



**Before the
National Telecommunications and Information Administration
Washington, DC 20230**

In the Matter of)	
)	
Digital Equity Act Request for)	Docket No.: NTIA-2023-0002
Comments)	
)	

COMMENTS OF NATIONAL DIGITAL INCLUSION ALLIANCE

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Introduction

The Digital Equity Act is a once-in-a-generation opportunity to design systems that will enable true digital equity to be achieved. 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. More than ever, we can affirm that digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services. The \$65 billion investment in digital equity and broadband through the Infrastructure Investment and Jobs Act (IIJA)¹ is the largest investment in digital equity and broadband in US history. If implemented with the understanding that the digital divide is a long-term, evolving problem, this investment could result in the development and implementation of systemic digital equity solutions. If the Digital Equity Plans and their subsequent implementation establish sustainable programs within strong digital inclusion ecosystems, the United States will be prepared to quickly address new digital inequities as they arise.

Robust, comprehensive programs that address the human side of the issue in addition to the technical side 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.

The National Digital Inclusion Alliance (NDIA) prioritizes equity. This means we support digital inclusion work that prioritizes people who have been left behind in the digital age. NDIA sits in a unique position – we facilitate the nation's largest digital equity community of practice, learning from over 1,200 organizations of local experts, and relaying their lessons learned and community needs to policymakers. NDIA bridges the community of digital inclusion practitioners and policymakers, serving as a unified voice advocating for broadband access, devices, digital skills training, and tech support. Working collaboratively, NDIA identifies, crafts, and disseminates resources and tools to help community-based digital inclusion programs increase their impact and serve those most impacted by the digital divide. While universal, the digital divide disproportionately impacts disadvantaged communities and individuals, particularly people of color and people experiencing poverty. NDIA's more than 1,200 affiliates in 49 states, the District of Columbia, Puerto Rico, and the US Virgin Islands serve these populations. The work of these affiliates informs the following recommendations and, if implemented, would ensure the programs funded or established through the Digital Equity Act make significant progress in advancing digital equity across the country.

The historic investment from the Digital Equity Act is amazing but will not fully bridge the digital divide. As long as technology keeps changing, the work of bridging the divide will keep changing. There are many solutions – affordable, robust broadband; affordable devices that meet user needs; and access to ongoing digital skills training and multilingual tech support.

¹ Infrastructure Investment and Jobs Act, codified at 47 U.S.C § 1701-1754 (2021).

The broad goal of this historic investment in digital equity should be systems-level change and create systems-level change and strong local, regional, and state digital inclusion ecosystems that allow us to continually adapt as technology changes.

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

1. The entire DEA planning process and its implementation should be based on meaningful community engagement, collaboration, and partnership. States, territories, and DC should already be engaging, collaborating with, and listening to lived experts, partners, and stakeholders frequently and that engagement should continue throughout implementation.
2. Success (for both the capacity grants and competitive grants) should be defined by the grantees. NTIA should provide support, guidance, technical assistance, tools, and best practices, but the grantees should define what success looks like in their communities and determine how to get there.
3. NTIA should support grantees throughout the grant process by making sure the grant applications and requirements are simple and accessible, the grant application and reporting platform is user-friendly and intuitive, and by providing opportunities for grantees to gather and learn from each other's best practices and tips.
4. The capacity and competitive grants should be flexible and allow for grantees to pivot or adjust approaches and deliverables based on lessons learned along the way.
5. NTIA should design the program to strike a healthy balance of investing in programs, organizations, and models that are proven to be effective while also providing space for innovation and expansion of the field.
6. Investing in establishing new digital inclusion coalitions and adding capacity to existing ones will support the growth and sustainability of healthy digital inclusion ecosystems throughout the U.S.

Question 1

Question 1, Sub-Question 1

During the public comment period for the States' Digital Equity Plans, what guidance should NTIA and/or each State provide to enable communities to review and provide actionable feedback to States regarding their State Digital Equity Plans?

All 50 states, DC, and US Territories (hereafter referred to as "Administering Entities") received (some or all of) their digital equity planning grant funds by the end of November 2022, yet each are at a different stage in their planning process. As of the date of our submission of these comments, some Administering Entities will soon (within the month) post their plans for the

required 30-day public comment period. Others will not be ready to do so until August or September 2023. Regardless, should NTIA develop guidance or requirements for the public comment process, NTIA should make it available as soon as possible so the Administering Entities can incorporate the guidance into their project plans.

NTIA can support engagement in the public comment process by leveraging its marketing and outreach resources to publicize each state/district/territory plan, creating awareness, and hosting the plans on their website as they're made public. NTIA could make templates and tools available for Administering Entities to use for soliciting comments. NTIA could also provide guidance and tips for community members to provide input and what to look for when doing so.

For the Administering Entities, the entire DEA planning process and its implementation should be based on meaningful community engagement, collaboration, and partnership. Administering Entities should engage, collaborate with, and listen to partners and stakeholders throughout the entire planning process, implementation, and evaluation.

The required 30-day public comment period is an additional opportunity for Administering Entities to *continue* their meaningful engagement, build trust, and gather additional input and expertise. The public comment period should not be the only time Administering Entities interact with their communities – instead, it should be a gut-check. If they co-create the plan with the covered populations, stakeholders, and partners, then the plan should already reflect barriers they identified to digital equity and solutions.

To ensure community members are aware of and able to participate in the public comment process, Administering Entities should publicize in advance: (1) the date the plan will be available for public comment, (2) where and how the public can access it, and (3) how the Administering Entities will accept feedback.

The Administering Entities should create a simple and accessible form for the public to provide public comment. They should publish the plan and the form online and email the digital version of the plan and form (multiple times throughout the 30-day window) to partners, stakeholders, and residents they engaged throughout the process. They should provide printed copies with printed forms and instructions for completing them to partners to make available at physical locations (i.e. libraries, community anchor institutions, community-based organizations, places of worship, etc.) for public review. As with gathering initial stakeholder and partner input, they should attempt to go where people are and actively engage with communities. They can present major findings and implementation strategies at these locations, along with a projected timeline for the plan's implementation and offer multiple methods for receiving input. As outlined in the authorizing legislation, the Administering Entities should also bear the burden of proof to show how input is incorporated into the plans.

Simultaneously, Administering Entities should prioritize seeking and incorporating input from American Indian Tribes, Alaska Native entities, or Native Hawaiian organizations, hereafter referred to as 'Tribal Entities', through both the public comment process and other means. Remembering that not every Tribal Entity is reachable online, they should ensure Tribes receive the plan with plenty of time to provide comments and feedback and clear instructions on how to

do so. In addition, Administering Entities should consider providing an opportunity for Tribal Entities to formally approve the plan via a formal letter (on Tribal letterhead) or a signatory process of some kind.

Section 60304(c)(2)² describes the requirements Administering Entities must meet during the public comment process as the following:

(i) before submitting the application—

(I) consider all comments received during the comment period described in subparagraph (A) with respect to the application (referred to in this subparagraph as the “comment period”); and

(II) make any changes to the plan that the Administering Entity determines to be worthwhile; and

(ii) when submitting the application—

(I) describe any changes pursued by the Administering Entity in response to comments received during the comment period; and

(II) include a written response to each comment received during the comment period.

Administering Entities should design their comment period plan to ensure they meet all of these requirements, and NTIA should enforce these in their plan review.

Question 1, Sub-Question 2

What criteria/factors/outcomes should communities focus on in their review?

Administering Entities and NTIA should encourage community members, partners, and stakeholders to focus their feedback on their interests, subject matter expertise, and areas of the plan that impact them most. Administering Entities and NTIA should provide clear instructions and guidance for comment submission in plain language for commenters.

Question 1, Sub-Question 3

How can NTIA ensure that States/Territories consult with Tribal entities about how best to meet Tribal members’ needs? NTIA would like to learn from stakeholder experiences to inform the development of technical assistance resources to support applicants’ efforts to identify successful project models, partnerships, activities, and strategies that deliver impactful and sustainable outcomes. In implementing the Bipartisan Infrastructure Law’s programs, NTIA will offer technical assistance to all applicants and prospective sub-grantees. As a statutory requirement, these entities must evaluate the impact of funding projects on Covered Populations from the implementation of the Digital Equity Plans.

