
September 10, 2019

The Honorable Michael Doyle
Chairman
Subcommittee on Communications
and Technology
Committee on Energy and Commerce
House of Representatives
2125 Rayburn House Office Building
Washington, D.C. 20515

The Honorable Robert Latta
Ranking Member
Subcommittee on Communications
and Technology
Committee on Energy and Commerce
House of Representatives
2322 Rayburn House Office Building
Washington, D.C. 20515

Dear Chairman Doyle and Ranking Member Latta:

Western Governors appreciate the Subcommittee's attention to the important matter of broadband mapping accuracy as you convene your September 11, 2019 hearing on Legislating to Connect America: Improving the Nation's Broadband Maps. Attached please find three Western Governors' Association (WGA) policy resolutions that address broadband deployment:

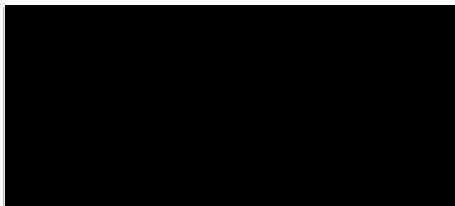
- WGA Policy Resolution [2019-04](#), Health Care in Western States;
- WGA Policy Resolution [2018-13](#), Workforce Development in the Western United States; and
- WGA Policy Resolution [2017-09](#), Western Agriculture.

Also attached is a July 16, 2018 [letter](#) to National Telecommunications and Information Administration Assistant Secretary David J. Redl expressing concern about the use of census block-level reporting in the Federal Communication Commission's Form 477 reporting process.

I request that these documents be included in the permanent record of the hearing, as they articulate Western Governors' policy positions and concern on this important issue.

Please contact me if you have any questions or require further information. In the meantime, with warm regards and best wishes, I am

Respectfully,



Attachments



Policy Resolution 2019-04

Health Care in Western States

A. **BACKGROUND**

1. Ensuring access to high-quality, affordable health care services is an important element of maintaining and enhancing the quality of life in western states for our growing populations. It is the basis for healthy communities and healthy economies.
2. Western states face unique challenges in health care, including growing rates of substance use disorder, provider shortages in underserved and rural areas, and limited access to broadband. Low population densities and the vast distances between population centers also make it difficult for providers to establish economically-sustainable health care systems in rural areas.
3. Distance and density also inhibit construction of the technology infrastructure that would provide or improve broadband connectivity in underserved and rural areas. Expanding broadband access provides numerous quality-of-life benefits for rural Americans, including economic development, social connectivity, education, public safety, and access to telehealth and telemedicine.
4. The health care sector faces severe personnel shortages in western states, despite efforts of Western Governors, such as the foundation of Western Governors University and other medical training programs in western states, to ensure adequate numbers of qualified medical personnel. This challenge is particularly acute in the West's underserved and rural areas. Ensuring access to health care services requires an adequate number and distribution of physicians, nurses and other trained health care professionals. Population growth, aging residents, and challenges involving Tribal health care and services for veterans require a renewed focus on developing our nation's health care workforce.
5. Western states struggle with access to behavioral health services and higher-than average suicide rates. The ten states with the highest suicide rates in the nation are all located in the West.
6. Substance use disorder (SUD), including alcohol and drug misuse, is a major public health and safety crisis affecting nearly 21 million Americans. It is particularly prevalent in western states where individuals are more likely to have SUD during their lifetime. SUD crosses all social and economic lines and tragically takes the lives of tens of thousands of Americans every year. While state and federal progress has been made to fight this epidemic, additional efforts are necessary to help bridge prevention and treatment gaps in western states.
7. In many cases, health disparities and barriers to accessing health care are particularly acute for certain populations in the West. A better understanding of the role that social determinants play in health outcomes can inform the development of effective health policy to increase access for these populations.

