## MEASURING THE EFFECTIVENESS OF DIGITAL INCLUSION APPROACHES (MEDIA) – PHASE II



# The Impact of the Affordable Connectivity Program Outreach Grant on Local Community Organizations in Southern California

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#### Introduction

The Federal Communications Commission (FCC) launched the Affordable Connectivity Program (ACP) in 2022 as a replacement of the Emergency Broadband Benefit program (EBB) to provide low-income households with a monthly subsidy of \$30 for internet service (\$75 for households on qualifying Tribal lands). As part of this initiative, the FCC launched its ACP Outreach Grant Program awarded to local community organizations across the United States to promote awareness of the ACP and assist eligible households with enrollment. The ACP Outreach Grant Program aimed to leverage the expertise and community ties of local organizations to inform eligible households about the program and provide support throughout the enrollment process. Recipient organizations were tasked with developing comprehensive outreach plans, forming partnerships with key stakeholders, and implementing various strategies to reach their target populations.

This report focuses on three organizations in Southern California that received these grants: the California Emerging Technology Fund (CETF), the Korean American Federation of Los Angeles (KAFLA), and United Ways of California (UWCA) to identify the successes, challenges, and policy implications of the ACP Outreach Grant Program. When Congress failed to renew funding for the ACP, the FCC Outreach Grant Program was unexpectedly curtailed in February 2024, leaving many grantee organizations unable to fully execute their outreach plans and raising concerns about the future of low-cost broadband access for low-income households.

## The FCC Outreach Grant Program<sup>1</sup>

Expanding access to affordable, high-speed broadband is an urgent national priority. As Congress stated in the Infrastructure Investment and Jobs Act of 2021<sup>2</sup>, "access to affordable, reliable, high-speed broadband is essential to full participation in modern life." However, despite many existing

<sup>&</sup>lt;sup>1</sup> A substantial portion of this section describing the FCC Outreach Grant Program was shared in an earlier blog post: FCC Outreach Grants: Reaching the Non-Enrolled – USC Annenberg Research Network on International Communication. (n.d.). Retrieved June 25, 2024, from <a href="https://arnicusc.org/fcc-outreach-grants-reaching-the-non-enrolled/">https://arnicusc.org/fcc-outreach-grants-reaching-the-non-enrolled/</a>

<sup>&</sup>lt;sup>2</sup> The Infrastructure Investment and Jobs Act: Prevention and Elimination of Digital Discrimination. (2024, January 22). Federal Register. <a href="https://www.federalregister.gov/documents/2024/01/22/2023-28835/the-infrastructure-investment-and-jobs-act-prevention-and-elimination-of-digital-discrimination">https://www.federalregister.gov/documents/2024/01/22/2023-28835/the-infrastructure-investment-and-jobs-act-prevention-and-elimination-of-digital-discrimination</a>

and new initiatives at the federal, state, and local level, over 31 million American households (about a quarter of all U.S. households) remained without high-speed broadband in 2021, and about 12 million of those lacked Internet access altogether.<sup>3</sup>

The 2023 Statewide Survey on Broadband Adoption in California <sup>4</sup> highlights the persistent challenges in reaching the most digitally disadvantaged households, despite overall progress in broadband adoption. The survey found that "broadband adoption among families with school-age children decreased from 97% in 2021 to 93% in 2023, likely due to the expiration of school-based programs that sponsored internet connectivity during the COVID-19 pandemic." <sup>5</sup> This underscores the need for targeted outreach efforts to ensure that low-income families are aware of and can access the ACP to maintain their internet connections.

Moreover, the survey by the Benton Institute for Broadband & Society<sup>6</sup> reveals that, even after a year of operation, half of all households eligible for the ACP were unaware of the benefit. This lack of awareness was a primary barrier to participation. The survey also points to the importance of collaborating with trusted local institutions and communities, such as libraries, churches, and benefits programs like Medicaid or SNAP, to effectively reach and inform eligible households about the ACP. Outreach initiatives must be tailored to the needs of specific communities, considering factors such as preferred modes of communication (e.g., email, text, or traditional mail) and the varying levels of digital skills among the target population.

Furthermore, the survey findings suggest that integrating activities to promote ACP enrollment with digital equity planning such as digital skills training for jobs or education can be highly beneficial. The link between digital skills and the likelihood of successful ACP enrollment highlights the need for investments in digital skills training alongside efforts to increase awareness and participation in the program.

On March 10, 2023, the FCC Affordable Broadband Outreach Grants Program allocated a total of \$66 million in 197 grants to 195 organizations in 50 U.S. States and Territories to promote awareness of and increase participation in the Affordable Connectivity Program (ACP) among eligible households. On March 15, the FCC announced an additional \$7.5 million in Outreach Grants to 32 organizations in 22 states for two additional outreach programs. Overall, 221

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<sup>&</sup>lt;sup>3</sup> ACS 2021 1-year estimates (Table S2801) – available at: https://data.census.gov/table/ACSST5Y2021.S2801

<sup>&</sup>lt;sup>4</sup> https://www.cetfund.org/action-and-results/statewide-surveys/2023-statewide-survey/

<sup>&</sup>lt;sup>5</sup> A statewide survey shows the digital divide narrowing in California, but many low-income residents remain under-connected. (n.d.). Retrieved June 25, 2024, from <a href="http://annenberg.usc.edu/news/research-and-impact/statewide-survey-shows-digital-divide-narrowing-california-many-low-income/">http://annenberg.usc.edu/news/research-and-impact/statewide-survey-shows-digital-divide-narrowing-california-many-low-income/</a>

<sup>&</sup>lt;sup>6</sup> Half of ACP-Eligible Households Still Unaware of the Program. (2023, March 17). Benton Foundation. https://www.benton.org/blog/half-acp-eligible-households-still-unaware-program

<sup>&</sup>lt;sup>7</sup> https://www.fcc.gov/document/fcc-announces-66m-affordable-broadband-outreach-grants

