



CONNECT ILLINOIS

Public Comment Draft: Initial Proposal Vol 2

Broadband Equity, Access, and Deployment (BEAD)

September 2023



Illinois
Department of Commerce
& Economic Opportunity
OFFICE OF BROADBAND
JB Pritzker, Governor



UNIVERSITY OF ILLINOIS SYSTEM

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Introduction

Illinois Office of Broadband has drafted the following document to meet the requirements for Volume 2 of the Broadband Equity, Access, and Deployment (BEAD) Initial Proposal:

Requirement 1 – Outline of long-term objectives for deployment, equity, economic growth, and job creation

Requirement 2 – Identification and outline supporting and coordinating with local, Tribal and regional in planning and ongoing deployment efforts

Requirement 4 – Description and certification of local coordination

Requirement 8 – Detailed description of deployment subgrantee selection, including:

- Description of subgrantee selection and scoring approach
- Define which project areas where projects will be solicited, describe how universal coverage will be insured in subsequent funding rounds, and describe proof of tribal government's consent for planned projects
- Outline of process for identifying Extremely High Cost Per Location Threshold and how process will be used in subgrantee selection
- Description of how Illinois will ensure prospective subgrantees meet minimum requirements outlined in the BEAD NOFO

Requirement 9 – Description of fair and open non-deployment subgrantee selection

Requirement 10 – Description of initiatives that implement without making a recipient a subgrantee and reasoning

Requirement 11 – Description of how Illinois will integrate labor standards and projections into requirements of prospective subgrantees

Requirement 12 – Description of how Illinois and subgrantees will ensure an available, diverse, and highly skilled workforce

Requirement 13 – Description and certification how Illinois will recruit, use and retain minority businesses, women-owned business enterprises (WBEs), and labor surplus area firms

Requirement 14 – Identification of steps to reduce costs and barriers to deployment

Requirement 15 – Description of Illinois climate threats and proposed mitigation methods

Requirement 16 – Description of low-cost service options and middle-class affordability plan and certification that all subgrantees will participate in the Affordable Connectivity Program or any successor program

Requirement 17 – Description of the planned use of the 20 percent of total funding allocation and certification that Illinois will adhere to BEAD program requirements, if any

Requirement 18 – Description of Illinois Office of Broadband’s regulatory approach, identifying which laws will or will not be waived

Requirement 19 – Certification of Illinois’s intent to comply will requirements of BEAD program and description of subgrantee accountability procedures

Requirement 20 – Description of a middle-class affordability plan

Illinois will incorporate any guidance received from the National Telecommunications and Information Association (NTIA) on this draft of Volume II of the BEAD Initial Proposal to ensure compliance with the BEAD requirements, as enabled by existing provisions,

Following a 30-day public comment period, and review and consideration of received comments, Illinois Office of Broadband plans to submit this document to NTIA, in partial fulfillment of the BEAD Initial proposal requirements.

Objectives (Requirement 1)

Req 2.1.1 Text Box: Outline the long-term objectives for deploying broadband; closing the digital divide; addressing access, affordability, equity, and adoption issues; and enhancing economic growth and job creation. Eligible Entities may directly copy objectives included in their Five-Year Action Plans.

As suggested by BEAD Initial Proposal guidance, the following section is directly copied from the Five-Year Action Plan¹.

Illinois's goals and objectives for broadband deployment and digital equity are aligned to its three core vision statements:

- a. Ensure universal access to high-speed broadband that is affordable, reliable, and fully scalable
- b. Leverage new and existing resources for adoption through targeted digital inclusion strategies and sustainable broadband equity outcomes
- c. Empower all Illinoisans to utilize and participate fully in an increasingly digital economy and society

This section aligns to the Strategy and Objectives section (2.3) of the Illinois State Digital Equity Plan, hereinafter known as the "IL SDEP." Table 1 below details the objectives the state hopes to achieve by implementing either the IL BEAD Plan or the IL SDEP. The IL BEAD Plan is expected to focus on broadband deployment and infrastructure, while the IL SDEP is expected to focus on activities related to digital equity and on the implementation of digital equity and inclusion programming across Illinois.

¹ [CONNECT ILLINOIS Five-Year Action Plan](#), August 2023

Table 1. Illinois’s Goals and Objectives for Broadband Deployment and Digital Equity

Goal	Objective	KPI	Baseline	2030 target	Area ²
A1. By 2030, ensure universal access to affordable, reliable, fully scalable high-speed internet service of at least 100/20 Mbps for all Illinois residences and businesses	A1a. All Illinoisans have access to at least 100/20 Mbps reliable high-speed internet by 2030.	# unserved IL BSLs	~235K BSLs (6%) ³	0 (0%)	Broadband Access
		# underserved IL BSLs	~132K BSLs (3%) ⁴	0 (0%)	Broadband Access
	A1b. All Illinoisans have access to at least 100/20 Mbps fully scalable high-speed internet by 2030.	% IL BSLs with access to fiber	35% ⁴	95%	Broadband Deployment
	A1c. All Illinoisans have access to at least 100/20 Mbps affordable high-speed internet by 2030. ⁵	% IL BSLs with access to at least one affordable internet plan (less than \$50/month) ⁶	77% ⁷	100%	Broadband Affordability
	A1d. All Illinoisans have access to at least 100/100 Mbps fully scalable high-speed internet by 2035.	% IL BSLs with access to 100/100 Mbps	42% ⁸	80%	Broadband Deployment
A2. By 2030, ensure that every CAI has access to at least 1 Gigabit symmetrical broadband service ⁹	A2a. All Illinois schools, libraries, and public health-related entities have at least 1 Gbps symmetrical broadband service by 2030.	% schools, libraries, and public health-related entities with access to 1 Gbps symmetrical+ internet	To be detailed in Initial proposal	100%	Broadband Access
		% other CAIs with access to 1 Gbps symmetrical+ internet	To be detailed in the Initial proposal	100%	Broadband Access
	A2b. Expanded availability of public Wi-Fi throughout the state	# counties that have access to five public Wi-Fi hotspots	31 ¹⁰	102	Broadband Access

² [Five-Year Action Plan Guidance](#)

³ Combines the underserved and served BSLs in Illinois; FCC Broadband Maps accessed June 8, 2023

⁴ FCC Broadband Maps accessed June 8, 2023

⁵ To achieve this objective, two things must be true: (1) a provider with an affordable option is present, and (2) consumers must be able to access the service.

⁶ Based on the definition in the [BAC Affordability Study](#) as either \$10/month or \$25/month

⁷ Provider and speed distribution based on FCC Broadband Maps, Nov 2022. Internet price based on secondary research

⁸ Combines the underserved and served BSLs in Illinois; FCC Broadband Maps accessed 2023

⁹ Based on BEAD NOFO, CAI (“community anchor institution”) means an entity such as a school, library, health clinic, health center, hospital or other medical provider, public safety entity, institution of higher education, public housing

¹⁰ Data from the [Drive Up Wi-Fi Hotspots](#) map maintained by the IOB and IBL

Illinois’s goals and objectives for broadband deployment and digital equity are aligned to its three core vision statements:

- a. Ensure universal access to high-speed broadband that is affordable, reliable, and fully scalable;
- b. Leverage new and existing resources for adoption through targeted digital inclusion strategies and sustainable broadband equity outcomes;
- c. Empower all Illinoisans to utilize and participate fully in an increasingly digital economy and society.

This section aligns to the Strategy and Objectives section (2.3) of the Illinois State Digital Equity Plan, hereinafter known as the “IL SDEP.” Table 2 below details the objectives the state hopes to achieve by implementing either the IL BEAD Plan or the IL SDEP. The IL BEAD Plan is expected to focus on broadband deployment and infrastructure, while the IL SDEP is expected to focus on activities related to digital equity and on the implementation of digital equity and inclusion programming across Illinois.

Table 2. Illinois’s Goals and Objectives for Broadband Deployment and Digital Equity

Goal	Objective	KPI	Baseline	2030 target Area ²	
B1. Achieve universal digital literacy, including basic awareness of online privacy and cybersecurity, focusing on covered populations	B1a. Improved adoption rates both overall and for each covered population	% difference in broadband adoption between covered and non-covered populations	26pp gap between those with incomes <150% FPL and rest of the population ¹¹	0%	Broadband Adoption, Digital Equity
	B1b. Increased # of Illinoisans using internet-ready devices	% Illinoisans using computer, laptop, or tablet device	74% for computer/laptop computer ¹²	90%	Broadband Adoption, Digital Equity

¹¹ ACS 5-Year Estimates Public Use Microdata Sample 2021; additional details in Section 3.4.5.1

¹² Share of Illinoisans over the age of three who responded that they use a desktop computer, laptop, or tablet on the [NTIA Internet Use Survey 2021](#)

Goal	Objective	KPI	Baseline	2030 target	Area ²
	B1c. All Illinoisans possess the digital skills required to participate in the digital economy.	% digital literacy rate, overall and for covered populations	To be detailed in the state digital equity plan	90%	Broadband Adoption, Digital Equity
	B1d. Increased number of digital navigator programs	# digital navigator programs offered across the state	To be detailed in the state digital equity plan	102	Broadband Adoption, Digital Equity
	B1e. Increased local government and communities engaged on digital equity topics	# counties with participants in statewide broadband-related programming	38 ¹³	102	Broadband Adoption, Digital Equity
	B1f. Decreased broadband hesitancy due to privacy/cybersecurity concerns	% residents who are very or somewhat often worried about the privacy or security of their personal data	To be detailed in the state digital equity plan ¹⁴	10%	Broadband Adoption, Digital Equity
B2. Ensure that all Illinoisans, including members of covered populations, have access to affordable subscriptions, devices, and tech support	B2a. Increased % of Illinoisan households with access to internet-ready devices	% households with access to desktop or laptop computers	79% ¹⁵	90%	Broadband Adoption, Digital Equity
	B2b. Decreased % of households without enough devices	% households that need more computing devices to allow each member to connect to the internet	To be detailed in the state digital equity plan ¹⁶	10%	Broadband Adoption, Digital Equity
	B2c. Increased enrollment in ACP (Affordable Connectivity Program) among Illinois households	ACP uptake rate	24% ¹⁷	50%	Broadband Affordability

¹³ Estimated based on counties with a participating organization in Round 1 or Round 2 of the Illinois Connected Communities or Accelerate Illinois and Broadband Breakthrough

¹⁴ Based on IBL Stakeholder Survey responses to the question, “How often, if at all, have you ever experienced any of the following?”

¹⁵ U.S. Census, [ACS 2021 5-Year Estimates](#)

¹⁶ Data to be collected based on IBL Broadband and Digital Equity Survey question, “Does your household need more computing devices, such as a laptop or tablet computer, to allow each person to connect to the internet as needed?”

¹⁷ Calculated with data from [Estimating participation in the Affordable Connectivity Program \(ACP\)](#), Dec 2022 and [USAC ACP Enrollment and Claims Tracker](#), Dec 2022

Goal	Objective	KPI	Baseline	2030 target Area ²	
B3. Ensure that every student, school, and district within Illinois participates in a sustainable one-to-one initiative	B3a. All IL students and teachers have access to reliable internet and internet-capable devices	% students with access to reliable internet and devices	To be detailed in the state digital equity plan	90%	Broadband Access, Digital Equity
		% teachers with access to reliable internet and devices	To be detailed in the state digital equity plan	90%	Broadband Access, Digital Equity
	B3b. Increased % of IL school districts offering 1 Mbps/student	% IL school districts at 1 Mbps/student	68% ¹⁸	90%	Broadband Access, Digital Equity
	B3c. Increased % of IL school districts providing one device per student by 2030	% IL school districts with a one-to-one program	79.8% ¹⁹	90%	Broadband Adoption, Digital Equity
	B3d. Increased % of IL school districts offering parent/caregiver training on technology and remote learning	% IL schools offering tech training to parents/caregivers	85% ²⁰	90%	Broadband Adoption, Digital Equity
B4. Increase the use of broadband services to facilitate aging in place	B4a. Increased % of Illinoisans using internet-ready devices	% Illinoisans over 65 using computer, laptop, or tablet computer	61% computer/tablet ²¹	80%	Broadband Adoption, Digital Equity
	B4b. Illinoisans over 65 possess the digital skills required to participate in society and the digital economy.	% digital literacy rate among the over-60 population	To be detailed in the state digital equity plan	5%	Broadband Adoption, Digital Equity
	B4c. Increased # Illinoisans over 60 participating in the Illinois Care Connections (ICC) program	# Illinoisans over 60 referred and approved for technology bundles	~1,901 ²²	To be detailed in the state digital equity plan	Broadband Adoption, Digital Equity

¹⁸ [Connect K-12](#)

¹⁹ [2020 Illinois School District Technology Survey](#), Learning Technology Center of Illinois in collaboration with the Illinois State Board of Education

²⁰ [2020 Illinois School District Technology Survey](#), Learning Technology Center of Illinois in collaboration with the Illinois State Board of Education

²¹ Share of Illinoisans over the age of 65 who responded that they use a desktop computer, laptop computer, or a tablet on the [NTIA Internet Use Survey 2021](#)

²² [A Report on the Illinois CARE Connections Program](#), August 2021

Goal	Objective	KPI	Baseline	2030 target	Area ²
	B4d. Reduced social isolation and loneliness ²³	% “less lonely” rating among aging participants in the ICC Program	37% ²⁴	90%	Broadband Adoption, Digital Equity
C1. Accelerate the use of digital agriculture applications across rural Illinois	C1a. All farms in IL have access to high-speed internet.	% IL farms with access to internet	90% ²⁵	100%	Economic Growth and Job Creation, Digital Equity
	C1b. Increased implementation of precision agriculture use cases	# farms implementing precision agriculture applications	To be detailed in the state digital equity plan	to be detailed in the SDEP	Economic Growth and Job Creation
C2. Expand broadband-powered opportunities for inclusive workforce development in communities throughout Illinois, with a focus on covered populations	C2a. Scaled education and training programs for skill development for the tech-related occupations	# participants trained for IT occupations	To be detailed in the state digital equity plan	to be detailed in the SDEP	Economic Growth and Job Creation
	C2b. Increased number of Illinoisans that can work from home	% Illinoisans over 15 years old working remotely via the Internet	32% ²⁶	to be detailed in the SDEP	Economic Growth and Job Creation
	C2c. Scaled education and training programs to develop skills for the broadband industry	# participants trained for broadband-related occupations	To be detailed in the state digital equity plan	to be detailed in the SDEP	Economic Growth and Job Creation
C3. Expand access to broadband-powered health-related services for covered populations to provide additional healthcare options to communities throughout Illinois. Services include but are not limited to	C3a. Higher utilization of and satisfaction with remote healthcare among prioritized populations	% population that use telehealth	To be detailed in the state digital equity plan	90%	Economic Growth and Job Creation, Digital Equity
		% population satisfied with telehealth	To be detailed in the state digital equity plan	80%	Economic Growth and Job Creation, Digital Equity

²³ Adapted from the Illinois Department of Aging’s [State Plan on Aging FY2022-FY2024](#)

²⁴ [Reducing Social Isolation Through Technology: A Report on the Illinois CARE Connections Program, August 2021](#)

²⁵ Figures for farms with internet access, from USDA Farm Computer Usage and Ownership, 2021. Note: Speed data not available

²⁶ [Working Remotely via the Internet](#), Age 15+ Persons Who Use the Internet, November 2021, NTIA Internet Use Survey

Goal	Objective	KPI	Baseline	2030 target Area ²	
telehealth, telemetry, and remote surgery.					
C4. Expand usage of digital manufacturing applications for small businesses and/or develop use cases for intelligent transportation and smart logistics in regions with the most need	C4a. Increased adoption of advanced manufacturing technologies	% manufacturers that currently implement advanced manufacturing technology	36.9% ²⁷	90%	Economic Growth and Job Creation
	C4b. Improved safety and efficiency of transportation infrastructure in Illinois	# intelligent transportation systems (ITS) projects across Illinois ²⁸	To be detailed in the state digital equity plan	To be detailed in the state digital equity plan	Economic Growth and Job Creation
	C4c. Increased adoption of intelligent transportation system (ITS) technology	# pilot programs or projects out of the Illinois Autonomous and Connected Track (I-ACT)	To be detailed in the state digital equity plan	To be detailed in the state digital equity plan	Economic Growth and Job Creation

²⁷ [How Illinois Manufacturers Are Adopting Advanced Technologies: An Insight Report on Automation, Workforce, and Productivity](#), Illinois Manufacturing Excellence Center

²⁸ Intelligent transportation systems can be defined as “the integrated application of sensor, computer, electronics, and communications technologies and management strategies to provide traveler information to increase the safety and efficiency of the surface transportation system,” [Illinois Statewide ITS Strategic Plan](#), 2019

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

Req 2.2.1 Text Box: Identify and outline steps that the Eligible Entity will take to support local, Tribal, and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide. In the description, include how the Eligible Entity will coordinate its own planning efforts with the broadband planning processes of local and Tribal Governments, and other local, Tribal, and regional entities. Eligible Entities may directly copy descriptions in their Five-Year Action Plans.

As suggested in the BEAD guidance, this section is directly copied from Illinois' Five-Year Action Plan.

Prior to the creation of the IL BEAD Plan and the SDEP, through their programming and activities the Illinois Office of Broadband (IOB) and Illinois Broadband Lab (IBL) have worked to engage key stakeholders. The IOB's Broadband Advisory Council includes representation from various internet service providers, state agency officials and legislators, and certain broadband-related stakeholders. It convenes quarterly.²⁹ The IOB and IBL's Broadband READY program has 10 cohorts aligned to each Economic Development region in the state. This program is designed to identify current digital inequities and to set next steps in creating a digital inclusion ecosystem. This system would be created in regional cooperation with community and economic-development organizations, educators, local leaders, and other related stakeholders.³⁰

Additionally, the IOB's Accelerate Illinois program encourages community-driven broadband expansion by providing grants and communities with expert consultation.³¹ The IOB's Illinois Connected Communities program engages communities in a cohort forum to provide best practices, expert consultations, and grants.³²

²⁹ [Illinois Broadband Advisory Council](#), Department of Commerce and Economic Opportunity

³⁰ [Broadband READY](#), Department of Commerce and Economic Opportunity

³¹ [Accelerate Illinois](#), Department of Commerce and Economic Opportunity

³² [Illinois Connected Communities](#), Department of Commerce and Economic Opportunity

The IOB keeps stakeholders updated through regular webinars and newsletters, which are produced and distributed in collaboration with the Illinois Extension and the Benton Institute, respectively.

The IOB has undertaken comprehensive stakeholder engagement efforts in preparation for broadband deployment programming. The IOB has previously done the same for the development of its 2020 initial strategic plan and for the Connect Illinois Broadband Grant Program.

To create the IL BEAD Plan and the SDEP, the Illinois Office of Broadband's stakeholder engagement process includes listening to, understanding, and collaborating with a broad range of broadband and digital equity stakeholders to: (1) assess and understand broadband needs and barriers, (2) inventory and map existing broadband assets, and (3) learn what works and co-create new solutions.³³ The IOB aims to meet four objectives by engaging key stakeholders:

1. Understand the experiences and perspectives of affected groups to inform the BEAD and State Digital Equity plans
2. Communicate the facts about the federal funding opportunity ahead, the work already being done by the Office of Broadband and the Illinois Broadband Lab to progress towards goals, and the work ahead
3. Enable current partners and build new partnerships with key stakeholders who are committed to the mission of equitable and inclusive broadband access
4. Build long-term capacity for all impacted communities and key stakeholders through support, transparency, and feedback.

Illinois plans to engage five stakeholder groups based on the groups detailed in the BEAD Notice of Funding Opportunity³⁴ during the stakeholder engagement process: (1) government entities, including local government bodies and state agencies; (2) service providers; (3) other private

³³ [Core Team Meeting](#), January 2023

³⁴ [Broadband Equity, Access, and Deployment Program Notice of Funding Opportunity](#)

companies, including small businesses; (4) non-profits and community organizations; and (5) residents and the organizations that serve them, with a focus on covered populations.

To identify organizations and entities to target and engage throughout the stakeholder engagement process, the IOB and IBL plan to identify and catalog their existing partners and supporters throughout the state. These partners and supporters include persons and organizations who have previously engaged with the Illinois Broadband Lab during webinars or existing programming.

During the stakeholder engagement planning process, the IOB and IBL plan to review distribution of covered populations and broadband metrics (Figure 1) to understand the diversity of Illinois’s regions before engagement begins. The Northeast and Northern Stateline regions have relatively high proportions of individuals with low rates of English literacy, racial minorities, immigrants, and Indigenous persons. The Southern region has low rates of broadband adoption and access to devices, as well as relatively high proportions of unserved broadband serviceable locations (BSLs), individuals with incomes less than 150% of the poverty line, individuals with disabilities, and veterans. The Southeast region has low broadband adoption rates and relatively high proportions of unserved BSLs, individuals with disabilities, and aging individuals.

