

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Communications Division  
Broadband, Video and Market Branch**

**RESOLUTION T-17786  
June 29, 2023**

**RESOLUTION**

**Resolution T-17786: Approves one project proposal for \$135,625 and conditional approval of one project proposal for \$27,030 from the California Advanced Services Fund Broadband Adoption Account submitted in the January 2023 application round.**

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**I. Summary**

This Resolution approves grant funding in the amount of \$135,625 from the California Advanced Services Fund (CASF) Broadband Adoption Account (Adoption Account) to Great Beginnings for Black Babies, Inc. (GBBB) (digital literacy project for its Healthy Moms and Babies Program) and conditional approval of grant funding in the amount of \$27,030 to Nü Communications Alliance (NCA) (one digital literacy project). These two projects will provide digital literacy training to 400 participants.

**II. Background**

On October 15, 2017, Governor Brown signed Assembly Bill (AB) 1665 (Garcia) into law. This legislation amended the statutes governing the CASF program, Public Utilities Code sections 281, 912.2, and 914.7, and added the Adoption Account, which provides grants to increase publicly available or after school broadband access and digital inclusion and allocated \$20 million to the account. Eligible applicants include local governments, senior centers, schools, public libraries, non-profit organizations, and community-based organizations with programs to increase publicly available or after-school broadband access and digital inclusion. The California Public Utilities Commission (Commission) is required to give preference to programs in communities with demonstrated low broadband access, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption.

On June 21, 2018, the Commission issued Decision (D).18-06-032 which implemented provisions of AB 1665 and adopted rules and guidelines for the Adoption Account (Adoption Account Guidelines). On February 21, 2019, the Commission issued D.19-02-008 modifying and clarifying the Adoption Account Guidelines.

In 2021, the Legislature deleted the minimum cumulative appropriation for each of the CASF accounts and authorized the Commission to recommend to the Legislature these appropriation amounts.<sup>1</sup> Consequently, the Commission issued D.22-05-029 which set an appropriation amount of \$20.024 million for fiscal year 2022/2023 for the Adoption Account. This appropriation was adopted in the 2022 California Budget Act.<sup>2</sup> In D.22-05-029, the Commission made further modifications and programmatic changes to the Adoption Account Guidelines. Key provisions of the Decision relevant to this Resolution include:

- *Moneys in the Adoption Account are available to the Commission to award grants to increase publicly available or after-school broadband access and digital inclusion, such as grants for digital literacy training programs and public education to communities with limited broadband adoption, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption;*<sup>3</sup>
- *Eligible applicants are local governments, senior centers, schools, public libraries, nonprofit organizations, and community-based organizations with programs to increase publicly available or after school broadband access and digital inclusion, such as digital literacy training programs;*<sup>4</sup>
- *Reimbursement for mobile hotspots used in community training rooms or other public spaces such as local government centers, senior centers, schools, public libraries nonprofit organizations, and community-based organizations or used by individuals in locations where no inside network exists, is limited to a cap of \$300 per device and \$20,000 per project.*<sup>5</sup>
- *The Commission assigned Commission Division (CD) staff (Staff) the task of approving applications that meet the criteria for ministerial review;*
- *Nonprofit organizations that have not existed for one year or more do not qualify for ministerial review;*
- *Organizations who do not have at least one year's experience conducting a digital literacy training or broadband access project or who have not completed at least one digital literacy training or broadband access project do not qualify for ministerial review.*
- *Where an application does not meet the ministerial review criteria, it may still be considered for a grant, but it must go through the traditional Commission Resolution approval process.*<sup>6</sup>

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<sup>1</sup> Public Utilities Code section 281, subdivision (d)(3).

<sup>2</sup> <https://www.ebudget.ca.gov/>.

<sup>3</sup> See D.22-05-029, Slip. Op., Section I (Appendix 2).

<sup>4</sup> See D.22-05-029, Slip. Op., Section IV (Appendix 2).

