PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Agenda ID # 23584**

**COMMUNICATIONS DIVISION RESOLUTION T-17885**

**July 24, 2025**

**RESOLUTION**

Resolution T-17885: California Advanced Services Fund Broadband Adoption Account January 2025 application round grant approvals.

PROPOSED OUTCOME:

* This Resolution approves up to $1,180,540 in funding from the California Advanced Services Fund (CASF) Broadband Adoption Account (Adoption Account) for 10 digital literacy projects. Collectively, these projects will provide digital literacy training to 1,831 participants.

SAFETY CONSIDERATIONS:

* These projects promote safe and effective use of digital technologies and of the information derived from such use.

ESTIMATED COST:

* $1,180,540 from the Adoption Account. CASF’s accounts are funded through a surcharge whereby revenues are deposited to CASF Fund 3141 with the State’s Treasury. The surcharge mechanism is a flat rate for each active access line that telephone corporations service in California levied at the surcharge rate of $0.90. The flat surcharge is divided among the six Universal Service Programs of which CASF receives a 28.50% share.[[1]](#footnote-2) Pursuant to Public Utilities (Pub. Util.) Code section 270, subd. (b), money in the funds may only be expended upon appropriation in the Annual Budget Act or upon supplemental appropriation. For fiscal year 2024/2025, the Commission issued Resolution T-17825 which set an appropriation amount of $36.385 million for the Adoption Account. These appropriations were adopted in the California Budget Act for the respective fiscal year.

**Summary**

This Resolution approves $1,180,540 in funding from the California Advanced Services Fund (CASF) Broadband Adoption Account (Adoption Account) for 10 digital literacy projects from Building Skills Partnership (BSP) (one project), Digital Equity West (DEW) (eight projects), and EveryoneOn (one project). Collectively, these projects will provide digital literacy training to 1,831 participants in the counties of Alameda, Los Angeles, Orange, Sacramento, San Diego, and Santa Clara.

Table 1, below, lists the 10 recommended Adoption Account projects.



**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.[[2]](#footnote-3) 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. For fiscal year 2024/2025, the Commission issued Resolution T-17825 which set an appropriation amount of $36.385 million for the Adoption Account. These appropriations were adopted in the California Budget Act for the respective fiscal year.

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.*
* *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.*
* *Projects eligible for grant funding include digital literacy projects and broadband access projects. Digital literacy projects may include digital literacy training programs and public education to communities with limited broadband adoption.[[3]](#footnote-4)*
* *The Commission assigned Commission Division (CD) staff (Staff) the task of approving applications that meet the criteria for ministerial review.*
* *Applications with grant requests that exceed $150,000 are not eligible for ministerial approval.*
* *Applications from nonprofit organizations that have not existed for one year are not eligible for ministerial review.[[4]](#footnote-5)*
* *Applications that do not meet ministerial review criteria may be approved for a grant by the Commission via Resolution.*

**Discussion**

# **Applicant Request**

This Resolution considers the 10 projects submitted in the January 1, 2025, application round that do not meet one or more of the ministerial review criteria (see Table 1, above).

# **Project Evaluation Process**

The Commission in D.22-05-029 states that all applications will be reviewed, and awarded based on completeness, overall quality, and project costs reasonableness.[[5]](#footnote-6)

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

*Completeness*: Consistent with D.22-05-029, all applicants are required 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 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, and if incomplete, Staff requested further information per 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,[[6]](#footnote-7) 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).[[7]](#footnote-8) 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 to remove any ineligible expenses such as reimbursement for rent, utilities, internet service, lodging, and snacks.[[8]](#footnote-9)

Staff further reviewed project budgets, cost reasonableness, and evaluated overall cost per participant. Staff evaluated the mean, median, minimum, and maximum request amount for each expense category and determined a reasonable cost for expenses, and reviewed all expenses to ensure budgeted items were attributable to a required activity.

# **Project Review and Recommendations for Funding**

Staff recommends funding for the 10 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 of the approved budget and expected outcomes.

The 10 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 as discussed below.

