

May 1, 2023

ATTN: Angela Thi Bennett
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW, Room 4878
Washington, DC 20230

Submitted online: <https://www.regulations.gov/commenton/NTIA-2023-0002-0001>

Dear Ms. Bennett:

World Education, Inc. (WEI) appreciates the opportunity to respond to the U.S. Department of Commerce's National Telecommunications and Information Administration (NTIA) Request for Comment on the Digital Equity Act of 2021 (Docket Number NTIA-2023-0002). Included in this letter are WEI's comments on the Request for Comment, outlined in accordance with the questions posed.

Our response is based on our vast experience developing models and resources for closing digital skill gaps and the digital divide. We are leaders at leveraging technology effectively and equitably to increase impact and opportunity. Our perspective reflects our belief that everyone has the right to high-quality education and economic opportunity. It also reflects the unique vantage point we bring as leading implementation partners for diverse federal and state departments that fund digital skills development, from the U.S. Department of Education to the Institute of Museum and Library Sciences to our international work with funders such as the U.S. Agency for International Development and the United Nations Children's Fund.

Your investment in this issue shows the willingness of the Department of Commerce to invest in a critical issue that is ever-evolving and impacting the lives and determining the futures of all Americans. Thank you for this opportunity to respond.

Please address any inquiries related to this letter to me.

Regards,



Priyanka Sharma
Vice President of US Division
World Education, Inc.



WORLD EDUCATION

44 FARNSWORTH STREET, BOSTON, MA 02210-1211 • WWW.WORLDED.ORG • VOICE: 617.482.9485 • FAX: 617.482.0617

DIGITAL EQUITY ACT OF 2021; REQUEST FOR COMMENTS

About World Education

With 70 years of experience in over 50 countries, [World Education, Inc.](#) (WEI) is a global nonprofit organization headquartered that advances equity and opportunity by improving the quality and accessibility of education for children and adults. In the United States, we improve the availability, quality, and capacity of adult education and workforce programs to respond to evolving economic and community contexts and advance equity.

WEI-US is a leader in providing capacity-building services to adult education and workforce development systems in all 50 U.S. states through innovative demonstration projects, professional development, research, and targeted technical assistance.

Founded in 2015, World Education's [EdTech Center \(ETC\)](#) advances digital equity to enable everyone to thrive as learners, workers, and family and community members in the digital world. Our staff and global network of partners are experts on integrating technology to increase the reach and impact of programming as well as on digital learning, digital inclusion, and digital literacy development. As they lead diverse projects both in the U.S. and internationally, they are informed and guided by a radical commitment to equity, accessibility, excellence, open access, and collaboration.

Focus on Digital Equity in the U.S.

Specifically, in the area of digital equity, WEI has been a thought leader and implementer for many current digital literacy and digital equity initiatives funded by federal, state, and private entities. Specific projects and their alignment with the questions are included below.

WEI recognizes digital inequity as a major driver compounding existing disparities in society. In 2019, World Education designed and formed the [Digital US](#) coalition, which it continues to lead. Digital US raises awareness of the need to close digital skill gaps, inspires partners across the digital equity ecosystem to take needed action, and aligns existing efforts of all involved, including employers, service providers, policymakers, philanthropists and other stakeholders. As reported in the [2020 Digital US report](#), World Education first started using and then further promoted the field's adoption of the term "digital resilience," informed by the work of education scholars (Kop, Fournier & Mak, 2011)¹. World Education's research demonstrated the need to shift digital skills instruction from teaching specific skills to developing the ongoing awareness, understanding, skills, and competence needed to become lifelong learners of new technologies.² World

¹ <https://www.irrodl.org/index.php/irrodl/article/view/1041>

² <https://www.irrodl.org/index.php/irrodl/article/view/1041>

Education and its Digital US partners also coined and disseminated the term “[Digital Navigator](#)” and have continued to advocate for these services alongside the shifting of instruction towards “digital resilience.”

WEI has built both these approaches into many of its other current projects, including:

- The [Digital Resilience in the American Workforce \(DRAW\)](#) initiative, which is funded by the U.S. Department of Education’s Office of Career, Technical, and Adult Education (OCTAE), and is aimed at better preparing adult education practitioners who support learners that struggle to fully engage in tasks that demand the use of digital technologies;
- The [Transforming Immigrant Digital Equity \(TIDE\)](#) project, a privately funded project that educates and engages service providers, policymakers, institutional decision-makers, and advocates for re-envisioning adult education, digital equity, and immigration in order to expand access to English language learning and digital inclusion for immigrants and refugees; and
- Various technical assistance projects for individual states. In our facilitation of the [Innovating Digital Education for Adult Learners \(IDEAL\) Consortium](#), we have provided support to over 20 member states on the design of distance education, blended learning, and HyFlex courses that integrate support of learner digital literacy so that learners can fully participate in technology-rich learning.

