

Providing Connectivity Devices to PC/PB or Committee Members: Sound Practices and Suggestions

INTRODUCTION

When Ryan White HIV/AIDS Program (RWHAP) Part A Planning Councils and Planning Bodies (PC/PBs) suddenly found themselves unable to meet in person due to the COVID-19 public health emergency, the ability of all members and committee members to access the internet became an important concern. Prior to the declaration of a state of emergency by all states, most PC/PBs met in person. Some PC/PBs allowed members to access meetings remotely in certain situations, but many did not, usually due to open meeting laws that require members to be physically present to vote. Under emergency orders, states have allowed public bodies, including PC/PBs, to meet remotely.

Individual member access to the internet has been affected by the pandemic. Unaligned consumer members¹ who normally access the internet at work or at a public library, café, or other location lost that option when offices, public buildings, and restaurants closed due to COVID-19. When PC/PBs first began meeting remotely, staff found that some members, most often consumers, either lacked internet access or had smartphones with minutes or data plans insufficient to cover PC/PB or committee meetings lasting 1-2 hours or more.² In addition, some PC/PBs have found smartphones problematic because the screens are too small to read expenditure spreadsheets, dashboards, or materials in PDF format. Some people may have computers or tablets with no internet connection, or current bandwidth (speed) may be insufficient for video conferencing.³

To maintain participation by all members, PC/PBs and their planning council support (PCS) staff have needed to arrange connectivity for members – connectivity that is sufficiently fast and includes high enough data limits to allow for participation in meetings and other planning activities. To this end, many PC/PBs and Part A recipients explored possible solutions and shared their experiences. This document summarizes sound practices and provides suggestions for ensuring connectivity for all PC/PB members and committee members, while controlling costs and maintaining appropriate documentation. The Appendix provides a sample policy and procedures that can serve as a model for PC/PBs as they establish their own policies in this area.

TYPES OF DEVICES AND AIDS

PC/PBs can provide, or help to pay for, a variety of connectivity devices and aids. This may include a mobile communications device, such as a smartphone, tablet, or laptop, and/or a mechanism for ongoing access to telephone service and the internet, such as a data plan or hotspot.⁴ The types of devices and aids that can be supported include the following: Help everyone get connected. Allow some time to assist PC/PB members or public guests who are having trouble connecting to your meeting.

Mobile Devices and Aids

PC/PBs can provide, or help to pay for, a variety of connectivity devices and aids. This may include a mobile communications device, such as a smartphone, tablet, or laptop, and/or a mechanism for ongoing access to telephone service and the internet, such as a data plan or hotspot. The types of devices and aids that can be supported include the following:

- **Smartphones:** Cell phones that perform many of the functions of a computer, especially internet and data download capability. For a PC/PB member, they can be used to connect to most video conferencing platforms, as well as for audio-only teleconferencing. Most allow for downloading of materials, although it can be challenging to read materials in PDF format or large files. Low-income clients may be eligible for free phones through the federal Lifeline program, though some of the phones provided have limited data capability.⁵
- **Tablets:** Tablets can be an affordable and practical means of internet connectivity for PC/PB members without computers. Compared to smartphones, they offer the benefit of larger screens, which are helpful for reading downloaded materials and for video conferencing. Costs range from less than \$100 to more than \$400. One consideration in choice of tablets is ease of use, especially for members with limited computer experience.
- **Laptops:** Portable computers may be considered an expensive option, but low-end laptops with built-in WiFi, video camera, and microphone are available for a little over \$300, comparable to some tablets. Some PC/PBs have policies (unrelated to COVID-19) for lending a laptop to a Co-Chair or Committee Chair to help them carry out their responsibilities as PC/PB leaders. Laptops have the advantage of a keyboard, useful for members who may need to prepare documents beyond emails.

