REPORT OF THE VIRGINIA DEPARMENT OF
HOUSING AND COMMUNITY DEVELOPMENT

Commonwealth Digital Affordability and Cost Effectiveness Plan (Chapter 519, 2022)

TO THE GOVERNOR AND
THE GENERAL ASSEMBLY OF VIRGINIA

SENATE DOCUMENT NO. 9

COMMONWEALTH OF VIRGINIA
RICHMOND
2022

Commonwealth Digital Affordability and Cost Effectiveness Plan

Department of Housing and Community Development
Office of Broadband

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Glenn Youngkin
Governor

Caren Merrick
Secretary of
Commerce and Trade

Bryan W. Horn
Director

COMMONWEALTH of VIRGINIA

DEPARTMENT OF
HOUSING AND COMMUNITY DEVELOPMENT

Executive Summary

This document is the Commonwealth's Digital Affordability and Cost Effectiveness Plan[1]. This Plan was developed by the Department of Housing and Community Development (DHCD) and will be used by DHCD to access funds for broadband access, affordability, and adoption under the Infrastructure Investment and Jobs Act (IIJA). Specifically, this Plan includes:

- A summary of existing options for affordable broadband in the Commonwealth;
- An overview of the Affordable Connectivity Program (ACP) – the $30/month subsidy for broadband services - at the federal level and it's progress in Virginia;
- Examples of successful affordability programs and initiatives; and,
- Recommendations to address the affordability of broadband services.

Findings

DHCD identified several key takeaways in the course of developing this Plan:

1. Enrollment in the ACP in Virginia is at 27%, which is lower than the national average and several neighboring states. In total, qualifying Virginia households are missing out on over $24.5 million monthly through this program.
2. ACP enrollment varies widely by locality across the Commonwealth, with urban localities significantly outperforming rural areas. Regional disparities in Virginia demonstrate the need for a targeted approach to boost enrollment.
3. Virginia's largest broadband providers offer a low-cost service option, many small-to-mid size providers do not offer these affordable service options fully coverable by ACP.

Recommendations

The following recommendations address how the Commonwealth can proceed to tackle the issue of broadband affordability.

1. This Plan will lead into DHCD's development of the Commonwealth Digital Opportunity Plan that will study and develop solutions for gaps in broadband affordability and adoption.
2. Direct DHCD to implement an ACP outreach strategy via a Federal Communications Commission Outreach Grant application and partnerships with outside entities.

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[1] This Plan was formed pursuant to Chapters 518 and 519, passed in the 2022 General Assembly Session I

<u>Legislative History</u>

The General Assembly directed the Department to develop a plan to address the affordability of broadband in the Commonwealth. Through legislation, the Department was directed to apply for a planning grant from the National Telecommunications and Information Administration (NTIA) to access funding under the federal Infrastructure Investment and Jobs Act. The General Assembly directed the Department to include the following elements in the Commonwealth Digital Affordability and Cost Effectiveness Plan:

I. An overview of options for affordable broadband connectivity in the Commonwealth;
II. Recommendations on how best to leverage federal grants addressing broadband affordability;
III. Best practices for establishing a broadband affordability program, taking into account existing federal funds and programs;
IV. Recommendations for public outreach, with consideration of the report submitted by the Department of Social Services

<u>Acknowledgements</u>

In order to study this issue, the Department solicited feedback from various stakeholders, including representatives from industry and their associations, and representatives from local governments across the Commonwealth. The Department acknowledges and appreciates the contributions of stakeholders to this Plan.

Currently Available Affordable Broadband Options

<u>Internet Service Provider Programs</u>

There are a number of existing affordable internet service plans offered by internet service providers (ISPs) in the Commonwealth. The service areas in which these programs are available cover a significant segment of the low-to-moderate income population in Virginia. The following are examples of the qualified-offer plans made available by ISPs in Virginia:

Charter Communications Spectrum Internet Assist: A low cost internet plan for recipients of some assistance programs, including the National School Lunch Program (NSLP), the Community Eligibility Provision of the NSLP, or Supplemental Security Income (SSI) for applicants age 65+. The program offers a 30mbps plan with no data caps or contracts available. With the ACP subsidy this plan is free to the consumer.