NTIA should ensure that Administering Entities consult with Tribal entities by clearly outlining and defining a process and standards for meaningful Tribal consultation. NTIA should then train Administering Entities on the process and hold them to these standards. NTIA should simultaneously provide information on the consultation standards and process and give instructions on how to report to NTIA if those requirements were not met. The consultation

² Infrastructure Investment and Jobs Act, § 60304(c)(2), codified at 47 U.S.C. § 1723(c) (2021).

process should be ongoing and consistent. Formal consultations are essential not just as a response to the grant opportunity but to establish working partnerships among states, territories, and Tribes that live beyond the grant period. A true working partnership would support community building and collaboration to jointly address digital inequities. The formal consultations should include education for Tribal leaders about the requirements for consultation, the intentions, and the potential outcomes of the plans (i.e. information on Capacity awards and how they will be implemented). They should also include information about the 30-day comment period. When possible, Administering Entities should engage Tribal leadership in person.

Plans and instructions for comments should be provided via both online and offline methods to Tribes. Tribes should understand that if the feedback they give during consultation is not incorporated in the plan, they can report that during public comment. During the review period, NTIA should contact each Tribe that is listed as a key partner in the plan and ensure the required formal consultation process was followed.

Many Tribal communities and leaders are not aware of the DEA programs, the planning process, or when opportunities are available to comment on processes or strategies. Few people are engaged in digital equity work in Tribal communities and capacity is limited. Both Administering Entities and NTIA should provide more opportunities for engagement and education about the DEA programs, processes, and opportunities. When engaging Tribes, Administering Entities and NTIA should conduct outreach to other entities beyond the official Tribal government representatives, such as health clinics, schools, Tribal owned and/or operated internet service providers (ISPs), and elder centers. Administering Entities and NTIA should approach and engage Tribal-owned and/or operated ISPs differently than non-Tribal ISPs because of their unique role in delivering digital inclusion programs in their communities.

Administering Entities should consult with state-recognized Tribes.

Question 2

Question 2, Sub-Question 1

Over the next year, NTIA will deliver technical assistance for States and Territories to develop holistic, actionable, and impactful State Digital Equity Plans. NTIA has created a Needs Assessment Guide, Asset Mapping Guide, Digital Equity Plan Guidance, Best Practices, Workforce Planning Guide, webinars, and other technical assistance resources. What additional guidance/resources should NTIA provide to States, Territories, and Tribal entities as they develop their Digital Equity Plans?

NTIA should provide specific, tailored resources and technical assistance to states, territories, and Tribal entities as they develop, implement, and evaluate their Digital Equity Plans, as they all have unique circumstances, geographies, histories, and needs. For instance, working with Tribal lands is very different from working with municipalities, and the resources NTIA creates should reflect those differences. For the same reasons, NTIA should provide specific, tailored resources regarding each covered population.

NTIA should anticipate and provide resources in advance of needs that will arise for the Administering Entities as they finish compiling their Digital Equity Plans and move into implementation and evaluation. NTIA should provide a model template to Administering Entities for collecting public comment. In addition to identifying and sharing best practices, NTIA should also identify and share lessons learned to reduce the replication of strategies or methods that did not have the intended impact.

Question 2, Sub-Question 2

What additional guidance can NTIA provide to help States and community organizations utilize other federal tools to close the digital divide by increasing access and reducing cost like the Affordable Connectivity Program?

NTIA should continue to coordinate with other federal agencies managing digital equity and broadband funds and programs, and ensure that all NTIA staff are well equipped to route questions or provide guidance to Administering Entities or community-based organizations participating or seeking to participate in these programs. Where they do not already exist, through the Federal Program Officers, NTIA should provide personal connections and introductions for the Administering Entities to staff operating digital equity and broadband programs at other Federal agencies, such as the Federal Communications Commission, US Department of Agriculture, and US Treasury. Additionally, NTIA should provide Administering Entities with a menu of best practices for aligning the Digital Equity Plans and Broadband Equity Access and Deployment (BEAD) plans and specifically address the potential of the BEAD program to address affordability through the required low-cost plans³ and programs like the Affordable Connectivity Program (ACP).

Question 2, Sub-Question 3

Individuals and communities who are most impacted by the digital divide are in the best position to help States, Territories, and Tribal entities understand the inequities and how best to focus and scale local efforts. How can individuals and communities provide feedback to States, Territories, and Tribal entities to ensure their unique communities' needs are solicited, considered, and reflected in the Digital Equity Plans?

Lived experts are members of covered populations, particularly individuals from historically disconnected communities with direct, lived experiences of the digital divide. A robust planning and community engagement process will meaningfully engage lived experts to help craft and identify meaningful engagement strategies, analyze and contextualize data, and co-create implementation strategies. We agree that lived experts are best suited to help Administering Entities truly comprehend the current state and impacts of the digital divide in their communities. However, for all Administering Entities (with exception of the territories) the planning process – including the required community engagement process – is already underway. We do not suggest adding retroactive requirements for the Administering Entities for developing their plans. Rather, we encourage NTIA to enforce and evaluate the quality of the meaningful community engagement in their review of the plans as established under the Digital

³ NTIA, Notice of Funding Opportunity: Broadband Equity Access and Deployment Grant Program (NTIA-BEAD-2022, 11.035) Section IV(C)(2)(c)(i)

Equity Planning grant NOFO⁴ and law⁵. To do so, NTIA should develop a set of metrics for determining how meaningful the community engagement was. They should also provide examples, templates, tools, and best practices for the Administering Entities on how to conduct and continue meaningful engagement throughout the planning, implementation, and evaluation periods.

NTIA should create a rubric for scoring the Digital Equity Plans and assess whether each Administering Entity met each requirement as established under the law. For example, each measurable objective⁶ should address each of the barriers to digital equity for each covered population. Then, the stated implementation strategies should be designed to achieve these measurable objectives.

In NDIA's State Digital Equity Plan Toolkit⁷, we provide extensive guidance and best practices for Administering Entities to ensure their unique communities' needs are solicited, considered, and reflected in the Digital Equity Plans. In addition to the guidance provided in the Toolkit, we also suggest Administering Entities and NTIA seek feedback and input from communities via outlets or means they are accustomed to and prefer using. For example, many Alaskan Natives regularly use and interact with each other through Facebook. Thus, in Alaska, Facebook could be a powerful tool for gathering feedback on the plan and creating a robust feedback loop for implementation. Administering Entities and NTIA should identify platforms and opportunities like this to solicit ongoing feedback from distinct audiences.

Question 3

Question 3, Sub-Question 1

How should NTIA define success for the Capacity Grant Program?

As a whole, the Digital Equity Act is the first legislation to directly invest in digital inclusion activities and simultaneously invest in building digital equity capacity in every state/district/territory and federally recognized Tribal entities. Since it is the first program of its kind, achieving universal digital equity through the Digital Equity Act alone is not a reasonable expectation, nor was it Congress' intent.

Congress stated that the purpose of the State Digital Equity Capacity Grant Program is threefold⁸: 1) promote the achievement of digital equity, 2) support digital inclusion activities, and 3) build capacity for state/district/territory/Tribal efforts that support broadband adoption amongst their residents. While digital equity is our collective ultimate goal, success for the Capacity Grant Program should not be defined by reaching universal digital equity. Instead, NTIA

⁴ NTIA, Notice of Funding Opportunity: State Digital Equity Act Planning Grant Program (NTIA-DE-PLAN-2022, 11.032) Section IV(C)(1)(b)(ii)(4)

⁵ Infrastructure Investment and Jobs Act, § 60304(c)(1)(E), codified at 47 U.S.C. § 1723(c) (2021).

⁶ NTIA Notice of Funding Opportunity: State Digital Equity Act Planning Grant Program (NTIA-DE-PLAN-2022, 11.032) Section IV(C)(1)(b)(i)

⁷ Amy Huffman et al., *State Digital Equity Plan Toolkit* (National Digital Inclusion Alliance, 2022), p. 10-23

⁸ Infrastructure Investment and Jobs Act, § 60304(a)(1)(A), codified at 47 U.S.C. § 1723(a) (2021).

should define success as:

- 1) Administering Entities make progress toward their stated goals. All activities funded and investments made through the Capacity Grant Program are aimed at supporting the ultimate goal of achieving digital equity.
- 2) States, DC, territories, and Tribal Entities establish the capacity to provide and sustain leadership, expertise, and resources to foster digital equity ecosystems⁹ throughout their state/district/territory/Tribal lands.
- 3) All state/district/territory/Tribal efforts enabled by the Capacity Grant Program support broadband adoption and digital equity for their residents.

