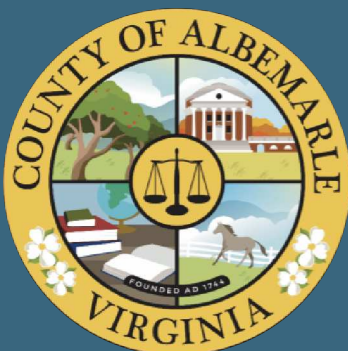# Affordable Connectivity Program (ACP) Bridge

Making broadband affordable in our community

Prepared by

The Broadband Accessibility and Affordability Office of Albemarle County

This white paper ultimately represents the story of how our newly formed office found an efficient and effective way to address the digital divide in our community through the development of a novel local benefit program, as told by our associate Augusta Groeschel-Johnson. We accomplished all this by first and foremost listening to the advice of others, whether it was Department of Social Services case workers, our Procurement officers, or the Maryland team that developed its statewide benefit and whose input helped us click the final pieces into place.

Building our program as a supplement to the Affordable Connectivity Program (ACP) allowed us to minimize administrative overhead and fraud risk, while providing these funds to community members with a demonstrated need. Developing our program with the input of so many partners will allow us to chart new paths, ones we had already mapped out before ACP fell in our lap.

There is no doubt that ACP has been the most successful program to date address the digital divide. Helping to connect over 23 million households nationwide, and 2,500 in Albemarle County has meant the world to so many. As the ACP program winds down, we've looked forward to consider how best to continue supporting households in our community:

- *There are countless lessons to be learned from the ACP roll-out, implementation, and wind-down. Those lessons should be taken into account and any future efforts to address broadband affordability should be more targeted and more direct.*
- *USAC's role in gluing together so many data sources into a single, integrated verification process is a major factor in this program's success should be built upon. The ACP program was a valuable resource for us to leverage local funds with a federally funded program to provide extended benefits to families. We will actively pursue any similar means of leveraging federal programs to provide eligibility verification for future broadband benefit programs.*

Providing this benefit to our community remains a priority for our office and for Albemarle County. As we prepare for the wind-down we will work to share our efforts to extend ACP Bridge beyond the end of ACP. We remain thankful for our stakeholders and for the support of our Board of Supervisors and colleagues.

Jason Inofuentes

Program Manager
Broadband Accessibility & Affordability Office of Albemarle County

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ACP Bridge:
Covering Gaps in Affordability

Affordable universal broadband has become a crucial component of the individual's right to health, education, and economic opportunity today. Full participation in modern society includes online-learning, remote employment opportunities, virtual civic meetings, telemedicine, e-commerce, and many more services accessed through the internet. In 2020, the COVID-19 pandemic made this critical need more observable than ever as it rapidly drove work and school into a remote format.

Mike Culp and Jason Inofuentes, Director and Program Manager respectively of the Broadband Accessibility & Affordability Office (BAAO), work to ensure all community members in Albemarle County have access to adequate and affordable broadband service. Affordable broadband should only cost the resident 2% or less of their monthly income (Alliance for Affordable Internet). Albemarle County's ACP Bridge program supplements the $30 broadband subsidies available through the federal Affordable Connectivity Program (ACP) with an additional $20 per month (BAAO). As the federal ACP comes to an end, this paper looks at the components of the Bridge model which can continue to address internet affordability in Albemarle County. While Albemarle County is on course to have universal internet access by 2025, programs like ACP Bridge are needed to make service affordable.

Affordability is an Obstacle to Access in Virginia

- 75% of Virginians subscribe to broadband services
- 200k K-12 students & 60k college students without broadband
- 20% of rural students lack broadband access
- 441,435 homes underserved

Ali 2022

Impact of Internet Connection on Families

3.1% higher home value

Better school work

Higher community GDP

Less unemployment

Hampton et al. 2021, Sanchez 2021

Our Goals

Short-term: Increase enrollment in ACP and ACP Bridge

Long-term: Ensure community members have access to adequate and affordable broadband service.

BAAO 2024

Developing the Program Model

The ACP Bridge program was developed and implemented through partnership between different county government departments and broadband service providers while incorporating community stakeholder feedback. The key components of this process were compiled through interviews with contributing employees from the Broadband Accessibility and Affordability Office (BAAO), the County Executive's Office, the Department of Social Services (DSS), the County Attorney's Office, Department of Finance & Budget, and the Office of Grants & Agreements (See page 13). Ultimately, other organizations should consider how to adapt the roles described below for their staffing and stakeholders.