8. Western states have a unique body of experience, knowledge and perspective with respect to health care. The Western Governors' Association (WGA) is ideally situated to collect and disseminate information, including best practices, case studies and policy options, that states can use to improve the foundation for health care services and advocate for shared policy priorities on behalf of their citizens.

B. GOVERNORS' POLICY STATEMENT

1. Federal efforts to address health care workforce and access needs should reflect early, meaningful and substantive input from Governors, who are best positioned to assess the needs of their states and help develop solutions to meet these needs. State-federal collaboration and coordination are integral to addressing these health care challenges. Wherever possible, and where appropriate, the federal government should respect state authority and maximize flexibility granted to states and Governors.
2. The federal government should work with states to facilitate the deployment of broadband to underserved and rural areas, recognizing that adequate broadband access has a direct correlation on rural populations' ability to access telehealth and telemedicine.
3. Despite efforts by Western Governors to address the shortage of qualified health care workers, significant challenges remain. Governors urge the federal government to examine and implement programs to ensure states have an adequate health care workforce – including in primary care and other in-demand specialties – that is prepared to serve diverse populations in urban, suburban, and rural communities. Governors also support efforts to increase the diversity of the health care workforce to improve health outcomes for all.
4. Western Governors support efforts to improve the quality and quantity of behavioral health services available to our residents, as these services are essential to reducing suicide rates and treating a range of behavioral health conditions, including substance use disorder.
5. The federal government should work toward treating addiction as a chronic illness and work with Western Governors to develop strategies for addressing substance use disorder that work in concert with state efforts and recognize regional variations in substance use disorder patterns.

C. GOVERNORS' MANAGEMENT DIRECTIVE

1. The Governors direct WGA staff to work with Congressional committees of jurisdiction, the Executive Branch, and other entities, where appropriate, to achieve the objectives of this resolution.
2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

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Policy Resolution 2018-13

Workforce Development in the Western United States

A. **BACKGROUND**

1. Workforce development efforts contribute to the economic well-being of western states by enabling people to find fulfilling, well-paying jobs, fostering economic mobility, and ensuring that businesses have access to the skilled employees they need to thrive.
2. Western states had an average unemployment rate of just under 4.0 percent in March 2018.¹ Many businesses report that they cannot find qualified candidates for open positions. At the same time, many jobseekers are unable to find good jobs for which they are qualified.
3. Workforce development challenges are particularly acute in rural communities, which are commonly characterized by higher rates of unemployment, a lack of economic diversity, geographic isolation, and limited infrastructure, including access to broadband.
4. Economic equity continues to be a problem across states, with people of color and people with disabilities, regardless of career preparation and credential levels, seeing poorer rates of employment and earnings than majority populations.
5. There are 6.6 million unfilled jobs in the United States due in part to a shortage of workers with the skills and qualifications to fill those positions.² The largest gap is in middle skills jobs, which require more than a high school diploma but less than a four-year degree.
6. Postsecondary education and training is critical in today's economy. Almost 80 percent of jobs in the United States require a postsecondary credential, including certificates, associate degrees, four-year degrees, and licenses.³
7. On average, those holding a bachelor's degree earn more than those who have not attained that degree, but those who do not reach that level of education can still find good employment. There are 30 million jobs that don't require a four-year degree and pay at least \$35,000 per year with a median salary of \$55,000.⁴
8. Education systems have not kept pace with economic realities. Student success is traditionally perceived, and measured, as moving directly from high school to a four-year degree program. Today, only 20 percent of students successfully complete that traditional

¹ Bureau of Labor Statistics, Local Area Unemployment Statistics, May 18, 2018.

² Bureau of Labor Statistics, Job Openings and Labor Turnover Summary, May 8, 2018.

³ National Skills Coalition, [United States Middle-Skill Fact Sheet](#), February 2017.

⁴ Carnevale, A.P., Strohl, J., and Ridley, N., [Good Jobs that Pay Without a BA: A State-by-State Analysis](#). Georgetown University Center of Education and the Workforce, 2017.

pathway to their career.⁵ The rest are finding their own pathways to success, which may include entering the world of work or pursuing other types of credentials. Many, however, encounter obstacles.