Broadband metrics	Share of each covered population as a proportion of total regional population										
	Unserved	Broadband adoption ¹	Access to devices	Income less 150% of FPL	Aging ind. (60+)	Veterans	Ind. with disabilities	Ind. with low English literacy	Racial & ethnic minorities ²	Immigrants	Rural
Northeast	1%	76%	82%	18%	21%	4%	10%	11%	52%	19%	0%
Northern Stateline	7%	68%	75%	23%	25%	8%	14%	4%	32%	8%	10%
Northwest	8%	63%	73%	20%	28%	8%	14%	3%	20%	4%	36%
North Central	7%	67%	76%	20%	24%	5%	12%	2%	20%	4%	24%
East Central	9%	65%	78%	24%	22%	6%	11%	4%	29%	8%	22%
Central	8%	63%	71%	21%	26%	8%	14%	1%	19%	2%	44%
West Central	15%	60%	70%	23%	27%	4%	15%	1%	14%	2%	46%
Southeast	22%	58%	70%	22%	26%	6%	16%	1%	9%	1%	100%
Southern	22%	49%	64%	28%	26%	5%	19%	1%	15%	2%	67%
Southwest	9%	68%	75%	18%	24%	20%	14%	1%	26%	2%	23%
Illinois average	6%	72%	79%	19%	22%	5%	11%	9%	42%	14%	11%

Legend¹
■ Top 2 highest proportions
■ Above population median
■ Below population median

1. For broadband adoption and devices access: darkest color indicates lowest proportions, middle color indicates below state average, and light grey indicates above state average
2. Includes Black or African American, American Indian and Alaskan Native, Asian, Native Hawaiian and other Pacific Islander, Some other race, Two or more races, and Hispanic populations
Covered populations excluded: Justice-impacted individuals, LGBTQ+ individuals, women, and rural residents
Units used for analysis: BSLs: unserved; Households: broadband adoption and access to devices; Individuals: all covered populations
Source: US Census 2021 ACS 5-Year, FCC Maps

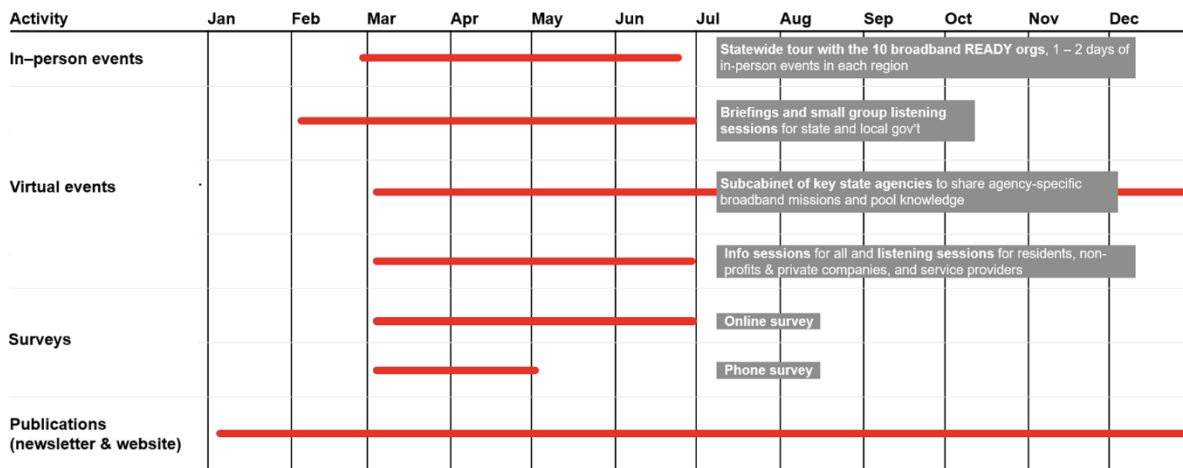
Figure 1. Summary statistics on broadband metrics and covered populations across the 10 regions of Illinois

To engage members of these stakeholder groups, Illinois plans to take on a multi-channel stakeholder engagement process that builds on existing frameworks within the state (Figure 2). This multi-channel effort has begun by engaging one-one-one with local legislators and by conducting conversations and briefings on current broadband efforts across Illinois with local government officials. The State of Illinois plans to invest in activities across multiple modalities to facilitate an inclusive stakeholder engagement process that brings in as many stakeholders as possible from covered populations that have historically been excluded from state planning.

To engage stakeholders from across Illinois, outreach across the following channels is planned during the development of the IL BEAD Plan and IL SDEP:

- **In-person events.** Through a statewide listening tour, several stakeholder groups—including residents, non-profits, community organizations, small businesses, and local governments—will be invited to participate in in-person listening sessions held within local Illinois communities.
- **Virtual events.** State government agencies plan to be engaged through a working group. The state government’s broadband subcabinet working group, or the State Government Broadband Working Group, was established at the beginning of the stakeholder engagement process. The broadband subcabinet will meet regularly to discuss the federal funding opportunity and to engage agency leaders with a stake in closing the digital divide. Local governments can also choose to participate in small-group listening sessions. Individual conversations with legislators and local government leaders will be hosted by the Director of the IOB. Briefings on the IOB and IBL for local government governing bodies (such as city councils and county boards) will be offered to local governments as a follow-up to one-on-one conversations. Additionally, virtual listening sessions for key stakeholder groups will provide updates on the Office of Broadband’s and Illinois Broadband Lab’s activities and gather feedback on digital equity and broadband-related experiences. The State plans to host four virtual listening sessions to target four groups: residents, local organizations, internet service providers, and residents who speak Spanish.

- Surveys.** The IOB and IBL plan to administer surveys by phone and online. The online survey is expected to be available to members of all stakeholder groups so they can participate in and report on their experience in deploying, using, and promoting broadband. The phone survey will be aimed at Illinois residents, with a goal of 2,500 resident responses. Additionally, the state plans to administer a survey specifically for community anchor institutions (CAIs) to understand their connectivity and how they provide broadband access to the community. Another survey will specifically target public housing authorities (PHAs) to understand the challenges, barriers, and benefits related to broadband access for covered households.
- Publications.** The new Illinois Broadband Lab website and social media platform will be launched to disseminate information about stakeholder engagement efforts and updates on the federal funding application process. Additionally, the bi-weekly “Illinois Broadband Connections” newsletter produced by the Benton Institute in partnership with the Office of Broadband will include updates on stakeholder engagement efforts.



Note: current plan as of 02/23/23. Timeline and plan are subject to change.

Figure 2. The IOB and IBL plan to launch a multi-channel stakeholder engagement process during the drafting of the IL BEAD Plan, and to continue engaging with stakeholders once the IL BEAD Plan is complete.

The express goal of the in-person listening sessions and phone survey is to reach stakeholders that may not have access to broadband currently, as well as to engage residents, non-profits, and community organizations within their communities. In-person outreach was organized to

engage the Illinois Department of Commerce’s Economic Development Regions, which cover all 102 counties in the state. To reduce the burden on community organizations and partners, and to build upon existing community infrastructure, the in-person resident and non-profit engagement efforts are planned around the Economic Development Regions in Illinois. In each region, an existing Broadband READY program is housed under the Office of Broadband. Resident and non-profit engagement events will be planned by the Illinois Broadband Lab in partnership with the Broadband READY team, local government representatives, the University of Illinois Extension, and local organizations. Through these partnerships, Illinois hopes to build upon existing broadband-related efforts in the community and to engage stakeholders through organizations they are familiar with.

The IL BEAD Plan will incorporate the voices heard in stakeholder engagement activities into the following sections of the IL BEAD Plan: (1) 3.2 – Partnerships, (2) 3.3 – Asset Inventory, (3) 3.4 – Needs and Gaps Assessment, (4) 4.0 – Obstacles and Barriers, and (5) 5.7 – Alignment. Throughout engagement with various stakeholders, the state will note major concerns, needs, and gaps related to broadband equity throughout the state of Illinois. Additionally, the state will record existing, ongoing community and local efforts across the state that are related to broadband deployment, access, and equity that contributed to the IL BEAD Plan. The findings from stakeholder engagement efforts conducted as a part of this Five-Year Action Plan will also be used as key inputs for the State Digital Equity Plan.

This IL BEAD Plan was drafted in Spring 2023, and stakeholder engagement events are expected to continue until Summer 2023. Reflections from residents, local organizations, and local governments in all 10 regions of Illinois are not included in this report but will be included in the IL SDEP. They will also inform the Initial Proposal.

The Illinois Office of Broadband and the Illinois Broadband Lab plan to continue their stakeholder engagement efforts through channels established prior to current efforts. For example, the Illinois Office of Broadband convenes the Broadband Advisory Council quarterly. This council includes representatives from various internet service providers, state agency officials and legislators, and certain broadband-related stakeholders. Additionally, the Illinois Office of Broadband plans to continue its State Government Broadband Working Group. Through this

group, the State of Illinois plans to monitor the implementation of the IL BEAD Plan to ensure that digital services meet constituents’ needs throughout the state. The Illinois Broadband Lab’s website and the Office of Broadband’s newsletters, which are published in partnership with the Benton Institute for Broadband & Society, will continue to be disseminated and updated regularly.

The Illinois Broadband Lab and Broadband READY teams plan to continue working with the local partners who participated in the stakeholder engagement process. The regional Broadband READY teams will be included throughout the stakeholder engagement process so that local partners can be involved throughout and after the implementation of the IL BEAD Plan. Local Coordination (Requirement 4)

Req 2.3.1 Text Box: Describe the coordination conducted, summarize the impact such coordination has on the content of the Initial Proposal, and detail ongoing coordination efforts. Set forth the plan for how the Eligible Entity will fulfil the coordination associated with its Final Proposal.

From March to June this year, the IOB and Illinois Broadband Lab hosted over 50 listening sessions and town hall meetings in over 20 communities to better understand the challenges residents, community organizations, and local governments face in accessing reliable internet services. Below is a table summarizing the stakeholder engagement tour conducted.

Table 3. Overview of 10-Region Stakeholder Engagement Tour with planning partners, events, and attendees by region as of June 2023

Region	Dates	Host sites	Number of attendees	Example CAIs and non-profits represented
Southern	3/1 – 3/2	Shawnee Community College, SIU Carbondale	90-100	Agriculture, government representatives; economic development organizations, education non-profits
Southwest	3/15 – 3/16	SIU East St. Louis, Kaskaskia College	90-100	Agriculture, government representatives, local non-elected leaders, education organizations/schools
Southeast	3/22	Effingham Extension Office	30-40	County Farm Bureaus (Richland, Effingham, Clay, and Jasper), Illinois Extension,

Region	Dates	Host sites	Number of attendees	Example CAIs and non-profits represented
				County Boards (Effingham, Jasper, and Bond), City of Effingham
East Central	4/12 – 4/13	Champaign Farm Bureau, Danville Area Community College	90-100	Parkland College, Champaign County Board, High Speed for Edgar County, Urbana-Champaign Big Broadband Danville Area Community College, high schools
Northeast – City of Chicago	4/19, 5/3, 5/10	City of Chicago – City Hall, Malcolm X College, Steinmetz College Prep High School, Urban League Chicago	170-180	UChicago Internet Equity Initiative, scaleLIT, YMCA of Metro Chicago, Chicago Urban League, Women Employed, The Northwest Center, Teamwork Englewood, Latinos Progresando, Puerto Rican Cultural Center, Southwest Organizing Project, Project Exploration, Literacy Works, ChiCommons LWCA, Black Star Project
Northeast – Aurora, Libertyville, Kankakee, Joliet, Sugar Grove	5/18, 5/24, 5/25, 5/31,	Waubonsee Community College, Lake County Health Department, Kankakee Public Library, Joliet City Council	180-190	City of Aurora IT Department, Waubonsee Community College Faculty, local government representatives, U.S. Department of Commerce employee, NTI Network Technologies
Central – Springfield, Decatur	4/25 – 4/26	Macon County Extension Office, Lincoln Library, Innovate Springfield	110-120	IL Heartland Library System, Heritage Behavioral Health Center, Faith Coalition for Common Good, IMC Illinois Migrant Council, government representatives
West Central - Macomb	5/3	Macomb City Hall	80-90	Rushville Public Library, Western Illinois University, Memorial Hospital, University of Illinois Extension, Catch a Star Learning Center, government representatives

Region	Dates	Host sites	Number of attendees	Example CAIs and non-profits represented
Northern Stateline	5/23	Rockford Public Library, Region 1 Planning Council	10-20	Local government representatives, University of Illinois Extension, UD Department of Commerce
Northwest – Moline, Morrison	5/9 – 5/10	Rock Island Casino, WIU Quad Cities, Morrison Institute of Technology	50-60	Western Illinois University, Henry County Farm Bureau, Highland Community College, government representatives
North Central	5/16 – 5/17	Milner Library, Manual High School, Glen Okay Community Learning Center	110-120	Government representatives, Normal Public Library, Illinois State University, Farm Bureaus (McLean County, Peoria County), Peoria Public School, Manual High School
Statewide	3/14, 4/21, 4/28, 5/4, 5/9, 5/23	Virtual	170	Illinois Farm Bureau, Illinois Capital Development Board, Illinois State University, North Park University Library

Through the listening tour, the Office of Broadband gathered feedback from residents, community-based organizations, and local officials to inform the drafting of the Five-Year Action Plan, the State Digital Equity Plan, and the Initial Proposal. The following is a summary of the some of the feedback received, and their impact on the Initial Proposal drafting:

- Attendees from various regions stated that Internet subscriptions were still unaffordable to them despite existing subsidies, in part due to the high cost of the subscriptions and in part due to the high cost of the devices that are necessary to access the Internet.

In response to this, the IOB has adopted the example low-cost service plan supplied by the NTIA, thus ensuring that all providers receiving BEAD funds will offer affordable options to consumers. Additionally, the IOB assigns substantial weight to affordability in the scoring rubric for subgrantee selection to encourage providers to offer middle-class households affordable plans for high-speed internet.

- Attendees—particularly those living in high-density, residential buildings in Chicago—reported experiencing bandwidth limitations that have interrupted service.
- In response to this, the IOB included an “area challenge” in the challenge process and adopted the pre-challenge modification, which redesignates served MDUs that are unlikely to have high-speed internet as “underserved.” This change shifts the burden of proof to providers and ensures that the broadband map accurately reflects service availability in MDUs. Subsequently, it ensures that unserved locations and undeserved MDUs will be able to receive BEAD funding.
- Attendees from rural areas reported either having no access or access to one provider with unreliable service.
- The Office of Broadband is aware that certain areas of Illinois—for example, rural areas in Southern and Southeast Illinois—lack broadband infrastructure.³⁵ Ensuring that every unserved location is connected via BEAD funds is a top priority for the Office. Therefore, as outlined in Req. 2.4.3 of this Initial Proposal, the IOB plans to (1) increase the reference price in hard-to-serve areas, and (2) award higher points for hard-to-reach locations to encourage providers' participation in these areas.
- Some attendees reported access only to dated technologies that do not offer speeds high enough for more than one person.
- As a response, the IOB adopted the DSL modification and redesignated all DSL locations as "underserved" to facilitate the phase-out of legacy copper facilities and to ensure the delivery of "future-proof" broadband service.
- Many attendees emphasized the need for digital learning opportunities and digital skills programs.

³⁵ [Connect Illinois Five-Year Action Plan](#), Section 3.4.1. Needs and Gaps Assessment, Broadband Deployment

Although the Office of Broadband does not anticipate having additional BEAD funds left to address this, it intends to use digital equity funds to ensure that digital learning and skills development opportunities are available to Illinois residents.

Following an ambitious, 54-stop, statewide listening tour, and after drafting the resulting Five-Year Action Plan, the IOB and the Illinois Broadband Lab will facilitate engagement opportunities throughout the fall to garner additional feedback and to update all stakeholders on the latest planning and preparations for receiving funding from BEAD and Digital Equity program, which is expected to begin in 2024. The state intends to do the following:

- BEAD Challenge process. The state plans to reach out to relevant participants through multiple channels. Examples include emails to stakeholders, promotion on IBL and IOB websites, promotion through the bi-weekly newsletter. The state will also host virtual information sessions for Q & A.
- Provider engagement. Meeting the goal of universal broadband access would be impossible without the participation of Illinois's broadband providers. The state will continue to seek providers' input on broadband mapping in general and BSLs in particular. Potential outreach may include: 1) virtual information sessions on BEAD planning, preparations and processes; 2) publication of rules and timeline on IOB's website and other relevant websites; 3) Q & A sessions after rules are published to answer stakeholders' additional questions and concerns.
- Regional stakeholder engagement. The IBL will invite past participants in various broadband-related events that it has held over the past four years—including Illinois Connected Communities, Accelerate Illinois, Broadband Breakthrough, and attendees at the afore-mentioned listening tours—to meetings in each of the state's 10 economic development regions. These meetings will focus on how local governments, community and statewide organizations, and everyday Illinoisans can engage in broadband mapping, the initial design of the digital equity program, and ongoing opportunities for local coordination, planning, and capacity-building.

- In addition to these engagement opportunities, during the BEAD Initial Plan Public Comment period stakeholders may comment on the state’s plans for administering the BEAD challenge process and the grant process.

The state’s local coordination efforts have satisfied the local coordination criteria outlined in the BEAD NOFO.

Full geographic coverage. The IOB and IBL conducted the stakeholder engagement tour in all 10 regions in Illinois. In-person listening sessions were hosted in multiple locations in each region to better cover the region and to allow stakeholders from both rural and urban counties to participate. In addition, the IOB and IBL hosted several virtual listening sessions for stakeholders who were unable to attend in person.

Outreach to diverse groups. The IOB and IBL involved all stakeholder groups suggested by the NOFO in developing the Five-Year Action Plan and Initial Proposal.

- **Public service stakeholders:** During the 10-region stakeholder engagement tour, the Office reached out to local government officials and hosted in-person briefings. The IOB and IBL hosted three virtual sessions for state government agencies. During these sessions, the IOB and IBL provided updates of broadband progress in Illinois, previewed the work to be done, and discussed opportunities for collaboration.
- **Private sector stakeholders:** The IOB and IBL hosted two virtual listening sessions specifically aimed at private-sector stakeholders. In these sessions, the IOB and IBL introduced upcoming opportunities to close the digital divide in Illinois and then opened the floor for providers and private businesses to ask questions, provide feedback, and voice concerns.
- **Community serving stakeholders:** The IOB and IBL reached out to a wide range of community-serving stakeholders through existing listservs and local partner organizations’ listservs. The IOB and IBL hosted at least one resident and one community organization listening session in each of the 10 regions. The IOB also hosted briefings

with umbrella organizations of community anchor institutions, such as the Illinois Library Association.

Multiple awareness mechanisms. The IOB and IBL used multiple mechanisms to raise awareness and encourage participation among various stakeholder groups.

- In-person listening session. As outlined in the beginning of this section, the IOB and IBL hosted over 50 in-person listening sessions in local communities across all 10 regions of Illinois.
- Virtual listening sessions. The IOB and IBL hosted virtual listening sessions for residents, local organizations, local governments, state agencies, internet service providers, and private businesses.
- Informational materials. The IOB and IBL distributed virtual fact sheets and FAQs through many partner organizations, such as the Illinois Library Association and regional broadband READY teams. The Office also distributed printable brochures during the 10-region tour to facilitate dissemination of information among individuals with limited access to digital devices.
- Surveys. The IOB and IBL have conducted online surveys targeting all stakeholder groups as well as phone surveys targeting residents. In addition, the IOB launched surveys specifically for CAIs and PHAs to understand their particular challenges, barriers, and benefits related to broadband access.³⁶
- Publications. A website and social media platforms for the Illinois Broadband Lab have been launched to disseminate information about stakeholder engagement efforts and updates on the federal funding application process.^{37,38} Additionally, the bi-weekly “Illinois Broadband Connections” newsletter produced by the Benton Institute in

³⁶ [Illinois Broadband Lab All Stakeholder Survey](#)

³⁷ [Illinois Broadband Lab Official Website](#)

³⁸ [Illinois Broadband Lab Twitter](#), [Illinois Broadband Lab Facebook](#)

partnership with the Office of Broadband includes updates on stakeholder engagement efforts.³⁹

Transparency. In all of the state’s local coordination efforts, the IOB and IBL have adhered to clear procedures that promote transparency.

- The IOB posted the schedules of all stakeholder engagement events on the IBL website and other relevant websites.^{40,41}
- The IOB periodically reported on broadband efforts to local and community stakeholders through a bi-weekly newsletter³⁹. The state also published a report on the feedback received from the stakeholder engagement tour.⁴²
- The IOB involved a diverse set of stakeholders, as outlined in the section above on outreach to diverse groups.
- The IOB hosted listening sessions specifically for Spanish-speaking individuals and provided a Spanish option for surveys so that residents who speak only Spanish could voice their broadband concerns.