Due to the previous lack of funding and awareness of digital equity as an issue, it was necessary to “shoehorn” digital inclusion activities into other programs and present them as a means to some other end, such as workforce outcomes, increased access to healthcare, or educational attainment. However, because the Digital Equity Act is aimed at promoting digital equity, all indicators of success can and should center digital equity as a stand-alone fundamental need. Similar to nutrition or housing, the value of which is not pre-conditioned on achieving other social outcomes, digital equity is itself an outcome worth achieving. Connections to other areas remain critical, but for the first time, digital equity is itself prioritized in federal funding on its own merits, and the success of each program – including the Capacity Grant Program – should be designed to measure progress towards digital equity.

Question 3, Sub-Question 2

What outcomes are most important to measure?

Outcomes should align with goals outlined in the Digital Equity Act (see above) and the measurable objectives the Administering Entities outline in their plans. Success for all Capacity Grant Program awards should be defined by Administering Entities’ stated vision for digital equity and measured by evaluating progress towards the measurable objectives outlined in the Digital Equity Plans.

Question 3, Sub-Question 3

How should NTIA measure the success of the Capacity Grant Program, including measures and methods?

To measure the overall success of the State Capacity Grant Program, NTIA should conduct an assessment of all Digital Equity Plans to identify comparable needs, goals, and measurable objectives across the plans. In addition to identifying consistent measures across plans, this assessment would help NTIA identify unique and innovative measures that could be scaled to the entire program.

Sustainability is a critical feature of success – investing in capacity across different organization types will also help ensure sustainability by protecting against shifts in funding and policy priorities in government or at certain organizations. This will require the Capacity Grants

⁹ See Amy Huffman, *Defining a State Digital Equity Office* (National Digital Inclusion Alliance, 2021) <https://www.digitalinclusion.org/defining-a-state-digital-equity-office/>

to be flexible, as program evaluation metrics may need to be evaluated throughout the life of the grant to determine if adjustments should be made.

Question 4

How should NTIA design the Capacity Grant Program to ensure equity is achieved? Please explain. NTIA encourages stakeholders to provide the rationale for their comments, including available examples of studies, measures, outcomes, assessments and supporting information.

The Capacity Grant Program will support efforts toward digital equity but will not achieve digital equity. We encourage a realistic expectation of what this program can achieve. To make significant progress toward digital equity, the Capacity Grant Program must be centered on equity. Given the scale and diversity of digital equity needs among the covered populations, the natural inclination may be to encourage wide-reaching programs (such as a statewide outreach program for the Affordable Connectivity Program) that address barriers for all covered populations. However, NTIA should ensure such cross-cutting strategies are balanced with implementation strategies that address specific challenges for certain covered populations. To achieve the intent of the Digital Equity Act, the Capacity Grant Program must also support these more resource-intensive solutions that might otherwise be cost prohibitive to implement.

Additionally, the Capacity Grant Program will make progress toward equity by building the capacity of local organizations already trusted by the covered populations.

In addition to federally-recognized Tribes, state-recognized Tribes should be consulted. State-recognized Tribes should also be eligible for grants from the state, since they do not qualify for federal funds.

Question 5

Question 5, Sub-Question 1

What criteria/factors should NTIA take into consideration when assessing whether States, Territories, and Tribal entities are meeting the stated goals of their Digital Equity Plans?

NTIA should use the measurable objectives outlined in each Digital Equity Plan to evaluate how Administering Entities are meeting their stated goals. If the Administering Entity satisfied the meaningful community engagement requirements, the measurable objectives will reflect stakeholder input and the diversity of each population. The measurable objectives should serve as the baseline criteria for measuring the plan's progress. NTIA should also evaluate the Administering Entity's plan for sustaining community engagement throughout the implementation phase to ensure the plan continues to serve each covered population. To promote this accountability, NTIA should determine whether the Administering Entity has a process for documenting community perspectives on the plan's progress. Feedback opportunities should also consider accessibility and availability (i.e. Will the Administering Entity make a feedback form that's available in the spoken languages within its jurisdiction? Will the Administering Entity interact directly with the covered populations to learn how the programs serve, or don't serve, them?).

Question 5, Sub-Question 2

How should NTIA measure each Digital Equity Plan's progress in the short-term (one year or less) and long-term (two or more years)?

The Digital Equity Plan's measurable objectives should also guide NTIA's evaluation of long-term and short-term progress. Long-term targets should fully address a goal or barrier to digital equity for one or more covered populations, while the incremental targets should represent progress along the way. In other words, NTIA should use the measurable objectives to evaluate the Administering Entity's long-term targets in the Capacity Grant Program, while incremental targets should evaluate strategies, tactics, and subgrants deployed under the Capacity Grant.

Question 6**Question 6, Sub-Question 1**

What reporting requirements should NTIA establish for grantees to ensure that the voices of those most impacted by the digital divide are reflected in the implementation and updates of the Digital Equity Plans?

NTIA should establish flexible reporting requirements, allowing for both quantitative and qualitative data. In addition, to the extent NTIA requires a specific format for the data, such formatting and requirements should be clearly described in the NOFO requirements (e.g. when, or if, an IRB is needed, and guidance for that process) so applicants are well aware of the reporting requirements prior to their application.

To ensure the voices of those most impacted by the digital divide are reflected in the implementation and concurrent program reporting and evaluation, NTIA should encourage grantees to continue using data collection methods used in the planning process. In particular, primary data gathered through listening sessions, focus groups, one-on-one interviews, community surveys, and other public engagement methods should be repeated periodically during the Capacity Grant Program implementation and beyond. This will ensure that data used to measure implementation is comparable to data used to identify and quantify covered populations' needs and barriers. It will also ensure that those who most directly experience digital inequities continue to play an important role throughout implementation and impact measurement. Because these data collection efforts are time- and labor-intensive, NTIA should ensure such activities fall under allowable expenses. NTIA should provide guidance for and encourage the Administering Entities to allocate a portion of their Capacity Grants to support ongoing data collection and evaluation, ideally by local digital inclusion practitioners and researchers.

Question 6, Sub-Question 2

What steps, if any, should NTIA take to monitor and evaluate implementation practices?

NTIA should require Administering Entities to periodically report information gathered through community digital equity surveys. Regular reporting throughout implementation should also track trends and outcomes to determine if grantees are meeting their stated measurable

objectives. NTIA should collect a mid-year report and annual report and not collect quarterly reports, which can be overly burdensome. To support the success of grantees, NTIA should provide templates, guidance, and support for Administering Entities to help them collect data more frequently – at a minimum monthly – on Digital Equity Plan implementation.

To supplement written reports, NTIA should provide digital inclusion practitioners, Capacity Grant subgrantees, and members of the covered populations opportunities for direct conversations with NTIA throughout the grant period. Through these conversations, stakeholders and partners can give formative feedback and communicate new learnings from the implementation process, while also providing additional accountability for the Administering Entities.

Question 6, Sub-Question 3

From a sustainability perspective, what role can collaborations, partnerships, and coalitions play? Please share examples of any existing impactful collaborations, partnerships, and/or coalitions. The Assistant Secretary is allowed to prescribe such rules as may be necessary to carry out the Capacity Grant Program.

One way to promote sustainable programs is to institutionalize best practices discovered during the grant period. In some cases, the Administering Entities or sister agencies may be a natural fit to support and sustain programs started with Capacity Grants that should continue beyond the life of the specific grants. For example, a state department of aging or department of social services can integrate aspects of the Digital Equity Plan into its overall department goals. Administering Entities should continue to ensure that state/district/territory/Tribal agencies are responsive to the communities they aim to serve through digital inclusion efforts, and should coordinate across agencies and share lessons throughout the implementation process.