WEI is a go-to organization for thought leadership on digital equity and has hosted events in partnership with the U.S. Department of Labor and the U.S. Department of Education and presented on the topic at several national and state conferences. Most recently, WEI has conducted national presentations on digital equity for NTIA, OCTAE, the U.S. Department of Labor’s Employment and Training Administration, the National Skills Coalition, and the National Governors Association. WEI is committed to supporting digital resilience at multiple levels throughout the nation.

To meet the President's goal of closing the digital divide and transforming the lives of all Americans, our comments reflect the work of our current and past projects as well as the expertise we have gathered from our work and partnerships. Our impact on the digital literacy and resilience of adult learners is vast, and we welcome the opportunity to discuss our initiatives and expertise in more detail at the request of NTIA.

World Education's Responses

A. Assessing State Digital Equity Plans Under the Digital Equity Planning Grant Program

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? What criteria/factors/outcomes should communities focus on in their review? How can NTIA ensure that States/Territories consult with Tribal entities about how best to meet Tribal members' needs?*

To enable communities to review and provide actionable feedback to States regarding State Digital Equity Plans, States should:

1. Ensure clear and accessible communication about their State Digital Equity Plan and the public comment process in a variety of formats (paper/mail, phone, online, in-person) and languages (plain language, languages other than English).
2. Provide clear and accessible summaries of the State Digital Equity Plan and its goals and anticipated outcomes, including how the plans will benefit each of the Covered Populations and address their barriers to digital equity in plain language and languages other than English.
3. Ensure that communities can participate in the public comment process in their preferred format (paper/mail, phone, online, in-person) and language and that public comments submitted in languages other than English are welcome and given equal consideration as public comments submitted in English, and that locations for in-person comments are accessible to the communities and scheduled at times when the community can participate, ensuring accessibility and reasonable accommodation.
4. When scheduling in-person comments, it is crucial to consider the accessibility of the venue and the timing, which should align with the community's availability. States should proactively identify and eliminate any physical, transportation, information, and communication barriers that might hinder participation or provide reasonable alternatives as needed. Asking participants what they need is also crucial in ensuring full accessibility and inclusivity in the public comment process.
5. Ensure that translation and/or interpretation of all public communication efforts are conducted by qualified, professional translators and interpreters with experience translating/interpreting for the target community.

6. Focus on soliciting public comments using a set of criteria and factors that could include, but are not limited to, how well the State Digital Equity Plan addresses: a) access to broadband and devices, b) affordability, c) digital skills, d) inclusivity and responsiveness to the needs of Covered Populations, e) engagement efforts and collaboration with key stakeholders and communities, f) long-term sustainability, and g) evaluation of and accountability for implementation efforts.
7. Commit to and establish meaningful opportunities for engagement and partnerships with community stakeholders beyond the public comment period to allow for ongoing feedback, assessment, and recommendations regarding State Digital Equity Plan implementation and to ensure that implementation is responsive to the ever-evolving needs of Covered Populations.

The Quello Center's [Digital Opportunities Compass](#) also offers a framework for measuring and evaluating digital equity plans and efforts across six areas:

1. Contexts (e.g., socioeconomic and demographic factors),
2. Governance (at local, state, and federal levels),
3. Connectivity (from infrastructure to adoption),
4. Skills (digital literacy skills),
5. Application (applying connectivity and skills in context), and
6. Outcomes (broader impacts of digital equity on individuals and communities).

The Digital Opportunities Compass complements the requirements laid out in the Digital Equity Act, with an eye on sustaining and expanding the work long-term. States could turn this or similar frameworks into a list of considerations communities should focus on when reviewing the State Digital Equity Plan or incorporate it directly into the feedback process. Regardless of the framework selected, States should also consider areas that may be missing.

Question 2: *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.^[15] What additional guidance/resources should NTIA provide to States, Territories, and Tribal entities as they develop their Digital Equity Plans? 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? 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?

