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Digital Inclusion GUIDE for STATES

How to Prepare for Success in
Your State Digital Equity Planning

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DIGITAL INCLUSION GUIDE FOR STATES

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INTRODUCTION

To achieve digital equity, deploying broadband to every household in the United States—even if it is scalable, future-proof technologies—will not be enough, and neither will a federal subsidy designed to make the internet more affordable for low-income households. Robust, comprehensive programs that address the human side of the issue, in addition to the technical, must be designed and implemented across the country to create systems that work for everyone, where every person has access to the technologies, skills, and opportunities necessary to thrive.

Achieving **digital equity** in the United States would mean that all the nation's individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy. Digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services.

Congress recently allocated the largest investment in digital equity and broadband in US history—\$65 billion—through the [Infrastructure Investment and Jobs Act](#) (IIJA). If implemented with the understanding that digital equity is a long term challenge, this investment could result in the development and implementation of systemic solutions.

The bulk of the IIJA broadband funds—including those allocated through the [Digital Equity Act](#) (DEA), rightly identify states as key actors in closing the digital divide. As such, state governments will manage much of the funding allocated through the IIJA in addition to the funds states were allocated in the various COVID recovery acts. States are in a unique position to lead cross-sector, cross-departmental, multifaceted digital inclusion activities that drive impact across their state. A state's knowledge, coordination, and convening abilities and expertise, combined with its relationships with local governments and residents, make it a logical leader in promoting and expanding digital equity.

Today, most states, the District of Columbia and territories have a dedicated broadband office and are leading efforts to increase broadband access throughout their state, but few have had the resources, capacity, or political support to develop a robust digital equity strategy. However, broadband access and digital inclusion are inextricably linked and mutually reinforcing. Thus, state broadband offices are natural homes for state-led digital inclusion work.

The opportunity the IIJA provides to states is the chance to step back and thoughtfully design a statewide digital equity strategy to holistically meet the unique needs of each state's residents, leverage the state's assets, and identify innovative and creative solutions to achieve digital equity within the state.

However, states are also currently managing and disbursing their own state allocated funds and federal funds from several different grant programs like the Capital Project Funds (CPF),

State and Local Fiscal Recovery Funds (SLFRF), and the Broadband Equity, Access, and Deployment (BEAD) program funds to increase broadband access throughout their states. In many states, the broadband offices are newly established and understaffed. For many of the newly established broadband programs, timelines and requirements differ and in some cases, like the DEA, guidelines have not yet been released.¹

With this special confluence of factors in mind, National Digital Inclusion Alliance (NDIA) offers this guide to states as a tool to prepare for the forthcoming planning opportunity the DEA provides. Think of this as a pre-planning guide to help make the most of the planning funds when the state receives them.

The guide includes the basics about digital inclusion, an overview of the DEA—what to expect and our best estimation of a timeline, recommendations for preparing for the planning requirements, recommendations for weaving digital equity throughout all state-led broadband activities, and ideas and best practices from other states with digital inclusion activities underway or in process. Where possible, templates and tools are included to simplify the pre-planning process for states.

While much is still unknown, states can undertake simple, tactical steps now to prepare for the forthcoming planning and eventual implementation of digital equity strategies. Our hope is this guide will provide practical support to states as they begin that process, and over the coming months and years, NDIA will continue to provide more support and resources for states as they work toward achieving digital equity.

¹As of the publication of this guide, official guidance from the National Telecommunications and Information Administration (NTIA), who will administer the DEA funds, has not been released for states who seek to apply for funds to develop and implement digital equity plans.

DIGITAL INCLUSION 101

Since its inception, the internet has had the capacity to be the great equalizer of our time. Thanks to the internet, in no other time in history has it been easier to start a business from home, communicate with loved ones across oceans and time zones, work and learn remotely, receive healthcare services even if you live hours from a medical provider, and engage in any other of the thousands of opportunities the internet brings into a person's home. And yet, too many US residents continue to be disconnected from the internet and the opportunities it provides access to, and arguably has accentuated disparities where they exist.

The COVID-19 pandemic crystallized the consequences of how disconnection negatively impacts individuals' lives. Reliable, affordable internet is no longer a luxury but a right. Despite **broadband** connectivity being a prerequisite for full participation in modern society, persistent disparities exist in the United States in terms of who has reliable and affordable broadband access, how they access it, and their abilities to benefit from it. When thinking about broadband access, there are two distinct elements to consider:

- **Broadband availability** - Broadband availability refers to the ability for a household(s) to subscribe to a broadband service at a speed, quality, and capacity needed to accomplish common online tasks.
- **Broadband adoption** - Broadband adoption refers to a household's (1) active subscription to a broadband service at a speed, quality, and capacity needed to accomplish common and critical online tasks (2) possession of the digital skills necessary to accomplish such tasks and (3) ability to do so on a personal device and secure convenient network.²

The groups most affected by the **digital divide** are many of the same that were most severely impacted by the pandemic, and that have consistently experienced social inequities over time. According to the American Community Survey (ACS), 14.5 million households—12 percent of all households in the country—had internet access only through a cellular data plan, and 16.7 million households (14 percent) had no home broadband subscriptions of any kind in 2019, including a cellular data plan.³ However, low-income households, older adults, and certain racial and ethnic groups lack broadband and computer access at higher rates than the general population.

Among low-income households (making less than \$35,000 per year), 30 percent lack a home internet subscription.⁴ Among persons 65 years of age and older, 22 percent lack broadband or a computer in their household.⁵

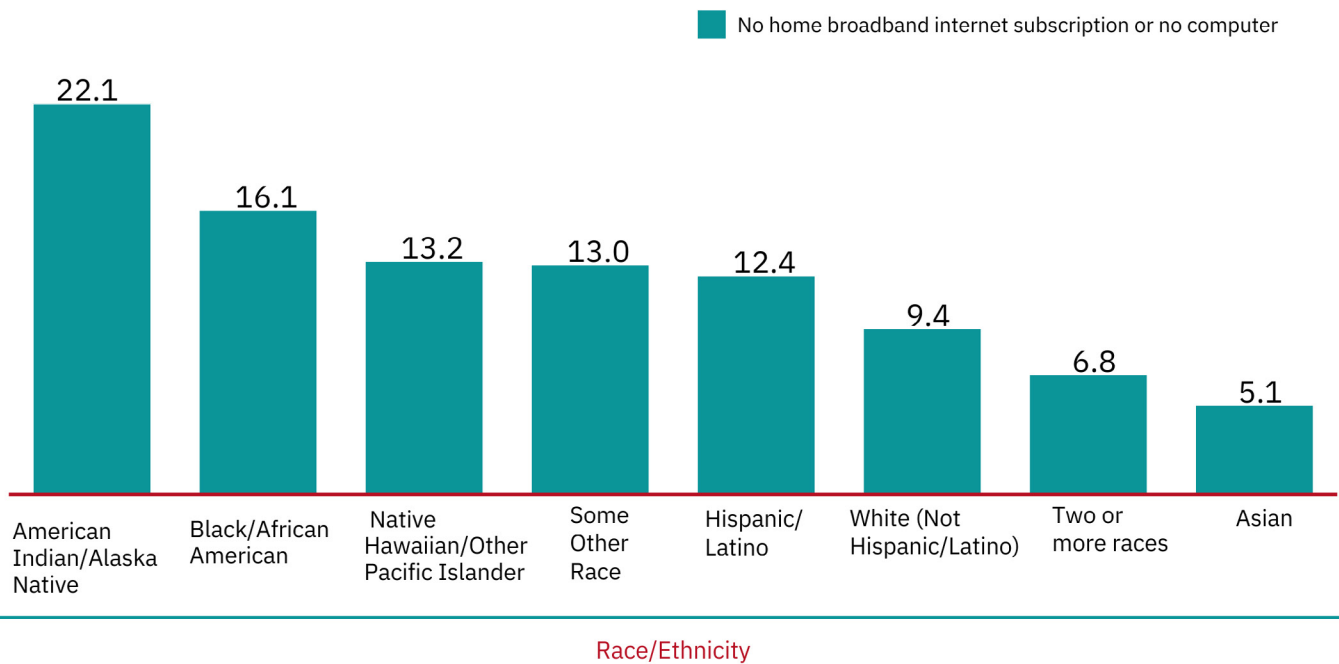
² Rhinesmith, Colin. "Digital Inclusion and Meaningful Broadband Adoption Initiatives." Evanston, IL: Benton Foundation, January 2016. <https://www.benton.org/publications/digital-inclusion-and-meaningful-broadband-adoption-initiatives>

³ 1-Year American Community Survey. (2019). Presence and Types of Internet Subscriptions in Household [Table B28002]. U.S. Census Bureau. <https://data.census.gov>.

⁴ 1-Year American Community Survey. (2019). Household Income in the Last 12 Months (In 2020 Inflation-Adjusted Dollars) by Presence and Type of Internet Subscription in Household [Table B28004]. U.S. Census Bureau. <https://data.census.gov>.

⁵ 1-Year American Community Survey. (2019). Age by Presence and Type of Internet Subscription in Household [Table B28005]. U.S. Census Bureau. <https://data.census.gov>.

Figure 1: Broadband and Computer Access by Race and Ethnicity (2019) % households ⁶



Efforts to bridge the digital divide and work toward **digital equity** began in the early- to mid-1990s, primarily as grassroots efforts focused on improving digital skills through class training and public computer labs. In the 2000s community-based organizations and anchor institutions began investing in and creating what are now called **digital inclusion** programs, focused on addressing one or more of the five elements of digital inclusion:

1. Affordable, robust broadband internet service
2. Internet-enabled devices that meet the needs of the user
3. Access to digital literacy training
4. Quality technical support
5. Applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration

DEFINITION

Digital Equity

is a condition in which all individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy. Digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services.

⁶ 1-Year American Community Survey. (2019). Presence of a Computer and Type of Internet Subscription in Household by race and ethnicity [Tables B28009A-H]. U.S. Census Bureau. <https://data.census.gov>.

Digital Inclusion

DEFINITION

refers to the activities necessary to ensure that all individuals and communities, including the most disadvantaged, have access to and use of Information and Communication Technologies (ICTs). This includes five elements:

1. Affordable, robust broadband internet service;
2. Internet-enabled devices that meet the needs of the user;
3. Access to digital literacy training;
4. Quality technical support; and
5. Applications and online content designed to enable and encourage self-sufficiency, participation and collaboration.

Digital Inclusion must evolve as technology advances. Digital Inclusion requires intentional strategies and investments to reduce and eliminate historical, institutional, and structural barriers to access and use technology.

Figure 2



12% of all households had a cellular data plan only



16.7 million households (14%) had no home broadband subscription

At its core, digital inclusion work requires trust to succeed. The community members who would benefit most from support services often experience disenfranchisement and have seen their communities and neighbors overlooked by institutions. An inherent distrust of technology, borne from a lack of confidence or past negative experiences, can also make people hesitant to engage with online resources. And logistically, those lacking broadband access are inherently harder to reach as outreach tools are increasingly digital.

For these reasons and more, trusted community-based organizations are fundamental to developing impactful digital inclusion programs. They are known entities with existing relationships and a history of providing services to the community, and digital inclusion programs are often a logical extension of their work. The types of organizations that develop digital inclusion programs can vary greatly depending on the character and needs of the community, but some of the most common include libraries, public housing authorities, local governments, senior centers, schools and academic institutions, faith-based organizations, and social service organizations.

As the importance of digital inclusion work has gained awareness (and funding), and as more organizations establish digital inclusion programs and services, the need for collaboration at the local and state levels has become apparent. The first community-wide digital inclusion coalitions formed about 10 years ago in Philadelphia, Kansas City, and Portland, followed by a few others shortly thereafter. In these communities, and in many more since, anchor institutions,

direct service providers, local governments, and other key partners recognized a growing but disconnected network of organizations and programs working to meet the digital inclusion needs of underserved residents. With a goal of coordinating efforts and forming a more complete **digital inclusion ecosystem**, they began convening and eventually formalized as digital inclusion coalitions.

The coalition model has proven to be a particularly effective way to organize digital inclusion efforts across communities. Based on a recent survey NDIA conducted of the field, there are now more than 50 digital inclusion coalitions across the country. For more information on the strengths, organizing principles, and effective strategies for establishing and sustaining digital inclusion coalitions, refer to NDIA's [Digital Inclusion Coalition Guidebook](#).⁷

To date, limited government (federal, state, or local) funding has been available for digital inclusion specific work. The [Broadband Technology and Opportunities Program \(BTOP\)](#)⁸ established under the [American Rescue and Recovery Act \(ARRA\)](#)⁹ invested approximately \$4 billion in broadband adoption projects across the country. However, many of these projects closed shop once the funding sunsetted in 2015.

DEFINITION

Digital Inclusion Ecosystem

A digital inclusion ecosystem is a combination of programs and policies that meet a geographic community's unique and diverse needs. Coordinating entities work together in an ecosystem to address all aspects of the digital divide, including affordable broadband, devices, and skills.

Indicators of a strong digital inclusion ecosystem:

- Existence of programs and policies addressing all aspects of the digital divide
- Affordable and subsidized broadband service options that meet the community's needs
- Affordable and subsidized device ownership programs that meet the community's needs
- Multilingual digital literacy and digital skill trainings that meet the community's needs
- Hardware and software technical support
- Digital navigation services to guide residents to the above services
- Collaboration: Entities providing local digital inclusion services, policymakers, advocates, social service providers and community leaders co-create solutions in partnership with the community services.

⁷ <https://www.digitalinclusion.org/blog/2022/02/24/ndia-publishes-new-digital-inclusion-coalition-guidebook/>

⁸ <https://www.ntia.doc.gov/category/broadband-technology-opportunities-program>

⁹ <https://www.congress.gov/bill/111th-congress/house-bill/1/text>

In the absence of sustained federal funding, by 2019¹⁰ many states had stepped into the gap to support broadband deployment to rural areas, but digital inclusion activities remained largely unfunded.

Local governments, like the City of Seattle in 1996, began investing personnel and funds towards what was then called community technology programs. In the past decade, others, including Detroit, Louisville, and Portland began dedicating personnel to the issue to lead initiatives, coalitions, and interdepartmental work. Digital inclusion programs have generally relied on bootstrapped means of obtaining funding for their work. In spite of these and other impactful efforts in recent years, a 2021 study by the Pew Research Center found that, while some gains have been made, gaps in digital equity remain stubbornly persistent according to factors of income, race, age, and disability status.^{11,12,13,14} As such, the infusion of funds to the field through the various COVID relief acts, the IIJA, and the DEA specifically are welcome and necessary to create the systems necessary to achieve digital equity.