Comcast Xfinity Internet Essentials & Internet Essentials Plus: Low-cost internet plans for individuals or families participating in government assistance programs such as the NSLP, housing assistance, Medicaid, SNAP, SSI, Federal Pell Grant, and others. The Internet Essentials baseline plan provides 50 Mbps/10 Mbps broadband for $9.95/month, with free equipment and without an annual commitment requirement. Internet Essentials Plus provides 100 Mbps/10 Mbps broadband for $29.95/month, still without activation fees or equipment rental fees. With the ACP benefit, this plan is free to the consumer.

Cox Connect2Compete and ConnectAssist: A low-cost internet plan for families with K-12 students. The qualified offer plan is $9.95/month, and includes a Wi-Fi modem capable of connecting up to 5 devices at once. This offer is restricted to families participating in a government assistance program with at least one K-12 student. Cox ConnectAssist is a $30/month plan with up to 100mbps download, free Wi-Fi modem rental, and no data cap for 12 months. Households that participate in an income-based government assistance program are eligible for ConnectAssist.

T-Mobile Project 10Million: Provides mobile hotspots with 100GB of free data to National School Lunch Program eligible students. The program is administered through schools, who distribute hotspot devices to eligible students. Schools or households can also purchase devices at-cost from T-Mobile.

Verizon FiOS Forward: FiOS Forward offers a free FiOS plan for Affordable Connectivity Program beneficiaries. Verizon offers a combination of a discount on Verizon FiOS with the ACP discount to offer free 300mbps/300mbps FiOS fiber internet service.

<u>Government-Led Efforts</u>

There are currently two broadband subsidy programs at the federal level, the Affordable Connectivity Program (ACP) and Lifeline.

Affordable Connectivity Program

About the ACP

The primary broadband affordability initiative at the federal level is the Affordable Connectivity Program (ACP), a $14 billion program that provides a discount on internet service to eligible households. The ACP replaced the COVID-19 Emergency Broadband Benefit Program in December, 2021. ACP-eligible households can receive a discount up to $30/month, or $70/month on Tribal lands, towards the internet service package of their choice.

Eligibility

ACP eligibility is determined by a variety of factors, including household income, and participation in certain government assistance programs. For applicants who reside on qualifying Tribal lands, household income and participation in Tribal assistance programs qualify households for the $70 benefit. Additionally, qualification for the ACP can be achieved by any member of a household, including a child or dependent who meets the eligibility criteria. A complete description of eligibility criteria and the application process can be found on the Affordable Connectivity Program website.[2]

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[2] https://www.affordableconnectivity.gov

Lifeline Program

Lifeline is a federal program dedicated to making phone and internet service more affordable for low-income households. This benefit provides eligible consumers with a monthly discount of up to $9.25. Consumers living on Tribal lands are eligible for an enhanced discount of up to $34.25 per month.[3] Eligibility for Lifeline is determined by income and/or participation in government assistance programs. Households with income less than 135% of the Federal Poverty Guideline are eligible under the income provision. Recipients of the FCC's Lifeline benefit program are also automatically eligible for the ACP, and both benefits can be received simultaneously.

Additional Federal Initiatives

Participating Providers with Free-to-Consumer Plans

In May of 2022, at the request of the Biden-Harris administration, many ACP participating providers elected to offer $30/month high-speed internet plans without fees, data caps, or hidden additional costs.[4] This effectively provides a no-cost internet service option to ACP-eligible households in the service areas of participating providers, should recipients elect to subscribe to it. The ACP benefit can also be used to subsidize the cost of a more expensive plan should recipients identify a service plan that better fits their needs. The following are some ACP-participating ISPs in Virginia that provide a no-cost to customer option equal to or less than $30/month.

- Comcast
- Cox Communications
- Spectrum (Charter Communications)
- Verizon
- ZiTel
- Brightspeed

There are currently 90 internet service providers in the Commonwealth that participate in the Affordable Connectivity Plan. A full list of participating providers can be found in the appendices under Appendix B.

Affordable Connectivity Program Analysis

<u>National Context</u>

Program Details

The ACP was officially launched by the FCC in December, 2021 to replace the Emergency Broadband Benefit established under COVID relief legislation. Enacted under the Infrastructure

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[3] https://www.lifelinesupport.org/get-started/
[4] https://www.whitehouse.gov/briefing-room/statements-releases/2022/05/09/fact-sheet-president-biden-and-vice-president-harris-reduce-high-speed-internet-costs-for-millions-of-americans/#:~:text=To%20make%20the%20most%20of,no%20more%20than%20%2430%2Fmonth.

Investment and Jobs Act (IIJA), the ACP has a $14.2 billion fund. Funds are distributed directly from the Universal Service Administrative Company, (USAC) the administering body of the Program under the direction of the FCC), to participating service providers to reimburse them for credits received by eligible users.