Additional guidance/resources NTIA should provide to States, Territories, and Tribal entities as they develop their Digital Equity Plans include:

- Guidance on how States, Territories, and Tribal entities can ensure that their Digital Equity Plans are inclusive, culturally responsive, and aligned with the unique needs of their communities. This could include guidance on how to engage with communities facing systemic barriers to digital access and inclusion and collect data to show that there is diverse representation in feedback.
- Guidance on how States can embed their State Digital Equity Plan efforts into their state plans for the Workforce Innovation and Opportunity Act (WIOA) and Perkins V, and/or their other ongoing investments in education and training.
- Guidance and resources on designing, implementing, and sustaining a robust digital equity ecosystem at the state and local levels. To strengthen and sustain the impact of State Digital Equity Plans, States must have guidance and support on understanding and meaningfully engaging different stakeholder sectors, including Covered Populations and individuals with lived experience, and building a system of strong connections and networks across the state. As one example, World Education's [Transforming Immigrant Digital Equity \(TIDE\)](#) project features an ecosystem model that weaves together elements of English language learning, digital inclusion, and immigrant and refugee inclusion in a system-wide approach to support equitable language learning and digital resilience opportunities. At the center are adult immigrant and refugee English language learners, who are not only participants in the system but also co-creators, subject matter experts, community advocates, and agents of change. Innovative, community-driven ecosystem models such as TIDE's are critical to ensuring lasting change through Digital Equity Act investments.
- Guidance on building a community of practice for States, Territories, and Tribal entities to share best practices, challenges, and solutions around developing and implementing their Digital Equity Plans on an ongoing basis. When the U.S. Department of Labor established the Trade Adjustment Assistance Community College and Career Training grant program in the early 2000s, a robust practice group was convened to discuss implementation and promote effectiveness. NTIA could replicate this model and additionally provide a space for States, Territories, and Tribal entities to archive any lessons learned and share the research they have produced. Similarly, World Education's [Innovating Digital Education in Adult Learning \(IDEAL\) Consortium](#) offers a community of practice and learning circles

to education leaders from member states to strengthen the impact of the existing professional development and technical assistance services provided.

- Guidance around the provision of reasonable accommodations for individuals and communities seeking to enroll in federal initiatives like the Affordable Connectivity Program (ACP). The current ACP enrollment process has been proven to pose significant challenges for individuals without existing home connectivity (currently, individuals must apply for the ACP online or by mail) and individuals with a language barrier. In addition, for some low-income individuals, the reduced internet cost is still not affordable. The provision of services at no cost or on a sliding scale could at least partially address this challenge. If these considerations are not addressed when designing these federal tools, NTIA should provide guidance on how States and community organizations can address them in implementation.
- Guidance for States, Territories, and Tribal entities on partnering with the Federal Trade Commission (FTC) to enforce federal consumer protection laws that prevent online fraud, deception, and unfair business practices and to develop customized training to build awareness and online privacy and cybersecurity skills for Covered Populations.

To ensure that individuals and communities can provide feedback to States, Territories, and Tribal entities to ensure their unique communities' needs are solicited, considered, and reflected in the Digital Equity Plans, NTIA can:

- Provide key stakeholders, Covered Populations, and individuals with lived experience with clear and accessible information regarding 1) how they can engage in state planning efforts and provide feedback to their states, including during the public comment period, and 2) help amplify State communications and awareness-building efforts around the Digital Equity Act.
- Uplift examples of and share examples from States, Territories, and Tribal entities that actively and explicitly engage individuals and communities belonging to Covered Populations, as opposed to States that are not explicitly doing so or that are only engaging organizations representing these individuals and communities.
- Ensure that adult education leaders and adult learners are highly involved in the thought leadership and implementation of State Digital Equity Plans. The overwhelming majority of adult learners are individuals with a language barrier and members of at least one other Covered Population. Adult educators, in addition to their expertise in delivering digital literacy training and other digital inclusion services for individuals with a language barrier and other Covered Populations, have meaningful relationships with the communities they serve. Together, adult learners' and adult education providers' knowledge, lived experience, subject matter

expertise, and community networks can be leveraged so that adult learners are engaged in providing feedback throughout the planning and implementation process.

- Support States, Territories, and Tribal entities in collecting anonymized data on individuals and communities involved in feedback efforts to demonstrate that feedback has been solicited and considered from all Covered Populations.

B. State Digital Equity Capacity Grant Program

Question 3: *How should NTIA define success for the Capacity Grant Program? What outcomes are most important to measure? How should NTIA measure the success of the Capacity Grant Program, including measures and methods?*

At the minimum, NTIA should define success based on the following criteria:

1. The number of members from Covered Populations who gain access to reliable, affordable, high-speed broadband service;
2. The number of members from Covered Populations who adopt broadband service;
3. The number of members from Covered Populations who gain access to affordable, appropriate devices;
4. The number of members from Covered Populations who are participating in digital literacy instruction or other digital skill-building opportunities;
5. The number of members from Covered Populations who demonstrate increased digital skills;
6. The number of members from Covered Populations who gain access to high-quality technical support;
7. The number of State-owned applications and online content (including State websites) that have been redesigned to ensure access by members of Covered Populations;
8. The number of local governments and providers partnering with the Federal Trade Commission's [Consumer Advice Division](#) to provide training and information for Covered Populations regarding awareness of measures to ensure online privacy and cybersecurity;
9. The extent to which the State Digital Equity Plan's implementation has effectively addressed the unique needs of each Covered Population; and

10. The economic, educational, health, and civic and social engagement impacts of any implemented activities on the lives of members of Covered Populations; for example, including but not limited to their ability to obtain and retain employment with family-sustaining wages, work remotely, participate in online learning and upskilling opportunities, access healthcare, safely participate in and use online banking services, and engage in civic and community activities.