¹⁰ How States Are Expanding Broadband Access: New research identifies tactics for connecting unserved communities. (2020). The Pew Charitable Trusts. <https://www.pewtrusts.org/en/research-and-analysis/reports/2020/02/how-states-are-expanding-broadband-access>

¹¹ Vogels, E. Digital divide persists even as Americans with lower incomes make gains in tech adoption. (2021, June 22). Pew Research Center. <https://www.pewresearch.org/fact-tank/2021/06/22/digital-divide-persists-even-as-americans-with-lower-incomes-make-gains-in-tech-adoption/>.

¹² Atske, S. and Andrew Perrin. Home broadband adoption, computer ownership vary by race, ethnicity in the U.S. (2021, July 16). Pew Research Center. <https://www.pewresearch.org/fact-tank/2021/07/16/home-broadband-adoption-computer-ownership-vary-by-race-ethnicity-in-the-u-s/>.

¹³ Faverio, M. Share of those 65 and older who are tech users has grown in the past decade. (2022, January 13). Pew Research Center. <https://www.pewresearch.org/fact-tank/2022/01/13/share-of-those-65-and-older-who-are-tech-users-has-grown-in-the-past-decade/>.

¹⁴ Perrin, A. and Sara Atske. Americans with disabilities less likely than those without to own some digital devices. (2021, September 10). Pew Research Center. <https://www.pewresearch.org/fact-tank/2021/09/10/americans-with-disabilities-less-likely-than-those-without-to-own-some-digital-devices/>.

THE DIGITAL EQUITY ACT (DEA)

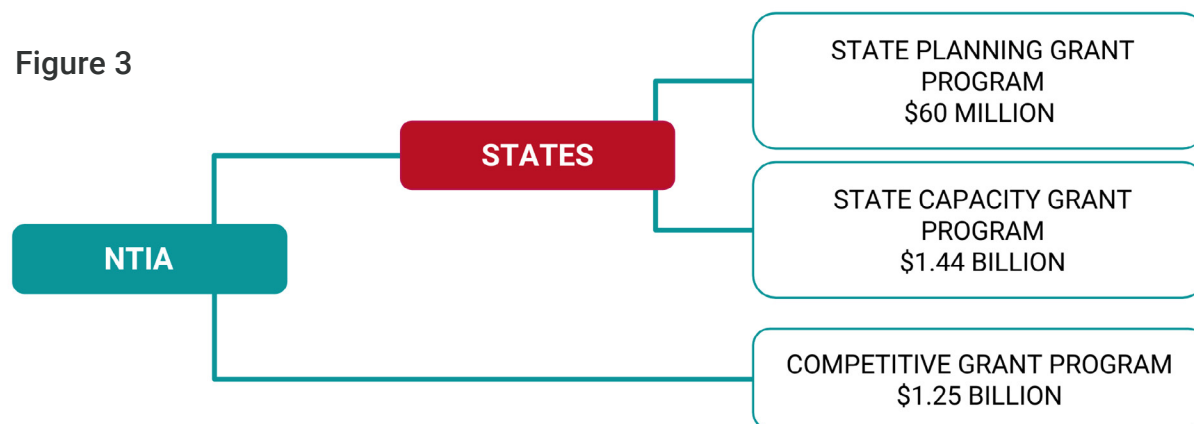
Background and Overview

The DEA provides a powerful opportunity to states to step back and thoughtfully design a statewide digital equity strategy to holistically meet the unique needs of state residents, leverage state assets, and identify innovative and creative solutions to achieve digital equity. First introduced by US Senator Patty Murray of the State of Washington in 2019, the DEA was reintroduced in 2021 with bi-partisan support from Senators Rob Portman of Ohio and Angus King of Maine. It was then included in the broadband section of the IIJA, allocated \$2.75 billion, and signed into law by President Joe Biden on November 15, 2021.

The DEA creates two programs (broken into three grants) housed at the NTIA—the **State Digital Equity Capacity Grant Program** and the **Digital Equity Competitive Grant Program**.

- **State Digital Equity Planning Grant Program:** \$60 million formula grant program for states and territories to develop digital equity plans
- **State Digital Equity Capacity Grant Program:** \$1.44 billion formula grant program for states and territories distributed via annual grant programs over five years to implement digital equity projects and support the implementation of digital equity plans
- **Digital Equity Competitive Grant Program:** \$1.25 billion discretionary grant program distributed via annual grant programs over five years to implement digital equity projects. Eligible applicants include specific types of political subdivision, agency, or instrumentality of a state; tribal governments; nonprofit entities; community anchor institutions; local educational agencies; and entities that carry out workforce development programs.

Figure 3



As outlined above, the State Digital Equity Capacity Grant Program contains two types of grants: (1) planning and (2) capacity. The planning grants provide funding for states to develop digital equity plans, which are required to be eligible for the capacity grants. Capacity grants are what they sound like—designed to provide states with the necessary support and capacity to fund the states’ digital inclusion priorities, strategies, and initiatives.

Building a statewide digital equity plan is similar to building a state broadband plan or a state economic development plan. The primary difference is a digital equity plan specifically and holistically addresses the digital divide and identifies strategies to close it. Yet, to date, no state has developed a statewide plan with a singular focus on achieving digital equity, with the exception of California whose “Broadband for All” plan interweaves broadband access and digital equity goals.¹⁵ While lessons and best practices can be drawn from communities across the country who have created local digital inclusion plans, local plans cannot fully inform states, given that states’ roles and responsibilities differ from that of local governments or community-based organizations.

Part of the beauty of the United States is the diversity of its states, which lends itself to each functioning as its own laboratory of democracy. Each state’s character and attributes differ, and the ways in which the digital divide manifests itself will reflect that diversity. In turn, each state’s goals and strategies for achieving digital equity will necessarily differ from the other. Missouri’s path to digital equity will be much different than Texas’s or even its neighbor, Kansas. As such, each state’s plan may be slightly or drastically different.

State Digital Equity Capacity Grant Program Basics

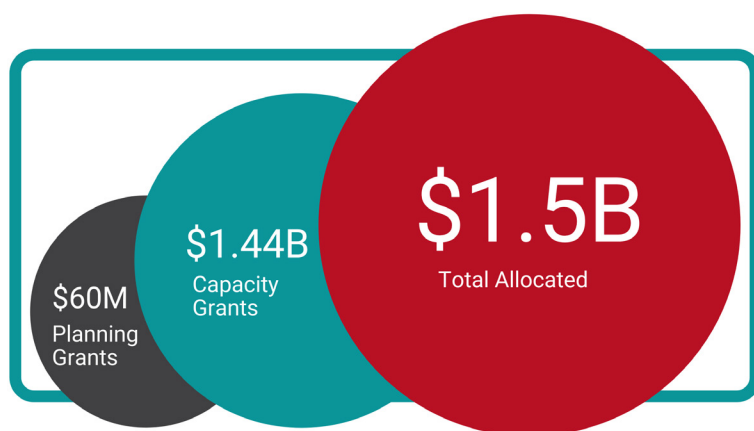
Figure 4

Total Allocated: \$1.5 billion (\$60 million planning grants + \$1.44 billion capacity grants)

Program Administrator: National Telecommunications and Information Administration (NTIA)

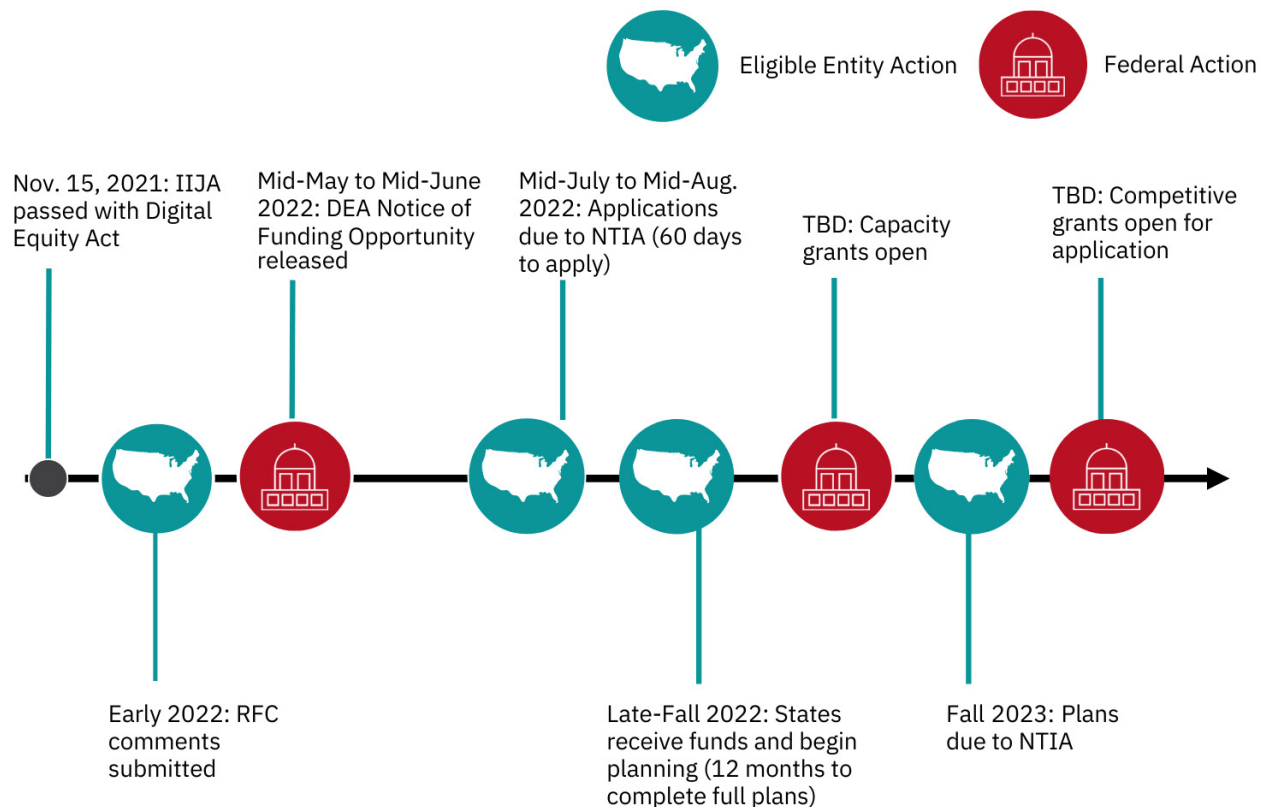
Timeline:

- November 15, 2021: IIJA passed with DEA
- February 2, 2022: Public Comment (RFC) Period Closed
- Mid-May to Mid-June 2022: DEA Notice of Funding Opportunity (NOFO) Released



¹⁵ <https://broadbandcouncil.ca.gov/wp-content/uploads/sites/68/2020/12/BB4All-Action-Plan-Final.pdf>

Figure 5: State Digital Equity Capacity Grant Program Timeline



- Fall 2022: Applications due to NTIA
- Fall 2022: States receive funds and begin planning (12 months to complete full plans)
- Fall 2023: Digital equity plans due to NTIA
- TBD: Request for Comments for State Digital Equity Capacity Grant Program and Digital Equity Competitive Grant Program
- TBD: State Digital Equity Capacity Grant Program NOFO
- TBD: Digital Equity Competitive Grant Program NOFO

Eligible Administering Entities:¹⁶

- The State, a political subdivision of the State, an Indian Tribe, a Native Hawaiian organization
- A foundation, corporation, institution, association, or coalition that is – (1) a nonprofit entity, (2) providing services in the State; and (3) not a school
- A community anchor institution, other than a school
- A local educational agency
- An entity that carries out a workforce development program
- An agency of the State that is responsible for administering or supervising adult education and literacy activities in the state
- A public or multi-family housing authority
- A partnership between any of the preceding entities

¹⁶ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(b)(2) (2021). <https://uscode.house.gov/view.xhtml?req=47+USC+1723&f=treesort&fq=true&num=13&hl=true&edition=prelim&granuleId=USC-prelim-title47-section1723>

Eligible Subgrantees:¹⁷

- A political subdivision, agency, or instrumentality of a State, including an agency of a State that is responsible for administering or supervising adult education and literacy activities, or for providing public housing, in the State
- An Indian Tribe, an Alaska Native entity, or a Native Hawaiian organization
- A foundation, corporation, institution, or association that is-
 - a nonprofit entity; and
 - not a school
- A community anchor institution
- A local educational agency
- An entity that carries out a workforce development program
- A partnership between any of the entities described in paragraphs (1) through (6)
- A partnership between-
 - an entity described in any of paragraphs (1) through (6); and
 - an entity that-
 - the Assistant Secretary, by rule, determines to be in the public interest; and
 - is not a school

Covered Populations:¹⁸

The DEA instructs states to understand the current state of the digital divide among key unserved or underserved populations and then to outline how the state will address those gaps with digital equity programming. The law defines the following as covered populations:

- Low-income households (less than or equal to 150% of federal poverty level)
- Aging individuals
- Incarcerated individuals (not in federal facilities)
- Veterans
- Individuals with disabilities
- Individuals with a language barrier (e.g. English learners, low levels of literacy)
- Racial or ethnic minorities
- Rural residents

Plan Requirements:¹⁹

- Identification of barriers to digital equity for covered populations
- Measurable objectives for documenting and promoting digital inclusion activities and metrics
- Assessment of how objectives will impact and interact with the state's other objectives (ie. economic development, health outcomes, etc.)
- Description of state's plan to collaborate with key stakeholders
- List of organizations state collaborated with on developing and implementing plan

¹⁷ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(d)(3)(D)(iii)(I) (2021). <https://uscode.house.gov/view.xhtml?req=47+USC+1723&f=treesort&fq=true&num=13&hl=true&edition=prelim&granuleid=USC-prelim-title47-section1723>

¹⁸ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1721(8) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1721%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1721\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1721%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1721)&f=treesort&edition=prelim&num=0&jumpTo=true)

¹⁹ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(c)(1) (2021). <https://uscode.house.gov/view.xhtml?req=47+USC+1723&f=treesort&fq=true&num=13&hl=true&edition=prelim&granuleid=USC-prelim-title47-section1723>

HOW TO PREPARE

Build State Digital Equity Capacity

Before you begin creating a state digital equity plan, the entity creating the plan should build state digital equity capacity to prepare. NDIA recommends state leaders consider the following as they build capacity:

1. The Digital Equity Office (DEO) should be housed in or co-located with the existing state broadband office, as digital inclusion is inextricably linked to broadband access and expansion efforts.
2. States should equip the DEO with staff and resources to lead digital inclusion activities.
3. States should equip the DEO with the authority to lead and coordinate interagency and statewide digital inclusion activities.

