

Adult Learners and Immigrants in State Digital Equity Plans

An Analysis of Ten State Digital Equity Plan Drafts

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WORLD EDUCATION
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INTRODUCTION

This report examines the drafts of ten State Digital Equity Plans with a focus on the meaningful inclusion of adult education and immigrant inclusion.

The overwhelming majority of adult learners and immigrants are members of multiple covered populations prioritized under the Digital Equity Act of 2021. As trusted and experienced providers, both adult education programs and immigrant serving organizations are critical to closing the digital divide for individuals with a language barrier.

In this analysis, we aim to:

Identify how state digital inclusion activities will serve adult learners and immigrants;

1. Identify how adult education and immigrant inclusion organizations serve as implementation partners, community outreach partners, and subject matter experts in state digital inclusion activities; and
2. Highlight innovative and collaborative best practices for serving adult learners and immigrants, especially as states begin planning for the State Digital Equity Capacity Grant.
3. The analysis is organized into three sections: profiles on individual State Digital Equity Plans, a cross-state comparison, and recommendations and opportunities for future work.

The Digital Equity Act

Passed as part of the Infrastructure Investment and Jobs Act of 2021, the **Digital Equity Act** is the most significant federal investment in digital equity and inclusion in the U.S. to date. The Digital Equity Act establishes three programs to close the digital divide for underserved communities across the country:

1. The State Digital Equity Planning Grant, which allocates funding to states to draft a Digital Equity Plan.
2. The State Digital Equity Capacity Grant, which allocates funding to states to implement their Digital Equity Plans.
3. The Digital Equity Competitive Grant, which allocates funding to eligible entities to implement digital inclusion activities.

Covered Populations

The Digital Equity Act prioritizes eight *covered populations*:

1. Individuals who live in households with an annual income that is at or below 150% of the federal poverty level;
2. Aging individuals (60 years of age or older);
3. Incarcerated individuals, other than individuals who are incarcerated in a federal correctional facility;
4. Veterans;
5. Individuals with disabilities;

6. Individuals with a language barrier, including individuals who are English learners or have low levels of literacy;
7. Individuals who are members of a racial or ethnic minority group; and
8. Individuals who primarily reside in a rural area.

Measurable Objectives for Digital Inclusion

As part of their Digital Equity Plans, states must draft measurable objectives for documenting and promoting the following for each covered population:

1. The availability of and affordability of access to broadband service;
2. The online accessibility and inclusivity of public resources and services;
3. Digital literacy;
4. Individual awareness and use of measures to secure online privacy and cybersecurity; and
5. The availability and affordability of consumer devices and technical support for those devices.

Key Stakeholders

In their State Digital Equity Plans, states must describe how they plan to collaborate with key stakeholders, including the following:

1. Community anchor institutions;
2. County and municipal governments;
3. Local educational agencies;
4. Indian Tribes, Alaska Native entities, or Native Hawaiian organizations (where applicable);
5. Nonprofit organizations;
6. Organizations representing covered populations;
7. Civil rights organizations;
8. Entities that carry out workforce development programs;
9. State agencies responsible for administering or supervising adult education and literacy activities;
10. Public housing authorities;
11. Partnerships between any of the above.

Methodology

We selected the following states based on a set of considerations:

- | | |
|-----------------|-------------|
| • Colorado | • Minnesota |
| • Georgia | • Nevada |
| • Hawai'i | • New York |
| • Maryland | • Ohio |
| • Massachusetts | • Virginia |

First, we excluded any state that had not yet published its State Digital Equity Plan draft by the start of our analysis in late November 2023. Then we considered equally 1) the size of the state's immigrant population, 2) measures of digital access for the state's immigrant population, and 3) geographical representation. Lastly, we included the three states represented by the pilot sites in World Education's **Transforming Immigrant Digital Equity (TIDE)** project, namely Colorado, Massachusetts, and Virginia.

When considering the size of the immigrant population, we reviewed the 25 states with the greatest number of immigrants.¹ We also examined two measures of digital equity in the state, based on a recent Migration Policy Institute analysis of American Community Survey data:²

1. The percentage of adults in each state who were identified as limited English proficient (LEP), had low incomes, did not have high school diplomas, and *did not have internet access in their households*; and
2. The percentage of adults in each state who were identified as LEP, had low incomes, did not have high school diplomas, and *did not have computers or laptops in their households*.

We considered these two measures for each of the 25 states with the greatest number of immigrants, focusing on the states that had a higher percentage in either metric. That is, we were more interested in examining Digital Equity Plans for states that were highlighted as having higher levels of digital inequity for immigrants.

As we progressed in our analysis, we factored in an additional measure on the digital skills gap for unemployed individuals, in recognition of the critical role that State adult education systems have in closing the digital skills divide and meeting state and local workforce needs.³

Our third consideration was geographical representation. We included states from each of the four U.S. Census regions: Northeast, Midwest, South, and West.

As exceptions to the above rationale, we included the three states represented by the pilot sites in World Education's TIDE project: Colorado, Massachusetts, and Virginia. From May 2022 to December 2023, World Education (WE) partnered with an entity from each of these states to pilot **an equitable English language learning and digital resilience ecosystem model** that centers adult immigrant and refugee learners and aims to expand their access to English for Speakers of Other Languages (ESOL), digital inclusion, and immigrant inclusion services. In addition, WE provided ongoing guidance on Digital Equity Act advocacy in their states. We seek to understand the resultant impact of our collective advocacy efforts to support the meaningful inclusion of adult learners and immigrants in these three state plans.

The TIDE Project Pilot Sites

1. The **Colorado Department of Labor and Employment's Office of the Future of Work**, the State office leading Digital Equity Act implementation in Colorado
2. **Holyoke Community College**, whose ESOL Program spans multiple cities in Western Massachusetts
3. **Literacy for Life**, a community-based adult literacy program serving Williamsburg, Newport News, and Hampton, Virginia

Defining Individuals with a Language Barrier, Adult Learners, and Immigrants

While individuals with a language barrier are a covered population under the Digital Equity Act, adult learners and immigrants are not. The Digital Equity Act defines *individuals with a language barrier* as *individuals who are English learners [or] have low levels of literacy*. In the 2021-2022 program year, 92% of learners served by State adult education systems self-identified that their being an English language learner, having a low literacy level, and/or having cultural barriers was a barrier to employment.⁴ For this reason, we considered individuals with a language barrier to be a proxy for adult learners in our analysis. We also note when a state interprets the definition of *individuals with a language barrier* differently from what is in the Digital Equity Act.

English learners and *English language learners* both refer to individuals who have a native language other than English and limited English proficiency. While we use these terms interchangeably, states have different preferences regarding their usage. Where possible, we use the term preferred by the state.

In contrast, *individuals with low levels of literacy* refers to individuals who are native speakers of English but do not have a functional level of English reading, writing, or speaking.

In our definition of immigrants, we include all those identified as immigrants regardless of legal status, including naturalized U.S. citizens, lawful permanent residents, refugees, asylees, migrants, undocumented immigrants, and all other individuals who were not U.S. citizens at birth.

Definitions

Individuals with a language barrier: Individuals who are English language learners or have low levels of literacy.

English learners (or English language learners): Individuals who have a native language other than English and limited English proficiency. English learners are not necessarily immigrants.

Individuals with low levels of literacy: Individuals who are native speakers of English but do not have a functional level of English reading, writing, or speaking.

Immigrants: All immigrants, regardless of legal status, including naturalized U.S. citizens, lawful permanent residents, refugees, asylees, migrants, undocumented immigrants, and all other individuals who were not U.S. citizens at birth. Immigrants are not necessarily English learners.

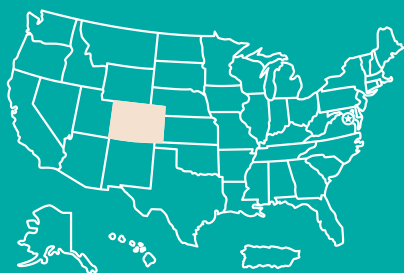
As states progress in their digital inclusion work, it is critical to recognize that adult learners and immigrants are overlapping but different populations, facing overlapping but different barriers. Individuals with a language barrier or English language learners are not necessarily immigrants (e.g., Puerto Ricans), and immigrants are not necessarily individuals with a language barrier (e.g., internationally trained professionals emigrating from English-speaking countries). In our analysis, we seek to understand how states will address each population differently in recognition of their unique assets, needs, and challenges.

¹ “Immigrant Population by State.”

² Hofstetter and McHugh, *Leveraging Data*.

³ “Digital Equity Scorecard.”

⁴ “Table SPR.”



STATE ANALYSIS: COLORADO

Digital Equity Plan Name

Colorado Digital Access Plan

Digital Equity Act Administering Entity

The **Office of the Future of Work (OFW)** in the Colorado Department of Labor and Employment, in collaboration with the **Office of eHealth Innovation**

Digital Equity Plan Public Comment Period

December 15, 2023 – January 19, 2024

Digital Divide Snapshot

18.1%

18.1% of Coloradans lack access to high-speed broadband at home, and 4.3% of Coloradans do not have access to home internet at all.⁶

8.4%

8.4% of Coloradans do not have access to a computer.⁷

65,918

Of the 199,752 unemployed individuals in Colorado, an estimated 65,918 do not have foundational digital skills.⁸

Spanning cities, rural and mountain regions, and Tribal lands, Colorado faces many area-specific barriers to closing the digital divide for all of its residents.

Adult Education

In Colorado, the State adult education system is overseen by the **Office of Adult Education Initiatives (AEI)** in the Colorado Department of Education. In 2022, the system comprised a network of five community-based organizations, three local education agencies, three community and technical colleges, two libraries, and one four-year college or university. AEI distributed \$6.7 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding to these providers.⁹

Needs and Challenges for Individuals with a Language Barrier

Drawing on multiple sources of data, including input from **Digital Equity Committee** members and responses to the Statewide Digital Equity Survey, the Colorado Digital Access Plan identifies several needs and challenges specific to individuals with language barriers. Additionally, the plan recognizes the differences in needs and challenges between those with limited English proficiency and those with low levels of literacy. For example, individuals with limited English proficiency may have difficulties learning the terminology used to describe technology, and some individuals may not be literate in their first language. In contrast, individuals with low levels of literacy may feel shame when accessing services and resources that assume all Americans are literate, and those with challenges such as dyslexia require a different instructional approach (p. 92).¹⁰

Individuals with a language barrier are also disproportionately affected by gaps in digital access, affordability, and adoption. For example:

- “[T]hose who speak a language other than English at home were almost twice as likely to lack internet at home” (p. 92).
- “Those with limited language proficiency are the least informed about the Affordable Connectivity Program” (p. 93).
- “Roughly 15% of Statewide Digital Equity Survey respondents with limited English proficiency reported having a desktop at home – the lowest of any other covered population group surveyed” (p. 92).
- “Respondents to the Statewide Digital Equity Survey [with] limited English proficiency reported less confidence in several online tasks in comparison to all respondents” (p. 92) and “reported less confidence in cybersecurity practices than all respondents” (p. 93).

Plan Development

Several adult education providers were recognized as collaborators on the Colorado Digital Access Plan, including the Community College of Aurora’s Community ESL Program, Focus Points Family Resource Center, the Montrose Adult Education Center, and the Learning Source (p. 117). These collaborations happened at multiple levels, ranging from providing input to being part of the Digital Equity Committee.

Through a connection by World Education, the OFW met with AEI, its grantees, and related organizations in February 2023. The eight attendees discussed their adult learners’ needs and explored opportunities to effectively collaborate. In June 2023, the OFW followed up by holding a meeting specifically for adult education programs on how to provide input on the Digital Access Plan.

