



# Digital Equity

## Advancing Digital Equity in Housing Credit Properties

2023

Digital equity -- the concept that everyone, everywhere can benefit from digital technologies, including the internet -- is a key element to any thriving community. It is also essential for households to fully participate in the current economy, receive education from an elementary to post-graduate level, and ensure access to quality-of-life services like healthcare and expanded work opportunities. Against the backdrop of an increasingly acute digital divide, which puts underserved and low income communities at a disadvantage, state and local housing finance agencies (HFAs) have a significant opportunity to ensure that residents of [Low-Income Housing Tax Credit \(Housing Credit\)](#) properties have access to affordable and quality internet services, and can do so by incentivizing or requiring developers to:

1. Build broadband infrastructure capable of high internet speeds,
2. Supply affordable in-unit and community internet service,
3. Provide access to internet-enabled devices, and
4. Offer opportunities for digital skill-building.

The following analysis, which examined 53<sup>1</sup> [Qualified Allocation Plans \(QAPs\)](#) released before March 2023, provides insight into how HFAs consider these components of digital equity, the standards to which HFAs hold developers, and the extent to which Housing Credit residents are assured digital connectivity.

See Table 1 for a full summary of HFA strategies to promote digital equity in Housing Credit properties.

### High-Speed Broadband Infrastructure

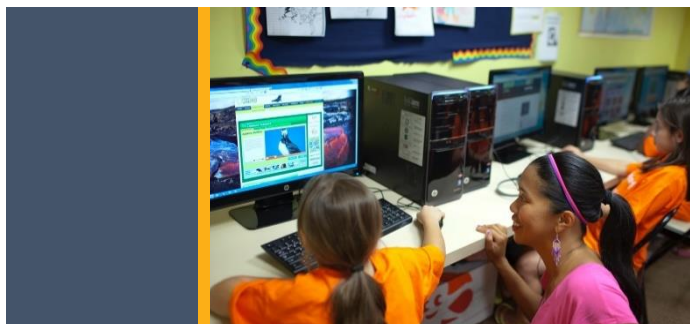
Broadband infrastructure is the critical first step to internet access and consists of cables, fiber optics or wiring integral to the structure that is accessible in each dwelling unit. As of early 2023, 34 HFAs require or incentivize the installation of broadband infrastructure in both new construction and substantial rehabilitation properties receiving an allocation of Housing Credits. Internet speed is important too. Despite [nationally elevating standards for internet](#)

**34** OUT OF  
53 HFAs

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<sup>1</sup> All 50 states, plus DC, New York City and Chicago

[speeds](#), many HFAs do not explicitly detail required internet speeds in their QAPs. Currently, 9 HFAs explicitly reference the Federal Communications Commission (FCC) minimum standard of 25 Mbps for downloading and 3 Mbps for uploading. Another 11 HFAs indicate that broadband infrastructure should be “high speed,” but do not offer specifics of what that means. Only four HFAs elevate internet speed standards above 25/3 to a 100 Mbps standard: Rhode Island, New York State, New York City and Maine.



Residents at Galen Terrace, Washington, D.C.

### Affordable Internet Service in Units and Community Spaces

To make use of broadband infrastructure, residents require internet service offered by an internet service provider through an internet plan. In developments where broadband infrastructure is included but internet service is not, residents carry both the administrative burden of coordinating installation and the cost burden of paying for the plan. To date, 39 HFAs include language on internet service provision in-unit and in community spaces. To ensure affordability for Housing Credit residents, 15 HFAs either incentivize or require free internet service in units, while 10 incentivize or require this free service in community rooms. New York State’s HFA stands out in requiring free internet service both in units and in community spaces.

**39** OUT OF 53 HFAs

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### Internet-Enabled Device Availability

Expanding meaningful access to devices – laptops, desktops, and tablets -- is the next step to closing the digital divide. As of early 2023, 20 HFAs explicitly encourage developers to offer access to devices, primarily through incentivizing computer rooms. Concerns about the quality of the rooms, their utility to residents, and costs for developers have led Texas, Missouri, and Pennsylvania to use an alternative approach: device check-out programs. While Texas and Missouri only encourage device check-out programs if computer rooms with desktops are not provided, Pennsylvania excludes any mention of desktop computers or computer lab space. The Pennsylvania QAP includes specific language about device sharing along with incentives for provision of free internet service. While there are no data yet on developers’ implementation of the relatively new program in Pennsylvania, device check-out programs could prove to better serve resident needs and reduce developer costs associated with the construction and maintenance of full computer rooms.

**20** OUT OF 53 HFAs

explicitly encourage developers to offer access to devices, primarily through incentivizing computer rooms.

## Leveraging Federal Funds for Digital Equity

In recent years, renewed attention on digital equity issues for low-income households has resulted in a shift in federal policy. In late 2021, the FCC [launched the Affordable Connectivity Program \(ACP\)](#), a national broadband and device subsidy program that provides a discount of up to \$30/month on internet service plans. As of August 2023, ACP serves over [20 million households](#). HFAs can encourage developers to use ACP funding to provide low-cost internet service options, as evidenced by [Rhode Island's 2023 QAP](#). Rhode Island's HFA incentivizes developers to coordinate the \$30/month ACP subsidy and only charge eligible residents a maximum of \$9.99/month for at least 15 years of 100 Mbps service. The provision is a shift from Rhode Island's [2022 QAP](#) internet-related provisions, which included an incentive to provide free, 25/3 internet service. While the number of points has reduced for internet provision between 2022 and 2023, the shift is ostensibly [a net benefit to developers](#) who now are effectively permitted to charge tenants for service.