Underrepresented engagement. The IOB and IBL have identified and directly engaged with unserved, underserved, and underrepresented groups in their local coordination efforts.

- IOB and IBL have raised awareness in under-represented communities by using several tools, including: 1) conducting analytics to identify unserved, underserved, and under-represented communities in each region; 2) promoting listening sessions through CAIs that directly reach under-represented communities; and 3) holding listening sessions targeted at residents who speak in Spanish, with Spanish translations of the surveys administered.

³⁹ [Illinois Broadband Connections](#), Benton Institute for Broadband & Society

⁴⁰ [Example of post regarding the listening sessions in Chicago](#). Similar posts were made for all events.

⁴¹ [Illinois Broadband Lab Summer Series schedule](#), Illinois Extension on the University of Illinois Urbana – Champaign website

⁴² [“Statewide Listening Tour Crosses the Finish Line”](#)

- The IOB will further engage with under-represented communities through its various stakeholder engagement plans under the State Digital Equity Plan. The IOB will ensure that stakeholder engagement events conducted for the Digital Equity Plan are well-coordinated to minimize redundancy.

Req 2.3.1.1 Attachment: As a required attachment, submit the Local Coordination Tracker Tool to certify that the Eligible Entity has conducted coordination, including with Tribal Governments, local community organizations, unions and work organizations, and other groups.

See attachment for the Local Coordination Tracker.

Req 2.3.2 Text Box: Describe the formal tribal consultation process conducted with federally recognized Tribes, to the extent that the Eligible Entity encompasses federally recognized Tribes. If the Eligible Entity does not encompass federally recognized Tribes, note “Not applicable.”

Not applicable.

Req 2.3.2.1 Optional Attachment: As a required attachment only if the Eligible Entity encompasses federally recognized Tribes, provide evidence that a formal tribal consultation process was conducted, such as meeting agendas and participation lists.

Not applicable.

Deployment subgrantee selection (Requirement 8)

Deployment Projects Subgrantee Selection Process and Scoring Approach

Req 2.4.1 Text Box: Describe a detailed plan to award subgrants to last-mile broadband deployment projects through a fair, open, and competitive process.

The state of Illinois’s plan for Connect Illinois Round 4 contains multiple elements designed to achieve a fair, open, and highly competitive award process with broad participation. Connect Illinois Round 4 also includes rules that fully implement all Sub-granting Accountability Procedures mandated by NTIA, including for disbursement, claw-back rights, subgrantee reporting, and ongoing monitoring.

A. Project Area Definitions

The following terms are defined for the purposes of this Initial Proposal:

- **“Project area units (PAU)”** are a collection of unserved and underserved locations that will be eligible for inclusion in a provider application. Prospective subgrantees cannot break up a project area unit into a smaller collection of unserved and underserved locations. Project area units will not overlap and will collectively contain all unserved and underserved locations without an enforceable commitment in the state.
- **“Hard-to-serve project area units”** are project area units that considerably lack broadband infrastructure. The IOB will publish the list of hard-to-serve project area units before the subgrantee process, based on (1) the proportion of unserved BSLs, (2) past providers’ interest, (3) outcomes of previous grant rounds (i.e., Connect Illinois Rd 1, Rd 2, and Rd 3; RDOF), and (4) whether the project area units are in Persistent Poverty Counties⁴³.

⁴³ “Persistent Poverty Counties” means any county, including county equivalent areas in Puerto Rico, that has had 20% or more of its population living in poverty over the past 30 years, as measured by the 1990 and 2000 decennial censuses and the 2011–2015 5- year data series

- **“Project area”** is a set of project area units that applicants propose to serve in a subgrantee application. Applicants may pick any number of project area units to form a project area but cannot use any fractional project area unit. Project area units within a project area are not required to be contiguous.
- **“Must-include project area units”** marks the project area units that contain the core buildout necessary to make a potential subgrantee’s project area viable. Potential subgrantees must select which project area units are “must-include” project area units when they submit their application. In the de-conflicting process, applicants whose application’s must-include project area units conflict with a provisional winner’s project area will have the option to withdraw their application.

B. Overview of Connect Illinois Round 4

The BEAD subgrantee process will consist of two waves of application and award and a potential third wave. The first wave (“Wave 1”) will focus on hard-to-serve locations, the second wave (“Wave 2”) will address all remaining locations, and the state will announce whether to conduct a third wave (“Wave 3”) depending on the percentage of the total BEAD allocation provisionally awarded in the first two waves.

Preparation for the subgrantee process. Two months prior to the BEAD subgrantee process, the state will open the pre-qualification filing window for prospective subgrantees. During this filing window, prospective subgrantees must provide their financial, operational, managerial, and technical qualifications as well as submit required certifications and authorizations. Prospective subgrantees that have participated in prior rounds of Connect Illinois will only need to submit the documentation that they have not submitted before. The Office of Broadband will publish more guidance when the state opens the pre-qualification filing window.

Before the start of the subgrantee process, prospective subgrantees will be notified as to whether they have been deemed pre-qualified to participate in Connect Illinois Round 4. The state highly encourages providers to take advantage of the pre-qualification period to streamline

available from the American Community Survey of the Bureau of the Census. Three counties (Alexander, Jackson, and Pulaski County) are categorized as persistent poverty county in 2023 according to [ACS data](#).

their application process, however, prospective subgrantees can also choose to provide their qualifications during the application period.

The state will also publish a set of PAUs and designate hard-to-serve PAUs at least 30 days before Wave 1 of the subgrantee process begins.

Subgrantee process, Wave 1. The initial wave of the subgrantee selection process for BEAD will begin after the approval of Volume 2 of Illinois’s Initial Proposal by NTIA or following the completion of the BEAD challenge process and the publication of a finalized list of unserved and underserved locations as well as community anchor institutions for 60 days, or after the publication of the PAUs and hard-to-serve PAUs for 30 days, whichever is later. At this point, the Office of Broadband will begin accepting applications over a two-week period.

At the end of the two-week submission period, the IOB will process all applications that contain sufficient hard-to-serve PAUs (the state will publish more guidance when publishing the hard-to-serve PAUs). Applicants could submit applications for all available PAUs; however, only applications that meet the hard-to-serve PAU threshold will be considered at this stage of the subgrantee process. In the case that the state does not have sufficient funds available to fund deployment to all unserved, underserved, and eligible CAI locations, this approach would allow state to prioritize unserved projects first as stated in BEAD NOFO.

Applications will be de-conflicted and selected as provisional winners as follows. First, all qualifying applications will be scored using the scoring rubric described below in Section 2.4.2. Next, the state will rank all applications from highest to lowest by score and sequentially choose applications as provisional winners. If a lower-ranking application conflicts with a higher-ranking application, the provider will be notified of the conflict and will have 10 business days to remove the conflicting areas and resubmit their application. Then, the state will re-score the lower-ranking application based on the re-submission. The details of the de-conflicting process are described in Section 2.4.6 below. At the end of the two- to four-week de-conflicting process, the IOB will process all resubmissions and announce provisional winners.

The state will only award a non-priority broad project in “Wave 1” if there are no priority broadband projects covering the same area. Since the state does not have complete information to determine the EHCPLT at this stage of the process, the state will reserve the right to hold off on awarding applications with high BEAD outlay until “Wave 2” of subgrantee process, when the state determines the ECHPLT.

Three potential outcomes are possible at the end of “Wave 1” of Connect Illinois Round 4:

1. An application is selected as the provisional winner.
2. An application is not selected and conflicts with a provisional winner. In this case, the provider of the application that is not selected must reduce the application’s scope to exclude the conflicting area for participation in the next round.
3. An application is not selected and does not conflict with any provisional winner. In this case, the application will be rolled over to the next round automatically; however, the provider will have the option to refine or withdraw their application prior to “Wave 2”.

At the end of Wave 1, the state will assess the remaining BEAD funds available and compare it with the reference cost of the remaining project area units. Based on the comparison, the state will establish a scoring threshold—the goal of which is to evaluate if the state will have enough funds to connect all unserved locations. The lower the remaining funds as compared to the total BEAD allocation, the higher the scoring threshold will be.

The state will establish the scoring threshold but will not make it public at the end of “Wave 1.” The state will use the scoring threshold to determine if “Wave 3” is needed per the following approach: in the evaluation stage of “Wave 2,” if enough applications score above the threshold, the state will make all awards by the end of “Wave 2.” Otherwise, identical to the approach employed in prior Connect Illinois rounds, the state will only award projects that scored above the threshold in “Wave 2” and rest of the applications will be rolled over for evaluation in “Wave 3.”

Subgrantee process, Wave 2. Two weeks after the remaining PAUs are published, the Office of Broadband will then begin accepting applications for “Wave 2” over a two-week period. At the

end of the submission period, the IOB will process all applications, regardless of their hard-to-serve status. The IOB will also determine the EHCPLT by the process described in Req. 2.4.9. The review process will be completed within five weeks. The state will then announce the scoring threshold, and whether the state will run an additional wave.

In the case that "Wave 3" is not needed, over the next four to six weeks, conflicts in applications will be removed and provisional winners selected in the same way as in Wave 1, with one exception: with the EHCPLT determined, the state will only consider the non-priority broadband projects where BEAD outlay per location of fiber projects covering the same area exceeds the EHCPLT, or there is no eligible priority broadband project covering the same area (see Req. 2.4.4, 2.4.9, and 2.4.10 for more details). In parallel, for locations that have received no applications, the state will reach out to providers and subgrantees to directly negotiate incentives to provide coverage (see Req. 2.4.6 for more details).

In case "Wave 3" is needed, the state will resolve conflicts and award provisional winners the same way as above, with the exception that only applications scoring above the threshold will be considered for award in this wave. The state will not conduct direct negotiations with providers and subgrantees until "Wave 3."

Potential outcomes at the end of "Wave 2" of Connect Illinois Round 4 could be:

1. A "Wave 3" is not needed. All applications processed and awards announced.
2. A "Wave 3" is needed.
 - i. For those applications that are selected as the provisional winner. No further action is needed for those applicants.
 - ii. For those applications that are not selected due to scoring below the threshold, the applications will be rolled over to the next wave automatically.

Subgrantee process, Wave 3, optional. The state will publish the remaining project area units, the EHCPLT, and the minimal BEAD outlay of applications that are selected as provision winners in the previous two waves for two weeks. For the next two weeks, applicants will have an opportunity to (1) refine their existing applications to revise the BEAD outlay downward and/or provider match upward, and/or (2) refine their existing applications to remove any conflict with

project areas of provisional awards and adjust BEAD outlay accordingly, and/or (3) submit new applications. In the next 8 weeks, the state will process all proposals, and then run the deconfliction process. In parallel, the state will reach out to providers and subgrantees to directly negotiate coverage for areas that received no bids.

C. Ensuring that the subgrantee process is fair, open, and competitive

Safeguards to ensure that the subgrantee selection process is fair. The Illinois Office of Broadband will establish safeguards against collusion, bias, conflicts of interest, and arbitrary decisions. The IOB will establish clear policies and guidelines that outline the expectations, responsibilities, and procedures for the subgrantee selection process. Templates will be provided to the applicants whenever possible to streamline the application process. The IOB will use a standardized scoring rubric with guidance on calculating points to facilitate an objective evaluation process. Each applicant is required to submit a conflict-of-interest disclosure as part of the standard application package. Participation in the subgrantee process is contingent upon a review of the conflict-of-interest disclosure. In addition, the IOB will maintain records of all evaluations, communications, and decisions.

Safeguards to ensure that the subgrantee selection process is open. The IOB will give adequate public notice to all potential subgrantees so that a wide variety of potential applicants may participate. Specifically, the IOB will post a public notice with detailed guidance for 30 calendar days prior to the challenge process and 30 calendar days prior to the BEAD subgrantee selection process. Throughout the two processes, the IOB will host periodic virtual information sessions to address providers' questions and to issue clarifying guidance if needed. The IOB will ensure that the information and virtual sessions are accessible to all providers.

Safeguards to ensure that the subgrantee process is competitive. The IOB does not believe that any of its current evaluation criteria are competitively biased; however, the IOB will use the public comment period of the Initial Proposal Volume II to ensure that the proposed evaluation criteria do not favor one type of provider over another.

Req 2.4.2 Text Box: Describe how the prioritization and scoring process will be conducted and is consistent with the BEAD NOFO requirements on pages 42 – 46.

The below steps for prioritization and scoring will be applied in Waves 1 and 2 of the subgrantee process with one exception: Wave 1 will only focus on applications whose project area meets the hard-to-serve project area units threshold. Given that the state will not have an EHCPTH for Wave 1, the state will only reward non- priority broadband projects if no priority broadband alternative exists for the same project area. Illinois plans to follow the BEAD guidance for prioritization as outline below.

- If **only one** application (1) constitutes a Priority Broadband Project, (2) satisfies all other requirements set out in the BEAD NOFO with respect to subgrantees, and (3) is within the Extremely High Cost-Per-Location Threshold in a location or set of locations, the application will be the default winner, unless the state requests—and the Assistant Secretary grants—a waiver allowing the state to select an alternate project.
- If **two or more** applications (1) constitute a Priority Broadband Project, (2) satisfy all other requirements set out in the BEAD NOFO with respect to subgrantees, and (3) are within the Extremely High Cost-Per-Location Threshold in a location or set of locations, the IOB will apply the selection criteria shown in Req 2.4.2.1.
- If **no** applications (1) constitutes a Priority Broadband Project, (2) satisfies all other requirements set out in the BEAD NOFO with respect to subgrantees, (3) is within the Extremely High Cost-Per-Location Threshold in a location or set of locations, and if competing projects that are not Priority Broadband Projects cover the same locations or area, the IOB will apply the same selection criteria shown in Table 4 in Req 2.4.2.1.

The Office of Broadband will provide a submission template to streamline the scoring process. Using the template, applicants will submit all requested information (such as the dollar amount to serve all unserved locations and underserved locations, the amount of matching funds, or the price offered for different speeds).

Req 2.4.2.1 Attachment: As a required attachment, submit the scoring rubric to be used in the subgrantee selection process for deployment projects. Eligible Entities may use the template provided by NTIA, or use their own format for the scoring rubric.

A. Scoring rubric of Connect Illinois Round 4

Table 4. Scoring Table for Connect Illinois Rd 4 Rubric

BEAD Criteria	Weighting	Description
Minimal BEAD program outlay: non-state match	25%	More points will be assigned to the degree of nonstate match over 30%, as a greater nonstate match signifies more “skin in the game” and therefore financial risk assumed by the applicant. See subsection B below for more details.
Minimal BEAD program outlay: financial need with respect to reference cost	25%	Points will be assigned based on how much the application’s required BEAD outlay deviates from the reference cost published by the state. More points will be assigned to applications with lower BEAD outlay compared to the reference cost. See subsection C below for more details.
Affordability	20%	Applicants will be scored based on the price they offer for four speed tiers: 1G/1G, 500/100Mbps, 100/100Mbps, and 100/20Mbps. See subsection D below for more details.
Fair Labor Practices	5%	Points will be assigned if applicants can provide demonstrated record of and plans to be in compliance with federal labor and employment laws.
Sum of primary criteria	75%	
Speed to deployment	3%	Points for enforceable deployment plans faster than 48 months
Speed of network and technical capabilities	6%	Points based on performance levels and scalability networks. See subsection E below for more details.
Open access	6%	Points based on subgrantee’s provision of open access and use of existing network

Local coordination: evidence of community support	4%	Points based on degree of breadth and depth of community support for the project
Local coordination: verified financial commitment from community	4%	Points based on financial investment by community members and organizations
Local coordination: past participation in Accelerate Illinois	2%	Points based on whether the project areas are in communities that participated in Accelerate Illinois Broadband Infrastructure Planning Program
Sum of Secondary and Optional criteria	25%	

B. Minimal BEAD program outlay: non-state match (25%)

Similar to scoring in previous Connect Illinois grant rounds, more points will be assigned to the degree of nonstate match over 30%, as a greater nonstate match signifies more “skin in the game” and therefore financial risk assumed by the applicant.

Table 5. Scoring Table for Nonstate Matching Funds Provided

Percent of eligible project costs covered by nonstate match	Points
60% or more	25
55 – 59%	20
50 – 54%	16
45 – 49%	12
40 – 44%	8
35 – 39%	4
30 – 34%	2
Less than 30%	0

C. Minimal BEAD program outlay: financial need with respect to reference cost (25%)

Points will be assigned based on how much the application's required BEAD outlay deviates from the reference cost published by the state. More points will be assigned to applications with lower BEAD outlay compared to the reference cost.

See Table 6 below for the scoring method used to assess the potential deviation of financial needs from reference cost. Since the IOB has not used a reference cost in prior Connect Illinois grant rounds, the range of deviation for which the state is awarding points—from 0% to 200% of the reference cost—may not accurately reflect the situation in Illinois. Before the start of either wave of the subgrantee process, the IOB may adjust the alignment between percentage deviation and points allocated.

Table 6. Scoring table for financial need with respect to reference cost

Application's BEAD outlay as a percentage of reference cost	Points
0 – 19%	25
20 – 39%	22
40 – 59%	19
60 – 79%	16
80 – 99%	13
100 – 119%	10
120 – 139%	8
140 – 159%	6
160 – 179%	4
180 – 199%	2
200% or more	0

D. Affordability (20%)

Providers will be scored based on the price they offer for four speed tiers: 1G/1G, 500/100Mbps, 100/100Mbps, and 100/20Mbps. The weighting applied to each speed tier, which shows how scores assigned to affordability will be allocated among the four tiers, and corresponding reference price are documented in Table 7 below.

Table 7. Affordability scoring for reference price and weight

#	Speed tier	Weight of speed tier	Monthly reference price
A	1G/1G	25%	\$100
B	500/100 Mbps	25%	\$80
C	100/100 Mbps	25%	\$50
D	100/20 Mbps	25%	\$30

For each of the speed tiers listed in the Table 7, providers will be awarded points based on the difference between their price and the reference price. The score for each speed tier will be calculated as follows:

1. Any application that includes a five-year commitment to offer the listed speed or above **for the monthly reference price**, with no installation, equipment rental fees, or other charges to the end-user, shall receive a baseline score of 10.
2. Any application that includes a five-year commitment to offer the listed speed or above **for less than the monthly reference price** will receive an **upward adjustment** to the baseline score of 10 as follows:
 - a. $\text{Score} = 10 + 10 * [(\text{reference price} - \text{commitment price}) / \text{reference price}]$, up to a maximum of 30 total points. In other words, additional points will be awarded based on the percentage of the commitment price below the reference price.
3. Any application that includes a five-year commitment to offer the listed speed or above **for more than the monthly reference price** will receive a **downward adjustment** to the baseline score of 10 as follows:
 - a. $\text{Score} = 10 - 10 * [(\text{commitment price} - \text{reference price}) / \text{reference price}]$, down to a minimum of 0 points. In other words, points will be subtracted based on the

percentage of the commitment price above the reference price. By this calculation, if the commitment price is 200% above the reference price, the application will receive no points for this speed tier.

The points awarded to each application will be the weighted average points of the four speed tiers, with weighting specified in Table 7. The affordable scoring criteria, as laid out above, encourages applicants to offer affordable plans at all speed tiers. If a provider does not offer plans for lower speed tiers, the price for the higher speed tier will be logically considered as the price for the lower speed tiers. If such price is more than 100% more expensive than the reference price of the lower speed tier, the provider will be awarded no points for those speed tier categories.

E. Speed of network and technical capabilities (5%)

Providers will be scored based on the minimal available speed after build, as described below. The state will award 1 point for applicants who choose to include CAIs in their applications and separately submit the BEAD outlay to connect CAIs. If BEAD funds remain after all unserved and underserved locations are accounted for, the state will reimburse providers for the BEAD outlay to connect CAIs.

Table 8. Scoring for speed of network and technical capabilities

Minimal Available Speed After Build	Score
100/20 Mbps	1
100/100 Mbps	3
1G/1G	5
Submitting the BEAD outlay to connect all CAIs in the project area	Additional 1 point

F. Differences between the scoring rubric of Connect Illinois Round 4 and prior rounds of Connect Illinois

The IOB seeks to maintain continuity of the Connect Illinois grant rounds but recognizes the need to adhere to the NTIA BEAD guidelines. As such, the IOB has deliberately used some of the existing scoring criteria from previous grant rounds but has adjusted them to meet BEAD requirements. The table below shows the crosswalk between BEAD requirements and the Connect Illinois Round 3 scoring criteria.

