’s Vision 2040 Plan which is focused on prosperity for all Virgin Islanders.

This plan was produced in 2020 by the United States Virgin Islands Economic Development Authority (USVIEDA) and is the most comprehensive economic vision and strategy ever composed in the USVI. Vision 2040 was developed using community input gathered from over 3,000 surveys, virtual townhall meetings, public permeations, open houses, focus groups, working sessions, and stakeholder interviews. Several supporting plans and documents serve as background source data for the Vision 2040 Plan. In recent years, the territory has faced significant broadband challenges, with many areas experiencing limited access to high-speed internet for many reasons, from affordability to accessibility. This gap has impacted various aspects of life, including education, healthcare, and economic opportunities. The BEAD Grant provides a funding opportunity for the Territory to realize multiple aspects of Vision 2040 that align with broadband initiatives.

The Plan’s goals and objectives have been incorporated into a comprehensive strategy to invest BEAD funding into the distinct areas that will have the widest potential impact to achieve aspirations. Given this, the Government of the Virgin Islands (GVI) is choosing to prioritize digital equity- centric projects and programs with its \$27 million BEAD allocation consisting of four synergistic pillars: 1) Internet Access Affordability, 2) Economy Transformation, 3) Community Digital Competency, and 4) Workforce Upskilling.



Internet Access Affordability



Economic Transformation



Community Digital Competency



Workforce Upskilling

Internet Access Affordability

In recent years, the Virgin Islands has experienced significant need in internet accessibility, which has had a profound impact on various aspects of the island's society, economy, and culture. As a small territory, the Virgin Islands has recognized the importance of embracing technology and fostering a digitally inclusive society to ensure sustainable development and global competitiveness. With the reported costs higher than average for various communications, and overall cost of living 36.3% higher than mainland US, high-speed internet may seem like a luxury to many residents in the US Virgin Islands. It is equally important that all residents can afford fast and reliable internet, as broadband continues to be deployed throughout the islands. Some families, many of those in vulnerable populations, must choose between the monthly costs for internet and other basic household needs. This affordability barrier perpetuates the digital equity gap and affects general upwards mobility for those whose access to the world wide web is an opportunity to experience many facets of the world currently unknown to them.

The US Virgin Islands Broadband Office has no means of enforcing pricing without directly subsidizing internet pricing in the Territory. The proposed Internet Access Affordability program (ConnectVI) will provide immediate relief, while Fiber to the Home (FTTH) is being deployed under the Connect USVI award. The Connect USVI award will ensure every household in the Territory is connected to the internet and that Gigabit performance is made available to every resident in the Territory at an affordable rate.

The Connect USVI FTTH project is a major multi-year construction initiative. Due to rules regarding duplication, no other infrastructure deployment projects can receive federal funding for infrastructure deployment. Consequently, the VIBO is prioritizing internet affordability for BEAD funding. The VIBO is confident the Connect USVI FTTH project will accomplish the goal of delivering affordable high-speed internet to every home in the Territory. However, immediate price relief is needed, to help reduce the inflated cost of living in the U.S. Virgin Islands.

The VIBO proposes a rate subsidy program (ConnectVI) like the FCC's Affordability Connectivity Program (ACP). However, unlike ACP, which provides low-income residents a direct discount on their Internet bill, the VIBO's program will be available to Virgin Islanders who meet eligibility conditions outlined in the VIBO's Five-Year Plan. Middle class residents in the Territory who are just as constrained by high internet pricing as low-income families would be able to participate. The number of impacted households will be set by the VIBO according to its priorities to address unserved and underserved service areas across the territory. Details of the subsidy program are outlined in Requirement 16.

The VIBO will establish a committee, made up of relevant public, private, and non-profit stakeholders to develop a framework of prioritizing which communities are in the greatest need for reduced broadband pricing. This is necessary to ensure the ISPs deliver this program to the covered population and then to economically depressed areas. There will be a point of critical mass when enough of the population is served by this program that it will become the standard price performance for all residents.

The VIBO is confident this program will deliver the desired results because there has not been a moderating entity in the Territory to influence pricing. Such influence is necessary in a small market where dominant ISPs dictate pricing and access. In addition, future grant opportunities will be sought to bolster and extend this program's duration.

The USVI has excess fiber optic networks, however, *affordability* is the main challenge of the Territory. The VIBO's pricing strategy will help stimulate competitive market dynamics that are difficult to foster in small markets where the playing field is tilted towards the greater resourced ISP.

Digital Economy Transformation

One of the GVI's goals is to invest and accelerate the adoption of technology to transform the economy of the Virgin Islands so it is less reliant on tourism. This aim is also to create a diversified modern economy that can attract professionals from the Virgin Islands Diaspora to return home. The belief is that returning Virgin Islanders will bring best business practices and resources gained from around the world to advance the economic objectives outlined in the Vision 2040 Plan.

Among Virgin Islanders living outside the Territory, Vision 2040's survey found that eight (8) out of 10 Virgin Islanders would consider moving back to the USVI and 39% reported that job opportunities would be the top motivator to returning home. When asked which investments would have the most impact in encouraging their return, 21% stated that improvements in the energy and communications sectors were the most important, followed by the modernization of healthcare (16%) in the Territory.

The VIBO will use BEAD funding to create the public/private partnerships that will attract Virgin Islands Diaspora professionals, innovators, tradespeople, and educators back to the Territory to transform the economy by capitalizing on the global trend of economic digitization. This includes investing in:

- Shared business automation platforms (shared to gain economies of scale pricing);
- eGovernment management platforms (cloud services);
- Healthcare science technology solutions for public and private industry;
- Centralized service provider network cyber security upgrades;
- Telehealth platforms for entrepreneurs and additional remote territorial medical care; and
- Entrepreneurial funds to incubate innovative businesses.

Community Digital Competency

The VIBO intends to invest a significant amount of BEAD funding to outfit Multi-Purpose Computing Facilities (MPCF) on St. Croix and St. John. These MPCFs are re-imagined Public Computer Centers (PCCs) that are focused on digital-learning and workforce training.

Previously, the Territory had several PCCs that were equipped for digital learning and workforce training. These PCCs were either destroyed during the 2017 hurricanes, their equipment stolen or vandalized, or fell into disrepair due to a lack of maintenance. The new vision is safe, supervised, and well-maintained multi-purpose community spaces to conduct digital learning, workforce development, and digital literacy.

These spaces will include a digital life center where residents will be able to learn, play, and connect in an inspiring public area. The facilities will include central exhibition/conference areas to explore technology and host events and will also have adjoining spaces for community operated programs such as:

- Science, Technology, Engineering, Arts and Mathematic (STEAM)-based learning;
- Adult technical workforce development;
- Digital literacy workshops;
- Advanced technical training seminars;
- Community telehealth pods;
- Specialized/Advanced life and work skills Virtual Reality hubs;
- Robotic programming and skills training; and a
- Makerspace/Creativity lab.

The USVI does not have a readily accessible, state of the art, MPCF. The existing libraries and recreation centers in the Territory were either severely damaged in 2017, closed/decommissioned, or are too small to host large community gatherings. To fill this void, we will also address a recurring concern that has been raised by local stakeholders across the Territory during BEAD community engagements which was the absence of “safe,” comfortable spaces to operate community programs and deliver community-based services, while being conveniently located and easily accessible by public transit.

Upskilling the Workforce

The ability to recruit Virgin Islands Diaspora professionals back to the Territory depends on the availability of a capable workforce, especially one that is digitally inclined. Upskilling is also critical to retaining the Territory’s brightest and innovative young talent who are being pulled by the allure of greater prospects on the US Mainland. More people of the Virgin Islands Diaspora would stay in the Territory if there were meaningful well-paying job opportunities.

The VIBO will partner with the Virgin Islands Department of Labor (VIDOL) to accelerate and increase investments in upskilling and reskilling Virgin Islanders to meet the needs of a modern, knowledge-based economy. Much of this training will be done through public/private partnerships. Locally, there are several credentialed, non-profit entities that are capable of this task. This training can occur at any MPCF location.

The VIBO will emphasize preparing Virgin Islanders for employment in sectors related to Information Technology (IT). Currently, only 2% of the Virgin Islands workforce is employed in this sector while IT positions within the VI Government remain vacant due to a limited pool of qualified IT professionals from which to draw. This is exacerbated by the fact that the USVI has a limited population of approximately 87,000 persons, including children and seniors, as determined by the most recent census. The lack of an experienced IT and technology talent pool is a drag on the local economy.

The dearth of IT professionals in the Territory also hinders the ability to recruit businesses to relocate to the Virgin Islands which is a necessity for the diversification of the USVI economy from a tourism-based to a knowledge-based economy. This involves creating a pipeline of skilled Virgin Islanders that begins at kindergarten, is nurtured through middle and high school, and is matured in higher education.

Regions, states, and nations have positioned themselves to prosper in this new economy. The 2040 Vision Plan acknowledges that the world is two decades into what many have called the knowledge economy. The USVI has not yet made the transition and is far behind in developing an innovation ecosystem that adequately supports entrepreneurship and establishes the territory as a pro business climate to support fast growing businesses.

SECTION 2 Local, Tribal, and Regional Broadband Planning Processes *(Requirement 2)*

The Virgin Islands Broadband Office (VIBO) recognizes the unique needs and barriers to closing the digital divide in the Territory, and the various local stakeholders that must be engaged to support the communities disproportionately impacted by digital inequity in the Virgin Islands. As the agency charged with preparing and managing the budget for the Territory, OMB is well-positioned to stay informed of, and coordinate with, other planning efforts related to telecommunications and digital equity.

Assessing existing efforts is the first step to understanding broadband readiness throughout Virgin Islands. The identified efforts preposition the territory for success. The level of initial coordination and engagement is a critical strategy for ensuring that broadband funds are spent appropriately. Ongoing interactions with local communities will continue to be a priority moving forward in the implementation of BEAD. VIBO will undertake various steps to support local, Tribal, and regional broadband planning processes and ongoing efforts to deploy broadband or close the digital divide. These steps include:

1. **Stakeholder Engagement:** VIBO will actively engage with local, Tribal, and regional governments, as well as other relevant entities, to understand existing broadband planning efforts and ongoing initiatives and to ensure comprehensive input and participation from all relevant residents and businesses in the territory. This will involve organizing stakeholder meetings, workshops, and forums to facilitate collaboration, information sharing, and coordination of efforts. The process has already commenced with public engagements around digital equity and inclusion, which will also inform the Territory's Digital Equity (DE) Plan and Five-Year Action plan that is currently being prepared. These public engagements included "townhall" meetings, senate hearings, and discussions around digital equity and inclusion via local media outlets. Stakeholder engagement will continue throughout the life of the BEAD planning process.