**A Team Effort with Internal and External Partners**

The budget for the ACP Bridge project was developed by BAAO along with the Department of Finance & Budget, then approved by the Board of Supervisors. The method of procurement had to be determined, which involved critical feedback from DSS. The memo of agreement (MOA) was written by the county attorney and signed by the County Executive, the county attorney, the director of BAAO, a chief financial officer, and the legal authority for each partnering internet service provider (ISP).

Method of Procurement

Determining a method of procurement is an essential step in planning a broadband affordability program (Humphrey, 2023). Most affordability programs can generally be categorized as a consumer subsidy program, a public benefit program, or a public procurement program, which determines the funding source and distribution method (Humphrey, 2023). The ACP Bridge program is funded by Albemarle County using locally sourced general appropriations. This categorizes ACP Bridge as a grant program, since it is a set amount of funding to put towards broadband equity in the county.

Locating Need

The first year of ACP Bridge development focused on defining the county areas that the grant should prioritize first. A good first step is to identify neighborhoods and demographics that more likely to have issues of affordability. Since cost of service is a larger burden for lower-income households, areas with lowest average annual income are emphasized. Households that have a higher broadband cost burden are the focus, particularly in areas where service is available but many are underserved (BEAD Program).
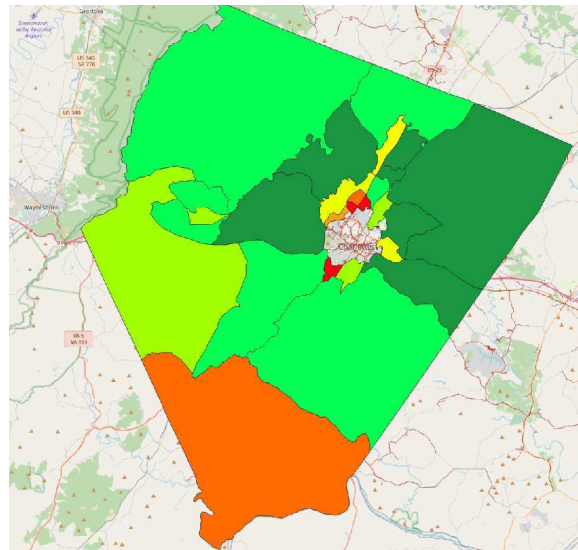
Analysis by BAAO of ability to afford broadband by census tract in Albemarle County (red least able to afford, green most able to afford).

Effective Grant Distribution

The initial program model was based on the Virginia Energy Assistance Program (EAP) which provides fuel, utility, and cooling assistance to eligible households (VA Dept. of Social Services, 2024). In that model the participating individual has to apply for direct support from the government and present their paid utility bill for heating and gas to verify the money was specifically used for the utilities charge. While procurement appraised the legal ability to use funds for a social benefit program, DSS showed their essential role early on by criticizing this particular model. The benefit could count towards taxable household income if given directly to individuals which may in turn change their eligibility status.

ACP Bridge now works as a grant which reimburses service providers to reduce rates for eligible recipients via statement credits. Representatives from BAAO and the County Attorney's Office negotiated with service providers on the stipulations of the exchange. The memorandum of agreement (MOA) was drawn up by the county attorney and informed by the Office of Grants and Agreements to meet the parameters of a grant-based model. The agreement outlines the affordability landmarks that must be met by partnering ISP's receiving monetary support from the grant.

Reimbursement Recipient	Pro	Con
Enrolled Individual/ Household	• No middle entity/ more direct	• Requires proof of service payment • Counts as taxable income for enrollee (may impact eligibility)
Internet Service Provider (ISP)	• Monthly credits given to enrollee by ISP • Not taxable to recipient • Enables auto-enrollment for ACP enrollees	• Requires verifying statement credits

Enrollment Process

Making enrollment a simple process for residents was a guiding principle based on interviews with internal and external stakeholders. Enrollment has become easier since the beginning of the program, transitioning into an auto-enrollment system through service providers.