As a result of this engagement, multiple providers joined the Digital Equity Committee to help inform the plan's development. In a conversation with World Education, the OFW noted that adult education providers are more heavily represented on the Digital Equity Committee than organizations serving other covered populations. The Digital Equity Committee discussed the needs and challenges of individuals with a language barrier during their May 2023 meeting¹¹, and the notes from the breakout sessions later informed the identification and description of barriers in the plan (p. 96). One provider, the Community College of Aurora's Community ESL Program, was selected to join the Digital Equity Working Group, which contributed to the plan's mission, vision, strategies, research, and writing (p. 98).

The Colorado Digital Access Plan also recognizes the connections – both current and potential – between adult education and digital inclusion. For example, AEI oversees the implementation of Northstar Digital Literacy in Colorado Workforce Centers and adult education programs (p. 13). As another example, The Learning Source, the oldest and largest adult education nonprofit in the state, is cited for its work as one of two grantees participating in Colorado's digital navigator pilot program, which started in the fall of 2023 (p. 41).

To solicit input from members of covered populations, the OFW recruited community-based organizations to support residents in completing the Statewide Digital Equity Survey and to conduct community listening sessions. The survey was available in 22 languages, online and on paper. The OFW also collaborated with Comcast to air a public service announcement in Spanish to promote the survey (p. 60). Of those who completed the survey, 18% of online respondents and 22% of paper respondents identified as individuals with limited English proficiency, in comparison to 13% of all Coloradans (p. 61). With regard to listening sessions, the plan reports that all covered populations were represented (p. 64), although it is not stated if adult education providers were involved in hosting or recruiting learners for the sessions.

For its public comment period, the OFW released summaries of the plan in nine languages, and the online public comment form was available in 10. Nineteen community-based organizations hosted public comment sessions, ensuring outreach in ten languages other than English to all covered populations. At least one adult education provider, The Learning Source, was involved in hosting public comment sessions.¹²

Proposed Plan Implementation

The Colorado Digital Access Plan sets specific objectives to address the needs of those with language barriers. Several objectives and key performance indicators (KPIs) that refer to "all Coloradans" call out individuals with a language barrier as a target covered population, including those around affordable broadband access, affordable device access, accessing online resources, and protecting one's online information (pp. 33-35). These objectives and KPIs align with the gaps in digital inclusion identified for those with language barriers.

Drawing on input from the Digital Equity Committee and other data sources, the plan outlines some implementation strategies that will specifically benefit adult learners. For example, the OFW notes the importance of leveraging the Digital Navigator program to provide online privacy and cybersecurity tools and training to those with language barriers (p. 31), and even leveraging other types of navigators to ensure they have access to digital resources (p. 5). Additionally, these resources are best provided

in-person, whether through library-led programs or help desks (p. 56). On the workforce development side, a critical strategy for supporting affordable device access in rural communities will be the development of device refurbishing and technical support training programs at community colleges (p. 111). In general, however, implementation focuses on building and funding regional coalitions to support Colorado's digital equity ecosystem and promoting digital inclusion programming statewide (pp. 105-106), and adult education is not mentioned as an implementation partner.

Immigrant Inclusion

Colorado is home to 570,273 immigrants, who make up 9.8% of the state's population.¹³ According to the Migration Policy Institute, 44% of the Colorado immigrant population speaks English less than "very well."¹⁴ Among immigrant adults with limited English proficiency, 16% of households do not have access to the internet, and 32% of households do not have access to a computer or laptop.¹⁵

Needs and Challenges for Immigrants

Recognizing both the needs and challenges unique to the immigrant population and the high number of immigrants in Colorado, the Colorado Digital Access Plan establishes immigrants as an additional covered population. Importantly, the plan also acknowledges that the immigrant population in Colorado is not homogenous (p. 73), and that immigrants are not necessarily synonymous with individuals with language barriers: only 48% of immigrants responding to the Statewide Digital Equity Survey identified as individuals with limited English proficiency (p. 61).

While there is some overlap between the needs of immigrants, those of individuals with language barriers, and those of racial and ethnic minorities, the plan identifies additional factors in the experiences of Coloradan immigrants, including the adoption of sanctuary policies by some counties and cities, the recent surge of migrants arriving in Denver (p. 73), and the fears that come with being a member of a mixed-status family (p. 81). A connection to families back home is critical to supporting immigrants' mental health, along with other "protective factors" such as employment and education access and social supports – all of which can be supported by digital inclusion activities (p. 74). Also, in some immigrant families, children serve as translators for their adult family members, which is especially problematic when children are translating complex information (such as legal or health information) online (p. 92).

Immigrants are disproportionately affected by gaps in digital access, affordability, and adoption. For example:

- "[I]mmigrants are one of the three covered populations most likely to rely on mobile data plans for internet access" (p. 74).
- "62% of immigrants responding to the Statewide Digital Equity Survey reported the internet is too expensive" (p. 75).
- "56% [of immigrants] were unfamiliar with measures needed to stay safe online or didn't know what cybersecurity meant. Some shared they felt immigrants establishing their life in the U.S. are targets for scam attempts, yet instructions on how to protect themselves online are typically in English only" (p. 75).

Plan Development

Several immigrant serving organizations were recognized as collaborators on the Colorado Digital Access Plan, including the Colorado Office of New Americans (ONA), the Immigrant and Refugee Center of Northern Colorado, and Teach by Tech (p. 117). These collaborations happened at multiple levels, ranging from providing input to serving on the State Agency Working Group.

The ONA was part of the State Agency Working Group, a group of Colorado agencies that raised awareness of the Digital Equity Act, supported the development of the Digital Access Plan, and ensured the plan's alignment with existing state goals (pp. 94-95). To that end, the plan outlines multiple points of alignment with the ONA's goal of promoting the "successful economic, social, linguistic, and cultural integration of New Americans" (p. 25), as well as with the Colorado Refugee Services Program's goal of supporting the effective resettlement and integration of refugees in Colorado. For example, digital inclusion services can support immigrants and refugees in accessing educational opportunities like the ONA's Virtual, Career-Aligned English as a Second Language program, which provides career and sector-specific adult English language courses via English digital platforms (p. 25).

In addition, the OFW held a community engagement event for refugee employment stakeholders in June 2023. The OFW shared information about the Digital Access Plan, the Digital Navigator Program, the Digital Equity Ecosystem Mapping survey, and the Statewide Digital Equity Survey with 15 attendees (Appendix C).

To solicit input from members of covered populations, the OFW recruited community-based organizations to support residents in completing the Statewide Digital Equity Survey and to conduct community listening sessions. The survey was available in 22 languages, online and on paper. The OFW also collaborated with Comcast to air a public service announcement in Spanish to promote the survey (p. 60). Of those who completed the survey, 23% of online respondents and 28% of paper respondents identified as immigrants, in comparison to 10% of all Coloradans (p. 61). The online survey also received valid responses in 19 languages, with English, Spanish, and Chinese as the top three (p. 73). On the listening sessions, the plan reports that all covered populations were represented (p. 64), although it is not stated if immigrant serving organizations were involved in hosting or recruiting immigrants and refugees for the sessions.

For its public comment period, the OFW released summaries of the plan in nine languages, and the online public comment form was available in 10. Nineteen community-based organizations hosted public comment sessions, ensuring outreach in ten languages other than English to all covered populations. At least two immigrant serving organizations, Colorado Ethiopian Community and The Learning Source, were involved in hosting public comment sessions, and notably, the sessions at Eloise May Library (part of the Arapahoe Libraries system) provided interpretation in six languages between both sessions.¹⁶

Proposed Plan Implementation

The Colorado Digital Access Plan sets specific objectives to address the needs of immigrants. Several objectives and key performance indicators (KPIs) that refer to "all Coloradans" call out immigrants as a target covered population, including those around affordable broadband access and affordable device access (pp. 33-35). These objectives and KPIs align with the gaps in digital inclusion identified

for immigrants, although immigrants are not called out in the objective on protecting one's online information (p. 35).

The plan identifies some implementation strategies that will specifically benefit immigrants and refugees. For example, the second phase of the state's digital navigator pilot program will place four (preferably bilingual) digital navigators at immigrant serving organizations around the Denver metropolitan area.¹⁷ The Digital Equity Committee also noted the importance of community anchor institutions and community-based organizations in serving immigrants, as they not only provide connectivity but also help in-person and virtually (p. 56). In general, implementation focuses on building and funding regional coalitions to support Colorado's digital equity ecosystem and promoting digital inclusion programming statewide (pp. 105-106); however, immigrant serving organizations are not specified as implementation partners.

⁵ "Examining Gaps," 11.

⁶ "Examining Gaps," 9.

⁷ "Examining Gaps," 13.

⁸ "Digital Equity Scorecard: Colorado."

⁹ "Colorado Table 14."

¹⁰ Parenthetical citations in this section refer to the Colorado Digital Access Plan, which is included in the appendix.

¹¹ Colletti, "Digital Equity Committee."

¹² "Colorado Digital Access Plan."

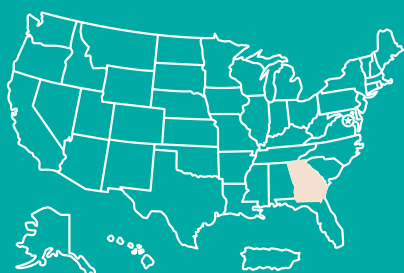
¹³ "Colorado - Demographics & Social."

¹⁴ "Colorado - Language & Education."

¹⁵ Hofstetter and McHugh, *Leveraging Data*.

¹⁶ "Colorado Digital Access Plan."

¹⁷ "Digital Navigator - Temporary Aide."



STATE ANALYSIS: GEORGIA

Digital Equity Plan Name	Georgia Digital Connectivity Plan
Digital Equity Act Administering Entity	Georgia Technology Authority (GTA)
Digital Equity Plan Public Comment Period	November 9, 2023 – December 8, 2023
Digital Divide Snapshot	<p>24.1% of Georgians lack access to high-speed broadband at home,¹⁸ and 9% of Georgians do not have access to home internet at all.¹⁹ Georgians in rural regions not only struggle to access internet service at home but also experience limited connectivity at community anchor institutions (p. 79)²⁰.</p> <hr/> <p>13.7% 13.7% of Georgians do not have access to a computer.²¹</p> <hr/> <p>75,966 Of the 230,200 unemployed individuals in Georgia, an estimated 75,966 do not have foundational digital skills.²²</p>

Adult Education

The State adult education system in Georgia is administered by the Technical College System of Georgia (TCSG)'s **Office of Adult Education**. In 2022, the system comprised a network of 22 community and technical colleges, four local education agencies, three community-based organizations, and one faith-based organization. The Office of Adult Education distributed \$19.8 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$16.6 million in state funding to these providers.²³

Needs and Challenges for Individuals with a Language Barrier

Based on the state's needs assessment, 23.6% of adults in Georgia struggle with low literacy, and 5.4% of the population are English language learners. The Georgia Digital Connectivity Plan recognizes that the challenges related to language barriers that these groups face compound issues with digital literacy and that addressing these interconnected barriers will require "efforts that encompass infrastructure expansion, affordable access, digital skills training, and targeted support" (p. 9).

The plan establishes "key activities like the creation of specialized guidebooks and toolkits and a digital skills framework that integrates financial literacy, online safety, and other essential professional skills" as fundamental in supporting "adult learners" specifically (p.4). However, little baseline data is available for individuals with a language barrier overall. For example, data is not available for how many people with language barriers have access to a working computer (p. 46), can effectively use the internet (p. 47), can access resources to ensure their online safety (p. 48), and can access government services (p. 51). That being said, GTA acknowledges that individuals with "significant" language barriers disproportionately lack access to broadband and states that it is developing data in partnership with other agencies (p. 78).

Looking at English learners alone, the plan identifies that they have a need for greater internet and device adoption and to protect their online safety and privacy but that their barriers to broadband availability and digital skills are "the same as those faced by other Georgians with similar needs" (p. 79).

