September 30, 2020
Texas House Committee on Public Education
Re: Request for Information, Interim Charge 2, Questions 1 and 2

Dear Chairman Huberty, Vice Chairman Bernal, and members of the House Public Education Committee,
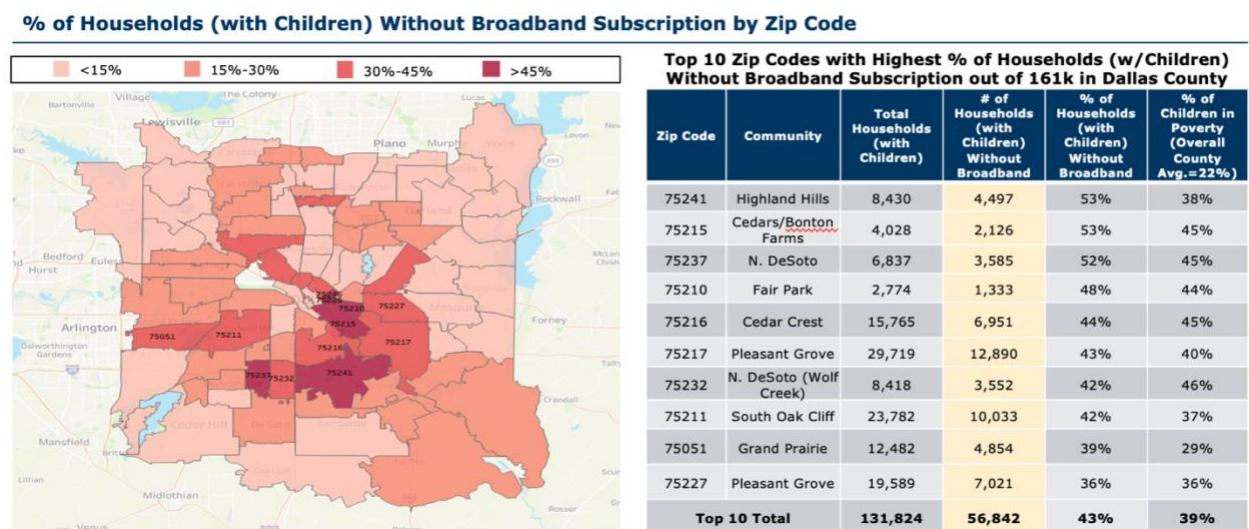
Thank you for the opportunity to submit a response to Interim Charge 2 of the House Public Education Committee, related to barriers in providing a digital learning environment and gaps in internet service coverage for all Texas students.

This letter is submitted on behalf of the Dallas Regional Chamber, the Commit Partnership, and the represented members of our Internet for All coalition. Together, we hold a vested interest in the success of students in Dallas County and are committed to advocating in support of policies that advance academic outcomes in our region and across the state.

Since the widespread closure of schools and subsequent transition to virtual learning in mid-March due to the COVID-19 pandemic, too many Dallas County students have been unable to receive a quality education as a result of their household's lack of internet connectivity. While the present crisis has elevated this issue for schools, communities, and individual families, the digital divide was a persistent challenge even prior to the shift to fully remote instruction, and we commend the House Public Education Committee for regularly prioritizing this important issue prior to COVID-19.

2018 Census estimates suggest that roughly 25% of households with children in Dallas County, comprising 75,000 students, lack broadband subscriptions, including approximately 30% of Dallas ISD's 155,000 students. In the county's least connected zip codes, largely in Southern Dallas, more than half of households with children do not have a broadband subscription.

Exhibit A:

% of Households (with Children) Without Broadband Subscription by Zip Code

| <15% | 15%-30% | 30%-45% | >45% |

Top 10 Zip Codes with Highest % of Households (w/Children) Without Broadband Subscription out of 161k in Dallas County

| Zip Code	Community	Total Households (with Children)	# of Households (with Children) Without Broadband	% of Households (with Children) Without Broadband	% of Children in Poverty (Overall County Avg.=22%)
75241	Highland Hills	8,430	4,497	53%	38%
75215	Cedars/Bonton Farms	4,028	2,126	53%	45%
75237	N. DeSoto	6,837	3,585	52%	45%
75210	Fair Park	2,774	1,333	48%	44%
75216	Cedar Crest	15,765	6,951	44%	45%
75217	Pleasant Grove	29,719	12,890	43%	40%
75232	N. DeSoto (Wolf Creek)	8,418	3,552	42%	46%
75211	South Oak Cliff	23,782	10,033	42%	37%
75051	Grand Prairie	12,482	4,854	39%	29%
75227	Pleasant Grove	19,589	7,021	36%	36%
Top 10 Total		**131,824**	**56,842**	**43%**	**39%**

Source: U.S. Census American Community Surveys 5-Year Estimates, 2018; Areas 75246 & 75226 have 60% and 59% of households (with children) without broadband respectively but have less than 1,000 households.