Mechanisms for Internet Access

- **Data plans:** A data plan is an agreement with a mobile carrier that specifies how much mobile data a user can access, usually per month, for a stated fee. Some plans provide unlimited data, while others have a cap. Data plans from major carriers can be expensive, but lower-cost carriers are available, and major carriers typically have low-cost plans. A service provider or PC/PB can pay for a plan on behalf of a consumer, and may be able to arrange a discounted rate through the federally supported Lifeline program,⁶ which has been providing access to broadband for low-income people since 2016. Lifeline has increased flexibility in determining eligibility to ensure access to the program during the COVID-19 emergency.
- **Data cards:** A data card is a removable electronic card, usually about the size of a credit card. Some prepaid data cards provide a specified number of minutes of dial-up internet or calling time; others provide a specified amount of broadband internet data for a computer, tablet, or smartphone. The card can be either “recharged” or replaced when the time has been used up. Dial-up plans provide a

Video conferencing can use a lot of data.

Since an unlimited single-line data plan for a tablet can cost \$60-\$80 a month, jurisdictions may provide plans with limited data, and help members use available data efficiently. Among the tips for members:

- *Turn off your video when not speaking.*
- *Mute your audio when not speaking.*
- *Screen share only as long as necessary.*

slow connection, typically 56 KB per second, which provides audio access but does not support video conferencing. Prepaid broadband cards allow for video conferencing. Prepaid cards generally require a modem or hotspot. Prepaid cards can be more expensive than monthly data plans, but do not require a contract.

- **Hotspots:** A WiFi hotspot is an internet access point that enables the user to connect to a network using a computer, smartphone, tablet, or other device. Many smartphones can be used as hotspots, but mobile hotspots can also be purchased separately. Prepaid hotspots allow for use of a limited amount of data, and do not require a long-term data plan. PC/PBs can provide hotspots for use with phones or tablets, with the amount of data based on what is needed for accessing or downloading materials, participating in PC/PB meetings, and other planning activities.

PROVIDING CONNECTIVITY: WHAT PC/PBS CAN DO

RWHAP Part A PC/PBs can take a variety of steps to enable their members and committee members to connect to the internet in order to participate in PC/PB-related activities:

- 1. Purchase devices and data access for members when necessary.** PC/PBs can purchase tablets, smartphones, data cards or plans, hotspots, and other mobile devices and data access aids to enable PC/PB or committee members to participate remotely in PC/PB-related activities. These devices and aids should be purchased for members who would not otherwise be able to participate fully in committee or PC/PB meetings or other planning activities.
- 2. Use administrative funds.** Devices and data access aids used by members for participation in planning should be purchased with RWHAP Part A administrative funds budgeted for PC/PB Support (PCS). PC/PBs may modify their budgets to make existing PCS funds available for this purpose. As a result of the pandemic, most PC/PBs have been meeting remotely since March 2020, many missed a month or more of meetings, and some canceled other planned activities. Unexpended funds previously budgeted for purposes such as costs associated with in-person meetings may be rebudgeted for purchasing mobile devices and connectivity aids.
- 3. Take advantage of cost-sharing opportunities.** PC/PBs should look to other RWHAP Parts or to non-RWHAP funding sources to share costs where feasible, in the spirit of RWHAP as the payer of last resort. For example:
 - Consumer members are by definition receiving RWHAP Part A services, and some subrecipients may be providing smartphones, tablets, or other devices to their clients to ensure access to telehealth services. Subrecipients are permitted to use funds provided through funding from the Coronavirus Aid, Relief, and Economic Security (CARES) Act,⁷ RWHAP, or other funds for this purpose. In this case, the PC/PBs may use administrative funds to supplement the cost of mobile technology paid by RWHAP service providers.
 - Non-RWHAP health and human service providers sometimes help obtain cell phones, including smartphones, for clients who would not otherwise be reachable by telephone or computer.
 - The Lifeline Program, previously described, provides many low-income people with discounts off the monthly cost of phone and internet service or free smartphones and “free monthly minutes, data, and texting.”

- 4. Categorize connectivity devices appropriately, to simplify procedures while meeting requirements.** Do not categorize these devices as equipment unless this is required by Part A recipient policies. Since tablets and other devices generally cost far less than \$5,000 per unit, they are not considered “equipment” under federal grants management requirements, unless the recipient has an internal equipment policy with a lower minimum unit cost.⁸ This means that no prior permission from HRSA is required to purchase such devices, and they are not subject to depreciation over a period of years or required to be returned to the federal government if funding should end. This simplifies accounting.