Identify a Lead, and Staff the Effort

The DEA requires governors (or an equivalent official) to select an “administering entity for the state” to be the primary planning grant recipient and administrator.²⁰ That entity will be responsible for developing, implementing, and overseeing the digital equity plan for the state.²¹ The administering entity can be a state agency or a variety of other entities including but not limited to a political subdivision, community anchor institution, or partnership between multiple organizations.

Functionally, the administering entity will become the de-facto home and lead for all state-led digital inclusion activities for the next five (or more) years. As such, it is imperative governors select the administering agency best suited to both create the digital equity plan and implement it.

While states have differing models for where to house digital inclusion efforts, we highly recommend that you centralize digital inclusion efforts within or adjacent to existing

²⁰ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(b)(1) (2021). <https://uscode.house.gov/view.xhtml?req=47+USC+1723&f=treesort&fq=true&num=13&hl=true&edition=prelim&granuleId=USC-prelim-title47-section1723>

²¹ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(b)(1)(B) (2021). <https://uscode.house.gov/view.xhtml?req=47+USC+1723&f=treesort&fq=true&num=13&hl=true&edition=prelim&granuleId=USC-prelim-title47-section1723>

broadband efforts. Such an approach makes it more likely that your state can develop and implement a streamlined, holistic, and efficient digital equity and inclusion strategy that bridges the gap between infrastructure, deployment, and adoption. Finally, the governor should duly empower the entity with the necessary planning, policymaking, procurement, and community engagement powers to effectively deliver its digital inclusion goals.

Should the governor appoint an entity other than the broadband office as the administering entity, a DEO or team should still be created, with a relationship to the broadband office where a minimum of one full-time employee will aid in coordination and lead the affordability work the broadband office will undertake to implement the Broadband Equity, Access, and Deployment (BEAD) program. The administering entity should be required to formally and actively coordinate with the broadband office throughout the life of the IIJA programs.

Once identified, the administering entity should focus on ensuring your state has the internal capacity and expertise to lead digital inclusion efforts. Many states and territories now have established broadband offices, however, only a few of these offices have dedicated staff to lead digital inclusion initiatives. To apply for DEA funds, states will be required to develop goals, objectives, and strategies for achieving digital equity. Most do not currently have the in-house expertise to do so, thus it will be necessary to hire new staff or dedicate a current staff member's time to digital inclusion.

Staffing the digital inclusion effort could take the form of creating a set of positions, a new team, or an entirely new office. NDIA strongly recommends your state establish a DEO to centralize all activities under the DEA and other state-level digital inclusion activities.

Staff Well - Anatomy of a Good Digital Equity Office (DEO) Structure

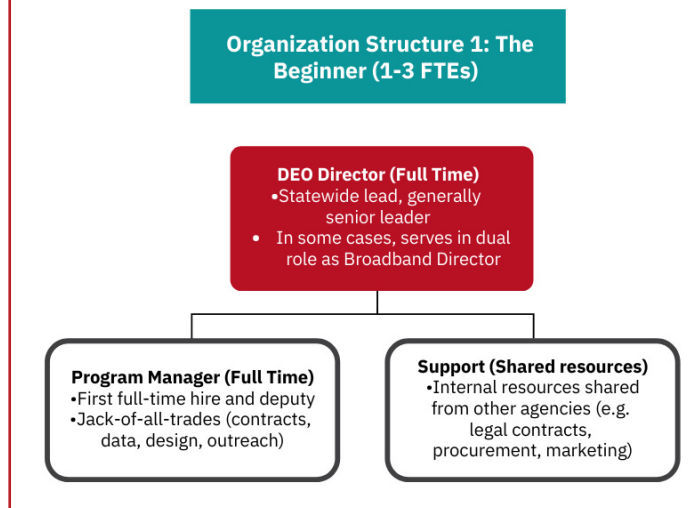
Exact staffing will inevitably vary across DEOs, especially because different states have established digital equity functions at different paces and have had access to unique internal resources and partnerships. [Louisiana](#), for example, is focusing its DEO hiring on digital inclusion specialists with research, data analysis, and program development skills. Whereas the State of New York's Director of Digital Equity [job posting](#) explicitly lists leading the DEA planning process as one of the role's key functions. Regardless of the skills and functions you identify as necessary and the staffing path you take, it's imperative your state dedicate a minimum of one FTE to digital inclusion work. Doing so provides the digital equity staff the opportunity to develop digital equity subject matter expertise and provides a clear digital equity point of contact for stakeholders among other benefits.

In general, your DEO organizational structure will be informed by the generally accepted approaches to hiring and organization within your state, available funding and hiring capacity, and time spent building broadband and digital equity functions to date, which is not a judgment on your state's effectiveness but a function of time, political will, and other factors. Below are three different approaches to DOE organization, with examples in Appendix A.

Organization Structure 1: The Beginner (1-3 FTEs)

For many states, the process of designing, building, and staffing a broadband and DEO organization is in its infancy (0-3 years old). The organizational structure is lean and focused.

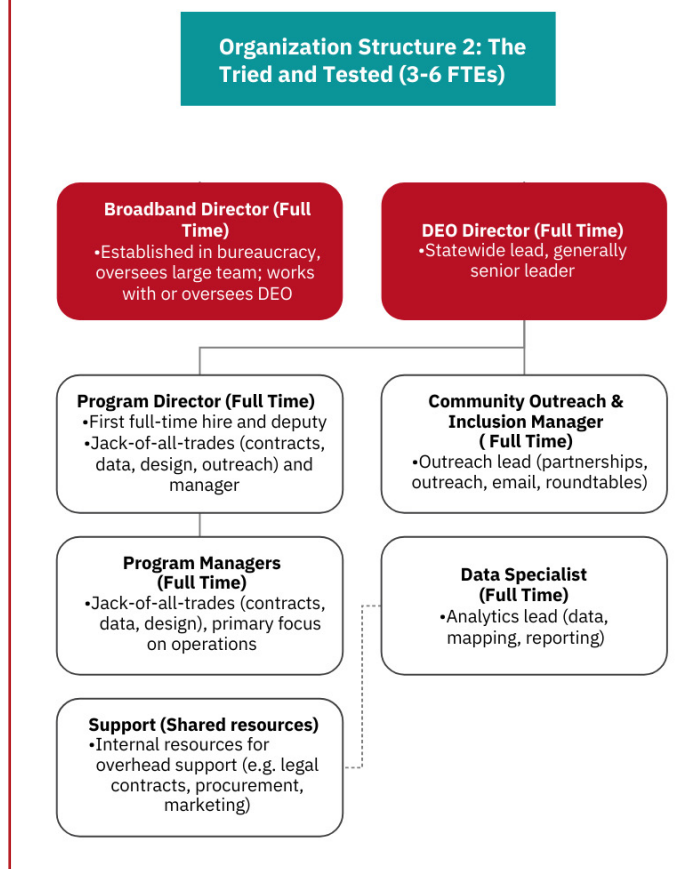
Figure 6



Organization Structure 2: The Tried and Tested (3-6 FTEs)

Some states such as [North Carolina](#) and [Washington](#) have spent a longer period of time (3-5 years) building out mature broadband and DEO organizations (either unified or co-existing). These states have typically received buy-in from their governor and legislature, already developed a five-year broadband plan with clear digital equity priorities, and have launched and managed digital equity programs over several years.

Figure 7



Organization Structure 3: The Veteran (7+ FTEs)

Eventually there will be states with sophisticated DEO offices with strong alignment with information technology, broadband, and other sister agencies. These offices will then be at a stage where they're managing distinct digital equity programming, serving key populations (e.g. affordable housing residents, schools, veterans), and investing in internal capacity for specialized functions (e.g. communications, contracts, legal, analytics).

Define DEO Role and Goals

Once staffed, you should define and outline the DEO's role and responsibilities for advancing digital equity. The state's knowledge, coordination, and convening ability and expertise, combined with its relationships with local governments and residents, provide a unique opportunity.

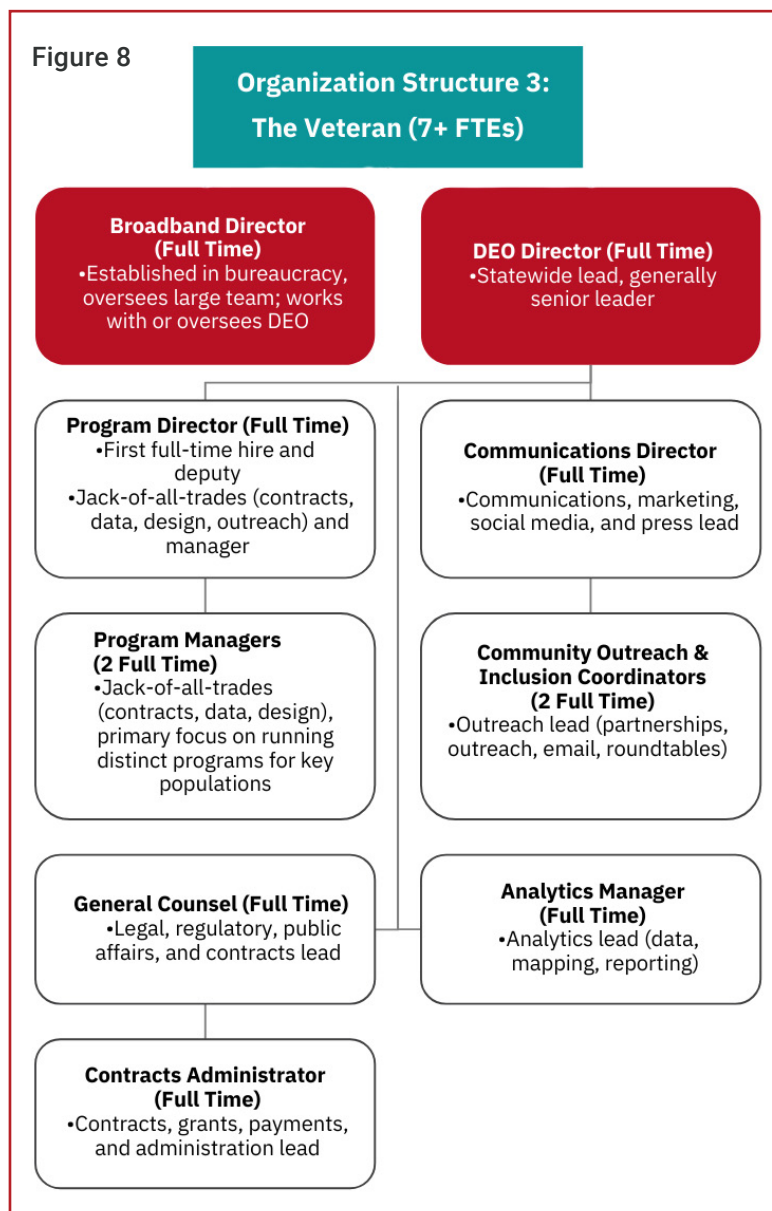
In addition to leading the digital equity planning process, the state

DEO (or lead's) roles and responsibilities could include:

- Leading the coordination of digital inclusion activities on behalf of the state
- Assisting in the development of digital equity policy
- Coordinating and distributing funding
- Strengthening local digital equity ecosystems
- Educating policymakers, local governments, and stakeholders on digital equity and inclusion
- Guiding digital equity focused data collection, research, and analysis
- Creating, piloting, and scaling digital inclusion programs

For more recommendations, see NDIA's white paper, ["Defining a State Digital Equity Office."](#)²²

Figure 8



²² Huffman, A. (2021). Defining a State Digital Equity Office. National Digital Inclusion Alliance. <https://www.digitalinclusion.org/defining-a-state-digital-equity-office/>

Create a Plan for the Plan

Sample Timeline

Spring 2022: Build state capacity and engage local communities.

- Build state capacity including identifying state digital equity lead and associated staff needs.
- Complete initial data analysis of state digital equity gaps, possibly defining a need for a survey.
- Preview digital equity gaps with executive leadership and legislature.
- Develop sample job descriptions for necessary DEO positions and ideal staging for hiring (e.g. priority A, B, and C).
- Meet with and listen to priorities from stakeholders .
- Solicit informal comments, local digital inclusion plans, information about on-going state broadband deployment projects and digital inclusion programs, suggestions, and other input from stakeholders.

Summer 2022: Begin NTIA DEA planning application process and identify data gaps.

- Launch and empower State DEO (if resources available).
- Solicit input from stakeholders on project plan.
- Identify data collection gaps and develop a strategy for filling them over time.
- Assemble core planning team and convene to establish expectations.
- Begin application process for planning grant .
- Develop communications plan.

Fall/Winter 2022: Finalize and submit DEA planning application and begin planning.

- Finalize and submit DEA State Planning application to NTIA.
- Prepare follow-up materials and responses to NTIA if requested for grant application.
- Continue launch and empowerment of State DEO (if resources available).
- Begin regular convening of core planning team.
- Develop stakeholder coordination and outreach and engagement plan, including intended communication and education opportunities with stakeholders.
- Develop rigorous but not onerous data collection and reporting process and regular (e.g. quarterly) stakeholder, community, and local government update process.
- Prepare internal agencies, contracting and procurement officers, and grant administrators for efficient acquisition of external planning support if it's needed.
- Obtain external support if deemed necessary.
- Identify and purchase any software identified as necessary for the plan's development (i.e. survey tools, project management tools, etc.).
- Launch planning process once funds are received.



Spring/Summer 2023: Execute outreach and engagement plan for CBOs and partners.

- Regularly convene core planning team to provide updates and drive the planning process.
- Implement communication, education, and outreach model for interested stakeholders.
- Implement data collection strategy.



Fall 2023: Finalize full DEA plan and prepare for implementation.

- Finalize data collection.
- Write plan.
- Publicly post plan for a minimum of 30 days for public comment (required by statute).
- Incorporate “worthwhile”²³ comments into plan.
- Submit plan to NTIA, send plan to stakeholders, and publish for the public.
- Prepare for the plan’s implementation.

Figure 9: DEA Pre-Planning Suggested Timeline: Spring 2022-Fall 2023



Spring 2022:
Build state capacity
and engage local
communities

Summer 2022:
Begin DEA planning
application process
and identify gaps.