Table 9. Crosswalk between the scoring rubric of Connect Illinois Round 4 (BEAD) and Connect Illinois Round 3

Category	CI Rd 4 Criteria (only criteria based on CI Rd 3 included)	CI Rd 3 Criteria ⁴⁴
Priority	Minimal BEAD program outlay	B1. Degree of Non-State Match B2. Demonstration of Financial Need ⁴⁵
	Affordability	G1. Range of Service Packages G2. Price Points
Secondary	Speed of network & technical capabilities (non-Fiber only)	A1. Broadband Impact E1. Network Capacity and Scalability
Optional	Open access	D3. Leveraging Existing Resources and Operating Assets G4. Open Access, Wholesale Offerings
	Local/Tribal Coordination	C1. Evidence of Community Support C2. Verified Financial Commitment from Community

⁴⁴ [Connect Illinois Round 3 NOFO](#), Page 8

⁴⁵ Criteria name updated to “financial need with respect to reference cost” to reflect the addition of reference cost in scoring

Req 2.4.3 Text Box: Describe how the proposed subgrantee selection process will prioritize Unserved Service Projects in a manner that ensures complete coverage of all unserved locations prior to prioritizing Underserved Service Projects followed by prioritization of eligible CAIs.

The Illinois Office of Broadband is strongly committed to prioritizing Unserved Service Projects over Underserved Service Projects so that all unserved locations will receive coverage before underserved locations are addressed. The state does not anticipate having funds left for connecting CAIs but will include in the scoring criteria, Speed of network & technical capabilities, points based on the number of CAIs the project connects. Providers that choose to include CAIs in their applications are required to separately submit the BEAD outlay to connect CAIs. If BEAD funds remain after all unserved and underserved locations are accounted for, the state will reimburse providers for the BEAD outlay to connect CAIs.

As such, the IOB designed the grant process to ensure that applications focusing on unserved service projects, especially those in persistence poverty areas, are prioritized. Outlined below are strategies the IOB adopted to maximize the number of unserved locations included in applications.

1. **Designating hard-to-serve locations.** As discussed in the response to Req. 2.4.1, before beginning the subgrantee process, the IOB will designate a set of as hard-to-serve project area units based on (1) the proportion of unserved BSLs, (2) past providers' interest, (3) outcomes of previous grant rounds (i.e., Connect Illinois R1 and R2, RDOF), and (4) poverty level of the county. This delineation will allow the IOB to provide special considerations to these areas, which include:
 - a. Potentially setting a higher reference cost for hard-to-serve project area units to incentivize provider participation.
 - b. Evaluating project areas that include a sufficient number of hard-to-serve project area units in "Wave 1" of the subgrantee process.⁴⁶ As described in the response to

⁴⁶ Detailed rules on participation of Wave 1 will be published when the IOB post PAU and hard-to-serve PAU for public review.

Req. 2.4.1, Connect Illinois Rd 4 will consist of two waves of applications and awards. The first wave of the process will focus on connecting hard-to-serve locations that are mostly unserved, hard-to-serve based on historic provider interest, and located in counties with persistent poverty.

2. **Group together unserved locations with less provider interest, as indicated in previous Connect Illinois rounds, with locations that require less subsidy, to form project area units:** Based on the information acquired from past grant rounds (i.e., Connect Illinois Rd 1 & Rd 2 & Rd 3, RDOF), the IOB will have preliminary knowledge of locations that may not be included in any provider applications. To decrease the likelihood that these locations remain stranded in the subgrantee process, the IOB may group them with nearby, more popular locations to form project area units. This step is intended to encourage providers to extend coverage to ensure all unserved locations are covered.

However, if after pursuing all these steps, not all unserved or—if applicable—all underserved locations have been covered by an awarded subgrant, the state will engage in additional outreach to existing providers and/or new subgrantees to close these remaining coverage gaps. The strategies on how the IOB will engage with prospective subgrantees is described in the response to Req. 2.4.7.

Req 2.4.4 Text Box: If proposing to use BEAD funds to prioritize non-deployment projects prior to, or in lieu of the deployment of services to eligible CAIs, provide a strong rationale for doing so. If not applicable to plans, note “Not applicable.”

Not applicable.

Req 2.4.5 Text Box: The proposed subgrantee selection process is expected to demonstrate to subgrantees how to comply with all applicable Environmental and Historic Preservation (EHP) and Build America, Buy America Act (BABA) requirements for their respective project or projects. Describe how the Eligible Entity will communicate EHP and BABA requirements to prospective subgrantees, and how EHP and BABA requirements will be incorporated into the subgrantee selection process.

The Illinois Office of Broadband is committed to ensuring that subgrantees use the BEAD funds to purchase services, goods, products, and materials produced and offered in the United States,

thereby using taxpayer dollars to fuel job creation, boost economic resilience, and empower local businesses.⁴⁷ To ensure compliance with the Build America, Buy America Act (BABAA), the IOB will communicate the requirements stipulated in the BABAA to all applicants in the Connect Illinois Rd 4 NOFO under “Administrative and National Policy Requirements.”^{48,49} The IOB will highlight the following key points as stipulated by the BEAD NOFO:

- a. All iron, steel, and manufactured products (including but not limited to fiber-optic communications facilities) and construction materials used in the project or other eligible activities must be produced in the United States unless a waiver is granted.
 - i. The NTIA has established criteria to prioritize products targeted for onshoring⁵⁰:
 - 1) Strategically important technologies—like those that ensure the security, integrity, and reliability of network data—should be produced in America.
 - 2) If a product’s domestic manufacturing line can be scaled quickly, it should be produced in America.
 - 3) If a product—like the fiber-optic cable so critical to deploying high-speed Internet networks in communities throughout the country—comprises a significant portion of the overall network spend, it should be produced in America.
 - ii. The NTIA has determined that providers may onshore the eligible products, as several companies have already announced plans to open or expand fiber-optic cable and electronics manufacturing operations here in America (e.g., Corning, CommScope, and Prysmia).⁵¹
 - iii. However, the NTIA acknowledges that some circumstances may require a non-availability waiver for certain pieces of broadband equipment. (For example, some chips may not be available in time to meet BEAD Program construction timelines.) To

⁴⁷ [Build America, Buy America Act](#), Internet for All

⁴⁸ Infrastructure Investment and Jobs Act of 2021, Division G, Public Law 117-58, 135 Stat. 429 (November 15, 2021)

⁴⁹ [Build America, Buy America Factsheet and FAQ](#), Office of Management and Budget

⁵⁰ [NTIA BABA requirements](#), Internet for All, Aug. 22, 2023

⁵¹ [NTIA BABA requirements](#), Internet for All, Aug. 22, 2023

- address such circumstances, the NTIA has issued a draft “limited and targeted, general applicability, nonavailability Build America, Buy America” waiver for the Broadband Equity Access and Deployment Program. The waiver lays out a strict approach to enforcing rules that protect and create American jobs.⁵²
- iv. The policies in the waiver ensure that close to 90% of BEAD funding spent on equipment will be spent on equipment manufactured in the United States.
 - v. The waiver aims to⁵³:
 - 1) Incentivize the domestic production of specific manufactured products based on strategic prioritization criteria, including network and data security, which will directly expand American job opportunities.
 - 2) Promote broad participation in the BEAD Program.
 - 3) Ensure that BEAD Program awardees have access to the manufactured products necessary to fulfill their obligations under the program.
 - a) Allow funding recipients to continue to provide economic opportunities through innovation and timely deployment of broadband infrastructure, which is known to expand job opportunities.
 - b) Support the timely development of critical domestic infrastructure.
 - b. Details on the waiver policy will be communicated to prospective subgrantees once the waiver’s public comment period closes and the policy is finalized by the Department of Commerce.⁵⁴
 - c. In determining whether a product is produced in America, subgrantees must use the definitions included in Section 70912 of the Build America, Buy America Act, which states that a manufactured product is considered to be produced in the United States if: (i) the

⁵² [Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of Broadband Equity, Access, and Deployment Program](#), Department of Commerce

⁵³ [BEAD Build America, Buy America Waiver Request for Comment](#), NTIA, Aug. 22, 2023

⁵⁴ [Limited General Applicability Nonavailability Waiver of the Buy America Domestic Content Procurement Preference as Applied to Recipients of Broadband Equity, Access, and Deployment Program](#), Department of Commerce

product was manufactured in the United States and (ii) the cost of the components of the manufactured product that are mined, produced, or manufactured in the United States is greater than 55 percent of the total cost of all components of the manufactured product, unless another standard for determining the minimum amount of domestic content of the manufactured product has been established under applicable law or regulation.

- d. In addition to the provisions above, subgrantees may not use BEAD funding to purchase or support any covered communications equipment or service, as defined in Section 9 of the Secure and Trusted Communications Networks Act of 2019 (47 U.S.C. § 1608).
- e. The Infrastructure Act expressly prohibits subgrantees from using BEAD funding to purchase or support fiber-optic cable and optical transmission equipment manufactured in the People’s Republic of China unless a waiver of this requirement is received from the Assistant Secretary.

The IOB will incorporate the requirements of the Build America, Buy America Act into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant-monitoring program requirements. Webinars and programming that cover information about the BABAA requirements will also be conducted.

Any application that does not show intent to abide by BABAA or explicitly violates the requirements will not be considered for BEAD funding.

The Illinois Office of Broadband will also ensure that subgrantee projects’ potential environmental impact is analyzed as required by, and to ensure compliance with, the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) for Eligible Entity applications and awardee projects as well as other eligible activities seeking funding under the BEAD Program. The IOB will communicate requirements stipulated in the National Environmental Policy Act (NEPA) and the National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) to all applicants in the Connect Illinois Rd 4 NOFO, under “Administrative and National Policy Requirements.” The IOB will highlight the following key points as stipulated by the BEAD NOFO:

- a. Projects or other eligible activities containing construction and/or ground-disturbing activities must submit all required environmental documentation to NTIA with their final applications, which also must describe how they will comply with applicable environmental and national historical preservation requirements.
- b. It is Illinois's and subgrantees' responsibility to obtain all necessary federal, state, and local governmental permits and approvals necessary for the proposed work to be conducted.
- c. Projects and other eligible activities are expected to be designed to minimize potential adverse impacts on the environment.
- d. Additional information may be required after an application is accepted for funding. (For example, additional environmental compliance information may be needed for the agency to assess any impacts that a project or other eligible activity may have on the environment.)

The IOB will cooperate with NTIA in identifying feasible measures to reduce or avoid any identified adverse environmental impacts of subgrantees' proposed projects or other eligible activities.

The IOB will incorporate the requirements of the National Environmental Policy Act (NEPA) (42 U.S.C. § 4321 et seq.) and National Historic Preservation Act (NHPA) (54 U.S.C. § 300101 et seq.) into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant-monitoring program requirements. Webinars and programming that provide information about regulations will also be conducted.

Any application that explicitly violates the EHP regulations will not be considered for BEAD funding.

Last-Mile Broadband Deployment Project Areas

Req 2.4.6 Text Box: Describe how the Eligible Entity will define project areas from which they will solicit proposals from prospective subgrantees. If prospective subgrantees will be given the option to define alternative proposed project areas, describe the mechanism for de-conflicting overlapping proposals to allow for like-to-like comparisons of competing proposals.

As outlined in the grant timeline in the response to Req. 2.4.1, the state will publish a set of project area units for the subgrantee process. Once the state publishes the project area units, providers can submit applications for their desired project area(s), consisting of one or more project area units. (Note that at this stage, project area units cannot be further sub-divided to form a project area.) To further streamline the de-conflicting process, for each application, providers are required to submit a set of “must-include” project area units.

De-conflicting. The IOB intends to run a similar de-conflicting process for all waves of the subgrantee process. Following the submission of applications in each wave, the IOB will process the applications and run the following de-conflicting process:

- a. The IOB will rank all applications by score, considering non-Priority Broadband Projects if (1) there is no Priority Broadband Project in the same area, or (2) there is no Priority Broadband Project in below the EHCPLT in the same area.
- b. The application with the highest score among applications in the pool will be chosen as the provisional winner.
- c. For applications that conflict with the project area of the provisional winner, if the conflicting area overlaps with the must-include area, the applicants will have the option to withdraw their applications. Otherwise,
 - i. If overall cumulative conflict is less than 10% of the BSLs in the original application, the state will directly de-scope the application, using the reference cost as a guidance (i.e., the state will take out the conflicted locations, and scale the BEAD outlay by the ratio of reference cost of the conflicting locations to reference cost of the whole project area)

- ii. If the overall cumulative conflict is more than 10%, the state will inform applicants to revise their applications to include only non-conflicting project areas. Remaining de-conflicted applications will be re-scored based on the non-conflicting area only.
- d. The state will iterate steps (b) to (c) until all applications are processed.

Depending on the complexity of the de-scoping process, the state may require providers to submit the BEAD outlay of their “must-include” area, and the BEAD outlay of adding on each additional non-must-serve project area unit separately at step c)-ii of the de-conflicting process.

Req 2.4.7 Text Box: If no proposals to serve a location or group of locations that are unserved, underserved, or a combination of both are received, describe how the Eligible Entity will engage with prospective subgrantees in subsequent funding rounds to find providers willing to expand their existing or proposed service areas or other actions that the Eligible Entity will take to ensure universal coverage.

The IOB has designed the grant process to encourage providers to submit applications for all unserved and underserved locations. Responses to Req. 2.4.1 and 2.4.3 outline the strategies that the IOB has in place to ensure universal coverage for the state.

However, if the state still does not receive applications to serve all eligible locations, the IOB will:

1. **Directly negotiate with providers.** The IOB will reach out to providers in close proximity to the locations and/or subgrantees that the state has determined to be best positioned to provide coverage to these locations. As a tool for conducting these negotiations, the IOB will refer to the CQA per-location NPV and Total Investment data when assessing the reasonableness of proposed terms for expanding coverage.
2. **Subdivide project area units.** The state may divide project area units into smaller subdivisions which may be applied for separately.
3. **Offer more inducements to serve eligible locations.** If the state has any unawarded BEAD funds, the IOB may consider raising the funding levels above the minimum 25% match requirement, assuming NTIA will grant a waiver if the area is not a High-Cost Area. The IOB may also use state funds to provide additional subsidies to providers.

Locations that do not receive applications despite the modified rules and inducements will be posted online to maintain transparency and to ensure that all interested parties are aware.

Req 2.4.8 Text Box: Describe how the Eligible Entity intends to submit proof of Tribal Governments' consent to deployment if planned projects include any locations on Tribal Lands.

Not Applicable.

Extremely High Cost-Per-Location Threshold

Req 2.4.9 Text Box: Identify or outline a detailed process for identifying an Extremely High Cost-Per-Location Threshold to be utilized during the subgrantee selection process. The explanation must include a description of any cost models used and the parameters of those cost models, including whether they consider only capital expenditures or include operational costs for the lifespan of the network.

The Illinois Office of Broadband plans to use the following process to identify an extremely high cost-per-location threshold (EHCPLT).

The IOB will:

1. Run Wave 1 of the subgrantee process, through which the state will receive applications for project areas and award provisional winners for applications that include hard-to-serve areas.
2. Start the second wave (Wave 2) of the subgrantee process to receive applications for all remaining locations. Once the submission period closes, and the state receives applications for all eligible locations, the IOB will begin to determine the EHCPLT.
3. The state will then determine the EHCPLT according to the following process:
 - i. Estimate the total BEAD outlay by summing:
 - a. Applications for priority broadband projects;
 - b. Non-priority broadband BEAD outlay when only non-priority broadband applications have been submitted;
 - c. Estimated BEAD outlay when there are no applications for a location.

- ii. To determine the total BEAD outlay for the locations that received priority broadband applications, the IOB will run the de-conflicting process (described in the response to Req. 2.4.6) and the make preliminary provisional awards (described in the response to Req. 2.4.2), making reasonable assumptions as to how the BEAD outlay per location would increase due to reduced economies of scale.
 - iii. To determine the total BEAD outlay for the locations that only received non-priority broadband applications, the IOB will run the de-conflicting and award processes internally on non-priority broadband applications, making reasonable assumptions as to how the BEAD outlay per location would increase due to reduced economies of scale.
 - iv. The IOB will estimate the total BEAD outlay for the locations that have not received applications based on several data sources, such as the reference costs for priority and non-priority broadband projects and past provider responses. The estimated BEAD outlay will range from the estimated BEAD outlay for non-priority broadband to the estimated BEAD outlay for priority broadband.
4. Sum the BEAD outlay from the above steps to estimate the total BEAD outlay
- i. If the total BEAD outlay is less than the current available BEAD funding (BEAD funding minus what is awarded to provisional winners in Wave 1), the IOB will not need to set the EHCPLT
 - ii. If the BEAD outlay exceeds the available BEAD funding, the state must stipulate the EHCPLT to optimize the funding (by allowing non-priority broadband projects instead of priority broadband projects in some cases, for example) to fall within the stipulated boundaries. The process for defining this threshold is described below:
 - a. For all projects where a priority and non-priority broadband application exists, the IOB calculates the delta between the non-priority broadband project BEAD outlay and the priority broadband project BEAD outlay and ranks the projects by the size of the delta.
 - b. Starting with projects with the largest delta, the state replaces the priority broadband project BEAD outlay with the non-priority broadband project BEAD

outlay and calculates the resulting total BEAD outlay to connect all eligible locations. This process is repeated for the other projects until the total BEAD outlay to connect all eligible locations falls within the boundaries of the available BEAD funding.

5. Using the steps above, the state will have determined an extremely high cost-per-location threshold. The state will select a priority broadband project if below the threshold, and the state may select a non-priority broadband project if above the threshold to stay within the funding boundaries.

Req 2.4.10 Text Box: Outline a plan for how the Extremely High Cost-Per-Location Threshold will be utilized in the subgrantee selection process to maximize the use of the best available technology while ensuring that the program can meet the prioritization and scoring requirements set forth in Section IV.B.6.b of the BEAD NOFO. The response must describe:

- a. The process for declining a subgrantee proposal that exceeds the threshold where an alternative technology is less expensive.
- b. The plan for engaging subgrantees to revise their proposals and ensure locations do not require a subsidy.
- c. The process for selecting a proposal that involves a less costly technology and may not meet the definition of Reliable Broadband.

A. The process for declining a subgrantee proposal that exceeds the cost of an alternative technology

As described in the response to Req. 2.4.9 above, if the BEAD outlay to serve a location falls above the EHCPLT, the IOB may consider a non-priority broadband project for that location. However, if non-priority applications are not available, or if the IOB views a priority application as more favorable, the IOB reserves the right to award the priority broadband project and may use the available state funding to achieve this purpose.

B. The plan for engaging subgrantees whose applications exceed the EHCPLT to revise their proposals

If a successful priority broadband application is at risk of being rejected in favor of a less appealing, non-priority broadband application because the BEAD outlay exceeds the EHCPLT,

and if the state is conducting “Wave 3” of the subgrantee process, the IOB will give providers the opportunity to revise their funding requests to fall below the EHCPLT in “Wave 3”. If successful, the state will have reduced the subsidy required for the location while selecting the preferred technology per NTIA guidance.

C. The process for selecting a proposal that involves a less costly technology that may not meet the definition of Reliable Broadband

The IOB may select a non-reliable solution if it is the best available solution given the funding available (that is, if there are no priority broadband /non-priority broadband applications below the EHCPLT). The state will evaluate non-reliable solutions on a case-by-case basis after the completion of both waves of application and negotiations with providers. As described in Req. 2.4.1, 2.4.2, 2.4.9, the review and selection process of applications will strictly follow the prioritization framework specified by the BEAD NOFO, with priority broadband project receiving highest priority, non-priority reliable project next, and unreliable broadband project receiving lowest priority.

Deployment Subgrantee Qualifications

Req 2.4.11 Text Box: Describe how the Eligible Entity will ensure prospective subgrantees deploying network facilities meet the minimum qualifications for financial capability as outlined on pages 72-73 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are qualified to meet the obligations associated with a Project, that prospective subgrantees will have available funds for all project costs that exceed the amount of the grant, and that prospective subgrantees will comply with all Program requirements, including service milestones. To the extent the Eligible Entity disburses funding to subgrantees only upon completion of the associated tasks, the Eligible Entity will require each prospective subgrantee to certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the Project until such time as the Eligible Entity authorizes additional disbursements.
- b. Detail how the Eligible Entity plans to establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF).

- c. Detail how the Eligible Entity will require prospective subgrantees to submit audited financial statements.
- d. Detail how the Eligible Entity will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project.

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for financial capability, as outlined in the BEAD NOFO.