Plan Development

GTA utilized diverse methods to engage the community, including public listening sessions, stakeholder workshops, a regional phone survey for residents, and online surveys and inventory tools for stakeholders. Additionally, GTA organized regional roundtables with stakeholders and individuals with lived experience, a statewide digital connectivity symposium, and monthly meetings with over 30 Digital Connectivity Advisory Committee members statewide. The committee comprises organizations representing covered populations, faith-based organizations, civil rights organizations, service providers, and more (p. 109). For adult education providers specifically, GTA presented on the Digital Connectivity Plan at the 2023 Coalition on Adult Basic Education (COABE) National Conference (p. 162).

While adult education is not directly mentioned, technical colleges and workforce development organizations both contributed to the development of the plan (p. 157). Additionally, the digital connectivity program inventory survey lists "workforce development and adult literacy organization" as a category for respondents, indicating that adult education providers are considered assets and potential partners in Georgia's digital connectivity efforts (p. 263).

GTA accepted public comments on the Georgia Digital Connectivity Plan via an online form and hosted one virtual public comment meeting in December 2023. GTA also provided instructions via email and phone to individuals in need of alternative ways to submit their comments. These engagement methods were offered in English only, and it is not stated whether adult education providers were involved in the public comment process.

Proposed Plan Implementation

The Georgia Digital Connectivity Plan recognizes the gap in digital literacy skills and knowledge as a significant factor hindering digital connectivity and notably states that “digital skills programming may be the most impactful intervention for increasing internet use in the State” (p. 93). The plan highlights the connections between digital skills-related implementation strategies and the TCSG’s educational outcomes. For example, TCSG plans to improve student retention and graduation rates by expanding online course offerings and to develop a competitive workforce by creating industry-specific micro-credentialing programs in cybersecurity (p. 25). These objectives align with the proposed strategies of developing a foundational digital skills framework (p. 38), supporting digital literacy through adult education platforms (also described as “career innovation platforms”) tailored to specific learning needs (p. 39), and training digital navigators to specialize in serving English learners (p. 41). In particular, the digital skills framework will integrate “financial literacy, online safety, and other essential professional skills to supporting...adult learners” (p. 4).

The plan also highlights adult education partners, such as workforce development training and certification programs that will support the upskilling, retraining, and placement of workers in digital connectivity-related jobs (p. 117). Similarly, the Georgia Department of Labor is cited for its plan to implement a distance learning program in eight rural career centers (p. 24).

Overall, GTA emphasizes the vital role of technical colleges, workforce, nonprofits, and community organizations in collectively promoting comprehensive digital literacy. Beyond workforce training and the integration of digital skills curricula into job training and placement services (p. 128), the plan states an intent to focus on multigenerational learning, wraparound services, and community boot camps (p. 126). Tailored digital skills programming alongside job training will specifically benefit individuals with a language barrier (p. 128). Further on, GTA also plans to establish peer-to-peer digital skills learning opportunities, noting that English learners, in particular, may benefit from the model because of the inherent trust and sense of community peer-to-peer models bring (p. 128).

Immigrant Inclusion

Georgia is home to 1,168,022 immigrants, who make up 10.7% of the state’s population.²⁴ Of the immigrant population, 40% speak English less than “very well.”²⁵ Among immigrant households with limited English proficiency, 19% lack access to the internet, and 32% lack access to a computer.²⁶

Needs and Challenges for Immigrants

Although immigrants and refugees are not mentioned in the Georgia Digital Connectivity Plan, the plan acknowledges that certain demographic groups face additional barriers to digital connectivity due to unfamiliarity with technology or language barriers (p. 140).

Plan Development

The plan does not indicate if immigrant serving organizations participated in the plan's development.

For the public comment process, GTA accepted comments via an online form and hosted one virtual public comment meeting in December 2023. GTA also provided instructions via email and phone to individuals in need of alternative ways to submit their comments. These engagement methods were offered in English only, and it is not stated whether immigrant serving organizations were involved in the public comment process.

Proposed Plan Implementation

While the Georgia Digital Connectivity Plan expresses a broad commitment to address the needs of individuals with language barriers, strategies for addressing the specific needs of immigrants and refugees are not included, and immigrant serving organizations are not explicitly mentioned as implementation partners.

¹⁸ “Examining Gaps,” 11.

¹⁹ “Examining Gaps,” 9.

²⁰ Parenthetical citations in this section refer to the Georgia Digital Connectivity Plan, which is included in the appendix.

²¹ “Examining Gaps,” 13.

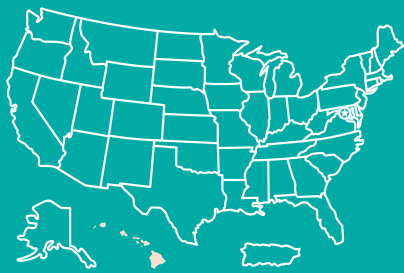
²² “Digital Equity Scorecard: Georgia.”

²³ “Georgia Table 14.”

²⁴ “Georgia - Demographics & Social.”

²⁵ “Georgia - Language & Education.”

²⁶ Hofstetter and McHugh, *Leveraging Data*.



STATE ANALYSIS: HAWAI'I

Digital Equity Plan Name

Hawai'i Digital Equity Plan

Digital Equity Act Administering Entity

The **Hawai'i Broadband & Digital Equity Office (HBDEO)**, in the Department of Business, Economic Development & Tourism

Digital Equity Plan Public Comment Period

October 2, 2023 – October 31, 2023

Digital Divide Snapshot

As a remote, primarily rural island state, Hawai'i faces many unique challenges with regard to digital access, affordability, and adoption. The State Legislature codified the **Hawai'i Digital Equity Declaration** in 2021 (p. 37)²⁷.

16.9%

16.9% of Hawai'i residents lack access to high-speed broadband at home²⁸, and 5.7% of Hawai'i residents do not have access to home internet at all.²⁹

10.7%

10.7% of Hawai'i residents do not have access to a computer.³⁰

16,800

Of the 50,910 unemployed individuals in Hawai'i, an estimated 16,800 do not have foundational digital skills.³¹

Adult Education

The State adult education system in Hawai'i is overseen by the **Hawai'i State Department of Education (DOE)**. Adult education classes are available at two Community Schools for Adults – McKinley Community School and Waipahu Community School – both of which have four satellite sites.³² Hawai'i DOE distributed \$2.4 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$4 million in state funding to these community schools in 2022.³³

Needs and Challenges for Individuals with a Language Barrier

The Hawai'i Digital Equity Plan recognizes the breadth and depth of digital needs and challenges that residents have overall, particularly those that are unique to the state. Individuals with a language barrier face additional complexities because not only are over 25 languages spoken across Hawai'i (pp. 31-32), but also many of them, such as Ilocano and Hawaiian, are not commonly spoken elsewhere in the United States (p. 77). Other barriers include a lack of access to in-language, online information about public transportation in order to access digital inclusion services (p. 54) and a lack of public outreach in languages other than English (p. 56).

Plan Development

To solicit input on the development of the Hawai'i Digital Equity Plan, HBDEO conducted 16 focus groups with individuals with a language barrier (p. 10). It is not stated if adult education providers were involved in planning and conducting these focus groups. HBDEO also tapped into the **Broadband Hui** – a statewide group of nonprofit, public sector, and private sector organizations that seeks to close the digital divide in Hawai'i – for community expertise.

The plan acknowledges the following assets and partners serving individuals with a language barrier: Hawai'i Literacy, a privately funded organization providing English as a Second Language (ESL) classes, adult literacy services, and multilingual digital literacy classes (p. 45); the state's public library system, which offers **Northstar Digital Literacy** training (p. 50); and workforce development agencies, which provide digital literacy programming (p. 115) and on-the-job digital skills training (p. 103). Notably, the overwhelming majority of organizations listed as primarily serving individuals with a language barrier in the state's **Digital Equity Asset Inventory** are Waipahu Community School and public libraries.

For the public comment period, HBDEO included brief summaries and graphics alongside the release of the Hawai'i Digital Equity Plan.³⁴ The public was invited to submit comments in English online and via mail, and hard copies of the public comment form were made available at all public libraries. It is not stated whether adult education providers were involved in spreading awareness about the public comment period and/or supporting adult learners in submitting public comments.

Proposed Plan Implementation

While the State adult education system is very rarely mentioned in the plan, some implementation strategies do target adult learners. As part of HBDEO's objective to prepare K-12 students to serve as digital navigators and digital literacy trainers for their communities, the Office plans to work with DOE "to target...adult education programs in multiple languages" (p. 105), potentially indicating both an in-demand career pathway opportunity and expanded digital navigator services for adult learners. HBDEO also plans to partner with American Job Centers and other workforce development agencies

in offering digital literacy training to support job opportunities, on-the-job training, and upskilling opportunities for covered populations (pp. 102-103).

In general, HBDEO states an intent to find innovative, culturally appropriate ways to meaningfully reach and serve individuals with a language barrier, with some specific action items outlined. For example, to provide digital literacy training to those with language barriers, the plan proposes having culturally and linguistically fluent instructors from the community record “how-to” videos that can be freely accessed by learners (p. 101) and recruiting bilingual/multilingual digital literacy trainers from the community to provide in-language assistance (p. 102). To ensure culturally competent outreach and communications to individuals with a language barrier, HBDEO also states an intent to partner with the Hawai‘i Office of Language Access (pp. 86-87) and to solicit input from agencies and community leaders to improve emergency notification, response, and recovery (pp. 112-113). However, adult education providers are not explicitly included as partners in these strategies.

Immigrant Inclusion

Hawai‘i is home to over 247,000 immigrants, making it the state with the eighth-highest share of immigrants at 17.1% of the state’s population.³⁵ According to the Migration Policy Institute, 47.4% speak English less than “very well.”³⁶ Among immigrant adults with limited English proficiency, 16% of households do not have access to the internet, and 29% of households do not have access to a computer or laptop.³⁷

Needs and Challenges for Immigrants

The Hawai‘i Digital Equity Plan recognizes immigrants as a “unique subset of ethnic minorities” (p. 33), acknowledging the impact of immigrants and migrant workers on the state’s culture, economy, and history. Immigrants also span multiple covered populations: “the island of Lana‘i is home to a strong Filipino community” because of the island’s history as a pineapple plantation, and “the remote Ocean View community on Hawai‘i Island is home to a diverse mix of impoverished, non-English speaking Micronesian and Marshallese immigrants” (p. 34). On top of the other challenges faced by individuals with a language barrier, the plan also notes that immigrants may lack a Social Security number or birth certificate (p. 11), making it difficult to access services like the [Affordable Connectivity Program \(ACP\)](#).

Plan Development

HBDEO conducted 16 focus groups with individuals with a language barrier (p. 10). At least one focus group was conducted with Hispanic immigrants (p. 20). It is not stated if immigrant serving organizations were involved in planning and conducting these focus groups. HBDEO also tapped into the [Broadband Hui](#) – a statewide group of nonprofit, public sector, and private sector organizations that seeks to close the digital divide in Hawai‘i – for community expertise.

From HBDEO’s community engagement efforts, Hawai‘i Literacy was the only organization identified as providing digital literacy services in languages other than English. Their classes are also taught in communities where many low-income immigrants and migrants live (p. 45). Additional immigrant serving organizations are included in the state’s [Digital Equity Asset Inventory](#), such as the Hawai‘i Coalition for Immigrant Rights and the Enlace Hispano program at Maui Economic Opportunity.

For the public comment period, HBDEO included brief summaries and graphics alongside the release of the Hawai'i Digital Equity Plan.³⁸ The public was invited to submit comments in English online and via mail, and hard copies of the public comment form were made available at all public libraries. It is not stated whether or not immigrant serving organizations were involved in spreading awareness about the public comment period and/or supporting immigrants and refugees in submitting public comments.

Proposed Plan Implementation

In addition to the actions proposed to address the needs of individuals with a language barrier, HBDEO also plans to offer digital skills training specifically for immigrants focused on 1) virtual communication tools like video conferencing apps to help families stay connected, and 2) immigration paperwork and applications for benefits (p. 101). The plan does not list specific immigrant serving organizations as implementation partners.