Digital inclusion coalitions and local partners also play a valuable role in implementation and sustainability efforts, and their role extends beyond providing direct programming. Coalitions are well-positioned to provide a real-time pulse for trends and best practices on the ground and are key partners in program evaluation. They can skillfully identify and share successful practices, highlight areas for improvement, and assess impact. They also have the ability to push the development and implementation of Digital Equity Plans down to the local levels.

Effective digital inclusion coalitions leverage the diversity, expertise, and capacity of a variety of different member organizations. NDIA estimates that 86 digital inclusion coalitions (local, regional, and statewide) currently exist across the country. For example, the Franklin County Digital Equity Coalition includes members from government, education, healthcare, social services, and the private sector¹⁰. The Digital Inclusion Alliance of San Antonio, Texas, convenes nonprofits, governments, businesses, public education systems, higher education systems, internet service providers, and media outlets to promote digital inclusion initiatives¹¹. Coalitions and partnerships existed prior to the Digital Equity Act programs and will be vital for the

¹⁰ Franklin County Digital Equity Coalition, April 17, 2023, <https://franklincountydigitalequity.org/>.

¹¹ "Digital Inclusion Alliance – San Antonio," Digital Inclusion Alliance – San Antonio, accessed May 1, 2023, <https://digitalinclusionsa.org/>.

continuation of digital inclusion efforts beyond the grant period. Investing in new digital inclusion coalitions and adding capacity to existing ones will support the growth and sustainability of healthy digital inclusion ecosystems throughout the US.

Question 7

What rules, if any, should the Assistant Secretary develop to ensure that digital equity is achieved in the Capacity Grant Program?

The investments made through the Capacity Grant Program should aim to support the ultimate goal of achieving digital equity. Though, as we previously discussed, the Digital Equity Act programs alone will not be enough to achieve full digital equity.

Trust is a significant barrier to technology adoption and use. Administering Entities should require subgrantees to provide evidence that they are operating with the trust of covered populations.

NTIA should encourage Administering Entities to appropriately balance investments in local digital inclusion programs and statewide programs. Considering that digital inclusion activities are inherently local and trust is usually built at the local level, NTIA should require Administering Entities to allocate a minimum percentage of the subgrants to locally-based organizations. In rural areas, “local” may be better defined as “regional.”

To ensure Capacity Grant funds stay local, as was Congress’ intent when they indicated that any subaward should go to organizations located in the state¹², we encourage the Assistant Secretary to establish mechanisms that ensure this intent is upheld.

NTIA should also not permit Administering Entities to require matching funds or prioritize applications from sub-recipients or subgrantees. Requiring a financial or in-kind match would prohibit many small, but trusted, community-based organizations from applying.

Finally, Administering Entities should be permitted to include additional covered populations they identify that have unique or extensive barriers to digital equity (e.g. unhoused populations or returning citizens). However, Administering Entities should not be permitted to deduct from or replace the eight covered populations outlined in the law.¹³

Question 8

Question 8, Sub-Question 1

How should NTIA define success for the Competitive Grant Program? What outcomes are most important to measure?

Congress outlined the goals of the Competitive Grant Program as threefold: 1) to award grants

¹² Infrastructure Investment and Jobs Act, § 60304(d)(3)(D)(iii), codified at 47 U.S.C. § 1723(d) (2021).

¹³ Infrastructure Investment and Jobs Act, § 60302(8) codified at 47 U.S.C. § 1721(8) (2021).

to support efforts to achieve digital equity, 2) promote digital inclusion activities, and 3) spur greater adoption of broadband among covered populations. Thus, NTIA should define success as the following:

- 1) Making systems-level changes to build and support strong local, regional, and state digital inclusion ecosystems that can adapt as technology changes and advances.
- 2) Investing in digital equity organizations, organizations operating digital inclusion programs, and organizations serving covered populations¹⁴.
- 3) Increasing access to the following for all covered populations:
 - a) Affordable, high-speed home internet access
 - b) Digital skills training opportunities (including cybersecurity and privacy)
 - c) Affordable, appropriate devices
 - d) Technical support
- 4) Increasing the number of digital inclusion programs and organizations.
- 5) Increasing the capacity of existing digital inclusion programs and organizations.

Lastly, Competitive Grant Program grantees should measure their own success by tracking and determining if they meet the goals of each individual they serve. Each individual person may have unique goals. Grantees should identify those goals when the person enters the program and track progress throughout the life of their participation in the program to determine if they are successful in supporting that individual.

Question 8, Sub-Question 2

How should NTIA measure the success of the Competitive Grant Program, including specific measures? Are the measures of success the same or different from the Capacity Grant Program? If so, please elaborate.

While NTIA should measure progress towards the Competitive Grant Program's overarching goals, individual grantees should specifically define success through the goals set out in their applications and programs. NTIA should provide flexibility to characterize success based on the baselines that different organizations work from. A predetermined, uniform, rigid definition of success will not allow grantees the flexibility to tailor programs to meet unique community needs and may discourage organizations from adapting their programs in real time based on

¹⁴ For context, NDIA identified and defined these three types of organizations as the following in our State Digital Equity Planning Toolkit:

1. **Digital Equity Organizations:** These are organizations whose primary purpose is to provide direct digital inclusion services and resources to under-connected communities. These organizations often provide digital skills training, support in accessing affordable/free internet, access to affordable/free computer devices, digital navigation services, or other digital inclusion services. Types of organizations include device refurbishers, community technology centers, community-based organizations, and digital inclusion coalitions (even though a coalition may not provide direct services itself, it would still fall into this category as its primary focus is digital equity). NDIA has a growing community of about 1,200 affiliate organizations doing digital inclusion work across the country. See what organizations are located in each state using the [NDIA affiliates map](#).
2. **Organizations Operating Digital Inclusion Programs:** These are organizations providing digital inclusion services and programs to under-connected communities along with other services. For example, libraries, workforce development organizations, faith-based institutions, and housing authorities often provide digital inclusion services and a bevy of other services.
3. **Organizations Serving Covered Populations:** These organizations serve the covered populations but may not explicitly provide digital inclusion services – literacy centers, senior centers, or organizations serving justice-involved individuals.

new learnings.

NTIA should measure the diversity of organizations that apply and receive funding as this will predict the overall success of the Competitive Grant Program. We encourage NTIA to design a program that encourages participation from smaller organizations that have strong relationships with covered populations but typically lack the capacity to participate in federally funded grant programs. The application process should not unfairly privilege local governments/organizations with higher capacity who are already comfortably endowed.

Broadly, the measures of success for the Competitive Grant Program should be similar to those as the Capacity Grant Program – to meaningfully reduce the barriers to digital equity for covered populations. But the Competitive Program grantees should not be held to the same standards as the Capacity Program grantees, as the scope of Competitive grantees will inherently be much narrower.

Question 9

What kind of activities or projects should the Assistant Secretary consider for inclusion in eligible projects and activities for the Competitive Grant Program?

In addition to the eligible activities outlined in the DEA, NDIA encourages NTIA to consider projects and activities that support local and regional coordination, digital inclusion coalition building, digital inclusion planning efforts, and other activities that build local digital inclusion ecosystems¹⁵.

A digital inclusion ecosystem combines programs and policies to meet a geographic community's unique and diverse needs to advance digital equity. Coordinating entities work together in an ecosystem to address all aspects of the digital divide, including affordable broadband, devices, and skills training. Once established, robust and healthy digital inclusion ecosystems will provide the necessary ongoing support and programming to address all facets of the digital divide. To embed sustainability into Digital Equity Act programs, communities need ongoing investments in the development, sustainment, and expansion of digital inclusion ecosystems.

We encourage NTIA to consider a wide range of digital inclusion programs and activities that leverage a variety of strategies to reach and serve covered populations. No matter what form the program takes, it will be important to evaluate whether it meets the Competitive Grant Program's overall goals and whether it serves the populations it seeks to serve. To that end, activities and projects should be co-created with residents to address barriers to digital equity on their terms. Residents should directly inform activities and projects for the Competitive Grant Program. NDIA encourages NTIA to only consider broadband infrastructure deployment projects in areas where BEAD grants will not address affordability and availability gaps, such as in urban environments. Instead, projects that address *barriers to broadband adoption* should be prioritized in the Competitive grant Program. NTIA should not allocate more than 10 percent of the total Competitive Grant awards to deployment projects. Many other broadband

¹⁵ Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, § 60102, 135 Stat. 429, 797-807 (2021).

infrastructure deployment programs exist, however, dedicated funds for digital skills, devices, tech support, and other digital inclusion activities do not.