Individuals must already be receiving the federal ACP benefit to qualify for ACP Bridge. The auto-enrollment model reduces the administrative burden of the process because the applicant has already qualified for the federal ACP which enables the provider to enroll Albemarle residents in the local program. In the case of the federal program ending, bringing the same verification standards despite losing federal oversight can help keep providers comfortable with the transition.

Promoting the federal ACP is as important as promoting ACP Bridge within the county. Community members struggling with broadband affordability without help should first be directed to the ACP application (getinnternet.gov). An applicant is eligible for ACP when; A.) Their household has an income below 200% of the federal poverty line, B.) Any household member uses a qualifying federal government assistance program including SNAP, Medicaid, WIC, Lifeline, and more, or C.) The household includes a student eligible for free or reduced-price meals (getacp.org).

While ACP Bridge enrollment has been automated, the federal ACP still requires completing an e-application. In order to promote internet affordability through these programs, digital navigators have been incorporated to facilitate through outreach.

Digital Navigator Pilot Program

Digital navigators can direct community members to affordability resources, help them determine their eligibility, and provide assistance in the application process. The incorporation of a digital navigator program is a crucial step in expanding ACP Bridge coverage in the county.

The digital navigator pilot program was started in December 2023 designating workers for public outreach relating to broadband services (Albemarle County Broadband Accessibility and Affordability Office). The program goal is not only to assist residents with ACP pre-enrollment, but also to connect individuals with other resources like digital skills training and working devices.

Outreach Strategies

Any local program model should consider how to support enrollment through recruitment and outreach. The Department of Social Services is a valuable partner in outreach and recruitment as DSS is in a great position to identify clients who could benefit from ACP Bridge. Outreach to their clients can seamlessly include information and links to the program in footers of emails, letters, and social media posts. Eligibility caseworkers and school caseworkers directly connect clients to the program if they express issues with broadband affordability.

Collaboration between digital navigators and community partners is a key strategy to grow public awareness of the program and increase enrollment. Local entities can help promote ACP Bridge to the communities they serve and connect individuals with digital navigators. Having digital navigators recruit through these organizations helps focus the outreach and show community members that the service is being vouched for by a trusted entity. It is important to identify potential community partners that are engaged with underserved communities and who share an interest in broadband equity. These stakeholders can come in numerous forms and together form a digital equity plan coalition (VA Dept. of Housing & Community Development, 2024).

Community Centers

Such as public libraries, public recreation centers, etc.

Education

Public schools, local colleges, continuing education centers, etc.

Healthcare

Local hospitals, clinics, health systems, etc.

Grassroots

Community led clubs, service organizations, religious congregations, etc.

Community partners can also help reduce county administrative responsibilities. For example, Albemarle County digital navigators use platforms from local partners, such as Network2Work and others in the Regional Digital Equity Plan (RDEP) Coalition, to connect with members who have indicated need for broadband cost assistance. The more collaborating organizations, the more people who can help individuals to navigate through the enrollment process.

Maximizing Sustainability & Impact

ACP Bridge in Albemarle County demonstrates a functional model to increase broadband affordability while minimizing administrative burdens and maximizing impact.

A good program model should operate on a path towards reduced labor demands and increased self-sustainability. As demonstrated in the program development summary, there was a lot of initial work and planning put into ACP Bridge. The model shows the components and steps that are needed to make a program like this work well.

Gathering Key Players

ACP Bridge requires work from local internet service providers and various internal partners. It is essential to identify one champion to organize implementation, identify internal and external stakeholders, and set goals for each step of the process. For ACP Bridge, that person was Jason Inofuentes from the Broadband Accessibility and Affordability Office (BAAO). Other stakeholders were needed to procure funding, establish contract work, route agreements, and otherwise help implement and perform outreach.

Having everyone at the table when laying out early plans facilitates feedback and reduces unforeseen complications as work begins.

A common theme from interviewees is that the development process would have been smoother if the key players, as outlined above, had been brought onto the project from the beginning. The early focus of development was pulling in additional partners as issues arose in the process, which caused initial delays. Having everyone at the table when laying out the early plans facilitates feedback and reduces unforeseen complications as work begins.

Planner
Organizing & coordinating

Funding
Handling procurement

Contracts
Negotiating legal agreements

Agreements
Routing signatures & communications

Outreach
Guiding new enrollment

Advising
Giving evaluative feedback

Initial Demands of the Program

The source of funding and its specific requirements and guidelines must be determined. Federal funding, state funding, local funding, and federal grant funding such as through the American Rescue Plan (ARP) each come with their own caveats.