²⁷ Parenthetical citations in this section refer to the Hawai'i Digital Equity Plan, which is included in the appendix.

²⁸ "Examining Gaps," 11.

²⁹ "Examining Gaps," 9.

³⁰ "Examining Gaps," 13.

³¹ "Digital Equity Scorecard: Hawai'i."

³² "Adult Education."

³³ "Hawaii Table 14."

³⁴ "Hawai'i Digital Equity Plan."

³⁵ "Hawaii - Demographics & Social."

³⁶ "Hawaii - Language & Education."

³⁷ Hofstetter and McHugh, *Leveraging Data*.

³⁸ "Hawai'i Digital Equity Plan."



STATE ANALYSIS: MARYLAND

Digital Equity Plan Name

Maryland Statewide Digital Equity Plan

Digital Equity Act Administering Entity

The **Office of Statewide Broadband (OSB)**, in the Maryland Department of Housing and Community Development

Digital Equity Plan Public Comment Period

November 1, 2023 – December 2, 2023

Digital Divide Snapshot

17.5%

17.5% of Marylanders lack access to high-speed broadband at home,³⁹ and 5.7% of Marylanders do not have access to home internet at all.⁴⁰

9.3%

9.3% of Marylanders do not have access to a computer.⁴¹

69,407

Of the 210,325 unemployed individuals in Maryland, an estimated 69,407 do not have foundational digital skills.⁴²

Adult Education

Maryland's State adult education system is administered by the Adult Education and Literacy Services unit, which is part of the Maryland Department of Labor's Division of Workforce Development and Adult Learning. In 2022, the system comprised 16 community and technical colleges, four community-based organizations, two local education agencies, one library, and one correctional institution. The Adult Education and Literacy Services unit distributed \$9.2 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$8 million in state funding to these providers.⁴³

Needs and Challenges for Individuals with a Language Barrier

The Maryland Statewide Digital Equity Plan acknowledges the inequities among covered populations and recognizes that many individuals belong to multiple covered populations (p. 71).⁴⁴ For individuals with a language barrier, the plan reports that those with "significant language barriers are disproportionately unserved by broadband," and data on the other elements of digital inclusion is not yet available (p. 66). At the same time, the plan notes that, similar to other covered populations in Maryland, 96% of individuals with a language barrier can access broadband at home (pp. 19-20). The key barrier for individuals with language barriers, however, is identified as a "lack of in-language digital skills training" (p. 4).

The plan distinguishes between individuals who are English learners (individuals who speak English less than "very well") and individuals with low levels of literacy (individuals with a literacy level beneath sixth-grade level). The statewide needs assessment indicates that English learners "lag [behind] those who are fluent in English...in device adoption" (p. 66), and that "an outsized portion of English language learners only use a smartphone at home," which is related to their likelihood of only subscribing to cellular data plans (p. 96). For individuals with low levels of literacy, the plan states that it is likely that these individuals are disproportionately unserved by broadband and does not provide data on other aspects of digital inclusion (p. 66).

Plan Development

Individuals with a language barrier and the organizations serving them are present in the plan – but not consistently so. For example, when planning alignment with existing digital equity efforts, the Maryland Department of Labor and WIOA partners are listed as key partners in setting digital equity and digital literacy goals for specific covered populations (p. 10). However, the State adult education system is not included as a key partner in the alignment of educational outcomes (p. 11).

Adult education agencies are more present in stakeholder engagement efforts. For example, the Maryland Division of Workforce Development and Adult Learning, Harford Community College Adult Literacy, South Baltimore Learning Center, the Worcester County Public Schools Adult Education Program, and other adult education and workforce development providers participated in stakeholder engagement sessions on workforce development, and Strong City Baltimore Adult Learning Center participated in OBS's online survey on community anchor institutions (pp. 127-129).

A number of organizations serving individuals with a language barrier are listed in the digital inclusion asset inventory, including Strong City Baltimore Adult Learning Center, libraries (which provide digital literacy classes and internet access), the Baltimore County Career Center (which provides computer

access and introductory computer skills training), an economic development initiative from the Maryland Department of Labor (which offers a cybersecurity and IT career pathway) (p. 32-44).

OBS accepted public comments on the plan in English via email and mail. It is not stated whether adult education providers were involved in supporting adult learners in submitting public comments, but the Maryland Division of Workforce Development and Adult Learning submitted a comment.

Proposed Plan Implementation

Maryland's implementation strategies focus on closing the digital divide in general for all covered populations, with particular attention given to low-income households and digital skills (p. 117). The plan does not outline specific implementation strategies for addressing the needs of those with language barriers, including the lack of in-language digital skills training.

Aside from libraries, adult education providers are also not mentioned as implementation partners. Libraries are included as partners on multiple fronts, ranging from expanding access to broadband via the **Affordable Connectivity Program (ACP)** and low-cost plans offered by internet providers (p. 110) to offering tech support services (p. 112) to providing culturally appropriate digital skills training (pp. 113-114).

Immigrant Inclusion

Maryland is home to a growing immigrant population. Just over 15% of Maryland's population, or approximately 979,051 individuals, is foreign-born.⁴⁵ Of that population, 37.8% are termed limited English proficient (LEP).⁴⁶ Among LEP immigrant adults, 12% of households do not have access to the internet, and 24% do not have access to a computer or laptop.⁴⁷

Needs and Challenges for Immigrants

The unique needs and challenges of immigrants and refugees are absent from the plan.

Plan Development

A few immigrant serving organizations are listed as digital inclusion assets, such as the Gilchrist Immigrant Resource Center, which offers computer skills classes to immigrants, and the Prince George's County Memorial Library System, which offers multilingual library services and immigrant and refugee support (p. 40, pp. 42-43). The descriptions of these providers contain the only explicit mention of immigrants and refugees in the Maryland Statewide Digital Equity Plan.

OBS accepted public comments on the plan in English via email and mail. It is not stated whether immigrant serving organizations were involved in the public comment process.

Proposed Plan Implementation

While the plan does not include any implementation strategies to address the needs of immigrants, OBS states an intent to provide funding for libraries "to offer digital skills training, based on standardized and tested curricula that reflect cultural appropriateness" (pp. 113-114). However, the definition of "cultural appropriateness" is unclear, as this term does not appear elsewhere in the plan.

³⁹ “Examining Gaps,” 11.

⁴⁰ “Examining Gaps,” 9.

⁴¹ “Examining Gaps,” 13.

⁴² “Digital Equity Scorecard: Maryland.”

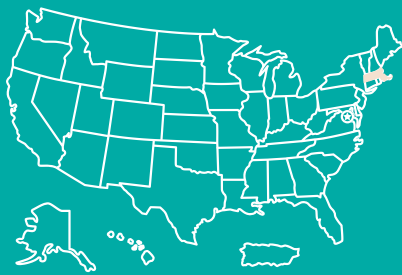
⁴³ “Maryland Table 14.”

⁴⁴ Parenthetical citations in this section refer to the Maryland Statewide Digital Equity Plan, which is included in the appendix.

⁴⁵ “Maryland - Demographics & Social.”

⁴⁶ “Maryland - Language & Education.”

⁴⁷ Hofstetter and McHugh, *Leveraging Data*.



STATE ANALYSIS: MASSACHUSETTS

Digital Equity Plan Name

Massachusetts Digital Equity Plan

Digital Equity Act Administering Entity

Massachusetts Broadband Institute (MBI), a division
of the Massachusetts Technology Collaborative

Digital Equity Plan Public Comment Period

November 13, 2023 – December 15, 2023

Digital Divide Snapshot

15.5%

15.5% of Massachusetts residents lack access to high-speed broadband at home,⁴⁸ and 5.4% of Massachusetts residents do not have access to home internet at all.⁴⁹ For those who do have internet access, the cost and reliability of service are major barriers, especially in rural regions (p. 31).⁵⁰

9.9%

9.9% of Massachusetts residents do not have access to a computer.⁵¹

66,448

Of the 201,358 unemployed individuals in Massachusetts, an estimated 66,448 do not have foundational digital skills.⁵²

Adult Education

The Massachusetts adult education system, known as Public Adult Education of Massachusetts, is overseen by the **Adult and Community Learning Services (ACLS)** unit of the Massachusetts Department of Elementary and Secondary Education. In 2022, the system comprised a network of 28 community-based organizations, 17 local education agencies, 12 community and technical colleges, eight correctional institutions, eight faith-based organizations, two four-year colleges or universities, and one other non-correctional institution. ACLS distributed \$11.2 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$40 million in state funding to these providers.⁵³

Needs and Challenges for Individuals with a Language Barrier

The Massachusetts Digital Equity Plan identifies individuals with a language barrier as one of the covered populations with the highest needs (p. 153). Among all covered populations, individuals with a language barrier were found to be least likely to have broadband access at home and less likely to be able to regularly use the internet (p. 54). They were also least likely to have a desktop computer, laptop, or tablet and more likely to have difficulty with digital skills across all areas (p. 55). These difficulties include “searching and applying for jobs online, accessing healthcare or telehealth, and participating in the local community” (p. 55).

Plan Development

Multiple adult education providers were involved in the development of the Massachusetts Digital Equity Plan. However, community colleges and workforce development programs are heavily represented despite the fact that community-based programs represent a larger share of Massachusetts’ adult education system. For example, the **Broadband and Digital Equity Working Group**, which worked with MBI to solicit community input and to inform the plan, only includes representatives from Berkshire Community College, MassBay Community College, the Tech Foundry (job training), and Action for Boston Community Development (adult education and workforce development) (pp. 170-171).

Notably, outside of community colleges and workforce development programs, the most commonly cited adult education-related assets are those outside of the State adult education system. For example, Tech Goes Home, whose digital skills courses are hosted by many adult education programs, is noted multiple times as an example of a provider that addresses broadband and device access and digital skills (p. 121, 129). Similarly, the Massachusetts public library system is cited as an asset for digital literacy (p. 122) and online privacy and cybersecurity (p. 123); while many libraries do provide adult education classes, these classes are not WIOA-funded. Only one WIOA Title II adult education provider, Mujeres Unidas Avanzando, is cited as an asset, albeit in the context of online accessibility and inclusivity (p. 123). However, beyond the text of the plan, multiple adult education programs, including community-based organizations, are included in the state’s **Digital Equity and Broadband Asset Inventory**.

To solicit community input on the development of the plan, MBI translated its digital equity survey for residents into eight languages. The survey was made available online and on paper (p. 34). MBI collaborated with the Broadband and Digital Equity Working Group’s networks to disseminate the survey and encourage completion (p. 20). MBI also conducted three focus groups for individuals with a language barrier, reaching a total of 43 participants, and interviewed community stakeholders serving

individuals with a language barrier (p. 35). It is not stated whether these engagement efforts were conducted in partnership with adult education providers.

For the public comment period, MBI translated executive summaries of the draft State Digital Equity Plan into four languages. Both the online and printable versions of the public comment form were also available in these languages, and printed public comment forms were accepted via mail. It is not stated whether or not adult education providers aside from those in the Broadband and Digital Equity Working Group were involved in spreading awareness about the public comment period and/or supporting adult learners in submitting public comments.

Proposed Plan Implementation

MBI states a general intent to collaborate with and fund partners serving individuals with a language barrier, but does not list implementation strategies specific to addressing these individuals' needs. The State adult education system is also not explicitly named as an implementation partner. The most direct mention appears in reference to meeting the needs of the broadband workforce, for which MBI aims to partner with “state and local workforce and education agencies, unions, community colleges, vocational techs, education and training providers, and community-based organizations” (p. 155), a group that overlaps largely with adult education providers.