- a. The IOB will require prospective subgrantees to certify that they are financially qualified to meet the obligations associated with a project, that they will have available funds for all project costs that exceed the amount of the grant, and that they will comply with all program requirements, including service milestones. The IOB will disburse funding to subgrantees only upon completion of the associated tasks, and each prospective subgrantee must also certify that it has and will continue to have sufficient financial resources to cover its eligible costs for the project, until such time as the IOB authorizes additional disbursements.
- b. To establish a model letter of credit substantially similar to the model letter of credit established by the FCC in connection with the Rural Digital Opportunity Fund (RDOF), the IOB will require prospective subgrantees to submit a letter from a bank that meets eligibility requirements consistent with those set forth in 47 C.F.R. § 54.804(c)(2).⁵⁵ In the letter, the bank will commit to issuing an irrevocable standby letter of credit, in the required form, to the prospective subgrantee. The letter shall at a minimum provide the dollar amount of the letter of credit and the issuing bank's agreement to follow the terms and conditions of the Eligible Entity's model letter of credit. Prior to entering into any subgrantee agreement, each prospective subgrantee shall obtain an irrevocable standby letter of credit, which shall be acceptable in all respects to the IOB and in a value of no less than 25 percent of the sub-award amount. At this step, the subgrantee must obtain

⁵⁵ Rural Digital Opportunity Fund Order, 35 FCC Rcd at 773-77, Appx. C.

an actual letter of credit in place of the bank's commitment to issue a letter of credit, which is required during the application process. To ensure that smaller providers can meet the requirement above, the IOB, as recommended by the BEAD NOFO, will adopt rules under which, upon verification that the subgrantee has met optional or required service milestones, a subgrantee may obtain a new letter of credit or renew its existing letter of credit so that it is valued at a lesser amount than originally required by the Eligible Entity. In no event, however, shall the letter of credit have a value of less than 25 percent of the sub-award amount. In addition to the letter of credit, a prospective subgrantee is required to provide an opinion letter from legal counsel clearly stating—subject only to customary assumptions, limitations, and qualifications—that in a proceeding under Title 11 of the United States Code, 11 U.S.C. § 101 et seq. (the “Bankruptcy Code”), the bankruptcy court would not treat the letter of credit or proceeds of the letter of credit as property of the winning subgrantee’s bankruptcy estate under Section 541 of the Bankruptcy Code.

- c. The IOB will require subgrantees to submit financial statements from the prior fiscal year that are audited by an independent certified public accountant. If the potential subgrantee has not been audited during the ordinary course of business, in lieu of submitting audited financial statements it must submit unaudited financial statements from the prior fiscal year, with a certification that it will provide financial statements from the prior fiscal year that are audited by an independent certified public accountant as soon as it is made available to the subgrantee.
- d. The IOB will not approve any grant for deploying or upgrading network facilities unless it determines that the documents submitted to it demonstrate the prospective subgrantee’s financial capability with respect to the proposed project.
- e. The IOB will require prospective subgrantees to submit business plans and related analyses that substantiate the sustainability of the proposed project. These can be provided as pro forma statements or analyses that include current cash flow and balance sheet projections, as well as at least three years of operating costs and cash flow projections after the targeted completion of the project.

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant-monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability, as outlined on pages 72-73 of the BEAD NOFO, will not be considered for BEAD funding.

Req 2.4.11.1 Optional Attachment: As an optional attachment, submit application materials related to the BEAD subgrantee selection process, such as drafts of the Requests for Proposals for deployment projects, and narrative to crosswalk against requirements in the Deployment Subgrantee Qualifications section.

Req 2.4.12 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for managerial capability as outlined on pages 73 – 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to submit resumes for key management personnel.
- b. Detail how it will require prospective subgrantees to provide a narrative describing their readiness to manage their proposed project and ongoing services provided.

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for managerial capability, as outlined in the BEAD NOFO.

The Illinois Office of Broadband will require prospective subgrantees to submit resumes for all key management personnel and any necessary organizational chart(s) detailing all parents, subsidiaries, and affiliates.

Each prospective subgrantee must also provide a narrative describing the prospective subgrantee's readiness to manage a broadband services network. This narrative should describe the experience and qualifications of key management for undertaking this project, its experience

undertaking projects of similar size and scope, recent and upcoming organizational changes including mergers and acquisitions, and relevant organizational policies.

The IOB will not approve any grant for deploying or upgrading network facilities unless the submitted documents demonstrate the prospective subgrantee's managerial capability for the proposed project.

The IOB will require prospective subgrantees to provide timely updates if any changes are made to the above required documents (such as changes to the organizational structure or key personnel).

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant-monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability, as outlined on pages 73-74 of the BEAD NOFO, will not be considered for BEAD funding.

Req 2.4.13 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for technical capability as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they are technically qualified to complete and operate the Project and that they are capable of carrying out the funded activities in a competent manner, including that they will use an appropriately skilled and credentialed workforce.
- b. Detail how the Eligible Entity will require prospective subgrantees to submit a network design, diagram, project costs, build-out timeline and milestones for project implementation, and a capital investment schedule evidencing complete build-out and the initiation of service within four years of the date on which the entity receives the subgrant, all certified by a professional engineer, stating that the proposed network can deliver broadband service that meets the requisite performance requirements to all locations served by the Project.

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for technical capability, as outlined in the BEAD NOFO.

The Illinois Office of Broadband will require prospective subgrantees to submit certification that they are technically qualified to complete and operate the project and are capable of carrying out the funded activities competently, to include using an appropriately skilled and credentialed workforce (see Section IV.C.1.e of BEAD NOFO).

The IOB will require prospective subgrantees to submit a network design, diagram, project costs, build-out timeline, and milestones for project implementation. They must also submit a capital investment schedule showing a complete build-out and the initiation of service within four years of the date on which they received the subgrant—all certified by a professional engineer—stating that the proposed network can deliver broadband service that meets the performance requirements of all locations served by the project.

The state will not approve any grant for deploying or upgrading network facilities unless the materials submitted demonstrate the prospective subgrantee’s technical capability for the proposed project.

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant-monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability as outlined on page 74 of the BEAD NOFO will not be considered for BEAD funding.

Req 2.4.14 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for compliance with applicable laws as outlined on page 74 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to demonstrate that they are capable of carrying out funded activities in a competent manner in compliance with all applicable federal, state, territorial, and local laws.
- b. Detail how the Eligible Entity will require prospective subgrantees to permit workers to create worker-led health and safety committees that management will meet with upon reasonable request.

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for compliance with applicable laws, as outlined in the BEAD NOFO.

The IOB will require prospective subgrantees to demonstrate that they are capable of carrying out funded activities competently and in compliance with all applicable federal, state, territorial, and local laws.

To ensure that a subgrantee complies with occupational safety and health requirements, subgrantees must permit workers to create worker-led health and safety committees with whom management will meet upon reasonable request. Resources such as the Illinois Department of Labor’s On-Site Safety and Health Consultation Program are available for prospective subgrantees to use.⁵⁶

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant-monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability as outlined on page 74 of the BEAD NOFO will not be considered for BEAD funding.

Req 2.4.15 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for operational capability as outlined on pages 74 – 75 of the BEAD NOFO. If the Eligible Entity opts to provide application

⁵⁶[On-Site Safety & Health Consultation Program](#), Illinois Department of Labor

materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to certify that they possess the operational capability to qualify to complete and operate the Project.
- b. Detail how the Eligible Entity will require prospective subgrantees to submit a certification that they have provided a voice, broadband, and/or electric transmission or distribution service for at least two (2) consecutive years prior to the date of their application submission or that they are a wholly owned subsidiary of such an entity and attest to and specify the number of years the prospective subgrantee or its parent company has been operating.
- c. Detail how the Eligible Entity will require prospective subgrantees that have provided a voice and/or broadband service, to certify that it has timely filed Commission Form 477s and the Broadband DATA Act submission, if applicable, as required during this time period, and otherwise has complied with the Commission's rules and regulations.
- d. Detail how the Eligible Entity will require prospective subgrantees that have operated only an electric transmission or distribution service, to submit qualified operating or financial reports, that it has filed with the relevant financial institution for the relevant time period along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution.
- e. In reference to new entrants to the broadband market, detail how the Eligible Entity will require prospective subgrantees to provide evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities.

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for operational capability as outlined in the BEAD NOFO.

The IOB will require prospective subgrantees to certify that they possess the operational capability to complete and operate the project by submitting the documents below:

- a. Prospective subgrantees that have provided a voice, broadband, and/or electric transmission or distribution service for at least two (2) consecutive years prior to the date of their application, or that are wholly owned subsidiaries of such an entity, must submit a certification that attests to these facts and specifies the number of years the prospective subgrantee or its parent company has been operating.

- b. If the prospective subgrantee has provided a voice and/or broadband service, it must certify that it has filed Commission Form 477s and the Broadband DATA Act submission on time, if applicable, as required during this period, and otherwise has complied with the commission's rules and regulations. Alternatively, a prospective subgrantee should explain any pending or completed enforcement action, civil litigation, or other matter in which it failed to comply or was alleged to have failed to comply with the commission's rules or regulations.
- c. Prospective subgrantees that have operated only an electric transmission or distribution service must submit qualified operating or financial reports that they have filed with the relevant financial institution for the relevant time period, along with a certification that the submission is a true and accurate copy of the reports that were provided to the relevant financial institution. (Acceptable submissions for this purpose will be the Rural Utilities Service [RUS] Form 7, Financial and Operating Report Electric Distribution; the RUS Form 12, Financial and Operating Report Electric Power Supply; the National Rural Utilities Cooperative Finance Corporation [CFC] Form 7, Financial and Statistical Report; the CFC Form 12, Operating Report; the CoBank Form 7; or the functional replacement of one of these reports. See Rural Digital Opportunity Fund Order, 35 FCC Rcd at 719, n. 202.)
- d. Prospective subgrantees that are new entrants to the broadband market must provide evidence sufficient to demonstrate that the newly formed entity has obtained, through internal or external resources, sufficient operational capabilities. Such evidence may include resumés from key personnel; project descriptions and narratives from contractors, subcontractors, or other partners with relevant operational experience; or other comparable evidence.

The IOB will not approve any grant for deploying or upgrading network facilities unless the submitted documents demonstrate the prospective subgrantee's operational capability for the proposed project.

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms and conditions, and grant monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability as outlined on pages 74-75 of the BEAD NOFO will not be considered for BEAD funding.

Req 2.4.16 Text Box: Describe how the Eligible Entity will ensure that any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on ownership as outlined on page 75 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how the Eligible Entity will require prospective subgrantees to provide ownership information consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for providing information on ownership, as outlined in the BEAD NOFO.

The Illinois Office of Broadband will require prospective subgrantees to provide ownership information consistent with the requirements set forth in 47 C.F.R. § 1.2112(a)(1)-(7).⁵⁷

The prospective subgrantees are required to fully disclose the following:

1. List the real party or parties with interest in the applicant or application, including a complete disclosure of the identity and relationship of those persons or entities that directly or indirectly own and/or control the applicant.

⁵⁷ [§ 1.2112 Ownership disclosure requirements for applications](#), Code of Federal Regulations

2. List the name, address, and citizenship of any party holding 10 percent or more of stock in the applicant, whether voting or nonvoting, common or preferred, including the specific amount of the interest or percentage held.
3. List, in the case of a limited partnership, the name, address, and citizenship of each limited partner whose interest in the applicant is 10 percent or greater (as calculated according to the percentage of equity paid in or the percentage of distribution of profits and losses).
4. List, in the case of a general partnership, the name, address, and citizenship of each partner and their share or interest participation in the partnership.
5. List, in the case of a limited liability company, the name, address, and citizenship of each of its members whose interest in the applicant is 10 percent or greater.
6. List all parties holding indirect ownership interests in the applicant as determined by successive multiplication of the ownership percentages for each link in the vertical ownership chain that equals 10 percent or more of the applicant. If the ownership percentage of an interest in any link in the chain exceeds 50 percent or represents actual control, it shall be treated and reported as if it were a 100 percent interest.
7. List any FCC-regulated entity or applicant for an FCC license in which the applicant or any of the parties identified in paragraphs (a)(1) through (a)(5) of this section owns 10 percent or more of stock, whether voting or nonvoting, common or preferred. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant. (For example, if Company A owns 10 percent of Company B, the applicant, and 10 percent of Company C, then Companies A and C must be listed on Company B's application, wherein C is an FCC licensee and/or license applicant.)

In addition to the information required above, each prospective subgrantee claiming eligibility for small business provisions or a bidding credit for rural service providers shall disclose the following:

1. On its application to participate in competitive bidding—that is, the short-form application (see 47 CFR 1.2105):
 - i. List the names, addresses, and citizenship of all officers, directors, affiliates, and other controlling interests of the applicant as described in § 1.2110, and, if a consortium of small businesses or very small businesses, the members of the conglomerate organization.
 - ii. List any FCC-regulated entity or applicant for an FCC license in which any controlling interest of the applicant owns a 10 percent or greater interest or a total of 10 percent or more of any class of stock, warrants, options or debt securities. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant.
 - iii. List all parties with which the applicant has entered into agreements or arrangements for the use of any of the spectrum capacity of any of the applicant's spectrum.
 - iv. List separately and in aggregate the gross revenues, computed in accordance with § 1.2110, for each of the following: the applicant, its affiliates, its controlling interests, and the affiliates of its controlling interests. If a consortium of small businesses, list the members of the consortium.
 - v. If claiming eligibility for a bidding credit for rural service providers, provide all information to demonstrate that the applicant meets the criteria for such credit as set forth in § 1.2110(f)(4).
 - vi. If applying as a consortium of designated entities, provide the information in paragraphs (b)(1)(i) through (v) of this section separately for each member of the consortium.
2. As an exhibit to an application for a license, authorization, assignment, or transfer of control:
 - i. List the names, addresses, and citizenship of all officers, directors, and other controlling interests of the applicant, as described in § 1.2110.
 - ii. List any FCC-regulated entity or applicant for an FCC license in which any controlling interest of the applicant owns a 10 percent or greater interest or a total of 10 percent

or more of any class of stock, warrants, options or debt securities. This list must include a description of each such entity's principal business and a description of each such entity's relationship to the applicant.

- iii. List and summarize all agreements or instruments (with appropriate references to specific provisions in the text of such agreements and instruments) that support the applicant's eligibility as a small business under the applicable designated entity provisions, including the establishment of de facto or de jure control. Such agreements and instruments include articles of incorporation and by-laws, partnership agreements, shareholder agreements, voting or other trust agreements, management agreements, franchise agreements, spectrum leasing arrangements, spectrum resale (including wholesale) arrangements, and any other relevant agreements (including letters of intent), oral or written.
- iv. List and summarize any investor protection agreements, including rights of first refusal, supermajority clauses, options, veto rights, and rights to hire and fire employees and to appoint members to boards of directors or management committees.
- v. List separately and in aggregate the gross revenues, computed in accordance with § 1.2110, for each of the following: the applicant, its affiliates, its controlling interests, and affiliates of its controlling interests. If a consortium of small businesses, list the members of the consortium;
- vi. List and summarize, if seeking exemption for rural telephone cooperatives pursuant to § 1.2110, all documentation to establish eligibility pursuant to the factors listed under § 1.2110(b)(4)(iii)(A).
- vii. List and summarize any agreements in which the applicant has entered into arrangements for the use of any of the spectrum capacity of the license that is the subject of the application.
- viii. If claiming eligibility for a bidding credit for rural service providers, provide all information to demonstrate that the applicant meets the criteria for such credit, as set forth in § 1.2110(f)(4).

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms/conditions, and grant monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability as outlined on pages 75 of the BEAD NOFO will not be considered for BEAD funding.

Req 2.4.17 Text Box: Describe how the Eligible Entity will ensure any prospective subgrantee deploying network facilities meets the minimum qualifications for providing information on other public funding as outlined on pages 75-76 of the BEAD NOFO. If the Eligible Entity opts to provide application materials related to the BEAD subgrantee selection process, the Eligible Entity response may reference those to outline alignment with requirements for this section. The response must:

- a. Detail how it will require prospective subgrantees to disclose for itself and for its affiliates, any application the subgrantee or its affiliates have submitted or plan to submit, and every broadband deployment project that the subgrantee or its affiliates are undertaking or have committed to undertake at the time of the application using public funds.
- b. At a minimum, the Eligible Entity shall require the disclosure, for each broadband deployment project, of: (a) the speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules), (b) the geographic area to be covered, (c) the number of unserved and underserved locations committed to serve (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage), (d) the amount of public funding to be used, (e) the cost of service to the consumer, and (f) the matching commitment, if any, provided by the subgrantee or its affiliates.

The Illinois Office of Broadband is committed to ensuring that prospective subgrantees deploying network facilities meet the minimum qualifications for providing information on other public funding as outlined in the BEAD NOFO.

The IOB will require each prospective subgrantee to disclose, for itself and for its affiliates, any application the subgrantee or its affiliates have submitted or plan to submit, and every broadband deployment project that the subgrantee or its affiliates are undertaking or have

committed to undertake at the time of the application using public funds, including but not limited to funds provided under: the Families First Coronavirus Response Act (Public Law 116-127; 134 Stat. 178); the CARES Act (Public Law 116-136; 134 Stat. 281); the Consolidated Appropriations Act, 2021 (Public Law 116-260; 134 Stat. 1182); the American Rescue Plan of 2021 (Public Law 117-2; 135 Stat. 4); any federal Universal Service Fund high-cost program (such as RDOF and CAF); or any state or local universal service or broadband deployment funding program.⁵⁸

At a minimum, the IOB shall require the disclosure, for each broadband deployment project, of:

- a. The speed and latency of the broadband service to be provided (as measured and/or reported under the applicable rules)
- b. The geographic area to be covered
- c. The number of unserved and underserved locations to be served (or, if the commitment is to serve a percentage of locations within the specified geographic area, the relevant percentage)
- d. The amount of public funding to be used
- e. The cost of service to the consumer
- f. The matching commitment, if any, provided by the subgrantee or its affiliates.

The IOB will incorporate these requirements into the subgrantee selection process by including them in contract negotiation records, grant agreement terms/conditions, and grant monitoring program requirements. Webinars and programming that offer information about subgrantee qualifications will also be conducted.

Any application that does not meet the minimum qualifications for financial capability as outlined on pages 75-76 of the BEAD NOFO will not be considered for BEAD funding.

For all qualifications listed in Sections 2.4.11 to 2.4.17 of this Initial Proposal, the IOB is aware that some prospective subgrantees will have submitted some of the required certifications and

⁵⁸ The term “affiliate” shall be defined consistently with 47 U.S.C. § 153(2): an “affiliate” is a person who (directly or indirectly) owns or controls, is owned or controlled by, or is under common ownership or control with, another person. For purposes of this paragraph, the term “own” means to own an equity interest (or the equivalent thereof) of more than 10 percent.

documents as part of previous Connect Illinois grant rounds. These subgrantees will be moved into an expedited pre-qualification track since the state has already reviewed some of the certifications. The subgrantees that fall into this category will only be required to submit outstanding requirements that have been newly introduced by the BEAD NOFO.

Non-Deployment Subgrantee Selection (Requirement 9)

Req 2.5.1 Text Box: Describe a fair, open, and competitive subgrantee selection process for eligible non-deployment activities. Responses must include the objective means, or process by which objective means will be developed, for selecting subgrantees for eligible non-deployment activities. If the Eligible Entity does not intend to subgrant for non-deployment activities, indicate such.

The state does not intend to use subgrants for non-deployment activities.

Req 2.5.2 Text Box: Describe the Eligible Entity's plan for the following:

- a. How the Eligible Entity will employ preferences in selecting the type of non-deployment initiatives it intends to support using BEAD Program funds.
- b. How the non-deployment initiatives will address the needs of residents within the jurisdiction.
- c. The ways in which engagement with localities and stakeholders will inform the selection of eligible non-deployment activities.
- d. How the Eligible Entity will determine whether other uses of the funds might be more effective in achieving the BEAD Program's equity, access, and deployment goals.

The state does not anticipate engaging in any non-deployment activity.

Req 2.5.3 Text Box: Describe the Eligible Entity's plan to ensure coverage to all unserved and underserved locations prior to allocating funding to non-deployment activities.

The state does not anticipate engaging in any non-deployment activity.

Req 2.5.4 Text Box: Describe how the Eligible Entity will ensure prospective subgrantees meet the general qualifications outlined on pages 71-72 of the BEAD NOFO.

The state does not anticipate engaging in any non-deployment activity.

Eligible Entity Implementation Activities (Requirement 10)

Req 2.6.1 Text Box: Describe any initiatives the Eligible Entity proposes to implement as the recipient without making a subgrant, and why it proposes that approach.

The IOB will require funds for administrative activities to manage the grant, implementation of the challenge process, and implementation of the subgrantee process. The Illinois Office of Broadband will ensure that administrative and programmatic costs are applied appropriately.

Labor Standards and Protection (Requirement 11)

Req 2.7.1 Text Box: Describe the specific information that prospective subgrantees will be required to provide in their applications and how the Eligible Entity will weigh that information in its competitive subgrantee selection processes. Information from prospective subgrantees must demonstrate the following and must include information about contractors and subcontractors:

- a. Prospective subgrantees' record of past compliance with federal labor and employment laws, which:
 - ix. Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years;
 - x. Should include 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 subgrantee, as well as all contractors and subcontractors; and
 - xi. Should include written confirmation that the prospective subgrantee discloses any instances in which it or its contractors or subcontractors 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.
- b. Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:
 - xii. How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
 - 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 Illinois Office of Broadband will require applicants to submit the following information during the application period of the competitive subgrantee selection process:

1. Prospective subgrantees' record of past compliance with federal labor and employment laws, which:
 - i. Must address information on these entities' compliance with federal labor and employment laws on broadband deployment projects in the last three years.

