



From:

Angela Siefer, Executive Director  
National Digital Inclusion Alliance  
3000 E Main St  
Columbus, OH 43209  
Digitalinclusion.org

February 6, 2023

Attention:

Yufanyi Nshom  
Office of Workforce Investment  
U.S. Department of Labor  
200 Constitution Avenue NW, Suite C-4510  
Washington, DC 20210

Submitted via email: [DigLiteracyRFI@dol.gov](mailto:DigLiteracyRFI@dol.gov)

Dear Ms. Nshom,

The National Digital Inclusion Alliance (NDIA) respectfully submits these comments in response to the Department of Labor Employment and Training Administration's Digital Literacy and Resilience Request for Information (RFI) released December 8, 2022. NDIA applauds the Department of Labor for prioritizing digital skills and broadband adoption for the future of the U.S. workforce and society.

NDIA advances digital equity by supporting community programs and equipping policymakers to act. NDIA sits in a unique position – we facilitate the nation's largest digital equity community of practice, learning from over 1,100 organizations of local experts, and relaying their lessons learned and community needs to policymakers. Working collaboratively with these organizations who span 48 states, the District of Columbia, Puerto Rico, the US Virgin Islands, and 12 Tribal organizations, NDIA advocates for broadband access, devices, digital skills training, and tech support.

Before we respond to DoL's specific questions, we want to emphasize five vital overarching points:

1. **Holistic strategies should be prioritized.** As long as technology keeps changing, the work of bridging the divide will keep changing. While many solutions exist, permanent solutions must be holistic – the internet must be robust, available and affordable, devices that meet user needs must be available and affordable, and access to ongoing digital skills training and tech support must be available in multiple languages.

2. **Digital literacy and resilience are urgently important for adults and youth across their full lifespans and careers.** Digital skills are not a “one and done” activity that will be completed at the end of a person’s K-12 education or a single job-training course. DoL’s future investments in this area should be guided by the principle that digital skills should be incorporated at every stage of education and workforce development.
3. **Digital skills are dramatically more relevant and powerful when interwoven with other skills.** As educators know well, contextualizing a new skill within the real-world context that a person will use the skill is a highly effective learning modality. Learners are energized and motivated when they see a clear connection to their daily activities and their greater aspirations. DoL should ensure that its investments emphasize this context rather than supporting isolated, stand-alone digital skills classes.
4. **DoL should capitalize on the momentum of organizations that already have expertise in teaching adults and have earned the trust of key populations.** Adult education providers, community colleges, nonprofit workforce development providers and community-based organizations (CBOs), public libraries, and labor unions are among the types of organizations that can offer this valuable expertise. Helping these organizations expand their technical capacity (either independently or through collaborations with partners) is far easier than attempting to build this hard-earned social capital from scratch via new organizations or providers with no history of serving target communities.
5. **The federal government should better coordinate its investments in digital skills** within the federal government and between the federal, state and local governments. For example, The Workforce Investment Opportunity Act (WIOA) funding should rearrange its approach and allow funding to flow through counties specifically for digital skills training programs. Counties nationwide are the stewards of the WIOA dollars in their communities. The fact that digital skills gains still need to be added to the radar is a significant issue when almost all jobs require digital skills.

**An important note,** NDIA suggests DoL reconsider its use of the term ‘digital resilience of individuals’ as the term ‘resilience’ historically places the burden of success on marginalized communities, rather than identifying and solving for systemic problems, and celebrating progress of individuals. It is the responsibility of the systems and programs to be digitally resilient. For the purposes of these comments, we have used the term ‘digital resilience’ in reference to individuals, but look forward to further discussions on a more appropriate term.

**In Paragraph 1(a) of the Notice of Inquiry, the Department of Labor asks how actors in the workforce development system are assessing digital resilience for adult and youth learners.**

A national framework for addressing the full spectrum of digital fluency does not currently exist. To fill in the gap, NDIA’s affiliate, Literacy Minnesota developed the digital skills assessment tool [NorthStar](#) in 2010 and is now used in 2,823 Northstar sites in all 50 states as the standard digital skill assessment tool. Libraries, community colleges, adult basic education, workforce systems, businesses, four-year colleges, healthcare centers, and community-based organizations use it, reaching over 1,123,000 assessments this past year and over 6.7 million total assessments since its inception. DoL should support the continual update of an assessment system such as Northstar’s and ensure funding is available to support the translation of the service into multiple languages.