KEY COMPONENTS OF INTERNET CONNECTIVITY POLICIES AND PROCEDURES

PC/PBs need clear policies and procedures (P&P) to ensure appropriate, fair and equitable, and cost-efficient actions around connectivity. PC/PBs from a range of jurisdictions have shared the following sound practices to follow, and spell out in P&P, when providing mobile devices and internet access for members who need them in order to participate in remote PC/PB meetings and activities:

- **State conditions under which the PC/PB will fund mobile technology.** The intent should be to allow use of PC/PB support funds where necessary to enable planning council and standing committee members to participate fully in remote PC/PB and committee meetings and other PC/PB-related activities during a public health emergency or other special situation that makes in-person activities either difficult or impossible.
- **Establish clear criteria for determining who may receive devices or data access aids.** Eligibility criteria should be clearly defined, included in PC/PB policies and procedures, and followed consistently. Assistance may be provided to both members of the PC/PB and members of PC/PB committees. Individuals receiving connectivity assistance need not be unaligned consumer members, though consumers may be especially likely to need such assistance. Any PC/PB or committee member who is unable to obtain internet access through other means may be considered eligible, based on local criteria.
- **Clearly state allowable uses of mobile technology, for PC/PB-related activities only.** Devices and data access aids provided with PCS funds are to be used for activities related to PC/PB planning tasks. Devices and data access aids provided with a combination of planning council support and provider funds are to be used for activities related to the PC/PB or the individual’s health care and access to services. Personal use for other purposes should be kept to a minimum, and data plans should not be used for streaming unrelated content.
- **Establish mechanisms to ensure tracking and documentation.** The PC/PB should obtain and keep on file a signed document from each member receiving a device and/or access mechanism, indicating that the device/ data plan was received, and that the member will follow the PC/PB’s established policies and procedures regarding their use and report any damage, loss, or theft to PCS staff.

PCS at one EMA purchases tablets for members when necessary, delivers them in person, and takes a smartphone photograph of the member holding the tablet and the receipt and allowable use form. The photo is filed along with the signed receipt and allowable use form as documentation that the device was purchased and provided to the member.

- **Establish criteria and procedures for terminating the use of mobile technology and reclaiming the device.** For tablets, smartphones, hotspots, or other devices with a useful life beyond a few months, the document signed by the member should include an agreement to return the device if the member leaves the PC/PB. Even if the device is not depreciated, it often has a useful life of several years and can be made available to another member.
- **Adopt formal policies and procedures.** The PC/PB should develop, approve, and consistently follow comprehensive written policies and procedures (P&P) for the purchase, use, and tracking of mobile devices and data access aids. P&P should meet RWHAP requirements and reflect sound practice, and PCS staff should be responsible for ensuring their implementation. The P&P should provide information such as the following (all included in the sample P&P in the Appendix):
 - Purpose
 - Definitions of devices and data service options and other terms
 - A clear statement of the policy
 - Responsibility for implementation and compliance
 - Eligibility for receiving connectivity devices or data service assistance
 - Types of assistance to be provided
 - Allowable use
 - Procedures to be used by PCS in providing assistance
 - Responsibilities of members receiving such assistance
 - Documentation and tracking
 - Handling of violations
 - Attachments (e.g., form acknowledging receipt of device or aid)

Appendix:

Midsize Metro Planning Council Internet Connectivity Assistance Policy

Following is a sample Internet Connectivity Assistance Policy that borrows from several actual Planning Council policies.

I. Purpose

To provide requirements and procedures for the use of Midsize Metro Planning Council funds to help provide planning council and committee members the equipment and data services needed for full participation in planning council-related meetings and activities, including access to materials and meetings held via video and audio conferencing.

II. Definitions

Capital equipment: Under local and federal regulations, an article of “tangible unexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit” (45 CFR 74 and 92). Communications devices as defined under this Policy are NOT capital equipment, need not be depreciated, and do not require prior permission for purchase.

Communications device: Electronic communications equipment including but not limited to tablets, laptops, and smartphones, designed for ongoing rather than short-term use. Also includes mobile hotspots.

Data access aid or mechanism: A means of providing internet access and data for a communications device, such as a data service plan or data card.

Connectivity: The ability to connect electronically to participate in a meeting rather than participating in person; the connection may allow for videoconferencing or audio access only.