To measure the success of the Capacity Grant Program, NTIA should utilize a range of quantitative and qualitative methods, including surveys, focus groups, and case studies. NTIA should also solicit feedback from key stakeholders and members of Covered Populations for each state to ensure that the implementation of the State Digital Equity Plan is successfully addressing their unique needs. This practice would also reinforce the role of key stakeholders and Covered Populations as co-designers of the State Digital Equity Plan and its listed activities. Any data regarding Covered Populations should be disaggregated by Covered Population type.

In identifying outcomes to measure, NTIA should prioritize those that go beyond 1) standardized testing and 2) measures solely tied to employment and postsecondary enrollment and completion. While these measures and methods are significant, they do not provide a holistic view of the impact of digital equity and inclusion activities. NTIA should allow a reasonable degree of flexibility regarding outcomes for each Covered Population in order to support the range of activities critical to meeting each Covered Population's needs.

Question 6: *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? What steps, if any, should NTIA take to monitor and evaluate implementation practices? From a sustainability perspective, what role can collaborations, partnerships, and coalitions play? Please share examples of any existing impactful collaborations, partnerships, and/or coalitions.*

NTIA should establish reporting requirements and methods for grantees that explicitly include soliciting and incorporating input from those most impacted by the digital divide. For example, grantees could provide regular progress reports that include input from community members, as well as a summary of how grantees solicited this input and responded to it.

To promote sustainability, NTIA should encourage collaborations, partnerships, and coalitions among grantees, key stakeholders, local communities, and Covered Populations beyond the planning and implementation process and investments in such efforts. While collaborations are crucial for advancing digital equity goals as they allow for greater

efficiency, expanded reach, and collective impact, they also require additional work and resources: partners must agree on common goals and specific activities and share an understanding of the complexities of each others' systems, and staff expertise and capacity must be dedicated to leading and facilitating the collaborative process and ensuring accountability.

Examples of existing impactful collaborations include:

- Partnerships between community-based organizations and local government agencies to increase digital literacy and access to affordable broadband, such as:
 - Examples include [digital navigator projects across the country](#) and
 - A recent collaboration between the City of Boston's Mayor's Office of Workforce Development, twenty-five local adult education programs, and World Education, where the City invested in the design and program completion of a comprehensive digital needs assessment and action plan process, as well as individualized coaching throughout;
- National, state, and local coalitions of community organizations, workforce development providers, technology providers, and government agencies working together to advocate for policies, share best practices and resources, and conduct research related to digital equity, such as [Digital US](#) and the [National Digital Inclusion Alliance](#); and
- The U.S. Department of Education-funded [Enhancing Access for Refugees and New Americans \(EARN\)](#) and the privately-funded [Transforming Immigrant Digital Equity \(TIDE\)](#) projects, both of which demonstrate how different stakeholder sectors serving the same target population can collaborate across the complexities of their respective systems and learn from each other in order to achieve a common goal.

Question 7: *What rules, if any, should the Assistant Secretary develop to ensure that digital equity is achieved in the Capacity Grant Program?*

NTIA should consider moving towards a nationwide alignment of digital inclusion measures instead of relying on States to decide on measurements for themselves. However, to ensure equity for all individuals, this standardization should not involve standardized testing or solely focus on employment or postsecondary enrollment. Standardized testing and solely employment and education-focused measures can disadvantage individuals from underrepresented and marginalized communities, including members of Covered Populations, who may have different needs, barriers, and priorities with regard to digital equity. Instead, it is important to consider the wide range of factors and indicators that are

meaningful and relevant to the communities being served. A menu of metrics for each objective that States can choose from – and report disaggregated data by Covered Population within – will support flexibility for States while allowing NTIA and key stakeholders to compare the impact of strategies being implemented across different states.

