Methodist Healthcare Ministries
SERVING HUMANITY TO HONOR GOD

October 29, 2026

Broadband Development Office
Texas Comptroller of Public Accounts

Re: Public Comment on the Broadband Development Office Strategic Plan Blueprint

Methodist Healthcare Ministries of South Texas Inc. is a private, faith-based nonprofit organization focused on improving access to healthcare for uninsured and low-income families in 74 counties across South Texas. Our mission of "Serving Humanity to Honor God" calls us to do all we can to enhance the well-being of the people and places we serve so that health equity is achievable and all can thrive. Since our founding in 1995, our co-ownership of the Methodist Healthcare System has supported our programs and services.

Advancing digital equity is fundamental to our strategy. Without it, our community cannot address the root causes of inequities in health and well-being. Public health researchers have described broadband internet access as a "super-determinant of health," given that it influences access to essential resources, including health care, education, and employment.[1] Recognizing the importance of this access, Methodist Healthcare Ministries invested more than $35 million in digital equity initiatives across our service area to help individuals and families access the tools, develop the skills, and obtain the connectivity they need to meet their health, economic, and social needs.

Our experience reinforces that broadband infrastructure is necessary for both the underserved and the broader public good. However, maximizing the return on public investment requires ensuring that residents can afford, access, and effectively use the connectivity that has been deployed. For these reasons, we encourage the Broadband Development Office (BDO) to consider strengthening the following sections:

[1] Crock Bauerly B, McCord RF, Hulkower R, Pepin D. Broadband access as a public health issue: the role of law in expanding broadband access and connecting underserved communities for better health outcomes. *J Law Med Ethics*. 2019;47(2 suppl):39–42. doi:10.1177/1073110519857314.

Methodist Healthcare Ministries
SERVING HUMANITY TO HONOR GOD

Section 1: Executive Framework

We support the Broadband Development Office's commitment to expanding broadband access across Texas. However, we encourage the BDO to adopt a broader definition of closing the digital divide that extends beyond connecting unserved and underserved locations using infrastructure investments.

While the Strategic Plan's mission appropriately references affordable broadband and participation in the digital economy, the Plan's vision is more narrowly focused on infrastructure deployment. Texans need more than quality infrastructure to close the digital divide and achieve meaningful access to the digital economy. Without a comprehensive vision for digital access, Texans will not be able to fully participate in education, healthcare, workforce opportunities, and civic life.

We recommend that the vision explicitly acknowledges the factors that influence meaningful broadband adoption, including:

- Broadband affordability
- Access to appropriate devices
- Digital skills and digital literacy
- Community-based support and technical assistance

Maximizing taxpayer investment means ensuring that broadband infrastructure is not only available but actively used by residents, businesses, and institutions.

Suggested addition:

"Support meaningful broadband adoption by recognizing the importance of affordability, device access, digital skills, and community-based support in helping Texans participate in the digital economy."

Section 3: Stakeholder and Regional Engagement

The important goals outlined in this section would benefit from clearer strategies, especially regarding implementation, prioritization, and measurable outcomes. We

strongly support the proposed regional workgroups, convenings, and designated Council of Government (COG) contacts as mechanisms to strengthen local engagement and coordination. To ensure regional planning reflects the full range of community needs, we recommend explicitly including:

- Community-based organizations
- Digital inclusion practitioners
- Healthcare providers
- Libraries
- Educational institutions
- Other trusted local partners

These organizations provide direct insight into broadband adoption barriers and can help identify solutions that infrastructure-focused planning may overlook.

We also encourage the BDO to:

- Define how resource coordination efforts will be evaluated and measured.
- Leverage existing regional broadband coalitions and digital opportunity initiatives, rather than creating duplicative structures.
- Incorporate community feedback on adoption barriers alongside infrastructure needs assessments.
- Consider additional engagement strategies for rural and underserved communities that may lack the staffing or organizational capacity to participate consistently in statewide planning processes.

Given limited public resources, stakeholders would benefit from a clearer framework that demonstrates how coordination efforts will lead to measurable improvements in broadband adoption and economic opportunity.