Building Skills Partnership - (one digital literacy project)

Building Skills Partnership (BSP) is a 501(c)(3) tax exempt nonprofit organization founded in 2007 and granted tax exempt status in 2008. BSP's mission is to empower property and airport service workers[[9]](#footnote-10) and their families to achieve personal and professional success through skills development, education, and community advancement. BSP works to improve the quality of life for low-wage property service workers and their families by increasing their skills, providing access to education and opportunities for career and community advancement. It partners with employers to train and certify their staff in meeting industry-wide trends. In 2023, BSP programs served 4,650 participants through direct services and training, and 18,500 individuals through hybrid outreach & online services.

BSP has a background in providing digital literacy training. In 2020, during the COVID Public Health Emergency, BSP implemented its digital literacy programming. Since its inception, BSP has trained approximately 2,044 participants through its digital literacy programming. In 2023, BSP piloted the Digital Navigators at Work (DNW) program at Oracle in Northern California with the employer service by Medallion. Its Digital Literacy team worked with Medallion to tailor its curriculum exclusively to its workers, given that Medallion needed its workers to have the knowledge of doing processes digitally, and as seamlessly as possible. At the culmination of the course, 21 workers successfully graduated.

BSP proposes to narrow the digital divide for aging English language learners of multiple skill levels, by expanding its digital literacy program to include Artificial Intelligence (AI) training, alongside vocational English as a second language (ESL)(which embeds digital literacy training into language learning),[[10]](#footnote-11) and other blended-model workforce development programming. Training will be provided primarily in-person in group settings, with an option to join virtually.

The goal of the BSP project is to provide 500 individuals with a minimum of eight hours of digital literacy instruction. BSP aspires to subscribe 100 participants to new broadband internet services.

Therefore, Staff recommends awarding BSP total CASF funding in the amount of $211,895 for this project, at the cost of $401.79 per participant trained for program implementation costs (see Appendix A for information on the approved budget and performance metrics).

Digital Equity West – (eight digital literacy projects)

Digital Equity West (DEW) is a newly founded 501(c)(3) tax exempt nonprofit organization recently founded that received its IRS determination letter granting its tax exempt status on 8/26/2024.[[11]](#footnote-12) The organization was founded to be in alignment with the stated goals of the Adoption Account with the Articles of Incorporation committing the organization to bridging the digital divide by providing services such as digital literacy training, affordable broadband access, and low-cost equipment distribution in low-income, broadband-limited areas. Founding member and board president Maurizio Cruz has 28 years of expertise in broadband access and fiber deployment, having contributed to major initiatives such as the Rural Digital Opportunity Fund (RDOF) and having led projects with providers like AT&T, Verizon, and Frontier. He has experience in digital literacy instruction with the International Partnership of Education Research and Communication or IPERC. Co-founder and Operations Director Rose Castellanos has over 22 years of operational experience in running nonprofits and managing budgets, as well as implementing programs (with a strong focus on youth development and community health).

DEW proposes to provide both in-person and virtual, training sessions focusing on essential and fundamental digital skills required to operate a computer and access/navigate the internet successfully. In-person training locations are situated to target low-income communities who face significant barriers to digital literacy and broadband adoption in the following cities in Los Angeles County: Pacoima, San Fernando, Van Nuys, Sun Valley, Tujunga, and North Hollywood for a total of 8 locations (with training at each location funded as a separate project). Training will be provided in community spaces using a mobile computer training lab which will connect to available Internet capacity through hotspots.

Therefore, Staff recommends awarding DEW CASF funding in the amount of $793,081 for all eight projects, averaging $455.03 per participant trained program implementation costs (see Appendix A for information on the approved budgets and performance metrics including the per participant cost for each separate project).

EveryoneON - (one digital literacy project)

EveryoneON is a 501(c)(3) tax exempt nonprofit organization[[12]](#footnote-13) founded in 2012 and granted tax exempt status in 2014. EveryoneON’s mission is to create social and economic opportunity by connecting low-income families to affordable internet service and computers, and by delivering digital skills trainings, thereby creating greater opportunities for everyone, regardless of age, race, geography, income, or education level. EveryoneON operates nationally and, per EveryoneON, has trained over 4,000 low-income adults, senior citizens, immigrant and refugee populations. EveryoneON has received funding for 17 grants from the Adoption Account, having completed five of these grants. EveryoneON slightly overperformed on the completed projects, training more participants than projected. EveryoneON is on schedule to complete their remaining projects.