2. **Information Sharing and Resource Allocation:** VIBO will share relevant data, resources, and best practices with local, Tribal, and regional entities to support their broadband planning efforts. This will include providing access to mapping data, technical assistance, funding opportunities, and expertise to inform decision-making and strategic planning. In addition, the BEAD website allows for broadband stakeholders to subscribe to receive grant program notifications.

3. **Coordination of Planning Efforts:** VIBO will coordinate its own broadband planning efforts with those of local, Tribal, and regional governments to avoid duplication of efforts and maximize resources. This will involve aligning goals, objectives, and timelines, as well as sharing information and coordinating activities to ensure a cohesive and comprehensive approach to broadband access for all Virgin Islanders. Moreover, the VIBO will continue to coordinate with the Bureau of Information Technology (BIT) and the Office of Health Information Technology (OHIT) for mutual information-sharing and coordination.

4. **Needs Assessment and Gap Analysis:** VIBO will conduct a needs assessment and gap analysis to identify areas within the Virgin Islands where broadband access is lacking or inadequate. This may involve gathering input from stakeholders, conducting surveys, and analyzing existing data to understand the extent of the digital divide and prioritize areas for intervention.

5. **Development of Strategic Plans:** Based on the needs assessment and gap analysis, VIBO will develop strategic plans to guide broadband efforts in the Virgin Islands. These plans will outline goals, objectives, strategies, and action steps to address identified gaps and improve broadband access and adoption.

6. **Policy and Regulatory Support:** VIBO will advocate for policies and regulations that support broadband access and close the digital divide in the Virgin Islands. This will involve working with local, Tribal, and regional governments to streamline permitting processes, incentivize investment in broadband infrastructure, and remove barriers to competition and innovation.

7. **Monitoring and Evaluation:** VIBO will establish mechanisms to monitor and evaluate the progress of broadband implementation efforts in the Virgin Islands and assess their impact on closing the digital divide. This may involve tracking key performance indicators, conducting surveys and assessments, and soliciting feedback from stakeholders to inform continuous improvement efforts.

By undertaking these steps, VIBO will support local, Tribal, and regional broadband planning processes and ongoing efforts to facilitate broadband access for all and close the digital divide in the Virgin Islands. This collaborative and coordinated approach will help maximize resources, leverage expertise, and ensure that broadband efforts are strategic, equitable, and effective in addressing the needs of the community.

In November 2023, the Virgin Islands Broadband Office took a significant step in its outreach efforts by hosting the Internet For All workshop in the Virgin Islands. The workshop served as a platform for territorial representatives to engage in discussions centered on the transformative potential of broadband access for residents. Key topics included the tangible benefits of broadband, such as improved access to essential services and increased economic opportunities for individuals and businesses alike. Additionally, representatives delved into the various grant opportunities available to bolster broadband access and enhance digital equity across the territory. These grants were highlighted as crucial resources for advancing connectivity and ensuring that all stakeholders can reap the benefits of an interconnected digital world.

The workshop's agenda was packed with panel discussions designed to solicit input and insights from the community. These discussions aimed to gather diverse perspectives on the challenges and opportunities surrounding broadband access and digital equity in the Virgin Islands. By actively involving stakeholders in these conversations, the Virgin Islands Broadband Office sought to ensure that the resulting Five-Year Action plan would be informed by the needs and aspirations of the community it serves.

Overall, the Internet For All workshop represented a proactive effort by the Virgin Islands Broadband Office to catalyze progress toward universal broadband access and digital inclusion. Through collaboration, dialogue, and strategic planning, the workshop laid the groundwork for meaningful initiatives aimed at bridging the digital divide and empowering all residents to thrive in the digital age. To this end, stakeholder engagement will continue throughout the life of the BEAD planning process. By actively involving stakeholders throughout the life of the BEAD planning process, the Virgin Islands Broadband Office has maximized the impact and effectiveness of its initiatives, ultimately leading to more equitable access to broadband and digital opportunities for all residents.

SECTION 3 Local Coordination *(Requirement 4)*

Stakeholder engagement is vital for ensuring the goals align with the needs and expectations of the community. The U.S. Virgin Islands Broadband Office will build upon the community engagement and outreach conducted by the Territory's DE Team to gather feedback from residents, leaders, and other stakeholders on how BEAD funding could be used to address the VIBO's four synergistic pillars of 1) Internet Access Affordability, 2) Economy Transformation, 3) Community Digital Competency, and 4) Workforce Upskilling. While the VIBO got a late start implementing the BEAD program, an array of outreach initiatives has been undertaken to gain a deeper understanding of community needs.

This includes continuous dialogue and listening sessions with residents, local businesses, government agencies, educational institutions, and healthcare providers and conducting surveys and interviews with key stakeholders. Engaging these stakeholders will provide valuable insights into local requirements, helping to tailor the project to meet specific community needs. Furthermore, such engagement promotes transparency and fosters a sense of community ownership of the program.

The purpose of these engagements will be to better understand the gaps in, and barriers to, workforce development in these respective areas, and among covered populations, to determine how BEAD funding can be leveraged to advance workforce development priorities and transform the local economy. The community stands to benefit significantly from the enhanced broadband access and the plethora of opportunities that will be afforded. Improved internet access will facilitate better educational opportunities, particularly in remote learning scenarios. Healthcare services will be bolstered through telemedicine capabilities, especially important in rural and underserved areas. Furthermore, reliable, and high-speed internet will serve as a catalyst for economic growth, enabling local businesses to expand their reach and compete in a global market. Additionally, the project will prioritize inclusivity, ensuring that vulnerable populations, including low-income households, the elderly, and individuals with disabilities, gain access to the digital world.

Several local government agencies will be engaged to strengthen the Territory's BEAD Plan. These agencies include the Virgin Islands Bureau of Corrections (BOC), Virgin Islands Workforce Development Board (VIWDB), USVI Economic Development Authority USVIEDA, the University of the Virgin Islands (UVI), the Virgin Islands Department of Education (VIDE), the Department of Health (DOH), the Department of Human Services (DHS), BIT, and OHIT. The Collaborations will also ensure VIBO's alignment with the strategic plans of these agencies that are key to closing the digital divide in the Territory.

The VIBO is already facilitating regular meetings with GVI stakeholders. These meetings will be critical in understanding the needs of agencies that serve covered populations across the Territory. Internet Service Providers (ISPs) and broadband advocates have also been consulted in the development of the Territory's BEAD Plan, consequently, outreach and communication with the private sector will also remain a priority.

The sections below outline the five BEAD NOFO criteria the VIBO has met and will continue to address in all local coordination efforts.

Geographic Coverage: The US Virgin Islands Broadband Office recognizes the importance of full participation within territory and has engaged with stakeholders in all three islands on high-speed internet access affordability and digital equity plans. The VIBO and its territory DE partners also launched surveys of residents and community leaders throughout the Virgin Islands to complement live community listening sessions to share their service experiences and needs for internet access affordability in various geographic areas of the islands. Respondents who attended offered their experiences and will continue to inform planning in follow-up meetings throughout implementation, additional listening sessions, and coordination with community anchor institutions across the Virgin Islands during development of the Final Proposal.

Diverse Stakeholder Groups: The VIBO has coordinated with public service, private sector, and community-serving stakeholders throughout planning and in development of this Initial Proposal. At the Internet for All: US Virgin Islands Local Coordination Workshop, Smart Island Summit, the VIBO convened over 100 stakeholders from across the territory, the telecommunications industry, academia, community advocacy, and government to inform strategies for high-speed internet access affordability and digital equity. In partnership with other government entities, the VIBO continues to meet with stakeholders, including the public, to solicit feedback on the proposed programs. The VIBO will describe the major funding programs, subgrantee selection, and other key plans outlined in this proposal to multiple stakeholder groups, including workforce contacts, for feedback. The VIBO will ensure ongoing coordination with diverse stakeholders following submission of this Initial Proposal, including in subgrantee program scoring criteria that will prioritize coordination between internet service providers, local governments, and underrepresented communities.

Multiple Awareness and Participation Mechanisms: The VIBO has begun to share materials at in-person meetings and events as part of the marketing campaign for the program. Residents can access the program's contact information to communicate with a VIBO support staff member by email or by subscribing for notifications on the VIBO's landing page. Continuous updates include upcoming events, latest news, and soliciting Requests for Proposals to partner with the VIBO. A combination of traditional and social media has supported the VIBO's awareness efforts. Updates have been and will continue to be shared in

press releases, social media, public radio, and in newspapers. To receive public comments, the US Virgin Islands Broadband Office has posted public comment drafts online and announced comment periods through official press releases. The VIBO has accepted feedback through online comment form, during listening sessions, and in meetings with stakeholders. Transparency The VIBO has developed clear procedures to promote transparency throughout implementation of BEAD funding. At <https://www.omb.vi.gov/bead>, residents can access all submissions to NTIA, upcoming events, contact information, and additional plan materials. In addition to involving a diverse set of stakeholders in planning meetings, as described above, the VIBO will develop brief reports on broadband efforts to accompany NTIA submissions, including reports on the outcomes of public comment periods and their impact on planning.

Underrepresented Engagement: The US Virgin Islands Broadband Office incorporates information from meetings with community organizations and data collection focused on the needs of residents in underrepresented communities. As technology continues to advance, the digital divide becomes a growing concern, especially for those residing in rural areas. The lack of access to the internet and technological resources creates a significant barrier to equal opportunities in education, healthcare, and financial access. The disparities in access to digital resources are deeply rooted in structural inequities, and it is essential to address these issues to ensure that everyone has equal access to the benefits of digital technology.

Digital innovations have the potential to empower marginalized communities, by providing access to financial resources previously unavailable to them. In the pursuit of digital equity, it is imperative for policymakers to recognize and address the systemic barriers that contribute to technological inequity. By fostering awareness and taking proactive measures to bridge the digital divide, the VIBO will create a more inclusive and equitable society, where everyone can benefit from the advancements in technology.