Immigrant Inclusion

Massachusetts is home to 1.26 million immigrants – the sixth-largest immigrant population by state.⁵⁴ According to the Migration Policy Institute, immigrants make up 18% of the state's population,⁵⁵ with 44% speaking English less than “very well.”⁵⁶ Among immigrant adults with limited English proficiency, 14% of households do not have access to the internet, and 27% of households do not have access to a computer or laptop.⁵⁷

Needs and Challenges for Immigrants

Immigrants and refugees are occasionally discussed in relation to individuals with language barriers and racial and ethnic minorities. For example, MBI recognizes that “[i]mmigrants and refugees can struggle to access vital information and services due to barriers around language accessibility, internet access, and device access” (p. 53). Participants in one public listening session also noted that immigrants with limited English proficiency can struggle to use the internet because content is not in their native language, and websites may not offer translation (p. 108). In addition, MBI states that many immigrants and refugees, and people of color live in “Gateway Cities” (p. 53, p. 56), or “midsize urban centers that anchor regional economies around the state” (p. 8).

Plan Development

Multiple immigrant serving organizations, such as the Asian Business Empowerment Council and Latinos for Education, are represented on the **Broadband and Digital Equity Working Group**, which worked with MBI to solicit community input and to inform the plan (pp. 170-171). In addition, Latinos for Education assisted in planning the state's public listening sessions (pp. 173-174).

Several immigrant serving organizations are also cited as assets in the plan, particularly with regard to addressing broadband availability and affordability (e.g., the Southeast Asian Coalition of Central

Massachusetts) (p. 120) and online accessibility and inclusivity (e.g., Center for New Americans) (p. 123). Additional immigrant serving organizations are included in the state's **Digital Equity and Broadband Asset Inventory**.

To solicit community input on the development of the plan, MBI translated its digital equity survey for residents into eight languages. The survey was made available online and on paper (p. 34). MBI collaborated with the Broadband and Digital Equity Working Group's networks to disseminate the survey and encourage completion (p. 20). MBI also conducted three focus groups for individuals with a language barrier, reaching a total of 43 participants, and interviewed community stakeholders serving individuals with a language barrier (p. 35). It is not stated whether these engagement efforts were conducted in partnership with immigrant serving organizations.

For the public comment period, MBI translated executive summaries of the draft State Digital Equity Plan into four languages. Both the online and printable versions of the public comment form were also available in these languages, and printed public comment forms were accepted via mail. It is not stated whether or not immigrant serving organizations aside from those in the Broadband and Digital Equity Working Group were involved in spreading awareness about the public comment period and/or supporting adult learners in submitting public comments.

Proposed Plan Implementation

The Massachusetts Digital Equity Plan does not list implementation strategies specific to addressing immigrants' needs or name any immigrant serving organizations as implementation partners.

⁴⁸ "Examining Gaps," 11.

⁴⁹ "Examining Gaps," 9.

⁵⁰ Parenthetical citations in this section refer to the Massachusetts Digital Equity Plan, which is included in the appendix

⁵¹ "Examining Gaps," 13.

⁵² "Digital Equity Scorecard: Massachusetts."

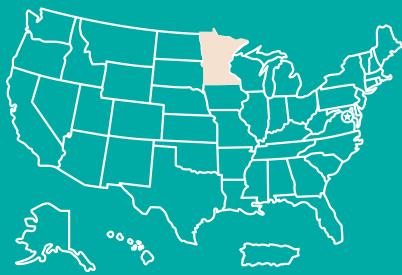
⁵³ "Massachusetts Table 14."

⁵⁴ Hofstetter and McHugh, *Leveraging Data*, 5.

⁵⁵ "Immigrant Population by State."

⁵⁶ "Massachusetts - Language & Education."

⁵⁷ Hofstetter and McHugh, *Leveraging Data*.



STATE ANALYSIS: MINNESOTA

Digital Equity Plan Name

Minnesota Digital Opportunity Plan

Digital Equity Act Administering Entity

The **Office of Broadband Development (OBD)**,
in the Minnesota Department of Employment
and Economic Development

Digital Equity Plan Public Comment Period

August 21, 2023 – September 29, 2023

Digital Divide Snapshot

20.6%

20.6% of Minnesotans lack access
to high-speed broadband at home,⁵⁸
and 5.9% of Minnesotans do not have
access to home internet at all.⁵⁹

9.1%

9.1% of Minnesotans do not have
access to a computer.⁶⁰

44,075

Of the 133,562 unemployed
individuals in Minnesota, an estimated
44,075 do not have foundational
digital skills.⁶¹

Adult Education

The State adult education system, known as **Minnesota Adult Basic Education (ABE)**, is overseen by the Minnesota Department of Education. In 2022, the system comprised a network of 31 local educational agencies, four community-based organizations, two correctional institutions, and one Tribal nation. ABE distributed \$6 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$50.2 million in state funding to these providers.⁶²

Needs and Challenges for Individuals with a Language Barrier

Minnesotans with a language barrier face distinct challenges in accessing digital opportunities. The plan makes a distinction between individuals with limited English fluency (referring to those who *speaking* English “less than very well”) and individuals with limited English literacy (referring to English *reading* level) and acknowledges that while these groups overlap, they also have their differences (pp. 65-66)⁶³. OBD considers limited English fluency and literacy to be “significant vulnerabilities” (p. 69).

While “Minnesota’s most linguistically diverse communities are often located in areas with broadband access” (p. 66), the broadband subscription rate for people with limited English fluency and/or literacy remains lower than average (p. 68). According to the plan, only 65.3% of individuals with limited English fluency have a broadband subscription (p. 92). OBD also found that individuals with limited English fluency and/or literacy were less likely to have access to a computer at home (p. 68). Lastly, adults with limited English fluency indicated a significant demand for technology classes on online safety (p. 68). In particular, parents whose unfamiliarity with technology stemmed from language barriers expressed major concerns regarding their children’s use of technology (p. 69). At the same time, children are commonly responsible for assisting their parents with technology in households where the primary language is not English (p. 69).

The plan also acknowledges that language barriers are compounded by other challenges. For example, language barriers correlate with “low levels of formal education”: 66.5% of people without high school diplomas had a broadband subscription, in comparison to 71.3% of people completing high school and 85.6% of college graduates (p. 68).

Plan Development

Multiple adult education providers hosted **Digital Connection Committees (DCCs)**, including adult education programs from Independent School Districts (ISDs) 622, 624, and 832; Literacy Minnesota; and Metro North Adult Basic Education (pp. 85-88). DCCs are self-selected, cross-sector workgroups that are responsible for sharing updates on OBD’s digital equity planning process. DCCs also have the optional responsibilities of gathering information about local digital inclusion assets, needs, and goals; participating in networking sessions with other Committees; providing feedback on the Minnesota Digital Opportunity Plan, and being part of OBD’s digital equity partner network.⁶⁴

Sixty-eight of the DCCs received non-competitive mini-grants to collect qualitative and quantitative digital inclusion data and to develop a local digital inclusion asset inventory (p. 11). The plan references multiple focus groups and surveys with individuals with language barriers and cites the DCCs that contributed to this work. In particular, the input of English learners, especially parents speaking non-English languages, clearly informs the needs and challenges described in the plan (pp. 67-69).

OBD also cites adult education as an asset in multiple ways: the Minnesota ABE system for its services for individuals with limited English fluency and/or literacy (p. 68); the Minnesota Career Education Center for its adult basic education classes, technology-enabled learning content, and assistive technology for incarcerated individuals (p. 62); and Literacy Minnesota's [Northstar Digital Literacy](#), for its leadership in digital skills assessment (p. 32).

For its public comment process, OBD accepted written comments in English via an online form and via mail. OBD also hosted 16 in-person and two virtual public listening sessions to solicit input. Some public libraries also offered paper copies of the plan for the public to read.⁶⁵ It is not stated to what extent adult education providers participated in or supported this process.

Proposed Plan Implementation

As part of its implementation goal to “connect people to people,” OBD plans to “pilot a structured Digital Opportunity Leaders Network that combines local energy, regional expertise, and statewide continuity” (p. 16). The Network would encourage participation in local DCCs and provide regional coordination and technical support for them via contracted partners, while OBD would focus on maintaining and expanding current DCCs (p. 16). Thus, there continue to be opportunities for adult education provider-led DCCs to contribute to local, regional, and statewide digital inclusion efforts.

OBD's other implementation goals are summarized as “connect people to information” (p. 17) and “connect people to resources” (p. 19), and the Office states an intent to “administer competitive grant funding to organizations serving covered populations that are conducting digital opportunity work” (p. 20). OBD will also collaborate with the Minnesota Career Education Center and the Minnesota Department of Corrections to ensure formerly incarcerated individuals have access to re-entry support services and technology (p. 20). In general, however, the plan's implementation objectives and activities focus on supporting digital inclusion for all Minnesotans, and OBD does not list any strategies specifically targeting individuals with a language barrier.

That being said, the Minnesota Digital Opportunity Plan recognizes that “[t]ranslation and plain language, while practical and necessary, are not blanket solutions on their own” (p. 66). OBD acknowledges that setting up an internet subscription and using the internet can be challenges for fluent speakers and readers of English, and thus, strategies that effectively address the needs of individuals with language barriers require “additional supports, often in the form of human connections and trust” (p. 66).

Immigrant Inclusion

Minnesota has a sizable immigrant community, with 8.7% of residents being foreign-born⁶⁶. 40.9% of Minnesotan immigrants speak English less than “very well.”⁶⁷ Among immigrant adults with limited English proficiency, 14% of households do not have access to the internet, and 27% do not have access to a computer or laptop.⁶⁸

Needs and Challenges for Immigrants

The Minnesota Digital Opportunity Plan identifies some unique needs and challenges for immigrants. For example, OBD recognizes the essential role that technology plays in helping immigrants and refugees stay connected with family, friends, and culture (p. 67). In addition, online privacy and safety

are significant concerns for immigrants with limited English fluency (p. 68). Lastly, immigrants and refugees may come from countries where technology is restricted or unavailable, so understanding connectivity and devices may be entirely new to them (p. 70).

These needs and challenges are compounded by other barriers: in Minnesota, immigrants are more likely to live below 150% of the federal poverty level than Minnesota-born residents. Thus, it can be especially challenging for immigrants to afford internet access (p. 69).

Plan Development

Many immigrant serving organizations hosted **Digital Connection Committees (DCCs)**, including the International Institute of Minnesota, Raices Latinas, the Chinese Community Center, and African Career, Education, and Resources, Inc. (pp. 85-88). DCCs are self-selected, cross-sector workgroups that are responsible for sharing updates on OBD's digital equity planning process. DCCs also have the optional responsibilities of gathering information about local digital inclusion assets, needs, and goals, participating in networking sessions with other Committees; providing feedback on the Minnesota Digital Opportunity Plan; and being part of OBD's digital equity partner network.⁶⁹

Sixty-eight of the DCCs received non-competitive mini-grants to collect qualitative and quantitative digital inclusion data and to develop a local digital inclusion asset inventory (p. 11). The plan references multiple focus groups and surveys with immigrant community members who speak languages other than English, as well as the organizations and advocates that serve them, and cites the DCCs that contributed to this work. In particular, the input of immigrant parents clearly informs the needs and challenges described for both immigrants and individuals with language barriers (pp. 67-69).

For its public comment process, OBD accepted written comments in English via an online form and via mail. OBD also hosted 16 in-person and two virtual public listening sessions to solicit input. Some public libraries also offered paper copies of the plan for the public to read.⁷⁰ It is not stated to what extent immigrant serving organizations participated in or supported this process.

Proposed Plan Implementation

As part of its implementation goal to “connect people to people,” OBD plans to “pilot a structured Digital Opportunity Leaders Network that combines local energy, regional expertise, and statewide continuity” (p. 16). The Network would encourage participation in local DCCs and provide regional coordination and technical support for them via contracted partners, while OBD would focus on maintaining and expanding current DCCs (p. 16). Thus, there continue to be opportunities for DCCs led by immigrant serving organizations to contribute to local, regional, and statewide digital inclusion efforts.