While the absence of broadband infrastructure prohibits some households in Texas from accessing the internet, it is believed that high costs and a lack of sufficient credit are the most likely barriers to blame in Dallas County. Connected Nation Texas estimates that 99.68% of Dallas County households are covered by already available and sufficient broadband subscriptions with a minimum speed of 100 Mbps download and 10 Mbps upload. But

rates of broadband subscription decline in Dallas County as a zip code's poverty level increases, according to analysis done by the Commit Partnership.

Exhibit B:

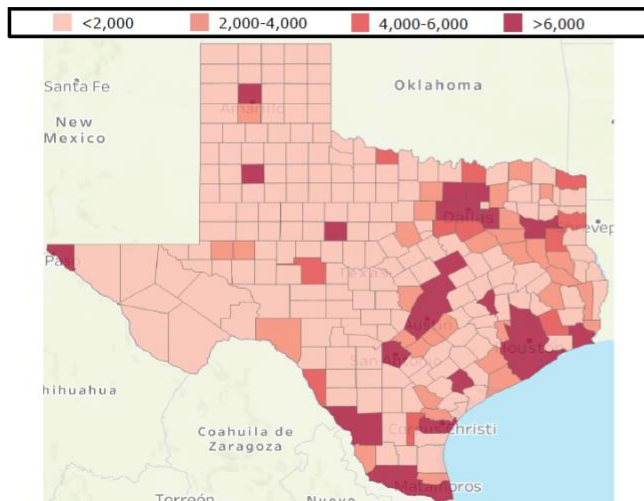## % of Households (with Children) without Broadband by Zip Code, 2018
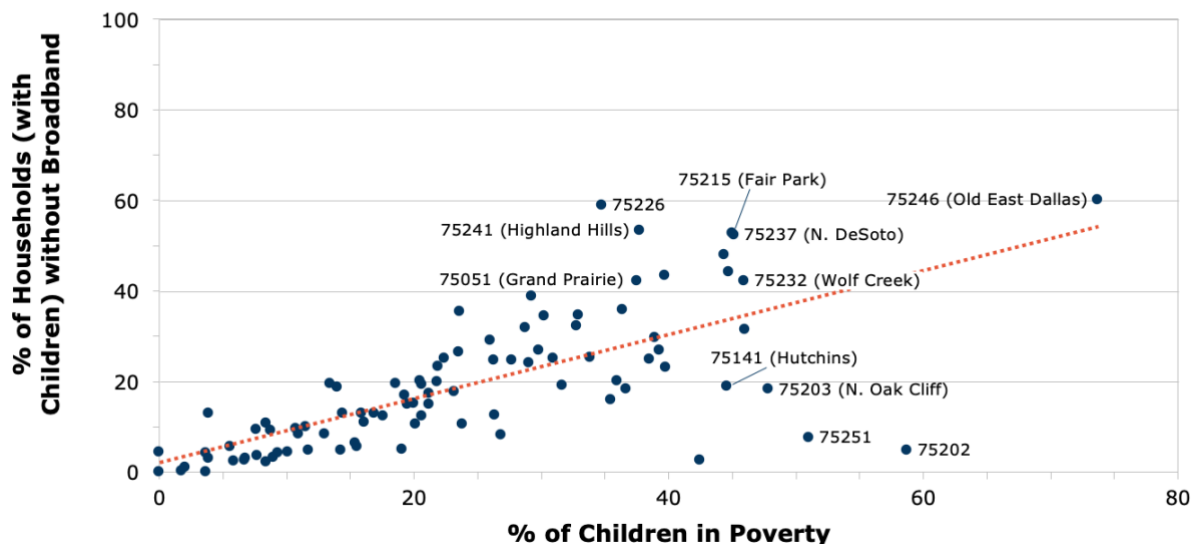
Source: U.S. Census American Community Surveys 5-Year Estimates, 2018.