The VIBO will host subgrantee technical assistance workshops to discuss the requirements to become qualified to receive BEAD funding. Topics of discussion will include, but not limited to, the following:

- How to become qualified for funding
- Future publications, announcements, and event calendar
- Points of Contact and Responsiveness
- Technical Assistance
- Grant Requirements
- Reimbursement Process
- Non-Compliance Outcomes
- Bidding and Application Process
- Proof of Funding
- Application Evaluation
 - First, Technical, and Final Review
 - Conflict of Interest
 - Evaluation and Scoring

Lastly, nurturing and expanding relationships with local non-profit organizations and advocacy groups will be fundamental in addressing the needs of communities that have been disproportionately impacted by digital inequity in the Territory. VIBO will work with the DE Team, who have been the primary interface with the community around digital equity and

inclusion in the Virgin Islands, on how BEAD funding, and VIBO's four pillars, can best meet the needs of local covered populations. Progress on the Territory's BEAD Five-Year Plan and implementation will be periodically provided to the public with feedback being solicited along the way.

As a required attachment, the file (labeled Local Coordination Tracker.xlsx) certifies that the VIBO has conducted coordination with local community organizations, work organizations, and other groups.

As technology continues to advance, the digital divide becomes a growing concern, especially for those residing in rural areas. The lack of access to the internet and technological resources creates a significant barrier to equal opportunities in education, healthcare, and financial access. The disparities in access to digital resources are deeply rooted in structural inequities, and it is essential to address these issues to ensure that everyone has equal access to the benefits of digital technology. Digital innovations have the potential to empower marginalized communities, by providing access to financial resources previously unavailable to them.

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SECTION 4 Deployment Subgrantee Qualifications

(Requirement 8)

The use of BEAD funding for deployment purposes would be considered duplicative, due to the award of the Connect USVI grant from the Federal Communications Commission (FCC). Therefore, the US Virgin Islands Broadband Office will not utilize BEAD funds to deploy or sustain broadband infrastructure projects within the territory, whether it be public or private sector networks.

SECTION 5 Non-Deployment Subgrantee Qualifications

(Requirement 9)

The BEAD grant will not be utilized for infrastructure deployment due to the award of the Connect USVI grant from the Federal Communications Commission (FCC). Thus, all subgrantees will be selected for non-deployment projects exclusively. The VIBO's focus for the use of the BEAD funding and subgrantee selection will be centered around the following areas:

- Access and Affordability
- Workforce Development
- Digital Literacy and Security
- Economic Transformation
- Telehealth

VIBO understands that to efficiently utilize the BEAD grant to achieve our long-term goals and objectives, it will require acquisition of subgrantees to facilitate components of our vision. From this realization, steps have already been taken to create a team made up of subject matter experts from across the government to review and approve subgrantee applications. A review panel comprising subject matter experts, industry professionals and other relevant stakeholders, including "lived experts" such as affected residents, representatives from community anchor institutions or community leaders from faith-based, business-based, and non-profit organizations will all be considered. During the assessment process, a comprehensive scoring rubric will be utilized to evaluate the submitted proposals. Panel members, possessing the requisite expertise, will meticulously review each application against the predetermined evaluation criteria.

The proposed scoring criteria, meticulously outlined for non-deployment activities, encompass various facets crucial for project success, including technical merit, qualifications, local coordination, project budget, and other pertinent factors. Each criterion is assigned a specific point value, totaling to 100 points, ensuring a methodical and equitable assessment. Reviewers will diligently score all submissions that pass the initial vetting phase and risk assessment using this structured template.

The US Virgin Islands Broadband Office (VIBO) will then select potential subgrantees based on their average score and non-overlapping project locations. Subsequently, the VIBO will proceed to approve and fund proposals in descending order of their scores until all available funds are expended. Moreover, safeguards will be implemented to promote diversity and inclusion across all goals and geographic regions.

The negotiation of a mutually acceptable Grant Agreement within 21 calendar days further ensures transparency and fairness in the selection process, bolstering the defensibility against any potential allegations of bias or impropriety. Panel members will be required to disclose any conflicts of interest that may arise from their participation in the process.

The VIBO will ensure that appropriate steps are taken to prevent bias, collusion, arbitrary decisions, and any other factors that could undermine the process. If any impropriety is identified, the VIBO will work with the government's legal team to ensure appropriate actions are taken, the issue is mitigated, and any awarded funds are rescinded or clawed back.

To date, the all-volunteer team is comprised of the Director of the Office of Management and Budget (OMB), Director of the Bureau of Information Technology (BIT), Commissioner of the Department of Labor (DOL), Director of the Office of Health Information Technology (OHIT) and the future Director of the VIBO. The solicitation of subgrantees will begin once the Broadband Office posts Volume I and II for public comment and receives final approval from NTIA.

The VIBO wants to ensure that all potential subgrantees are aware of the opportunity at hand. Outreach be conducted using the methods below:

1. Community Workshops and Information Sessions:
 - a. Organize community workshops and information sessions at various locations across St. Croix, St. John and St. Thomas to provide potential applicants with detailed information about the sub-grant opportunities.
 - b. Partner with local community centers, schools, churches, and civic organizations to host these events and reach a diverse audience.
 - c. Invite representatives from the grant program to present eligibility criteria, application procedures, funding priorities, and evaluation criteria.
 - d. Allow ample time for questions, discussions, and networking opportunities during the workshops to engage participants and address their concerns.
2. Printed Materials and Flyers:
 - a. Develop and distribute printed materials such as brochures, flyers, posters, and pamphlets to promote the sub-grant opportunities and encourage participation.
 - b. Display these materials at key locations frequented by the target audience, including government offices, libraries, community centers, supermarkets, and local businesses.
 - c. Ensure that printed materials are available in multiple languages and accessible formats to accommodate diverse communities and individuals with disabilities.

3. Media Campaigns and Publicity:
 - a. Launch media campaigns to raise awareness of the sub-grant opportunities through press releases, newspaper advertisements, radio announcements, and television interviews.
 - b. Collaborate with local media outlets, journalists, and influencers to feature stories, articles, and interviews highlighting the importance of the grant program and its impact on the community.
 - c. Leverage social media platforms such as Facebook, Twitter, Instagram, and LinkedIn to disseminate information, share success stories, and engage with potential applicants online.
4. Email Newsletters and Mailing Lists:
 - a. Develop an email newsletter or mailing list to regularly communicate updates, announcements, and reminders about the sub-grant opportunities to interested individuals and organizations.
 - b. Encourage interested parties to subscribe to the newsletter or mailing list through the program's website, workshops, and outreach events.
 - c. Personalize email communications and tailor messages to specific target audiences based on their interests, needs, and preferences.
5. Partnership and Collaboration:
 - a. Forge partnerships and collaborations with local nonprofits, community-based organizations, government agencies, educational institutions, and business associations to amplify outreach efforts and reach underserved communities.
 - b. Engage partner organizations as ambassadors and advocates for the grant program, encouraging them to promote the sub-grant opportunities within their networks and constituencies.
 - c. Offer training, resources, and technical assistance to partner organizations to empower them to support potential applicants throughout the application process.
6. Mobile Outreach and Pop-Up Events:
 - a. Conduct mobile outreach activities and pop-up events at high-traffic locations such as markets, festivals, fairs, and community gatherings to engage with residents and potential applicants.
 - b. Set up information booths, displays, and interactive activities to attract attention and encourage participation in the grant program.
 - c. Distribute promotional materials, giveaways, and incentives to incentivize attendance and interest in the sub-grant opportunities.

By implementing these outreach strategies and engaging with the community through various channels and platforms, the VIBO can ensure broad participation and access to sub-grant opportunities among diverse stakeholders, ultimately fostering inclusive economic development and community empowerment.

Before subgrantee selection is completed, the VIBO will select subgrantees on their ability to meet the qualifications below:

1. Capability to carryout activities funded by the subgrant in a competent manner in compliance with all applicable federal, Eligible Entity, and local laws;

- a. Applicants must prove to VIBO that they have sufficient staff to dedicate themselves to the subaward, the capacity to carry out the work, applicant's experience with similar projects and ability to comply with local and federal laws.
2. Has the financial and managerial capacity to meet the commitments of the subgrantee under the subgrant, the requirements of the Program and such other requirements as have been prescribed by the Assistant Secretary or the Eligible Entity; and
 - a. Applicants must present an organizational chart to show that they are structured in a multilevel format with multiple review and approval levels to prevent waste, fraud, and abuse. Proof of funding certificate to show that the organization has enough cash on hand to begin the project without a cash advancement and a cash flow statement to prove that they generate enough cash to sustain the projects without any working capital advance.
3. Has the technical and operational capability to provide the services promised in the subgrant in the manner contemplated by the subgrant award.
 - a. Resumes for all employees involved in the execution of the projects will be evaluated to ensure that the organization possesses the capability to execute the project. The applicant will be evaluated based on past projects completed.

The US Virgin Islands Broadband Office is responsible for ensuring all prospective subgrantees meet the qualifications outlined in the BEAD NOFO. The VIBO will use preliminary qualification guidelines and risk assessment scores in a gating phase for subgrantees to be eligible to advance to final proposal review.

This review period will be publicized on the BEAD website with extensive details on the prequalification process. The VIBO will open a 60-day gating period to conduct preliminary assessments of potential subgrantees. Initial agency profile submissions will be reviewed from a subgrantee questionnaire that will be made available online via the BEAD website. At the commencement of the open period, prospective subgrantees must attest to and certify in areas covering; but not limited to, financial capacity, managerial capacity, technical and operation capability, and compliance with laws.

Request For Applications being published will allow potential subgrantees to apply based on three different criteria; location, category or, the subgrantee can propose a project based on a specific need that they have identified and would like to pitch. This means an RFA might include a location with multiple service areas, a category with multiple service locations, or a request for proposal. A similar process was applied during OMB's funding of ARPA (American Rescue Plan Act) projects in the territory over the last few years.

Proposals were not exclusively restricted to preset criteria; rather, applicants were encouraged to be innovative and submit grant applications outside the identified focus areas. Some preferred projects will be pre-defined by the VIBO, based on identified needs and existing stakeholder engagements. However, the VIBO will welcome and consider projects that are aligned with the objectives outlined in Requirement 1 as well as, but not limited to, initiatives that will unlock new economic opportunities, enhance educational resources, improve healthcare through telemedicine, and strengthen disaster resilience. If a potential subgrantee applies based on category or location, then said potential subgrantee must submit

a plan to serve all entities in the category or locations in the RFA. The publication of RFAs will include a questionnaire, a list of locations with geographic coordinates, a list of existing broadband infrastructure in the project area, and a VIBO project cost analysis. All publications will be posted on <https://omb.vi.gov/bead/>.