**Fall / Winter
2022:** Finalize and
submit DEA
planning
application and
begin planning

**Spring / Summer
2023:** Execute
outreach and
engagement plan
for CBOs and
partners

Fall 2023:
Finalize full DEA
plan and prepare
for implementation

²³ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(c)(2)(B)(i)(II) (2021). <https://uscode.house.gov/view.xhtml?req=47+USC+1723&f=tree&sort&fq=true&num=13&hl=true&edition=prelim&granuleId=USC-prelim-title47-section1723>. The statute requires the DEA administering entity to, “Make any changes to the plan that the administering entity determines to be worthwhile”

HOW TO EXECUTE: STATE BEST PRACTICES

This section provides states with best practices gathered from your peers. NDIA conducted interviews with five state broadband offices—Louisiana, Rhode Island, Washington, Nebraska, and Wisconsin—to better understand different strategies the states were already engaged in and prepare them to leverage the DEA planning funds. This section also includes additional best practices identified in other states, through our NDIA affiliates, and NDIA’s subject matter expertise.

Lead with and Operationalize Equity

Digital equity won’t be achieved in any state if equity is an afterthought or a “lens” that is put on for the digital equity planning and implementation process alone. Instead, leading with equity, operationalizing it in an office’s daily work, and weaving it throughout all broadband programs—including the deployment programs—is essential. While there are many ways to lead with and operationalize equity, as follows are some practical recommendations.

Be Intentional with Your Language and the Details

The language you use to communicate with stakeholders throughout the DEA planning process matters. If you say your office is “leading with equity” but use phrases like, “now, let’s put on our equity lens,” those you interact with may believe that equity is optional and only thought of intermittently.

Similarly, being thoughtful and intentional about the details of the planning process matters in terms of signaling the value the DEO places on equity. For instance, if you host a listening session for both the DEA plan and the BEAD plan but your agency leadership only attend the BEAD session it signals to stakeholders that BEAD is a priority for leadership whereas DEA is not.

Additionally, intentionally planning the stakeholder outreach to provide opportunities for as many disconnected households to participate as much possible by selecting dates and times



“We intentionally avoid the language ‘equity lens’ because a lens can be taken off.

Equity should be a forever understanding.”

*Ernie Rasmussen, Digital Equity Manager, Washington State
Broadband Office, WA Department of Commerce*



where a diversity of households can engage, ensuring invitations to the stakeholder outreach events reach the disconnected, would lead to more equitable engagement and a more holistic plan. Additional things to consider for in-person meetings would be providing childcare, ensuring meeting locations are easily accessible from public transit or have ample parking, or providing travel vouchers or mass transit tickets for participants.

Center the Voices of Covered Populations and Historically Disconnected Communities

Throughout the planning, development, and implementation of the plan, intentionally identifying, uplifting and centering the voices of those most affected by the digital divide, the covered populations, and the disconnected communities will provide for a richer and more equitable planning process and plan.

One strategy several NDIA affiliates have begun incorporating in their community-based coalition work and digital inclusion work is to financially compensate the residents for participation in their work. Lived experts are members of covered populations, particularly individuals from historically disconnected communities with direct, lived experience of being disconnected. For example, the [Franklin County Digital Equity Coalition](#) has compensated lived experts for their participation as members of a research team to better understand the ramifications of different aspects of the digital divide in their communities. Another digital inclusion coalition plans to provide lived experts with \$5,000 for a 10-month commitment to participate in the coalition work as a co-chair of a subcommittee. The co-chair would commit to attending 80 percent of the subcommittee meetings, lead subcommittee meetings, and actively engage with the subcommittees’ work during that time.

Your state could invite lived experts to join the core planning team and/or other stakeholder touch points throughout the planning process. Including lived experts in the planning process provides a viewpoint and expertise to the team that cannot otherwise be obtained. The practice is radically humanizing and would enable your state to tangibly demonstrate respect for the residents you serve.

Content Simplicity and Translation

Another simple but important way to operationalize equity is to ensure all content the DEO publishes is comprehensible and translated into the state's predominant languages. Translating all materials developed throughout the planning process, including but not limited to public notices, surveys, flyers, informational pamphlets, etc., into simple, easy-to-understand language and the state's predominant languages will engage a wider pool of residents throughout your state. Additionally, we recommend translating and publishing materials into formats easily accessible for people with limited vision and those who are deaf or hard of hearing.

Use a Holistic Data Collection Approach

As you begin the data collection process prior to or during your planning process, utilizing a holistic approach to data collection as you quantify the gaps in connectivity and digital equity is another way to operationalize equity. [Research by NDIA](#) and other organizations have revealed that sizable gaps in connectivity are driven by and highly correlated with race and socioeconomic status, not just geography.

[North Carolina's Broadband Indices](#) are an example of a robust and holistic data collection and visualization approach by breaking down the specific challenges individual counties and census tracts face in order to better identify investment and programmatic opportunities. The Broadband Infrastructure Office partnered with Dr. Roberto Gallardo of Purdue University to create two indices comprising 19 variables that holistically break down the state's digital divide. The Broadband Infrastructure Office notes that the indices are useful because they help demonstrate need at the county and census tract level, identify the most beneficial types of investment, and determine where resources should be deployed.



Similarly, data that only accounts for availability of broadband infrastructure will result in an inaccurate assessment of the digital divide. Consider the variety of factors driving limited adoption including digital skills, access to devices, complicated signup processes for discounted internet service, expensive pricing, and poor speeds. This approach may require both quantitative and qualitative data collection methods. Qualitative methodologies, such as surveys, interviews, and focus groups, are time consuming but can provide a richer understanding of lived experiences and unique barriers to accessing the digital world different demographics may encounter. CBOs and community anchor institutions (CAIs) can also support qualitative data collection, but it is important to remember their resource and time constraints, and to avoid overly burdening them in this process. Finally, even though data can be limited, use all available tools to quantify and contextualize the gaps that you hypothesize might exist, including canvassing surveys in high-traffic public places and social service offices and rich experiential and anecdotal data via one-on-one conversations, focus groups, and existing community meetings.

Weave Digital Equity through Existing and Forthcoming Deployment Efforts

While the Digital Equity Act is a landmark piece of legislation, and \$2.75 billion will provide much needed support for the launch and operation of numerous digital inclusion programs and activities, the funding is a one-time investment over a five year period. Achieving digital equity will require larger and sustainable funding sources. However, intentionally weaving digital equity throughout all broadband programs and efforts instead of operating digital inclusion programs in silos apart from broadband deployment programs will not only contribute to enhancing the sustainability of digital inclusion programs but will also leverage existing investments and increase their potential impact.

BEAD

The Broadband Equity, Access, and Deployment (BEAD) program is a \$42.45 billion program authorized through the IIJA that will provide grants to states to bridge the digital divide.²⁴ NTIA is tasked with administering the program and will distribute a minimum of \$100 million to each US state, territory, and the District of Columbia.²⁵ The remaining funds will be apportioned based on the number of unserved locations in that state as well as the number of unserved locations in high-cost areas in that state, relative to national totals.²⁶ BEAD funds can be used to competitively award subgrants for, among other things, broadband deployment projects in unserved and underserved areas and broadband adoption projects (including programs to provide affordable internet-capable devices).²⁷

²⁴ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(b)(1-2) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

²⁵ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(c)(2) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

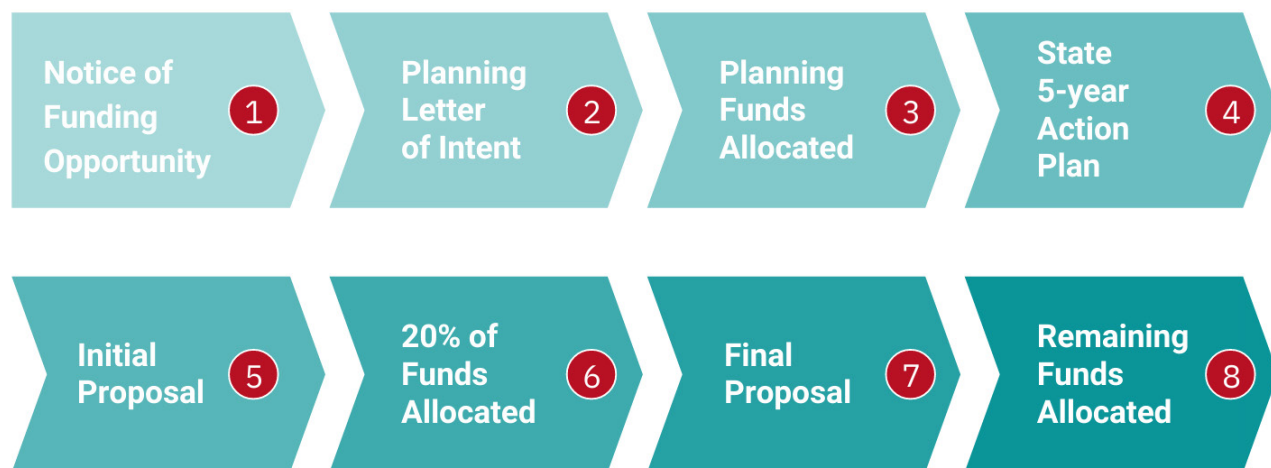
²⁶ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(c)(1,3) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

²⁷ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(f) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

Aligning BEAD and DEA Planning

As of the date of this publication, it is difficult to concretely compare the BEAD and DEA planning requirements, given the NOFO's have not yet been released. Requirements for both plans are described uniquely in the legislation using similar, but not precisely comparable terms.

Figure 10: BEAD Process



While the planning processes and end products may necessarily be separate, the two plans should be intentionally linked, complementary, and mutually supportive of obtaining the same goals. To establish a strong synergy and joint accountability between the two plans, we recommend the following:

1. **Include at least one member of the BEAD planning team on the DEA planning team.**
2. **Create a formal, direct communication and collaboration pathway between the BEAD and DEA planning teams.** A direct communication pathway would benefit both BEAD and DEA planning and would reduce the burden and confusion on community stakeholders, especially should the states interface directly with residents through surveys, focus groups, or town halls during the planning processes. Information gathered from stakeholders that may impact the DEA plan that is uncovered during the BEAD stakeholder engagement should be shared with the DEA planning team and vice versa. Given the interconnected nature of broadband availability and broadband adoption, a resident's experience with broadband and being disconnected is typically a mix of factors. As such, when asked about broadband, information about a lack of access to their household or neighborhood is as likely to be discussed as a household's inability to adopt the service if it's available to them because of adoption barriers. The burden of repeating their lived experiences, should not be placed on the residents engaging in the planning process.
3. **Integrate the portions of the BEAD and DEA plans where DEA covered populations are the focus of goals.** Covered populations as defined by DEA are populations statistically

likely to have lower broadband adoption rates. Considering their barriers to adoption within the BEAD plan will increase adoption of the funded deployment projects. For both plans, addressing broadband adoption barriers while deploying availability solutions will enhance all efforts.

4. Align plan goals and strategies, ensuring they complement and build on each other.

Aligning plan goals and strategies for DEA and BEAD plans will increase the impact of both. For example, both plans will need to address affordability. The strategies to address affordability in the DEA plan should build on the required low-cost service programs in the BEAD plan.

Beyond Planning

In addition to the planning, you can interweave digital equity throughout BEAD in other ways. BEAD funds can be used for broadband adoption projects, in addition to addressing deployment to unserved and underserved communities. As your state develops the BEAD five-year action

Figure 11

5-Year Broadband Action Plan

After a state receives planning funds under the BEAD program, it must develop a 5-year action plan.²⁸

DID YOU
KNOW?



Collaborate



Involve Local & Regional Entities



Align Planned Spending



Consider Related Connectivity Efforts

The action plan must be informed by collaboration with local and regional entities as well as detailed investment priorities, associated costs, and alignment of planned spending with economic development, telehealth, and related connectivity efforts.²⁹ NTIA will establish requirements for the action plan, which may include requirements to address local and regional needs in the state with respect to broadband service and propose solutions for the deployment of affordable broadband service in the state, among other things.³⁰

²⁸ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(e)(1)(D) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

²⁹ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(e)(1)(D)(i) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

³⁰ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(e)(1)(D)(ii) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

plan, where appropriate we encourage you to consider where BEAD funds can support broadband adoption projects in your state. Eligible broadband adoption projects may be further defined in the NOFO, however, traditional broadband adoption projects tend to include the same activities that are eligible for funding under the Digital Equity Competitive Grant Program established by the DEA.

States can also require BEAD sub-recipients to partner with trusted community-based organizations to assist eligible households with signing up for service, integrate local digital inclusion programming into their outreach initiatives, and prioritize outreach in low-income neighborhoods, particularly historically disconnected communities.

Finally, prioritizing the allocation of BEAD funds to community-based, locally accountable providers would advance digital equity. For example, community and municipally owned networks, electric member cooperatives (EMCs), and telephone member cooperatives (TMCs) are all community based and owned by community members, thus are proactively accountable to the community members and sensitive to their nuanced needs, including affordability barriers to broadband adoption.

Digital Equity Competitive Grant Program Eligible Activities

- (i) To develop and implement digital inclusion activities that benefit covered populations.
- (ii) To facilitate the adoption of broadband by covered populations in order to provide educational and employment opportunities to those populations.
- (iii) To implement, consistent with the purposes of this title—
 - (I) training programs for covered populations that cover basic, advanced, and applied skills; or
 - (II) other workforce development programs.
- (iv) To make available equipment, instrumentation, networking capability, hardware and software, or digital network technology for broadband services to covered populations at low or no cost.
- (v) To construct, upgrade, expend, or operate new or existing public access computing centers for covered populations through community anchor institutions.
- (vi) To undertake any other project and activity that the Assistant Secretary finds to be consistent with the purposes for which the Program is established.”³¹

Affordability Strategies

The fact that a broadband subscription is all too often not affordable for a household is a primary reason 28 million households across the country lack broadband in their homes.³² According to the Pew Research Center, 26 percent of people across the US are worried about paying for their internet bill over the next few months, and 54 percent of all households earning less than \$25,000 a year don’t have a broadband subscription.³³ Studies show that \$10 per

³¹ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1724(d)(2)(A) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1724%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1724\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1724%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1724)&f=treesort&edition=prelim&num=0&jumpTo=true)

³² Rafi Goldberg, Unplugged: NTIA Survey Finds Some Americans Still Avoid Home Internet Use, National Telecommunications and Information Administration, (Apr. 15, 2019), <https://www.ntia.gov/blog/2019/unpluggedntia-survey-finds-some-americans-still-avoid-home-internet-use>.

³³ Technology has been a lifeline for some during the coronavirus outbreak but some have struggled, too. (2021, August 31). Pew Research Center. https://www.pewresearch.org/internet/wp-content/uploads/sites/9/2021/08/PI_2021.09.01_covid-and-tech_0-01a.png

month is the most that low-income Americans can afford to pay for broadband.³⁴ However, according to US Telecom, the most popular broadband plans cost on average \$47.15, and the fastest broadband plans cost on average \$68.96.³⁵

Certain government programs like the [Affordable Connectivity Program](#) (ACP) can help promote broadband affordability. ACP is a federal program under the FCC which provides to eligible households monthly discounts of up to \$30 on internet service costs and one-time discounts of up to \$100 for connected devices. The monthly discount is higher (\$75) for households on qualifying Tribal lands and households in high-cost areas. However, ACP has a finite amount of funding and is not yet a permanent program.