Public health emergency: A situation declared by the local, state, or federal Chief Elected Official or top health official to handle an actual or potential public health crisis due to disease, natural disaster, bioterrorist attack, or other significant event. Under a public health emergency, laws and regulations such as Open Meetings Laws may be suspended.

III. Policy

The Midsize Metro Planning Council will provide assistance, as feasible given funding realities, to ensure that all planning council members, standing committee members, and Consumer Caucus members have the electronic devices and data service access necessary to connect to remote planning council and committee meetings, access materials online, and otherwise participate in planning council related activities during a public health emergency or other special situation that makes in-person activities difficult or impossible.

This assistance will be in the form of communications devices and/or data access mechanisms provided partly or entirely through Planning Council Support funds, which are part of the Part A administrative budget.

The Midsize Metro Planning Council will control costs through maximum use of cost sharing opportunities, including programs providing free- or low-cost communications access to eligible individuals.

Where funds are insufficient to assist all eligible members in need of assistance, planning council members will receive priority, followed by committee members.

IV. Procedures

1. Responsibility for Implementation and Compliance:

- a. The Planning Council Support (PCS) Manager will be responsible for managing implementation of this policy and monitoring compliance with its provisions.
- b. The Planning Council Co-Chairs and Executive Committee will be responsible for addressing any violations of this policy by planning council members or committee members.

2. Eligibility:

- a. Planning council members and members of standing committees including the Consumer Caucus are eligible for assistance if they are unable to pay for a device or for data services sufficient for full participation in planning council activities. Members will be asked to provide information sufficient for PCS staff to determine their need for assistance.
- b. Eligibility will be based on financial need rather than category of membership.

3. Types of Connectivity Assistance:

- a. Midsize Metro Planning Council will provide the type of connectivity assistance PCS staff determine to be most cost-effective, considering current connectivity resources of the individual member, the member's connectivity needs based on role, and available PCS resources. For example, an officer (Co-Chair or Committee Co-Chair) will typically use more data than a non-officer, and a planning council member will use more data than a committee member.
- b. If funding permits, Midsize Metro Planning Council will provide eligible members who need a device with either a tablet or a low-cost or loaner laptop, rather than a smartphone, since the small screen size of a smartphone makes it difficult to read PDF documents or large charts such as expenditure reports, which are important for decision making.
- c. Smartphones will be provided where limited funds make this option necessary. In such situations, Midsize Metro Planning Council will work with the member to obtain discounted service through the Lifeline Program, or another available initiative where feasible, and then supplement that discount.
- d. Midsize Metro Planning Council will ensure access to needed data by paying all or part of the costs of data service plans where feasible, since costs are usually lower than for data cards. Data cards will be used only if costs are lower than for comparable data service plans or if the need for assistance is expected to be short-term (three months or less).
- e. Where the member is a consumer, PCS staff will work with medical and support service providers to share connectivity costs to the extent feasible.

- f. Where possible, Midsize Metro Planning Council will purchase the data service plan or card for the member. Where this is not feasible, the cost can be reimbursed to the member monthly, based on an invoice or other documentation from the service provider.

4. Allowable Use:

- a. Connectivity assistance is provided to enable a member to participate in remote planning council-related meetings, review related data and other materials, carry out committee responsibilities, and participate in other planning activities.
- b. If costs are shared with another funder associated with a consumer member's care and treatment, activities related to medical and support services and other care-related activities are also allowable. Other uses are also permitted if the member has received discounted services through the Lifeline Program.
- c. Personal use should be kept to a minimum. Data service plans will generally have data limits, and data paid for by the Midsize Metro Planning Council should not be used for audio or video streaming or downloads unrelated to planning council activities.