OBD also plans to collaborate with the Minnesota Office of New Americans to “support access to digital skills training and resources for immigrants and refugees” (p. 20). Beyond this mention, however, the plan's implementation strategies focus on closing the digital divide for all Minnesotans rather than any one particular group of individuals.

⁵⁸ “Examining Gaps,” 11.

⁵⁹ “Examining Gaps,” 9.

⁶⁰ “Examining Gaps,” 13.

⁶¹ “Digital Equity Scorecard: Minnesota.”

⁶² “Minnesota Table 14.”

⁶³ Parenthetical citations in this section refer to the Minnesota Digital Opportunity Plan, which is included in the appendix.

⁶⁴ “Digital Connection Committees.”

⁶⁵ “Connecting All Minnesotans.”

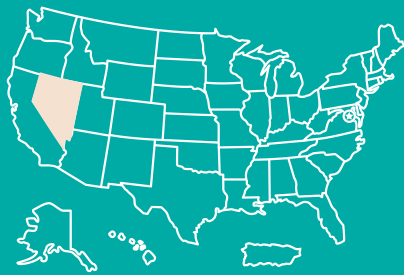
⁶⁶ “Minnesota - Demographics & Social.”

⁶⁷ “Minnesota - Language & Education.”

⁶⁸ Hofstetter and McHugh, *Leveraging Data*.

⁶⁹ “Digital Connection Committees.”

⁷⁰ “Connecting All Minnesotans.”



STATE ANALYSIS: NEVADA

Digital Equity Plan Name

Nevada Statewide Digital Equity Plan:
Closing Nevada's Digital Divide

Digital Equity Act Administering Entity

Nevada Governor's Office of Science,
Innovation and Technology (OSIT)

Digital Equity Plan Public Comment Period

September 20, 2023 – October 20, 2023

Digital Divide Snapshot

21%

21% of Nevadans lack access to
high-speed broadband at home,⁷¹
and 7.6% of Nevadans do not have
access to home internet at all.⁷²

12.9%

12.9% of Nevadans do not have
access to a computer.⁷³

42,753

Of the 129,556 unemployed
individuals in Nevada, an estimated
42,753 do not have foundational
digital skills.⁷⁴

Adult Education

Nevada's State adult education system is administered by the Nevada Department of Education's **Adult Education Office**. In 2022, the system comprised a network of four community and technical colleges, one community-based organization, one faith-based organization, and one library. The Adult Education Office distributed \$7.4 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$402,018 in state funding to these providers.⁷⁵

Needs and Challenges for Individuals with a Language Barrier

The Nevada Statewide Digital Equity Plan cites that 11.9% of Nevadans are English learners, and 25.3% are individuals with low literacy (p. 47)⁷⁶. Notably, OSIT's online survey found that respondents with limited English proficiency had the highest interest out of all covered populations in learning digital skills (p. 51): 58% expressed interest, compared to 22% of overall respondents (p. 47). Additionally, English learners were more likely to face challenges accessing online resources: 33% reported that they were "less than comfortable" searching for online information about jobs or healthcare and paying bills online, and 42% were "less than comfortable" making appointments online (p. 47). However, the plan does not elaborate on why English learners may have these challenges, nor does it provide insights on needs and challenges unique to individuals with low literacy.

Plan Development

The Nevada adult education system is briefly acknowledged in the plan. When describing programs that provide digital skills training for workforce development, OSIT recognizes Nevada's adult education system and its wide variety of digital skills training, ranging from basic computer skills classes to courses that lead to industry-recognized credentials. Specific institutions are called out for their services, such as Western Nevada College and Goodwill of Southern Nevada (p. 35). All seven Nevada adult education providers also appear in the plan's digital inclusion asset inventory as organizations serving individuals with a language barrier (pp. 21-32).

In aligning the Nevada Statewide Digital Equity Plan with the state's existing educational goals, OSIT notes an intent to provide greater learning opportunities to students of all ages and to support underserved populations in accessing higher education. The plan states that as students and youth gain access to the internet and devices, "they become 'in-house' digital navigators for parents, guardians, grandparents, and other older members of their household, which raises overall digital literacy and expands adults' opportunities to improve digital skills for higher wages" (p. 5). While this statement is not an actual implementation strategy, it does frame digital skills building opportunities for adults as merely an effect of digital skills building opportunities for K-12 students and places the burden of digital navigation on youths.

For the public comment process, OSIT accepted public comments in English via an online form and via mail. OSIT also held in-person and virtual community listening sessions⁷⁷. It is not stated to what extent adult education providers supported and/or participated in this process.

Proposed Plan Implementation

The Nevada Statewide Digital Equity Plan states an objective to "[d]evelop a strategy and partnerships to provide on-demand device technical support," including the consideration of multilingual technical

support (p. 14). Short-term, OSIT proposes leveraging digital navigators to offer multilingual technical support for devices outside of typical working and school hours (p. 14). These digital navigators will be placed in community anchor institutions in safe locations (p. 16).

OSIT also states an intent to engage more Nevadans by providing online information in more languages (p. 7). Especially important is making the State websites more accessible to English language learners (p. 8): OSIT plans to conduct an audit of State websites used by covered populations and assess their “accessibility, inclusivity, user experience, and ease of access” (p. 17).

Beyond these objectives and activities, the plan’s implementation strategies focus on closing the digital divide for all Nevadans.

Immigrant Inclusion

Home to 600,957 immigrants (who make up 18.9% of the state’s population),⁷⁸ Nevada ranks 16th highest among U.S. states with the most immigrants.⁷⁹ 46.1% of Nevadan immigrants speak English less than “very well.”⁸⁰ Among immigrant adults with limited English proficiency, 21% of households do not have access to the internet, and 33% of households do not have access to a computer or laptop.⁸¹

Needs and Challenges for Immigrants

OSIT’s covered population needs assessment, which was available in English and Spanish (p. 39), identified immigrants as a population with a “much greater interest in learning digital skills” (p. 51). The plan also recognizes that individuals with limited English proficiency and immigrants are distinct groups (p. 51). Beyond these brief references, immigrants and refugees are not discussed in the plan.

Plan Development

In alignment with its goal of improving the accessibility and inclusivity of essential services on government websites, the Nevada Statewide Digital Equity Plan calls out the Governor’s Office for New Americans (ONA)’s work to make “state government website (*sic*) more inclusive so they are more accessible to English language learners” (p. 8). The ONA is also listed as a stakeholder, although it is not stated to what extent the ONA contributed to the development of the plan (p. 73).

In addition, the plan’s digital inclusion asset inventory cites at least two immigrant serving organizations, including the ONA and Catholic Charities of Southern Nevada (pp. 21-32).

For the public comment process, OSIT accepted public comments in English via an online form and via mail. OSIT also held in-person and virtual community listening sessions.⁸² It is not stated to what extent immigrant serving organizations supported and/or participated in this process.

Proposed Plan Implementation

The plan does not include any implementation strategies addressing the specific needs of immigrants beyond those outlined for serving individuals with a language barrier.

⁷¹ “Examining Gaps,” 11.

⁷² “Examining Gaps,” 9.

⁷³ “Examining Gaps,” 13.

⁷⁴ “Digital Equity Scorecard: Nevada.”

⁷⁵ “Nevada Table 14.”

⁷⁶ Parenthetical citations in this section refer to the Nevada Statewide Digital Equity Plan, which is included in the appendix.

⁷⁷ Young, “Nevada Statewide Digital Equity Plan.”

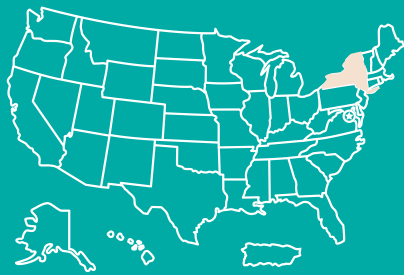
⁷⁸ “Nevada - Demographics & Social.”

⁷⁹ “Immigrant Population by State.”

⁸⁰ “Nevada - Language & Education.”

⁸¹ Hofstetter and McHugh, *Leveraging Data*.

⁸² Young, “Nevada Statewide Digital Equity Plan.”



STATE ANALYSIS: NEW YORK

Digital Equity Plan Name

New York State Digital Equity Plan

Digital Equity Act Administering Entity

New York State's **ConnectALL Office (CAO)**

Digital Equity Plan Public Comment Period

November 6, 2023 – December 6, 2023

Digital Divide Snapshot

21.1%

21.1% of New Yorkers lack access to high-speed broadband at home,⁸³ and 7.8% of New Yorkers do not have access to home internet at all.⁸⁴

12.2%

12.2% of New Yorkers do not have access to a computer.⁸⁵

224,985

Of the 681,773 unemployed individuals in New York, an estimated 224,985 do not have foundational digital skills.⁸⁶

Adult Education

The New York adult education system is overseen by the **Adult Education Programs and Policy (AEPP) Office** in the New York State Education Department. In 2022, the network comprised 79 local educational agencies, 22 community-based organizations, eight community and technical colleges, five faith-based organizations, three libraries, and three four-year colleges and universities.⁸⁷ Many adult education providers are **Boards of Cooperative Educational Services (BOCES)**, or public organizations that provide shared educational programs and services to school districts within the state.⁸⁸ AEPP distributed \$46 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$66.8 million in state funding to these providers in 2022.⁸⁹

Needs and Challenges for Individuals with a Language Barrier

According to the New York State Digital Equity Plan, 26% of New York residents are individuals with language barriers, which the state defines as “individuals who have difficulty communicating in English or individuals with low English language literacy” (p. 63).⁹⁰ New Yorkers with language barriers are more likely to face barriers to digital inclusion than other New Yorkers. For example, they are:

- “12% less likely to have broadband internet access at home” (p. 63);
- “12% more likely to say that paying for internet is very difficult” (p. 63);
- “14% more likely to use internet subsidies” (p. 64);
- “7% less likely than others to access the internet through a laptop” (p. 64); and
- “7-25% less likely to feel ‘completely confident’ in their [digital literacy skills]” (p. 64).

For those who do have home internet access, sharing the internet and devices with family members can be yet another challenge (p. 63). In addition, those with language barriers reported concerns about virtual scams and difficulties navigating government websites. Government websites pose multiple layers of challenges, including being difficult to navigate, using inaccessible language (jargon), and not consistently offering accurate, functional translation into non-English languages (p. 64). An included quote from a focus group participant emphasizes that language barriers exist “for non-English speakers AND for those that are not tech savvy” – technological jargon compounds these challenges (p. 64).

Overall, 28% of individuals with a language barrier “struggle to use the internet to meet their needs,” in comparison to 13% of the state’s population (p. 102). They also need help accessing existing digital literacy training in the state (p. 101). Lastly, CAO recognizes the intersectionality between covered populations, with 5% of New York’s population identifying as both individuals with language barriers and members of a racial or ethnic minority (p. 55).

Plan Development

The New York State Digital Equity Plan recognizes the role of adult education providers in bridging the digital divide. CAO cites adult education providers and partners as digital inclusion assets throughout the plan, including BOCES (p. 36), libraries (p. 36), and specific organizations like Literacy Partners (p. 103). Notably, these providers are noted not only for their role in providing digital literacy services (p. 103) but also for their role in expanding broadband and device access for their constituents (pp. 36-37).

To develop the plan, CAO partnered with the New York State Library (NYSL) to co-convene an

interagency Digital Equity Working Group, which later became the formal Digital Equity Task Force. The Digital Equity Task Force, now comprising State agencies, community institutions, private partners, and covered populations, developed objectives, outcomes, and partnerships around different digital equity outcome areas. The Task Force also convened stakeholders and community members to solicit input to inform the plan's needs assessment and objectives (p. 113). The New York State Education Department was part of the Task Force's steering and education committees, and the Franklin-Essex-Hamilton BOCES was part of the education committee (p. 115).