Section 4.5: Non-Deployed Broadband Equity, Access, and Deployment (BEAD) Funds

We recognize the uncertainty surrounding approximately $2 billion in unobligated BEAD funding and the limitations imposed by current federal guidance. We also understand that

there are challenges related to the distribution of obligated funding to subgrantees. According to data released by the Comptroller's office, there is approximately $460 million in BEAD funding obligated to the 74 counties in MHM's service area, payments which are currently on hold as the BDO navigates uncertainties at the federal and state levels. While these constraints create challenges, we encourage the BDO to maintain flexibility and continue evaluating opportunities to support digital opportunity and broadband adoption initiatives, should future guidance permit.

Specifically, we recommend:

- Developing criteria for evaluating potential digital investments based on measurable outcomes, cost-effectiveness, return on investment, and demonstrated community need.
- Framing adoption investments as complementary economic development strategies that maximize the value of existing infrastructure investments.
- Recognizing that community-based digital opportunity programs can increase local use of broadband networks, without necessarily creating significant long-term state funding obligations.
- Remaining actively engaged with digital opportunity stakeholders while monitoring future federal policy developments.

Broadband infrastructure generates its greatest return when residents and businesses use it as a resource to access employment, education, healthcare, and economic opportunities.

Section 5: Adoption and Public Resource Access

While the plan contains a comprehensive approach to broadband infrastructure, it provides less analysis regarding the barriers that prevent many Texans from adopting and effectively using broadband services.

We recommend that the BDO explicitly recognizes the role of:

- Digital navigation services

- Digital skills training
- Affordable device programs
- Broadband affordability assistance programs

These strategies complement infrastructure investments and help ensure residents can take full advantage of connectivity. We also encourage the BDO to strengthen partnerships with organizations already delivering these services across Texas.

Public Health Considerations

The plan appropriately identifies public health as an area for broadband needs assessment and references telehealth services. However, access to telehealth platforms does not automatically translate into successful use.

We recommend assessing barriers related to:

- Telehealth appointments
- Patient portal access and use
- Online benefits enrollment
- Access to reliable health information
- Digital skills required to navigate healthcare services

Suggested addition:

"Incorporate digital readiness and digital skills considerations into the public health needs assessment, including the ability of residents to access and navigate telehealth, patient portals, online benefits enrollment, and other essential digital health resources."

Finally, even when funding opportunities are limited, the BDO can continue playing an important role by bringing together stakeholders, sharing information, and identifying opportunities to align existing resources and programs.

Methodist Healthcare Ministries
SERVING HUMANITY TO HONOR GOD

Section 7: Key Performance Indicators

We support the inclusion of broadband adoption as a performance measure and appreciate the recognition that deployment alone is not sufficient. However, subscription rates may not fully capture whether Texans are benefiting from broadband access.

We recommend expanding performance measures to include indicators related to:

- Broadband affordability
- Sustained subscriptions over time
- Digital skills and readiness
- Barriers to accessing essential online services
- Utilization of broadband for workforce, education, healthcare, and other key outcomes

We also encourage the BDO to:

- Use existing regional data sources whenever possible to limit reporting burdens.
- Track outcomes geographically to better understand disparities affecting rural, low-income, and underserved communities.
- Consider measures that assess meaningful use, not simply availability or initial subscriptions.

Suggested addition:

"Expand broadband adoption performance measures to include indicators of affordability, sustained subscription, digital skills needs, and barriers to accessing essential online services, using available data and regional stakeholder input."

Texas has made significant progress in expanding broadband infrastructure. As the Strategic Plan Blueprint moves forward, we encourage the BDO to define success not only by where broadband is available, but also by whether Texans can afford it, access it, and use it effectively to improve their health, education, workforce participation, and economic

opportunity. Doing so will help maximize infrastructure investments and translate their benefits into meaningful and lasting resources for communities across the state.

Thank you for the opportunity to provide input on the Strategic Plan Blueprint. Methodist Healthcare Ministries of South Texas welcomes continued engagement with the Broadband Development Office as the final plan is developed, and we would be glad to serve as a resource on digital opportunity and community health across our 74-county service area.

Respectfully submitted,

Samantha Hernandez, PhD.
Director of Policy and Advocacy
Methodist Healthcare Ministries of South Texas, Inc.
[redacted]