### Digital Skills Training Opportunities

The increasing digitization of the workplace requires increasing access to digital skill building opportunities—especially for low-income households. But few HFAs across the country at present encourage developers to offer these opportunities. Digital skills programs are only explicitly encouraged by 8 HFAs. Language on digital skill building in each of the 8 QAPs varies: Alabama, for example, encourages “computer training” while Missouri invites developers to offer “seminars on the internet.” Among the strongest provisions is Florida’s digital skill building requirement, which has been a feature of the Florida Housing application for over a decade. Though it only applies to senior developments, the provision includes specific language requiring developers to tailor the level of the classes based on the needs and requests of residents, in addition to ensuring the classes are provided on a regular basis at no cost to residents. Virginia’s HFA has taken a different approach to digital skill building. The Virginia QAP ties “internet education information” to Wi-Fi provision, requiring developers to provide residents with internet safety tips along with the required provision of community room Wi-Fi and the incentivized provision of in-unit Wi-Fi.

8

OUT OF  
53 HFAs

explicitly encourage  
digital skills programs.

### Conclusion

By incentivizing or requiring developers to provide quality internet infrastructure and affordable service, available devices, and skills training opportunities, HFAs are committed to ensuring residents of Housing Credit properties have access to an essential tool, allowing them to fully participate in all aspects of modern life.

**Learn more about how QAPs can accelerate the affordability, opportunities, and sustainability of affordable housing on our [QAP analysis home page](#).**

**TABLE 1: State Strategies to Promote Digital Equity in Housing Credit Properties**

HFA	BROADBAND INFRASTRUCTURE		INTERNET SPEED (Mbps)	IN-UNIT INTERNET SERVICE		COMMUNITY SPACE INTERNET SERVICE		DEVICE ACCESS		DIGITAL SKILLS TRAINING	
	Inc.	Req.		Inc.	Req.	Inc.	Req.	Inc.	Req.	Inc.	Req.
AK		x <sup>1</sup>	25/3								
AL						x		x			x <sup>2</sup>
AR											
AZ				x <sup>3</sup>		x <sup>3</sup>					
CA	x		25	x <sup>3</sup>						x <sup>1,2</sup>	
Chicago	x			x <sup>3</sup>				x			
CO											
CT					x						
DC				x <sup>3</sup>							
DE				x		x		x			
FL		x				x		x			x <sup>1</sup>
GA				x <sup>1,3</sup>			x <sup>3</sup>				
HI											
IA		x	25								
ID		x	"high speed"			x		x			
IL		x									
IN	x		"high speed"	x <sup>3</sup>		x <sup>3</sup>		x <sup>2</sup>		x <sup>2</sup>	
KS		x		x <sup>1,2,3</sup>				x <sup>1,2</sup>			
KY		x	"adequate"				x				
LA		x			x	x		x <sup>2</sup>			
MA		x			x						
MD		x	"high speed"				x		x <sup>4</sup>		
ME		x	100/100		x <sup>1,3</sup>						
MI		x	25/3		x						
MN											
MO		x	25/3			x		x <sup>1,2</sup>			x <sup>1,2</sup>
MS				x		x		x			
MT											
NC											
ND		x	25/3								
NE	x		"high speed"	x <sup>3</sup>							
NH		x				x <sup>3</sup>			x <sup>2</sup>		
NJ			"high speed"	x							
NM		x	25/3							x <sup>1</sup>	
NV		x		x <sup>3</sup>		x		x			
NY		x	100		x <sup>3</sup>		x <sup>3</sup>	x <sup>2</sup>			
NYC		x	100/100		x <sup>3</sup>						
OH		x	25/3				x <sup>3</sup>				
OK	x		25/3			x		x			
OR											
PA		x	25/3	x <sup>3</sup>		x <sup>3</sup>		x			
RI		x	100	x							
SC		x	"high speed"				x <sup>3</sup>		x		
SD		x	"high speed"	x							
TN				x		x <sup>1,2</sup>		x <sup>1</sup>			
TX				x		x		x			
UT				x <sup>3</sup>		x <sup>3</sup>		x			
VA	x <sup>1</sup>		"high speed"	x <sup>3</sup>			x <sup>3</sup>			x <sup>4</sup>	
VT											
WA		x	25/3	x		x					
WI		x	"high speed"		x						
WV	x <sup>1</sup>		"high speed"	x		x				x <sup>2</sup>	
WY	x <sup>1</sup>		"high speed"								
<b>Total</b>	<b>34/53</b>			<b>29/53</b>		<b>25/53</b>		<b>20/53</b>		<b>8/53</b>	

<sup>1</sup> For specific projects, populations or uses only  
<sup>2</sup> To be selected from a list of approved services  
<sup>3</sup> Service must be offered free of charge to tenants  
<sup>4</sup> Contingent on Wi-Fi provision