Defining Affordability for ‘Low-Cost Broadband Service Options’

The IIJA charges states and territories with developing “low-cost broadband service options” in consultation with NTIA and broadband providers.³⁶ In addition, Capital Projects Fund recipients are encouraged to require sub-grantees (i.e. providers) include “at least one low-cost option offered at speeds that are sufficient for a household with multiple users to simultaneously telework and engage in remote learning.”³⁷

While NTIA will provide more details for their expectations for a low-cost service option in the BEAD NOFO, we’ve outlined three options states should consider for defining the low-cost service option as you prepare to plan for BEAD, DEA, and CPF.

Figure 12



\$10.00

What households with low incomes can afford



\$47.15

Average broadband plans



\$68.96

Fastest broadband plans

³⁴ Sallet, J. (2020, January 23). Creating an Affordability Agenda. Benton Foundation. <https://www.benton.org/blog/creating-affordability-agenda>

³⁵ Arthur Menko, 2020 Broadband Pricing Index, U.S. Telecom at 4 (2020, September 16), <https://www.ustelecom.org/research/2020-broadband-pricing-index-report/>.

³⁶ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(h)(5)(B) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1702%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1702\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1702%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1702)&f=treesort&edition=prelim&num=0&jumpTo=true)

³⁷ U.S. Department of the Treasury. (2021). Guidance for the Coronavirus Capital Projects Fund: For States, Territories, and Freely Associated States. (See page 4). <https://home.treasury.gov/system/files/136/Capital-Projects-Fund-Guidance-States-Territories-and-Freely-Associated-States.pdf>

Option A: Affordable Fixed Price Point

States can define and set the price of the low-cost option as a fixed price point that is affordable to eligible households (NTIA will provide guidance for determining household eligibility in the BEAD NOFO). For example, states may calculate an affordable monthly service cost to be \$30 per month for eligible households. Accordingly, the maximum price point of the “low-cost broadband service option” in that state would be \$30.

The main advantage to states for setting an affordable fixed price point for the “low-cost broadband service options” is that it is uniform and easy to enforce. Across all geographies and areas of broadband buildout under the BEAD program, the maximum price of the low-cost option would be a fixed number. The maximum price point of the low-cost option would not be dependent on changing variables such as geography or median area income.

The main disadvantage of this approach is its inflexibility in capturing what is “affordable” across different geographic and socioeconomic contexts. In some areas and to some communities, \$30 per month, for example, is an extremely affordable cost for internet service. In other areas and to other communities, \$30 per month is a large financial burden on households. States who set the price of a “low-cost broadband service option” too high may not address the internet affordability barrier for some households. On the flip side, if the price of the “low-cost broadband service option” is too low, smaller providers who cannot afford to provide service at that price point will not be able to offer the low-cost option and will not, consequently, be able to receive BEAD funding.

That said, we recommend states adopt the fixed price approach in defining and setting the price of the “low-cost broadband service option,” along with other measures to promote universal affordability and the fiscal solvency of providers. Read more about our recommendation below.

Option B: Percentage of Income





States can define and set the price of the “low-cost broadband service option” as a percentage of income of a household or of a geographic area. For example, you may determine that a household (or group of households) eligible for the “low-cost broadband service option” can afford to pay 1.5 percent of its income on internet service payments. Accordingly, the maximum price point of the “low-cost broadband service option” for that household (or group of households) would be equal to 1.5 percent of its income (or median income of that group of households). In this context, households are often grouped based on geography and similarity of household income.

Under this approach, the price of the “low-cost broadband service option” can adapt to the affordability needs of different households and communities.

The downside of this approach is that it is more complex and more difficult to enforce than a fixed-price approach. Under the percentage of income approach, the maximum price of a low-cost option may vary across households or communities, which can be confusing to households, providers, and government entities. The administrative burden associated with enforcing maximum low-cost option requirements across a state is steep.

NDIA does not recommend a percentage-of-income approach to define and set the price of the low-cost option. While flexible, this approach is very difficult to implement and will cause

Figure 13: Low-Cost Broadband Service Options

Definition	Considerations	Conclusion
 <p>Option A</p> <p>Affordable Fixed Price Point</p> <ul style="list-style-type: none"> Fixed Price Point E.g. \$30 or less per month for eligible households 	<ul style="list-style-type: none"> Uniform and easy to enforce Maximum price point not dependent on changing variables, such as geography or median area income Could be inflexible in capturing what is “affordable” across different geographic and socioeconomic contexts 	<p>NDIA recommends this approach over options B and C.</p> 
 <p>Option B</p> <p>Percentage of Income</p> <ul style="list-style-type: none"> A percent of income of a household or of a geographic area E.g. setting 1.5% of income as maximum price point for monthly broadband subscription 	<ul style="list-style-type: none"> Adaptable to the affordability needs of different households and geographies More complex and more difficult to enforce than a fixed priced approach High administrative burden 	<p>NDIA does not recommend a percentage of income approach.</p>
 <p>Option C</p> <p>Provider Cost + Return on Investment</p> <ul style="list-style-type: none"> Sum of the cost of providing service plus a reasonable return on investment for service providers E.g. provider’s cost of providing service + reasonable return on investment (10-15% usually)= maximum price point for the low-cost option 	<ul style="list-style-type: none"> Does not adequately prioritize consumer affordability in calculating the price point for the low-cost option Reliant on potentially unreliable provider data and calculations Requires an extremely high administrative and enforcement capacity. 	<p>NDIA does not recommend states adopt the provider cost + return on investment approach.</p>

confusion for households. However, NDIA does recommend states take into account the differences in what is “affordable” across different communities.

Option C: Provider Cost + Return on Investment

States can define and set the price of the “low-cost broadband service option” as the sum of the cost of providing service plus a reasonable return on investment for service providers. For example, a state could take a provider’s cost of providing service and add to it a reasonable return on investment (10-15 percent usually). The resulting sum would be the maximum price point for the low-cost option. In other contexts, those who cannot afford this price would likely be subsidized. In the context of BEAD, the low-cost option should be inherently affordable, without the need for additional subsidies such as the ACP benefit. Notably, while ACP may lower the cost of broadband for many households, it is not yet a permanent program.

This approach is more likely to ensure a financially profitable price point for internet service providers, especially for smaller providers with higher costs.

The problem with this approach is that it does not adequately prioritize consumer affordability in calculating the price point for the low-cost option—whereas the purpose of the low-cost is to address affordability barriers. Additionally, this approach is reliant on potentially unreliable provider data and calculations and requires an extremely high administrative and enforcement capacity.

NDIA recommends states not adopt the “provider cost + return on investment” approach in defining and setting the price of the low-cost option for the above reasons.

NDIA ‘Low-Cost Broadband Service Option’ Recommendation

Given the considerations outlined above, NDIA recommends states define and set the price of the “low-cost broadband service option” to be a maximum of \$30 per month for eligible households. This means an entity providing broadband service using a network deployed under the BEAD program shall offer not less than one low-cost broadband service option for eligible households—the monthly price of which shall be a maximum of \$30. Internet Service Providers (ISPs) are only required to offer the “low-cost broadband service option” in the locations funded by BEAD.

NDIA recommends a price point of \$30 because it is equivalent to the monthly service benefit that households can receive from the Affordable Connectivity Program (ACP), the federal program administered by the FCC and the Universal Administrative Service Company (USAC) that provides monthly service discounts to eligible households. NDIA urges states to define the household eligibility standards for the “low-cost broadband service option” using the same household eligibility standards of the ACP. NDIA also urges states to require service providers participating in the BEAD program to participate in ACP as well. Under this setup, any household that qualifies for the \$30 ACP benefit will also be eligible for a provider’s low-cost service option, which will be effectively free for anyone enrolled in ACP. Accordingly, states should conduct outreach and marketing efforts to encourage households that are eligible for the low-cost option to enroll in ACP. For example, New York State has required broadband grant recipients to participate in ACP and actively market the program to all customers.

Finally, NDIA recommends that states take further measures to promote universal affordability while supporting the fiscal solvency of providers.

Poverty and Income Analysis

The downside of establishing a fixed price point for the “low-cost broadband service option” is its inflexibility. In some communities, \$30 is extremely affordable. In others, it is not. As such, states should conduct an analysis of the state’s socioeconomic landscape to determine where the \$30 price point may not fully address affordability barriers. States should examine metrics such as median household income, property value, and number of households with students enrolled in school lunch programs. Through this analysis, states will gain a deeper understanding of where additional efforts will be needed to fully address affordability.

State Broadband Service Subsidies

States should consider establishing their own supplemental internet service subsidy program for low-income households and households more likely to be disconnected. A state subsidy would be particularly beneficial for households that are barely ineligible for the “low-cost broadband service option” or are barely ineligible to receive ACP benefits. For instance, households that earn at or below 200 percent of the federal poverty line are eligible for ACP and may be able to sign up for the low-cost option for free using the ACP benefit. Households at 201 percent of the federal poverty line are ineligible for ACP and may not qualify for a low-cost option that uses the same eligibility guidelines as ACP. These households may nevertheless struggle to afford monthly service payments and would benefit from receiving state support. Similarly, households with huge fluctuations in income (e.g. contract, gig, or freelance workers) may find themselves falling in and out of eligibility for connectivity subsidies.

Provider Appeal Process

Providers may assert that they cannot profitably provide service at a \$30 price point for the “low-cost broadband service option” in a particular area. States should establish a process through which providers can formally assert that the \$30 price point is infeasible, provide proof to that effect, and request an exemption from the \$30 maximum. In proving the financial infeasibility of providing service at a \$30 price point to a particular area, providers should be required to utilize a long-term profitability model in their financial projections and establish that profitability is impossible in the long-term, not just a short-term period of three to five years.³⁸

ACP Outreach

States can also impact affordability by ensuring their eligible households are aware of, understand, and enroll in the ACP program. Building awareness of the program requires concerted outreach across mediums (at home, at social service locations, via social media, phone, etc.) and in simple and accessible terms (e.g. multilingual outreach, plain English, not exceeding 8th-grade reading comprehension). Successful approaches are often all-hands-on-deck, requiring collaboration across offices and agencies who already interact with underserved households. For example, New York State conducted a [successful campaign](#) in early 2022 to educate consumers on the ACP, signing up an additional 100,000 households in less than three months. The state’s Office of Temporary and Disability Assistance is directing

³⁸ Falcon, E. (2020, June 4). Why Slow Networks Really Cost More Than Fiber. Electronic Frontier Foundation. <https://www.eff.org/deeplinks/2020/06/why-slow-networks-really-cost-more-fiber>

social services agencies to share outreach materials with clients and contracted service providers; Housing and Community Renewal reached out to housing nonprofits and landlords; the Department of Labor developed a PSA video; and the Department of Motor Vehicles pushed ACP information at state-operated offices.



Capital Projects Fund (CPF)

Capital Projects Fund recipients may use grant funds for “critical Capital Projects that directly enable work, education, and health monitoring, including remote options, in response to the public health emergency.” This means recipients may use grant funds for anything (with a few exceptions—roads, bridges, transit systems, etc.) that meets the following three criteria:

1. The Capital Project invests in capital assets designed to directly enable work, education, and health monitoring.
2. The Capital Project is designed to address a critical need that resulted from or was made apparent or exacerbated by the COVID-19 public health emergency.
3. The Capital Project is designed to address a critical need of the community to be served by it.

Even though a wide net is cast, Treasury anticipates most recipients will use the funds for broadband projects so they have stated that the following three types of projects are presumptively eligible:

1. Broadband Infrastructure Projects (construction and deployment of broadband infrastructure)
2. Digital Connectivity Technology Projects (purchase and/or installation of devices and equipment to facilitate broadband internet access)
3. Multi-Purpose Community Facility Projects (construction or improvement of buildings that are designed to jointly and directly enable work, education, and health monitoring)

Other eligible uses of CPF funds include:

- Digital literacy training, digital navigation, and digital inclusion services, if they are deemed “ancillary costs necessary to put the capital asset to use”³⁹
- Constructing or improving libraries, community health centers, or full-service community schools. Gigabit internet, public Wi-Fi, and lendable computers would be an “improvement”

³⁹ U.S. Department of the Treasury. (2021). Guidance for the Coronavirus Capital Projects Fund: For States, Territories, and Freely Associated States. (See page 7). <https://home.treasury.gov/system/files/136/Capital-Projects-Fund-Guidance-States-Territories-and-Freely-Associated-States.pdf>

for many libraries, community health centers, and full-service community schools.

- If an applicant requests funds to purchase computers (a capital asset) to lend through libraries, then digital literacy, technical support, and digital navigation expenses would also be eligible.
- If an applicant requests funds to build a gap network and addresses affordability through the network, they could also invest in community engagement and broadband adoption efforts to support subscription to the network.
- If an applicant requests funds to wire all libraries and community health centers with fiber, they could also invest in digital navigation and digital literacy courses.

For more information on what constitutes a broadband infrastructure project, a digital connectivity technology project, or a multi-purpose community facility project, see Treasury's [Capital Projects Fund Guidance](#).⁴⁰ You can read NDIA's major takeaways from the guidance [here](#).⁴¹

Coronavirus State and Local Fiscal Recovery Funds (SLFRF)

SLFRF funds may be used for a range of projects that respond to the public health and economic impacts of COVID-19, including:

- Affordability programs, such as subsidies that address the cost of internet service
- Digital literacy programs, such as standard digital literacy classes or digital navigator programs
- Programs that provide devices and equipment to access the internet to households (e.g., programs that provide equipment like tablets, computers, or routers)
- Services that expand internet access without constructing new networks (e.g. expansion of public Wi-Fi networks or free Wi-Fi in public housing communities)
- Other programs that support adoption of internet service where service is available

SLFRF funds may also be used to invest in broadband infrastructure. SLFRF recipients must address affordability while building new broadband networks. The SLFRF Final Rule states that "a project cannot be considered a necessary investment in broadband infrastructure if it is not affordable to the population the project would serve." The SLFRF Final Rule outlines two ways recipients should address affordability:

- "Lack of affordable broadband" is now considered a quality that recipients can use to identify areas eligible for investment with SLFRF funds.
- If a project provides internet service to households, it now requires the ISPs involved to

⁴⁰ <https://home.treasury.gov/system/files/136/Capital-Projects-Fund-Guidance-States-Territories-and-Freely-Associated-States.pdf>

⁴¹ <https://www.digitalinclusion.org/blog/2021/09/24/treasury-10-billion-capital-projects-fund-will-advance-digital-equity/>

participate in the Affordable Connectivity Program or comparable program.