<sup>5</sup> See D.22-05-029, Slip. Op., Section VI (Appendix 2).

<sup>6</sup> See D.22-05-029, Slip. Op., Section XI (Appendix 2).

Projects eligible for grant funding include digital literacy projects and may include digital literacy training programs and public education to communities with limited broadband adoption.<sup>7</sup>

### III. Applicant Request

This Resolution considers the two projects submitted in the January 1, 2023, application cycle and listed in Table 1 below that do not qualify for ministerial review.<sup>8</sup>

**Table 1: Projects that do not qualify for ministerial review**

APPLICANT NAME	PROJECT NAME	PROJECT TYPE	REQUESTED FUNDING	REASON
Great Beginnings for Black Babies, Inc.	Healthy Moms and Babies Program	Digital Literacy	\$ 135,625	The applicant does not have at least one year of experience conducting digital literacy training or completed at least one digital literacy training project.
Nü Communications Alliance	Digital Literacy Project	Digital Literacy	\$ 27,030	The nonprofit organization has not existed for more than one year.
			<b>\$ 162,655</b>	

### IV. Project Evaluation Process

D.22-05-029 states that all applications be reviewed, and awarded based on completeness, overall quality, and project costs reasonableness.<sup>9</sup>

*Overall Quality:* All projects were reviewed based on how well they met the requirements and goals set out in D.22-05-029 to increase publicly available or after-school broadband access and digital inclusion in communities with limited broadband adoption.

*Completeness:* D.22-05-029 requires all applicants to submit a complete application package that includes the project description, work plan, performance metrics, detailed budget, cover letter, curriculum (if applicable), as well as a notarized affidavit. Additionally, nonprofit applicants are required to provide tax documents showing their status as a nonprofit organization and documentation showing good standing with the

<sup>7</sup> See D.22-05-029, Slip. Op., Section V (Appendix 2).

<sup>8</sup> 17 applicants requested a total of \$7,686,735 for 37 projects (a list of all submitted projects can be found on the [CASF Adoption Account website](#)).

<sup>9</sup> See D.22-05-029, Slip. Op., at Section VIII (Appendix 2).

United States Internal Revenue Service (IRS), the California Secretary of State, or the California Department of Justice. Staff reviewed each project's application to ensure that all the required information was submitted. If the application was incomplete, Staff provided applicants the opportunity to submit further information to complete the application to meet program requirements.

*Budget:* D.22-05-029 states the Commission may fund up to 85 percent of the total eligible program costs and may reimburse for education and outreach efforts, travel, computing devices,<sup>10</sup> printers, network routers, switches, modems, and cabling deployed for the purpose of establishing a space for broadband access or digital literacy that connects to an existing in-building broadband network such as Wi-Fi (inside network), mobile hotspots (only when no inside network is available), administrative costs (limited to 15% of the overall budget), staffing for instruction and technical support, desks, chairs, and the gathering, preparing, creating and distribution of digital literacy curriculum (see Appendix D).<sup>11</sup> Staff reviewed each project's budget to ensure that no more than 85 percent of eligible program costs were included and asked applicants to adjust their budgets as required, removing any ineligible expenses such as reimbursement for rent, utilities, internet service, lodging, and snacks.<sup>12</sup>

Staff further reviewed project cost reasonableness based on the applicants' proposed budgets, in addition to an evaluation of overall cost per participant. Staff evaluated the mean, median, minimum, and maximum request amount for each of the expense categories and determined a reasonable cost for expenses. Staff also reviewed all expenses to ensure budgeted items were attributable to a required activity.

## **V. Project Review and Recommendations for Funding**

Staff recommends funding for the two projects based on the quality, completeness, and cost reasonableness of the application. See Appendix A, "Approved Project Budget and Performance Metrics", for per-project details regarding the approved budget and expected outcomes.