**In Paragraph 1(c) of the Notice of Inquiry, the Department of Labor asks how actors in the workforce development system are upskilling employees in the workforce, including incorporating digital skills instruction and integrating digital technologies into occupational skills training.**

The DoL should incentivize professional development opportunities to upskill employees in the workforce and for individuals looking to enter the workforce. Our affiliates indicated the most effective digital skill training in professional development workshops include opportunities to work on real-world projects. We recommend the DoL have a holistic, accessible, and flexible approach to workshops on digital skill improvements open to the public.

**In Paragraph 1(e) of the Notice of Inquiry, the Department of Labor asks how actors in the workforce development system are creating and utilizing incentives to engage workers and job seekers in digital learning.**

NDIA's affiliates currently use certifications, digital badging and/or learn-to-own device programs to engage workers and job seekers in digital learning. Digital badging is a program where individuals complete digital skills courses and tests to gain certificates that validate their digital skills improvement. Learn-to-own device programs grant a device by completing digital skills training. Additionally, who is delivering the incentive message matters. Hearing about the incentive from a peer or someone relatable increases the incentive's impact.

Paid apprenticeships incentivize and make professional skills more broadly available to all communities, particularly benefiting individuals who need to earn a living wage while gaining new skills and on-the-job experience. [Bitwise](#), located in Fresno, California, demonstrated the utility of paid, embedded apprenticeships that focus on proactive digital skills acquisition providing over 5,000 community members with an advancement pathway.

**In Paragraph 1(f) of the Notice of Inquiry, the Department of Labor asks how actors in the workforce development system are developing/piloting innovative strategies and promising practices or projects to support digital resilience amongst learners.**

The [Digital Navigator Model](#) is an example of an innovative, holistic strategy meant to support digital resilience among learners. This model assesses a community member's digital inclusion needs—internet, devices, skills—and provides support and additional resources for that resident to address their need, thereby building digital courage and confidence in a community. The digital navigator's model focus on one-on-one and small group support allows learners to work with an experienced guide to identify and target specific gaps in their access and skills, and address them in a timely and responsive manner.

Digital Navigators tailor their support to meet the community and the learner where they are, both physically in their community spaces, as well as starting with their current skill levels, and honoring the skills and knowledge community members bring to each interaction. Digital Navigator programs vary from community to community to meet their unique needs, such as seniors, refugees and new Americans, job seekers, youth, or rural communities.

In Paragraph 1(g) of the Notice of Inquiry, **the Department of Labor asks for some examples of promising practices in the field of digital skills training.**

*Promising Practices:*

- **Digital Navigator programs:** In collaboration with our community, NDIA developed the digital navigator framework. Now, we are expanding and perfecting the framework for rural and tribal areas through the National Digital Navigator Corps (NDNC), and are documenting best practices.
- **Digital Ambassador programs:** for example, the City of Austin's Housing Authority provide free, high quality internet through Google Fiber or guidance on how to register for the FCC's Affordable Connectivity Program, refurbished devices, as well as digital literacy training catered to all ages
- **Learn-to-own device models:** are those where attendance at a set number of digital skills classes over a period of time (ie. 6 weeks, 12 weeks, etc.) is required to earn a free device. This model encourages participation in digital skills classes and continued learning post-program. However, the model is expensive due to the cost of the devices in addition to the compensation for the trainers. As such it's not a universal strategy. Many NDIA affiliates use this model including (but not limited to):
  - [The Digital Equity Research Center in Maine](#)
  - [Kramden Institute in Durham, NC](#)
  - [Tech Goes Home](#) in Boston, MA and Chattanooga, TN
  - [Right Here Right Now](#) in Alamance and Rockingham counties, NC
- **Peer education/partnership:** [Bitwise](#) provides based on empathetic listening. These methods of outreach programs work best because digital navigators are speaking to people in their own communities and take time to hear their neighbors' frustrations and earn their confidence.
- **On-demand learning experiences:** for example, [Tactical Tech's](#) Glass Room uses a virtual experience model for teaching digital privacy.
- **Interactive online courses:** for example, Goodwill Community Foundation Global developed courses on a spectrum of digital skills topics, from computer basics to privacy and security. They include course tracking, and eCoaching, and their materials are available in a variety of non-English languages. Their materials include instructor guides for organizations who wish to adapt their resources for their own purposes.
- **Digital skills modules and assessment tests:** for example, Literacy Minnesota's Northstar program for learners and instructors to measure digital skills development and progress over time.