<sup>&</sup>lt;sup>8</sup> FCC Targets Over \$7M Toward Affordable Connectivity Program Awareness | Federal Communications Commission. (2023, March 15). <a href="https://www.fcc.gov/document/fcc-targets-over-7m-toward-affordable-connectivity-program-awareness">https://www.fcc.gov/document/fcc-targets-over-7m-toward-affordable-connectivity-program-awareness</a>

organizations are receiving 229 grants, ranging from \$26,760 to \$878,128 (average \$320,818) under the following four programs:

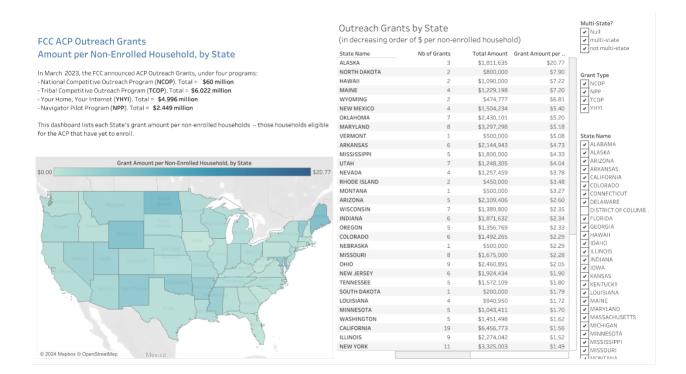
FCC Outreach Grant Program	Total	
National Competitive Outreach Program (NCOP)	\$60.00 m	
Tribal Competitive Outreach Program (TCOP)	\$6.02 m	
Your Home, Your Internet (YHYI)	\$5.00 m	
Navigator Pilot Program (NPP)	\$2.45 m	
Total	\$73.47 m	

When the grants were announced, out of 52.2 million U.S. households eligible for the Affordable Connectivity Program (ACP), 37.2 million (71%) have yet to enroll in the program. The FCC Outreach Grants aimed to enlist community partners nationwide to reach historically underserved and unserved communities.

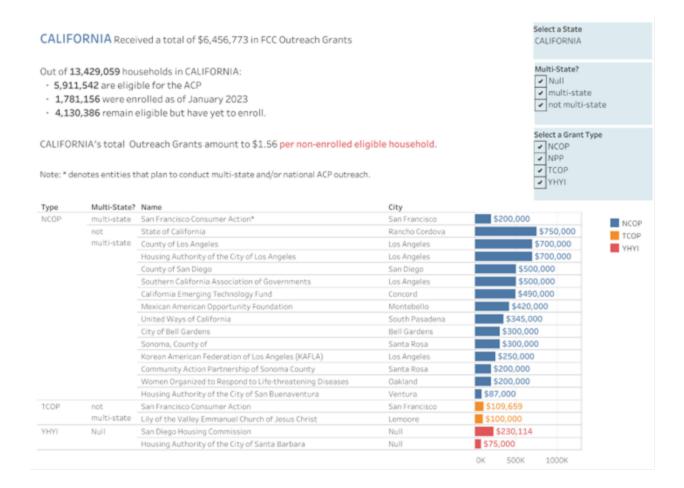
Non-enrolled households, those eligible households that had yet to enroll in the ACP, constituted the main focus of the Outreach Grants. Nationwide, the \$73.47 million total budget amounted to \$1.98 per non-enrolled household. Grant amounts varied broadly by state, from \$0.20 per non-enrolled household (Iowa) to \$20.77 per non-enrolled household (Alaska) — excluding the District of Colombia, an outlier at \$84.55, largely because 7 out of 9 grants awarded to DC organizations were intended for ACP outreach beyond the District. Overall, 27 grants were awarded for "multistate and/or national ACP outreach" to organizations located in 16 states. These 27 multi-state grants accounted for 20% of the combined NCOP and TCOM \$66 million budget.

FCC outreach grants were administered on a reimbursement basis. Recipient organizations did not receive the funds up-front but were instead required to submit receipts and invoices for outreach efforts undertaken and received reimbursement. This became an important distinction when at the beginning of 2024 the FCC instructed grantees to stop outreach efforts as no new ACP enrollments would be accepted after February 7, 2024 because it expected ACP funding to run out in April 2024. Grantees who executed outreach early were able to receive reimbursements, while others missed their chance.

Two interactive dashboards provide a closer look at how these grants were distributed across the nation. The <u>first dashboard</u> calculates and maps the grant amount per non-enrolled household in each State.



The <u>second dashboard</u> provide a list of the grants by state, along with a summary of the ACP enrollment situation in that state. Below is the list of outreach grants for California:



#### **Case Studies Selection**

We focus on three Southern California recipients of ACP Outreach Grants: the California Emerging Technology Fund (CETF), the Korean American Federation of Los Angeles (KAFLA), and United Ways of California (UWCA). CETF was awarded a \$490,000 grant, KAFLA \$250,000, and UWCA \$345,000, totaling \$1.085 million, or 17% of the total awarded to California Outreach Grant recipients. These organizations were selected after careful consideration and outreach to all ACP grantees in the Southern California region.

Our goal was to showcase a diverse range of organizations in terms of size, scope, and approach to ACP outreach and enrollment. By including a branch of a national organization (UWCA), a large statewide organization (CETF), and a smaller community-based organization (KAFLA), we aim to demonstrate the varied experiences and challenges faced by different types of grantees.

Moreover, these organizations were at different stages of their ACP outreach efforts when the program was unexpectedly curtailed. CETF had completed about 40 enrollment events out of the proposed 50, KAFLA had enrolled over 1,000 individuals, and UWCA had just begun to implement their outreach plan. This variance allowed us to examine the impact of the program's curtailment on grantees at different phases of their work.