Funding should also support the creation of digital inclusion coalitions, establish partnerships, and support capacity-building activities for community-based organizations alongside the provision of direct services. When considering investments in digital skills, programs that address both beginner and more advanced skills training should be eligible. Finally, we encourage NTIA to consider activities and projects that may not fit into the scope of their state/district/territory/Tribal entity's Capacity Grant.

Question 10

What group or groups that are not already listed should the Assistant Secretary consider to be eligible to apply for the Competitive Grant Program? The Assistant Secretary is allowed to prescribe such rules as may be necessary to carry out obligations relating to the Competitive Grant Program.

NTIA should prioritize digital equity organizations, organizations operating digital inclusion programs, and organizations currently serving covered populations. These types of organizations may come in many forms (i.e. nonprofit organizations, local or regional governments, workforce development boards, faith-based institutions, or public housing organizations) and the title or organization type should not be the determining factor for their eligibility or selection.

In addition to the eligible applicants, state-recognized Tribes should be eligible, since they do not qualify for planning or capacity awards directly from NTIA.

Internet service providers (ISPs), with the exception of Tribal-owned or -managed ISPs, should not be eligible applicants to ensure that funding is prioritized for trusted, community-based organizations and digital inclusion practitioners and experts. Additionally, non-Tribal owned and/or operated ISPs should be excluded because their participation in the application process would make the Digital Equity Competitive Grant Program less competitive and less equitable, as ISPs would have far more financial resources to dedicate to their applications.

Question 11

What rules, if any, should the Assistant Secretary develop to ensure that digital equity is achieved in the Competitive Grant Program?

The Assistant Secretary should consider creating rules that simultaneously ensure organizations with a proven track record of operating successful digital inclusion programs or currently serving covered populations receive resources to scale and continue their work, while also funding new, credible entrants to the digital inclusion field that will expand and diversify their digital inclusion ecosystem.

If NTIA only invests in known, established entities (i.e. current digital inclusion practitioners), it runs the risk of not expanding and supporting the digital inclusion ecosystem. Yet if NTIA invests in too many unknown organizations (i.e. organizations without digital inclusion services

or without experience serving covered population), it could be investing in unknown, untested organizations that may not be able to adequately support or serve their community's needs.

NTIA should design the program in such a way to strike a healthy balance and simultaneously invest in programs, organizations, and models that we know work, while also providing space for innovation and expansion of the field. Whether NTIA does so by scaffolding the grant award amounts based on relative experience and proven track records of the applicants or by some other means, we encourage NTIA to carefully construct the program to balance both these worthwhile goals.

Question 12

Question 12, Sub-Question 1

How should NTIA design a scoring rubric system to ensure that digital equity will be achieved in the Competitive Grant Program?

The scoring rubric structure should include multiple factors in which applicants are scored along a spectrum, as well as a structure to favorably weigh organizations with existing digital inclusion expertise and those with existing relationships with covered populations.

Specific elements that should be prioritized include: programs co-designed with the populations they seek to serve; programs that work on a flexible basis; programs that provide support as part of their model, including wraparound, holistic support for community members as they engage in digital opportunities; and programs that address all elements of digital inclusion.

Regardless of what scoring rubric weights and requirements NTIA determines to use, NTIA should ensure all information is stated clearly in the NOFO and application so potential applicants understand how the applications will be scored.

Question 12, Sub-Question 2

What factors, elements, and/or criteria should NTIA consider to ensure that funding is equitably distributed to serve the Covered Populations, e.g., by geography, covered population, project type, etc.?

To ensure the Competitive Grant Program is designed to select organizations best positioned to serve covered populations, the scoring system should, at minimum, evaluate the following elements: existing relationships with covered populations; proposed impact strategy (applicants would be expected to describe what makes the strategy high impact and define the method for evaluating the impact); experience serving populations with multiple attributes of covered characteristics; prior experience providing digital inclusion programming; existing or prospective partnerships; and sustainability plans.

Importantly, impact should not be limited to the number of people (or percent) the applicant intends to serve, because to do so would inevitably incentivize applicants to sacrifice the depth and scope of the programs. Some programs may necessarily only serve a small number of people, as those people could have deeper or more time-intensive needs. For example, digital

inclusion programs that serve individuals with disabilities in rural communities are necessarily high-touch and time-intensive, yet may only serve a small number of people. The potential impact of those programs is undeniable and should not be weighted or scored lower due to the number of potential beneficiaries alone.

Finally, it is important to avoid making grants by reimbursement, which can be burdensome for small organizations.

Question 13 [Combined with question 12 above]

Should NTIA use weighted scoring? If so, are there specific evaluation criteria to which NTIA should provide more weight or value in the evaluation criteria for the Competitive Grant Program (i.e., place more weight on collaborations that support building the capacity of local, community-based organizations that are delivering meaningful and impactful services to the Covered Populations, provide more than 10% of matching funds or resources, or intend to provide project benefits to multiple communities or Covered Populations)? NTIA encourages stakeholders to provide the rationale for their comments, including available examples of studies, measures, outcomes, assessments and supporting information.

Among the selection criteria we list in our response to Question 12, the following are key prioritization factors that should be weighted in the evaluation process: applicants demonstrating strong existing relationships with covered populations; applicants proposing a high-impact strategy (with descriptions of what makes the strategy high-impact and methods for evaluating their efficacy); and applicants that demonstrate a strong sustainability plan.

To maximize the number of applicants serving populations with the greatest need, NTIA should require no more than 10 percent in matching funds and allow the match to be composed of in-kind matches. Furthermore, NTIA should not privilege applications that propose a match over the 10 percent minimum requirement. As permitted in the Digital Equity Act, NDIA also recommends a waiver process for the match requirement, and to issue such waivers based on factors such as organizational budgets and the median income of the area to be served. Specifically, we encourage NTIA to issue waivers to organizations with annual budgets at or below \$2 million or organizations which primarily serve areas at or below 200% of the federal poverty level.

Question 14

What additional weight, if any, should NTIA give to proposed projects that align with the State, Territory, and/or Tribal entity Digital Equity Plans?

NTIA should carefully balance ensuring the Competitive Program grantees' work complements, and does not duplicate, work supported in the Capacity Grant Program. In addition, NTIA should encourage Administering Entities of the Capacity Grant Program to coordinate with Competitive Award grantees. However, for a variety of reasons, some Competitive Award grantees may not have been included as part of the planning process in their state/district/territory/Tribal entity. As such, they should not be held responsible for (or potentially constrained by) the measurable objectives, goals, and strategies their state/district/territory/Tribal entity developed. NTIA

should develop an internal mechanism for understanding the relationship between the proposed project and the Digital Equity Plan (and its implementation) for Competitive Grants.

Question 15

What are examples of past or current evidence-based or evidence-informed digital equity and/or inclusion projects or other relevant or similar projects that NTIA can showcase as a part of its technical assistance efforts to support applicants in identifying promising or evidence-based project models, partnerships, activities, and strategies to consider, replicate, and leverage lessons learned as applicable?