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<sup>10</sup> Reimbursement for computing devices used in community training rooms or other public space is capped at \$11,250 per project and limited to \$750 per device; Reimbursement for take-home computing devices is capped at \$300 per device, limited to two computing devices per eligible household, and limited to \$40,000 per project; Reimbursement for hotspots is capped at \$300 per device and limited to \$20,000 per project. (See D.22-05-029, Slip. Op. Section VI (Appendix 2).

<sup>11</sup> See D.22-05-029, Slip. Op., Section V (Appendix 2).

<sup>12</sup> Project costs not authorized for funding by the Adoption grant must be funded by other sources (leveraged or self-funding). See D.22-05-029, Slip. Op., Section V (Appendix 2).

Staff reviewed the applications and found that the following projects align with CASF's goal to increase publicly available or after-school broadband access and digital inclusion to serve communities with limited broadband adoption and recommends approval for these projects. Details of each Adoption Account application are discussed below.

Great Beginnings for Black Babies, Inc. (GBBB) - (one project)

The nonprofit GBBB was established in 1990 (as stated by GBBB) and was granted tax-exempt status by the IRS in 1994.<sup>13</sup> The mission of GBBB is to reduce infant mortality in targeted communities by encouraging women to seek early and continuous prenatal care and to adopt healthy lifestyles; to promote the healthy development and growth of babies and children; and, to promote healthy and strengthened outcomes for families. In response to Staff inquiry, GBBB stated that, "the organization became inactive at the beginning of the COVID-19 pandemic but has since been reorganized by its original founder. GBBB has a new board of directors and started operations in 2022." GBBB further noted that the organization does not currently have any paid staff. Nonetheless, GBBB indicated it has four experienced individuals with GBBB's operations (including the founder) who are working to re-establish GBBB programs (two of these individuals will serve as grant administrators/monitors).<sup>14</sup>

The organization does not have at least one year of experience conducting digital literacy training; and they have not completed at least one digital literacy training project. GBBB has a history of instructing mothers (and families, generally) about prenatal care, infant health, and family issues.

GBBB applied for one digital literacy project called Healthy Moms and Babies Program digital literacy project. The project aims to train twenty community members to become digital navigators (community liaisons) under a Train-the-Trainer program. Each digital navigator will, in turn, instruct individuals in eight hours of basic digital literacy as a mandatory component of the Healthy Moms and Babies program. This grant will enable the digital navigators to provide both Train-the-Trainer training and digital literacy training to the community.

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<sup>13</sup> GBBB is listed as a California nonprofit public benefit corporation in good standing on the California Secretary of State website.

<sup>14</sup> GBBB stated to Staff that "GBBB currently has eleven members on its Board of Directors. The Executive Committee consists of three (3) members. They include Dr. Kathye Jenkins as CEO and Board Chair, Zola Jones, MPH, Founder/Director, and Eva Overturf. Both Ms. Jones and Dr. Jenkins will serve as grant administrators/monitors." GBBB stated that four past members of GBBB are working to reestablish the organization after a period of dormancy.

Activities not funded by this grant but connected to this project include identification of women whose babies may be at greater risk for sudden infant death syndrome (SIDS) by the digital navigators. The women identified will be provided with telehealth devices and instructions on how to use the devices. Moreover, digital navigators will conduct virtual home visits with selected families to assess their sleeping environments and provide personalized recommendations for safe sleep practices. This can help identify potential risks and allow providers to intervene before a problem arises.

Therefore, Staff recommends awarding total CASF funding for the GBBB project in the amount of \$135,625 at the cost of \$330 per participant program implementation costs<sup>15</sup> (see Appendix A for information on per project evaluation, funding request and recommended funding).

Nü Communications Alliance (NCA) - (one project)

NCA is a non-profit tribal broadband alliance that is dedicated to building a future of tribal networks as an asset for tribal communities. A Tribal Council resolution established its membership, and currently includes the Lone Pine Paiute Shoshone Tribe, This Bishop Paiute Tribe, The Mono Lake Kootzaduka'a Tribe, and the Bridgeport Indian Colony.