Although we only conducted a qualitative examination of three grant recipients, we believe that the experiences of these three organizations provide valuable insights into the successes, challenges, and policy implications of the ACP Outreach Grant program. By highlighting the range of approaches and outcomes among these grantees, we aim to showcase the usefulness and potential of local community organizations in promoting low-cost broadband access and closing the digital divide.

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## California Emerging Technology Fund (CETF)<sup>9</sup>

#### **Background and Target Populations**

The following account combines excerpts from internal CETF documents shared with us and interviews with CETF officials. The California Emerging Technology Fund (CETF) is a statewide non-profit organization established in 2005 by the California Public Utilities Commission (CPUC) with the mission to close the Digital Divide. CETF's target populations are low-income households, with a focus on the poorest residents. They work with community-based organizations (CBOs) and public agencies to connect these households to affordable internet service and provide digital literacy training.

According to CETF's background narrative documents for its FCC ACP Outreach Grant application, prior to receiving the ACP outreach grant, CETF had managed more than \$149 million in grants and initiatives, including \$58 million in grants to over 100 CBOs and public agencies, connecting 775,000 low-income households to the internet and training 1 million individuals in digital literacy. CETF also had experience managing three large federal grants, demonstrating their capacity to handle significant outreach efforts.

According to an interview with CETF's President and CEO Sunne Wright McPeak, the organization has employed various outreach methods, including Direct Notification, Direct Mail, and in-person enrollment events. Direct Notification involves informing eligible low-income households about the Affordable Connectivity Program (ACP) and encourage enrollment. CETF has collaborated with credible sources, such as state agencies, to include ACP information in existing communications (such as informational inserts in bills) sent to their program participants. Direct Mail is a proxy for Direct Notification that involves non-governmental community organizations mailing informational material to selected zipcodes.

CETF's background narrative documents state that CETF has worked to ensure that the timing and coordination of these notifications align with the capabilities of the Get Connected Call Center, which they also manage. They have also focused on making the ACP information prominent and clear within the notification materials. In some cases, CETF has incorporated ACP details into planned or existing communications to maximize cost-effectiveness, while in other instances, they have developed dedicated Direct Notifications that focus solely on ACP, which may require additional resources necessary to support the increased volume of calls and enrollments resulting from the Direct Notification campaigns.

According to McPeak, the organization's data shows that Direct Notification and Direct Mail, supported by the Call Center and community-based organizations (CBOs) assisting over the phone, have been more effective in enrolling households compared to in-person events (this is

<sup>&</sup>lt;sup>9</sup> While CETF partnered with USC and Pew on a separate component of this research project, they did not fund any of this work. This case study is based on outreach grant documents provided by CETF as part of their reporting to the FCC, analyzed independently by USC researchers.

summarized in *Figure1* below). In addition, CETF's performance-based grant model, which compensates sub-awardees per enrollment, has proven to be an efficient approach, with CBOs achieving enrollments at an average cost of \$45-\$65 per household when supported by Direct Notification and Call Center referrals.

Through Direct Notification and Direct Mail strategies, CETF and its partners enrolled nearly 49,000 households in the EBB and ACP programs. In contrast, the 75 ACP Enrollment Events organized and managed by CETF before the FCC Grant resulted in 1,164 households enrolled, with an average of 19-20 enrollments per event.

#### **Outreach Plan and Implementation**

According to CETF's budget narrative for the FCC ACP Outreach grant, CETF's ACP outreach plan focused on three main outcomes:

- 1. Informing and engaging 500,000 ACP-eligible households on how to enroll and obtain inperson assistance.
- 2. Conducting 50 ACP in-person Enrollment Events throughout California.
- 3. Enrolling 5,000 households in ACP and informing them about available digital literacy training and affordable computing devices.

To achieve these outcomes, CETF collaborated with various partners, including the California Department of Technology (CDT), the California State Association of Counties (CSAC), County Offices of Education (COEs), and 11 regional and community-based organizations, consisting of 7 Regional Broadband Consortia (RBCs), 3 non-profit community-based organizations (CBOs), and 1 county. CETF developed a comprehensive Tool Kit to support the organization and management of ACP Enrollment Events, which included customized fliers in four languages, intake forms, questionnaires, and templates for progress reports.

CETF and its partners employed various outreach methods, such as door-to-door outreach by "trusted messengers" who are residents of the target neighborhoods, flier distribution, direct mail, text messages, and planned mailings. The focus was on conducting enrollment events in high-poverty communities with a critical mass of 5,000 eligible households, prioritizing 20 counties that comprised 82% of all ACP-eligible households in California. The goal was to enroll 100 households per event.

CETF also focused on developing the Tool Kit, establishing a call center for enrollment event support and further assistance to households who couldn't enroll in person, and recruiting and training volunteers and staff to be deployed. Partners' roles and responsibilities would be more focused on on-the-ground coordination, such as identifying priority communities (counties with over 5,000 eligible households not enrolled), event scheduling, volunteering, day-of operations, and interactions with households.

In addition to the enrollment events, CETF planned call centers to help those who couldn't enroll at events in person. This multi-faceted approach aimed to maximize the reach and effectiveness of

the ACP outreach plan, ensuring that eligible households were informed about the program and had the necessary support to enroll and access the benefits.

#### **Achievements and Challenges**

According to an interview with CETF's Broadband Adoptions Manager Marissa Canche, under the FCC ACP grant, CETF had 10 sub-grantee partners tasked with conducting 50 in-person ACP enrollment events across California. CETF's 10 sub-grantee partners were a diverse group spread across California, ranging from organizations like Tech Exchange in Oakland to the Broadband Consortium in the Santa Barbara area. Some partners had prior experience organizing ACP enrollment events, while others required training from CETF on coordinating such events. CETF collected data from event participants through an 'ACP Passport' survey that gathered

CETF collected data from event participants through an 'ACP Passport' survey that gathered information on their demographics, current connectivity status, digital skill levels, affordability challenges, and views on the importance of home internet and devices.