Standardization could include the following:

- A minimum amount of a State's Capacity Grant funds should be required to be used for something other than broadband infrastructure costs;
- A minimum number of individuals from Covered Populations should receive digital literacy instruction, appropriate devices, and reliable, affordable, high-speed connectivity for a specified number of years. Because individuals from covered populations may fall into more than one category (intersectionality), NTIA should provide guidance on how to track and count individuals.
- Require states to collect, analyze and publish disaggregated data on who is left behind in order to inform the design of targeted solutions to address those challenges and the development of responsive and tailored policies and interventions in strategic areas such as education and job training, employment, health, childcare, transportation, housing, etc.
- Any activities carried out under the Digital Equity Act, as well as public communications about these activities, should be inclusive and accessible to individuals with disabilities and individuals with language barriers. Funding should be made available to States – or States should reallocate at least a stated minimum of their Capacity Grant funds – to provide assistive technologies, reasonable accommodations, translation and interpretation, and other supports;
- A minimum amount of a State's Capacity Grant funds should be used for the professional development of digital literacy instructors working with different Covered Populations; and
- Best practices and lessons learned from different states as they continue this work should be shared through standardized, shared channels.

We also encourage NTIA to ensure that any technology tools, digital skills content, or other similar resources developed using public funding, including Digital Equity Act funding, are open-source. Ideally, these resources should be contributed to open-source repositories, such as the U.S. Department of Education's [LINCS](#) platform or World Education's [Digital Skills Library](#). The open-source approach can benefit a wide range of individuals, communities, and providers by supporting the cross-state sharing of free resources while allowing for customization to meet the needs of each State's Covered Populations, as well as promoting collaboration in developing digital inclusion tools and content.

C. Digital Equity Competitive Grant Program

Question 8: *How should NTIA define success for the Competitive Grant Program? What outcomes are most important to measure? 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.*

Measures of success and prioritized outcomes should align in most ways with those of the Capacity Grant Program so that the data provided can be compared and analyzed equally across the two programs.

For example:

- The extent to which the State Digital Equity Plan’s implementation has effectively addressed the unique needs of each Covered Population; and
- The economic, educational, health, and civic and social engagement impacts of any implemented activities on the lives of members of Covered Populations, including but not limited to their ability to obtain and retain employment with family-sustaining wages, work remotely, participate in online learning and upskilling opportunities, access healthcare, safely participate in and use online banking services, and engage in civic and community activities.

Please refer to our response to Question 3 for our other recommendations regarding measures of success for the Capacity Grant Program.

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?*

The Assistant Secretary should consider the following kinds of activities and projects to be eligible for the Competitive Grant Program:

- Direct service projects and activities (i.e., digital inclusion services for Covered Populations);
- Technical assistance and capacity-building projects and activities to support the design, implementation, and expansion of the above;
- Development of standardized measures of digital inclusion and relevant assessment methods, especially those with a focus on specific Covered Populations;

- Research and evaluation projects and activities regarding digital inclusion as it relates to Covered Populations and the impact of State Digital Equity Plans;
 - Projects and activities that occur on the national level or that span multiple states; and
 - The establishment and management of a community of practice for all grantees that promotes and records peer learning, supports synergistic impacts of activities, and informs NTIA and the field on the next steps following the conclusion of DEA activities.
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I. Competitive Program Rules

Question 11: *What rules, if any, should the Assistant Secretary develop to ensure that digital equity is achieved in the Competitive Grant Program?*

As with the Capacity Grant Program, NTIA should consider setting consistent digital inclusion measures to be used across all Competitive Grant Program grantees instead of relying on grantees to decide on measurements for themselves. However, to ensure equity for all individuals, this standardization should not involve standardized testing or solely focus on employment or postsecondary enrollment. Standardized testing and solely employment and education-focused measures can disadvantage individuals from underrepresented and marginalized communities, including members of Covered Populations, who may have different needs, barriers, and priorities with regard to digital equity. Instead, it is important to consider the wide range of factors and indicators that are meaningful and relevant to the communities being served. A menu of metrics for each objective that grantees can choose from – and report disaggregated data by Covered Populations within – will support flexibility for grantees while allowing NTIA to compare the impact of strategies being implemented across different projects and activities.

2. Competitive Program Grant Scoring

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 consider giving additional weight to proposed projects that align with State, Territory, and/or Tribal entity Digital Equity Plans since these plans will have already outlined strategies and priorities for achieving digital equity in their specific contexts. Projects aligned with State Digital Equity Plans and coordinated with their listed activities are more likely to have a greater impact on Covered Populations (and accelerate their progress towards specific outcomes), and Competitive Grant Program grantees will be able

to leverage existing successes and resources. This strategy also promotes a collaborative, synergistic approach to addressing digital equity issues and helps avoid any duplication of efforts.