ACP Utilization Analysis

As of November, there are nearly 15 million households enrolled in the ACP.[5] Unfortunately, there are no official figures on the number of eligible households in the US. Given both the range of eligibility criteria and the various ways households can qualify for the Program, estimates of ACP eligible households vary. Expert[6] estimates put the number of eligible households in the U.S. at around 48 million, or roughly 40% of all households in the nation. This means that approximately 30% of estimated eligible households have enrolled in the Program.

Concerns Regarding the ACP

There are three primary concerns with respect to the Program's effectiveness nationally and in Virginia: outreach, use of benefits for broadband, and the longevity of the program.

1. ACP Outreach: Enrollment rates remain relatively low nationally, with less than a third of estimated eligible households enrolled in the program. To this end, the FCC has made available grants for outreach efforts at the state and local level.
2. Service Type: USAC data on enrolled ACP subscribers by service type shows that 60.4% of enrolled households use their benefit for mobile cellphone service as opposed to fixed broadband.[7] While still a net positive, internet via cellular service is not as stable or effective a solution for addressing the digital divide as broadband. The share of lower income Americans for whom a smartphone is the only method of getting online has more than doubled since 2013.[8]
3. Long-term Viability: The ACP's $14.2 billion fund is depleting by more than $350 million each month, an amount that increases as households sign up for the program. At its current growth rate and absent Congressional action, the fund will be depleted sometime in 2025.[9]

Program Sustainability

Congressional action will be required to supplement, replenish, or make permanent the ACP's $14.2 billion fund. If or when the fund is exhausted, beneficiaries will see their monthly internet bills increase by $30 (or $70 for Tribal enrollees), which may result in some participating

[5] https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/
[6] https://www.whitehouse.gov/briefing-room/statements-releases/2022/07/21/fact-sheet-vice-president-harris-highlights-milestone-of-1-million-new-participants-on-reducing-high-speed-internet-cost-for-americans/
[7] https://www.usac.org/about/affordable-connectivity-program/acp-enrollment-and-claims-tracker/additional-acp-data/
[8] https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/
[9] https://muninetworks.org/content/fate-affordable-connectivity-program

households canceling their internet or mobile phone service. Projections of possible ACP depletion scenarios estimate that the program's fund will be fully depleted sometime between March 2024 and February 2025, depending on enrollment growth rate.[10]

<u>ACP Utilization in Virginia</u>

Overview

While there are not official figures on the number of ACP eligible households by state or nationally, the Department estimates that Virginia's total number of eligible households is in the range of 1.047 to 1.1 million households. Virginia's estimated ACP enrollment rate among eligible households (using the larger of the two estimates) is 27%, below the national average.

Potential Benefits of Maximum Utilization

As of November 2022, 282,193 households in Virginia have enrolled in the ACP, meaning Virginians are receiving at least $8.45 million in subsidies monthly towards the cost of their broadband services, not factoring for possible $70 monthly benefits for Tribal beneficiaries. However, with up to 817,807 Virginia households not enrolled, Virginia is missing out on over $24.5 million per month in federal subsidy funds.

Regional Disparities in Enrollment

ACP Enrollment % by Locality

Estimated percentage of each locality's ACP eligible households that have enrolled

Low — High

Map: Virginia DHCD Office of Broadband · Source: FCC; U.S. Census Bureau · Get the data · Created with Datawrapper