To be clear, the digital divide is persistent across the state and impacts many of Texas' 5.4 million public school students. Some counties are more acutely impacted than others. For example, 2018 census estimates suggest between 33% and 46% of households with children across three counties (Hildalgo, Cameron, and Webb) in the Rio Grande Valley do not have a broadband subscription. In Harris County alone, approximately 215,000 households with children lack internet connectivity. As is the case in Dallas, rates of broadband subscriptions are closely correlated with poverty rates.

Exhibit C:

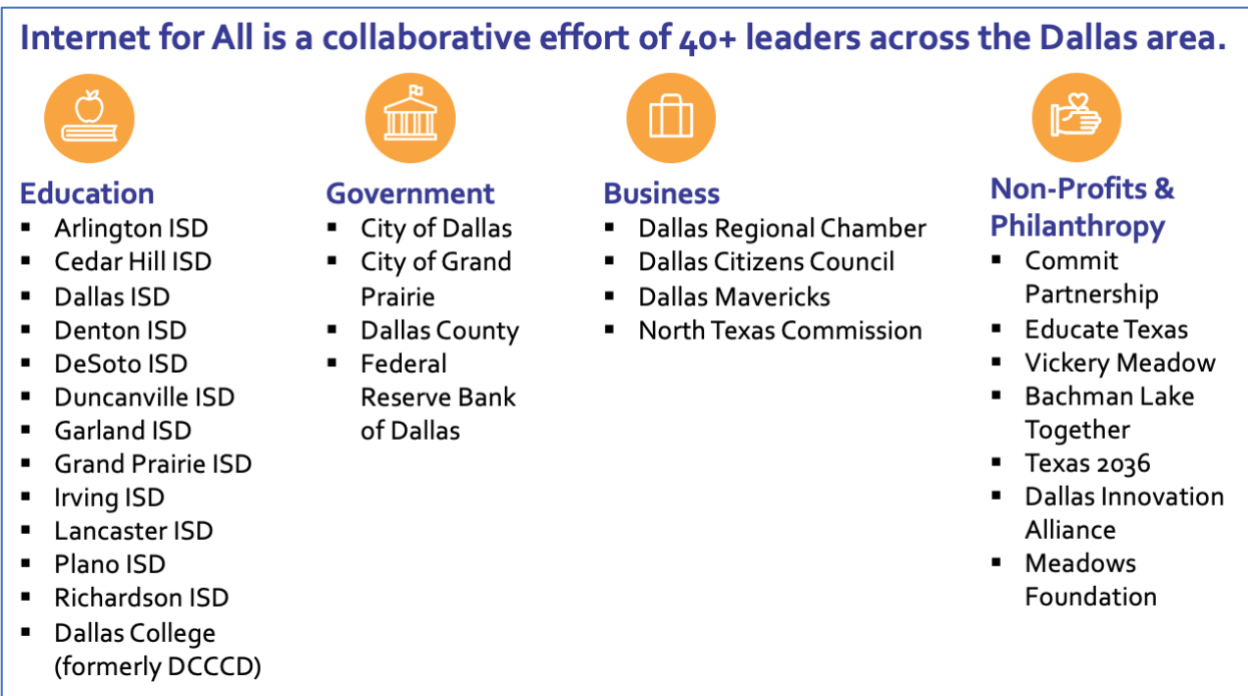## # of Households (with Children) Without Broadband Subscription by County

Top 10 Counties (4%) w/ Highest # of Households (w/Children) Without Broadband Subscription out of 1.3M in Texas

County	Total Households (with Children)	# of Households (with Children) Without Broadband	% of Households (with Children) Without Broadband	% of Children in Poverty
Harris (Houston)	1,239,392	215,123	17%	24%
Dallas	686,778	150,218	22%	25%
Hidalgo (RGV)	282,289	92,634	33%	43%
Bexar (S. Antonio)	498,079	82,322	17%	23%
Tarrant (Ft. Worth)	539,732	72,780	13%	19%
Cameron (RGV)	130,289	59,613	46%	44%
El Paso	232,173	40,318	17%	30%
Travis (Austin)	268,783	36,550	14%	18%
Webb (RGV)	91,252	33,658	37%	41%
Collin (N. Texas)	250,933	17,780	7%	8%
Texas	**7,278,470**	**1,269,311**	**17%**	**22%**

Source: U.S. Census American Community Surveys 5-Year Estimates, 2018.

Closing the digital divide is crucial to supporting equitable access to a quality education for all Texas students, both through and beyond the COVID-19 crisis.