For more information on eligible uses of SLFRF funds, see Treasury's [SLFRF Final Rule](#)⁴² or NDIA's Final Rule summary and example list of SLFRF-funded digital inclusion efforts [here](#)⁴³.

Integration with CMC & Tribal Connectivity Program

NTIA also manages the [Connecting Minority Communities Pilot Program](#)⁴⁴ (CMC) and [Tribal Broadband Connectivity Program](#)⁴⁵. Grantees from both of these programs could already be developing or launching digital inclusion projects or programs. Connecting with the CMC and Tribal Broadband Connectivity Program grantees in your state could provide an opportunity for partnership. In addition, the lessons they are learning through their projects could inform both your BEAD and DEA plan.

Penalize and Prevent Digital Discrimination

Another strategy states can implement to weave digital equity through their broadband deployment programs is to build in clawback clauses into grant agreements with ISPs aimed at preventing digital discrimination.

NDIA and others have documented numerous examples of digital redlining, i.e. discrimination by internet service providers in the deployment, maintenance, or upgrade of infrastructure or delivery of services. Communities harmed by digital redlining are often marginalized in other ways linked to the race, ethnicity, and/or economic status of their residents. Slow, unreliable broadband service and the absence of competition among providers can put redlined communities at a significant disadvantage in attracting and retaining residents and businesses, compared to better served neighboring areas. Obsolete technology also discourages broadband adoption in a variety of ways, most recently by blocking eligible residents of some redlined communities from taking full advantage of the Emergency Broadband Benefit and Affordable Connectivity Program.

⁴² <https://home.treasury.gov/system/files/136/SLFRF-Final-Rule.pdf>

⁴³ <https://www.digitalinclusion.org/blog/2022/01/18/final-rule-for-arpa-state-and-local-funds-yes-to-digital-inclusion-uses/>

⁴⁴ <https://broadbandusa.ntia.doc.gov/resources/grant-programs/connecting-minority-communities-pilot-program>

⁴⁵ <https://broadbandusa.ntia.doc.gov/resources/grant-programs/tribal-broadband-connectivity-program#:~:text=The%20Tribal%20Broadband%20Connectivity%20Program,broadband%20affordability%2C%20and%20digital%20inclusion.>

In the IIJA, Congress directs the FCC to develop rules to facilitate equal access to broadband internet access service, including preventing and eliminating digital discrimination based on income level, race, ethnicity, color, religion, or national origin.⁴⁶ Congress also directs the FCC to develop model policies and best practices that can be adopted by states and localities to ensure that internet service providers do not engage in digital discrimination.⁴⁷

Given the outsized negative ramifications of digital discrimination and digital redlining on historically disconnected communities and its direct and negative impact on equity, states should provide clear and bold requirements for BEAD funds to ensure BEAD funds are not used to support these practices, misusing taxpayer dollars without penalty.

Start Collaboration, Engagement, and Outreach

Robust and meaningful stakeholder collaboration, engagement, and outreach will be a hallmark of effective and successful state digital equity plans. Stakeholder engagement should not be a one-time occurrence, but rather be baked in throughout the entire planning process with multiple permeable pathways for residents and trusted community-based organizations to participate in the process.

Like all relationships, building goodwill and trust with your stakeholders through meaningful engagement takes time. The good news is you don't need to wait until the NOFOs are released or until you receive the grant funds to start.

Meet Your People Where They Are



In 2021, the Louisiana broadband office began a traveling roadshow, visiting 50+ small towns throughout Louisiana's 64 parishes. They reached out to mayors and local elected officials to organize listening sessions on broadband. They brought simple, one page informational flyers with data representing that community's broadband access, adoption, EBB enrollment rates, and digital literacy rates. They provided what information they had about the forthcoming state and federal funds and listened

⁴⁶ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1754(b) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1754%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1754\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1754%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1754)&f=treesort&edition=prelim&num=0&jumpTo=true)

⁴⁷ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1754(d) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1754%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1754\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1754%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1754)&f=treesort&edition=prelim&num=0&jumpTo=true)



to the community's broadband and digital inclusion needs. They purposely didn't use PowerPoint presentations, opting instead for roundtable-style sessions to provide a more intimate peer-to-peer environment. Other states have opted for virtual convenings, like Hawaii's Office of Broadband and Digital Equity, who in March 2020 virtually convened a group of allies working towards digital equity. The Broadband Hui as it's known, has met weekly since and consists of over 200

individuals and organizations. Both of these states' sustained engagement of partners and residents have greatly benefited both the stakeholders and the state leaders.

Create a Stakeholder Engagement Plan

Before you begin the planning process, we recommend you design a robust stakeholder engagement plan that weaves stakeholder engagement throughout the entire planning process and elevates the voices of those who directly work with or who themselves have direct lived experience of being disconnected. Ensuring the voices of covered populations and underrepresented groups are built into the planning process is essential to ensure the plan is comprehensive and truly addresses the concerns and needs of the state's disconnected residents. Intentionally engaging organizations trusted by historically disconnected communities will require thoughtful planning.

Approaches to Engagement

Knowing who to reach out to is only half the battle, because your approach to community engagement is equally important. Successful outreach should employ a mix of strategies, communications channels, and messengers to be effective, including:

- Using diverse communications tools to connect, including websites, social media, phone calls, info sessions and town halls, and old-fashioned door-to-door community outreach
- Meeting during non-work hours to ensure working adults, parents, and others can participate
- Striving for engagement across geographically diverse sections of your state
- Clarifying with engaged organizations your goals, the information you're looking to gather, how that input will be used, what type of follow-up you'll conduct, and how they can keep track of your work (e.g. website, listserv, ongoing public check-ins)

Engage Diverse Communities

The DEA requires the administering entity “list the organizations the State collaborated with in developing and implementing the plan.” Congress outlined a list of organizations to include in the planning and implementation process, including:

- Community anchor institutions, CBOs, and nonprofits
- Counties, city governments, and Indian Tribes, Alaska Native entities, or Native Hawaiian organizations (where applicable)
- Local educational agencies, school districts, and workforce development organizations

Additional Recommendations to Consider

CHECK IT OUT

While all state agencies should be included in some aspect of the planning process, the agencies who directly or indirectly serve the covered populations should be consulted throughout the planning process, including:

- Department of Education
- State Library
- Department of Health and Human Services
- Workforce Development Department
- Housing Department
- Department of Commerce or Economic Development
- State Technology or Digital Service Office
- Members of the covered populations and historically disconnected communities (lived experts)
- State cabinet-level agencies
- State corrections department/agency
- State departments of education
- Digital inclusion coalitions located in the state
- State and local chambers of commerce or industry associations
- Regional councils of governments
- Economic development authorities
- Higher education institutions
 - State higher education coordinating board or governing board
 - Community or Technical College System
 - Public and Private Universities
- Minority Serving Institutions
- Public housing resident associations and other low-income housing providers
- Labor unions (in particular telecommunications workers' unions)
- Healthcare systems and networks
- Homeless continuum of care providers
- Private and nonprofit multi-family housing developers and owners
- Faith-based institutions (i.e. churches, temples, mosques, etc.)
- Entrepreneurs and business owners
- State or local foundations and funders
- Advocacy organizations
- Existing multi-stakeholder groups (i.e. councils on aging, etc.)
- Refugee resettlement organizations
- Re-entry organizations
- Organizations serving undocumented residents
- Early intervention coordinators (i.e. those providing in-home therapy for children ages 3 to 5)
- Trade organizations
- Agriculture extension offices
- Cultural organizations
- Local media outlets such as PEG station leaders and Ethnic media

- Organizations that represent:
 - Individuals with disabilities, including children with disabilities
 - Aging individual
 - Individuals with language barriers (e.g. English learners, low English proficiency, immigrant groups)
 - Veterans
 - Incarcerated individuals in facilities other than Federal correctional facilities
- Civil rights organizations

Tribal Engagement

Like all other stakeholders, states should engage with Tribes in their state early and often through meaningful consultation. Engagements should be conducted as peer-to-peer engagements, as Tribes are sovereign and govern themselves. This means they're distinct governments and any decisions about the Tribes with regard to their property and citizens are made with their participation and consent. When consulting with and engaging with Tribes to develop your plan, do so using intergovernmental collaboration best practices.

Effective Tribal engagement requires meaningful consultation and proactive relationship-building efforts with members of Tribal communities. Rather than merely "box-checking," states should engage in good-faith, on-going efforts to empower Tribal communities in the planning process and to develop trustworthy relationships with Tribes in their states. States should avoid injecting Tribal communities into the planning process after substantial planning has already occurred; Tribal voices should be included in the planning process from the beginning to end.

Just as you are requesting broadband and digital equity plans along with information about on-going broadband deployment projects and digital equity programs from local and regional governments in your state, also request this information from Tribes located in your state. Staying in communication with Tribes will ensure you know of any changes that could impact your digital equity plan.

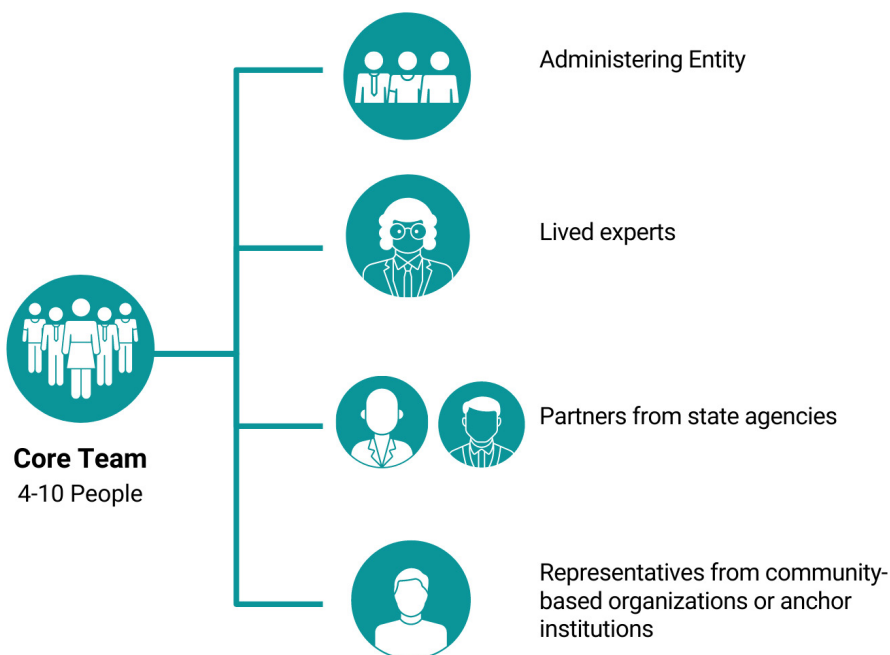
If Tribes in your state do not have broadband or digital equity plans or activities, encourage them to create plans. A good place to refer them to is <https://tribalresourcecenter.net>.

Form a Core Planning Team

Creating the state digital equity plan will necessarily be a team effort. Thus the first recommended step is to form a core planning team consisting of a diverse set of stakeholders and partners to lead and advise the plan's development. The core planning team should, at a minimum, be composed of multiple staff members of the administering entity and a member of the team leading the BEAD planning process. Additional core planning team members could include partners from other state

agencies, universities, representatives of community-based organizations and community anchor institutions who work directly with the covered populations, digital inclusion practitioners, and “lived experts” who are members of the covered populations. The administering entity should lead the planning team and the development of the plan, but the core planning team can serve as an advisory group of sorts, supporting the administering entity as it progresses through the planning process.

Figure 14: Core Planning Team



The core planning team should be between four and 10 people—a small group but large enough to ensure a variety of voices are included throughout the process and large enough to disburse responsibilities. The administering entity should clearly define and delineate roles and expectations for each planning team member. Throughout the planning process, the core team can provide feedback and guidance to the administering entity. In addition, the core team could support the administering entity in identifying and connecting with stakeholders among other tasks that will present themselves throughout the planning process.

Finally, states should consider leveraging their planning funds to pay “lived experts,” or residents of the covered populations with direct, lived experience of being caught in the digital divide, to be members of the planning team.

Collaborate with State Agencies and Peers

The effectiveness of your digital equity strategy will depend on your ability to marshal and scale all available resources across your state government apparatus. This means leveraging informal state working groups or formal planning organizations, including existing appointed or convened broadband and digital equity task forces and councils. You should understand existing touchpoints your state agencies already have with covered populations (e.g. families with low incomes, individuals with disabilities, veterans) and maximize your ability to collect data on existing gaps in infrastructure and services and efficiently communicate the DEO’s

existing and forthcoming offerings.

For example, Colorado incorporated its Digital Skills Survey [into existing surveys](#)⁴⁸ run by the Colorado Department of Public Health & Environment to minimize additional effort on the part of state agencies and target populations. Other states have worked with high-touch agencies and offices with direct connections to target populations, including the department of motor vehicles, housing and homelessness agencies, SNAP and social service offices, department of corrections, department of labor and unemployment, and health and human services agencies. Using your planning structure, existing relationships, and the DEO's mandate, incorporate surveying and messaging content in existing mailers, fliers, email campaigns, social media content, town halls, and websites. Focus on highlighting existing offerings, the importance of accurate data collection to deliver new services, and pointing to the DEOs website as the best source of updated information. Finally, leverage NDIA's existing list of state templates (Appendix A) and reach out directly to colleagues in other states to quickly replicate best practices.



Establish a Task Force or Council

As a part of general broadband expansion planning or in response to the pandemic, some states such as Wisconsin and Illinois have appointed a broadband or digital equity planning task force or council tasked with advising state broadband offices and DEOs on bridging their digital divides. These councils are either established by legislative statutes, executive orders, or in some cases, are informal (i.e. established without an executive order or statute), public-facing or internal government-facing (e.g. working groups of state agency leads).

Wisconsin, for example, has a Task Force on Broadband Access, established through an executive order from Governor Evers in 2020, which includes a digital equity subcommittee and a Digital Equity and Inclusion Stakeholder group of 50 to 60 people. The governor selected the members of the Task Force who led the compilation of a [report](#)⁴⁹ in 2021 with recommendations to close broadband access gaps and increase broadband adoption and affordability. The Wisconsin [Public Service Commission](#) (PSC) convenes the stakeholder group monthly. The digital equity and inclusion stakeholder group, which has an open door policy, meets virtually each month and provides organizations the opportunity to form relationships, establishing connections between different organizations and sectors who either directly run digital inclusion programs or whose



⁴⁸ Bergson-Shilcock, A. (2022, March 22). States are leading the way on digital equity [National Skills Coalition]. Skills Blog. <https://nationalskillscoalition.org/blog/digital-equity/states-are-leading-the-way-on-digital-equity/>

⁴⁹ Governor's Task Force on Broadband Access | Report to Governor Tony Evers and Wisconsin State Legislature. (2021). Public Service Commission of Wisconsin. <https://psc.wi.gov/Documents/broadband/2021%20Governors%20Task%20Force%20on%20Broadband%20Access.pdf>



work is impacted by digital inequities. Rhode Island also plans to establish an interagency working group to engage sister agencies and support the coordination and execution required to implement the BEAD and DEA programs.