EveryoneOn is proposing a digital literacy project to serve underserved communities in central, east, and south Los Angeles; specifically, the neighborhoods of Westlake/Pico Union, Boyle Heights, and South Los Angeles. These areas have been identified by Los Angeles County’s Internal Services Department as priorities for digital equity due to high poverty, unemployment rates, and low broadband adoption.

The project will target low-income adults facing socio-economic barriers to broadband access. Through partnerships with trusted community-based organizations such as Central City Neighborhood Partners, LiFT LA, and the University of California Los Angeles Community Youth Programs, EveryoneOn will provide comprehensive support including outreach, digital literacy training, assistance with new residential broadband subscriptions, and distribution of computing devices.

The digital literacy training will be conducted at locations equipped with high-speed internet and selected in collaboration with partners to ensure convenience and community trust. EveryoneOn’s Digital Connections curriculum focuses on building comfort with technology, communication tools, privacy settings, and how to access online education and employment resources. The curriculum will leverage free and open-source platforms such as GCFLearnFree.org, Google for Education, and NorthStar Digital Literacy, and is currently available in English and Spanish.

The goal of the EveryoneOn project is to provide 300 individuals with a minimum of eight hours of digital literacy instruction. EveryoneOn aspires to subscribe 30 participants to new broadband internet services.

Therefore, Staff recommends awarding EveryoneOn total CASF funding in the amount of $175,564 for this project, averaging $452 per participant trained program implementation costs (see Appendix A for information on the approved budget and performance metrics).

# **Compliance Requirement**

BSP, DEW, and EveryoneON 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.

*Execution and Performance*

BSP, DEW, and EveryoneON 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, BSP, DEW, and EveryoneON must reimburse some or all the CASF funds it has received.

BSP, DEW, and EveryoneON must complete all performance under the award by the termination date of the award.

Grantees may make modifications to line items within an approved project budget without prior authorization, so long as those modifications do not cause the project budget to exceed the overall adopted project budget and so long as the proposed budget modifications are unrelated to the budgets for classroom or take-home devices, including hotspots. Grantees may change milestone/activity timelines without prior authorization, so long as those modifications do not cause the project timeframe to exceed the overall adopted project timeframe. While prior approval is not required for these modifications, the applicant must notify the Communications Division by e-mailing CASF\_Adoption@cpuc.ca.gov within 30 days of making such changes.

BSP, DEW, and EveryoneON 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.govCASF\_Adoption@cpuc.ca.gov within 30 calendar days from the date of the award. The Commission will deem the grant null and void for failure to submit the consent form within 30 calendar days from the date of the award.

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 and CDCompliance@cpuc.ca.gov.

*Project Audit and Reporting Requirements*

See Appendix B.

# **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. BSP, DEW, and EveryoneON 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 BSP, DEW, and EveryoneON fails to notify the Director of such changes. See Appendix C for payment details. BSP, DEW, and EveryoneON must submit final requests for payments no later than three months after completion of the project.

**Comments**

Public Utilities Code section 311(g)(1) provides that this Resolution must be served on all parties and subject to at least 30 days public review.  Any comments are due within 20 days of the date of its mailing and publication on the Commission’s website and in accordance with any instructions accompanying the notice. Section 311(g)(2) provides that this 30-day review period and 20-day comment period may be reduced or waived upon the stipulation of all parties in the proceeding.

The 30-day review and 20-day comment period for the draft of this resolution was neither waived nor reduced. Accordingly, this draft resolution was mailed to parties for comments on June 19, 2025.