The RFAs will emphasize to potential subgrantees the importance of aligning their long-term goals and objectives with that of the VIBO and with the Infrastructure Act and BEAD NOFO. Once applications have been submitted, the VIBO will begin the evaluation process based on the following guidelines:

1. **First review** - This will include an application review to ensure the submission includes all required information.
2. **Technical Review** - The review team comprised of subject matter experts shall conduct a review to ensure that the proposal submitted in the application is achievable in the time proposed project period, the budget narrative is feasible, and the proposed result is achievable.
3. **Extensive Review** - A review will be done based on the Comprehensiveness of the plan submitted to include budget, timeline and meeting the needs of the underserved population.

A subrecipient's risk assessment will be conducted to determine if there is any fraud risk associated with the prospective subrecipient. The risk assessment will take into consideration factors such as:

- Whether the subrecipient is subject to an audit or other federal financial reviews
- The degree of external oversight by auditors
- Evidence of effective financial controls within the subrecipient's ERP system and administrative operation
- Government of the Virgin Island's prior experience with the subrecipient,
- The life of the subrecipient's organization
- Performance with prior awards
- Scope of work, deliverables, budget
- Experience with similar projects
- Proof of funding and funding sustainability

Once the application review process has been completed, the VIBO team will then move to the organization review phase. This phase will consist of an in-depth review of the applicant to ensure that they are an eligible entity to receive BEAD funding. This will include a request for information (RFI) from the applicant to provide details about their company.

This will include:

- Organizational chart to show that they are structured in a multilevel format with multiple review and approval levels to prevent waste, fraud, and abuse.
- Proof of funding - Proof of funding certificate to show that the organization has enough cash on hand to begin the project without a cash advancement.

- Account Analysis - Detailed analysis of their operations to show cashflow that can sustain the proposed project without the future need of working capital from the VIBO.
- Business plans to include the proposed BEAD - A detailed business plan showing how the proposed BEAD project has been incorporated into their long-term vision for the company.

Risk Assessment Questionnaire

Subrecipient Institution		
Subject to Single Audit?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Relevant Findings?	Yes <input type="checkbox"/>	No <input type="checkbox"/>
Internal Project Identifier		
Prime Sponsor		
DUNS		
FAC/EIN		
<i>See other tab for guidance and frequently asked questions</i>		

Threshold Questions (Not Scored)

If yes to 1, 2, or 3, consider alternatives to initiating agreement:

- | | | |
|--|--------------------------|--------------------------|
| | Yes | No |
| 1. Is the Subrecipient Institution presently debarred or suspended? | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. Is the Subrecipient Institution's PI presently debarred or suspended? | <input type="checkbox"/> | <input type="checkbox"/> |
| 3. Does the Subrecipient show "delinquent federal debt" in SAM? | <input type="checkbox"/> | <input type="checkbox"/> |

If no to 4, 5, 6, or 7, consider alternatives to initiating agreement:

- | | | |
|---|--------------------------|--------------------------|
| | Yes | No |
| 4. If required by the sponsor, does the Subrecipient have a compliant conflict of interest policy? | <input type="checkbox"/> | <input type="checkbox"/> |
| 5. Does the Subrecipient have an acceptable accounting system? | <input type="checkbox"/> | <input type="checkbox"/> |
| 6. Does the Subrecipient have an acceptable procurement system? | <input type="checkbox"/> | <input type="checkbox"/> |
| 7. If required, has the Subrecipient completed audit under A-133 or Uniform Guidance for the most recent fiscal year? | <input type="checkbox"/> | <input type="checkbox"/> |

Other Considerations (Not Scored)

- | | | |
|---|--------------------------|--------------------------|
| 8. Has there been a PTE-issued management decision on audit findings that may affect this award? | <input type="checkbox"/> | <input type="checkbox"/> |
| 9. Does the Subrecipient have a negotiated indirect cost rate (or experience setting up such a rate)? | <input type="checkbox"/> | <input type="checkbox"/> |
| 10. Does the project align with BEAD NOFO | <input type="checkbox"/> | <input type="checkbox"/> |
| Does the subrecipient answer questions on page 71-72 of NOFO | <input type="checkbox"/> | <input type="checkbox"/> |
| 11. Is there a potential or identified conflict of interest? | <input type="checkbox"/> | <input type="checkbox"/> |
| 12. Is costflow statements included? | <input type="checkbox"/> | <input type="checkbox"/> |
| 13. Can participant support the project without VIBO funding? | <input type="checkbox"/> | <input type="checkbox"/> |
| 14. Does the Subrecipient have adequate experience receiving same or similar federal awards? | <input type="checkbox"/> | <input type="checkbox"/> |
| 15. Have other risks been identified? <i>If yes, explain in Notes below.</i> | <input type="checkbox"/> | <input type="checkbox"/> |

Notes:

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Institution Questions (Scored)

Score

- Is the Subrecipient institution foreign or domestic?
- What is the Subrecipient Organization type?
- Does the Subrecipient have the management dedicated to the grant?
- Were the results of the most recent Single audit (or similar) satisfactory?
- Is the Subrecipient Institution mature?
Subrecipient experience 10+ years
- Does the Subrecipient Institution have experience with determining conflicts of interest (evidence of an acceptable COI Policy)?
<click to select>

Project Questions (Scored)

- What is the Prime Sponsor type?
<click to select>
- What is the Prime Award type?
- Cost of project?
<click to select>
- What is the percentage of the Prime Award being subcontracted (specific to this Subrecipient—not total)?
<click to select>
- Does the subrecipient have experience similar to project requirement, or specialize in project field?
<click to select>
- What are the Subrecipient's Scope of Work/Deliverables?
<click to select>
- Where is the Performance Period?
<click to select>

<i>Assessment Performed:</i>	
Initials	Date

Assessment Incomplete

Assessed Risk	Score
Institution	0
Project	0
Total	0

All factors listed on the assessment will be evaluated, and an assessed risk score will be generated.

Due to other funding commitment from the Federal Government, BEAD Grant funding cannot be used for deployment activities.

To ensure transparency and fairness in the evaluation process for non-deployment projects, the VIBO will develop comprehensive evaluation criteria. Here's an outline of the process VIBO plans to use to develop these criteria:

1. Establishment of Evaluation Committee:
 - a. USVI will establish an Evaluation Committee comprising qualified individuals with relevant expertise in the subject matter areas of the grant program.
 - b. The Evaluation Committee may include representatives from government agencies, academia, industry experts, and community organizations.
2. Review of Program Objectives and Priorities:
 - a. The Evaluation Committee will review the objectives, priorities, and goals of the grant program to ensure that the evaluation criteria align with these overarching aims.
 - b. This step ensures that the evaluation criteria reflect the intended outcomes and impact areas of the grant program.
3. Identification of Key Performance Indicators (KPIs):
 - a. The Evaluation Committee will identify key performance indicators (KPIs) that measure the success and effectiveness of non-deployment projects.
 - b. KPIs may include metrics related to project impact, innovation, scalability, sustainability, community engagement, and alignment with program objectives.
4. Development of Evaluation Criteria:
 - a. Based on the identified KPIs, the Evaluation Committee will develop specific evaluation criteria that assess the quality, feasibility, and impact of non-deployment projects.
 - b. Evaluation criteria may include factors such as project relevance, clarity of objectives, methodology, feasibility, budget justification, sustainability plan, and capacity-building components.
5. Scoring Rubric and Weighting:
 - a. VIBO will develop a scoring rubric that assigns point values to each evaluation criterion based on its relative importance.
 - b. The scoring rubric will provide clear guidelines on how proposals will be evaluated and scored, ensuring consistency and objectivity in the evaluation process (please see section 02.05.04 Non-Deployment Subgrantee Qualifications).
6. Transparency and Communication:
 - a. USVI will communicate the evaluation criteria, scoring rubric, and weighting system to potential applicants through the Request for Proposals (RFP) and other program documentation.
 - b. The RFP will include detailed instructions on how applicants can address each evaluation criterion and earn maximum points.

7. Training and Technical Assistance:
 - a. USVI may offer training sessions, webinars, or workshops to assist potential applicants in understanding the evaluation criteria and preparing competitive proposals.
 - b. Technical assistance may be provided to help applicants develop project proposals that align with the evaluation criteria and maximize their chances of success.
8. Pilot Testing and Feedback:
 - a. Before finalizing the evaluation criteria, VIBO may conduct pilot testing with a sample of proposals to assess the effectiveness and feasibility of the criteria.
 - b. Feedback from pilot testing participants will be solicited to identify areas for improvement and refinement of the evaluation criteria.
9. Finalization of Evaluation Criteria:
 - a. Following feedback and revisions, VIBO will finalize the evaluation criteria and incorporate them into the evaluation process for non-deployment projects.
 - b. The finalized evaluation criteria will be applied consistently and transparently by the Evaluation Committee during the review and selection of proposals.

By following this process, VIBO will develop evaluation criteria that are clear, objective, and aligned with program goals, ensuring a fair and rigorous evaluation process for non-deployment projects.

Given that the BEAD grant will not be used for infrastructure deployment, the focus will be on non-deployment activities. The following includes descriptions of the types of non-deployment initiatives that VIBO plans to fund through a competitive subgrantee process.

Internet Access Affordability: *Improve the availability and affordability of fixed and wireless broadband access, user devices and technical support for those devices.*

The BEAD grant funding will support the implementation of subsidized broadband service plans for residents and communities with limited access to affordable internet options. This initiative aims to reduce the financial barriers to broadband adoption and ensure that all residents have access to essential online services. Subsidized service plans and discount programs will be introduced to make broadband more accessible and affordable, thereby fostering digital inclusion and leveling the playing field for all residents.

To achieve this the VIBO will:

- a. Negotiate with internet service providers to establish discounted rates or subsidy programs for low-income households.
- b. Explore regulatory mechanisms to incentivize competition among ISPs and drive down prices for broadband services.
- c. Implement targeted outreach campaigns to raise awareness of existing affordability programs and encourage eligible residents to enroll.
- d. Monitor broadband pricing trends and consumer satisfaction to assess the effectiveness of cost reduction efforts.