The survey asked participants how they heard about the ACP enrollment event. Out of 540 participants, 446 provided responses (Table 1). Flyers were mentioned most often, in 67% of the responses, including flyers received from community organizations, during community events, or in the mail. Outreach from community organizations came next, mentioned by 28.7% of the respondents, followed by online outreach via email, social media or advertising (19.3%). Many respondents mentioned overlapping sources, for example when they received a flyer at an event organized by a community organization. Shows the co-occurring mentions of information sources about the ACP events, indicating that Flyers, Community and Online overlapped most substantially.

Information Source	mentions	percent	
Flyer (including mailings)	299	67.0%	
Community Organization	128	28.7%	
Online (Email, Social Media)	86	19.3%	
Event, Festival	55	12.3%	
Word of Mouth	7	1.6%	

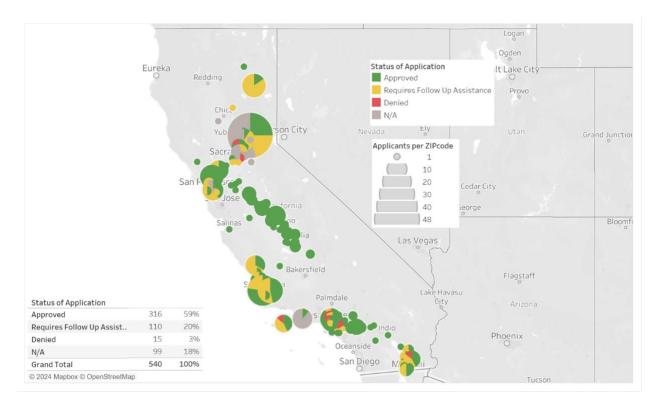
Table 1: mentions of information sources for ACP enrollment event, among 446 valid responses (total greater than 100% due to multiple mentions)

	N/A	COMMUNITY	EVENT	FLYER	ONLINE	WORD-OF-MOUTH	Total
N/A	94						94
COMMUNITY		68	1	59			128
EVENT		1	53	1			55
FLYER		59	1	171	68		299
ONLINE				68	18		86
WORD-OF-MOUTH						7	7
Total	94	128	55	299	86	7	669

Table 2: Co-occurrence of mentions of information sources

CETF outreach events extensively covered the state of California. Figure 1 maps the outreach events by ZIPCODE and shows the status of the ACP applications at the time of the event. The

data shows that 59% of the applications were approved on the spot during the outreach event, with an additional 20% slated for follow-up assistance.



 $Figure \ {\it 1: Status of ACP applications completed through CETF outreach event}$ 

Table 3 summarizes some of the key demographics of the ACP Enrollment events participants. It highlights that the majority of participants are low-income (79% of respondents belong to households whose income is below \$40,000 per year) and 57% of the respondents' households primarily speak a language other than English (38% Spanish and 17% Chinese). 67% of respondents qualified for ACP as recipients of MediCal/Medicare, 10% through their participation in SNAP/CalFresh. Notably, most respondents for whom there is no Application Status provided no qualifying program.

		Applica	tion Status		
Household Annual Income:	Approved	Denied	Requires Follow Up	N/A	Grand Total
\$19,999 (and under)	72	. 2		41	
\$20,000 - \$39,999	85		32	28	145
\$40,000 - \$59,999	37	1	17	6	61
\$60,000 - \$99,000	3	1	2	5	11
\$100,000 or More		1	2	1	4
Decline to State	4	2	3	5	14
no response	115	8	33	13	169
Grand Total	316	15	110	99	540
People in Household	Approved	Denied	Requires Follow Up	NI /A	Grand Total
1-2	114			41	
3-4	78			26	
5-6	56			15	
7+	17		6	11	
no response	51		22	6	
Grand Total	316			99	
Grand Total	310	13	110	99	540
Language Spoken at Home	- Approved	Denied	Requires Follow Up	N/A	<b>Grand Total</b>
English	77	5	44	60	186
Spanish	108		34	21	163
no response	67	2	25	12	106
Chinese	58	8	6		72
English and Spanish	2		1		3
Vietnamese	2				2
Punjabi				1	
Russian				1	1
Turkish/Arabic				1	1
Hindi				1	
Ukranian				1	
Japanese				1	1
American Sign Language	1				1
Mixteco	1				1
Grand Total	316	15	110	99	540
Eligibility Program	→ Approved	Denied	Requires Follow Up	N/A	Grand Total
Medical/Medicare	239			13	
no response	6			62	
CalFresh/SNAP	25			9	
Income	8			11	
Free or Reduced Lunch Program	16		8	4	
SSI	10		6		16
WIC	7		4		11
Federal Public Housing	4		1		5
LifeLine	1		1		2
Grand Total	316		110	99	

Table 3: Demographics of ACP Enrollment Event Participants

During the enrollment events, CETF distributed approximately 130 devices to attendees. As a condition of receiving these devices, recipients agreed to participate in follow-up digital literacy training courses offered online by CETF. This was part of CETF's efforts towards holistic digital inclusion beyond just providing internet access.

CETF encouraged its sub-grantee partners to implement creative outreach strategies. One example was a partner setting up an event at a McDonald's shopping center, with staff even live-streaming on Facebook Live announcing their event location and timing, which drew in a line of interested applicants within an hour.

CETF also identified certain challenges in outreach efforts. Firstly, there is still a general mistrust of people who are informed about a benefit program but unsure how legitimate the program would be, especially if the program involves applicants bringing their legal documents.

Secondly, language capabilities emerged as a challenge for in-person enrollment events, with some partners lacking adequate staffing to serve non-English speaking attendees, especially Spanish speakers. In some cases, CETF reached out to existing partnerships to provide translation support. Thirdly, the FCC grant had a specific requirement that enrollments had to be completed fully inperson at the events. If an application couldn't be approved on the spot, CETF's call center would follow up to complete it over the phone, but those couldn't be counted towards the grant goals. As shown in Figure 1, 58.5% of applications were approved during the event.