9. On average, only about one-third of high schoolers are engaged in school, meaning that two-thirds are not actively involved in or enthusiastic about school.⁶ Three million young adults ages 16-24 are not participating in either work or education.⁷
10. Additionally, many Americans start a college degree but do not complete it, leaving them with the burdensome costs of higher education but no wage benefit – 35 million people over 25 have some college credits but no degree.⁸
11. As students increasingly pursue indirect routes to higher education, over 70 percent of students enrolled in postsecondary education are now “nontraditional students” who may be older, working full or part time, or caring for children.
12. Technology will continue to be a disruptive force in the labor market, driving potentially drastic changes in the labor demands of certain industries. It is expected that many jobs that will be in demand in 2030 do not yet exist. Workers will need to be able to acquire new skills over their careers to adapt to change. Up to one-third of U.S. workers in 2030 may need to learn new skills or move into a new occupation due to the impacts of automation.⁹
13. To address these issues, Western Governors have prioritized a variety of workforce development efforts, from better aligning education with labor market demands to expanding workforce services and training opportunities for the unemployed and underemployed to attracting more skilled workers.
14. Western states are also leading the way on expanding work-based learning opportunities for both students and adults. Work-based learning programs, including registered apprenticeships, allow people to acquire in-demand skills while earning a salary.
15. Employer leadership is critical to ensure that workforce development efforts are satisfying the needs of an ever-changing economy. Businesses in the West have taken an active role in working with educational institutions and workforce agencies but increasing industry participation will remain critical.

B. GOVERNORS' POLICY STATEMENT

1. Western Governors recognize that there are many pathways students can take to a successful career, including short-term education and skills training or work-based learning

⁵ U.S. Department of Education, National Center for Education Statistics, [The Condition of Education 2017](#), May 2018.

⁶ [2016 Gallup Student Poll Snapshot Report](#)

⁷ Brookings, [Employment and disconnection among teens and young adults: The role of place, race, and education](#), May 2016.

⁸ U.S. Census Bureau, Educational Attainment in the United States: 2017, December 14, 2017.

⁹ McKinsey Global Institute, [Jobs Lost, Jobs Gained: Workforce Transitions in a Time of Automation](#), December 2017.

programs such as registered apprenticeships. Students and jobseekers should have access to understand their options and the potential outcomes of these programs.

2. Facilitating lifelong learning is essential to prepare for the impacts of technology on the labor market. Western Governors encourage Congress to increase student access to short-term education and skills training programs in reauthorization of the Higher Education Act, including through expanding the Pell Grant program to include high-quality short-term training programs leading to industry-recognized credentials. These flexible work-force oriented funds should be coupled with plans to adopt and report outcomes metrics tied to employment and earnings to maximize the success of this policy in equipping workers for high-opportunity jobs and careers.
3. Western Governors also support the expansion of work-based learning programs, including registered apprenticeships. Western Governors encourage Congress and federal agencies to support and incentivize state-, local-, and industry-led partnerships to create and scale work-based learning and apprenticeship programs. New federal investments in apprenticeships should align with existing efforts to foster a coherent system with minimal duplication at the federal, state, and local level.
4. Career and technical education (CTE) helps expose students to their career options and develop skills they will need in the workforce. Western Governors call on Congress to reauthorize and fully fund the Carl D. Perkins Career and Technical Education Act. Reauthorization of the act should take into consideration the following principles:
 - Governors and states are in the best position to determine how to use federal CTE funding to meet the unique needs of their economies.
 - High-quality CTE programs should lead to in-demand, high wage careers; include career and academic advising; include pathways to four-year degrees, for example through articulation agreements or stackable credentials; and develop employability skills through integrated education and training, work-based learning or leadership opportunities.
5. Western Governors note that federal funding for workforce development through the Workforce Innovation and Opportunity Act supports economic growth and job creation in the states. Western Governors request that the 15 percent reserve for statewide activities be maintained. This funding allows Governors to be flexible in addressing state needs and supports innovation.
6. Western Governors encourage the federal agencies, including the U.S. Department of Labor and U.S. Department of Education, to coordinate their efforts to better align federal workforce development, career and technical education, and higher education programs.
7. Western Governors recognize the benefits of measuring and reporting outcomes by institution and program. Reporting completion rates, employment and earnings will provide useful information for students and their families and help promote the success of these programs to prepare students for in-demand jobs and careers in their regions. Western Governors encourage Congress to include the College Transparency Act in reauthorization of the Higher Education Act, to adopt and report on earnings, employment,