Digital Economy Transformation: *Significantly enhance government and local business efficiency by leveraging technology to streamline processes and improve service delivery.*

Through targeted investments government efficiency and small business technology advancements, the BEAD grant will drive economic growth, foster innovation, and position the Virgin Islands as a vibrant hub for digital commerce and opportunity. The VIBO will support initiatives that, for example:

- a. Develop integrated digital service platforms that provide consumers with convenient access to end-user services and information through online user-friendly interfaces reducing the need for in-person visits and paper-based forms.
- b. Implement digital document management systems and electronic document submission to digitize and streamline paper-based processes, reducing administrative burden, and improving document accessibility and security.
- c. Embrace cloud computing technologies to modernize IT infrastructure, enhance scalability, and reduce reliance on outdated legacy systems.
- d. Implement digital citizen engagement platforms to solicit feedback, gather input, and/or facilitate two-way communication between government agencies, businesses, and the public.
- e. Strengthen cybersecurity defenses and implement robust data privacy measures to protect systems, sensitive information, and customer data from cyber threats and unauthorized access.
- f. Expansion of telemedicine services to reach underserved communities for healthcare professionals.
- g. Businesses to adopt digital technologies that enhance productivity and competitiveness.
- h. Incubator programs to support the growth of tech startups and innovative ventures.
- i. Investment in digital infrastructure for tourism and hospitality industries to enhance visitor experiences.
- j. Initiatives to promote e-commerce and online marketplaces for local goods and services.

Community Digital Competency: Develop and implement programs to promote digital literacy and digital skills and provide training and education for individuals and organizations, particularly those that are underrepresented and marginalized. To support community digital competency, BEAD funding will be allocated to various initiatives and programs aimed at enhancing digital literacy and skills development among residents such as those that:

- a. Aim to implement a lifelong learning approach to digital literacy that begins in early childhood education and continues through adult education programs and workforce training initiatives.
- b. Expand access to digital skills training programs, including coding bootcamps, vocational courses, and apprenticeships, to equip residents with the skills needed for the digital economy.
- c. Identify a need to outfit the technology needs of designated Multi-Purpose Computing Facilities (MPCFs); to include upgrades and enhancements to support the functionality of the community spaces that are used to conduct digital learning, workforce development, and digital literacy.
- d. Provide hands-on training opportunities with access to computers, tablets, and smartphones to ensure participants can practice and apply newly acquired skills in a supportive environment.

- e. Establish mobile digital literacy units equipped with laptops, tablets, and internet connectivity to bring digital literacy training directly to underserved communities, including rural areas and low-income neighborhoods.
- f. Establish dedicated digital inclusion centers equipped with computer labs, high-speed internet access, and multimedia resources to serve as hubs for digital learning and skill development.
- g. Offer free or low-cost access to computers, software, and digital resources for individuals and families who lack access at home, providing a supportive environment for self-directed learning and exploration.
- h. Recruit and train community members as technology ambassadors to serve as peer mentors and advocates for digital literacy within their neighborhoods and social networks.

Workforce Upskilling: *Enhance the skills and employability of residents through programs and resources tailored to the demands of the evolving technology-based job market.*

A significant focus of the BEAD grant will be on educational programs designed to increase digital literacy and prepare residents for workforce opportunities facilitated by broadband access. Through the BEAD grant, educational institutions can collaborate with businesses and industry partners to develop vocational training programs, online internships, and career readiness initiatives, ensuring that students graduate with the skills needed to thrive in the digital economy. The BEAD program will support those initiatives that:

- a. Offer certifications, credentials, or badges upon completion of training programs in key sectors within the local economy, such as healthcare, technology, manufacturing, or hospitality to enhance participants' marketability and demonstrate proficiency in relevant skills.
- b. Implement digital skills training programs focused on equipping individuals with the technical competencies needed for the digital economy, such as coding, data analysis, digital marketing, and cybersecurity.
- c. Offer soft skills development workshops and seminars to enhance participants' interpersonal skills, communication abilities, teamwork, problem-solving capabilities, and adaptability.
- d. Provide coaching and mentoring support to help individuals build confidence, resilience, and emotional intelligence, empowering them to succeed in diverse workplace environments.
- e. Launch entrepreneurship training programs to empower aspiring entrepreneurs with the knowledge, resources, and skills needed to start and grow their own businesses.
- f. Provide mentorship, coaching, and technical assistance to help participants develop business plans, access funding, navigate regulatory requirements, and establish sustainable ventures.
- g. Provide job placement services, career counseling, resume writing assistance, and interview preparation workshops to help participants secure employment opportunities aligned with their skills and interests.
- h. Foster partnerships with local employers, staffing agencies, and workforce development organizations to facilitate job matching, internships, apprenticeships, and on-the-job training opportunities.

These examples illustrate the diverse range of non-deployment activities that the BEAD grant could support, each aimed at addressing specific challenges and opportunities related to

broadband access and digital equity in the Virgin Islands. The VIBO's plan for the selection of non-deployment initiatives under the BEAD Program will be guided by a strategic approach to maximize impact and address the needs of residents within the jurisdiction.

Here's how the VIBO intends to address each aspect:

- a. Preference in Selecting Non-Deployment Initiatives: The Virgin Islands Broadband Office (VIBO) will employ preferences based on various criteria to select the type of non-deployment initiatives it intends to support using BEAD Program funds. These preferences may include factors such as the potential impact on underserved communities, innovative approaches to broadband access, sustainability of the initiatives, alignment with broader economic development goals, and scalability for future expansion.
- b. Addressing the Needs of Residents: Non-deployment initiatives supported by the BEAD Program funds will be designed to directly address the needs of residents within the jurisdiction of the Virgin Islands. This could involve initiatives focused on improving digital literacy and skills training, expanding access to affordable broadband services, enhancing telehealth and telemedicine capabilities, supporting remote learning and educational opportunities, facilitating e-commerce and entrepreneurship, and promoting civic engagement through digital platforms.
- c. Engagement with Localities and Stakeholders: The VIBO recognizes the importance of engaging with localities and stakeholders to ensure that the selection of eligible non-deployment activities is informed by the unique needs and priorities of communities across the Virgin Islands. This engagement may take the form of public forums, stakeholder consultations, surveys, focus groups, and collaboration with local government agencies, community organizations, educational institutions, healthcare providers, businesses, and residents. Input gathered through these engagements will help prioritize initiatives that have the greatest potential to address local challenges and bridge the digital divide.
- d. Determining Effective Use of Funds: The VIBO will continuously evaluate the effectiveness of non-deployment initiatives supported by BEAD Program funds in achieving the program's equity, access, and deployment goals. This evaluation process may involve regular performance monitoring, data analysis, stakeholder feedback, and benchmarking against established metrics and objectives. If it is determined that other uses of the funds could be more effective in achieving the program's goals, the VIBO will adjust its funding priorities and strategies accordingly, ensuring that resources are allocated in the most efficient and impactful manner to maximize the benefits for residents of the Virgin Islands.

All selected subgrantees will be required to sign a subgrantee contract that outlines the entity information, the scope of work to be completed, reporting timelines, reimbursement schedules, audit and transparency requirement and an indemnification clause. In addition, all selected subgrantees will be closely monitored by the VIBO and the Office of Management and Budget's Compliance Unit.

There will be both programmatic and financial monitoring to ensure that the subrecipients are progressing their outlined objectives based on their project timeline and within their budget. Subgrantees will also be monitored for compliance with the BEAD program goals.

Subrecipients must submit quarterly financial expenditure reports and performance (programmatic) progress reports. Programmatic progress and financial expenditure must align.

The VIBO and OMB will conduct site visits at least once every quarter with a subrecipient monitoring checklist completed for each visit. Periodic desk reviews will also be conducted. Lastly, the subgrantee will be required to submit to the VIBO its yearly audited financial statements. It will be written into the subaward that all subrecipients expending \$750,000 or more in Federal awards during the subrecipient's fiscal year must provide the required completed audited financial statements within 9 months after their year-end or one month after the issuance of their audit. Failure to comply will result in the claw back provisions being triggered.

With the successful implementation of the non-deployment activities, VIBO envisions that the people of the Virgin Islands will gain access to much needed resources. These resources will no doubt improve the lives of our vulnerable population. This population will have access to previously out-of-reach opportunities. They will be able to take advantage of digital literacy programs, telehealth, and online schooling. Access to telehealth will decrease the average waiting time to get an appointment and ultimately end up saving lives. Digital literacy programs and online schooling will assist the people of the Virgin Islands to learn new skills, have access to programs not offered locally and ultimately help create a more diverse workforce.

The US Virgin Islands Broadband Office cannot serve the people without knowing what the people want, so stakeholder input is particularly important to the overall vision. The stakeholder input began prior to the initial proposal's completion with VIBO's first workshop and will continue with the posted comment period. The VIBO team will continue to host a series of outreach and workshop engagement events in various communities across all three islands to gain insight, input, and feedback. Funding for non-deployment activities will be allocated based on the vision of the VIBO and aligned with the BEAD NOFO and the Statewide Digital Equity Plan. During the grant period, the VIBO will continuously evaluate the strategies and performance of selected subgrantees. This evaluation will coincide with community outreach and a decision will be made based on the evaluation and community input. All courses of action will align with the long-term vision of the VIBO and the BEAD NOFO.

In addition, potential subgrantees will have their applications evaluated using a standardized proposal evaluation and scoring rubric designed specifically for non-deployment activities. This scoring rubric will support the other evaluation criteria outlined above. Only projects that are deemed eligible to receive BEAD funding will be scored.

In relation to the proposed low-cost broadband service option that would be facilitated through a subgrant with eligible internet service providers (ISP), VIBO will regulate the following:

- a. Interested households would apply for the ConnectVI Community Plan through the partnering ISP's website, customer service hotline, or designated community centers.
- b. Applicants would submit proof of eligibility along with their application, which could be verified through an online portal or by submitting documents in person.

- c. The VIBO, viNGN, and the partnering ISP would collaborate on a comprehensive marketing and outreach campaign to promote the ConnectVI Community Plan to eligible households,
- d. Outreach efforts would include targeted advertisements, informational sessions at community events, and partnerships with local organizations serving low-income communities.

Subgrant Administration: The VIBO would provide a subgrant to the partnering ISP to offset the cost of providing the ConnectVI Community Plan at the subsidized rate.

The subgrant agreement would outline the terms and conditions of the partnership, including reporting requirements, compliance standards, and the disbursement schedule of funds.

Customer Support and Maintenance: The partnering ISP would be responsible for providing technical support and customer service to subscribers enrolled in the ConnectVI Community Plan.

Any necessary maintenance or repairs to the broadband infrastructure would be promptly addressed by the ISP to ensure uninterrupted service for subscribers.

Monitoring and Evaluation: The VIBO would monitor the implementation of the ConnectVI Community Plan and track key performance metrics, such as subscriber enrollment rates and customer satisfaction scores.