**In Paragraph 1(j) of the Notice of Inquiry, the Department of Labor asks which library systems and museums we consider exemplars in teaching digital skills and what promising practices these institutions utilize to serve the public.**

Some of the most exemplary library systems with quality approaches to teaching digital skills are [New York Public Library](#) (NYPL), [Denver Public Library](#), and [San Diego Public Library](#), among other [multiple libraries](#) that provide on-demand learning platforms in partnership with organizations interested in supporting workforce development. Other for-profit and nonprofit organizations support libraries and can be valuable partners as libraries advance digital skills for their patrons. For example, [Northstar](#), [DigitalLearn.org](#), [LinkedIn](#), [Digital Skills for Librarians](#)

[with the University of Washington](#), and [Learning Access](#) all support flexible skill development through libraries.

The Denver Public Library has a digital navigators program that highlights one-on-one training and guidance, multi-lingual services, classes and drop-in instruction, self-paced learning, as well as device lending (Chromebook + hotspots) for at-home learning.

The San Diego Public Library has the San Diego Workforce Partnership designed to support career development as a family activity while providing skill assessments, workforce readiness skills, and data and information on in-demand career paths.

[LOUIS - the Louisiana Library Network](#) identified five parishes, three rural and two urban/suburban, to receive additional Digital Navigator training for their local library workers. These library workers focus on individual interactions supporting digital skills, device access, and internet affordability in an effort to broaden the personal and professional opportunities of their community members.

[The Southeastern New York Library Resources Council](#) coordinated the training and deployment of over 100 digital navigators through the suburban and rural regions of the Hudson Valley via the Ramapo-Catskills and Mid-Hudson Library Systems. This program is currently piloting the first digital navigator mentorship model of its kind, promoting the upskilling of library workers to digital navigator status by working with experienced digital navigators to serve community needs.

[The Connecticut State Library piloted a digital navigation program in four libraries](#) throughout their state, serving majority urban populations. The Ferguson, East Hartford, Hartford, and Hamden Public Libraries identified partner organizations serving community members with complex needs. These partnerships included providing digital navigation services to English Language Learners with a local high school, seniors and community elders through senior centers, and recent refugees and immigrants in partnership with a local mosque.

[Morgantown Public Library System](#) (MPLS) in West Virginia recently identified gaps in their own staff's digital skills. To better serve their patrons, MPLS now hosts monthly training and 'challenges' on one specific digital skill they'd like their staff to be equipped with and the staff have the opportunity to earn prizes for completing the challenge.

**In Paragraph 2(a) of the Notice of Inquiry, the Department of Labor asks for the identification of mismatches, needs, and/or systemic barriers for stakeholders involved in digital literacy training and what barriers are individuals (adult and youth workers/learners) experiencing in accessing digital tools and/or training.**

The overarching systemic barrier for stakeholders delivering digital literacy training is the lack of sustainable funding for digital skills programs. Stakeholders cite a lack of funding for their organizations to adequately train instructors to deliver digital skills courses, and an insufficient pay rate for instructors, which results in frequent staff turnover and thus an inability to develop meaningful programs that reflect the needs of their community. Without dedicated staff and the money to sufficiently pay them, stakeholders delivering digital skills training lack the capacity for outreach and community support.

This lack of funding also results in programs that fail to deliver the other components of digital equity such as device ownership and affordable internet access. Learn-to-own programs, a promising emerging practice, incentivizes their learners with device ownership and/or affordable internet. The sustained lack of funding for stakeholders limits their ability to deliver similar services to their communities.

Individuals experience barriers to accessing digital tools and training as well, but the onus must be placed on the organization—which itself lacks funding for meaningful outreach—to properly educate and engage with their community, and not the other way around. Existing programs may not be delivered in a language that is accessible to all learners, which results in exclusion. Stakeholders also note that individuals may not understand the benefits of navigating the internet, and therefore have an inherent mistrust in participating online.

Furthermore, organizations create barriers for participants when they fail to understand their learners' needs and lifestyles. For instance, if digital skills classes at a public library are delivered on weekdays, during the workday, this means learners with a 9-5 job will not be able to attend. Digital skills classes held in-person also pose a restriction for learners who are homebound and/or lack adequate transportation to attend.