In the case of Albemarle County, local money from BAAO was used. Having a local funding source enabled a "set it and forget it" model in which initial focus was put on creating templates for MOAs with Internet Service Providers (ISPs). By designing a template first, these MOAs are easy to edit, review, and route through all parties for signatures as needed.

Reducing Administrative Burden

After the initial demands for implementing ACP Bridge were met many contributing employees found that their roles did not demand much time to maintain, with most saying the first 6 to 12 months of their involvement were intensive.

Putting time into planning and establishing program logistics early into the process greatly aids in the longevity of the program with less labor burden. For example, creating templates for Memorandums of Agreement (MOAs) reduced the amount of time that had to be spent with each MOA. Contributing County employees also emphasized the importance of setting realistic goals that concrete steps can be taken towards.

The ACP Bridge partners from DSS said their roles were reduced to occasionally helping individuals check their eligibility and apply. Outreach efforts by DSS were made to take minimal effort as prepared footers and links only need to be attached to emails, social media, and newsletters. Additionally, word of mouth promotion is shared between about 160 caseworkers as they are already handling family with issues involving remote learning access and financial stability.
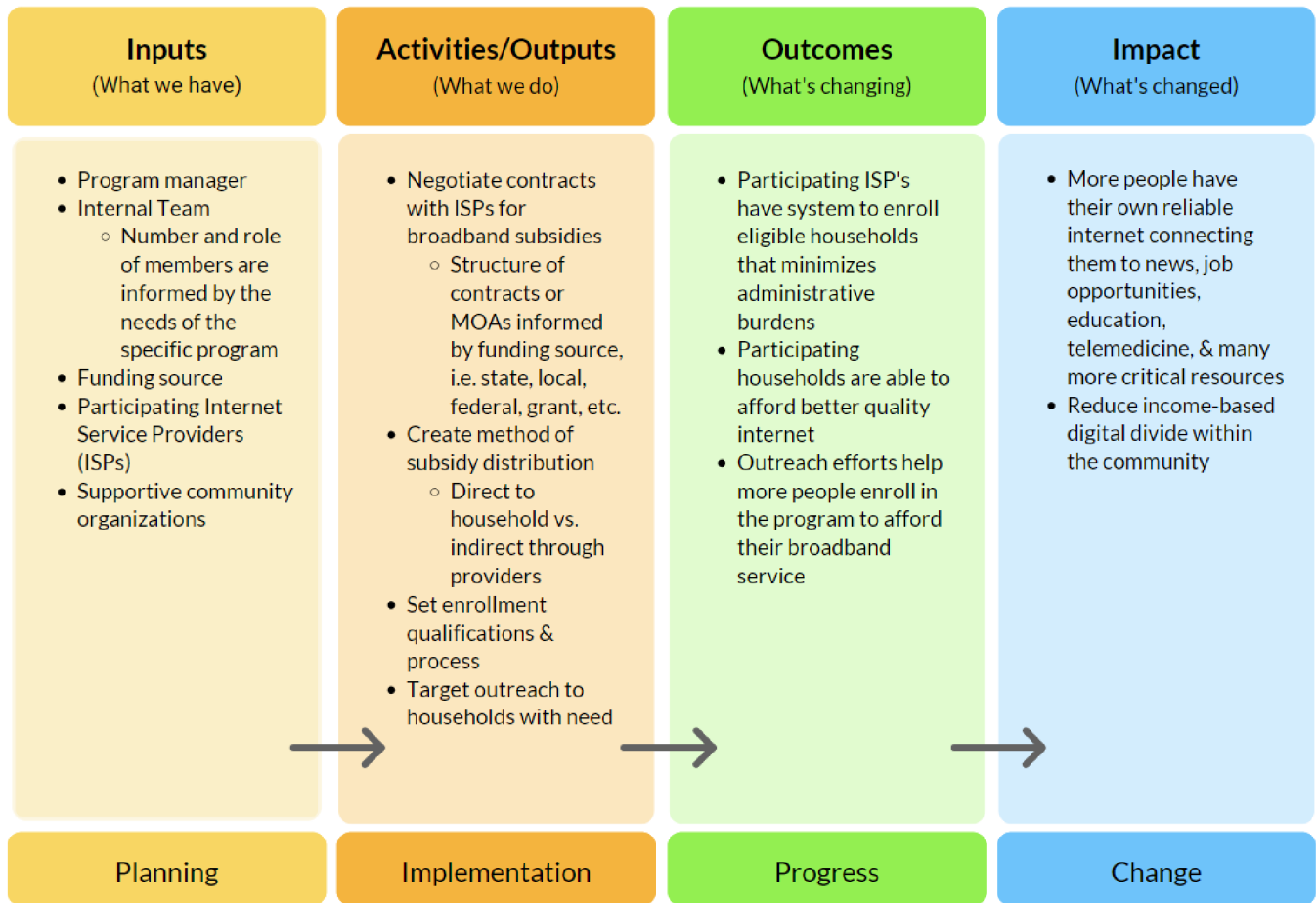
Making Progress Towards Digital Equity