Regular evaluations would be conducted to assess the impact of the program on bridging the digital divide and promoting digital inclusion in the community. By offering a subsidized broadband service option like the ConnectVI Community Plan through a subgrant with an ISP, the VIBO can leverage existing infrastructure and expertise to expand access to affordable internet services for low-income households in the Virgin Islands, fostering greater digital equity and opportunity for all residents.

The proposed scoring criteria for non-deployment activities are detailed below:

Total Points: 100

Technical Merit (45 points possible)

- **Project purpose (15 points):** Reviewers will consider the extent to which potential subgrantees propose a project that aligns with one or more of the program’s objectives. Reviewers will consider how proposed projects will prioritize the needs of the community and the project outcomes of the proposed program, especially those projects that align with the goals of the Vision 2040 plan.

- **Level of need/impact in proposed service areas (15 points):** Applications will receive full points for this section if a proposed project can demonstrate specific needs in a service area that VIBO has identified as low-income and/or unserved. The locations will be identified on a service area map that will be published on the BEAD website. Prospective subgrantees will need to provide comprehensive community statistics that reflect the potential need in the community for the proposed program, including but not limited to the

estimated number of households or residents that may benefit from the program, the demographics of the impacted community (social, education, age, financial, and any covered populations as identified in the Digital Equity Act. Subgrantees will need to provide context as to how and why they selected their proposed project area.

- **Project feasibility (15 points):** Potential subgrantees will be scored on the comprehensiveness and appropriateness of the project, including the clarity and level of detail of the proposed project plan. Reviewers will assess the extent to which proposed programs stimulate the adoption of broadband for telehealth, distance learning, telework and entrepreneurship, economic growth, and job creation. Reviewers will also consider the reasonableness of the program timeline and the likeliness of program success.

Qualifications and Expertise (20 points possible)

- **Technical and operational capability (10 points):** Potential subgrantees will need to, at minimum, demonstrate capability of operating the proposed program with appropriately skilled staffing with high technical understanding of proposed digital literacy activities.
- **Financial and managerial capacity (10 points):** Potential subgrantees will need to show proof of financial good standing and must demonstrate a substantial workforce able to fulfill the needs of the proposed program in a timely manner.

Local Coordination (10 points possible)

- **Proof of community engagement in proposed service area (5 points):** Potential subgrantees will need to provide record that they engaged the community for which they are submitting a proposal to serve, documenting that they considered the needs of the community when developing their proposal. Potential subgrantees who do not provide proof of engagement will receive no points in the category.
- **Letter(s) of support (5 points):** Potential subgrantees are requested to submit at least one letter of support from collaborating organizations (e.g., CAI where proposed services will be implemented). All collaborating organizations are encouraged to submit a letter of support in the application package submitted by the potential subgrantee for full points. Potential subgrantees who do not submit any letter(s) of support will receive no points in this category.

Project Budget (15 points possible)

- **Reasonableness of the budget (10 points):** When assessing points for reasonableness of the budget, there shall be a maximum number of points awarded to the lowest priced bidder. The points allocated to higher-priced bidders should be equal to the lowest bidder's price multiplied by the maximum points available for price, divided by the higher proposal price. In instances where projects are vastly different in scope, points will be awarded to potential subgrantees that address the needs of impacted community and/or service areas.
- **Match requirement (5 points):** Although not required, applicants will receive points in this category based on the amount of match they will contribute. Applicants who do not propose a match will receive no points in this category but will not be disqualified from consideration.

Other (10 points possible) - The VIBO will assess an additional 10 points to projects that are similar in scope to determine which will be funded to avoid duplicative initiatives.

- **Minority Business Enterprise, Woman Business Enterprise, or Labor Surplus Area Firm (5 points):** Full points will be awarded to any potential subgrantee meeting one of these designations.
- **Sustainability of the project after the end of funding term (5 points):** Potential subgrantees will need to provide a project sustainability plan after the end of the BEAD funding term (June 2028). Points will be awarded based on a succinct plan for project continuity passed 2028, and how the funded program will be maintained financially and operationally.

In the event the review team identifies two or more competing proposals with the same or similar project scopes, five additional points will be awarded to the applicant that demonstrates how the project will adopt environmentally friendly approaches like energy efficient technology and practices and utilization of renewable energy sources wherever possible. Should no such criteria apply, the reasonableness of the budget criteria identified above will be utilized in scoring as the determining factor.

Reviewers will score all submitted proposals that make it through the initial vetting phase and risk assessment using the scoring template above. The VIBO will select the potential subgrantees who average the highest score and do not overlap project locations. The broadband office will approve and fund proposals from the highest score on down until all available funds are expended. Safeguards will be implemented to ensure diversity and inclusion of all goals and communities/geographic regions of the territory benefit.

The US Virgin Islands Broadband Office will negotiate a mutually acceptable Grant Agreement within 21 calendar days. If this cannot be accomplished within 21 calendar days after initial Selection, the VIBO reserves the right to terminate contract negotiations with the first-ranked potential subgrantee and may select the second-ranked subgrantee for negotiation of a potential award. This process may continue in order of Offeror ranking until a mutually acceptable Agreement is achieved with the VIBO and an award is made to a selected Offeror. This process will aid in the defense against any possible allegations relating to the fair and competitively neutral manner in which the review process should be undertaken.

SECTION 6 Eligible Entity Implementation Activities

(Requirement 10)

The USVI Broadband Office does not anticipate directly implementing projects or activities, as a recipient, in advancement of the outlined objectives under the BEAD program. However, the VIBO will reserve the option to include a non-deployment activity in accordance with NTIA's eligible use of funding guidance, with itself as a recipient, should it become clear that a suitable subgrantee cannot be identified, or subgrantee award for an identified activity is not practical to achieve.

SECTION 7 Labor Standards and Protection *(Requirement 11)*

Per the above-mentioned requirements, the selected grantees will be required to clearly indicate and support how it will support and enact the labor standards and protections listed.

The VIBO will require the following from its subgrantees:

- The subgrantee's record of past compliance with federal labor and employment laws, specifically regarding broadband development projects in the last three years. The VIBO will collect data on the prospective subgrantee's historical use of contracting and subcontracting arrangements, including staffing plans, and at least one example of each contractor and subcontractor's past performance in the context of a similar project;
- A certification from an Officer/Director-level employee (or equivalent) of the prospective subgrantee evidencing consistent past compliance with federal labor and employment laws by the prospective subgrantee, as well as all contractors and subcontractors; and
- Written confirmation that the prospective subgrantee discloses any instances in which it or its contractors have been found to have violated laws such as the Occupational Safety and Health Act, the Fair Labor Standards Act, or any other applicable labor and employment laws for the preceding three years.

Furthermore, in the application process, the VIBO shall require that subgrantees declare and explain the following:

- How subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
 - Provide information on applicable wage scales and wage and overtime payment practices for each class of employees expected to be involved directly in the physical construction of the broadband network; and
- How the subgrantee will ensure the implementation of workplace safety committees that are authorized to raise health and safety concerns in connection with the delivery of deployment projects.

The VIBO will review the responses from the prospective subgrantees and those who have a record of adhering to fair labor practices and staying in compliance with federal labor and employment laws will earn higher points. Subgrantees will receive 15 points for always adhering to fair labor practices, 10 points for frequently adhering to fair labor practices, 5 points for adhering to fair labor practices sometimes and 0 points for never adhering to fair labor practices.

The following are requirements that subgrantees, contractors and sub-contractors will have to follow:

- Use a directly employed workforce, as opposed to a subcontracted workforce;
- Pay prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable, and collecting the required certified payrolls;
- Use project labor agreements (i.e., pre-hire collective bargaining agreements between unions and contractors that govern terms and conditions of employment for all

workers on a construction project);

- Use of local hire provisions;
- Commitments to union neutrality;
- Use labor peace agreements;
- Use an appropriately skilled workforce (e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers, particularly those underrepresented or historically excluded);
- Use an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and
- Take steps to prevent the misclassification of workers.

The VIBO will, in accordance with the BEAD NOFO, allow prospective subgrantees without a record of labor and employment law compliance to submit a specific statement committing to using strong labor and employment standards and protections. All agreements executed will detail the labor standards and protections including any additional provisions the subgrantee must agree to receive grant funding for the conduit system, including the listed requirements above. The VIBO will also include this language in its subgrantee agreements, which is also in compliance with Davis-Bacon and Service Contract Act Requirements.

The subrecipient compliance and reporting guide, which includes the various requirements related to labor standards and protections from the BEAD NOFO, will be provided to the subgrantees to support the efforts to ensure subgrantees comply. The VIBO will also publish this subgrantee reporting and compliance guide on its website related to the implementation of its BEAD programs. The VIBO will establish and maintain open communication with subgrantees including providing post-award guidance to support the successful implementation of the required labor standards and protections.

As part of the regular reporting process, the VIBO will make sure the focus on compliance with the labor standards and protections is a priority. Subgrantees will submit their completed labor reporting form with every grant disbursement request or quarterly report, whichever one is submitted first. After that point, the VIBO will establish regular reporting times for subgrantees to submit their form. If a subgrantee does not utilize union labor or pay at or above the prevailing wage, the wages paid to staff must be reported on this form.

Included in VIBO 's post-award guidance is the reporting requirement information for the selected subgrantee. The report is where the subgrantee may provide a certification that all laborers and mechanics employed by contractors in the performance of the conduit project are paid wages at rates not less than those prevailing, as determined by the U.S. Secretary of Labor in accordance with subchapter IV of chapter 31 of title 40, United States Code (commonly known as the "Davis-Bacon Act"), for the corresponding classes of laborers and mechanics employed.

If such certification is not provided, the subgrantee must provide a Project Employment and Local Impact report detailing:

- The number of employees of contractors and sub-contractors working on the project;
- The number of employees on the project hired directly and hired through a third party;
- The wages and benefits of workers on the project by classification; and

- Whether those wages are at rates less than those prevailing. (As determined by US Secretary of Labor in accordance with subchapter IV of chapter 31 of Title 40, United States Code (“Davis-Bacon Act”).

As part of the post-award guidance, VIBO will emphasize to the subgrantee that it must maintain sufficient records to substantiate the above information upon request.

In addition, the subgrantee must provide a certification that a project includes a project labor agreement or a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)).

If the subgrantee does not provide such a certification, the subgrantee must provide a project workforce continuity plan, detailing:

- How the recipient will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality construction throughout the life of the project, including a description of any required professional certifications and/or in-house training;
 - How the recipient will minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the project;
 - How the recipient will provide a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities, including descriptions of safety training, certification, and/or licensure requirements for all relevant workers (e.g., OSHA 10, OSHA 30);
 - Whether workers on the project will receive wages and benefits that will secure an appropriately skilled yes in the context of the local or regional labor market; and
 - Whether the project has completed a project labor agreement.