In the application, NCA states that it has been in existence as a non-profit organization since April 11, 2022. The organization received its Employee Identification Number (EIN) in June of 2022 from the IRS. The California Secretary of State website lists NCA as a nonprofit public benefit corporation (in good standing). NCA applied for 501(c)(3) nonprofit status with the IRS (as shown in submitted documents) on February 22, 2023, thus resulting in the consideration of this application in this Resolution.<sup>16</sup>

NCA proposes a digital literacy training program to serve communities in the Payahuunadu region of eastern California (commonly known as Owens Valley). NCA states that it intends to provide an “initial stepping-stone to a well-trained, locally available, and culturally sensitive workforce in our region.” NCA considers this project a pilot and will use lessons learned from the pilot to develop curriculum and training guidelines for other projects in Native American lands throughout the United States (in partnership with the Barbara Bush Foundation). NCA’s focus “is the actual training of

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<sup>15</sup> Adoption Account grants are awarded in two categories – one category for computing devices and hotspots, and a second category for all other expenses (program implementation).

<sup>16</sup> See D.22-05-029, Slip. Op., Section X (Appendix 2).

local individuals, but the knock-on benefit of using us as a case study makes supporting our project more attractive to the outside organizations donating time and resources to us”.

It its application, NCA requests funding for hotspots to be used at participants’ homes (including service costs) given the limited broadband access in the region. Public Utilities Code section 281(j)(5) states, “moneys awarded pursuant to this subdivision shall not be used to subsidize the costs of providing broadband service to households.” Further, D.22-05-029 states that hotspots can be funded as long as no inside-network exists and that internet service costs are not eligible expenses.<sup>17</sup> In its application, NCA states that the hotspots will be available to trainees for the duration of the training only and must be returned when the training is complete. Specifically, no inside-network exists at the training locations and the devices will be provided on a temporary basis and returned once training is complete. As such and given that broadband service costs will not be subsidized, Staff concludes that it is reasonable to fund the hotspot equipment.

Per D.22-05-029, nonprofit applicants must submit an IRS letter approving the applicant’s status as a 501(c)(3) entity. NCA is an eligible applicant per D.22-05-029 as a nonprofit organization with programs to increase publicly available or after school broadband access and digital inclusion,<sup>18</sup> and has submitted an application for 501(c)(3) approval. Thus, Staff recommends that the CASF Adoption Account grant award for the proposed project is conditioned on IRS approval of NCA’s 501(c)(3) application and NCA submitting the 501(c)(3) approval letter to the Communications Division (CD) Director.

The IRS approval should take place no later than October 31, 2023. NCA must notify the CD Director in writing that the IRS approves NCA’s 501(c)(3) status and provide the approval letter.<sup>19</sup> At that time, the CD Director shall, in writing, approve the release of CASF funding and NCA can proceed using the grant. Any costs incurred prior to the CD Director’s notification of the release of funding are not reimbursable. If NCA does not notify the CD Director and provide the IRS 501(c)(3) approval letter by October 31,

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<sup>17</sup> See D.22-05-029, Slip. Op., Section V (Appendix 2).

<sup>18</sup> NCA is presently executing a digital literacy project in partnership with the Barbara Bush Foundation and with assistance for project administration by Intel, Inc.

<sup>19</sup> NCA must submit the IRS 501(c)(3) approval letter to the CD Director at [cd\\_director@cpuc.ca.gov](mailto:cd_director@cpuc.ca.gov) and copy the CASF Adoption Account at [casf\\_adoption@cpuc.ca.gov](mailto:casf_adoption@cpuc.ca.gov). CD Staff will acknowledge the submission by return email.

2023, the conditional CASF Adoption Account funding for NCA's proposed digital literacy project is automatically rescinded.

Therefore, Staff recommends that NCA's CASF Adoption Account grant award of \$27,030 (\$472 per participant program implementation costs) is conditioned on whether the IRS approves NCA's application for 501(c)(3) status and the CD Director receives notice of such approval as described above (see Appendix A for information on per project evaluation, funding request and recommended funding).