and credential attainment metrics by education provider and individual program in a manner that protects student privacy and ensures data security.

8. Employers play an important role in state workforce development efforts. Western Governors support efforts to incentivize employers to play a more active role in talent development, through partnership with state workforce development agencies and educational institutions or investments in the skills and training of their employees.
9. Rural communities are at risk of falling further behind in skills necessary for the economy of the future due to a lack of broadband access. Western Governors encourage federal agencies and Congress to continue to deploy resources to solve this urgent need.
10. Professional licensing requirements vary by state and can create a barrier to mobility for professionals in western states. Where possible, Western Governors should work together to minimize this barrier.

C. GOVERNORS' MANAGEMENT DIRECTIVE

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2. Furthermore, the Governors direct WGA staff to consult with the Staff Advisory Council regarding its efforts to realize the objectives of this resolution and to keep the Governors apprised of its progress in this regard.

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Western Governors' Association Policy Resolution 2017-09

Western Agriculture

A. BACKGROUND

1. Agriculture and forestry in the western states and territories are significantly different than in other regions of the country. We have greater variations in soil, climate, terrain, commodities and production practices, and water availability.
2. Farms, forests, and rangelands are important contributors to the economies and quality of life of western states. Among other important values, western agricultural and forest lands are primary sources of open space, wildlife habitat, water supplies, and diverse rural economic opportunities in the recreation, food, fiber, energy and bio-based product industries.
3. Trade promotion plays an important role in ensuring that western agricultural products and food have an opportunity to compete with products produced and subsidized internationally.
4. Western states have seen some of the most significant increases in per-capita veteran populations since 2000, including surges in returning veterans under the age of 25. It is estimated that nearly 25 percent of all veterans live in rural areas. These veterans have slightly lower rates of employment compared to veterans living in urban areas and to their non-veteran rural colleagues.
5. Responsible management of federal lands is a significant concern for Western Governors. Western states include more than 75 percent of our national forest and rangeland ecosystems. These public lands serve as critical economic drivers, and they provide numerous conservation benefits, water supply, and recreational opportunities for Western communities and the nation.
6. The West's network of land-grant universities and colleges, including Cooperative Extension Service programs, continue to provide national leadership in research to develop more resilient seeds and crops, manage soil health, advance technology deployment in the bio-based economy and conduct on-farm research experiments that help farmers and ranchers be more effective and efficient.
7. Western Governors recognize that nutrition assistance programs can meet the needs of children and the most vulnerable, while creating economic opportunity across the

agriculture supply-chain from the store where food is purchased, all the way back to the farm. Western Governors acknowledge recent efforts to reduce rates of nutrition program fraud and abuse, deliver programs under budget, and improve program effectiveness.

8. Many agricultural producers in the West rely on irrigation water delivery systems that are shared among multiple producers and operated by an irrigation district, canal company, or mutual ditch company.