NDIA affiliates are successfully operating digital inclusion programs throughout the country. Their programs are models for how to successfully operate digital inclusion programs in a variety of different settings, contexts, and cultures. As follows is a list of best practices and resources from our community:

- 1. Digital Inclusion Coalitions and Ecosystems:** Community-based strategies should emphasize collaboration among diverse organizations and stakeholders to provide a holistic approach to digital inclusion. These strategies focus on collective impact through addressing barriers to digital access and use and include initiatives such as digital literacy programs, coordinated training resources, programs for affordable or subsidized internet access, and public-private partnerships¹⁶.
- 2. Digital Navigator Model:** The digital navigator model is a specific approach to digital inclusion that provides holistic, individualized support for community members as they seek affordable connectivity, appropriate devices, and digital skills¹⁷. Digital navigators are trusted guides who are trained to learn about an individual's goals, identify relevant resources, and assist individuals in accessing resources. This model often relies on a network of community-based organizations and trained digital navigators who can help people navigate digital resources, such as online job applications, healthcare portals, and educational materials, as well as resources for connectivity and low-cost devices, such as the Affordable Connectivity Program, and device refurbishers. The digital navigator model emphasizes personalized support and aims to address individual needs and barriers to digital access and use. The Center for Digital Equity in Charlotte, NC and Greater Cleveland Digital Navigators are two examples of strong digital navigator programs making an impact on their communities.
- 3. Holistic Service Delivery Model:** A comprehensive digital inclusion program provides training, hardware, and internet access to low-income families. The holistic model emphasizes collaboration among local organizations and volunteers to provide training

¹⁶ Munirih Jester, "NDIA Publishes New Digital Inclusion Coalition Guidebook," National Digital Inclusion Alliance, March 9, 2022,

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

¹⁷ "Digital Navigator Model," National Digital Inclusion Alliance, April 3, 2023,

<https://www.digitalinclusion.org/digital-navigator-model/>.

and support to participants¹⁸. This model has been successful in providing families with the resources they need to succeed in a digital world. For example, Tech Goes Home, based in Boston, MA, and The Enterprise Center of Tennessee leverage partnerships with schools, churches, nonprofits, and community centers to effectively serve a variety of populations¹⁹.

4. **Data Platforms/CRMs:** Data platforms and Customer Relationship Management (CRM) tools are essential for tracking and analyzing digital inclusion efforts. These tools allow organizations to collect and analyze data on program participants, track progress, and identify areas for improvement. Sharing data across organizations can also help build capacity and improve the effectiveness of digital inclusion ecosystem initiatives.
5. **Digital Skills Assessments:** Northstar Digital Literacy Assessment, for example, is a tool designed to assess an individual's digital skills and provide personalized learning resources to improve those skills²⁰. This tool is widely used across the United States and has been an effective framework for improving digital literacy skills.

Question 16

Question 16, Sub-Question 1

How should grantees define digital equity with respect to each of the Covered Populations?

Digital equity describes the condition in which all individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy.²¹ This understanding of digital equity does not change with each population, although the strategies to advance this goal may vary across covered populations. Grantees should build these strategies based on the particular challenges or barriers of the covered population they intend to serve with the grant.

Question 16, Sub-Question 2

What does success look like for each of the Covered Populations?

Defining success begins with assessing an individual's goals, no matter their identity, and working with them to achieve those goals. With this in mind, we encourage NTIA to allow grantees to define success based on the goals they identify in their proposals or plans, which should be informed by direct engagement with covered populations and organizations that serve them.

¹⁸ Angela Siefer, Bill Callahan, and Paolo Balboa, "Welcome," The Digital Inclusion Startup Manual, accessed May 1, 2023, <https://startup.digitalinclusion.org/>.

¹⁹ "Digital Equity: Training, Access, Technology," Tech Goes Home, accessed May 1, 2023, <https://www.techgoeshome.org/>; The Enterprise Center, September 24, 2021, <https://www.theenterprisectr.org/>.

²⁰ "Northstar Digital Literacy," Northstar Digital Literacy, accessed May 1, 2023, <https://www.digitalliteracyassessment.org/>.

²¹ National Digital Inclusion Alliance, "Definitions", accessed April 30, 2023, <https://www.digitalinclusion.org/definitions/>

Equity sometimes means larger investments in some places or toward distinct populations to rectify past harms and inequitable situations. So to truly meet the needs of the covered populations and underrepresented populations, NTIA will need to be open to funding projects that may not serve as many people but will have a greater impact on those most harmed by the digital divide.

Question 16, Sub-Question 3

How should NTIA measure the effects of access to and adoption of, and meaningful use of the internet for each Covered Population?

NTIA should encourage grantees to measure these effects through a variety of data collection activities, which may include surveys or pre- and post-assessments of digital inclusion programs (e.g. student self-report confidence in their ability to use the internet to access important services). Strong research and design of measurement tools will lead to a meaningful analysis of how access and adoption shape a person's online behavior and the implications for their life. An example of sound research design and meaningful analyses can be found in the 2021 Access and Impacts Survey.²²

Question 16, Sub-Question 4

What examples of equity gap analysis and tools should the Assistant Secretary consider when measuring outcomes as they relate to each Covered Populations?

When measuring outcomes in the Capacity Grant Program, we encourage NTIA to utilize gap analysis tools built or leveraged by each grantee during the development of the state Digital Equity Plan. Each Administering Entity established its own baseline in the needs assessment using a combination of federal databases, local surveys, and other relevant sources to quantify barriers. NTIA should leverage the tools state/district/territory/Tribal entities used to track these metrics consistently.

In addition, we encourage NTIA to review the following examples of gap analysis tools that evaluate outcomes for covered populations: AAPI Digital Access Survey and Connecting Philadelphia: 2021 Household Internet Assessment Survey²³.

Question 16, Sub-Question 5

To what extent should grantees disaggregate data within each of the Covered Populations to reveal the underlying trends and patterns? NTIA encourages stakeholders to provide the rationale for their comments, including available examples of studies, measures, outcomes, assessments and supporting information.

²² See John B. Horrigan, Ph.D, *Access and Impacts: Exploring how Internet access at home and online training shape people's online behavior and perspectives about their lives* (Technology Policy Institute, 2021), <https://techpolicyinstitute.org/wp-content/uploads/2021/06/HorriganIE.pdf>

²³ "AAPI Digital Access Survey," OCA National Center, accessed May 1, 2023, <https://www.oceanational.org/digital-access-survey>; "Philadelphia," accessed May 1, 2023, <https://www.phila.gov/media/20211019110414/Connecting-Philadelphia-2021-Household-Internet-Assessment-Survey.pdf>.

State capacity grantees should disaggregate data within each of the covered populations to the extent they are able through the planning process and the plan's implementation. In addition, they should provide the disaggregated data to subgrantees to support program evaluation. However, competitive grantees should not be held to the same rigor and standards. NTIA should not institute data analysis or collection and program evaluation requirements that would necessitate a grantee to spend more than 10 percent of its grant funds on data collection and evaluation (as this is the maximum percent they are allowed to spend on such activities). NTIA and Administering Entities should be mindful of the administrative resources required to accurately track data, which can be burdensome on smaller organizations lacking the institutional capacity of larger organizations or universities.

Question 17

Question 17, Sub-Question 1

What metrics and performance data infrastructure and data governance strategies and tools are needed to create a vibrant digital equity ecosystem (e.g., metrics, digital skills, sustainability) to measure program effectiveness and effects for Covered Populations?

Program metrics should be designed based on theory of change and logic models that should be developed by the community and organization implementing the program and project. NTIA should allow for some metrics to be determined by the organization implementing the program to define success.

Question 17, Sub-Question 2

What publicly available datasets and tools should NTIA and grantees (e.g., States, Territories, nonprofits, develop) enhance or support to benchmark and to track progress of grantee goals and objectives?

Administering Entities will develop datasets and tools during their planning process. Those should be made available for use by Capacity Grant subgrantees and Competitive Grant awardees located in their state/district/territory/Tribal entity. In addition, State Digital Equity Plans should be developed with a long-term time horizon (5, 10, 20+ years) in mind. Thus, the resources they develop to quantify digital equity needs and barriers in addition to measurement of the impact of implementation strategies should be created with sustainability and updating in mind. In NTIA's review of the Digital Equity Plans, the ability to measure progress over time and to update needs and targets should be prioritized.

Additional tools include: the Digital Opportunity Compass as a framework for understanding and measuring digital equity ecosystems, the Digital Equity Research Center's Digital Equity Ecosystem Measurement Framework, NDIA's National Digital Navigator Corps's program data platform, and Purdue University's Digital Divide Index²⁴.

²⁴ "Digital Opportunities Compass," Benton Foundation, February 28, 2023, <https://www.benton.org/blog/digital-opportunities-compass>.; Digital Equity Ecosystems Measurement Framework," Digital Equity Ecosystems Measurement Framework | Metropolitan New York Library Council, accessed May 1, 2023, <https://metro.org/content/digital-equity-ecosystems-measurement-framework>.; "National Digital Navigator Corps," National Digital Inclusion Alliance, September 7, 2022, <https://www.digitalinclusion.org/digital-navigator-corps/>.