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[10]https://acpdashboard.com/
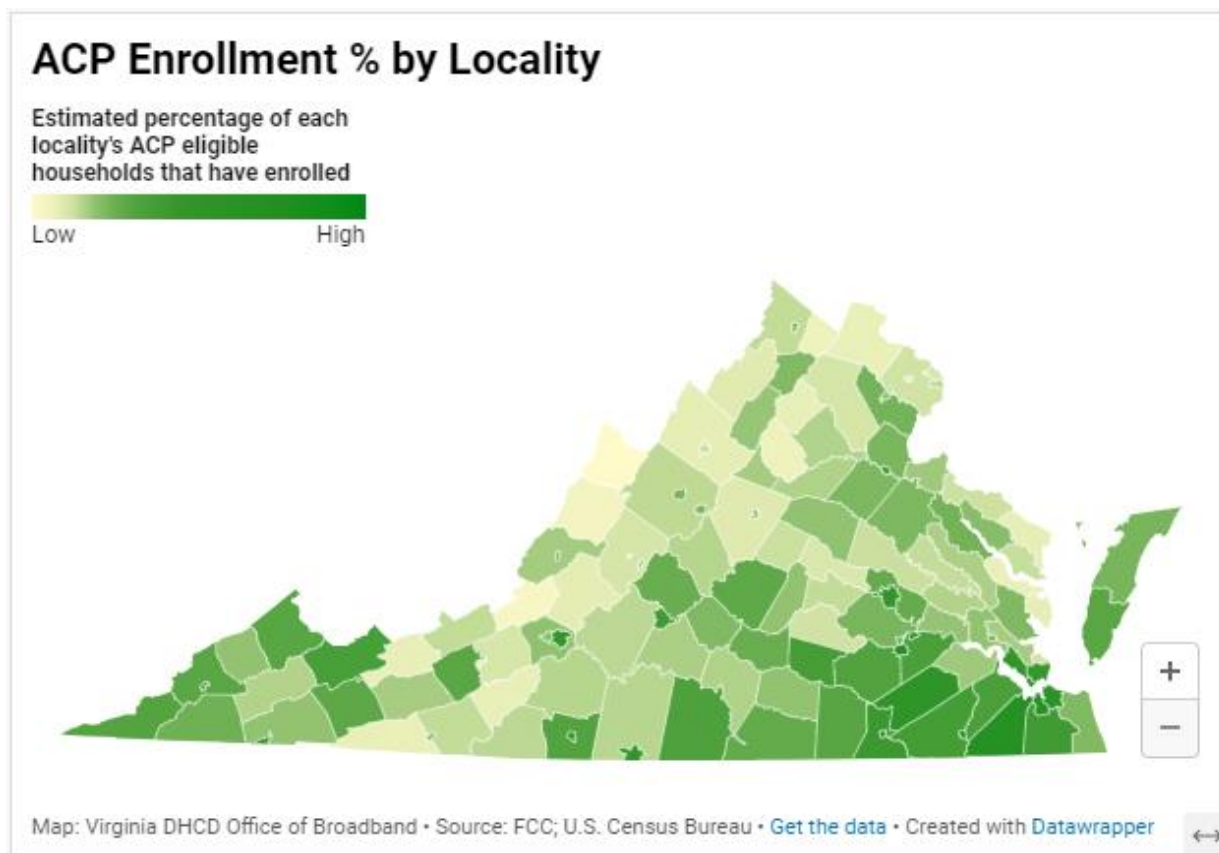
A locality-level analysis conducted by the Department revealed unequal rates of enrollment across the Commonwealth; ACP enrollment among eligible households appears to be significantly higher in urban areas, while rural areas generally lag in participation. The results of this analysis, including estimated enrollment rates by locality, can be found in the appendices under Appendix C. The above map visualizes the results of the Department's ACP locality eligibility estimates.

Regional Context

Compared to other Mid-Atlantic States, the Commonwealth of Virginia is in the middle of the pack with respect to ACP enrollment figures. The table below shows estimated enrollment rates as of November for neighboring states and the District of Columbia. North Carolina, Kentucky, and the District of Columbia are all outpacing Virginia with estimated enrollment rates that exceed the national average.

State/District	Estimated Enrollment
Washington, District of Columbia	43.08%
Kentucky	37.21%
North Carolina	36.20%
National Average	**30%**
Virginia	27%
Tennessee	26.34%
Maryland	24.13%
West Virginia	23.15%

Leveraging Federal Funds to Address Broadband Affordability

State/Local Broadband Affordability Best Practices

CARES Act

In 2020, the Commonwealth of Virginia allocated $30 million in CARES Act funding for broadband projects. Two projects located in the Cities of Hopewell and Portsmouth focused on addressing affordability.

1. **City of Portsmouth:** The City of Portsmouth in partnership with the Portsmouth Broadband Authority was awarded $750,000 in grant funding to construct a wireless mesh network for 1,065 public housing units. The project included several additional public Wi-Fi hotspots and a total of 173 access points.
2. **City of Hopewell:** The City of Hopewell in partnership with TPx Communications was awarded $3.95 million to construct a free public Wi-Fi network for 747 subsidized and

affordable housing units. The project included 8 miles of fiber with 250 access points throughout the city.