With the ACP program freeze, CETF has now pivoted its focus to promoting awareness about affordable home internet plans offered by internet service providers, while continuing its digital literacy training initiatives for those who received devices that CETF had been able to provide during the enrollment events from other (non-FCC) grants.

## **Policy Learnings**

CETF's experience highlights several policy implications for future low-cost broadband grant programs:

- 1. Direct Notification and Direct Mail, coupled with Call Center support and CBO assistance over the phone, have been far more effective in reaching and enrolling eligible households compared to in-person events. While in-person enrollment events are still necessary to assist people who cannot self-enroll or be helped by telephone, CETF's experience suggests that they should not be the primary focus of future grants aimed at assisting low-income households in getting connected to the internet. In addition, call centers also complement in-person enrollment events as the applicants that are not able to complete in the in-person events would be able to complete enrollment via phone.
- 2. Integrating digital literacy training and device distribution alongside broadband access programs to promote holistic digital inclusion has potential benefits. CETF provided devices and digital literacy training to participants, recognizing the interconnected nature of access, affordability, and skills. By bundling device access and digital training with the broadband subsidy, CETF aimed to address these interconnected barriers to full digital inclusion in a comprehensive manner.
- 3. This case highlights the need for flexibility in program requirements, such as allowing for a combination of in-person and remote enrollment options, to accommodate various household circumstances and preferences as well as any issues related to enrollment that may not be solvable or completable at in-person sites. If an application couldn't be approved on the spot, CETF's call center would follow up to complete it over the phone,

but those remote enrollments couldn't be counted towards the grant goals. This inflexible requirement created challenges, as some households may have preferred or required remote assistance due to various circumstances. Allowing a hybrid model with both in-person and remote options could better accommodate diverse household needs and preferences. According to the strict FCC criteria, CETF was able to complete 341 ACP enrollments <sup>10</sup> during the outreach events supported by the \$292,326.99 they were able to claim from their \$490,000 grant (or 59% of total grant), suggesting a "per-capita acquisition cost" of roughly \$850 per sign-up. CETF stipulates that "successful implementation has a front-loading of effort and ramp-up. CETF would have completed the 5,000 enrollments [in the grant proposal] if the FCC had not terminated the grant and the cost per ACP Enrollment would have been \$65 and "all-in" cost would have been \$95." In addition, this metric substantially underestimates the grant's impact as it ignores the many applicants who were able to sign-up on their own or with follow-up assistance via call centers. This suggests that future digital equity outreach efforts should be evaluated according to more comprehensive metrics.

4. CETF shows the value of collecting data and feedback from program participants to understand their needs, challenges, and the impact of losing access to low-cost broadband. By gathering direct feedback and data from program participants, such as CETF did through the "ACP Passport" survey, participants can provide valuable insights into the real-world experiences, barriers, and needs of the target population. This also potentially allows follow-up surveys, which could permit assessing the impact of subsidized internet access over time.

#### **Sources**

CETF Background Narrative FCC ACP Grant App 2023
CETF ACP Mobilization Report to DHCS and CDSS Final 82423
ACP Enrollment and Direct Notification Summary for USC 50124
CETF Overview Updated Budget for FCC ACP Grant App 2023

<sup>&</sup>lt;sup>10</sup> In addition to the 316 participants who completed the Passport Survey, 25 other participants who did not complete survey (and are thus not included in the data presented in Table 3) were enrolled in ACP during the outreach events.

#### **Korean American Federation of Los Angeles (KAFLA)**

## **Background and Target Populations**

According to KAFLA's application document for the ACP Outreach Grant, the Korean American Federation of Los Angeles (KAFLA) was founded in 1962 and is a nonprofit organization that represents and empowers the Korean American community in Los Angeles County. They serve over 40,000 people annually, particularly underserved, hard-to-reach, low-income multilingual/multicultural diverse ethnic residents, mostly towards monolingual/limited-English proficient Korean Americans, but also including Asian American & Pacific Islander, Latinx, and African American community members.

Throughout the pandemic, KAFLA provided one-stop multilingual/cultural education, outreach, case management, and technical assistance to help underserved, monolingual/limited-English proficient Korean American and diverse neighboring stakeholders access critical resources. KAFLA had been providing in-kind enrollment assistance in the ACP to their constituents since early 2022.

## **Outreach Plan and Implementation**

KAFLA's ACP outreach plan aimed to reach 750,000 people over two years through a comprehensive approach that included in-person community canvassing, digital media campaigns, and Korean media campaigns. Their goal was to provide 7,920 clients with in-language, in-person enrollment assistance with the ACP, focusing on the most vulnerable and hard-to-reach populations in the Los Angeles metropolitan area.

KAFLA's target population primarily consisted of low-income, elderly, monolingual Korean speakers in the Los Angeles area. They also aimed to reach other "hard-to-reach" populations, including monolingual/limited-English proficient individuals from various communities, such as AAPI, African American, and Latinx. Additionally, they focused on assisting the elderly, undocumented, disabled, and veterans. To cater to the diverse needs of their target population, KAFLA planned to offer services in Korean, Mandarin, and English.

#### **Outreach Channels:**

- 1. In-person outreach (targeting 24,000 people): KAFLA planned to host 96 in-person enrollment events over 24 months, averaging 4 events per month.
  - a. Community canvassing: KAFLA set up booths and distributed literature at community events, ethnic groceries, and churches. This approach allowed them to directly engage with their target population and provide information about the ACP and the available assistance.
  - b. KAFLA's Community Center: The community center served as a hub for daily assistance, where individuals could walk in and receive help with ACP enrollment. KAFLA also maintained a dedicated ACP hotline for people to make appointments and ask questions.
- 2. Digital media (targeting 210,000 people):
  - a. YouTube (KAFLA TV): KAFLA has a YouTube channel called KAFLA TV, which would be used to host Korean language webinars and posts about the ACP.