Question 18

Question 18, Sub-Question 1

NTIA will require regular grantee performance and progress reporting, e.g., semi-annually, project close out to monitor grantee implementation of funded projects and capture metrics, outcomes, and impact. How should NTIA measure grantees implementation of such metric tracking?

NDIA encourages NTIA to require no more than two progress reports per award year, as exceeding this amount will place an undue burden on smaller organizations and organizations that are new to federal grant programs. To facilitate a smooth reporting process, NTIA should clearly describe reporting requirements (e.g. frequency, detail, example metrics) and ideally include reporting templates, in the grant application materials so that applicants may sufficiently budget for these activities. NTIA should also provide templates, reporting training, and technical assistance in advance of the submission deadline to allow sufficient time for grantees to ask clarifying questions and ensure their data tracking processes allow for easy integration into the report format.

Question 18, Sub-Question 2

To what extent should NTIA require standardized inputs, metrics, and measures in order to facilitate nationwide insights?

Reporting aggregate impacts of the Competitive Grant Program will be critical to NTIA demonstrating that Digital Equity Act funds were effectively deployed and to making the case for future investment of federal funds in digital equity programming. We encourage NTIA to balance this important objective with ensuring that the reporting requirements do not bias the Competitive Grant Program toward large-scale, generic strategies that are conducive to high-level, standardized metrics and against strategies that are designed to address the specific needs and goals of covered populations.

We encourage NTIA to emphasize standardization in the format and required content of reporting templates (e.g. covered population(s) served, impact narrative, alignment to defined needs and objectives in an existing state or local digital equity plan), while maintaining flexibility in the specific metrics and measures used to measure impact.

We encourage NTIA to clearly communicate reporting requirements and processes in the application materials. To the extent that any standardized metrics or measures are required, they should be also defined in the application materials to allow applicants to sufficiently plan and budget for additional data collection and reporting in their applications. Rather than establishing specific standardized reporting metrics, we encourage NTIA to define categories of programs and impacts that could be aggregated to report nationwide insights. This accommodates data aggregation while allowing applicants to define impact measures that are relevant to the specific digital equity strategies they propose and avoiding overly-burdensome

"Rural Indiana Stats," Digital Inclusion | Digital Divide Index, accessed May 1, 2023, <https://pcrd.purdue.edu/ruralindianastats/broadband/ddi.php?variable=ddi-overview&county=Adams>.

data collection requirements. NTIA employed this approach in defining categories of measurable objectives for the Digital Equity Act State Planning Grant Program²⁵. Throughout program implementation, grantees should be required to submit progress reports in a manner consistent with the metrics established in their application.

We encourage NTIA to provide reporting templates and make them available as soon as possible, but no later than the start of the day of the grant period. Digital inclusion practitioners voiced the importance of simple, intuitive templates, and sufficient time to seek clarity and guidance in the early stages of the grant period.

With regard to specific data reporting requirements, we advise NTIA against requiring grantees to collect data from program participants after they complete a program (e.g. digital skills training), as this information is rarely attainable, particularly among hard-to-reach groups such as transient and unhoused individuals. In considering potential standardized inputs, metrics, and measures, we encourage NTIA to be mindful of the data sources commonly used in developing baseline needs assessments – generally a combination of primary and secondary data sources. The frequency and granularity with which those data collection and dissemination activities occur are often insufficient to show the impact of specific programs. For example, the American Community Survey and the Computer and Internet Use Survey are commonly used sources, but as large national surveys they would take several years to reflect the impact of even large national-scale interventions and would be unable to detect the impact of a community-level intervention for a specific covered population²⁶. Digital inclusion practitioners caution against imposing the inclusion of data sources they did not use in developing their programs and implementation strategies, or otherwise did not anticipate using (e.g. data from the Census Bureau).

We further recommend NTIA hold office hours in advance of the application submission deadline, as well as post-award technical assistance to give grantees the opportunities to ask questions or raise concerns well in advance of submission deadlines.

Question 19

For each of the Covered Populations, what are proven strategies and tactics, projects or programs, with outcome-based measures and impacts, that promote and achieve digital equity?

Each approach's effectiveness will depend on a range of factors, including the specific needs of the covered population and the local context. As such, it is essential to consult with the community being served and gather accurate data to identify areas of opportunity, measures of success, and desired impacts. As follows are a few (but not an exhaustive list of) proven strategies, tactics, projects, and programs.

Individualized, Tailored Support:

²⁵ "Notice of Funding Opportunity State Digital Equity" (NTIA), accessed May 1, 2023, <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-05/DE%20PLANNING%20GRANT%20NOFO.pdf>.

²⁶ US Census Bureau, "American Community Survey (ACS)," Census.gov, March 16, 2023, <https://www.census.gov/programs-surveys/acs>; US Census Bureau, "Computer and Internet Use," Census.gov, July 6, 2022, <https://www.census.gov/topics/population/computer-internet.html>.

Providing individualized support, embedded in other support programs at trusted organizations, can be an effective strategy to promote digital equity. Programs like Tech Changemakers 4-H, Easter Seals of Greater Houston, Northstar/Literacy Minnesota, OATS, Oasis, and Cyber Seniors, offer tailored support to specific populations, such as rural residents, veterans, low-literacy individuals, and aging adults, respectively. The peer-to-peer learning approach used in these programs, where the program delivery is based on the learner's needs, can help reduce digital equity barriers. Pre and post-assessments can be used to measure the effectiveness of the program.

Digital Navigator Model:

As previously noted, the Digital Navigator Model is another effective approach to promote digital equity. Digital Navigators act as a bridge between community members and available resources, providing support in internet adoption, device access, and digital skills acquisition. The model has seen success in peer-to-peer contexts, such as community elders and seniors working together to assist with ACP registration and speakers of languages beyond English. This model has also been successful in communities where a "home visit" method of community outreach is necessary, such as seniors, rural individuals, incarcerated populations, people with disabilities, English language learners, and veterans. Accurate data is necessary to ensure that those populations are represented, and it is important to consult with Tribal entities to gather data. It is critical to provide training and education for current and future job opportunities that are needed to achieve digital access.

Hiring From the Community:

Hiring people from the community (or covered population) for digital inclusion positions is an effective approach to ensure the digital inclusion programs are tailored to the needs of the community or population and to build trust. For example, Gila River Telecommunications hired members from the Gila River Indian Community to operate the Digital Connect Initiative, a multi-faceted digital inclusion initiative designed to close the community's digital divide²⁷. However, sometimes, finding members of the covered populations or in minority communities who have the capacity to take on those roles can be difficult, so grant programs should support training and funding for community members.

Trusted Community Anchor Institutions:

Community Anchor Institutions (CAIs) like libraries are already trusted institutions within the communities they serve. Programs like Nashville Public Library partners with community organizations that already serve seniors. Programs are then taken to the seniors where they live or are already receiving services²⁸. Building programs that are flexible in curriculum and delivery is critical in building effective programs. Time, learning style, content, transportation, food, childcare, etc. are all factors that need to be considered when developing and implementing digital equity programs.

Question 20

²⁷ "Digital Connect Initiative," Digital Connect Initiative, accessed May 1, 2023, <https://digitalconnect.org/>.

²⁸ "Nashville Public Library," Homepage | Nashville Public Library, May 1, 2023, <https://library.nashville.org/>.

Youth and young adults are members of each of the Covered Populations except for Older Americans. The COVID–19 pandemic had a devastating impact on academic achievement, physical and mental health, and earning opportunities for our youth and young adults. How can NTIA encourage and measure the effects of investments in our youth and young adult?

NTIA should encourage programs that expand efforts for accessibility, sustainability, and long-term reliability for all covered populations and members of covered populations like youth, who may not be named directly but are hidden populations within the larger covered population. For example, returning citizens and unhoused populations may also be members of multiple covered populations but are not named as a specific population. Administering Entities and Competitive Grant awardees should prioritize. As such, NTIA should allow and encourage Administering Entities and Competitive Grant awardees to design programs to meet the unique needs of the covered populations and the hidden populations within them.