- ii. Should include 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 subgrantee and all contractors and subcontractors.
 - iii. Should include written confirmation that the prospective subgrantee has disclosed any instances in which it or its contractors or subcontractors 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.
2. Prospective subgrantees' plans for ensuring compliance with federal labor and employment laws, which must address the following:
- i. How the prospective subgrantee will ensure compliance in its own labor and employment practices, as well as that of its contractors and subcontractors, including:
 - a. 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.
 - b. 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.

During the review process, the Illinois Office of Broadband will evaluate the submitted materials and determine whether the information submitted meets all requirements. If all requirements are met, applicants will receive full scoring credit (5% of total score) for the Fair Labor Practices criteria.

Req 2.7.2 Text Box: Describe in detail whether the Eligible Entity will make mandatory for all subgrantees (including contractors and subcontractors) any of the following and, if required, how it will incorporate them into binding legal commitments in the subgrants it makes:

- a. Using a directly employed workforce, as opposed to a subcontracted workforce;

- b. Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon and Service Contract Act requirements, where applicable, and collecting the required certified payrolls;
- c. Using 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);
- d. Use of local hire provisions;
- e. Commitments to union neutrality;
- f. Use of labor peace agreements;
- g. Use of 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);
- h. Use of an appropriately credentialed workforce (i.e., satisfying requirements for appropriate and relevant pre-existing occupational training, certification, and licensure); and
- i. Taking steps to prevent the misclassification of workers.

The IOB is highly committed to ensuring that subgrantees, contractors, and subcontractors use strong labor standards and protections. The office will make the following labor standards mandatory for all subgrantees un. These standards will be listed in the Connect Illinois Rd 4 NOFO under “Administrative and National Policy Requirements.”

Paying prevailing wages and benefits to workers, including compliance with Davis-Bacon, where applicable, and collecting the required certified payrolls. The Illinois Office of Broadband will require that all subgrantees that are awarded grants shall comply with all requirements of the Prevailing Wage Act (820 ILCS 130/0.01 et seq.), including, but not limited to, inserting into all contracts for construction a stipulation that not less than the prevailing rate of wages as applicable to the project shall be paid to all laborers, workers, and mechanics performing work under the award, and requiring all bonds of contractors to include a provision that guarantees

the faithful performance of such prevailing wage clause as provided by contract.⁵⁹ Subgrantees will be required to report on their compliance with the Prevailing Wage Act on a monthly basis.

Use of local hire provisions. The IOB will require all subgrantees to comply with the Employment of Illinois Workers on Public Works Act (30 ILCS 570/0.01 et seq.) (the “Act”), which provides that, whenever a period of excessive unemployment occurs in Illinois (as defined by the Act), if the subgrantee is using Grant Funds for (1) constructing or building any public works, or (2) performing the clean-up and on-site disposal of hazardous waste for the State of Illinois or any political subdivision of the state, then the subgrantee shall employ at least 90% Illinois laborers on such project.⁶⁰ “Illinois laborers” refers to any person who has resided in Illinois for at least 30 days and intends to become or remain an Illinois resident. Subgrantees may obtain an exception from this requirement by submitting a request and supporting documents certifying that Illinois laborers are either unavailable or are incapable of performing the type of work involved. The certification must:

- a. Be submitted to the grant manager within the first quarter of the Award Term.
- b. Provide sufficient support that demonstrates that the exception is justified.
- c. Be signed by an authorized signatory of the subgrantee.
- d. Be approved by DCEO in consultation with the Illinois Department of Labor.

In addition, every contractor on a public works project or on an improvement or hazardous waste clean-up and on-site disposal project in this state may engage on such work no more than three (or six in the case of a hazardous waste clean-up and on-site disposal project) of the contractor’s regularly employed, non-resident, executive and technical experts.

For projects with a total cost of over \$10 million, the IOB mandates subgrantees to either adopt the standards listed below or provide a project workforce continuity plan.

Use of project labor agreements (that is, pre-hire collective bargaining agreements between unions and contractors that govern terms and conditions of employment for all workers on a

⁵⁹ [Prevailing Wage Act](#), Illinois General Assembly

⁶⁰ [Employment of Illinois Workers on Public Works Act](#), Illinois General Assembly

construction project). For projects with total project costs of over \$10 million, the IOB stipulates that subgrantees may provide a certification that a project includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with Section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)) and the Illinois Project Labor Agreements Act (30 ILCS 571).^{61,62} Subgrantees will provide a copy of the project labor agreement. A project labor agreement must:

- a. Set forth mutually binding procedures for resolving jurisdictional labor disputes and grievances.
- b. Guarantee against strikes, lockouts, or similar actions.
- c. Ensure a reliable source of labor.
- d. Set goals for woman and minority apprenticeship hours.
- e. Permit the selection of the lowest responsible bidder, regardless of union status.
- f. Bind all contractors and subcontractors by including bid specifications in all relevant bid documents.
- g. Be signed by a bona fide labor organization. Subgrantees will provide contact information for the bona fide labor organization.

In addition to the outlined stipulations, the IOB recognizes the importance of the remaining labor standards listed in the BEAD NOFO but does not plan to incorporate any of the following items into legally binding commitments:

- a. Use of a directly employed workforce instead of a subcontracted workforce;
- b. Commitments to union neutrality;
- c. Use of labor peace agreements;
- d. Use of an appropriately skilled workforce;
- e. Use of an appropriately credentialed workforce; and
- f. Taking steps to prevent the misclassification of workers.

⁶¹ [National Labor Relations Act](#), National Labor Relations Board

⁶² [Project Labor Agreements Act](#), Illinois General Assembly

Workforce Readiness (Requirement 12)

Req 2.8.1 Text Box: Describe how the Eligible Entity and their subgrantees will advance equitable workforce development and job quality objectives to develop a skilled, diverse workforce. At a minimum, this response must clearly provide each of the following, as outlined on page 59 of the BEAD NOFO:

- a. A description of how the Eligible Entity will ensure that subgrantees support the development and use of a highly skilled workforce capable of carrying out work in a manner that is safe and effective;

The State of Illinois has multiple training and apprenticeship programs that prepare workers for jobs in construction, telecommunications, and other fields.

- Illinois has over 270 registered **apprenticeship programs** that provide on-the-job training combined with classroom instruction to develop skilled tradespeople in construction and telecommunications.⁶³ All apprenticeship programs in Illinois are registered and overseen by the US Department of Labor. The state has a dedicated workforce portal through which residents can access information on existing apprenticeship programs available in counties or regions of Illinois. Construction and telecommunications are highlighted as key industries on the workforce portal’s landing page.⁶⁴
- Examples of apprenticeship programs in the construction and telecommunications industries include Southern Illinois JATC Telecommunications Apprenticeship Program, City of Springfield's Electrical Apprentice program, Southern Illinois College Construction Trades Pre-Apprenticeship Program, and Illinois Laborers and Contractors Joint Apprenticeship and Training Program.^{65,66,67,68}
- **Illinois Innovation Network (IIN)** partnered with the Department of Commerce and Economic Opportunity to offer **training and advanced degree programs** through

⁶³ Obtained from doing a search of “construction” apprenticeship partners in Illinois on the [Apprenticeship Partnership Finder Tool](#), hosted on the official US government Apprenticeship website

⁶⁴ [Apprenticeship Illinois](#), Illinois Worknet

⁶⁵ [Southern JATC Telecommunications Apprenticeship Program](#)

⁶⁶ [City of Springfield, Illinois Misty Buscher Electric Apprenticeship](#)

⁶⁷ [Southwestern Illinois College \(SWIC\) Construction Trades Pre-Apprenticeship Program](#), SWIC Official Website

⁶⁸ [Illinois Laborers and Contractors Joint Apprenticeship and Training Program Official Website](#)

institutions of advanced education and partner organizations such as community colleges. This training and education prepares candidates for high-demand and emerging fields, including broadband and technology. This partnership is part of Illinois’s 2020 – 2024 Workforce Innovation and Opportunity State Act Plan.⁶⁹

The state is further investing through the Department of Commerce and Economic Opportunity (DCEO) to support the development of a highly skilled workforce in Illinois. The DCEO manages the following programs:

- The **State Apprenticeship Expansion Program** funds 16 apprenticeship intermediary programs located in 10 regions in Illinois. The apprenticeship intermediary programs include programs that prepare candidates for building and construction work. One example of the intermediary program related to construction is the ABC—the Illinois Associated Builders and Contractors Association—which serves the Northern Region of the state.⁷⁰
- **Illinois Works Construction Pre-Apprenticeship Program** is a grant program established by the DCEO to fund programs that train under-represented populations in the construction and building trades.⁷¹ In 2022, \$12 million was awarded to 29 programs—including various urban leagues, foundations, and community assistance programs—in six DCEO regions to provide pre-apprenticeship skills training free of charge. An additional \$10 million in funding is being deployed in 2023 to expand the program’s network of providers.⁷²

The state will ensure that subgrantees support the development and use of a highly skilled workforce that can work safely and effectively by:

- **Requiring compliance with the Illinois Works Apprenticeship Initiative.** Under the Illinois Works Jobs Program Act, The Illinois Works Apprenticeship Initiative is a required

⁶⁹ [2022 Illinois WIOA Unified Plan Modification Approved by DOL](#)

⁷⁰ [Illinois Apprenticeship Initiatives](#), Illinois Worknet

⁷¹ [Illinois Works Pre-Apprenticeship Program](#), DCEO Website

⁷² [Illinois Works Pre-Apprenticeship NOFO 2023](#), Illinois Worknet

program that aims to foster equity in construction jobs. The program applies to public works projects with \$500,000 or more in costs, for which apprentices are to perform 10% of the actual total labor hours worked or 10% of estimated labor hours in each prevailing wage category, whichever is less. Grantees are required to periodically file a report showing compliance with this requirement.⁷³

- Compliance with the Illinois Works Apprenticeship Initiative has been required in previous rounds of Connect Illinois, and the IOB has hosted information sessions for providers and other stakeholders specifically on this requirement.^{74,75}
- **Providing incentives for hiring Illinois residents who have participated in pre-apprenticeship programs.** As part of the Illinois Works Jobs Program Act, Illinois Works Bid Credit Program ensures that contractors and subcontractors hire and retain graduates of the Illinois Works Pre-apprenticeship Program. The bid credit program allows contractors and subcontractors to earn bid credits by employing and retaining apprentices who have completed the Illinois Works Pre-apprenticeship Program. Bid credits can be used toward future bids for public works projects contracted by an agency of the state.⁷⁶
- **Ensuring that applicants are aware of the right resources on workforce safety and effectiveness during all rounds of Connect Illinois and during stakeholder engagement events.** Some of the available resources include:
 - **The Illinois Occupational Safety and Health Administration (IL OSHA)** is a division of the Illinois Department of Labor established to enforce the Occupational Safety and Health Act across state and local government employers. The federal OSHA enforces the Occupational Safety and Health Act across private employers and federal agencies. Both the federal and state OSHA have a mission to ensure safe and healthy working conditions and meet this objective by enforcing safety standards and

⁷³ [Section 20 – 20 of the \(30 ILCS 559/\) Illinois Works Jobs Program Act](#), Illinois General Assembly Website

⁷⁴ [Connect Illinois Round 3 NOFO Supplement](#), DCEO Grant Opportunities

⁷⁵ [Prevailing Wage & the Illinois Works Apprenticeship Program event as part of the Illinois Broadband Lab Series](#), U of I Illinois Extension website

⁷⁶ [2023 Illinois Works Pre-Apprenticeship Grantee Manual](#), IL DCEO

providing compliance training, outreach, and education to employers and employees. The federal and state OSHA provide free consultation services to employers to help them comply with safety and health standards. Employees may also file complaints against employers who are not abiding by the Occupational Safety and Health Act.^{77,78,79,80}

- b. A description of how the Eligible Entity will develop and promote sector-based partnerships among employers, education and training providers, the public workforce system, unions and worker organizations, and community-based organizations that provide relevant training and wrap-around services to support workers to access and complete training (such as child care, transportation, mentorship, etc.), to attract, train, retain, or transition to meet local workforce needs and increase high-quality job opportunities;

The state recognizes that building stronger partnerships with industries to develop a talent pipeline will drive economic and community prosperity.⁸¹ Since 2020, the state has been executing the plans laid out in the 2020 – 2024 Workforce Development Strategic Plan to develop and promote sector-based partnerships by:⁸²

1. **Promoting employer-led sector strategies via technical assistance.** DCEO staff continues to conduct informational sessions on the Illinois Next Generation Sector Strategies Framework and the Talent Pipeline Management System with stakeholders such as business groups, industry groups, and rural economic development professionals, as well as at state and regional events held by the workforce system.
2. **Creating strategies for talent pipeline management (TPM).** The DCEO created six strategies for TPM, the first of which is the formation of regional, sector-based employer collaboratives using its apprenticeship expansion grants. Initial grantees sent a team to a U.S. Chamber Academy for training in implementing the strategies. Regional apprenticeship navigators, economic development teams, and local nonprofits (such as

⁷⁷ [Occupational Safety and Health Act](#), Illinois Compiled Statutes on the Illinois General Assembly Website

⁷⁸ [Illinois OSHA](#), Illinois Department of Labor Official Website

⁷⁹ [Occupational Safety and Health Administration](#), US Department of Labor Official Website

⁸⁰ [Contact Information for OSHA offices in Illinois](#), OSHA Official Government Website

⁸¹ [Sector strategies](#) of Workforce Innovation and Opportunity Act of Illinois

⁸² [WIOA 2020 – 2024 Workforce Development Strategic Plan](#), Illinois Worknet

economic developers and chambers) are jointly creating sector partnerships led by business champions to address current and future demands for talent supply. Navigators are responsible for promoting and creating a network that includes, but is not limited to, industry associations, chambers of commerce, community-based organizations, local workforce areas, community colleges, technical schools, and/or school districts.

3. The DCEO will also promote sector partnerships related to TPM by hosting two TPM academies. Ten community colleges will participate in the first academy, which will focus on training providers who are currently serving as apprenticeship intermediaries. The second academy will involve stakeholders who are playing a significant role in regional sector partnerships. Case studies from the second academy will be used as best practices for continuing sector partnerships.
4. **Expanding the policy framework to support employer-led partnerships.** The Illinois Workforce Innovation Board (IWIB)'s Business Engagement Committee (BEC) is tasked with expanding the statewide policy framework outlining how state and regional resources can be used to launch, expand, and support employer-led partnerships.⁸³
5. **Choosing business champions to lead sector partnership.** The Illinois Workforce Innovation Board (IWIB) is choosing business champions to lead sector partnerships. The business champion will lead a group of Regional Apprenticeship Navigators, Economic Development Teams, and local nonprofits to address current and future demand for talent supply.
6. **Promoting sector-based business services and employer initiatives.** One of the BEC's priorities is to engage the Illinois business community in developing regional, industry-led sector partnerships. It will do so through the Industry Working Group, a work group of the BEC that seeks to create a network of sector-based champions to assist in business outreach in targeted industries.

⁸³ [Attachment G: Illinois Sector Partnership Framework](#), Illinois Worknet

Additionally, to promote sector-based partnerships specifically for broadband-related industries, the state is considering:

- Establishing a telecommunications sector partnership using the Talent Pipeline Management Framework.
- Encouraging business champions from the broadband industry to become more involved as IWIB members and in leading sector partnerships.

c. A description of how the Eligible Entity will plan to create equitable on-ramps into broadband-related jobs, maintain job quality for new and incumbent workers engaged in the sector; and continually engage with labor organizations and community-based organizations to maintain worker voice throughout the planning and implementation process;

Promotion of available, good-quality jobs across the state. In the WIOA Visioning Retreat for drafting the next “Unified State” plan, participants discussed the challenges of evaluating the quality of employers in the workforce system. The required federal performance measures often indicate success but do not include any nuances about job quality. The group proposed creating a public “good list” of Illinois employers, which will include jobs that have been vetted in providing apprenticeships and effective training to workers.

Developing strategies to strengthen on-ramps into broadband. As individual regions in Illinois draft regional and local plans describing how they will implement the Workforce Innovation and Opportunity Act, the state will encourage them to develop strategies for strengthening on-ramps into broadband.⁸⁴

Engagement with labor organizations and community-based organizations. The state will continuously engage with labor organizations and community-based organizations to incorporate the worker’s voice into the planning and implementation process in the following ways:

- **Inclusive membership in the Illinois Workforce Innovation Board (IWIB).** The IWIB includes leaders from state, business, industry, labor, education, and community-based

⁸⁴ [2022 WIOA Regional and Local Planning](#), Illinois Worknet

organizations with the goal of evaluating and meeting the workforce needs of Illinois' employers and workers. Over half of the IWIB must be made up of business representatives. Membership categories include Governor and General Assembly appointments; state agencies; chief elected officials from cities and counties; labor organizations; youth activities representatives; workforce training representatives and education, including adult education; vocational rehabilitation; employment security; and other institutional representatives.⁸⁵ The IWIB convenes employers and community partners at the state, regional, and local levels to promote economic growth through these partnerships and to ensure alignment between education and workforce service.⁸⁶

- **Continuous stakeholder engagement for the development of the Unified State Plan.** To develop the Unified State Plan, the IWIB convenes all relevant programs, required partners, and stakeholders.⁸⁷ Stakeholder engagement for the development of the next State Plan is expected to start in December 2023 and to run through 2024. The state and IWIB will undertake the stakeholder engagement process every two years when drafting or modifying the Unified State Plan.

The IOB will work closely in partnership with the IWIB, BEC, and DCEO to engage labor organizations and community-based organizations in incorporating the worker's voice into the planning and implementation process.

- d. A description of how the Eligible Entity will ensure that the job opportunities created by the BEAD Program and other broadband funding programs are available to a diverse pool of workers.

The state has multiple programs to ensure that job opportunities are available to a diverse pool of workers. The main six are listed below:

- **The Illinois Works Jobs Program Act** is a statewide initiative to ensure that all Illinois residents have access to state capital projects and careers, particularly in the

⁸⁵ [WIOA State Plan Common Elements](#), 2020-2023

⁸⁶ [2020-2022 IWIB Strategic Plan](#)

⁸⁷ [Illinois Workforce Innovation Board](#), Illinois WorkNet

construction industry and building trades. The goal is to provide contracting and employment opportunities to historically underrepresented populations, including women, people of color, and veterans.⁸⁸

- **The Illinois Minority and Female Building Trades Act** requires that all construction apprenticeship programs in Illinois submit a report to the Illinois Department of Labor concerning the race, gender, ethnicity, and national origin of apprentices participating in their programs. The Illinois Department of Labor produces a report on their findings by March 31st of each year.⁸⁹
- **The Illinois Innovation Net (IIN)** provides training focusing on the inclusivity of lived experiences and ensures that students from diverse backgrounds—including Black and Indigenous people, people of color (BIPOC), and returning citizens—have access to this training.⁸²
- **The Commission on Workforce Equity and Access** was established by the governor in 2021 to create a vision for an equitable workforce system.⁹⁰ The commission has a User-Stakeholder Experience Working Group to recommend human-centered design improvements with a focus on equity and serving the needs of workers and vulnerable youths.⁹¹
- **The Re-entry Employment Service Program (RESP)**, administered by the Illinois Department of Employment Security (IDES), assists Illinois residents in overcoming barriers to employment that result from conviction or arrest.⁹² Assistance from RESP includes career development counseling and referrals to job readiness workshops, which provide instruction in writing resumés and undergoing interviews, for example. RESP also offers incentives in the form of tax savings to employers who hire ex-offenders.⁹³

⁸⁸ [Illinois Works Pre-apprenticeship Program 2023 Grantee Manual](#), IL DCEO

⁸⁹ [State construction – Minority and Female Building Trades Act](#), Illinois Department of Labor

⁹⁰ [Commission on Workforce Equity and Access](#), Illinois.gov

⁹¹ [Governor JB Pritzker’s Commission on Workforce Equity & Access](#)

⁹² [Illinois Re-Entry Employment Service Program](#), IDES Official Website

⁹³ [Document on Tax Credits for ex-felons](#) adopted from information taken from the Illinois Department of Revenue

- **The Chicago Women in Trades** and the state of Illinois were awarded \$1.3 million by the Tradeswomen Building Infrastructure grant to support the creation of equity plans and their adoption and increase women’s inclusion and equity in construction industry jobs. Funds will also allow Illinois to evaluate state and local workforce development programs for diversifying the clean energy and construction workforce.⁹⁴

To further ensure that a diverse pool of workers has access to job opportunities created by the BEAD program and other broadband funding programs, the Illinois Office of Broadband will encourage applicants to submit plans to conduct targeted outreach to populations—including but not limited to women and people of color—that have traditionally been underrepresented in broadband and information technology jobs. In the next phase of the stakeholder engagement process, the Office of Broadband will coordinate with local community organizations, worker organizations, and workforce planning agencies to make certain that a diverse set of stakeholders knows about and participates in the opportunities created by the BEAD program.