**In Paragraph 2(b) of the Notice of Inquiry, the Department of Labor asks for the identification of what challenges instructors and/or training providers face when seeking to deliver digital literacy instruction and training to learners and/or workers.**

Digital skills instructors, while in demand for the skills and experience, are often part-time or contractor roles with low pay. This leads to under-employment and high turnover rates for many digital skills instructors. Building a digital skills program relies on consistent instructors and leadership to build community trust. High rates of turnover detract from the impact of the program. One Connecticut-based library was unable to retain digital navigators for more than a few months during a short, six-month pilot program. The five departing digital navigators cited a deep appreciation for the work and the mission but were unable to make the part-time employment and short-term contract work within their financial and familial obligations. Beyond compensation, these roles also have higher rates of burnout, because they require one-on-one instruction, mental capacity for consistent empathy and patience, and often work with learners in the long term to establish trust. Additional training, such as the secondhand trauma training provided by the [Denver Public Library](#) to their digital navigators, or support structures, such as the internal social worker that holds sessions with direct services staff at the [Enoch Pratt Free Library](#), are necessary to prevent burnout and turnover but require additional and distinct funding.

In addition to the lack of skilled facilitators and trainers, the times, schedules, and locations of many digital skills programs are often not accessible to community learners who are actively employed. Libraries and non-profits offering classes and one-on-one sessions may only provide services during nine to five hours, or may be unable to afford to provide child care, transportation or meals for the learners. Some programs require learners to commit to a consistent schedule, something most shift and wage workers are not provided. Rigid schedules that limit the flexibility of program attendees also create barriers to success, as instructors are not able to provide alternatives to mandatory attendance or requirements for certification or device ownership.

**In Paragraph 2(c) of the Notice of Inquiry, the Department of Labor asks for the identification of common mismatches in digital literacy that employers are facing for newly hired workers as well as incumbent workers.**

Training is available for general software but not for the specific workplace or educational software, limiting opportunities and becoming irrelevant as technologies change. For example, over ten different modules on popular digital skills platforms for basic Microsoft Office skills exist, but very few free courses are available covering warehouse management software, a critical digital tool for workplace mobility in the growing logistics field. In addition, incongruencies between operating system versions and aging workplace or instructional hardware can leave workers behind.

No national framework for addressing the full spectrum of digital fluency exists. Most digital equity work is focused on entry-level skills. However, there are major digital fluency issues at all levels of the technology workforce. Training that is focused on digital skills acquisition, granting individuals the knowledge to explore and the ability to teach themselves, is a goal. Industry software does not currently follow common consumer design patterns resulting in struggles to transfer existing knowledge to workforce software.

**In Paragraph 2(d) of the Notice of Inquiry, the Department of Labor asks for the identification of resources most needed by educators and training providers to address the challenges in providing digital skills training to individuals.**

Educators and digital skills training providers need:

- A national digital skills framework that is kept updated as technology changes and how it is used changes. National leaders such as [Northstar](#) can help with this; instructors in Northstar require evidence-based training before they can teach (EN). Other well-publicized models of quality training and curriculums for adult and youth learners on digital resilience are [DQ Institute](#), [ISTE Standards](#), and [ABE Standards](#).
- Funding for holistic solutions (digital skills, appropriate devices, tech support, reliable and robust connectivity).
- Funding to train and support the digital skills trainers and digital navigators. NDIA urges the DoL to evaluate and fund promising digital navigator and "train the trainer" models.

**In Paragraph 2(e) of the Notice of Inquiry, the Department of Labor asks for the identification of challenges faced by training program participants (adult and youth), and the identification of mismatches in the digital literacy ecosystem ( i.e., public school systems, libraries, employment service centers, etc.)**

Technology training programs and classes are often developed without community input, instead are based on what instructors or funders want to teach or believe community members should learn. This leads to courses that offer skills either too basic (intro classes) or too advanced (coding) without regard to community needs. The lack of a holistic approach to introducing new communities to digital skills may be overly focused on rigid specific areas (workforce or job seeking) versus community interests, such as community building, communication, and recreation. Other challenges include the lack of wrap-around support for transportation and/or childcare, lack of capacity in training programs for mental health and

disability needs, and inability to accommodate work schedule incompatibility or expectations of community members to agree to long-term commitments.

NDIA urges the DoL to include community input in creating programs for their communities, focusing on holistic and inclusive approaches that acknowledge cultural and lifestyle differences toward access to digital resilience.