D. Measuring for Success & Transformative Impact

I. Program Measurement, Evaluation, and Reporting

Question 16: *How should grantees define digital equity with respect to each of the Covered Populations? What does success look like for each of the Covered Populations? How should NTIA measure the effects of access to and adoption of and meaningful use of the internet for each Covered Population? What examples of equity gap analysis and tools should the Assistant Secretary consider when measuring outcomes as they relate to each Covered Population? 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.*

Grantees should define digital equity for each of the Covered Populations as the condition in which members of the respective Covered Population have the connectivity, devices, and digital skills they need in order to participate in the society and economy of the U.S. in the way they want and choose to. This definition includes identifying, recognizing, understanding, and mitigating on a systems level the unique barriers and challenges each Covered Population faces in accessing and effectively using the internet and appropriate devices to fulfill a variety of unique needs and goals, including but not limited to communicating with friends and family, obtaining and retaining employment with family-sustaining wages, working remotely, participating in online learning and upskilling opportunities, accessing healthcare, safely participating in and using online banking services, and engaging in civic and community activities.

Question 17: *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? What publicly available datasets and tools should NTIA and grantees (e.g., States, Territories, non-profits) develop, enhance or support to benchmark and to track progress of grantee goals and objectives?*

To create a vibrant digital equity ecosystem to measure program effectiveness and effects for Covered Populations, we see the need to address the current significant gaps in data, including:

1. Lack of clarity and the need for guidance on the specific digital skill sets required for different Covered Populations and other demographics.

Before assessing the impact of digital skills development, it is essential to have clarity and guidance on the specific digital skill sets required for different Covered Populations and other demographics. As one example, the federally funded [Digital Resilience in the American Workforce \(DRAW\)](#) initiative developed a [skills checklist](#) for the [Seattle Digital Equity Initiative Digital Skills Framework](#) to define the specific digital skills required for different types of learners (e.g., senior citizens, parents) and goals (e.g., employment, education).

The DRAW initiative also conducted a landscape scan, [Advancing Access and Digital Skills: DRAW Detailed Findings and Discussion](#), last year to identify effective approaches and existing resources supporting digital skills development in adult education. The scan highlighted efforts to promote digital access and equity, skill assessments, and professional development for practitioners and analyzed the challenges, gaps, and opportunities in assessing foundational digital skill development.

Clarity and guidance on specific digital skill sets for different populations will allow for the development of more authentic measurement tools instead of just standardized tests. For example, for its international work, World Education has adopted the European Union's [Digital Competence Framework for Citizens \(DigComp 2.2\)](#) as it was found to be the most comprehensive framework for digital skills, with various accompanying resources such as open assessments and curriculum, an online community for countries to partner and share resources (including resources in various languages) on digital skills development. DigComp 2.2 provides guidance on skills progressions, makes stronger connections between digital skills and employer needs, and provides more guidance to digital skills providers around the knowledge, skills, and attitudes needed to be digitally literate. World Education sees a framework such as DigComp 2.2 and the existing assessments aligned to it as a significant opportunity for creating a national digital skills framework for the U.S.

2. Lack of research in the context of teaching and learning digital literacy and adult education.

While teachers may have a clear understanding of what works well for their students, it is crucial to acknowledge that there is a lack of research in the areas of teaching and learning, particularly in the context of digital literacy and adult education.

While effective instructional approaches and practices have been identified through literature reviews, learner and educator interviews, and questionnaires, it is challenging to

advocate for policy changes and secure funding without empirical evidence of their effectiveness. The year-old [Collaborative Research for Educating Adults with Technology Enhancements \(CREATE\) Adult Skills Network](#), a research initiative funded by the Institute for Education Sciences, U.S. Department of Education, is an example of the scope and quality of investment in such research that is needed.

It is important to conduct more studies to evaluate instructional practices in digital literacy and determine the conditions under which different strategies and resources work best for different Covered Populations. Empirical studies can provide the necessary evidence to support adult learners in developing digital literacy skills and achieving positive outcomes.

3. Lack of data regarding the connections between education and training, and employers and the job market.

The forthcoming results from the [Programme for the International Assessment of Adult Competencies \(PIAAC\) Second Cycle of the Survey of Adult Skills](#) to be published in 2024 can be helpful. The survey was given to 5000 adults in each of 40 countries to measure cognitive and workplace skills adults need to fully participate in work and daily life. The survey responses will support the analysis of participants' information-processing skills and a range of variables. The dataset will be open to any organization or research seeking to investigate the quality and effectiveness of policy at the state and national levels by illustrating the following:

- How well education and training systems are performing;
- The degree of and different aspects of illiteracy and inadequate literacy skills;
- Disparities between job markets and education and training systems;
- Equality in access to education and mobility between generations;
- The process of young people transitioning from education to employment;
- Identifying groups that are at risk of being left behind; and
- Connections between crucial cognitive skills and factors like demographics, education history, and health.

However, PIAAC is an international dataset, and there remains a pressing need for data on the U.S. level, especially as it relates to Covered Populations, digital skills, and their connections to education and employment in the U.S.

Question 18: *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? To what extent should NTIA require standardized inputs, metrics, and measures in order to facilitate nationwide insights?