Measuring the effects of programs should be accompanied by standards that ensure programs are trusted and reliable, such as considering the strategies for the viability of the programs and the inclusion of youth and young adults to culturally contribute to skill training and relevant apprenticeship programs, which serve to incorporate younger generations in the workforce and incentivize non-traditional education in the job market. NTIA should encourage yearlong access and permission for broad use through the programs, measuring if outcomes for youth receiving devices from school is similar to youth whose family owns devices.

NTIA should measure the effects of investments in our youth and young adults by quantifying equipment that has been rented and donated and how it has become accessible to community members, such as through income scaling and learning to own. Access to devices helps develop skills both at home and at school. Having access to devices in both places is now necessary to accomplish k-12. Devices are vital for students planning on attending college, proper research for academic institutions, the application process, funding, and during enrollment. If these programs are meant to meet all the digital needs of youth, these programs should include goals and measures connected to the benefits of connectivity beyond participation in school to include strong, multifaceted digital skills, access to healthcare, and social-emotional needs.

Question 21

Question 21, Sub-Question 1

To ensure all learners (youth, adult, incarcerated, etc.) have access to the opportunities that technology unlocks, how should NTIA promote a baseline or fundamental standard for digital literacy for all learners?

A national framework for addressing the full spectrum of digital fluency does not currently exist. NTIA should rely on existing digital skills frameworks for a baseline, such as the Seattle Digital Equity Initiative's Digital Skills Framework²⁹, that promotes hard and soft digital skills. The

²⁹ See Stacey Wedlake et al., *Digital skill sets for diverse users: A comparison framework for curriculum and competencies* (University of Washington Information School; Seattle Information Technology Department, 2019)

baseline of digital skills should be constructed with regard to the social, communication, and creative needs of the community, in addition to the technical, professional, and security needs of an individual.

Question 21, Sub-Question 2

What kind of baselines should NTIA's grant programs strive to achieve and should the intended outcomes be based on a type of standard which includes varying levels of digital skills, such as pre-basic, basic, intermediate and advanced? If so, please elaborate.

Intended outcomes of the Digital Equity Act programs should be based on varying levels of digital skills. 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. NTIA 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. Other programs that assess digital skills and provide skill learning are found in public library curricula such as TechConnect, NYPL, Goodwill Community Foundation Global, and other organizations such as Seattle Framework, and ISTE of which all typically categorize computer classes by skill level³⁰.

Question 22

Question 22, Sub-Question 1

How can NTIA best ensure that States and Territories that receive funding under BEAD and Digital Equity Programs are closely aligning their planning efforts to close the equity gaps for all Covered Populations?

NTIA should closely evaluate the BEAD and Digital Equity Plans to ensure both were co-created with the community through meaningful community engagement. In addition, NTIA should ensure that the BEAD plans adequately address affordability for both low-income and middle income households. NTIA should carefully monitor the outlined uses of the funds outlined in the BEAD plans and that any remaining funds (after serving all unserved, underserved and CAI locations) support the implementation of its Digital Equity Plan.

<https://digital.lib.washington.edu/researchworks/bitstream/handle/1773/43467/digital%20skills%20recommendations.pdf?sequence=1&isAllowed=y> See also relevant excerpts and outline:

<https://docs.google.com/document/d/1-ucdHhRwIBEkEeZR7kDKPSXznWquwVihYpZsFYDNojM/edit?usp=sharing>

³⁰ "TechConnect," Google Sites: Sign-in, accessed May 1, 2023, <https://sites.google.com/nypl.org/techconnect/>;

"NYPL," The New York Public Library, accessed May 1, 2023,

https://www.nypl.org/?gclid=CjwKCAjwxr2iBhBJEiwAdXECw4fJ-uFVnlRTKudrPtg3K50St9dgXeltu2CJbCDEkqroi5Or894o0xoCDwIQAvD_BwE.; "CFGGlobal," GCFGlobal.org, accessed May 1, 2023, <https://edu.gcfglobal.org/en/>.; "Digital Skill Sets for Diverse Users - Seattle.gov," accessed May 1, 2023,

<https://www.seattle.gov/Documents/Departments/Tech/DigitalEquity/digital%20skills%20for%20diverse%20users.pdf>.; "ISTE Standards: Students," ISTE, accessed May 1, 2023,

<https://www.iste.org/standards/iste-standards-for-students>.

Question 22, Sub-Question 2

How can NTIA work with the States, Territories, and their communities to promote the collective impact and outcomes between BEAD's Five-Year Action Plan and States' Digital Equity Plans to achieve equity for its Underrepresented Communities/ Covered Populations?

NTIA should provide timely guidance, best practices, data, and information for all grantees (BEAD, Capacity Grant Awardees and Competitive Grant Awardees). Given its national scope, NTIA will have a birds eye view and should identify opportunities for coordination and collaboration amongst grantees and provide resources and best practices it learns as the programs progress. NTIA should provide opportunities for grantees to learn directly from each other too, in-person and virtually, throughout the course of the programs.

Question 23

How can NTIA encourage the design and implementation of Digital Equity Programs to support and advance the economic mobility of members of Underrepresented Communities/ Covered Populations to support BEAD implementation and broader economic outcomes (e.g., through new skills, upskilling, re-skilling, career pathways, and other high-quality workforce development activities)?

NTIA should coordinate workforce goals within BEAD and DEA and allow funds from BEAD to address workforce goals and gaps identified through both the 5 year action plan and the DEA plan. NTIA should consider a broad range of activities as workforce development activities connected to the broadband industry, from fiber splicing classes to digital skills workshops and classes. All will support and provide opportunities for more U.S. residents to participate in the digital economy.

NTIA should also encourage partnerships between community-based digital skills, device access, and connectivity programs with complementary credentialing programs and industry partners. These partnerships support a pipeline for community members to gain the digital skills they need to be competitive in the workforce.

NTIA should promote equity in hiring practices for technology and broadband deployment related projects. To promote diverse workforce participation, NTIA should encourage grantees to proactively recruit residents of communities targeted for infrastructure projects.

Question 24, Sub-Question 1

How can the BEAD and Digital Equity Programs support and promote youth employment and skills building?

BEAD and Digital Equity Programs that aim to support and promote youth employment and skills-building need to perform outreach with specific targeted populations - especially if programs are intended to impact youth skill-building and career development. Active outreach that allows the communities being served to have a say in the structure of their learning is necessary for successful programming, such as outreach with high school students and school districts, while obtaining their feedback on the skills they require to thrive in this digital age. BEAD and Digital Equity Programs should consider community colleges, adult education

practitioners, career and technical education experts, and workforce development organizations as partners. NTIA should encourage these programs to look to prek-12, higher education, librarians, carceral education, apprenticeship training, and career tech training as resources for how to deploy digital skills curricula on a massive scale. NTIA should encourage these programs to develop working groups with these educational technology researchers, practitioners, and policymakers to determine basic digital skills for 21st-century inclusion in the digital economy.

Additionally, organizations that specialize in and focus on digital inclusion work, but do not necessarily focus on workforce development or youth development, should not be penalized. Digital equity organizations have various financial and capacity limitations and should not be in competition with more financially stable or better resourced organizations located in different communities.

Question 24, Sub-Question 2

What kind of programs, projects, and partnerships—based on existing evidence—would encourage and prepare youth to have the digital skills needed to be workforce-ready, but also to enter internet and internet related careers?

NTIA should look to programs such as youth Digital Navigators and the Senior2Senior models to provide youth with basic technology skills, training in customer service, technology instruction techniques, data collection, and community outreach. 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, HeadStart or YouthBuild model, which implement and incentivize digital skill training and certifications for all³¹. These community-based digital ambassador programs can also help to connect youth to a wide array of roles and jobs, such as librarians, social workers, technology instructors, instructional designers, etc.

³¹ “DQ Institute,” accessed May 1, 2023, <https://www.dqinstitute.org/>; “ISTE Standards: Students,” ISTE, accessed May 1, 2023, <https://www.iste.org/standards/iste-standards-for-students>.; <http://mnabe.org/abe-content-standards>; “Headstart Digital,” SEO agency, January 18, 2023, <https://headstartdigital.com/>.; “YouthBuild,” The HOPE Program - Work. Grow. Sustain, January 4, 2023, <https://www.thehopeprogram.org/youthbuild/>.