**In Paragraph 2(f) of the Notice of Inquiry, the Department of Labor asks for the identification of challenges or barriers local entities face when attempting to use new or existing funding to support digital literacy training for learners.**

Two main challenges exist: organizational capacity and sustainability. This leads to resistance to short-term funds and a low capacity to execute goals. Organizations work hard to create consistency and trust in their communities. Short-term funds vanish rapidly as the programs become more successful, often abandoning communities midway through their apprenticeships.

A lack of consistent messaging and outreach to underserved communities has led to the perception that digital skills and frameworks are not critical to success. Communities new to digital skill improvement are also more likely not to be aware of the resources available to them—highlighting partnership gaps in digital inclusion ecosystems that are not well-connected. This results in overlapping work or a lack of appropriate assessments and referrals.

The Workforce Investment Opportunity Act (WIOA) funding needs to rearrange its approach and allow funding to flow through counties specifically for digital skills training programs. Counties nationwide are the stewards of the WIOA dollars in their communities. The fact that digital skills gains still need to be added to the radar is a significant issue when almost all jobs require digital skills.

**In Paragraph 3(a) of the Notice of Inquiry, the Department of Labor asks to know what additional resources are needed for workers of all backgrounds to access and succeed in digital literacy upskilling/training opportunities.**

Similar to the note above, WIOA needs to recognize that digital skills attainment is a measurable skill gain. Currently, digital skills attainment does not fit in Title II within education skills that can be measured. WIOA funding is very standardized, and although it ensures all people can get foundational digital skills for job training, several additional resources would benefit the national workforce. More funding to develop digital skills programming in various languages and for adults, basic education, and literacy programming should be built into governmental and private funding streams. Funding for Disability Community and Workforce Development/Digital Skills (Unique Needs) should be prioritized. And a better and strong campaign for visibility should be explored. Digital skills are necessary and are a digital health and public issue if not dealt with. Successful digital implementations will ensure that apprentices get the protections and benefits of working in digital skill improvement while being incentivized to stay to support their communities in community-building projects.

**In Paragraph 3(b) of the Notice of Inquiry, the Department of Labor asks how programs can ensure underserved and/or marginalized populations are adequately targeted for digital literacy training opportunities.**

To ensure underserved and marginalized populations are included in digital skills training opportunities the following needs should be addressed:

- Ensure sufficient funding for all aspects of the program that make it possible for underserved and marginalized populations to attend (ie. transportation, childcare, food, etc.)
- Provide adequate compensation and support for trainers
- Create partnerships with community organizations, faith-based organizations,
- Providing programs in languages specific to a given community to ensure underserved and marginalized populations are included in digital literacy training opportunities.

Programs that are co-designed with input from community members ensure content is uniquely designed to community needs and interests. Other programs that should be considered focus on establishing physical infrastructures, such as public computer centers within underserved/marginalized communities, co-developing programs with residents and community organizations, and by utilizing demographic information and localized workforce research to identify who in the community to partner with.

Significant barriers to digital literacy training opportunities for formerly incarcerated individuals also exist. New York City passed the [Ban the Box Law](#), which prohibits employers from asking about criminal history or conducting a background check until a job offer is made. This condition removes an important barrier to digital opportunity for formerly incarcerated individuals.

**In Paragraph 3(c) of the Notice of Inquiry, the Department of Labor asks how digital skills/literacy efforts can be integrated into ongoing worker preparation programs.**

Funding professional organizations and unions to provide digital literacy training as part of their professional recruitment programs and including digital literacy in DoL initiatives can integrate digital skills/literacy efforts into ongoing worker preparations.

**In Paragraph 3(d) of the Notice of Inquiry, the Department of Labor asks to know what interventions/supports can be utilized to support digital inclusion for all program participants.**

Digital Navigators provide service for all types of program participants whose needs vary widely. If systems and partnerships are in place, they can collaborate with healthcare, social services, and other wrap-around services to ensure basic needs are met before engaging in digital skills training and developing universal or formal digital skills training for community members with disabilities will support inclusivity.

DoL asks if there are issues centered around digital literacy resources being made available in Spanish and other widely-used languages in addition to English. Evidence-based practices developed to inform how to teach ELL digital skills must be implemented, considering the predominant languages spoken in each community. Northstar's Digital Skills Program is expected to be fully translated into Spanish by the summer of 2023.

**In Paragraph 3(e) of the Notice of Inquiry, the Department of Labor asks how the Institute of Museum and Library Sciences should better encourage digital skills development in libraries and museums.**

The Institute of Museum and Library Sciences (IMLS) should continue and expand funding for the establishment and expansion of digital skills programs for library and museum systems throughout the U.S. Digital skills programming is an essential service that libraries and museums are uniquely positioned to provide. IMLS has long supported these initiatives and should continue and expand its dedication to supporting the implementation of best practices and innovative programs.