## **VI. Compliance Requirements**

GBBB and NCA are required to comply with all the guidelines, requirements, and conditions associated with the grant of CASF funds as specified in D.22-05-029. Such compliance includes but is not limited to the items listed below.

### *A. Execution and Performance*

GBBB and NCA must start the project within six months after submitting a consent form and complete the project within a 24-month time frame. The Commission may withhold, reduce, or terminate grant payments if the grantee does not comply with any of the requirements set forth in its application or the CASF rules. If the grantee fails to complete the project in accordance with the terms of approval granted by the Commission, GBBB and NCA must reimburse some or all the CASF funds it has received.

GBBB and NCA must complete all performance under the award by the termination date of the award.

GBBB and NCA must sign a consent form within 30 days of the date of the award agreeing to the terms stated in the Resolution. A completed and executed consent form should be emailed to [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov) within 30 calendar days from the date of the award. Failure to submit the consent form within 30 calendar days from the date of the award will void the grant.

Material changes in the entries shown in the application, such as discontinuing operation or bankruptcy, or change of name (including DBA), change of address, telephone, fax number or E-mail address should be reported by a letter to the Commission Director of the Communications Division, 505 Van Ness Avenue, San Francisco, CA 94102.



*B. Project Audit and Reporting Requirements*

See Appendix B.

## **VII. Payments to CASF Recipients**

Reimbursement payments will be made in accordance with, and within the time specified in the California Government Code, section 927, et seq. GBBB and NCA must notify the Director of the Communications Division as soon as they become aware that they may not be able to meet project deadlines. The Commission may withhold or reduce payment if GBBB and NCA fails to notify the Director of such changes. See Appendix C for payment details.

## **COMMENTS ON DRAFT RESOLUTION**

In compliance with Public Utilities Code section 311, subdivision (g), a notice letter was emailed on DATE, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution for public comments at the Commission's documents website at <http://www.cpuc.ca.gov/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website.

## **FINDINGS**

1. On or before January 1, 2023, Staff received applications from GBB and NCA for two projects that do not qualify for ministerial review approval.
2. Staff reviewed the applications and recommended awards based on completeness, overall quality, and project cost reasonableness.
3. Based on its review, Staff determined that these two projects qualify for funding under D.22-05-029 and recommends funding the projects as listed in Appendix A.
4. D.22-05-029 requires nonprofit applicants to submit an IRS letter approving the applicant's status as a 501(c)(3) entity. NCA is a nonprofit and applied for IRS 501(c)(3) status on February 22, 2023, approval of which is currently pending.

5. Staff recommends that NCA's CASF Adoption grant award for the proposed project is conditioned on IRS approval of NCA's 501(c)(3) application and submission of the approval letter to the CD Director.
6. Staff recommends that if NCA does not notify the CD Director and provide the IRS 501(c)(3) approval letter by October 31, 2023, the CASF Adoption funding for NCA's proposed digital literacy project is automatically rescinded.
7. A notice letter was emailed on DATE, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution for public comments at the Commission's documents website at <http://www.cpuc.ca.gov/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website.

**THEREFORE, IT IS ORDERED that:**

1. The Commission shall award the following grant amounts:
  - \$135,625 to GBBB for one project;
  - \$27,030 to NCA for one project;

The total grant award is \$162,655. All awards are based on the descriptions of the projects as described herein and are predicated on commitments to provide adoption services as expressed in its application and in compliance with all guidelines, requirements and, conditions associated with a CASF award, as specified in D.22-05-029, and this Resolution.

2. The CASF Adoption Account grant award to NCA is conditioned on IRS approval of NCA's 501(c)(3) application and NCA notifying the CD Director, in writing, of the approval and providing the approval letter to the CD Director by October 31, 2023. If the approval letter is not received by October 31, 2023, NCA's grant will be automatically rescinded.
3. Upon receipt of the IRS approval letter by October 31, 2023, the CD Director shall, in writing, approve the release of CASF funding and NCA can proceed with the grant. Any costs incurred prior to the CD Director's notification of the release of funding are not reimbursable.