Broadband Affordability Offices

The County of Albemarle's Broadband Accessibility and Affordability Office (BAAO) is unique in the Commonwealth, and exemplifies a potential route of incorporating affordability into the prerogatives of a broadband office. Albemarle's BAAO "seeks to ensure that Albemarle County residents of all means have access to adequate and affordable broadband service."[11] The Office has pioneered two affordability programs within the County using local funds:

1. **Comcast Internet Essentials Partnership Program:** A partnership with Comcast allows Albemarle County to provide a no-cost broadband service to eligible residents in the ISP's service area. Comcast provides their existing Internet Essentials plan while Albemarle County covers the difference for the household. Program-eligible populations include households with a social service beneficiary, students eligible for the National School Lunch Program, and college students receiving a Pell grant.
2. **Affordable Connectivity Program Bridge:** The County's ACP Bridge program provides an additional $20/month supplement to the ACP benefit, covering some or all of the cost of monthly charges beyond the ACP's $30/month. With this additional benefit, eligible households in Albemarle may receive no-cost service, while others may be able to upgrade to more expensive plans that better suit their needs.

Commonwealth's VATI Investments Impact on Affordability

The Department of Housing and Community Development's Virginia Telecommunication Initiative (VATI) has been a force in impacting broadband affordability in the Commonwealth. An analysis from highspeedinternet.com found the Commonwealth has the 5th highest cost per Megabits per second at introductory internet service package levels. VATI projects awarded in the FY2022 round alone would rank 3rd lowest cost per Megabit per second among all states. The lowest cost plans among VATI projects on average provide service for $1.10 per megabit per second (Mbps), $5.64 cheaper than what the estimated average cost of internet in the Commonwealth was in 2020.[12]

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[11] https://www.albemarle.org/government/county-executive/broadband-accessibility-and-affordability-office
[12] https://www.highspeedinternet.com/resources/state-cost-of-internet

Recommendations for Establishing a Broadband Affordability Program

<u>Recommendation 1: Develop comprehensive strategic plan for utilizing funds for broadband access, affordability and adoption programs from the Infrastructure Investment and Jobs Act</u>

The Commonwealth is committed to ensuring that every Virginian has access to affordable, reliable, high speed internet. As the designated administering entity for the Digital Equity Act and the Broadband Equity, Access and Deployment (BEAD) programs established by the Infrastructure Investment and Jobs Act, DHCD shall leverage the State Digital Equity planning grants funds awarded to the Commonwealth on October 1, 2022 by NTIA to develop the Commonwealth's Digital Opportunity Plan. The plan will include a detailed assessment of access, affordability, and adoption of broadband and provide findings and recommendations to the Broadband Advisory Council on utilizing the forthcoming BEAD funding to address affordability, as well as adoption.[13]

<u>Recommendation 2: Implement Statewide ACP Outreach Strategy</u>

Direct the Department to apply for the Federal Communications Commission's Affordable Connectivity Program (ACP) Outreach Grant and implement a statewide ACP outreach program in partnership with outside entities. These grant funds will be used to conduct ACP outreach in communities across the Commonwealth, with the ultimate goal of increasing enrollment in the program while funds are available.

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[13] Per the Digital Equity Act Planning Grant Notice of Funding Opportunity (NOFO), it is required that eligible entities examine affordability and adoption as an element of the development of a statewide plan, which is available at https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/DE%20PLANNING%20GRANT%20NOFO.pdf

Appendices

Appendix A: Bill Text

VIRGINIA ACTS OF ASSEMBLY -- 2022 SESSION CHAPTER

An Act to direct the Department of Housing and Community Development to develop a plan to address broadband affordability.

[H 1265] Approved April 11, 2022

Be it enacted by the General Assembly of Virginia: 1. § 1. The Department of Housing and Community Development (the Department) shall develop a plan, to be known as the Commonwealth Digital Affordability and Cost Effectiveness Plan (the Plan), to access federal funding under the federal Infrastructure Investment and Jobs Act (P.L. 117-58). In order to achieve this goal, the Department shall apply for funding through a planning grant from the National Telecommunications and Information Administration. The Plan shall include (i) an overview of options for affordable broadband connectivity in the Commonwealth; (ii) recommendations on how best to leverage federal grants addressing broadband affordability; (iii) best practices for establishing a broadband affordability program, taking into account existing federal funds and programs; and (iv) recommendations for public outreach, with

consideration of the report submitted by the Department of Social Services as required in Item 359 L of Chapter 552 of the Acts of Assembly of 2021, Special Session I. The Department shall report the Plan to the Governor and the General Assembly by December 1, 2022.