To collect information on the needs and barriers of New York residents, the CAO joined forces with regional Digital Equity Coalitions (DECs) to distribute their Internet Access Survey. Each coalition also developed its own outreach plan to ensure their communities would be effectively reached (pp. 116-117). While 10% of survey respondents identified as individuals with language barriers (p. 145), the plan notes the limitations in engaging this population: "although both digital and paper versions of the survey were made available, most announcements about the survey were made in digital or physical print, and it was not possible to complete the survey orally unless the respondent knew to use the text reading functionality made available in the online version of the survey" (p. 146). The survey also did not differentiate between respondents with limited English speaking proficiency and limited English literacy (p. 148).

Regional Digital Equity Coalitions also supported CAO's other stakeholder engagement efforts (including focus groups and listening sessions) through a participatory planning process that centers the experience and expertise of covered populations (p. 119). In total, these regional coalitions conducted 47 focus groups, engaging 721 individuals representing all covered populations (p. 121). Five focus groups with individuals with language barriers provided additional information to supplement the limited responses to the Internet Access Survey (p. 146, p. 153).

For the public comment process, the New York State Digital Equity Plan and appendices were available in English and Spanish.⁹¹ CAO accepted comments in English and Spanish via an online form and held two virtual forums to provide updates on the plan.⁹² The plan also states an intent to host town halls and regional listening sessions to solicit comments, although these are not confirmed. It is not stated if or to what extent adult education providers supported this process.

Proposed Plan Implementation

The CAO intends to "invest at least \$50 million in the digital equity grants program" to support the plan's implementation (p. 18). Individuals with language barriers are highlighted in multiple core implementation strategies, including tailored digital literacy training at public computing centers (p. 24), raising awareness of existing digital literacy programs (p. 30), increasing online privacy and cybersecurity training (p. 31), increasing broadband access and related outreach efforts in target languages (pp. 125-126), and increasing access to internet-enabled devices (p. 129).

In particular, CAO plans to fund existing digital literacy efforts that serve those with language barriers (p. 134), coordinate statewide directories of digital inclusion programs for users (p. 129, 133), and improve multilingual marketing efforts and community partnerships (p. 133). Notably, to ensure covered populations have increased access to digital literacy training, CAO plans to "provide financial incentives and support during training for underserved and underrepresented populations to...

address barriers to training program participation like financial insecurity that hinder recruitment” (p. 134). Additionally, CAO proposes to offer wraparound services, including childcare, transportation assistance, access to devices, and stable internet access (p. 134).

While not specific to organizations serving those with language barriers, digital literacy providers have raised concerns about the lack of consistent curricula and standards that align with industry standards and how this challenge poses a barrier to scaling up their work. As a result, CAO plans to facilitate collaboration among providers “to achieve consistent and industry-aligned training standards for skills programs across the state,” particularly for the workforce (p. 31). To support this work, the plan calls out adult education providers for the critical role they play in teaching digital literacy and proposes robust education and training for educators (p. 135).

Lastly, recognizing the diversity of expertise the Digital Equity Task Force brought to the planning process, CAO also plans to expand the role of the Task Force to include implementation, policy development, and performance measurement (p. 27).

Immigrant Inclusion

In New York, a state with a rich immigration history, 4.46 million residents (22.7% of the population) are foreign-born, making it the state with the fourth largest immigrant population.⁹³ Among this population, 45.1% report speaking English less than “very well.”⁹⁴ Among immigrant adults with limited English proficiency, 16% of households do not have internet access, and 28% of households do not have access to a computer or laptop.⁹⁵

Needs and Challenges for Immigrants

The New York State Digital Equity Plan includes qualitative data on the unique needs and barriers that immigrants and refugees face (p. 73). CAO acknowledges that the diversity of New York’s immigrant and refugee population, which spans dozens of countries and over 40 languages, is often overlooked (p. 74).

Immigrants and refugees face significant barriers in terms of affordability, which affects their internet and device access. This barrier is not easy to address, as “many immigrants and refugees cannot access mainstream employment due to a lack of documentation, and some earners are financially committed to support extended family both in the U.S. and in their country of origin” (p. 73). Immigrants and refugees who do have an internet plan often subscribe to the lowest-cost plan, which does not provide sufficient service (p. 73). Also, while some programs do provide internet-enabled devices to immigrants and refugees, the quality of the devices is usually poor (pp. 73-74).

The plan also recognizes that immigrants and refugees are especially concerned about online surveillance “due to experiences with conflict, government violence, and/or persecution, or due to a lack of legal citizenship documentation” (p. 74). They are also disproportionately vulnerable to scams, which exploit their lack of familiarity with U.S. public resources or their fear of making mistakes that could lead to deportation (p. 74). Thus, some immigrants and refugees may avoid using online services and tools entirely (p. 53).

Plan Development

In aligning its efforts with existing state efforts, the CAO recognizes the New York State Office for New Americans (ONA) for its civic and economic engagement and digital equity work in immigrant

and refugee communities (p. 23). The ONA implements many initiatives to which internet access is critical, including the state's Cell-Ed partnership: Cell-Ed provides a wide range of mobile learning opportunities, including civics courses for immigrants applying for U.S. naturalization (p. 23).

The ONA was also part of the Digital Equity Task Force's committee on civic and social engagement (p. 116). The Task Force was responsible for developing objectives, outcomes, and partnerships around different digital equity outcome areas and convening stakeholders and community members to solicit input to inform the plan's needs assessment and objectives (p. 113).

Immigrants and refugees in focus groups also helped contribute to the description of immigrant needs and challenges (p. 53), although it is not stated how many focus groups included members of this community.

For the public comment process, the New York State Digital Equity Plan and appendices were available in English and Spanish.⁹⁶ CAO accepted comments in English and Spanish via an online form and held two virtual forums to provide updates on the plan.⁹⁷ The plan also states an intent to host town halls and regional listening sessions to solicit comments, although these are not confirmed. It is not stated if or to what extent immigrant serving organizations supported this process.

Proposed Plan Implementation

While there are mentions of relevant activities like implementing "peer-led digital literacy training programs, where individuals...from diverse backgrounds can educate and support others" and developing "culturally tailored digital health resources" (p. 22), the plan's implementation strategies do not target immigrants and refugees specifically. However, recognizing the diversity of expertise the Digital Equity Task Force brought to the planning process, CAO does plan to expand the role of the Task Force to include implementation, policy development, and performance measurement (p. 27).

⁸³ "Examining Gaps," 12.

⁸⁴ "Examining Gaps," 10.

⁸⁵ "Examining Gaps," 14.

⁸⁶ "Digital Equity Scorecard: New York."

⁸⁷ "New York Table 14."

⁸⁸ "WIOA Title II Funding."

⁸⁹ "New York Table 14."

⁹⁰ Parenthetical citations in this section refer to the New York State Digital Equity Plan, which is included in the appendix.

⁹¹ "New York State Digital Equity Plan."

⁹² "ConnectALL Events."

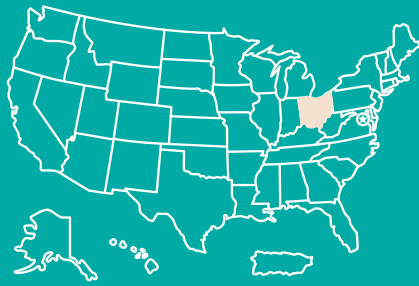
⁹³ "Immigrant Population by State."

⁹⁴ "New York - Language & Education."

⁹⁵ Hofstetter and McHugh, *Leveraging Data*.

⁹⁶ "New York State Digital Equity Plan."

⁹⁷ "ConnectALL Events."



STATE ANALYSIS: OHIO

Digital Equity Plan Name

Ohio Digital Opportunity Plan

Digital Equity Act Administering Entity

BroadbandOhio, in the Ohio Department
of Development

Digital Equity Plan Public Comment Period

August 22, 2023 – September 22, 2023

Digital Divide Snapshot

23%

23% of Ohioans lack access to high-speed broadband at home,⁹⁸ and 8.4% of Ohioans do not have access to home internet at all.⁹⁹

32%

In Appalachian Ohio, 32% of households do not have access to the **minimum broadband speed** set by the Federal Communications Commission, and 75% of the region is unserved.¹⁰⁰

13.4%

13.4% of Ohioans do not have access to a computer.¹⁰¹

116,912

Of the 354,278 unemployed individuals in Ohio, an estimated 116,912 do not have foundational digital skills.¹⁰²

Adult Education

The State adult education system in Ohio is overseen by the Ohio Department of Higher Education, and providers are known as **Aspire programs**. In 2022, the network comprised 35 local educational agencies, eight community and technical colleges, five community-based organizations, two four-year colleges and universities, one library, and one other non-correctional institution. The Department of Higher Education distributed \$16.3 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$7.1 million in state funding to these providers.¹⁰³

Needs and Challenges for Individuals with a Language Barrier

In assessing the needs and gaps for the state's covered populations, BroadbandOhio refers to all individuals with a language barrier as "English language learners" (p. 26)¹⁰⁴. Confusingly, the plan further notes that "many English language learners have limited English language proficiency" (p. 26), and neither defines *English language learners* nor indicates how English language learners differ from individuals with limited English proficiency.

Despite this language, BroadbandOhio recognizes that English language learners do face specific barriers. For example, they may "feel uncomfortable going to places for support that don't speak their language" (p. 26). With the physical closure of many community resources during and after the COVID-19 pandemic, English language learners have nowhere else to go when they need support. The plan acknowledges a demand for multilingual social workers and service providers to meaningfully support this population (p. 26).

In comparison to 66% of all respondents to BroadbandOhio's Internet Access Survey, only 48% of English language learners reported having sufficient device access. English language learners were also found to be the least confident about "adjusting privacy settings on social media and accessing government services" (p. 26).

Plan Development

The Ohio Department of Higher Education is a member of the Broadband Working Group, a convening of Ohio State agencies working collaboratively on broadband-related efforts (p. 4). In aligning the Ohio Digital Opportunity Plan with other state plans, BroadbandOhio also briefly mentions WIOA funding as a resource to build the state's broadband workforce (p. 5), and recognizes the collaborative work of several state agencies to provide job training, credentials, and employment opportunities for incarcerated adults (p. 6).

BroadbandOhio also established a Regional Digital Inclusion Alliance (RDIA) for each of the state's five regions. One organization was awarded funding to lead each RDIA, and the lead organization was supported by a steering committee of representatives who have experience serving covered populations. RDIAs helped BroadbandOhio with community outreach and engagement efforts to inform the plan. It is not stated if any adult education providers joined their respective RDIAs. However, some providers, such as the Cuyahoga County Public Library, are included in the digital inclusion asset inventory (Appendix 7.1.2).

Lastly, to further inform the development of the plan, BroadbandOhio awarded funding to nine community-based programs serving covered populations, including individuals with language barriers, through the Digital Inclusion Pilot Project Grant Program. Grantees utilized the funding to pilot

innovative, scalable solutions to close the digital divide. At least one grantee, the Spanish American Committee, provides digital inclusion services to individuals and families with language barriers (specifically the Latino community) (pp. 32-33).

For the public comment period, BroadbandOhio received public comments in English via email. It is not stated if adult education providers were involved in spreading awareness about the public comment period and/or supporting adult learners in submitting public comments.

Proposed Plan Implementation

The plan states a general intent to expand on the innovative models that emerged from the Digital Inclusion Pilot Project Grant Program and further support statewide grant opportunities for organizations providing digital inclusion services (pp. 32-36). Implementation strategies for serving specific covered populations, as well as measures and metrics for success, are noticeably absent.

Immigrant Inclusion

Ohio is home to about 586,000 immigrants, who make up 5% of the state's population.¹⁰⁵ Ohio ranks 17th among the states with the highest number of immigrants.¹⁰⁶ 36% of the state's immigrant population speaks English less than "very well."¹⁰⁷ Among immigrant adults with limited English proficiency, 14% do not have access to the internet, and 28% do not have access to a computer or laptop.¹⁰⁸

Needs and Challenges for Immigrants

The Ohio Digital Opportunity Plan recognizes that the state's English language learner population includes New Americans. New Americans tend to live in and around Ohio's larger urban centers and often face language barriers when it comes to digital access and adoption (p. 26).