With over 15,000 subscribers and 104,000 views per month, this platform would allow them to reach a significant portion of their target audience through engaging video content.

- b. E-newsletter: KAFLA sent out regular e-newsletters to their subscribers, providing updates and information about the ACP and the available assistance.
- c. KAFLA mobile app: The mobile app served as another digital touchpoint, allowing users to access information and resources related to the ACP on their smartphones.
- d. KakaoTalk text banking: KAFLA utilized KakaoTalk, a popular messaging app among the Korean community, to send text messages and share information about the ACP and the available assistance.
- 3. Korean legacy media (targeting 516,000 people): KAFLA invested in paid advertisements across various Korean language media outlets to reach a broader audience. These outlets included:
  - a. Radio stations such as Radio Korea and Radio Seoul
  - b. Korean-language dailies such as Korea Times LA, Korea Daily
  - c. US branches of news outlets based in South Korea such as KBS America and SBS International

## **Achievements and Challenges**

According to an interview with KAFLA's president James An, the organization was proactive in their outreach efforts, utilizing a variety of strategies to reach their population. KAFLA provided an in-person, in-language application assistance in their community centers from Monday to Friday, sitting down with constituents and helping them through the entire enrollment process. KAFLA also partnered with a Spanish speaking organization to do a joint community event to be able to hold events in multiple languages.

They also focused their efforts on locations like senior housing complexes where they knew many of their clients resided and who would likely qualify based on income, and a enrollment event they undertook at a senior housing unit in downtown LA became their biggest event. KAFLA strategically partnered with internet service providers (ISPs) like Verizon that were willing to work closely with them and do on-site enrollments at such outreach events. This allowed for a seamless sign-up process for non-English speakers as they had in-language support on site.

In addition, because KAFLA's clients were mostly Korean American older adults, instead of utilizing social media for its outreach, it opted to utilized paid media advertisements on legacy media, such as Korean-language television, radio, and print newspapers to promote the ACP program. They created a professional television ad specifically for ACP outreach. As an organization serving the Korean community in LA County, they effectively reached the monolingual Korean-speaking population, especially elderly individuals. They also uploaded the ad onto their YouTube channel.

The abrupt ending of the ACP program ahead of the originally planned 2025 end date, however, left KAFLA with paid media contracts extending until the original ACP Outreach Grant's end date of 2025 that KAFLA may have to pay penalties to get out of. The short notice also made their television ad and other outreach materials obsolete.

Moreover, while the online national verifier tool was meant to streamline eligibility checks, it often experienced technical issues that made the process tedious for KAFLA staff assisting applicants. As many of KAFLA's constituents were monolingual non-English-speaking Korean older adults, it was difficult for them to complete the final step of contacting the ISP to get set up with the discounted internet plan even after getting their eligibility approval, due to the language barrier. This barrier made it easier for KAFLA to work with ISPs such as Verizon who were willing to attend in-person enrollment events where non-English speakers were in the audience.

According to an intake sheet that KAFLA shared, the organization interacted with over 300 applicants. Most signups took place during the months of December 2023 and January 2024. Half of KAFLA's outreach was geographically focused tightly on the neighborhoods they serve. Around 30% of the participants hail from the neighboring areas of Downtown Los Angeles and Chinatown and almost 20% hail from Koreatown.

Figure 2 analyzes that intake data and maps the participants in KAFLA outreach efforts under the FCC Outreach Grant by their home ZIPCODES, showing the outcome of the outreach. The vast majority of KAFLA's outreach was concentrated on residents of L.A.'s Koreatown, who constitute the main population KAFLA serves. Out of 309 participant interactions during these outreach events, KAFLA was able to complete 207 ACP enrollments on the spot (67%), while another 88 would require some form of follow-up (28%).

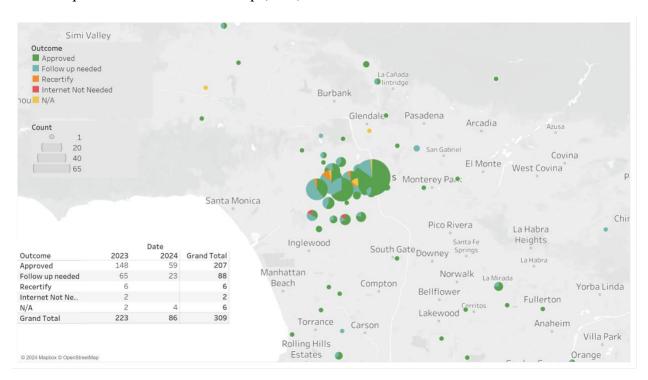


Figure 2: KAFLA ACP Outreach Efforts

Overall, KAFLA took a very hands-on, locally focused approach that was effective in signing up members of the Korean community in LA for the ACP program, despite the various challenges they encountered. KAFLA's next steps involve seeking alternative funding sources to continue their outreach efforts, regardless of whether they receive official funding or not, as the organization is accustomed to operating without full reliance on government funding. They are willing to continue assisting the community by shifting their focus towards initiatives like promoting Lifeline discounts to those who are unaware of the program.