Appendix B: List of Affordable Connectivity Program (ACP) Participating Providers in Virginia

Broadband Provider Name	Service Type	Offering Connected Devices (Laptop, Desktop, or Tablet)
Access Wireless	Mobile	
AirVoice Wireless	Mobile	✓
American Broadband and Telecommunications Company	Mobile	✓
All Points Broadband	Fixed	
Assurance Wireless	Mobile	✓
AT&T	Mobile	
B2X Online	Fixed	
BARC Connects	Fixed	
Breezeline	Fixed	
Bloosurf	Fixed	
Boost Mobile	Mobile	✓
Boss Wireless	Mobile	
BriscNet	Fixed	
Burke's Garden Telephone Co.	Fixed	
CenturyLink	Fixed	
Citizens Telephone Cooperative	Fixed	
Clear Wireless	Fixed/Mobile	✓
Comcast (Xfinity)	Fixed/Mobile	
Cox	Fixed	✓
Cricket Wireless	Mobile	
Culture Wireless	Fixed/Mobile	✓

Data Stream Broadband	Fixed	
Dailytel	Fixed/Mobile	✓
Declaration Networks (NeuBeam)	Fixed	✓
Earthlink	Fixed/Mobile	
Easy Wireless	Mobile	✓
Eastern Shore of Virginia Broadband Authority	Fixed	
EMPOWER Broadband	Fixed	
enTouch Wireless	Mobile	✓
Excess Telecom	Mobile	✓
Firefly Fiber Broadband	Fixed	
Foundation for California Community Colleges	Mobile	
GigaBeam Networks	Fixed	
good2go mobile	Mobile	
Go Technology Management	Mobile	
Hello Mobile Telecom	Mobile	
Hughes Network Systems	Fixed	
Hillcom	Fixed	
human-I-T	Mobile	✓
iGo Technology	Fixed	
Infiniti Mobile	Mobile	
Insight Mobile, Inc.	Mobile	✓
Inter Mountain Cable	Fixed	
K20 Wireless	Mobile	✓
KGI Communications	Fixed	

Kinex telecom	Fixed	
Life Wireless	Mobile	
Lingo	Fixed	
Lingo Networks	Fixed/Mobile	
Lumos Telephone	Fixed	
Maxsip Telecom	Fixed/Mobile	✓
Mediacom	Fixed	
Metro by T-Mobile	Mobile	
MGW Telephone Company	Fixed	
Nelson County Cablevision Corporation	Fixed	
New Hope Telephone Cooperative	Fixed	
Omnipoint Technology	Fixed/Mobile	✓
Open Broadband	Fixed	
Orange County Broadband Authority	Fixed	
PCs for People	Mobile	✓
Point Broadband	Fixed	
Q Link Wireless	Mobile	✓
RiverStreet Networks	Fixed	
Rural4G	Mobile	✓
RURALBAND	Fixed	
Astound Broadband powered by RCN	Fixed	
Sano Health	Mobile	
Scott County Telephone Cooperative	Fixed	
Selectel Wireless	Mobile	✓
Shentel, Glofiber, Beam Wireless	Fixed	
Spectrum (Charter)	Fixed	
StandUp Wireless	Mobile	✓
Starry	Fixed	
Suddenlink	Fixed	
SWA CONNECT	Fixed/Mobile	✓
TDS Telecommunications Corporation	Fixed	
Tone Communication Services	Fixed/Mobile	✓
Torch Wireless	Mobile	✓
Ting Internet	Fixed	✓
TracFone Wireless	Mobile	✓
TruConnect	Mobile	✓
Twigby	Mobile	✓
U2 CONNECT NOW	Fixed	
U.S. Cellular	Fixed/Mobile	
US Connect	Fixed/Mobile	✓
UVNV	Mobile	
Verizon	Fixed/Mobile	
Viasat	Fixed	
Zito West Holding	Fixed	

Appendix C: Virginia ACP Estimated Eligibility and Enrollment by Locality (As of September, 2022)