5. Procedures for Providing Assistance:

- a. The availability of connectivity assistance will be made known to all planning council and committee members upon passage of this Policy, and new members will be provided information about it when they are appointed.
- b. A member who wishes to request assistance will contact the PCS Manager to discuss current connectivity and needs, any other current assistance (e.g., through a provider), financial need for assistance, and probable eligibility for Lifeline or other available programs that provide connectivity assistance. PCS staff will summarize the request in writing, in an email or letter, and ask the member to confirm that the information is correct.
- c. PCS staff will review requests and budgeted funds at least every two weeks.
- d. If PCS funds available for connectivity assistance are insufficient to meet the needs of all members, planning council and committee Chairs and Co-Chairs will have top priority, followed by other planning council members, then committee members. Where not all individuals in a category who are eligible can receive assistance, individuals to receive assistance will be selected randomly by PCS staff.
- e. PCS staff will explore options, determine the most appropriate device and/or data service mechanism for each member, and arrange it, with cost sharing if feasible.
- f. PCS staff will arrange delivery of a device and/or data access aid to the member, preferably in person, ensure that the member has appropriate instructions for their use, and obtain a receipt.
- g. PCS will arrange for any training needed by the member to use the device and data service efficiently, and ensure someone is available to answer questions and assist as needed, especially in the first few months of use.
- h. PCS will ensure that monthly payments are made for data service access.
- i. If a member receiving connectivity assistance has an unexcused absence, PCS will make contact to ensure that the member is all right and that the absence was not due to a connectivity issue.

- j. PCS staff will check in at least every six months with each member receiving connectivity assistance, to confirm that the assistance is still needed and devices and aids are still functioning.
- k. When the state of emergency or other special situation ends and in-person meetings resume, PCS staff will consult with the Midsize Metro Planning Council about next steps and whether remote connectivity will still be needed, and if so, under what conditions.

6. Responsibilities of Members Receiving Connectivity Assistance:

- a. Any member who needs connectivity assistance is expected to request it through PCS staff, and to provide full and accurate information about needs and financial status. This information will be kept confidential.
- b. Upon receipt of a device and/or data access mechanism, the member will sign a form acknowledging receipt and confirming an understanding of the policies for its use.
- c. The member will retain a copy of the form, which will clearly state how the connectivity device and/or aids may be used for planning council-related activities, responsibility to inform PCS staff if such assistance is no longer needed, and the member's responsibility to report any loss, theft, or damage. The form will indicate whether cost-sharing with other programs or entities is involved, and if so, how that affects allowable use.
- d. A member will inform PCS staff within three business days if the device does not work properly, or of any loss, theft, or damage to a device or data service mechanism, and will work with PCS staff to determine next steps.
- e. A member whose membership in the planning council or one of its standing committee ends will be expected to return any device or data service aid that retains value to PCS staff within five business days after membership ends.
- f. Once the member returns the device, the member and PCS will sign a form acknowledging that all devices and connectivity aids have been returned.

7. Documentation and Tracking:

- a. PCS staff is responsible for working with members to document and track all devices and aids.
- b. PCS staff will obtain a signed form from each member who is provided a communications device or data access aid, at the time it is received.
- c. PCS staff will ensure that signed device and aid receipt forms are provided as documentation to the member receiving assistance, and will keep a copy in planning files.
- d. Since the individual cost of any connectivity device is far below the \$5,000 minimum for equipment, no depreciation will be required. However, PCS staff will ensure that devices are tracked for a minimum of three years or based on their useful life.
- e. PCS staff will keep a list of members and their devices or aids, with serial numbers, costs, and date provided to the member.
- f. If a device or aid is damaged, lost, or stolen, PCS staff will talk with the member, then arrange for repair or replacement as appropriate. If the member was negligent, PCS staff will consult with the planning council Co-Chairs before a determination is made to replace the device.

- g. If the member leaves the planning council or no longer needs connectivity assistance, PCS staff will ensure that devices and/or aids are returned and any data plans are cancelled. Devices that are working properly will be kept by PCS staff and may be assigned to a different member in the future.

8. Handling of Violations:

- a. Midsize Metro Planning Council Co-Chairs and the Executive Committee will be responsible for addressing any violations of this policy by members. This might involve frequent non-participation in planning council or committee meetings, improper use of a device or aid, negligence leading to loss or damage, or providing inaccurate information about the need for connectivity assistance.
- b. PCS staff will inform the Co-Chairs of possible violations, and attempt to resolve the situation informally after receiving their advice. If this effort is not successful, PCS staff will provide information to the Co-Chairs for discussion by the Executive Committee.
- c. The Executive Committee will review the information and may choose to assign 2-3 members to interview the member, or ask the member to come to an executive session of the Committee to explore the situation.
- d. The Executive Committee will specify needed action regarding continued connectivity assistance or expected action by the member. The Committee may direct a reduction in or end to the member's connectivity assistance, reimbursement of funds to the planning council, or, in extreme cases, a recommendation to the Chief Elected Official that the member be removed from the planning council, or the removal of a non-planning council member who serves on a committee.