#### **Policy Learnings**

KAFLA's experience suggests several policy implications for future low-cost broadband grant programs:

- 1. The requirement for grantees to maintain neutrality among ISPs and invite all providers to enrollment events can be impractical and hinder efficient enrollment, especially for non-English speaking populations that may not be able to call the ISPs and sign up on their own, despite being eligible. Policymakers should consider allowing grantees more flexibility to partner with responsive ISPs willing to attend in-person events to streamline the enrollment process for these populations.
- 2. Grantees should be permitted to focus on direct, in-person enrollment assistance rather than broad, untargeted outreach methods that may not effectively reach the most underserved populations.
- 3. KAFLA was able to claim reimbursements for approximately 50% of their \$250,000 grant, totaling \$121,394. According to the strict FCC criteria, KAFLA completed 207 ACP enrollments during the outreach events supported by the grant, suggesting a "per-capita acquisition cost" of roughly \$586 per sign-up. A substantial portion of this expenditure was allocated to marketing and paid advertisements to disseminate information about the program, the initial startup costs associated with launching the advertising campaign. In fact, this metric likely substantially underestimates the grant's impact as it ignores the many applicants who were able to sign-up on their own based on KAFLA ethnic media outreach or with follow-up assistance. This suggests that future digital equity outreach efforts should be evaluated according to more comprehensive metrics.
- 4. Future grant programs should prioritize funding for organizations with deep ties to and trust within the communities they serve, as they are best positioned to conduct effective outreach and enrollment.

5.

#### Source

Kafla's ACP Outreach Grant Application Template to FCC KAFLA ACP Notice of Award(5-26-2023)

## **United Ways of California (UWCA)**

#### **Background and Target Populations**

United Ways of California (UWCA) is the statewide association of California United Ways, which are independent, locally based nonprofits that support people's health, education, and financial sustainability. Their target populations are ACP-eligible households, especially those in rural areas where internet service is available but not always accessible. These households typically include Latinx communities, people with disabilities, non-English speakers, and people identified through past affordable broadband outreach efforts.

UWCA and their state network have been involved in broadband outreach and adoption since 2012, targeting households in digitally isolated areas throughout rural California.

#### **Outreach Plan and Implementation**

UWCA's ACP outreach plan included a wide range of activities and events designed to reach a large and diverse audience across California. The plan aimed to conduct outreach touching approximately 3.5 million Californians over two years, screen approximately 100,000 households for ACP eligibility, and directly assist approximately 33,333 households in successfully completing an ACP application.

UWCA partnered with 9 local United Ways as contractors to conduct a coordinated, statewide outreach and enrollment campaign for the ACP. This collaboration would allow them to leverage existing relationships with community partners, schools, community colleges, and Volunteer Income Tax Assistance (VITA) sites. UWCA appointed an ACP Outreach Program Manager to oversee subcontracts with the local United Ways and lead the development of outreach materials for all mediums. The local United Ways would be responsible for translating and customizing these materials to better serve the populations in their respective areas.

UWCA's outreach plan focused on 21 counties (730 zip codes) in California, where approximately 1.2 million households were eligible but not enrolled in the ACP. They placed a major emphasis on reaching Latinx households, people with disabilities, people in rural areas (farm workers), and non-English speakers. Other target populations included very low to moderate-income levels, racial minority groups (Asian, Black or African American, Native Hawaiian or Pacific Islander, Native Tribal members), and gender minorities.

UWCA's in-person outreach efforts would be concentrated in 9 counties where local United Way branches had established partnerships with free tax preparation sites.

#### Outreach Methods:

- 1. Online:
  - a. Social media posts: UWCA created customizable social media content for local United Ways to share on their platforms.
  - b. Website updates: UWCA updated their website with information about the ACP and available assistance.
- 2. In-person:

- a. Outreach: 9 counties where local United Way branches had established partnerships with free tax preparation sites, distributed flyers to reduced-price lunch households at schools, and raised awareness in community colleges.
- b. Enrollment: UWCA and local United Ways provided in-person enrollment assistance at easily accessible locations, such as schools, community colleges, and libraries.

## 3. Legacy media:

- a. Billboards: UWCA planned to display 5 different billboards for 6 months each, which they estimated would reach the largest amount of people out of all the outreach mediums.
- b. Radio and TV Public Service Announcements: UWCA planned to run public service announcements on radio and television, including on Spanish-language networks like Univision and Telemundo.

#### 4. Phone:

- a. Call center outreach: UWCA planned to utilize call centers to reach out to potential ACP beneficiaries.
- b. SMS-Text Based Screening Tool: (211-211 text messaging platform): UWCA leveraged the 211-211 platform, which can target, and screen text subscribers based on known data such as zip code, past program participation, household size, income, and other factors. They planned to send outreach messages to 50,000 low-income subscribers in California and use the platform as a screening tool to determine eligibility and refer individuals to local or online resources based on their zip code. This tool would enable them to rapidly screen consumers for eligibility without using the internet, making the process more accessible for those with limited internet access or digital literacy skills.

#### **Achievements and Challenges**

According to an interview with United Ways of California Digital Outreach Program Manager, Brian Park, United Way of California was awarded a \$345,000 grant from the FCC to conduct outreach and enrollment assistance for the ACP program across the state. Texting outreach campaigns were identified as one of the most successful tactics, with United Ways of California setting up dedicated SMS flows for people to check ACP eligibility by texting a keyword. However, social media promotion proved less effective for reaching the target unconnected population. Traditional outreach methods like hanging posters, handing out flyers at community events, and leveraging partner organizations also yielded good results.

A major challenge faced by United Ways of California was the short timeline between receiving funding in late January 2024 and the ACP program's curtailment shortly after. This compressed window severely limited their ability to fully operationalize planned initiatives like providing enrollment assistance at tax preparation sites before the program was paused.

Language barriers represented another significant hurdle, especially in reaching the large Hispanic population in California where households are monolingual non-English speakers. United Ways of California had to rely on translation services or partnership organization staff to bridge this gap during enrollment events.

There were also difficulties in countering misleading claims from internet service providers who sometimes told eligible clients that they were ineligible or tried aggressively up-selling higher-priced plans instead of the ACP-discounted options. Raising awareness about low-cost plan availability was an ongoing need. With the discontinuation of the ACP, United Ways of California is now focusing on raising awareness and enrolling individuals in affordable internet plans (under \$30, such as Xfinity's Internet Essentials plan) offered by ISPs. However, because these plans are not highly profitable, ISPs do not actively market them. Additionally, when individuals apply for these affordable plans, they often face a tedious and time-consuming process that varies by provider.