You will likely need to staff, chair, or be a member of your task force/council or work in tandem with its existing membership. In the event that you are asked to advise on appointments to the council, ensure that diverse organizations are represented, including social service institutions, community-based organizations, digital service providers, essential government agencies, and forward-thinking and collaborative internet service providers.

Learn from Digital Inclusion Practitioners

A state digital equity plan should be designed to create specific, statewide strategies to serve those most affected by the digital divide. Yet many plans are created in a vacuum without input from those the plan is designed for—the residents. No state leader can learn the specific needs of each of their residents. However, states can learn from the many organizations that have developed thoughtful strategies incorporating community input into their planning process.

The digital inclusion field is relatively young. Yet, best practices and models for holistically addressing the digital divide exist. Before you embark on the planning process, spend time learning about what has and hasn't worked for those working toward digital equity in your state and across the country. Consult existing local digital equity plans and learn about ongoing digital inclusion or broadband deployment coalitions, projects and programs in your state. In addition, talk to peers across the country and join networks like NDIA, where many local and state subject matter experts regularly meet and discuss promising practices and practical research. See Appendix A for a list of resources.

In addition, the DEO should begin getting to know the local digital inclusion practitioners across their state. NDIA estimates that more than 40 communities (cities, towns, and regions) across the country have at least one active digital inclusion coalition. Identifying existing coalitions in your state and attending their meetings to get to know the practitioners, organizations, and the digital inclusion work they do can assist the state as it begins stakeholder engagement. For example, Ohio's broadband office regularly attends local digital inclusion coalition meetings and in doing so has established relationships with the 30 to 50 digital inclusion organizations that are members of each coalition. Coalitions are also positioned to support the DEO as they engage with residents in the planning process.



Use and Collect Data to Understand Assets and Needs

Your plan will rely heavily on the best available data to quantify need and estimate cost. While you will collect data during the planning process, you should prepare to begin the data collection process by beginning to plan how you will collect data, learning about the existing data sources, thinking through your existing data and how it can be leveraged for the plan (i.e. speed test data, digital skills data, etc.) and identifying whether local governments or digital inclusion coalitions in your state have already begun collecting local data that could be included in your asset inventory and needs analysis.

The “Triple A” framework is useful for thinking through quantifying need—see Figure 15.

Many states have run such analyses, with select formats and templates available in Appendix A. In general, information offered by the FCC or commercial ISPs might overstate the availability and affordability of existing services. Availability analysis can be complicated by including speeds that are lower than what is generally accepted as “broadband” (≥ 100 Mbps). Affordability analysis can be complicated by including introductory offers and pricing that

REMEMBER

Availability
Affordability
Adoption

Figure 15

Asset or Need	Examples of Data Sources
Availability: Do households have option(s) for high-speed broadband (≥ 100 Mbps)? Are service providers offering digital skills training and at least 1 computer?	FCC Form 477, State/local mapping, Geotel telecommunications infrastructure data (proprietary), speed tests (national datasets from FCC, Ookla, M-Lab; state and local speed test data), asset mapping of digital skills training and low-cost computer programs
Affordability: Are internet service and device options affordable to households?	Surveys of ISPs and service providers, State/local surveys of residents, NDIA Free & Low-Cost Plans list
Adoption: Do households consistently subscribe to and use internet service?	American Communities Survey (ACS) 1-year and 5-year estimates, FCC Internet Access Services Reports, EBB/ACP enrollment, State/local surveys of residents

requires families to subscribe to multiple television and phone services or pay additional rental and equipment fees. While gathering data in a timely manner is critical, your means of gathering data is equally important, especially because disconnected or poorly connected communities are hard to reach digitally. Consider employing door-knocking teams in affordable housing complexes, calling and texting residents, gathering in-person data at town halls, or asking questions at existing high-traffic social services offices (e.g. DMVs, unemployment offices) and public education institutions (e.g. community colleges) to ensure you are reaching the least connected groups.

States often struggle to understand what to prioritize as they quantify gaps in Triple A. For states moving beyond “rosy” availability data to collect granular information on actual prices charged by providers and what barriers and concerns limit a household’s ability to adapt services (e.g. caretaking duties, work, fear about government surveillance, lack of technical understanding, lack of time) will enable the state to have a better understanding of areas to prioritize.

Some states have collected their own data throughout the state and others have equipped local governments and coalitions to collect local data including assets. Hawaii, for example, has done a statewide [study of digital literacy and readiness](#)⁵⁰ and Utah launched a statewide [speed test and survey](#). Whereas, [Nebraska](#) and [North Carolina](#) have created tools for local coalitions and local governments to develop local digital inclusion plans. The resources they’ve created could be useful for communities in your state seeking to develop their own local digital inclusion plans and for you as you create your data collection plan.



⁵⁰ Hawai'i Digital Literacy and Readiness Study. (2021). State of Hawai'i Department of Labor & Industrial Relations. <https://labor.hawaii.gov/wdc/files/2021/11/Final-Statewide-Digital-Literacy-Survey-Report-from-Omnitrak-11.15.2021.pdf>

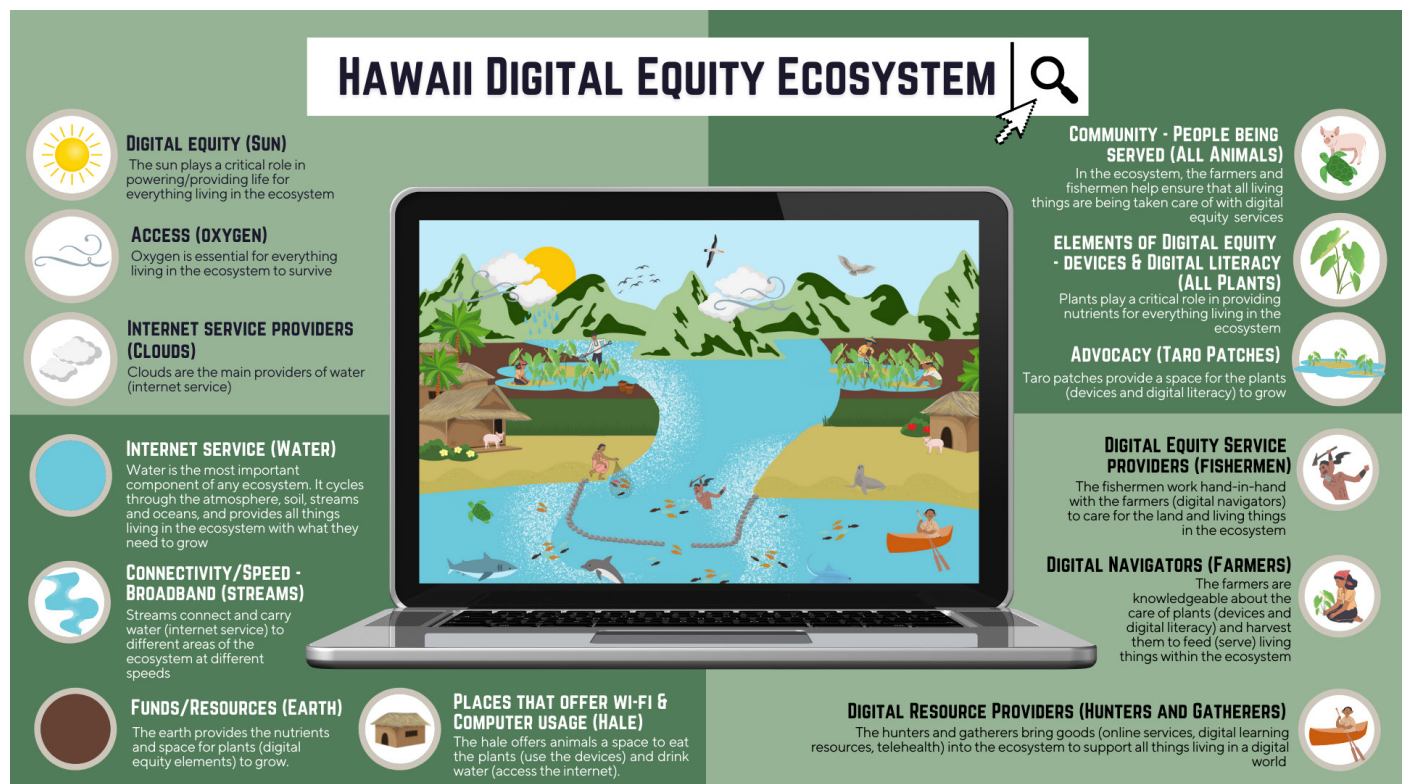
Asset Mapping

[Asset mapping](#) identifies a community's existing resources, networks, and strengths in order to build upon them. In doing so, it shifts the focus from documenting all of the things wrong with a community and its residents to inventorying the wealth of resources and expertise available. By leveraging the resources present in a community, asset mapping helps to identify opportunities to support and scale strategies that are already in place. This, in turn, supports empowerment of community residents and institutions and promotes ownership in the community-building process.

An asset inventory for the purposes of your state digital equity plan will be a snapshot of the current landscape, an inventory of the assets present throughout the state that currently do, or potentially could, support digital equity in each of these categories, prior to outlining measurable objectives. The inventory should be inclusive of physical assets such as broadband infrastructure and ongoing deployment projects; organizations, programs, and individuals delivering digital inclusion services; funding sources to support digital equity work; and any other resources deemed important to characterize the digital equity landscape. To establish meaningful and measurable objectives requires a thorough understanding of the current landscape.

Hawaii's [digital equity ecosystem map](#) is a stunning example of a collective effort to understand and document the state's current digital equity ecosystem while simultaneously setting goals for growth.

Figure 16



NEXT STEPS

Between mid-May and mid-June 2022, NTIA will release the DEA NOFO. This guide is intended to provide support for you as you begin thinking about how to approach that process while simultaneously managing ARPA funds and preparing for BEAD. In the coming months, NDIA will continue to provide resources and support to you as you plan for and begin the DEA planning process. We recommend picking a few of these recommended best practices that make the most sense given your environment and reality to prepare for what's to come. Any steps towards preparing for the DEA will position your state to be better prepared for the funds and their implementation.

APPENDICES

Appendix A: Best Practices across States

State	Type	Link	Description
California	Research - Equity Best Practices	Link	California research on quick strategies to improve EBB enrollment
California	Planning Document - Commission Report	Link	California “Broadband for All” planning document
Colorado	Research - Digital Skills Survey	Link	Colorado Digital Skills Survey Questions
Louisiana	Research - Geographic Data	Link	Dashboard highlighting broadband access, affordability, and digital literacy across LAs parishes
Louisiana	Org Design - Commission Mandate	Link	Executive order highlighting the roles, responsibilities, and mandate of Louisiana’s broadband for all commission
National	Org Design - Team Structure	Link	National Broadband Resource Hub document on structuring state broadband offices
Nebraska	Planning Document - Planning Guide	Link	Nebraska Digital Inclusion Planning Guide & Workbook
Nebraska	Planning Document - Plan Template	Link	Nebraska Digital Inclusion Plan Template
New York	Org Design - Job Description	Link	Director of Outreach JD
New York	Org Design - Job Description	Link	Digital Inclusion Manager for NYCHA JD
New York	Org Design - Job Description	Link	Director of Digital Equity
North Carolina	Research - Geographic Data	Link	Index highlighting broadband availability, quality, and adoption
North Carolina	Research - Community Outreach Guide	Link	Guide for doing broadband access and adoption outreach across communities using multiple mediums
Washington	Research - Community Outreach Guide	Link	Washington Digital Equity Forum
Wisconsin	Planning Document - Commission Report	Link	Governor’s Task Force report and recommendations on broadband and digital equity expansion
Wisconsin	Org Design - State Org Chart	Link	Wisconsin statewide broadband and digital equity office organizational chart

Appendix B: Definitions

Digital Equity

Digital equity is a condition in which all individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy. Digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services.

Digital Inclusion

Digital inclusion refers to the activities necessary to ensure that all individuals and communities, including the most disadvantaged, have access to and use of Information and Communication Technologies (ICTs). This includes 5 elements: 1) affordable, robust broadband internet service; 2) internet-enabled devices that meet the needs of the user; 3) access to digital literacy training; 4) quality technical support; and 5) applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration. Digital inclusion must evolve as technology advances. Digital inclusion requires intentional strategies and investments to reduce and eliminate historical, institutional and structural barriers to access and use technology.

Digital Literacy

NDIA recommends the American Library Association's definition of "digital literacy" via their Digital Literacy Task Force:

Digital literacy is the ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills.

A digitally literate person:

- Possesses the variety of skills – technical and cognitive – required to find, understand, evaluate, create, and communicate digital information in a wide variety of formats;
- Is able to use diverse technologies appropriately and effectively to retrieve information, interpret results, and judge the quality of that information;
- Understands the relationship between technology, life-long learning, personal privacy, and stewardship of information;
- Uses these skills and the appropriate technology to communicate and collaborate with peers, colleagues, family, and on occasion, the general public; and
- Uses these skills to actively participate in civic society and contribute to a vibrant, informed, and engaged community.

Digital Divide

The digital divide is the disparity in access to, knowledge of, and ability to use digital tools and technology.

Appendix C: The Digital Equity Act - State Plan Section

*The following text is from the Infrastructure Investment and Jobs Act

DIVISION F—BROADBAND
TITLE III—DIGITAL EQUITY ACT OF 2021
SEC. 60304. STATE DIGITAL EQUITY CAPACITY GRANT PROGRAM.