At this time there is limited data to evaluate the public impact of the program. However, there are many markers of progress. Enrollment continues to grow. Outreach efforts seem to be boosting numbers as social service workers have remarked on an increased interest in ACP Bridge from clients.

There is need to increase awareness of ACP Bridge in the public, government, and media. Eventually, the hope is that individuals benefiting from the program will give their account on how broadband access and affordability impacts their lives.

The digital navigator program is being implemented to improve outreach efforts to individuals who could benefit but need more information or guidance. Capacity building for these community stakeholders should be a long-term goal adjacent to implementing broadband subsidy programs. The government can provide resources and advice, while community organizers can greatly boost outreach efforts for government programs. This symbiosis strengthens all local equity efforts.

Albemarle County is on a journey toward digital equity and broadband affordability for all. The new 2 Year Strategic Plan includes a fiscal impact analysis which shows that by meeting targets this program can bolster economic health and community growth worth 2.5 million dollars in 2 years (County of Albemarle, 2023, pg. 16). The intention is to track and reach the original targets of ACP Bridge by 2025.

Logic Model:

Tool to facilitate discussions among program staff, funders, and other stakeholders about program design, expected outcomes, and resource allocation.

Inputs (What we have)	Activities/Outputs (What we do)	Outcomes (What's changing)	Impact (What's changed)

• Program manager
• Internal Team
  ○ Number and role of members are informed by the needs of the specific program
• Funding source
• Participating Internet Service Providers (ISPs)
• Supportive community organizations
	• Negotiate contracts with ISPs for broadband subsidies
	  ○ Structure of contracts or MOAs informed by funding source, i.e. state, local, federal, grant, etc.
	• Create method of subsidy distribution
	  ○ Direct to household vs. indirect through providers
	• Set enrollment qualifications & process
	• Target outreach to households with need
		• Participating ISP's have system to enroll eligible households that minimizes administrative burdens
		• Participating households are able to afford better quality internet
		• Outreach efforts help more people enroll in the program to afford their broadband service
			• More people have their own reliable internet connecting them to news, job opportunities, education, telemedicine, & many more critical resources
			• Reduce income-based digital divide within the community

Planning	Implementation	Progress	Change

Interview Participants

1. Cash, Sharon, Deputy Chief of Procurement, Finance & Budget Office, Albemarle County. Interview. Conducted by Augusta Groeschel-Johnson, 14 September 2023.

2. Culp, Michael, Director of the Broadband Accessibility and Affordability Office, Albemarle County Executive Department. Interview. Conducted by Augusta Groeschel-Johnson, 3 October 2023.

3. DeLoria, Richard, Senior Assistant County Attorney, Albemarle County Attorney's Office. Interview. Conducted by Augusta Groeschel-Johnson, 14 September 2023.

4. Gardner, Kimberly, Chief of the Office of Grants and Agreements, Albemarle County. Interview. Conducted by Augusta Groeschel-Johnson, 16 October 2023.

5. Hoerman, Wanda, Assistant Director, Albemarle County Social Services. Interview. Conducted by Augusta Groeschel-Johnson, 7 September 2023.

6. Inofuentes, Jason, Program Manager of the Broadband Accessibility and Affordability Office, Albemarle County Executive Department. Interview. Conducted by Augusta Groeschel-Johnson, 3 October 2023.

7. Presson, Kathryne, Eligibility Supervisor, Albemarle County Social Services. Interview. Conducted by Augusta Groeschel-Johnson, 7 September 2023.

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