Another challenge mentioned was related to the difficulties in keeping track of different channels of communication related to the lack of coordination among various grant recipients and individuals working on the same issues highlighting a need for centralized messaging and better collaboration. This, in addition with increased data sharing amongst recipients, would help with identifying overlapping efforts and allocating resources efficiently.

Additionally, United Ways of California noted that ISPs often consider their coverage maps as intellectual property, making it challenging for organizations to determine precise areas for outreach. Increased transparency from ISPs would enable more effective outreach to underserved communities. They are hopeful that the upcoming cycle of broadband funding, which includes updates to the CPUC's broadband map, will improve this situation.

Despite the curtailment, United Ways of California still hopes to continue digital literacy efforts to help recently connected households navigate the internet effectively, similar to the longer-term post-ACP plans of CETF. They also aim to integrate broadband access into other assistance programs as an "on-ramp" to facilitate access to additional benefits and resources. There are limitations to current forms of benefit screeners that the organization uses as users are required to have internet access to access the screener to see if they are eligible for different kinds of benefits.

However, uncertainties around future funding pose challenges in sustaining outreach and new enrollment efforts. United Ways of California is considering seeking additional grants from existing funding sources like the California Public Utilities Commission to continue this work, recognizing the strong desire for digital equity but constraints from the broader political situation. Overall, while United Ways of California was able to lay important groundwork and identify some best practices, the compressed timeline significantly limited the full potential impact of the ACP outreach grant on facilitating broadband adoption among underserved populations in California.

#### **Policy Learnings**

UWCA's experience highlights several policy implications for future low-cost broadband grant programs:

1. Integrating ACP outreach with existing free tax preparation services can be an effective way to reach eligible households. Future grant programs should consider encouraging partnerships between grantees and organizations that provide free tax assistance.

- 2. SMS-based eligibility screening tools can help streamline the process of identifying eligible households, especially those without internet access. Grant programs should support the creation and implementation of such tools to improve the efficiency and effectiveness of outreach.
- 3. Future programs should consider that organizations of different sizes and scope operate on different timelines, and larger organizations that work through partners need more time to implement their plans.
- 4. Establishment of a dedicated communication and coordination platform specifically tailored for ACP grant recipients and stakeholders. This platform would serve as a centralized hub for sharing project updates, best practices, and relevant data among grant recipients, ensuring alignment of efforts and minimizing duplication.

#### **Source**

**UWCA ACP Grant application info** 

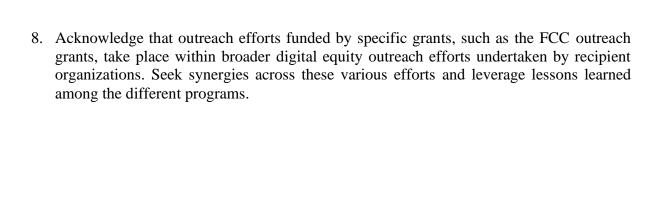
#### Conclusion

The experiences of CETF, KAFLA, and UWCA demonstrate the potential of local community organizations to effectively promote the ACP and assist eligible households with enrollment. These organizations leveraged their community ties, partnerships, and diverse outreach strategies to reach their target populations and provide in-person enrollment assistance.

However, the unexpected curtailment of the ACP prevented many organizations from fully executing their outreach plans and raised concerns about the future of low-cost broadband access for low-income households. The abrupt end of the program left many grantees unable to utilize their full grant funding, forced them to cancel planned outreach activities, and raised fears that the progress made in closing the digital divide would be reversed. One interviewee, describing the experience of being told that the funding would be curtailed, said it felt "disrespectful" as it did not take into consideration how communities they serve would be affected firsthand and that it would be "a really, really sad day" if ACP disappeared altogether. Another interviewee admitted that they did not know what their future plans for connectivity would look like as they would have to re-pivot their strategy and start from scratch.

To maximize the impact of future low-cost broadband grant programs, policymakers should consider the following lessons:

- 1. Encourage partnerships between grantees and local institutions, such as schools, community colleges, free tax preparation sites, and responsive ISPs, to reach eligible households and streamline the enrollment process.
- 2. Prioritize funding for organizations with deep ties to and trust within the communities they serve, as they are best positioned to conduct effective outreach and enrollment. Also consider the additional resources, such as in-person translators, allowing community organizations to prefer ISPs that provide support to facilitate in-language and in-person support for enrollment events, and translated information materials required to engage with non-English speaking populations.
- 3. Support the development and implementation of outreach tools that do not require an existing internet connection, such as mailings, ethnic media advertising or SMS-based eligibility screening, to improve the efficiency and effectiveness of outreach efforts.
- 4. Consider the varying timelines and capacities of different organizations when designing grant programs and setting deadlines.
- 5. Consider the negative impact of abruptly ending or changing program rules on grantees and the communities they serve, as this can lead to wasted resources, diminished trust, and reduced program effectiveness.
- 6. Developing a specialized communication and coordination platform tailored for ACP grant recipients and stakeholders which can facilitate data sharing alongside project updates and best practices. This platform can serve as a centralized hub for exchanging information among recipients to ensure alignment and minimize duplication of efforts.
- 7. Embrace more comprehensive outreach strategies that do not simply focus on on-the-spot in-person completion of enrollment. Develop grant evaluation metrics that consider the benefits of broad outreach campaigns.



## **About the project**

This study is part of the Measuring the Effectiveness of Digital Inclusion Approaches (MEDIA) project, a research program that seeks to analyze broadband inclusion initiatives and provide evidence-based recommendations on how best to connect low-income households to broadband on a sustainable basis. The project is supported by The Pew Charitable Trusts and includes the California Emerging Technology Fund (CETF) as a key research partner. The views expressed herein are those of the author(s) and do not necessarily reflect the views of The Pew Charitable Trusts or the California Emerging Technology Fund.

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