(c) STATE DIGITAL EQUITY PLAN.—

(1) DEVELOPMENT; CONTENTS.—A State that wishes to be awarded a grant under subsection (d) shall develop a State Digital Equity Plan for the State, which shall include—

(B) measurable objectives for documenting and promoting, among each group described in subparagraphs (A) through (H) of section 60302(8) located in that State—

- (i) the availability of, and affordability of access to, fixed and wireless broadband technology;
- (ii) the online accessibility and inclusivity of public resources and services;
- (iii) digital literacy;
- (iv) awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and
- (v) the availability and affordability of consumer devices and technical support for those devices;

(C) an assessment of how the objectives described in subparagraph (B) will impact and interact with the State's—

- (i) economic and workforce development goals, plans, and outcomes;
- (ii) educational outcomes;
- (iii) health outcomes;
- (iv) civic and social engagement; and
- (v) delivery of other essential services;

(D) in order to achieve the objectives described in subparagraph (B), a description of how the State plans to collaborate with key stakeholders in the State, which may include—

- (i) community anchor institutions;
- (ii) county and municipal governments;
- (iii) local educational agencies;
- (iv) where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;
- (v) nonprofit organizations;
- (vi) organizations that represent—
 - (I) individuals with disabilities, including organizations that represent children with disabilities;
 - (II) aging individuals;
 - (III) individuals with language barriers, including—
 - (aa) individuals who are English learners; and
 - (bb) individuals who have low levels of literacy;
 - (IV) veterans; and
 - (V) individuals in that State who are incarcerated in facilities other than Federal correctional facilities;
- (vii) civil rights organizations;
- (viii) entities that carry out workforce development programs;
- (ix) agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;
- (x) public housing authorities in the State; and
- (xi) a partnership between any of the entities described in clauses (i) through (x); and

(E) a list of organizations with which the administering entity for the State collaborated in developing and implementing the Plan.

Appendix D: Covered Populations

The DEA defines the populations.

Covered Populations⁵¹:

1. Individuals who live in covered households (ie. households with income less than or equal to 150 percent of federal poverty level);
2. Aging individuals;
3. Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
4. Veterans;
5. Individuals with disabilities;
6. Individuals with a language barrier, including individuals who—
 - a. are English learners; and
 - b. have low levels of literacy;
7. Individuals who are members of a racial or ethnic minority group; and
8. Individuals who primarily reside in a rural area.

⁵¹ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1721(8) (2021). [https://uscode.house.gov/view.xhtml?req=\(title:47%20section:1721%20edition:prelim\)%20OR%20\(granuleid:USC-prelim-title47-section1721\)&f=treesort&edition=prelim&num=0&jumpTo=true](https://uscode.house.gov/view.xhtml?req=(title:47%20section:1721%20edition:prelim)%20OR%20(granuleid:USC-prelim-title47-section1721)&f=treesort&edition=prelim&num=0&jumpTo=true)

Appendix E: Broadband Equity, Access, and Deployment Program Planning Requirements

(D) ACTION PLAN.—

(i) IN GENERAL.—An eligible entity that receives funding from the Assistant Secretary under subparagraph (C) shall submit to the Assistant Secretary a 5-year action plan, which shall—

(I) be informed by collaboration with local and regional entities; and

(II) detail—

(aa) investment priorities and associated costs;

(bb) alignment of planned spending with economic development, telehealth, and related connectivity efforts.

(ii) REQUIREMENTS OF ACTION PLANS.—The Assistant Secretary shall establish requirements for the 5- year action plan submitted by an eligible entity under clause (i), which may include requirements to—

(I) address local and regional needs in the eligible entity with respect to broadband service;

(II) propose solutions for the deployment of affordable broadband service in the eligible entity;

(III) include localized data with respect to the deployment of broadband service in the eligible entity, including by identifying locations that should be prioritized for Federal support with respect to that deployment;

(IV) ascertain how best to serve unserved locations in the eligible entity, whether through the establishment of cooperatives or public-private partnerships;

(V) identify the technical assistance that would be necessary to carry out the plan; and

(VI) assess the amount of time it would take to build out universal broadband service in the eligible entity.

(2) NOTICE OF AVAILABLE AMOUNTS; INVITATION TO SUBMIT INITIAL AND FINAL PROPOSALS.—

On or after the date on which the broadband DATA maps are made public, the Assistant Secretary, in coordination with the Commission, shall issue a notice to each eligible entity that—

(A) contains the estimated amount available to the eligible entity under subsection (c); and

(B) invites the eligible entity to submit an initial proposal and final proposal for a grant under this section, in accordance with paragraphs (3) and (4) of this subsection.

(3) INITIAL PROPOSAL.—

(A) SUBMISSION.—

(i) IN GENERAL.—After the Assistant Secretary issues the notice under paragraph (2), an eligible entity that wishes to receive a grant under this section shall submit an initial proposal for a grant, using the online application form developed by the Assistant Secretary under paragraph (1)(A)(iii), that—

(I) outlines long-term objectives for deploying broadband, closing the digital divide,

and enhancing economic growth and job creation, including—

(aa) information developed by the eligible entity as part of the action plan submitted under paragraph (1)(D), if applicable; and

(bb) information from any comparable strategic plan otherwise developed by the eligible entity, if applicable;

(II)

(aa) identifies, and outlines steps to support, local and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide; and

(bb) describes coordination with local governments, along with local and regional broadband planning processes;

(III) identifies existing efforts funded by the Federal Government or a State within the jurisdiction of the eligible entity to deploy broadband and close the digital divide;

(IV) includes a plan to competitively award subgrants to ensure timely deployment of broadband;

(V) identifies—

(aa) each unserved location or underserved location under the jurisdiction of the eligible entity; and

(bb) each community anchor institution under the jurisdiction of the eligible entity that is an eligible community anchor institution; and

(VI) certifies the intent of the eligible entity to comply with all applicable requirements under this section, including the reporting requirements under subsection (j)(1).

(ii) LOCAL COORDINATION.—

(I) IN GENERAL.—The Assistant Secretary shall establish local coordination requirements for H. R. 3684–764 eligible entities to follow, to the greatest extent practicable.

(II) REQUIREMENTS.— The local coordination requirements established under subclause (I) shall include, at minimum, an opportunity for political subdivisions of an eligible entity to—

(aa) submit plans for consideration by the eligible entity; and

(bb) comment on the initial proposal of the eligible entity before the initial proposal is submitted to the Assistant Secretary.

(B) SINGLE INITIAL PROPOSAL.—An eligible entity may submit only 1 initial proposal under this paragraph.

(C) CORRECTIONS TO INITIAL PROPOSAL.—The Assistant Secretary may accept corrections to the initial proposal of an eligible entity after the initial proposal has been submitted...

(4) FINAL PROPOSAL.—

(A) SUBMISSION.—

(i) IN GENERAL.—After the Assistant Secretary approves the initial proposal of an eligible entity under paragraph (3), the eligible entity may submit a final proposal for the remainder of the amount allocated to the eligible entity under subsection (c), using the online application form developed by the Assistant Secretary under paragraph (1)(A)(iii), that includes—

-
- (I) a detailed plan that specifies how the eligible entity will—
 - (aa) allocate grant funds for the deployment of broadband networks to unserved locations and underserved locations, in accordance with subsection (h)(1)(A)(i); and
 - (bb) align the grant funds allocated to the eligible entity under subsection (c), where practicable, with the use of other funds that the eligible entity receives from the Federal Government, a State, or a private entity for related purposes;
 - (II) a timeline for implementation;
 - (III) processes for oversight and accountability to ensure the proper use of the grant funds allocated to the eligible entity under subsection (c); and
 - (IV) a description of coordination with local governments, along with local and regional broadband planning processes.
- (ii) LOCAL COORDINATION.—
- (I) IN GENERAL.—The Assistant Secretary shall establish local coordination requirements for eligible entities to follow, to the greatest extent practicable.
 - (II) REQUIREMENTS.— The local coordination requirements established under subclause (I) shall include, at minimum, an opportunity for political subdivisions of an eligible entity to—
 - (aa) submit plans for consideration by the eligible entity; and
 - (bb) comment on the final proposal of the eligible entity before the final proposal is submitted to the Assistant Secretary. H. R. 3684—766
- (iii) FEDERAL COORDINATION.—To ensure efficient and effective use of taxpayer funds, an eligible entity shall, to the greatest extent practicable, align the use of grant funds proposed in the final proposal under clause (i) with funds available from other Federal programs that support broadband deployment and access.
- (B) SINGLE FINAL PROPOSAL.—An eligible entity may submit only 1 final proposal under this paragraph.
- (C) CORRECTIONS TO FINAL PROPOSAL.—The Assistant Secretary may accept corrections to the final proposal of an eligible entity after the final proposal has been submitted.

Appendix F: Examples of Local & Regional Digital Equity/Inclusion Plans

Local Governments

[Alamance County Digital Inclusion Plan \(2021\)](#)
[Carteret County Digital Inclusion Plan \(2021\)](#)
[City of Long Beach Digital Inclusion Roadmap \(2021\)](#)
[Digital Durham Digital Equity Plan \(2021\)](#)
[Forsyth County Digital Equity Plan \(2021\)](#)
[Rockingham County Digital Inclusion Plan \(2021\)](#)
[City of Bloomington Digital Equity Strategic Plan \(2020\)](#)
[City of Seattle Internet for All Report \(2020\)](#)
[New York City Internet Master Plan \(2020\)](#)
[City and County of San Francisco Digital Equity Strategic Plan \(2019\)](#)
[City of Detroit Digital Equity & Inclusion 2019 + 2020 Timeline \(n.d.\)](#)
[Provo City Government Digital Equity Administrative Directive \(2019\)](#)
[Salt Lake City Digital Equity Policy \(2019\)](#)
[City of Kansas City Digital Equity Strategic Plan \(2017\)](#)
[Louisville Metro Government Digital Inclusion Plan \(2017\)](#)
[City of Austin Digital Inclusion Strategy \(2016\)](#)
[City of Portland Digital Equity Action Plan \(2016\)](#)
[District of Columbia Digital Divide Report \(2015\)](#)

Regional

[Land of Sky Regional Council Digital Inclusion Plan \(2021\)](#)
[Upper Coastal Plain Digital Inclusion Plan \(2021\)](#)

Appendix G: Resources and Support

General Digital Inclusion Resources

From NDIA

- [Digital Inclusion Coalition Guidebook](#)
- [Defining a State Digital Equity Office White Paper](#)
- [Digital Inclusion Startup Manual](#)
- [Digital Inclusion Trailblazers \(local governments\)](#)
- Database of local and regional place-based digital equity coalitions (forthcoming in 2022)

From Other Organizations

- [Broadband Technology and Opportunities Program Evaluation Study](#), ASR Analytics
- [Broadband Adoption Toolkit](#), NTIA
- [Digital Navigator's Toolkit](#), Salt Lake City Public Library & NDIA

State Specific Digital Inclusion Resources

Many resources already exist to support your state in implementing the DEA programs as effectively as possible. As follows is a short list that will be updated as we and others develop more resources.

State Digital Equity Scorecard

NDIA's [State Digital Equity Scorecard](#), developed in partnership with Microsoft and the [National Skills Coalition](#), can support states by providing resources to measure, review, and replicate state digital inclusion efforts. The interactive map gives insight into state efforts and the link between unemployment, digital skills, and economic opportunities. The Scorecard is regularly reevaluated and updated to provide states with resources to measure, review, and replicate successful efforts.

NDIA's Asset Mapping Tools

NDIA is developing a suite of asset mapping tools, including a [Digital Inclusion Asset Mapping Guide](#), for states, local governments, digital inclusion coalitions, and digital inclusion practitioners. The guidance and tools are comprehensive, yet simple to implement and flexible enough to accommodate varying geographic scales and levels of detail.

National Broadband Resource Hub

The [National Broadband Resource Hub](#)⁵² (NBRH) is a free, online community for government leaders and nonprofits working to expand broadband access and affordability. The Hub houses a collection of expert broadband resources, including funding guides, policy analyses, how-tos, and more. Through the NBRH help desk, government employees and nonprofit organizations can book free consultation time with experts in broadband policy, funding, and program implementation. The NBRH also serves as a collaborative community platform for local leaders.

Additional Organizations with Helpful Resources

Benton Institute for Broadband & Society

[Benton](#) provides free, reliable, and non-partisan daily digest resources related to broadband developments and policy. These resources include Benton's Daily and Weekly Digest, which break

down and discuss issues related to the BEAD and DEA programs, the Affordable Connectivity Program, and the Universal Service Fund.

Common Sense Media

[Common Sense](#) is a leading provider of bilingual digital literacy resources for families and educators. Common Sense offers a K-12 digital literacy curriculum that is used by 88 percent of Title 1 schools; original research on the digital needs of vulnerable families; and advocacy to promote affordable, future-proof broadband networks and digital inclusion programs. Common Sense harnesses its unique insights on the digital divide at home and in school to help state policymakers create digital equity plans that work for all communities.

Next Century Cities

[Next Century Cities](#) (NCC) engages in outreach to state leaders and participates in state-level regulatory proceedings encouraging collaboration with local leaders on statewide plans and state-specific resources for community leaders seeking to improve broadband access and adoption. NCC elevates local perspectives on broadband policy, highlighting the critical need for processes that invite local officials to the table and provide opportunities for meaningful local policy recommendations. As a conduit of state and local coordination, NCC supports strategies to expand connectivity across regions and promotes inter-governmental collaboration.

Pew Charitable Trusts

[The Pew Charitable Trusts](#) is a global nongovernmental organization that seeks to improve public policy, inform the public, and invigorate civic life. Through efforts like the broadband access initiative, Pew works with state and federal policymakers, researchers, and other partners to accelerate the nation's progress toward universal, affordable high-speed internet service. Pew provides technical assistance to help nonprofit organizations, businesses, and governments make evidence-based policy decisions. Pew analyzes data, develops implementation plans, tailors models to the specific needs of the organizations with which Pew works, monitors progress, and helps interpret results.

Schools, Health & Libraries Broadband (SHLB) Coalition

The [SHLB Coalition](#) is a nonprofit, 501(c)(3) advocacy organization committed to closing the digital divide by promoting high-quality broadband for anchor institutions (CAIs) and their communities. The SHLB Coalition believes in building broadband “to and through” CAIs as a way to provide low-cost connections to the communities surrounding the anchor institutions. The SHLB Coalition, which has regular convenings and serves as an educational resource for its members, can help connect states to CAIs who will play a critical role in digital equity planning and implementation.

Heartland Forward

[Heartland Forward](#) is a nonprofit “think and do” tank focused on changing the narrative about the middle of the country and kick-starting economic growth. Heartland Forward’s Connecting the Heartland initiative is a multi-state initiative (Arkansas, Illinois, Ohio, and Tennessee) to ensure families in the heartland have access to the high-speed, affordable internet service and digital skills necessary for full participation in life in the digital age. Heartland forward provides community broadband planning support to local leaders in collaboration with the Benton Institute for Broadband & Society and state partners. Heartland Forward also supports American Connection Corps fellows in several heartland communities and drives participation in the Affordable Connectivity Program through local awareness and enrollment outreach.