**In Paragraph 4(a) of the Notice of Inquiry, the Department of Labor asks how the most successful partnerships are structured and if they are required.**

Digital Inclusion Coalitions, such as those that include community based organizations, foundations, community partnerships, library systems, municipal departments (i.e., workforce, education), research partners (university, community college), and business partners (i.e., healthcare, banks) are successful partnerships and can support the development of a digital skills systems throughout communities.

Some of the most successful partnerships have designated and clearly communicated onboarding points for accessing services, such as digital navigators that service across all participating organizations. In New York State, [CanCode](#) produced a Communities model which receives funding for the New York State Office for New Americans for Digital Skills training for the immigrant and refugee populations. Open to anyone in NYS who is an immigrant or refugee. CanCode also partners with The State University of New York and The City University of New York systems to provide certificate programs for digital skills across the digital fluency spectrum, such as Basic Computer Training, Front End Web Development, Python for Data Analytics, JavaScript Fundamentals, and Quality Assurance Engineers.

**In Paragraph 4(b) of the Notice of Inquiry, the Department of Labor asks to know the barriers preventing successful partnerships with business and industry partners at the state and/or local levels and what support is needed to overcome them.**

Lack of knowledge, education on digital equity, low capacity in business and community leaders and lack of funding for project manager positions are some of the barriers preventing successful partnerships at the state and local level.

We urge the DoL to create solid digital skill plans and programs that incentivize partnerships and strategies catered to the local and state level.

**In Paragraph 4(c) of the Notice of Inquiry, the Department of Labor asks to know the specific digital skills that workforce and education training providers should be responsible for teaching learners, such as how to type or navigate digital devices.**

As previously noted, a national framework for addressing the full spectrum of digital fluency does not exist. We need a national standardized yet adaptable framework that assesses the

digital skills needed for each occupation and provides the appropriate training and support where needed.

**In Paragraph 5(a) of the Notice of Inquiry, the Department of Labor asks to know which existing federal programs/federal funding sources are being utilized to support digital resilience.**

The Lifeline program, the Affordable Connectivity Program, and programs established by states, local governments, and non-profits with funds from the American Rescue Plan Act (ARPA), CARES act and Consolidated Appropriations Act (CAA) of 2020 support digital resilience. Soon, funding from the Infrastructure Investment and Jobs Act for the Digital Equity Act (DEA) and, to a lesser extent, the Broadband Equity, Access, and Deployment (BEAD) Program will support digital skills training.

**In Paragraph 5(b) of the Notice of Inquiry, the Department of Labor asks whether additional federal funding is needed for state/local governments to facilitate better services to the public.**

Yes, additional federal funding is needed for state and local governments to facilitate better services and to support national digital literacy attainment efforts. Organizations attempting to support their communities in workforce development through digital skills improvement are overwhelmed by its high demand. Yet, these organizations have little funding for staff, systems, and devices to properly meet the demands.

Additional funding for state and local governments would improve employment and offer apprenticeships within communities that need these services, improving services for historically disconnected communities while providing and improving employment.

In addition, additional funds are needed for community-based organizations and nonprofits who deliver digital skill services and programs.

**In Paragraph 5(c) of the Notice of Inquiry, the Department of Labor asks what types of technical assistance and resources would be most valuable to build digital resilience capacity.**

The Digital Equity Act does not grant enough funding for implementing long-term systemic solutions that support progressive skill development for all skill levels. Permanent solutions are critical to addressing digital skill demands by allocating continued funding for on-the-ground, person-to-person, innovative support that ensures those who need these programs can access them.

DoL should create internal policies that incentivize digital skill improvement within all its workforce development initiatives. These initiatives should establish permanent systems that empower community-based organizations, granting them the financial independence and partnership support necessary for successful outreach to communities, the provision of digital skills training and device ownership.

**In Paragraph 5(e) of the Notice of Inquiry, the Department of Labor asks to know how federally-funded workforce and education training programs work together to ensure that participants (adult and youth) receive needed training in foundational and occupation-specific digital literacy skills.**

DoL has a great opportunity to serve the U.S. workforce development system by establishing a nationwide digital skills training model similar to the HeadStart or YouthBuild model, that implements and incentivizes digital skill training and certifications for all.