4. GBBB and NCA must complete all work and achieve all performance metrics identified in Appendix A of this Resolution and workplans submitted with its application.
5. GBBB and NCA must complete and execute the consent form (to be sent to grant recipients after this Resolution is adopted) agreeing to the conditions set forth in this Resolution.

A completed and executed consent form must be emailed to [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov) within 30 calendar days from the date of the adoption of this Resolution. Failure to submit the consent form within 30 calendar days from the date of the adoption of this Resolution will void the grant.

6. By receiving a CASF grant, GBBB and NCA agree to comply with the terms, conditions and requirements of the grant and thus submits to the jurisdiction of the Commission with regard to disbursement and administration of the grant.
7. GBBB and NCA must maintain files, invoices, and other related documentation for three years after final payment and shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after grant recipients incurred the expense being audited.
8. If GBBB and NCA fail to complete the project in accordance with the terms outlined in D.22-05-029 and this Resolution, they must reimburse some or all the CASF funds it has received.

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on \_\_\_\_\_. The following Commissioners approved it:

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Rachel Peterson  
Executive Director

**APPENDIX A**  
**Approved Project Budget and Performance Metrics\***

#	Applicant Name	Project Name	Project Type	Provide Digital Literacy Training to (Participants)*	In-classroom devices	Take-home Devices	Hotspot Devices	Total Device Award	Amount for Program Implementation	Total Adoption Account Award
1	Great Beginnings for Black Babies, Inc.	GBBB Healthy Mom's and Babies Program	Digital Literacy	360	\$ 11,000	\$ -	\$ 6,000	\$ 17,000	\$ 118,625	\$ 135,625
2	Nu Communications Alliance	Digital Literacy Project	Digital Literacy	40	\$ 2,250	\$ 2,890	\$ 3,000	\$ 8,140	\$ 18,890	\$ 27,030
				400						\$ 162,655

\* Neither applicant committed to acquiring broadband subscriptions.

## **APPENDIX B**

### **Reporting Requirements**

#### **Project Audit**

Great Beginnings for Black Babies, Inc. and Nu Communications Alliance (grant recipients) must maintain files, invoices, and other related documentation for three years after final payment. Grant recipients shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after the grant recipients incurred the expense being audited.

#### **Project Reporting Requirements**

The grant award is contingent upon fulfilling reporting requirements during and after project completion as specified in D.22-05-029, Appendix 2, Section XIII.

A template for all necessary reports is provided in the CASF Adoption Program Administrative Manual, which is posted on the Commission's Adoption Account website and is also available directly from the website. Up to three reports will be required throughout the course of the project:

*i. Ramp-up period report*

A "ramp-up period report" is required after completion of the ramp up activities and when deployment is set to begin (if applicable). This report must be submitted by no later than 3 months after the completion of the ramp up activities. In this report, recipients will report on the completion of the ramp up activities per the work plan, milestones met, as well as request payment for relevant expenses to date. The ramp up period may not exceed 6 months from the time the application is approved.

*ii. Year 1 Progress Report*

The Year 1 progress report is required at the end of the first year of deployment. This report must be submitted by no later than 3 months after the end of the first year of deployment. In this report, recipients will report on the status of Year 1 milestones per the work plan, as well as request payment for relevant expenses to date.

*iii. Year 2 Completion Report*

The Year 2 completion report is required at the end of the 24-month period, or after the work plan milestones/deliverables have been accomplished if earlier than the 24-month period. This report must be submitted by no later than 3 months after completion of the project. In this report, recipients will report on the completion of the overall project,

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milestones met per the work plan, as well as request payment for final and remaining relevant expenses.

All required reports must be submitted via email to: [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov). The grant recipients must certify that each report submitted is true and correct under penalty of perjury.