REFERENCES

- 1 The legislation requires that at least 33% of Planning Council members be consumers of RWHAP Part A services who are not officers, employees, or consultants of RWHAP Part A subrecipients. They do not have a conflict of interest, and are considered “unaffiliated” or “unaligned.”
- 2 The greater the number of people participating in a video conference, the more data used. Data use for a Zoom group meeting could range from 810 megabytes (MB) to 2.4 gigabytes (GB) per hour, and slightly less on a mobile device, depending on the stream quality; see <https://www.whistleout.com/Internet/Guides/zoom-video-call-data-use>. For a WebEx meeting, an hourly session might use 100-500 MB per hour, depending on the amount and format of data; see <https://www.gigxp.com/webex-cellular-data-consumption/>. Data use is reduced when users turn off their own video, so they aren’t uploading a view of themselves.
- 3 The recommended bandwidth (the maximum rate at which you can download data from the internet to your computer) internet speed for participation in a video conference is 1-4 mbps (megabits per second), according to Nerdwallet’s Internet Buyer’s Guide; see <https://www.nerdwallet.com/blog/utilities/how-to-decide-what-internet-speed-you-need/>. Zoom recommends at least 1.0 mbps download speed for group calls, and 2.5 mbps upload and download speed for high-resolution group video calls; see <https://www.highspeedinternet.com/resources/zoom-guide#:~:text=You'll%20need%20a%20minimum,Mbps%20upload%20and%20download%20speeds>. Webex recommends 0.5-2.5 mbps (Receive) and 0.5-3.0 mbps (Send), depending on whether you need standard quality, high quality, or high definition video; see <https://help.webex.com/en-us/WBX22158/What-are-the-Minimum-Bandwidth-Requirements-for-Sending-and-Receiving-Video-in-Cisco-Webex-Meetings>.
- 4 There are some prohibitions on use of funds for such purposes. See e-CFR 200.216 Prohibition on certain telecommunications and video surveillance services or equipment, https://www.ecfr.gov/cgi-bin/text-idx?SID=2312b40f5181614169488e0699a25e61&mc=tru&nnode=se21.200_1216&rgn=div8
- 5 Lifeline is a program run by the Federal Communications Commission (FCC) “to make communications services more affordable for low-income consumers.” Subscribers can use the benefit either for home or mobile phone service or for high-speed broadband. Eligibility requirements vary slightly by state. Generally, individuals qualify if they participate in a federal benefit program such as Medicaid, SSI, SNAP, Section 8 housing assistance, or some tribal programs. They can also qualify based on income, with the upper limit typically about 135% of the federal poverty level (FPL). Websites provide links to states and providers. For information on free cellphones, see <https://www.lifelinesupport.org/>, and <http://freegovernmentcellphone.net/free-government-cell-phones-for-low-income>.
- 6 In addition to free cell phones, Lifeline provides discounts on “monthly telephone service, broadband internet service, or voice-broadband bundled service” when purchased from participating providers. The cell phones are required to have 3G and hotspot functionality, and some companies allow subscribers to use their existing cell phones. Typically, Lifeline provides up to a \$9.25 monthly discount on service. Waivers on recertification, reverification, and other requirements have been extended through November 30, 2020, because of the COVID-19 pandemic. See <https://www.fcc.gov/consumers/guides/lifeline-support-affordable-communications> and <https://www.usac.org/lifeline/>.
- 7 CARES Act funds have already been allocated; however, the period of performance is one year, and some may be using funds for this purpose.
- 8 Federal guidelines require depreciation of items categorized as equipment, which it defines as “articles of tangible unexpendable personal property having a useful life of more than one year and an acquisition cost of \$5,000 or more per unit” (45 CFR 74 and 92).

This project is supported by the Health Resources and Services Administration (HRSA) of the U.S. Department of Health and Human Services (HHS) under grant number U69HA39085: National Training and Technical Assistance (Planning CHATT) Cooperative Agreement. The contents of this resource are those of the author(s) and do not necessarily represent the official views of or an endorsement by HRSA/HHS or the U.S. Government.



**PLANNING
CHATT**