Question 1 of the interim charge seeks potential solutions to closing internet connectivity gaps across the state. The state may be able to learn from local efforts that have emerged since the onset of COVID-19. In Dallas County, a group of 40 business, community, and education leaders organized the "Internet for All" coalition in May. Collectively, the coalition's members believe that closing the digital divide requires robust cross-sector partnerships inclusive of municipal agencies, nonprofit and philanthropic organizations, and private corporations, to address the region's unique student connectivity needs.

Exhibit D:

Internet for All is a collaborative effort of 40+ leaders across the Dallas area.

Education
- Arlington ISD
- Cedar Hill ISD
- Dallas ISD
- Denton ISD
- DeSoto ISD
- Duncanville ISD
- Garland ISD
- Grand Prairie ISD
- Irving ISD
- Lancaster ISD
- Plano ISD
- Richardson ISD
- Dallas College (formerly DCCCD)

Government
- City of Dallas
- City of Grand Prairie
- Dallas County
- Federal Reserve Bank of Dallas

Business
- Dallas Regional Chamber
- Dallas Citizens Council
- Dallas Mavericks
- North Texas Commission

Non-Profits & Philanthropy
- Commit Partnership
- Educate Texas
- Vickery Meadow
- Bachman Lake Together
- Texas 2036
- Dallas Innovation Alliance
- Meadows Foundation

The coalition aligned on short-term, medium-term, and long-term solutions to bridge Dallas County's connectivity gap. In the short-term, school districts in the Internet for All Coalition focused on equipping all students with mobile hotspots to support immediate internet access and participation in virtual learning. This work is ongoing, with the goal of ensuring all students, from kindergarten through college, have access to the internet by January of 2021.

Efforts will continue beyond that date, however, to permanently close the digital divide. In the medium-term, the coalition will work on providing reliable and affordable broadband subscriptions for students and their families through increased usage of low-cost plans, expansion of public wi-fi on city and municipal properties, and other strategies. Long-term solutions emphasize community-wide initiatives, such as private network pilots and county-wide engineering plans in coordination with Internet Service Providers (ISPs). **It is our recommendation that regions take a multi-prong approach, similar to Dallas County, in order to find the right solutions for all neighborhoods and households.**

There are a number of specific strategies that can be applied across most, if not all, counties in Texas:
- Understanding access to broadband by zip code via the Dallas County and statewide connectivity analysis and dashboard
- The establishment of minimum standards (100 Mbps download and 10 Mbps upload speeds were explicit goals for Dallas County) for connectivity to ensure virtual learning is uninterrupted.

- Pilot private wireless networks, expanding the reach of school internet signals into the homes of students by aggregating households and sharing vertical assets. In September of 2014, the Texas Municipal League clarified state law in a filing to the FCC, stating that although cities are prohibited from providing directly or indirectly a "telecommunications service" to the the public, they are not prohibited from providing internet connectivity because it is federally classified as an "information service." This continues to be the law today. As such, this approach can be a win-win solution for communities and ISPs. Selected pilot sites should use criteria that recognize the compounding effects of poverty and inequities, like limited access to health clinics, libraries and unemployment rates. Research from the Federal Reserve Bank of Dallas further illustrates the merits of this approach.
- Explore ways for district and state funding to cover the costs of in-home internet subscriptions to improve speed and reliability of internet until the pandemic is over or a permanent solution is implemented. For an example, see the Internet for All Coalition's RFP for in-home subscriptions.
- Educate families on low-cost internet options and help them access these services. See resources provided on the Internet for Dallas website.

While this coalition model and strategies created from the collaboration may be replicated in other regions of the state to address local community needs, **there are valuable steps state leaders and lawmakers can take to better ensure internet connectivity for students and their families across Texas.**

1. **The state should call upon the Federal Communications Commission (FCC) to revise several existing rules related to the E-Rate program.** The E-Rate program provides funding to schools and libraries and connects schools and libraries with affordable broadband services. Current rules, however, largely restrict the usage of funds and services to campus boundaries.