Req 2.8.2 Text Box: Describe the information that will be required of prospective subgrantees to demonstrate a plan for ensuring that the project workforce (including contractors and subcontractors) will be an appropriately skilled and credentialed workforce. These plans should include the following:

- a. The ways in which the prospective subgrantee will ensure the use of an appropriately skilled workforce, e.g., through Registered Apprenticeships or other joint labor-management training programs that serve all workers;
- b. The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials, e.g., appropriate and relevant pre-existing occupational training, certification, and licensure;
- c. Whether the workforce is unionized;
- d. Whether the workforce will be directly employed or whether work will be performed by a subcontracted workforce; and
- e. The entities that the proposed subgrantee plans to contract and subcontract with in carrying out the proposed work.

⁹⁴ [US department of labor awards \\$1.3M grant to state of Illinois to accelerate gender equity, inclusion in infrastructure workforce](#), U.S. Department of Labor

If the project workforce or any subgrantee's, contractor's, or subcontractor's workforce is not unionized, the subgrantee must also provide with respect to the non-union workforce:

- a. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce;
- b. For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
 - ii. Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other training as relevant depending on title and work), including whether there is a robust in-house training program with established requirements tied to certifications, titles; and
 - iii. Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

As outlined in Section 2.8.1, the IOB will require subgrantees to periodically file a report showing compliance with the Illinois Works Apprenticeship Initiative. In addition, the IOB will require participants in Connect Illinois with projects that cost over \$10 million to certify that they have a project labor agreement that a) has a reliable source of skilled and experienced labor and b) sets goals for minority and woman apprenticeship hours, in addition to other requirements.

Subgrantees that cannot certify having such a project labor agreement must submit a project workforce continuity plan that details, among other things, a) how the subgrantee will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to execute high-quality, timely construction throughout the project, and b) whether workers on the project will receive wages and benefits that secure an appropriately skilled workforce in a local or regional labor market.⁹⁵

The IOB will also require all subgrantees to indicate in their applications:

- The steps that will be taken to ensure that all members of the project workforce will have appropriate credentials—e.g., appropriate and relevant pre-existing occupational training, certification, and licensure.
- Whether or not the workforce they employ will be unionized

⁹⁵ [Project Labor Agreements Act](#), Illinois Compiled Statutes on the Illinois General Assembly Website

- Whether or not the workforce will be directly employed or subcontracted
- The entity with which the proposed subgrantee plans to contract and subcontract in carrying out the proposed work.

If the project workforce or any of the subgrantee's, contractor's, or subcontractor's workforce is not unionized, the IOB will require that the subgrantee also provide for the non-union workforce:

- a. The job titles and size of the workforce (FTE positions, including for contractors and subcontractors) required to carry out the proposed work over the course of the project and the entity that will employ each portion of the workforce.
- b. For each job title required to carry out the proposed work (including contractors and subcontractors), a description of:
 - i. Safety training, certification, and/or licensure requirements (e.g., OSHA 10, OSHA 30, confined space, traffic control, or other relevant training, depending on title and work) indicating whether a robust, in-house training program with established requirements is tied to certifications and titles.
 - ii. Information on the professional certifications and/or in-house training in place to ensure that deployment is done at a high standard.

The IOB will ensure that all potential applicants are informed of these requirements through stakeholder engagements.

Minority Business Enterprises (MBEs)/ Women’s Business Enterprises (WBEs)/ Labor Surplus Firms Inclusion (Requirement 13)

Req 2.9.1 Text Box: Describe the process, strategy, and the data tracking method(s) the Eligible Entity will implement to ensure that minority businesses, women-owned business enterprises (WBEs), and labor surplus area firms are recruited, used, and retained when possible.

A. Inclusion of minority businesses and woman-owned business enterprises (WBEs)

Inclusion of WBEs, MBEs and other businesses owned by marginalized groups in the state’s business operations and workforce has been a strategic priority enacted through multiple processes in Illinois over the last 30 years.⁹⁶ One of the employed strategies for the inclusion of MBEs and WBEs was the creation of the Commission on Equity and Inclusion (CEI) through the passage of the Commission on Equity and Inclusion Act (CEI). The CEI was created to expand access to state contracts for minorities, women, persons with disabilities, and veterans.⁹⁷ The CEI oversees the Business Enterprise Program (BEP), which uses multiple processes to ensure that MBEs and WBEs are recruited, used, and retained whenever possible.⁹⁸ Participation in BEP is required for subgrantees of Connect Illinois. **The multiple processes BEP employs are aligned with the affirmative steps listed in Section VII.D.7 of the NOFO.**

- **Certification process of MBEs and WBEs.** The BEP certifies businesses owned by minorities, women, and persons with disabilities that meet the following requirements: (1) 51% ownership by a minority, woman, or person with a disability; (2) 51% control by a minority, woman, or person with a disability; 3) ownership by a US citizen or legal permanent-resident alien, and (4) annual gross sales of less than \$150 million. The BEP Certification is valid for seven years for MBEs and WBEs.⁹⁹ The certification will allow

⁹⁶[The current version of the Business Enterprise Act was an amendment in 1989 that expanded the provisions on inclusion of MBEs, WBEs and businesses owned by people with disabilities in the \(30 ILCS 575/\) Business Enterprise for Minorities, Women, and Persons with Disabilities Act](#), Illinois Compiled Statutes on the Illinois General Assembly Website

⁹⁷ [State of Illinois Commission on Equity and Inclusion \(CEI\) “About” Page, CEI Official Website](#)

⁹⁸ [State of Illinois Commission on Equity and Inclusion Home page](#)

⁹⁹ [BEP Certification Overview](#), CEI Official Website

MBEs and WBEs to be listed in the CEI BEP Diversity Management System, a searchable database of certified BEP vendors. The BEP Diversity Management System increases the visibility of MBEs and WBEs and thus expands opportunities for bidding on state contracts with BEP goals. This directory is used and recognized by state procurement officials, prime vendors, and municipalities and organizations in Illinois.¹⁰⁰

- **Inclusion process for MBEs and WBEs in state contracts.** In addition to the CEI Act, Illinois passed The Business Enterprise for Minorities, Women, and Persons with Disabilities Act (30 ILCS 575), which established two aspirational goals for state contracts: 1) not less than 20% of the total dollar amount of state construction contracts may be awarded to businesses owned by minorities, women, and persons with disabilities; and 2) beyond the 20% goal for state construction contracts, not less than 30% of the total dollar amount of state construction contracts shall be awarded to businesses owned by minorities, women, and persons with disabilities.¹⁰¹ ~~Error! Bookmark not defined.~~ Connect Illinois Rd 4 will require compliance with this act for grantees who have received grant awards of \$250,000 or more, with the DCEO and the Capital Development Board ensuring compliance.⁷⁴
- **Compliance monitoring and data tracking.** The BEP has a compliance monitoring division that oversees prime contractors and subcontractors. Prime contractors and subcontractors are required to register and use BEP's Diversity Contract Monitoring System (DCMS). In addition, BEP offers the public an opportunity to file a vendor complaint if they become aware of any irregular or inappropriate activity during the procurement process as it relates to BEP.
- Through the stakeholder engagement process, the IOB will ensure that all potential subgrantees are informed of the BEP requirements and connected to the right information and resources.

¹⁰⁰ [CEI BEP Diversity Management System](#), CEI Website

¹⁰¹ [30 ILCS 575 /0.01](#) (from Ch. 127, par. 132.600); Business Enterprise for Minorities, Women and Persons with disabilities Act, Illinois General Assembly

B. Inclusion of labor surplus area firms

The Illinois Department of Unemployment Security updates the list of labor surplus areas every fiscal year.¹⁰² As of the drafting of this report, 10 areas in Illinois have an average unemployment rate at least 20 percent above the average rate for the entire state and thus are categorized as “labor surplus areas.” The IOB will leverage resources through the DCEO and other existing partnerships to increase awareness and accessibility to contracting opportunities for firms in labor surplus areas. The IOB will also ensure that potential subgrantees are informed of LSA firms and connected to the right information.

Req 2.9.2. Check Box: Certify that the Eligible Entity 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 following outlined on pages 88 – 89 of the BEAD NOFO:

- a. Placing qualified small and minority businesses and women’s business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women’s business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women’s business enterprises;
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women’s business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

The Eligible Entity must certify, by checking a box, that it plans to take necessary affirmative steps to ensure MBEs, WBEs, and labor surplus area firms are recruited, used, and retained, when possible.

¹⁰² [Labor surplus areas in Illinois](#), Illinois Department of Unemployment Security

The Office of Broadband certifies that it will take all necessary affirmative steps to ensure that minority businesses, women's business enterprises, and labor surplus area firms are used when possible, including the following outlined on pages 88 – 89 of the BEAD NOFO.

- a. Placing qualified small and minority businesses and women's business enterprises on solicitation lists;
- b. Assuring that small and minority businesses, and women's business enterprises are solicited whenever they are potential sources;
- c. Dividing total requirements, when economically feasible, into smaller tasks or quantities to permit maximum participation by small and minority businesses, and women's business enterprises
- d. Establishing delivery schedules, where the requirement permits, which encourage participation by small and minority businesses, and women's business enterprises;
- e. Using the services and assistance, as appropriate, of such organizations as the Small Business Administration and the Minority Business Development Agency of the Department of Commerce; and
- f. Requiring subgrantees to take the affirmative steps listed above as it relates to subcontractors.

Cost and Barrier Reduction (Requirement 14)

Req 2.10.1 Text Box: Identify steps that the Eligible Entity has taken or will take to reduce costs and barriers to deployment. Responses may include but not be limited to the following:

- a. Promoting the use of existing infrastructure;
- b. Promoting and adopting dig-once policies;
- c. Streamlining permitting processes;
- d. Streamlining cost-effective access to poles, conduits, easements; and
- e. Streamlining rights of way, including the imposition of reasonable access requirements.

The Illinois Office of Broadband considers the reduction of costs and mitigation of barriers to broadband deployment to be a top priority. Detailed below are the steps the state has implemented to date:

Promoting and adopting “dig-once” policies. The Illinois Dig Once Act, a policy aimed at reducing the scale and number of repeated excavations related to roads, highways, tollways, and expressways for the installation and maintenance of broadband infrastructure and public utilities in rights of way, was approved by the Governor of Illinois on July 28, 2023.¹⁰³ This act will provide ready-made, buried conduits that could allow future providers to install fiber more easily and cheaply by threading it through existing conduits.

Streamlining rights of way and access to easements. The Illinois Office of Broadband recognizes that streamlining rights of way and access to easements is extremely important to providers. The IOB, through the University of Illinois Urbana-Champaign extension, hosts webinar series that bring officials from state organizations—such as Township Officials of Illinois (TOI) and the Illinois Farm Bureau (IFB)—to offer guidance on easements and right-of-way issues.¹⁰⁴ During these sessions, officials and facilitators promote resources that have been created to streamline access requirements. One example is a permit template developed by TOI, IFB, and the Illinois Association of County Engineers.¹⁰⁵ In addition, the IOB may create a webpage that displays a

¹⁰³ [Illinois Dig Once Act - SB 1438](#), Illinois General Assembly

¹⁰⁴ [Illinois Broadband Lab Summer Webinar Series](#)

¹⁰⁵ [Township/County Utility Permit](#)

streamlined list of needed permits, contact information for a designated official who can answer inquiries, and information on community/local programs and events.

Promoting the use of existing infrastructure. Building on existing infrastructure helps the State of Illinois to effectively and economically expand broadband access in unserved and underserved communities. Consequently, the state recognizes promoting the use of existing infrastructure as a priority. Illinois benefits from having a robust inventory of the assets needed to close the digital divide. This inventory includes hard assets like the Illinois Century Network, towers, buildings, and utility poles.¹⁰⁶ By emphasizing cost efficiency in project applications—that is, assigning 45% of the scoring rubric to minimizing the BEAD outlay—the IOB aims to incentivize providers to maximize the use of current infrastructure assets.

In addition to the already implemented steps above, the IOB plans to do the following:

Streamline the permitting process. The Illinois Office of Broadband will work closely with partners (such as the University of Illinois extension) to provide technical assistance through online postings and informational sessions. This step will help to simplify the permitting process for providers and will ensure that questions or concerns are addressed in promptly and effectively.

One best practice in helping local communities to become "broadband-ready" is a certification program. Accordingly, the IOB plans to support interested local governments in promoting broadband preparation and potential certifications so that counties may be certified as "broadband-ready." If this best practice is adopted, the IOB will have the following duties:

- Publishing a comprehensive guide on all permits required for broadband projects
- Partnering with state and local government offices, administrative bodies, and relevant departments to enable timely permit approvals

¹⁰⁶ [Connect Illinois Five Year Action Plan](#)

- Facilitating coordination among local, state, and federal agencies on activities related to application approval and permit issuance for broadband projects.

To be certified as broadband-ready, counties should adopt several best practices:

- Providing a dedicated point of contact to manage all inquiries, coordination, and issues related to broadband projects
- Committing to review and decide on all permit applications within 20 business days of submission
- Ensuring that required inspections will be scheduled and completed promptly based on construction timelines
- Enabling all necessary forms, applications, and documents to be submitted and signed electronically for efficiency.

Climate Assessment (Requirement 15)

Req 2.11.1 Text Box: Describe the Eligible Entity’s assessment of climate threats and proposed mitigation methods. If an Eligible Entity chooses to reference reports conducted within the past five years to meet this requirement, it may attach this report and must provide a crosswalk narrative, with reference to page numbers, to demonstrate that the report meets the five requirements below. If the report does not specifically address broadband infrastructure, provide additional narrative to address how the report relates to broadband infrastructure. At a minimum, this response must clearly do each of the following, as outlined on pages 62-63 of the BEAD NOFO:

- a. Identify the geographic areas that should be subject to an initial hazard screening for current and projected future weather and climate-related risks and the time scales for performing such screenings;
- b. Characterize which projected weather and climate hazards may be most important to account for and respond to in these areas and over the relevant time horizons;
- c. Characterize any weather and climate risks to new infrastructure deployed using BEAD Program funds for the 20 years following deployment;
- d. Identify how the proposed plan will avoid and/or mitigate weather and climate risks identified; and
- e. Describe plans for periodically repeating this process over the life of the Program to ensure that evolving risks are understood, characterized, and addressed, and that the most up-to-date tools and information resources are utilized.

A. Initial hazard screening of vulnerable areas

The state of Illinois has developed an initial hazard screening process. The counties listed in Table 10 below have been identified as vulnerable to current and projected weather and climate-related risks. The analysis will be reviewed annually to add updated information, and a full screening analysis will be completed every five years.

The IOB refers to the Draft 2023 Illinois Natural Hazard Mitigation Plan published by the Illinois Emergency Management Agency (IEMA) to identify vulnerable counties.¹⁰⁷ The Illinois 2023

¹⁰⁷ [Draft 2023 Illinois Natural Hazard Mitigation](#)

Natural Hazard Mitigation Plan was developed in accordance with the recent guidance by the Federal Emergency Management Agency (FEMA) and with the involvement of multiple stakeholders. Pages 127 to 132 of the Draft 2023 Illinois Natural Hazard Mitigation Plan determined the overall risk ranking level of 18 hazards for all counties in Illinois, based on their current population, past hazard occurrence, exposure of population, population growth, severity of impact, and social vulnerability.¹⁰⁸ Counties were assigned an overall hazard risk ranking of very low, low, medium, high or very high. The IOB classifies **the counties most vulnerable** to a particular hazard as those that have an overall risk ranking of “high” or “very high” risk. High- or very high-risk counties have a high or very high current population, more than 20 past occurrences of hazards from 1996 to 2021, more than 15% of population affected by past hazards, a projected population increase by 2030, more than \$10,000,000 in infrastructure damage or five fatalities due to a hazard, and a high social vulnerability to a hazard. Table 10 summarizes the counties that were categorized as high-risk or very high-risk.

Table 10: Counties at high or very high risk for each hazard¹⁰⁸

Weather or climate hazard	Counties at high risk	Counties at very high risk
Drought	Champaign, Coles, De Witt, Jackson	None
Earthquake	None	None
Cold Wave	Champaign, Coles, Cook, De Witt, Winnebago, Kane, Jackson, Kankakee, St. Clair, Will	None
Heat Wave	Alexander, Bond, Brown, Coles, Champaign, De Witt, Fayette, Franklin, Jefferson, Kane, Kankakee, Madison, Marion, Massac, Perry, Pope, Pulaski, Saline, Union, Wabash, Wayne, Williamson, Winnebago	Cook, Jackson, St. Clair
Coastal Flooding	None	Cook

¹⁰⁸ [Draft 2023 Illinois Natural Hazard Mitigation](#), page 127

Dam/Levee Failure	None	None
Flash Flooding	Carroll, Cass, Christian, De Witt, Douglas, Ford, Grundy, Henry, Jackson, Jefferson, Jo Daviess, Kankakee, Lawrence, Madison, Marion, Marshall, McDonough, Perry, Rock Island, Saline, Schuyler, St. Clair, Stephenson, Union, Vermilion, Wayne, Williamson	Champaign, Clay, Coles, Cook, DuPage, Franklin, Fulton, Kane, Knox, La Salle, Lake, Macon, McLean, Morgan, Peoria, Sangamon, Tazewell, Will, Winnebago, Woodford
Riverine Flooding	Alexander, Champaign, Coles, Cook, De Witt, Douglas, Franklin, Gallatin, Kane, Kankakee, La Salle, Lawrence, Madison, McDonough, McHenry, Peoria, Pope, Pulaski, Rock Island, Saline, Stephenson, Tazewell, Union, Vermilion, Wabash, Wayne, Woodford	Jackson, Massac, St. Clair, Winnebago
Landslide	None	None
Mine Subsidence	La Salle, St. Clair	None
Pandemic	Champaign, Coles, De Witt, Jackson, Kane, Kankakee, La Salle, St. Clair, Winnebago,	None
Hail	DuPage, Fayette, Franklin, Fulton, Henderson, Jackson, Jefferson, Johnson, Kane, Knox, Lake, Lawrence, Logan, Macon, Macoupin, Madison, Marion, Massac, McDonough, McHenry, Morgan, Moultrie, Ogle, Peoria, Perry, Pope, Pulaski, Rock Island, Saline, Schuyler, St. Clair, Stephenson, Union, Vermilion, Wabash, Warren, Wayne, Will, Williamson, Winnebago	Douglas, Kankakee, La Salle, Sangamon
Lightning	None	None
Wind	Alexander, Bond, Boone, Brown, Bureau, Cass, Clay, Coles, De Witt, Douglas, DuPage, Fayette, Gallatin, Grundy, Hardin, Henry, Kane, Kankakee, Knox, Lake, Lawrence, Logan, Macon, Madison, Marion, McDonough, McHenry, McLean, Mercer, Morgan, Ogle, Peoria, Perry, Pope, Pulaski, Rock Island,	Champaign, Cook, Franklin, Jackson, Jefferson, Massac, St. Clair, Vermilion, Williamson, Winnebago

	Saline, Sangamon, Schuyler, Stephenson, Tazewell, Union, Wabash, Warren, Wayne, Will	
Tornado	Bond, Boone, Christian, Clinton, Douglas, DuPage, Fayette, Grundy, Henry, Iroquois, Jefferson, Kane, Knox, Lake, Livingston, Logan, Marion, Massac, McHenry, McLean, Morgan, Ogle, Peoria, Randolph, Rock Island, Schuyler, Union, Wabash, Warren, Wayne, Williamson, Winnebago	Champaign, Coles, Cook, De Witt, Fulton, Jackson, Kankakee, La Salle, Macon, Madison, Sangamon, St. Clair, Tazewell, Vermilion, Will, Woodford
Wildfire	None	None
Ice Storms	Champaign, De Witt	None
Winter Storms	Bond, Boone, Brown, Cass, Champaign, Christian, Clay, Coles, Cook, De Witt, Douglas, DuPage, Fayette, Franklin, Hardin, Jackson, Jefferson, Kane, Kankakee, Knox, La Salle, Lake, Lawrence, Macon, Macoupin, Madison, Marion, McDonough, McHenry, Morgan, Ogle, Peoria, Perry, Rock Island, Saline, Sangamon, Schuyler, St. Clair, Stephenson, Union, Vermilion, Wabash, Warren, Wayne, Will, Williamson, Winnebago	Alexander, Massac, Pope, Pulaski

B. Weather and climate hazards with the most impact

The IOB has identified six weather and climate hazards that require the highest urgency in preparation and response based on the following: 1) more than 30% of counties in Illinois are at “high” or “very high” risk of being affected by these hazards, and 2) the state has incurred a billion dollars or more in overall losses and/or high costs in cumulative property damages over the years:

1. **Flooding.**¹⁰⁹ Flooding is the most common hazard that occurs in the US. The 2023 Draft of the Illinois Natural Hazard Mitigation Plan identifies 36 counties in Illinois as being at high risk and 23 counties as being at very high risk for coastal, riverine, and flash flooding.¹⁰⁸ According to the Illinois Emergency Management Agency (IEMA), since 1981, 99 of the 102 counties in Illinois have been declared at the time as major disaster areas due to flooding. In addition, flooding has cost the state between five and ten billion dollars, which accounts for 18.1% of the total cost of billion-dollar disasters in the state from 1980 to 2023.¹¹⁰ The Nature Conservancy reports that 41 counties in the state of Illinois are projected to experience a rise in flood risk of more than 5% from 2020 to 2050 (in terms of flood damage in 2020 US dollars).¹¹¹
2. **Severe storms.** Severe storms are typically defined to include wind, hail, and tornadoes. All counties in Illinois are susceptible to severe storms. The NOAA has determined that severe storms have played a significant role in billion-dollar disasters in Illinois. From 1980 to 2023, they have cost the state between 20 to 50 billion dollars, which is 43% of the total costs of billion-dollar disasters in the state.¹¹⁰ The Nature Conservancy has projected an increase in annual precipitation throughout Illinois, which is likely to increase the number of severe storms in the state.^{107,111}
 - a. **Wind.** Illinois averages around 860 reports of wind and large hail annually. The 2023 Draft of the Illinois Natural Hazard Mitigation Plan has identified 46 counties as being at high risk and 10 counties at extremely high risk for the effects of wind.¹⁰⁷ Since 1996, wind has caused \$648,035,400 in damages to property in the state.¹¹¹
 - b. **Hail.** The 2023 Draft of the Illinois Natural Hazard Mitigation Plan has identified 40 counties as being at high risk and four counties as being at extremely high risk for the effects of hail. Since 1996, hail has caused \$219, 512, 600 in property damages in the state.¹⁰⁷

¹⁰⁹ Includes coastal flooding, flash flooding, and riverine flooding.