Finally, the subgrantee will report on the project’s prioritization of local hires and whether the project has a Community Benefit Agreement, with a description of such an agreement.

Once the above detailed information is provided, the subgrantee must proceed to review, complete, and sign the certification box and signature section at the conclusion of their labor report certifying and acknowledging the accuracy and completeness of the information provided.

SECTION 8 Workforce Readiness *(Requirement 12)*

The VIBO is committed to ensuring that the island has the skilled workforce it needs to implement this once in a lifetime opportunity to get internet access to our communities. Across the nation, there is a shortage of trained fiber-optic installers and front-line electrical workers, as well as network and cybersecurity professionals. The Virgin Islands has not been immune to these shortages and the situation has been compounded by the “brain drain” or mass exodus of our skilled workers due to the hurricanes, the excessive cost of living with lower salaries compared to the mainland and the housing shortage. There is no singular solution to the labor shortage, but the Territory has already started to address these challenges by cross training, upskilling, and creating awareness about the careers that are available in this field.

The VIBO will work as a connecting agent between the workforce, training opportunities and employers. The VIBO will work with the local American Job Center, Department of Labor, Department of Education and Workforce Development Board to make sure a pipeline is created to support the skilled workforce that is necessary to implement this project. The VIBO will also collaborate with the RT Park, Economic Development Authority, and other agencies to pro-actively bring back local talent and attract new talent by targeted marketing and media campaigns that will encourage entrepreneurship and highlight the career opportunities that this program will be creating. In addition to making sure that subgrantees follow the BEAD requirements concerning high labor standards and protections, the VIBO will also encourage to subgrantees to provide a safe working environment that has definitive pathways for career advancement and skill building.

Throughout the BEAD program implementation, the VIBO and VI Department of Labor will continue to coordinate and partner with workforce stakeholders to ensure that the local broadband workforce is prepared to meet the needs of employers. Engaging in partnerships and collaboratively developing training programs will be a responsibility of the selected BEAD deployment subgrantee, as defined in the subgrantee contract. The US Virgin Islands Broadband Office (VIBO) continues to engage in opportunities for partnerships with industry associations. These partnerships will allow stakeholders to grow capacity at local training schools to offer non-degree specialized courses. Through sector-based partnerships, the VIBO will continue support efforts to sustain the workforce needed. Regular communication with partners will ensure that all stakeholders work toward the same goal and efficiently leverage available resources and programs.

The VIBO is committed to supporting a diverse workforce through equitable on-ramps into high-quality broadband-related jobs. Through continued engagement with labor organizations, community-based organizations, the University of the Virgin Islands, and others, the VIBO will ensure that workers' voices continue to inform the planning and implementation process. The efforts described above will strengthen the VIBO's relationships with employers and training providers to best serve the interests of all Virgin Islanders.

To further cement equity in its processes, the VIBO will ensure that the BEAD program subgrantees will:

- Maintain job quality for new and incumbent workers engaged in the sector through addressing: Living wage Benefits Career building, and Wealth building.
- Ensure fair workplaces: Engage with labor organizations and community-based organizations to maintain worker voice and;
- Ensure programs and training opportunities are timely, accessible, and meet employers' needs.

The VIBO recognizes the value of diversity in the workforce and is committed to initiatives that work toward this goal. As outlined in the Digital Equity Plan, the VIBO has already begun this work by consulting with various stakeholders and spearheading discussions surrounding equitable workforce strategies through recent workshops. To increase awareness of broadband industry careers, the VIBO will use BEAD funds to emphasize the benefits of broadband jobs to target populations through marketing campaigns and partnerships with corporations, government agencies, schools, and other relevant organizations to reduce outmigration and "brain drain."

The VIBO plans to consider the following initiatives to attract a diversity of workers to the industry:

- Definition and segmentation of audience to inform marketing strategy;
- Design marketing strategy to promote awareness of on-ramps and recruit more potential students to non-degree programs;
- Targeted outreach to recruit underrepresented populations for available positions;
- Define learning experience required for degree and non-degree positions and RFP requirements;
- Identify key partners that support underrepresented communities;
- Define matching process and apprenticeship model in alignment with feedback from target employers; and/or
- Identify the most impactful wrap-around services to drive enrollment and retention (ex: career center that offers advisement, interview training, and wardrobe assistance).

The VIBO will also explore the following diversity, equity, and inclusion initiatives for Puerto Ricans to enter and be successful in non-degree programs and improving and/or adding these offerings for students in degree programs:

- Providing career-centers staffed with advisors specializing in non-degree and broadband job-seeking student needs, particularly staff that will help connect members of underrepresented populations with additional resources they find helpful when searching for a job;
- Encouraging partnering organizations to establish pipelines for diversity recruitment programs;
- Establishing affinity group programs for underrepresented groups to create pathways for additional mentorship, support, and career advancement;
- Utilizing local expertise to build equity-informed curricula for all educational programs;
- Providing accommodations and support for non-degree program students with disabilities;
- Partnering with an external organization to provide financial literacy workshops to students;
- Creating pathways for feedback that will help PRBP and its partners continue to iterate and improve upon its procedures; and/or
- Allocating monetary resources to provide scholarships and/or other financial support for students from lower socioeconomic backgrounds.
- Facilitating increased remote education and work opportunities, particularly for those living in rural areas;
- Welcoming feedback from local advocacy groups, union representatives, and other entities committed to advancing diversity and equity in workplace initiatives; and/or
- Expanding the reach of social service offerings, such as childcare, public transportation, and mentorship.

The VIBO commits to continue iterating based on community feedback to ensure that its programs are best serving members of underrepresented groups. The VIBO will facilitate connections with relevant subgrantee entities engaging with diversity, equity, and inclusion work to cultivate synergies across workstreams.

SECTION 9 Minority Business Enterprises (MBEs and Women's Business Enterprises (WBEs) / Labor Surplus Area Firms Inclusion

(Requirement 13)

The US Virgin Islands Broadband Office will use a comprehensive and collaborative approach to support diversity, equity, and inclusion in all aspects of the BEAD program. Promoting these values is a socially responsible approach and can bring additional benefits to the subgrantees including the opportunity to recruit new talent, enhance innovation and have access to a broader pool of talent.

The VIBO will partner with the Workforce Development Board (eligible providers), Chamber of Commerce, Small Business Development Center, Women In Business (VI and Caribbean Chapter), UVI CELL, RT Park and the Virgin Islands EDA to ensure that MBEs, WBEs and Labor Surplus Area Firms are made aware of the opportunities to engage with the VIBO and support the program. The VIBO will have informational sessions with these groups so that they know specifically where the gaps are and how their members can offer their services to the program. In addition, VIBO will engage in an informational campaign using social media, print ads and radio to advise the public of the opportunities available, emphasizing the importance of participation from MBEs, WBEs and Labor Surplus Area Firms.

Lastly, the VIBO will regularly monitor and report out on diversity efforts, including the number of grants awarded to minority, women-owned, and labor surplus area firms. Due to the Connect USVI award rules that consider contractor projects to be duplicative there are no further responses regarding inclusion of MBEs, WBEs, and Labor Surplus Area Firms for this section as the requirements speak to contractor solicitations for deployment projects. VIBO certifies that it will take all necessary affirmative steps to ensure minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including the guidance outlined on pages 88 - 89 of the BEAD NOFO.

SECTION 10 Cost and Barrier Reduction

(Requirement 14)

Through NTIA grants, 244 miles of fiber optic cable were installed, rights to 3,720 miles of undersea cable were acquired between Florida and Puerto Rico, and 325 CAIs were connected to reliable high-speed internet services. Installation of the fiber optic cable created a core-ring fiber-optic system in underground conduits on the islands of St. Thomas, St. John, and St. Croix with aerial service to outlying areas such as Water Island.

Although broadband infrastructure continues to be made available to any qualified ISP in the Territory, BEAD funding is prohibited from being utilized for any network expansion. This is due to the Connect USVI award rules that consider such projects to be duplicative and, thus, are barred with the use of BEAD funds. Consequently, there are no further responses regarding broadband infrastructure deployment cost and barrier reduction for this section.

SECTION 11 Climate Assessment

(Requirement 15)

Since BEAD funds cannot be used for broadband infrastructure development projects in the Territory, because of the Connect USVI award's duplication rule, this section is not applicable to the USVI's BEAD plan. However, in considering the VIBO intentions to achieve Governor Bryan's objectives of ubiquitous "Internet for All" throughout the Islands, the Territory references the Virgin Islands Territorial Emergency Management Agency's (VITEMA) Hazard Mitigation and Resilience Plan for the Virgin Islands (HMRP).²

SECTION 12 Low-Cost Broadband Service Option

(Requirement 16)

The use of BEAD funding for deployment purposes would be considered duplicative, due to the award of the Connect USVI grant from the Federal Communications Commission (FCC). Therefore, the US Virgin Islands Broadband Office will not utilize BEAD funds for deployment projects within the territory.

SECTION 13 Middle Class Affordability Plans

(Requirement 20)

Designing affordable broadband service does not just relate to monthly fees but also the cost to initiate service and maintain ongoing costs for service and/or device upgrades to keep up with consumer needs. To ensure high-quality broadband services are accessible to all middle-class families within the BEAD-funded network's service area at reasonable prices, a multifaceted approach will be employed:

Public-Private Partnerships (PPPs): Collaboration between VIBO and private internet service providers (ISPs) through PPPs will facilitate the expansion of broadband accessibility to those families that do not meet established thresholds for existing government assistance programs. VIBO will incentivize ISPs to expand their networks into underserved areas by offering continued partnerships and high-priority consideration for those that reach a wider audience. This partnership ensures that middle-class families have access to a variety of broadband options at affordable rates as well. The VIBO intends for providers using BEAD funds to keep their commitment to ensure middle-class affordability over the life of the network.

Competition Promotion: Encouraging competition among ISPs fosters innovation and drives down prices. VIBO, through the Territory's leadership will consider establishing policies that promote market competition, such as reducing regulatory barriers for new entrants or implementing measures to prevent monopolistic behavior. Increased competition leads to better service offerings and lower prices for middle-class families.

Regulatory Measures: Implementing regulations that ensure fair pricing and quality standards for broadband services can protect consumers. VIBO will encourage net neutrality regulations to prevent ISPs from discriminating against certain types of internet traffic. Additionally, regulators, like the PSC, will continue to monitor ISPs to ensure they comply with pricing transparency requirements, preventing hidden fees and price gouging.