B. GOVERNORS' POLICY STATEMENT

1. Western Governors support funding for the U.S. Department of Agriculture (USDA) Market Access and Foreign Market Development Programs to promote opportunities for western producers to increase export revenues and encourage trade agreements that maximize benefits for the West's farmers, ranchers and forest landowners.
2. Western Governors support adequate funding for the USDA Specialty Crop Block Grant Program (SCBGP) that provides critical research, education, and promotion tools to the fruit and vegetable producers.
3. Western States have experienced sharp declines in farm income and farm prices since 2013. Western Governors support a farm safety net that recognizes past deficit reduction contributions of the agricultural sector and maintains funding for other key commodity, conservation, crop insurance, research, energy, and export promotion programs. In particular, Western Governors note that the Conservation title of the 2014 Farm Bill contributed to deficit reduction, saving taxpayers \$6 billion by consolidating 23 programs into 13, streamlining and targeting delivery to farmers, ranchers, and foresters. Western Governors support farm bill funding levels based on need rather than baseline budget targets.
4. Western Governors encourage the expansion of programs that can meet the unique educational, training, technical and financial needs of new, beginning and veteran farmers and ranchers and other USDA programming that can help returning veterans develop and expand business opportunities in rural communities.
5. Western Governors continue to support collaborative, targeted and voluntary conservation to address locally identified natural resource issues for farm, range, and forest resource concerns on private and public lands, such as soil health, air and water quality, drought and wildfire resilience, wildlife habitat conservation and invasive species. Western Governors support the role of conservation title programs in providing voluntary solutions to threatened and endangered species, water quality impairments, groundwater recharge, and other regulatory concerns potentially facing producers.

6. Western Governors support an increase in the role that state and local governments have in managing public lands for multiple uses, including agriculture.
7. Western Governors continue to urge Congress to provide a comprehensive solution for the current approach to budgeting for wildland fire for the Departments of Interior and Agriculture. Any fire budget solution must address the chronic problem of the rising costs of wildfire and the complicating problem of mid-season budget transfers when appropriated funding becomes insufficient. A comprehensive fix is needed to address capacity constraints and allow for a predictable program of work for agencies to fulfill their management responsibilities.
8. Western Governors acknowledge significant progress toward achieving forest restoration goals by using authorities granted in the 2014 Farm Bill. Western Governors support permanent authorization of the Insect and Disease designation provisions of section 602 of the 2014 Farm Bill and the elimination of project constraints from section 603 for condition class or fire regimes outside of the Wildland Urban Interface (WUI). Western Governors also support creating additional flexibility to Good Neighbor Authority to address conflicting language on road construction and reconstruction and the uses of program income. The lack of flexibility restricts opportunities for states to partner in shared stewardship work across boundaries.
9. Within the context of comprehensive wildland fire budget reform, existing law and forest plans, Western Governors support the use of new tools to streamline environmental analysis to increase the pace and scale of restoration activities. Specifically, Western Governors support creation of a new pilot program to prioritize landscape-scale environmental analysis for restoration projects envisioned over geographies greater than 100,000 acres. This pilot program should allow for predictable project-scale implementation and adaptive management. Western Governors believe federal agencies should develop guidance to build consistency in environmental analysis and bring agency practice in conducting environmental assessments (EAs) more in line with the administrative policy intent of streamlined, summary documents. Western Governors affirm that Congress should resolve outstanding issues with potential requirements to reinstate endangered species consultations following the adoption, amendment or revision of an appropriate management plan.
10. Western Governors support Congress establishing a restoration categorical exclusion (CE) based on a record of analysis from the past five years of projects where agency analysis and a decision recognized a finding of no significant environmental impact. Western Governors support allowing federal agencies to analyze only the action and no-action alternatives when a project is collaboratively developed, unless a third alternative is proposed during scoping and meets the purpose and need of the project. Western Governors also support rewarding successful implementation of collaborative projects

through funding, retained-receipt authority, or other capacity to pursue subsequent projects.