NTIA should provide technical assistance and resources to grantees to support the comprehensive and equitable collection and analysis of data on at least an annual basis.

Standardized inputs, metrics, and measures can facilitate nationwide insights and support comparative analyses across grantees. However, NTIA should ensure that any standardized measures are relevant and meaningful for the Covered Populations and do not perpetuate existing inequities or biases. NTIA should also provide clear guidance on how to interpret and contextualize the standardized measures to ensure that they accurately reflect each Covered Population's unique needs and experiences.

NTIA should consider requiring grantees to include qualitative data collection methods such as community-based participatory research. These methods would ensure that grantees gather feedback directly from Covered Populations on the effectiveness of projects and that their thoughts and experiences are included in any reporting to NTIA.

2. Digital Equity Strategies, Tactics, and Success Measures for Covered Populations

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?*

In thinking of strategies, tactics, projects, and programs to serve Covered Populations, it is critical to recognize and address the impact of intersectionality. For example, the overwhelming majority of adult learners are not only individuals with a language barrier but also individuals who are members of racial or ethnic minorities, incarcerated individuals, individuals with disabilities, and aging individuals. Thus, while there are some general strategies and programs all Covered Populations can benefit from, each Covered Population and each overlap of Covered Populations will additionally benefit from specific approaches and adaptations to mitigate their barriers to digital equity.

Covered Populations can benefit from:

- Affordable access to reliable, high-speed internet, whether via a continuation or expansion of the Affordable Connectivity Program or a similar federally funded initiative;
- Access to affordable or free devices that are appropriate for individuals' personalized needs and goals;

- Accessible digital literacy instruction that addresses individuals’ personalized needs and goals, with in-person, online, synchronous, and asynchronous options;
- Access to [Digital Navigator](#) services that are culturally responsive and attuned to the needs of the target Covered Population(s) and local community (for example, telehealth support for aging individuals, services provided at home for individuals with disabilities, support in multiple languages for individuals with a language barrier, and services provided over the phone for individuals residing in rural areas);
- Public computing centers where individuals can not only access devices and reliable, high-speed connectivity but also technical support, digital literacy instruction, and on-demand Digital Navigator support services;
- Investment in and implementation of wraparound services to enable individuals’ access to digital literacy instruction and Digital Navigator services and ensure that they can make the best use of the digital inclusion services they receive;
- Investing in “no wrong door” infrastructures so that access to digital inclusion and related support services is available and consistent regardless of an individual’s access point;
- Ongoing outreach to understand the specific needs and barriers of Covered Populations as they evolve; and
- Free digital inclusion resources that are designed to be inclusive of all Covered Populations, including individuals with a language barrier (for example, resources that reflect the context and the diversity of the local community, professionally translated and localized content).

This list is not exhaustive.

Question 20: *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 adults?*

Adult education services funded by Title II of the Workforce Innovation and Opportunity Act (WIOA) often serve young adults. These services encompass classes for adults seeking to earn a high school diploma or equivalent, adult basic education classes, English for Speakers of Other Languages (ESOL) classes, education and career advising, and workforce preparation activities. Most Title II services also provide digital literacy instruction, whether through explicit instruction or integrated into existing classes.

Investing in Title II services via BEAD and DEA funding can therefore be critical to supporting young adults' education, earning opportunities, and digital skills building, and their outcomes should be considered when measuring the effects of these investments.

Question 21: *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? 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.*

To promote a baseline standard for digital literacy for all learners, NTIA should promote clear frameworks with defined skills progressions across different proficiency levels and around associated knowledge, skills, and attitudes. For example, the [Digital Competence Framework for Citizens \(DigComp 2.2\)](#), which is used in the European Union, provides a common understanding of digital skills and digital competence for both educators and policymakers, with the intent of supporting not only digital skills curriculum development and assessment but also policy-making around digital skills building. DigComp 2.2 breaks down digital literacy into five key areas:

1. Information and data literacy
2. Communication and collaboration
3. Digital content creation
4. Safety
5. Problem-solving³

Each of these areas is further comprised of knowledge (concepts and facts), skills (ability to apply knowledge), and attitudes (dispositions, values, priorities).⁴

For any standards or frameworks promoted, NTIA should provide guidance around addressing the differing skills, needs, and attitudes of different types of learners. As one example, the federally funded [Digital Resilience in the American Workforce \(DRAW\)](#) initiative developed a [skills checklist](#) for the [Seattle Digital Equity Initiative Digital Skills Framework](#) to define the specific digital skills required for different types of learners (e.g., senior citizens, parents) and goals (e.g., employment, education).