Digital Inclusion Initiatives: Investing in digital literacy programs and providing access to affordable devices can increase broadband adoption among middle-class families. By educating consumers on the benefits of internet access and providing resources to overcome barriers to adoption, more families can take advantage of high-quality broadband services. VIBO will work closely with the territory's DE partners to effectuate digital inclusion across the income levels.

Long-Term Planning: BEAD-funded initiatives will prioritize long-term sustainability to ensure continued access to high-quality broadband services. This includes regular maintenance of infrastructure, technology upgrades, and future-proofing networks to accommodate increasing demand. By investing in sustainable solutions, VIBO will ensure that middle-class families have access to reliable broadband services at reasonable prices for years to come.

By implementing these strategies in conjunction with BEAD funding, high-quality broadband services can be made available to all middle-class families in the network's service area at reasonable prices. This not only promotes economic growth and competitiveness but also enhances social inclusion and equity in access to essential digital services.

SECTION 14 Use of 20 Percent of Funding

(Requirement 17)

The US Virgin Islands Broadband Office is slated to receive a \$27,103,240.86 allocation for the implementation of the territory's BEAD program. Per the recommendation of the Director of the Office of Management and Budget, VIBO is requesting 100% of its remaining allocation.

To ensure that all spending follows the BEAD NOFO, VIBO does not intend to use any of the BEAD funding until our final proposal has been approved by NTIA. As such, VIBO requests \$25,853,288.86 upon approval of this Initial Proposal, which is 100% of the USVI's BEAD allocation minus \$1,249,952 in initial planning funds that were already received.

The current needs of the Territory, makes the case for the Virgin Islands to properly invest in non-deployment activities that not only advance our human capital but provide a platform for residents to capitalize on new opportunities that may be beneficial to them (e.g., distance learning, trade certifications, telehealth, etc.)

Through the five years of implementation, this 100% allocation will be used towards the following areas:

- Non-deployment costs, such as outfitting community digital hubs at qualifying CAIs
- Programmatic expenses, including the procurement of NTIA BEAD-compliant challenge process portal and outreach initiatives;
- Administrative costs, including BEAD-centric staffing for the broadband office

These activities are outlined as follows:

Project Administration

The USVI Broadband Office will onboard qualified personnel to ensure the program achieves the BEAD award's goals. This includes monitoring progress to ensure that the goals are met on time and conducting project evaluations.

Grant Management and Compliance Monitoring

The USVI Broadband Office will hire a Grants Administrator as well as other personnel to develop program procedures and conduct reporting. The Grant Administrator and OMB's Compliance Unit will also conduct monitoring and compliance activities to ensure that funds are used in compliance with 2CFR uniform guidance and GVI policies.

Implementation of the sub-grantee selection process

The USVI Broadband Office will provide oversight throughout the subgrantee selection process. This includes the development of scoring guides, providing technical assistance through workshops. The USVI Broadband Office will also conduct technical reviews of subgrantee applications and lead the sub-grantee selection process. Members of the review board will be compensated by BEAD funds for their participation in the BEAD program per each assessment and scoring meeting they attend.

Coordination of Outreach and Stakeholder engagement

The USVI Broadband Office will engage and inform the community of the various broadband initiatives through community information sessions. Additionally, the USVI Broadband Office/Office of Management & Budget will continue to build and nurture relationships with GVI stakeholders and local non-profit organizations. This will include community visits and assessments to better understand nuances in planning and executing programs in different local communities and formulating relationships with relevant points of contact. The USVI Broadband Office will also establish communications channels to allow for easy communication with relevant stakeholders in an organized and efficient manner. This would streamline the dissemination of relevant information, track program progress, collect data, and evaluate roadblocks.

The Office of Management and Budget's Federal Grants Management Unit is actively developing a detailed program budget to match the non-deployment projects identified in this proposal. The VIBO certifies that it will adhere to BEAD Program requirements regarding Initial Proposal funds usage.

SECTION 15 Eligible Entity Regulatory Approach *(Requirement 18)*

There are no laws in the US Virgin Islands concerning broadband, utility services, or similar subjects, whether they predate or postdate enactment of the Infrastructure Act that either:

- preclude certain public sector providers from participation in the subgrant competition, or
- impose specific requirements on public sector entities, such as limitations on the sources of financing, the required imputation of costs not actually incurred by the public sector entity, or restrictions on the service a public sector entity can offer.

As such, VIBO will not need to waive any laws to implement the BEAD program.

SECTION 16 Certification of Compliance with BEAD Requirements *(Requirement 19)*

The VIBO certifies that it intends to comply with all applicable requirements of the BEAD program, including the reporting requirements.

The VIBO will align with BEAD NOFO to ensure facilitation of subgrantee accountability procedures by employing the following practices:

- Distribution of funding to subgrantees on a reimbursable basis (which would allow the VIBO to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize);
 - Upon award of the contract between the VIBO and the subgrantee, grant funds will be distributed on a reimbursement basis. Subgrantees are authorized to begin work that will be funded with grant funds.
- The inclusion of existing claw back provisions in subaward agreements between the VIBO and any subgrantee;
- Timely subgrantee reporting mandates; and
- Robust subgrantee monitoring practices.

The VIBO will proactively monitor subgrantees throughout the duration of their projects to ensure compliance with all BEAD Program requirements, through existing practices of site visits, desk reviews and submission of monthly financial and progress reports. In addition, the VIBO will impose sufficient recourse using existing OMB policies and procedures for claw back provisions will be implemented against subgrantees that do not fulfill their legal and contractual obligations, by enforcing the Termination and Suspension clause written in all grant awards.

To maintain eligibility for grant funds, subgrantees will be monitored through the following activities:

Reporting

The subgrantee shall provide a monthly accounting for the funds expended from this award. This includes, but is not limited to, receipts, invoices, and contracts executed to secure services related to these expenditures. The subgrantee will also be required to provide monthly progress reports to include details of work completed, work in progress with picture and statistics if necessary. Failure to provide the required reports will result in restrictions in the recipient's reimbursements.

Site Visits

Site visits to project areas will occur twice a year, around six months apart. These regular visits will be to document implementation and progression of BEAD projects. In the event of slower project progression, additional site visits may be required to assess the project closely and determine whether funds may need to be recouped, should a subgrantee fail to fulfill contractual obligations on their proposed timeline to service.

Desk Reviews

The VIBO and the OMB Compliance Unit will conduct desk reviews at random as per existing OMB guidelines for site visits. Funding recipients through VIBO will be selected for desk reviews as part of our obligation and responsibility for compliance monitoring and oversight of the receipt, disbursement, and use of BEAD funds. The desk review's objective will be to evaluate the documentation supporting the use of the BEAD funds as reported to VIBO. The desk review will also assess the risk of unallowable use of funds. The scope of the review will include the obligation and expenditure data for the selected period.

As part of the desk review, we will interview key personnel responsible for preparing and certifying the report, those personnel responsible for obligating and expending BEAD funds. We will evaluate contracts and other documents and records used to support the submitted reports. Among other things, we will evaluate the results of single audits and those issued by the Government Accountability Office. The conclusion reached from our desk review may result in a site visit for more in-depth review or an audit.

The US Virgin Islands Broadband Office certifies that its selection of subgrantees will account for and satisfy each of the following authorities:

- Parts II and III of Executive Order 11246, Equal Employment Opportunity
- Executive Order 13166, Improving Access to Services for Persons with Limited English Proficiency
- Executive Order 13798, Promoting Free Speech and Religious Liberty
- 2 CFR PART 200—UNIFORM ADMINISTRATIVE REQUIREMENTS, COST PRINCIPLES, AND AUDIT REQUIREMENTS FOR FEDERAL AWARDS

Additionally, prior to distributing any BEAD funding to a subgrantee, the VIBO requires the subgrantee to agree, by contract or other binding commitment, to abide by the non-discrimination requirements set forth in the following legal authorities, to the extent applicable, and to acknowledge that failure to do so may result in cancellation of any award and/or recoupment of funds already disbursed:

- Title VI of the Civil Rights Act
- Title IX of the Education Amendments of 1972
- The Americans with Disabilities Act of 1990
- Section 504 of the Rehabilitation Act of 1973
- The Age Discrimination Act of 1975
- Any other applicable non-discrimination law(s)

No person shall be excluded from participating in, be denied the proceeds of or be subject to discrimination in the performance of the award on account of race, creed, color, sex, religion, disability, or national origin.

The VIBO will require all subgrantees to certify their compliance with cybersecurity and supply chain risk management requirements per the guidelines listed below:

Cybersecurity

1. The prospective subgrantee has a cybersecurity risk management plan (the plan) in place that is either:
 - operational, if the prospective subgrantee is providing service prior to the award of the grant; or
 - ready to be operationalized upon providing service, if the prospective subgrantee is not yet providing service prior to the grant award;
2. The plan reflects the latest version of the National Institute of Standards and Technology (NIST) Framework for Improving Critical Infrastructure Cybersecurity (currently Version 1.1) and the standards and controls set forth in Executive Order 14028 and specifies the security and privacy controls being implemented;
3. The plan will be reevaluated and updated on a periodic basis and as events warrant; and
4. The plan will be submitted to VIBO prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, an updated version must be submitted to VIBO within 30 days.

Supply Chain Risk Management (SCRM)

1. The prospective subgrantee has a SCRM plan in place that is either:
 - operational, if the prospective subgrantee is already providing service at the time of the grant; or
 - ready to be operationalized, if the prospective subgrantee is not yet providing service at the time of grant award;
2. The plan is based upon the key practices discussed in the NIST publication NISTIR 8276, Key Practices in Cyber Supply Chain Risk Management: Observations from Industry and related SCRM guidance from NIST, including NIST 800-161, Cybersecurity Supply Chain Risk Management Practices for Systems and Organizations and specifies the supply chain risk management controls being implemented;
3. The plan will be reevaluated and updated on a periodic basis and as events warrant; and
4. The plan will be submitted to VIBO prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, an updated version must be submitted to VIBO within 30 days. The VIBO will provide a subgrantee's plan to NTIA upon NTIA's request.

In closing, this proposal and identified plans therein, underscore the Virgin Islands executive leadership team's commitment to not just delivering immediate improvements in internet connectivity but also ensuring that these benefits are sustainable and adaptable to future needs. This strategic approach will solidify the foundation for a digitally advanced and connected US Virgin Islands for generations to come.