



October 21, 2026

Jennifer Duane, Director
Grants Management, Administration, and Compliance
Office of Internet Connectivity and Growth
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 4874
Washington, DC 20230
broadbandusa@ntia.gov

Dear Ms. Duane:

The Consortium for Constituents with Disabilities (CCD) Technology and Telecommunications Task Force undersigned organizations appreciate the opportunity to comment on the proposed revision to the Competitive Grant Program (CGP) application forms information collection (OMB Control Number 0660-0055). CCD is the largest coalition of national organizations working together to advocate for federal public policy that ensures the self-determination, independence, empowerment, integration, and inclusion of children and adults with disabilities in all aspects of society.

As NTIA prepares the revised application forms and the new Notice of Funding Opportunity, we ask that individuals with disabilities be kept as a recognized covered population and treated as a priority, and that accessibility be built into both the application process and the funded activities.

Individuals with disabilities are among the least connected populations in the country. Roughly 23 percent of adults with disabilities do not use the internet, compared to about 8 percent of adults without disabilities. Keeping disability as a covered population ensures that the program continues to reach the people who face the widest gaps in connectivity, devices, and digital skills. If disability is not clearly named in the application forms, it can

be lost in general narrative sections and become difficult to evaluate consistently across applications.

To keep disability and accessibility as visible and measurable priorities, we respectfully recommend the following:

- 1) The application forms should retain individuals with disabilities as a covered population and allow an applicant to identify this group as a primary population served rather than a secondary consideration. People with disabilities frequently intersect with other covered populations, including older adults, rural residents, veterans, and racially and ethnically diverse communities. Fields that reflect this intersection will produce richer and more useful data for NTIA.
- 2) The forms should include explicit prompts asking applicants to describe how their proposed activities, devices, training, and public facing materials will be accessible to people with disabilities. Clear prompts produce clear answers. They also reduce guesswork for both applicants and reviewers.
- 3) NTIA should ensure that every application form and online portal fully complies with Section 508 of the Rehabilitation Act. An application system that is not accessible creates a barrier for the very applicants best positioned to serve people with disabilities.

By keeping disability as a covered population and a priority, and by building accessibility into the process, NTIA will be better positioned to identify and fund projects that bring connectivity, devices, and digital skills to the millions of Americans with disabilities who remain disconnected. The CCD Technology and Telecommunications Task Force welcomes the opportunity to serve as a resource as NTIA finalizes this collection.

Sincerely,

Access Ready

American Association of People with Disabilities

American Council of the Blind

Association of Assistive Technology Act Programs

Autistic Self Advocacy Network

Autistic Self Advocacy Network

Deaf Equality

National Association of Councils on Developmental Disabilities