## APPENDIX C Payments to CASF Recipients

- Great Beginnings for Black Babies, Inc. and Nu Communications Alliance (grant recipients) may submit payment requests at 3 points throughout the project period. Payment requests may accompany the 3 reports noted above (Ramp Up Period, if applicable, Year 1, Year 2).
- Payment requests may also be submitted separately from and in addition to the Calendar Year reporting described above, provided that each payment request includes the information provided on the most recently submitted Calendar Year report and any additional information or costs incurred since the most recent Calendar Year report was submitted.
- Whether tied to Calendar Year reporting or outside of that reporting schedule, no more than three payment requests may be submitted.
- Payment request for the ramp-up period may not exceed 25% of the grant amount.
- No more than 90% of the grant amount will be reimbursed before the completion report and final payment request;
- All payments requests require documentation of project participation (number of participants trained or provided access and the number of participants that subsequently subscribe to a broadband Internet service provider to use a device in their home).
- Grant recipients shall submit final requests for payment no later than 3 months after completion of the project.
- Payment will be based upon receipt and approval of invoices and other supporting documents showing the expenditures incurred for the project are in accordance with their approved application and budget.
- Grant must notify the Director of the Communications Division as soon as they become aware that they may not be able to meet project deadlines. The Commission may withhold or reduce payment if the grantee fails to notify the Director of the Communications Division of such changes.
- Payment will be made in accordance with, and within the time specified in California Government Code § 927 et seq.
- The Commission has the right to conduct any necessary audit, verification, and discovery during project implementation to ensure that CASF funds are spent in accordance with the terms of approval granted by the Commission.
- The Grant recipients' invoices will be subject to audit by the Commission at any time within three years of final payment.



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Grant recipients must certify that each report and payment request submitted is true and correct under penalty of perjury. All required reports and payment requests, including invoices and other supporting documents should be submitted via email to: [CASF\\_Adoption@cpuc.ca.gov](mailto:CASF_Adoption@cpuc.ca.gov).

**APPENDIX D**  
**Allowable Costs per Decision 22-05-029**

The Commission may fund up to 85 percent of the eligible program costs and may reimburse the following:

- a. Education and outreach efforts (including travel, up to 10% of approved grant amount) and materials;
- b. Acceptable computing devices (does not include smartphones) within budgetary limits and inclusive of computer warranty;
  - In-classroom computing devices
  - Take-home computing devices (for Digital Literacy Projects only)
- c. Software (inclusive of licensing for online platforms);
- d. Printers
- e. Network routers, switches, modems, and cabling deployed for the purpose of establishing a space for broadband access or digital literacy that connects to an existing in-building broadband network such as Wi-Fi (inside network);
- f. Mobile hotspots, only when no inside network is available;
- g. Provision of technical support for the computing devices subsidized through this program;
- h. Desks and chairs to furnish a designated space for digital literacy or broadband access;
- i. For Digital Literacy Projects, gathering, preparing, creating, and distributing digital literacy curriculum;
- j. Staff including digital literacy instructors, staff for monitoring the designated space, or staff for administering call centers (if applicable); and
- k. Reimbursement for administrative costs,<sup>20</sup> (other than for excluded items, listed below) is limited to administrative costs representing 15% or less of the overall proposed budget.

Device technical support must be able to respond either by phone or in person within 24 hours. Refurbished devices must have at least a six-month warranty. New devices must have at least a 30-day warranty.

Facility rent, utilities, internet service costs, food costs, lodging, marketing incentives for participation (gift cards, giveaways, etc.), certain classroom supplies and accessories, and other items not listed above are not eligible for reimbursement. All funding

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<sup>20</sup> "Administrative costs" are defined here as "indirect overhead costs attributable to a project per generally accepted accounting principles (GAAP) and the direct cost of complying with Commission administrative and regulatory requirements related to the grant itself," consistent with other CASF program rules.

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requests will be assessed for reasonableness and may be adjusted accordingly at the discretion of the Commission. Any remaining project costs not authorized for funding by the CASF Adoption grant must be funded by other sources (leveraged or self-funding).

End of Appendix D