¹¹⁰ [NOAA Illinois summary for Billion Dollar Weather and Climate Disasters](#)

¹¹¹ Chapter 2 of [An Assessment of the Impacts of Climate Changes in Illinois](#) by The Nature Conservancy, 2021

c. **Tornadoes.** The 2023 Draft of the Illinois Natural Hazard Mitigation Plan has identified 32 counties as being at high risk and 16 counties at very high risk of being affected by tornadoes. Since 1996, tornadoes have caused three billion dollars in property damage, making tornadoes one of the costliest hazards to the state.¹⁰⁷

3. **Winter storms.** On average, Illinois experiences around 24.6 winter storm events per year. At least 50% of counties in Illinois are at risk of experiencing winter storms, with 47 identified as being at high risk and four at extremely high risk.¹⁰⁸ In addition, winter storms typically have a significant impact on the state. They are classified by the NOAA as a billion-dollar disaster, having cost the state around two to five billion dollars—accounting for 4.4% of the total cost of billion-dollar disasters in Illinois—from 1980 to 2023.¹¹⁰

C. Weather and Climate Risks to New Infrastructure and Mitigation Measures

Based on research conducted using the links provided by the NTIA, the IOB believes that all climate risks mentioned above present risks to new infrastructure funded by the BEAD program. The impact of each weather and climate risk on broadband infrastructure and proposed mitigation strategies are summarized in Table 11 below.

Table 11. Weather and climate risk to new infrastructure and proposed mitigation plan

Weather and climate risk	Risk to new infrastructure	Proposed mitigation strategy
Flooding	Could damage buried and underground plant, central office, and CPE	Selection of a technology platform suitable to the region’s climate risks, reliance on alternative siting of facilities
Severe storms – Hail	Could pose some risk to aerial plant and exposed CPE	Prompt restoration of service in the event of an outage
Severe storms – Wind	Could pose some risk to aerial plant and exposed CPE	Prompt restoration of service in the event of an outage
Severe storms – Tornado	Could damage aerial plant, exposed CPE, and central office equipment	Use of established plans and processes to deal with extreme weather-related risks

Winter storms	Could pose some risk to aerial plant, buried plant, and exposed CPE	Use of established plans and processes to deal with extreme weather-related risks Prompt restoration of service in the event of an outage
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For subgrantees with applications in the high-risk or extremely high-risk counties cited above, the Illinois Office of Broadband will require providers to submit a proposed mitigation strategy that considers the IOB’s perspective on mitigation approaches and either accepts that perspective or provides alternate approaches to mitigating risks. These proposed mitigation strategies will be reviewed as part of each application. The IOB will also require providers to submit an emergency response plan and communication strategy to ensure timely, effective response to extreme weather events.

D. Periodic plan review

Throughout the program, the Illinois Office of Broadband will repeat the above screening process every 10 years using the latest resources and information. This review will ensure that evolving risks are understood, characterized, and addressed, and that the latest tools and information are applied.

Req 2.11.1.1 Optional Attachment: As an optional attachment, submit any relevant reports conducted within the past five years that may be relevant for this requirement and will be referenced in the text narrative above.

The IOB will attach the Draft 2023 Illinois Natural Hazard Mitigation Plan.

Low-Cost Broadband Service Option (Requirement 16)

Req 2.12.1 Text Box: Describe the low-cost broadband service option(s) that must be offered by subgrantees as selected by the Eligible Entity, including why the outlined option(s) best services the needs of residents within the Eligible Entity’s jurisdiction. At a minimum, this response must include a definition of low-cost broadband service option that clearly addresses the following, as outlined on page 67 of the BEAD NOFO:

- a. All recurring charges to the subscriber, as well as any non-recurring costs or fees to the subscriber (e.g., service initiation costs);

The plan’s basic service characteristics (download and upload speeds, latency, any limits on usage or availability, and any material network management practices);

Whether a subscriber may use any Affordable Connectivity Benefit subsidy toward the plan’s rate; and

Any provisions regarding the subscriber’s ability to upgrade to any new low-cost service plans offering more advantageous technical specifications.

The state intends to adopt the low-cost broadband service option defined below and outlined in the BEAD NOFO and in Figure 8 of the BEAD Initial Proposal Guidance.¹¹²

1. The proposed service option:
 - a. Costs \$30 per month or less, inclusive of all taxes, fees, and charges if the subscriber does not reside on Tribal Lands, or \$75 per month or less, inclusive of all taxes, fees, and charges if the subscriber resides on Tribal Lands, with no additional non-recurring costs or fees to the consumer;
 - b. Allows the end user to apply the Affordable Connectivity Benefit subsidy to the service price;
 - c. Provides the greater of (a) typical download speeds of at least 100 Mbps and typical upload speeds of at least 20 Mbps, or the fastest speeds the infrastructure is capable

¹¹² [BEAD Initial Proposal Guidance](#), Requirement 16.

- of if less than 100 Mbps/20 Mbps or (b) the performance benchmark for fixed terrestrial broadband service established by the Federal Communications Commission pursuant to Section 706(b) of the Communications Act of 1934, as amended;
- d. Provides typical latency measurements of no more than 100 milliseconds; and
 - e. Is not subject to data caps, surcharges, or usage-based throttling, and is subject only to the same acceptable use policies to which subscribers to all other broadband internet access service plans offered to home subscribers by the participating subgrantee must adhere;
 - f. In the event the provider later offers a low-cost plan with higher speeds downstream and/or upstream, permits Eligible Subscribers that are subscribed to a low-cost broadband service option to upgrade to the new low-cost offering at no cost
2. Subgrantees are required to participate in the Affordable Connectivity Program or any successor program, and Eligible Subscribers that are eligible for a broadband service subsidy can apply the subsidy to the proposed service option

Req 2.12.2 Check Box: [Certify that all subgrantees will be required to participate in the Affordable Connectivity Program or any successor program.](#)

Yes, the Illinois Office of Broadband will require all subgrantees to participate in the Affordable Connectivity Program or any successor program.

Use of 20 Percent of Funding (Requirement 17)

Req 2.14.1 Text Box: Describe the Eligible Entity’s planned use of any funds being requested, which must address the following:

- a. If the Eligible Entity does not wish to request funds during the Initial Proposal round, it must indicate no funding requested and provide the rationale for not requesting funds.
- b. If the Eligible Entity is requesting less than or equal to 20 percent of funding allocation during the Initial Proposal round, it must detail the amount of funding requested for use upon approval of the Initial Proposal, the intended use of funds, and how the proposed use of funds achieves the statutory objective of serving all unserved / underserved locations.
- c. If the Eligible Entity is requesting more than 20 percent (up to 100 percent) of funding allocation during the Initial Proposal round, it must detail the amount of funding requested for use upon approval of the Initial Proposal, the intended use of funds, how the proposed use of funds achieves the statutory objective of serving all unserved / underserved locations, and provide rationale for requesting funds greater than 20 percent of the funding allocation.

Illinois’ allocation is \$1,040,420,751.50. The state is requesting an allocation of 100% to eliminate the digital divide by 2029. The state intends to use the BEAD funding on deployment activities, administrative costs, and programmatic expenses. As described in Section 2.4, the state will run a BEAD compliant subgrantee process, which will inform the use of BEAD funding on deployment activities. See the Connect Illinois Final Proposal for more details.

Req 2.14.2 Financial Data Entry: Enter the amount of the Initial Proposal Funding Request. If not requesting Initial Proposal funds, enter ‘\$0.00.’

Illinois will request \$1,040,420,751.50.

Req 2.14.3 Check Box: Certify that the Eligible Entity will adhere to BEAD Program requirements regarding Initial Proposal funds usage. If the Eligible Entity is not requesting funds in the Initial Proposal round and will not submit the Initial Proposal Funding Request, note “Not applicable.”

The state of Illinois and IOB certifies that they will adhere to the BEAD Program requirements regarding Initial Proposal funds usage.

Eligible Entity Regulatory Approach (Requirement 18)

Req 2.15.1 Text Box:

- a. Disclose whether the Eligible Entity will waive all laws of the Eligible Entity concerning broadband, utility services, or similar subjects, whether they predate or postdate enactment of the Infrastructure Act that either (a) preclude certain public sector providers from participation in the subgrant competition or (b) 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.
- b. If the Eligible Entity will not waive all such laws for BEAD Program project selection purposes, identify those that it will not waive (using the Excel attachment) and their date of enactment and describe how they will be applied in connection with the competition for subgrants. If there are no applicable laws, note such.

The IOB is not aware of any laws in Illinois concerning broadband, utility services, or similar subjects—whether they predate or postdate enactment of the Infrastructure Act—that either (a) preclude certain public-sector providers from participating in the subgrant competition or (b) 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.

Req 2.15.11 Optional Attachment: As a required attachment only if the Eligible Entity will not waive laws for BEAD Program project selection purposes, provide a list of the laws that the Eligible Entity will not waive for BEAD Program project selection purposes, using the Eligible Entity Regulatory Approach template provided.

Not applicable.

Certification of Compliance with BEAD Requirements (Requirement 19)

Req 2.16.1 Check Box: Certify the Eligible Entity's intent to comply with all applicable requirements of the BEAD Program, including the reporting requirements.

The state of Illinois will comply with all applicable requirements of the BEAD Program, including the reporting requirements.

Req 2.16.2 Text Box: Describe subgrantee accountability procedures, including how the Eligible Entity will, at a minimum, employ the following practices outlined on page 51 of the BEAD NOFO:

- a. Distribution of funding to subgrantees for, at a minimum, all deployment projects on a reimbursable basis (which would allow the Eligible Entity to withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize);
- b. The inclusion of clawback provisions (i.e., provisions allowing recoupment of funds previously disbursed) in agreements between the Eligible Entity and any subgrantee;
- c. Timely subgrantee reporting mandates; and
- d. Robust subgrantee monitoring practices.

A. Distribution of funding to subgrantees on a reimbursable basis

Distribution of funding to subgrantees under Connect Illinois Rd 4 will occur on a reimbursement basis and the state will withhold funds if the subgrantee fails to take the actions the funds are meant to subsidize.

B. Inclusion of claw back provisions

Connect Illinois Rd 4 will include clawback provisions allowing recoupment of funds previously disbursed based on performance.

C. Timely subgrantee reporting mandates

Connect Illinois Rd 4 will implement following reporting regime (identical to previous rounds of Connect Illinois), which is in compliance with the BEAD requirements:

Periodic Performance Report (PPR) and Periodic Financial Report (PFR). Subgrantees will be required to submit at least on a quarterly basis both the PPR and PFR to their assigned grant manager. The first set of reports is to cover the first three months after the awards begins. Pursuant to 2 CFR 200.328, PFR's shall be submitted no later than 30 calendar days following the period covered by the report. Grantees will also be required to submit a final closeout report within 45 calendar days following the end of the period of performance.

Project Reporting. Grantees will be required to submit regular reports to document the progress of the project as part of the grant requirements. These reports include but are not limited to:

- Projected/actual construction start date (month/year)
- Projected/actual initiation of operations date (month/year)
- Location (for broadband, geospatial location data);
- Speeds/pricing tiers to be offered, including the speed/pricing of its affordability offering;
- Technology to be deployed;
- Miles of fiber;
- Cost per mile;
- Cost per passing;
- Number of households (broken out by households on Tribal lands and those not on Tribal lands) projected to have increased access to broadband meeting the minimum speed standards in areas that previously lacked access to service of at least 25 Mbps download and 3 Mbps upload;
- Number of households with access to minimum speed standard of reliable 100 Mbps symmetrical upload and download;
- Number of households with access to minimum speed standard of reliable 100 Mbps download and 20 Mbps upload;
- Number of institutions and businesses (broken out by institutions on Tribal lands and those not on Tribal lands) projected to have increased access to broadband meeting the

minimum speed standards in areas that previously lacked access to service of at least 25 Mbps download and 3 Mbps upload, in each of the following categories: business, small business, elementary school, secondary school, higher education institution, library, healthcare facility, and public safety organization

- a. Specify the number of each type of institution with access to the minimum speed standard of reliable 100 Mbps symmetrical upload and download; and
 - b. Specify the number of each type of institution with access to the minimum speed standard of reliable 100 Mbps download and 20 Mbps upload.
- For projects with total projects costs over \$10 million:
 - a. Grantee may provide a certification that a project includes a project labor agreement, meaning a pre-hire collective bargaining agreement consistent with section 8(f) of the National Labor Relations Act (29 U.S.C. 158(f)) and the Illinois Project Labor Agreements Act (30 ILCS 571). Grantee will provide a copy of the project labor agreement. A project labor agreement must
 - Set forth mutually binding procedures for resolving jurisdictional labor disputes and grievances;
 - Guarantee against strikes, lockouts, or similar actions;
 - Ensure a reliable source of labor;
 - Set goals for woman and minority apprenticeship hours;
 - Permit the selection of the lowest responsible bidder, regardless of union status;
 - Bind all contractors and subcontractors through the inclusion of bid specifications in all relevant bid documents; and
 - Be signed by a bona fide labor organization. Grantee will provide contact information for the bona fide labor organization.
 - b. Grantee must maintain sufficient records to substantiate this information upon request.

- c. If the Grantee does not provide such certification, Grantee must provide a Project Workforce Continuity Plan, detailing:
- How the Grantee will ensure the project has ready access to a sufficient supply of appropriately skilled and unskilled labor to ensure high-quality and timely construction throughout the life of the project;
 - How the Grantee will minimize risks of labor disputes and disruptions that would jeopardize timeliness and cost-effectiveness of the project;
 - How the Grantee will resolve jurisdictional labor disputes and grievances;
 - How the Grantee will provide a safe and healthy workplace that avoids delays and costs associated with workplace illnesses, injuries, and fatalities;
 - How the Contractor will ensure that the lowest responsible bidder is chosen for the project;
 - How the Grantee will ensure that all contractors and subcontractors are bound by the Project Workforce Continuity Plan;
 - Whether workers on the project will receive wages and benefits that secure an appropriately skilled workforce in the context of a local or regional labor market;
 - Whether the project prioritizes local hires; and
 - Whether the project has a Community Benefit Agreement, with a description of any such agreement.

D. Robust subgrantee monitoring practices

Connect Illinois Rd 4 will also implement the same monitoring requirements as previous rounds which comply with BEAD requirements. Subgrantees will be subject to fiscal and programmatic monitoring visits by the DCEO in accordance with 2 CFR 200.337. They will be required to have an open-door policy allowing periodic visits by Department monitors to evaluate the progress of the project and provide documentation upon request of the monitor. Program staff will also maintain contact with participants and monitor progress and performance of the contracts. The IOB will retain the option to modify grants based on performance.

Req 2.16.3 Check Box: Certify that the Eligible Entity will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.

The state of Illinois will account for and satisfy authorities relating to civil rights and nondiscrimination in the selection of subgrantees.

Req 2.16.4 Check Box: Certify that the Eligible Entity will ensure subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO to require prospective subgrantees to attest that:

Cybersecurity

1. The prospective subgrantee has a cybersecurity risk management plan (the plan) in place that is either: (a) operational, if the prospective subgrantee is providing service prior to the award of the grant; or (b) 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 the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days.

Supply Chain Risk Management (SCRM)

1. The prospective subgrantee has a SCRM plan in place that is either: (a) operational, if the prospective subgrantee is already providing service at the time of the grant; or (b) 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 the Eligible Entity prior to the allocation of funds. If the subgrantee makes any substantive changes to the plan, a new version will be submitted to the Eligible Entity within 30 days. The Eligible Entity must provide a subgrantee's plan to NTIA upon NTIA's request.

The state of Illinois will ensure subgrantee compliance with the cybersecurity and supply chain risk management requirements on pages 70 - 71 of the BEAD NOFO.

Middle Class Affordability (Requirement 20)

Req 2.13.1 Text Box: Describe a middle-class affordability plan that details how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network's service area at reasonable prices. This response must clearly provide a reasonable explanation of how high-quality broadband services will be made available to all middle-class families in the BEAD-funded network's service area at reasonable prices.

Offering middle-class households affordable, high-quality broadband service is a priority for the Illinois Office of Broadband.

In Illinois, the middle-class income ranges from \$48,136 to \$144,410, based on Pew Research Center's definition of "middle-class" as households with annual incomes that are two thirds to twice the median household income, which, according to the ACS 2021 survey, is \$72,205 per year.^{113,114}

According to the Broadband Commission for Sustainable Development (BCSD), a threshold of 2% of monthly income is considered affordable for a broadband plan.¹¹⁵ This amounts to a monthly broadband cost of \$100 - \$290 per household that is deemed affordable. As such, the reference price of \$100 for symmetrical 1 Gbps service and \$30 for 100/20Mbps have been designated as within the price range considered to be affordable for middle-class households.

The middle-class affordability plan will include the following¹¹⁶:

Assigning especially high weights to selection criteria relating to affordability and evaluating providers based the price they offer for a variety of speed tiers. As detailed in Req. 2.4.2.1 of this Initial Proposal, affordability will comprise 30% of the scoring criteria. Providers will be scored based on the price they offer for four speed tiers: 1G/1G with a reference price at \$100, 500/100Mbps with a reference price at \$80, 100/100Mbps with a reference price at \$50, and 100/20Mbps with a reference price at \$30. The inclusion of all four speed tiers in the

¹¹³ [Middle-class Calculator](#), Pew Research Center, July 2020

¹¹⁴ [Illinois Annual Income](#), ACS 1-Year Estimate, 2021

¹¹⁵ [The State of Broadband: Broadband as a Foundation for Sustainable Development](#), BCSD, Sept. 2019

¹¹⁶ [BEAD NOFO Section IV.C.2.i.c](#), Middle-class affordability plan

affordability criterion is to motivate providers to offer affordable high-speed plans, in addition to the 1G/1G symmetrical option.

Establishing a regime of continued monitoring and public reporting to ensure that high-speed internet connections are affordable for middle-class households in Illinois. The Illinois Office of Broadband plans to require subgrantees to report prices for various speed levels. The office has identified some best practices for establishing a regime of continued monitoring and public reporting:

1. **Project reporting requirement.** As part of the grant process, the state will include a clause that requires internet service providers (ISPs) to report their full prices (without discounts and including fees and other charges) and speed levels for all offered speeds to the Illinois Broadband Office on a semi-annual basis.
2. **Data collection.** A platform where ISPs can submit data on a semi-annual basis, as agreed.
3. **Public reporting.** A user-friendly website to publicly report the verified data and to publish and present the data clearly for consumers to access.
4. **Data validation.** A mechanism that enables consumers to directly challenge published prices and speeds on the website.
5. **Data update.** A system to ensure that the data is collected on time and regularly updated, such as automated email reminders.
6. **Transparency and accessibility.** Publicizing the website through social media, press releases, and community outreach programs.

The office may work in partnership with local organizations and institutions, such as the University of Chicago, to execute the above best practices.