**Findings AND CONCLUSIONS**

1. On or before January 1, 2025, staff received three applications for the 10 projects considered here in this Resolution.
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 10 projects qualify for funding under D.22-05-029 and recommends funding as listed in Appendix A.
4. A notice letter was emailed on June 19, 2025,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:
* In the amount of $211,895 to BSP for its Digital Literacy and AI Program Expansion project;
* In the amount of $793,081 to DEW for its Proj\_No\_Hollywood1\_91606, Proj\_No\_Hollywood2\_91601, Proj\_Pacoima\_91331, Proj\_San Fernando\_91340, Proj\_Sun Valley\_91352, Proj\_Tujunga\_91042, Proj\_Van Nuys1\_91405, Proj\_Van Nuys2\_91406 projects;
* In the amount of $175,564 to EveryoneON for its Digital Connections - Central, East, and South Los Angeles project;

The total grant award is in the amount of $1,180,540. 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 each 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.

* 1. BSP, DEW, and EveryoneON must complete all work and achieve all performance metrics identified in Appendix A of this Resolution and workplans submitted with its application.
	2. BSP, DEW, and EveryoneON 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 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.

* 1. By receiving a CASF grant, BSP, DEW, and EveryoneON agree to comply with the terms, conditions and requirements of the grant and thus submit to the jurisdiction of the Commission with regard to disbursement and administration of the grant.
	2. BSP, DEW, and EveryoneON 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.
	3. If BSP, DEW, EveryoneON, or RPC 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 they have received.

This Resolution is effective today.

This Resolution is effective today.

Commissioner Signature blocks to be added upon adoption of the resolution

The foregoing resolution was duly introduced, passed and adopted at a conference of the Public Utilities Commission of the State of California held on July 24, 2025; the following Commissioners voting favorably thereon:

Dated July 24, 2025, at San Francisco, California

**APPENDIX** **A**

**Approved Project Budget and Performance Metrics**



**APPENDIX B**

**Reporting Requirements**

**Project Audit**

BSP, DEW, and EveryoneON (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:

1. *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.

1. *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.

1. *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, 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. The grant recipients must certify that each report submitted is true and correct under penalty of perjury.

**APPENDIX C**

**Payments to CASF Recipients**

* BSP, DEW, and EveryoneON (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.

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.

**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:

1. Education and outreach efforts (including travel, up to 10% of approved grant amount) and materials;
2. 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)
1. Software (inclusive of licensing for online platforms);
2. Printers
3. 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);
4. Mobile hotspots, only when no inside network is available;
5. Provision of technical support for the computing devices subsidized through this program;
6. Desks and chairs to furnish a designated space for digital literacy or broadband access;
7. For Digital Literacy Projects, gathering, preparing, creating, and distributing digital literacy curriculum;
8. Staff including digital literacy instructors, staff for monitoring the designated space, or staff for administering call centers (if applicable); and
9. Reimbursement for administrative costs,[[13]](#footnote-14) (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 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).

1. Resolution T-17818, adopted on April 4, 2025, established a new surcharge rate of $0.90 per access line for California’s six Universal Service Public Purpose Programs (PPPs), effective May 1, 2025. The surcharge rate was previously set at $1.11 per access line. [↑](#footnote-ref-2)
2. Public Utilities Code section 281, subdivision (d)(3). [↑](#footnote-ref-3)
3. See D.22-05-029, Slip. Op., at Section V (Appendix 2). [↑](#footnote-ref-4)
4. See D.22-05-029, Slip. Op., at Section X (Appendix 2). [↑](#footnote-ref-5)
5. See D.22-05-029, Slip. Op., at Section VIII (Appendix 2). [↑](#footnote-ref-6)
6. See D.22-05-029, Slip. Op. Section VI (Appendix 2)). [↑](#footnote-ref-7)
7. See D.22-05-029, Slip. Op., Section V (Appendix 2). [↑](#footnote-ref-8)
8. 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). [↑](#footnote-ref-9)
9. Property service workers are janitors, security officers, maintenance and custodial workers, stadium, arena, and airport workers, and other workers who provide important services to the buildings of California. [↑](#footnote-ref-10)
10. BSP serves a primarily Spanish-speaking population. [↑](#footnote-ref-11)
11. The effective date of exemption is April 18, 2024. [↑](#footnote-ref-12)
12. EveryoneON is the DBA (doing business as) name for Connect to Compete Inc. [↑](#footnote-ref-13)
13. “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. [↑](#footnote-ref-14)