Geographic Area Name	Total Households	Number of Estimated Eligible Households*	Households (as of September, 2022)	Estimated Enrollment Rate
Accomack County, Virginia	13,641	7,216	1,689	23.4%
Albemarle County, Virginia	42,381	12,502	1,601	12.8%
Alleghany County, Virginia	6,529	3,369	587	17.4%
Amelia County, Virginia	5,034	1,938	314	16.2%
Amherst County, Virginia	12,161	5,448	1,149	21.1%
Appomattox County, Virginia	6,158	2,790	656	23.5%
Arlington County, Virginia	108,604	19,114	3,015	15.8%
Augusta County, Virginia	30,165	11,523	1,771	15.4%
Bath County, Virginia	1,831	818	64	7.8%
Bedford County, Virginia	31,424	11,344	2,004	17.7%
Bland County, Virginia	2,326	1,149	140	12.2%
Botetourt County, Virginia	13,171	4,057	468	11.5%
Brunswick County, Virginia	6,138	3,339	859	25.7%
Buchanan County, Virginia	8,270	5,450	1,445	26.5%
Buckingham County, Virginia	5,948	3,057	705	23.1%
Campbell County, Virginia	23,157	10,930	2,040	18.7%
Caroline County, Virginia	10,978	3,678	830	22.6%
Carroll County, Virginia	12,134	6,783	1,047	15.4%
Charles City County, Virginia	2,998	1,229	233	19.0%
Charlotte County, Virginia	4,836	2,708	498	18.4%
Chesterfield County, Virginia	127,230	33,207	7,586	22.8%
Clarke County, Virginia	5,690	1,644	148	9.0%
Craig County, Virginia	2,219	1,025	87	8.5%
Culpeper County, Virginia	17,474	5,050	951	18.8%
Cumberland County, Virginia	4,112	2,044	359	17.6%
Dickenson County, Virginia	5,727	3,952	832	21.1%
Dinwiddie County, Virginia	10,403	3,964	1,363	34.4%
Essex County, Virginia	4,551	2,244	761	33.9%
Fairfax County, Virginia	398,653	65,778	10,610	16.1%
Fauquier County, Virginia	24,617	4,850	688	14.2%
Floyd County, Virginia	6,657	3,222	379	11.8%
Fluvanna County, Virginia	9,967	2,900	446	15.4%
Franklin County, Virginia	22,730	10,069	1,559	15.5%
Frederick County, Virginia	32,094	8,794	1,366	15.5%
Giles County, Virginia	6,715	2,733	387	14.2%
Gloucester County, Virginia	14,792	4,763	1,117	23.5%
Goochland County, Virginia	8,711	1,951	260	13.3%
Grayson County, Virginia	6,388	3,846	462	12.0%
Greene County, Virginia	7,491	2,240	421	18.8%
Greensville County, Virginia	3,441	1,724	594	34.5%
Halifax County, Virginia	14,155	7,955	2,145	27.0%
Hanover County, Virginia	39,226	9,885	1,465	14.8%
Henrico County, Virginia	130,434	45,652	11,253	24.6%

Henry County, Virginia	21,012	12,775	3,344	26.2%
Highland County, Virginia	987	421	22	5.2%
Isle of Wight County, Virginia	14,611	4,792	1,643	34.3%
James City County, Virginia	29,681	7,865	1,796	22.8%
King and Queen County, Virginia	2,816	1,104	228	20.7%
King George County, Virginia	9,387	2,300	474	20.6%
King William County, Virginia	6,393	2,046	410	20.0%
Lancaster County, Virginia	5,287	2,321	390	16.8%
Lee County, Virginia	8,843	5,580	1,829	32.8%
Loudoun County, Virginia	132,565	16,305	2,116	13.0%
Louisa County, Virginia	14,383	5,221	865	16.6%
Lunenburg County, Virginia	4,472	2,384	459	19.3%
Madison County, Virginia	5,098	1,968	216	11.0%
Mathews County, Virginia	3,881	1,281	221	17.3%
Mecklenburg County, Virginia	12,371	6,148	1,521	24.7%
Middlesex County, Virginia	4,764	2,053	286	13.9%
Montgomery County, Virginia	35,388	15,111	1,961	13.0%
Nelson County, Virginia	6,398	2,508	381	15.2%
New Kent County, Virginia	8,117	1,851	377	20.4%
Northampton County, Virginia	5,151	2,570	670	26.1%
Northumberland County, Virginia	5,686	2,354	494	21.0%
Nottoway County, Virginia	5,568	2,784	766	27.5%
Orange County, Virginia	13,926	4,317	720	16.7%
Page County, Virginia	9,413	4,528	826	18.2%
Patrick County, Virginia	7,830	4,048	632	15.6%
Pittsylvania County, Virginia	26,205	13,234	2,752	20.8%
Powhatan County, Virginia	10,392	2,203	359	16.3%
Prince Edward County, Virginia	7,394	3,926	954	24.3%
Prince George County, Virginia	11,763	3,517	1,152	32.8%
Prince William County, Virginia	144,159	25,804	5,787	22.4%
Pulaski County, Virginia	14,666	6,512	1,587	24.4%
Rappahannock County, Virginia	2,827	803	94	11.7%
Richmond County, Virginia	2,939	1,320	396	30.0%
Roanoke County, Virginia	38,234	13,382	2,731	20.4%
Rockbridge County, Virginia	9,301	4,325	611	14.1%
Rockingham County, Virginia	31,306	11,959	1,483	12.4%
Russell County, Virginia	10,975	6,837	1,200	17.6%
Scott County, Virginia	8,710	5,130	1,163	22.7%
Shenandoah County, Virginia	17,541	7,841	1,044	13.3%
Smyth County, Virginia	12,694	7,591	1,872	24.7%
Southampton County, Virginia	6,618	2,760	895	32.4%
Spotsylvania County, Virginia	45,463	10,957	2,567	23.4%
Stafford County, Virginia	48,160	8,861	2,108	23.8%
Surry County, Virginia	2,794	1,238	274	22.1%
Sussex County, Virginia	3,792	1,797	749	41.7%
Tazewell County, Virginia	16,371	9,528	2,913	30.6%
Warren County, Virginia	14,641	4,919	1,047	21.3%