11. Western Governors support efforts to expand research funding to address drought, a changing climate and extreme weather risks facing western producers.
12. Western Governors encourage the effective use of extension and other partnerships to deliver practical tools, technologies and information to farmers, ranchers and forest landowners.
13. Nutrition assistance programs should continue to allow flexibility for states to respond to unique economic conditions, serve all eligible participants without drastically reducing benefits, and encourage continued pursuit of transparency and accountability in program administration.
14. Western Governors support changes to Conservation Title programs that remove existing contracting barriers for western producers, and make the Farm Bill's conservation title programs more accessible and relevant to western producers and their associations.
15. Western Governors support coordinated state and federal action to expand markets for wood products that can achieve forest and rangeland restoration objectives and foster rural employment and income opportunities. Western Governors support coordinated financing and grant support from USDA Rural Development programs and the USDA Forest Service to advance wood product business development, infrastructure, and demonstration products in the areas of mass timber construction and biomass energy.
16. Western Governors support the USDA, Animal and Plant Health Inspection Service (APHIS) and Agriculture Research Service (ARS). APHIS works in partnership with state departments of agriculture to monitor, prevent and control infestations of invasive pests and diseases and curtail or minimize wildlife conflicts, which can cause widespread environmental and economic damage and safety hazards. APHIS works in cooperation with other federal agencies, states, territories, counties and private entities to implement management programs. ARS conducts research to develop and transfer solutions to agricultural problems of high national priority, and shares information to ensure high quality, safe food and other agricultural products. ARS research helps sustain a competitive economy; enhance the natural resource base and the environment; provide economic opportunities for rural communities and society as a whole, and; provide the necessary infrastructure to create and maintain a diverse workplace.
17. Western Governors support the continued efforts of the Rural Utilities Service to provide financial assistance for drinking water, wastewater facilities and broadband connectivity in rural and remote areas, particularly in communities that have minimal or

no such infrastructure. Expanding broadband access to rural America will allow citizens to compete in a global market and have access to IT health care, education and public safety resources.

18. Western Governors support the recommendations identified over the course of the WGA National Forest and Rangeland Management Initiative, and incorporate those recommendations related to the reauthorization of the Agricultural Act into this resolution by reference.

C. GOVERNORS' MANAGEMENT DIRECTIVE

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July 16, 2018

David J. Redl
Assistant Secretary for Communications and Information
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue, N.W.
Washington, D.C. 20230

Dear Assistant Secretary Redl:

As Executive Director of the Western Governors' Association (WGA), I am pleased to have the opportunity to provide comments on the importance of improving the quality and accuracy of broadband availability data, particularly in rural areas. High-quality data is necessary to ensure that public broadband deployment efforts are cost effective and prioritize areas that either wholly or significantly lack access.

WGA is an independent organization representing the Governors of 19 western states and three U.S. territories in the Pacific. The Association is an instrument of the Governors for bipartisan policy development, information-sharing and collective action on issues of critical importance to the western United States.

Western states contain many rural areas that lack sufficient access to broadband, as evidenced by the Connect America Funding Phase II [eligible areas](#) and the Federal Communication Commission's (FCC) recently updated [broadband map](#). This widespread lack of connectivity limits communities' access to health care and public safety resources; prevents businesses from competing in the digital economy and diminishes students' access to education and training opportunities. WGA Policy Resolution [2018-13](#), *Workforce Development in the Western United States*, expresses the support of western Governors for congressional and federal efforts to deploy broadband to rural communities to promote workforce development efforts.

Federal efforts, such as the Rural Utilities Service's new broadband pilot program, are critical to closing the digital divide. WGA is concerned, however, that the FCC's updated broadband map is not sufficiently accurate nor granular enough to support efficient and effective broadband deployment in the West.

Through the Form 477 reporting process, the FCC considers a census block "served" if a single residence in the block has access to broadband. This reporting protocol overstates broadband availability in larger, rural census blocks common in western states. WGA is also concerned that the use of "maximum advertised," not "actual," speeds when mapping broadband coverage does not accurately portray the service that customers receive.

On behalf of Western Governors, I encourage you to pursue meaningful partnerships with states to help address these concerns. Please let WGA know how we may meaningfully contribute to your efforts to improve the quality of broadband data and ensure the efficient and effective use of federal funds to promote broadband deployment.