   In May, Texas Commissioner of Education Mike Morath and Dallas ISD Superintendent Michael Hinojosa, alongside 64 other Texas school system leaders and 5 educational associations, wrote the FCC, recommending the following changes to existing E-Rate rules:
   1. Permanently allow schools and libraries to extend their networks, wireless or wireline, beyond campus boundaries.
   2. Permanently allow the use of school networks for families, not just students, at or below the poverty line so that parents can support learning for their students and themselves.
   3. Allow E-Rate dollars to be used to deliver internet access to the residence of students in underserved neighborhoods.
   4. Allow E-Rate funds to be used for cellular data plan subscriptions or comparable wireline technology subscriptions for students.
   5. Allow public higher education institutions to access E-Rate funding, or establish a parallel stream of federal funding designated for higher education institutions.

   If authorized, these policy changes would support cost-effective solutions to the digital divide in Texas, enabling school districts to partner with other public and private entities to deliver internet services to students and families at-home by leveraging existing broadband infrastructure. For example, these changes would allow school districts to use E-Rate dollars to pay for in-home broadband subscriptions for students, whereas presently school districts seeking to do so must identify alternative sources of funding. We encourage state lawmakers to join the aforementioned education leaders across Texas in advocating for these recommendations to the FCC.

2. **Explore all federal programs and funding to develop solutions for unserved and underserved areas of Texas, and think creatively about opportunities to leverage state funding to augment solutions.** Federal broadband programs, such as Connect America Fund, Rural Digital Opportunity Fund and ReConnect, may provide the opportunity to increase broadband access in areas that have not yet been addressed.

   Additionally, the state should work with Congress to revamp the federal Lifeline program to make broadband more affordable for low-income Texans. Increasing the current federal Lifeline subsidy and modernizing the

program via digital payments would make it easier for Texans to access existing solutions and for ISPs to serve them.

3. **Create a separate Technology and Instructional Materials Allotment (TIMA) for addressing student connectivity or incorporate school district connectivity rates as an additional variable in determining TIMA allocation amounts**. As noted in the interim charge, the Technology and Instructional Materials Allotment (TIMA) is another useful resource at school districts' disposal. Per guidance from the Texas Education Agency (TEA), the funding a district receives through TIMA may be used to purchase technological equipment that contributes to student learning, including laptops, tablets, and hotspots to facilitate remote instruction. TEA committed an additional $200 million to Operation Connectivity, made available through the federal CARES Act, to support school districts in obtaining devices, including hotspots and routers, for students to enable home-based internet access for the 2020-2021 school year.

   The amount of funding a school district receives through TIMA is determined by the Commissioner, and is largely based on the district's general student enrollment, bilingual student enrollment, and status as a fast-growth school district. However, a district's TIMA funding is also used to purchase a host of instructional resources, such as textbooks, workbooks, supplementary instructional materials, and computer courseware. As a result, school districts may be forced to choose between necessary instructional materials or internet connectivity supports for students.

   A new allotment, or an update to the existing allotment, should be funded adequately, based on school district connectivity rates, to meet the connectivity needs of Texas' students.

4. **Coordinate with ISPs to provide uniform affordable, reliable and accessible connectivity solutions on behalf of school districts and charters who serve rural and/or low-income students.** State lawmakers should consider incentives to encourage ISPs to collaborate with state education leaders and individual school districts to identify and explore innovative and cost-effective methods to close the digital divide. Maximizing the utilization of the existing infrastructure – land-based, fixed wireless, or mobile – serves the interests of taxpayers, ISPs, and students, and is worthy of exploration by all, but incentives may be the necessary catalyst to build needed partnerships.

   We again commend the House Public Education Committee for prioritizing this critical issue. The Dallas Regional Chamber, the Commit Partnership, and the co-signed organizations support state-led efforts to close Texas' digital divide. In doing so, we can assist our most vulnerable students through the present crisis and further our commitment to equity in education.

   Respectfully,

Drexell Owusu   Dottie Smith
Senior Vice President, Education & Workforce   President
Dallas Regional Chamber   The Commit Partnership

CO-SIGNED ORGANIZATIONS: Arlington ISD, Bachman Lake Together, Cedar Hill ISD, City of Dallas, City of Grand Prairie, Dallas Citizens Council, Dallas College, Dallas County, Dallas Innovation Alliance, Dallas ISD, Dallas Mavericks, Denton ISD, DeSoto ISD, Duncanville ISD, Federal Reserve Bank of Dallas, Garland ISD, Grand Prairie ISD, Irving ISD, Lancaster ISD, Meadows Foundation, North Texas Commission, Parkland Foundation, Parkland Health & Hospital System, Plano ISD, Region 10 Education Service Center, Richardson ISD, United Way of Metropolitan Dallas, Vickery Meadow