Washington County, Virginia	22,104	10,875	2,025	18.6%
Westmoreland County, Virginia	7,910	3,773	722	19.1%
Wise County, Virginia	14,916	8,636	2,235	25.9%
Wythe County, Virginia	12,393	6,023	998	16.6%
York County, Virginia	25,517	5,614	1,200	21.4%
Alexandria city, Virginia	71,289	15,113	3,155	20.9%
Bristol city, Virginia	7,482	4,355	1,829	42.0%
Buena Vista city, Virginia	2,509	1,598	290	18.1%
Charlottesville city, Virginia	18,814	8,146	1,467	18.0%
Chesapeake city, Virginia	86,524	24,313	8,747	36.0%
Colonial Heights city, Virginia	7,094	2,965	870	29.3%
Covington city, Virginia	2,382	1,398	311	22.2%
Danville city, Virginia	18,266	11,635	4,607	39.6%
Emporia city, Virginia	2,076	1,451	692	47.7%
Fairfax city, Virginia	8,751	1,995	267	13.4%
Falls Church city, Virginia	5,631	636	90	14.1%
Franklin city, Virginia	3,516	1,779	1,301	73.1%
Fredericksburg city, Virginia	11,059	3,760	1,552	41.3%
Galax city, Virginia	2,614	1,741	386	22.2%
Hampton city, Virginia	54,847	23,858	9,347	39.2%
Harrisonburg city, Virginia	16,751	8,577	1,189	13.9%
Hopewell city, Virginia	9,362	5,261	2,441	46.4%
Lexington city, Virginia	2,066	1,027	97	9.4%
Lynchburg city, Virginia	28,223	14,337	4,458	31.1%
Manassas city, Virginia	13,066	3,397	717	21.1%
Manassas Park city, Virginia	4,596	924	205	22.2%
Martinsville city, Virginia	5,597	3,666	1,465	40.0%
Newport News city, Virginia	70,376	32,162	13,346	41.5%
Norfolk city, Virginia	89,398	41,838	19,464	46.5%
Norton city, Virginia	1,877	1,246	375	30.1%
Petersburg city, Virginia	13,231	7,952	4,777	60.1%
Poquoson city, Virginia	4,632	1,047	161	15.4%
Portsmouth city, Virginia	36,650	17,335	9,443	54.5%
Radford city, Virginia	5,677	3,452	426	12.3%
Richmond city, Virginia	91,005	44,592	17,610	39.5%
Roanoke city, Virginia	41,694	22,765	8,954	39.3%
Salem city, Virginia	9,876	3,743	763	20.4%
Staunton city, Virginia	10,638	5,053	1,071	21.2%
Suffolk city, Virginia	34,603	10,865	5,946	54.7%
Virginia Beach city, Virginia	172,452	49,666	11,741	23.6%
Waynesboro city, Virginia	9,169	5,135	1,062	20.7%
Williamsburg city, Virginia	4,485	1,834	547	29.8%
Winchester city, Virginia	10,669	4,449	946	21.3%
Virginia Total (Locality Enrollment, Updated Quarterly)	3,184,121	1,047,005	272,034	26.0%
Virginia Total (Statewide Enrollment, Updated Weekly)	3,184,121	1,047,005	282,193	27.0%

*Estimates may overstate or understate eligibility in a given locality