³ <https://op.europa.eu/s/yCMY> (p. 4)

⁴ <https://op.europa.eu/s/yCMY> (p. 3)

E. Ensuring That Equity Is Achieved in BEAD

Question 22: *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? 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?*

To ensure States and Territories' BEAD and DEA efforts are aligned and closing equity gaps for all Covered Populations, NTIA can promote sharing of foundational knowledge, expertise, partnerships, and relevant data across stakeholder sectors, including State agencies and communities, in a systematized way in each state. I.e., those engaged in broadband infrastructure work will benefit from understanding the imperative behind and the impact of digital equity work, and vice versa. This system-wide sharing could help break down the silos and begin to close the knowledge gaps that currently exist between BEAD and DEA stakeholders, despite both groups working towards ultimately overlapping goals.

NTIA can also promote guidance and tools that clearly outline the alignment between BEAD and DEA so that both States and communities understand their overlapping impact and anticipated outcomes. For example, the National Digital Inclusion Alliance's [State Digital Equity Plan Toolkit](#) includes a worksheet for States on BEAD and DEA alignment, with recommendations on how to do so (Appendix C). As an additional step, states could release an adapted, public version of their completed worksheet so that Underrepresented Communities and Covered Populations understand the work being undertaken and at which points their feedback will be welcomed and implemented.

F. Ensure Workforce and Subcontracting Opportunities Are Inclusive of Underrepresented Communities/Covered Populations

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)?*

To support and advance the economic mobility of members of Underrepresented Communities and Covered Populations, the diversity of their assets, needs, and barriers must be recognized and addressed appropriately.

For example, for individuals with a language barrier, economic advancement opportunities must take into account “cultural background, length of residence, prior education, first language literacy, digital literacy in learners’ first language, and English language proficiency.”⁵ In contrast, incarcerated individuals face challenges to employment upon release due to the lack of access to devices and internet access they have while incarcerated.⁶ While workforce development programs can integrate digital skills development to accelerate outcomes for these communities and populations overall, programs also need to target the strengths and challenges unique to each group in order to truly be successful.

Whether taught through instruction in new skills or upskilling and re-skilling opportunities, transferable digital skills⁷ are critical. According to the [Digital Resilience in the American Workforce \(DRAW\)](#) project, “Due to the rapid nature of change in industry-specific technologies, many employers are focused on finding workers who are comfortable with a broad range of digital technologies. A key implication of this phenomenon for policymakers is that investing in occupational digital literacy should focus more on opportunities for workers to build industry-specific and also transferable skills.”⁸ Workforce development programs teaching digital skills should also ensure that their instruction goes beyond traditional computer skills to the skills needed to use mobile apps, tablets, and other devices and digital interfaces that are used day-to-day in the workplace.⁹

Question 24: *How can the BEAD and Digital Equity Programs support and promote youth employment and skills building? 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?*

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<https://worlded.org/resource/digital-resilience-in-the-american-workforce-instructional-approaches-and-practices/> (pp. 21-22)

6

<https://worlded.org/resource/digital-resilience-in-the-american-workforce-instructional-approaches-and-practices/> (p. 23)

⁷ We define *digital resilience* as having the awareness, skills, agility, and confidence to be empowered users of new technologies and adapt to changing digital skill demands.

8

<https://worlded.org/resource/a-holistic-understanding-of-skills-draw-detailed-findings-and-discussion/> (p. 7)

9

<https://worlded.org/resource/a-holistic-understanding-of-skills-draw-detailed-findings-and-discussion/> (p. 7)

The BEAD and Digital Equity Programs can support and promote youth employment and skills building by supporting programs, projects, and partnerships that focus on building digital skills relevant to the modern-day workforce. Workforce-relevant digital skills include a wide range of competencies, such as basic computer literacy, coding and programming, data analysis, cybersecurity, digital marketing, graphic design, and social media management. These skills are increasingly in demand in many industries, including healthcare, finance, education, and manufacturing. Additionally, beyond technical skills, workplace success skills such as collaboration, communication, problem-solving, and critical thinking continue to be critical for success in the digital workforce.

[The Personal & Workplace Success Skills Library](#) is a curated collection of high-quality resources to guide the integration of personal and workplace success skills into curriculum and instruction, advising and coaching, assessment, and program design. Personal and workplace success skills are transferable skills that are critical for finding employment and advancing in a career pathway. They are also lifelong learning skills that enable learners to be resilient and adaptive in an ever-changing labor market and are in increasingly high demand by employers across all industry sectors. The Library is a valuable resource for workforce development, career and technical education, higher education, and adult education programs serving youth and adult learners and workers, including those who are English language learners.

WEI thanks the U.S. Department of Commerce for the opportunity to present our comments in response to the Digital Equity Act of 2021 Request for Comments.

Contact

Priyanka Sharma
Vice President, US Division
priyanka_sharma@worlded.org



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