Plan Development

During the state planning process, BroadbandOhio established a Regional Digital Inclusion Alliance (RDIA) for each of the state's five regions. One organization was awarded funding to lead each RDIA, and the lead organization was supported by a steering committee of representatives who have experience serving covered populations. RDIAs helped BroadbandOhio with community outreach and engagement efforts to inform the plan. It is not stated if any immigrant serving organizations joined their respective RDIAs. However, some immigrant service providers, such as The Centers' El Barrio Centers for Workforce Development and Catholic Charities Diocese of Cleveland, are included in the digital inclusion asset inventory (Appendix 7.1.2).

To further inform the development of the plan, BroadbandOhio also awarded funding to nine community-based programs serving covered populations, including individuals with language barriers, through the Digital Inclusion Pilot Project Grant Program. Grantees utilized the funding to pilot innovative, scalable solutions to close the digital divide. At least one grantee, the Spanish American Committee, provides digital inclusion services to immigrants (specifically the Latino community) (pp. 32-33).

For the public comment period, BroadbandOhio received public comments in English via email. It is not stated if immigrant serving organizations were involved in spreading awareness about the public comment period and/or supporting immigrants in submitting public comments.

Proposed Plan Implementation

While the plan states a general intent to expand on the innovative models that emerged from the Digital Inclusion Pilot Project Grant Program and further support statewide grant opportunities for organizations providing digital inclusion services (pp. 32-36), implementation strategies for serving immigrants are not included.

⁹⁸ “Examining Gaps,” 12.

⁹⁹ “Examining Gaps,” 10.

¹⁰⁰ Home - Connecting Appalachia.”

¹⁰¹ “Examining Gaps,” 14.

¹⁰² “Digital Equity Scorecard: Ohio.”

¹⁰³ “Ohio Table 14.”

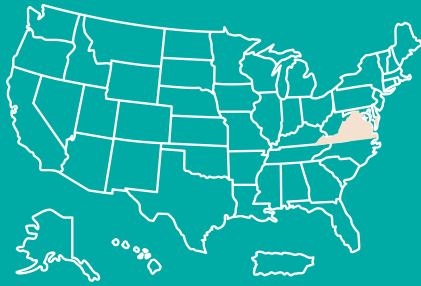
¹⁰⁴ Parenthetical citations in this section refer to the Ohio Digital Opportunity Plan, which is included in the appendix.

¹⁰⁵ “Ohio - Demographics & Social.”

¹⁰⁶ “Immigrant Population by State.”

¹⁰⁷ “Ohio - Language & Education.”

¹⁰⁸ Hofstetter and McHugh, *Leveraging Data*.



STATE ANALYSIS: VIRGINIA

Digital Equity Plan Name

Virginia Digital Opportunity Plan

Digital Equity Act Administering Entity

Virginia Office of Broadband, in the Department of Housing and Community Development (DHCD)

Digital Equity Plan Public Comment Period

November 29, 2023 – December 29, 2023

Digital Divide Snapshot

22.9%

22.9% of Virginians lack access to high-speed broadband at home,¹⁰⁹ and 7.4% of Virginians do not have access to home internet at all.¹¹⁰ Of those without internet access, 45% state that service is not available in their area (p. 22)¹¹¹.

11.3%

11.3% of Virginians do not have access to a computer.¹¹²

63,543

Of the 192,555 unemployed individuals in Virginia, an estimated 63,543 do not have foundational digital skills.¹¹³

Adult Education

The Virginia adult education system is overseen by the Virginia Department of Education (VDOE)'s **Office of Career, Technical, and Adult Education**. In 2022, the network comprised 15 local educational agencies and six community and technical colleges, which are organized into 22 regions. VDOE also supports a number of local programs outside of the regional programs.¹¹⁴ VDOE distributed \$12.9 million in Workforce Innovation and Opportunity Act (WIOA) Title II funding and \$3.3 million in state funding to these providers.¹¹⁵

Needs and Challenges for Individuals with a Language Barrier

In Virginia, 1.5 million people, or 17.8% of the population, are individuals with a language barrier (p. 32)¹¹⁶. The Virginia Digital Opportunity Plan recognizes that individuals with a language barrier comprise both English learners and individuals with low levels of literacy, and provides examples of individuals belonging to each group for clarity. The plan thus examines individuals with a language barrier through three distinct lenses: residents with low English comprehension, residents with low literacy, and residents with a combination of both (p. 61).

Across the board, DHCD highlights the following areas as the biggest needs for those with language barriers:

- “Funding – broadband and digital skill-building grants are not prioritized in language- learning grants”;
- “Affordability – device and broadband costs is a barrier to digital opportunity for many individuals who have limited literacy,” and translation services for programs and software can pose an additional cost for English learners; and
- “Skill development – self-efficacy and confidence drive skill-building,” with individuals with a language barrier more likely to struggle with basic digital skills compared to their peers without language barriers (p. 60).

At the same time, DHCD states that language constraints, not the lack of knowledge or skill on how to navigate websites and devices, are the primary barrier. For example, individuals with low levels of literacy “may be able to intuitively operate basic technologies but lack the ability to take advantage of online resources, such as telehealth tools or job sites” (p. 61). In contrast, individuals who have both low English comprehension and low literacy “experience challenges both navigating technology and in furthering their language skills” (p. 62). Even when translation is available on a specific platform, the number of languages supported may be limited, and automatic translation features often do not fully translate all the features on the website (p. 64). In addition, individuals with a language barrier may be unaware of existing digital inclusion programs because advertising is not in their native language (p. 64).

With over 81% of Virginia’s population belonging to at least one covered population category, the plan recognizes the importance of understanding the impact of intersectionality (p. 32). For example, DHCD identifies where individuals with a language barrier are clustered: many of the state’s rural regions are home to higher numbers of residents with low literacy, whereas English learners tend to live in major population centers that are home to more racial and ethnic minorities (p. 62).

Lastly, DHCD notes the multigenerational impact of language barriers on digital access: when school-age English learners do not have technology or internet access at home, and when language support

is limited, many teachers cannot use digital learning resources to support these students' learning outside of the classroom (p. 63).

Plan Development

To solicit input on the development of the plan, DHCD employed a number of community engagement strategies, including stakeholder interviews, community input sessions, focus groups on broadband access (p. 80), and the Virginia Digital Opportunity Survey for residents (p. 3). Of note:

- The stakeholder interviews were conducted one-on-one with a wide range of organizations serving covered populations. Among the stakeholders interviewed was **Literacy for Life**, an adult literacy nonprofit, which “highlighted the need for sustainable funding sources to support language learners and their digital literacy instruction” (p. 81).
- The Virginia Digital Opportunity Survey was available online and on paper, as well as its marketing materials. DHCD released the survey in the top five most commonly spoken languages in the state (p. 21). Despite these efforts, only 1% of survey respondents were individuals with a language barrier.¹¹⁷

DHCD also administered multiple subgrants during the planning process. The Regional Digital Opportunity Plan Program, which provided subgrants to eight Community Action Agencies across nine regions to research and develop Regional Digital Opportunity Plans, and included recommendations to the state on how to address region-specific needs and challenges (p. 22). DHCD also implemented the Digital Opportunity Case Study Pilot Program in order to identify innovations that organizations have been utilizing to close the digital divide in the state. Literacy for Life was one of the five organizations selected for the Case Study Pilot Program and provided data on digital literacy programming and skills for individuals with a language barrier (pp. 29-30).

For the public comment process, DHCD received public comments in English via email and hosted multiple virtual public input sessions.¹¹⁸ It is not stated to what extent adult education providers supported this process, but Literacy for Life and its partners submitted a comment to support the inclusion of individuals with a language barrier and the adult education field.

Proposed Plan Implementation

The Virginia Digital Opportunity Plan identifies some key design considerations for digital inclusion programming for individuals with a language barrier:

- Multilingual broadband programming, from advertising campaigns to curriculum to enrollment materials;
- Leveraging existing community partners and networks who already work closely with the population; and
- Streamlining broadband enrollment requirements and simplifying broadband jargon (p. 61).

However, while DHCD recognizes that tailored solutions are needed for specific covered populations, individuals with a language barrier are not included as one of these groups. That being said, DHCD states an intent to continue the work started by the organizations participating in the Regional Digital Opportunity Plan Program and the Digital Opportunity Case Study Pilot Program through the

creation of a Digital Opportunity Capacity Subgrant Program. This new grant opportunity will support organizations of all types serving all covered populations (p. 86).

Immigrant Inclusion

With over 1,105,000 immigrants (making up 12.7% of the state's population),¹¹⁹ Virginia has the tenth largest immigrant population in the U.S.¹²⁰ 38.2% of Virginian immigrants speak English less than “very well.”¹²¹ Among immigrant adults with limited English proficiency, 10% of households do not have access to the internet, and 22% of households do not have access to a computer or laptop.¹²²

Needs and Challenges for Immigrants

The Virginia Digital Opportunity Plan acknowledges some barriers unique to immigrants. For example, immigration status affects internet use: “foreign-born, non-citizens [are] 10% less likely to use the internet than their U.S.-born peers” (p. 63). Refugees are included more frequently, with the DHCD reviewing the state's *Improving Participation of Refugees in Virginia's Workforce* report from 2021 (p. 18) and recognizing that refugees are more likely to experience cyber vulnerability due to a lack of awareness about cybersecurity measures (p. 64). In addition, the plan notes that refugees may be using the internet to stay in touch with family and friends in areas with limited online privacy and protection. For refugees with limited English proficiency, these challenges compound language barriers that already make the population vulnerable to scams (p. 64).

Plan Development

Notably, almost all of the assets identified for individuals with a language barrier focus on serving refugees and immigrants, including the International Rescue Committee, Catholic Charities of Roanoke, and the U.S. Committee for Refugees and Immigrants, and Cville Tulips (which serves refugee women and children) (p. 14).

To solicit input on the development of the plan, the Virginia Digital Opportunity Survey was made available online and on paper, as well as its marketing materials. DHCD released a survey in the top five most commonly spoken languages in the state (p. 21).

DHCD also administered multiple subgrants during the planning process. The Regional Digital Opportunity Plan Program which provided subgrants to eight Community Action Agencies across nine regions to research and develop Regional Digital Opportunity Plans and included recommendations to the state on how to address region-specific needs and challenges (p. 22). DHCD also implemented the Digital Opportunity Case Study Pilot Program in order to identify innovations that organizations have been utilizing to close the digital divide in the state (p. 29). While it is not stated to what extent immigrant serving organizations were involved in the development of Regional Digital Opportunity Plans, two Case Study Pilot Program grantees specifically serve immigrants and refugees: Literacy for Life and Edu-Futuro (pp. 29-30).

For the public comment process, DHCD received public comments in English via email and hosted multiple virtual public input sessions.¹²³ It is not stated to what extent adult education providers supported this process, but Literacy for Life and its partners submitted a comment to support the inclusion of immigrants and refugees in the plan.

Proposed Plan Implementation

While DHCD recognizes that tailored solutions are needed for specific covered populations, immigrants and refugees are not included as one of these groups. That being said, DHCD states an intent to continue the work started by the organizations participating in the Regional Digital Opportunity Plan Program and the Digital Opportunity Case Study Pilot Program through the creation of a Digital Opportunity Capacity Subgrant Program. This new grant opportunity will support organizations of all types serving all covered populations (p. 86).

¹⁰⁹ “Examining Gaps,” 12.

¹¹⁰ “Examining Gaps,” 10.

¹¹¹ Parenthetical citations in this section refer to the Virginia Digital Opportunity Plan, which is included in the appendix.

¹¹² “Examining Gaps,” 14.

¹¹³ “Digital Equity Scorecard: Virginia.”

¹¹⁴ “Adult Education Regional Programs.”

¹¹⁵ “Virginia Table 14.”

¹¹⁶ *Digital Opportunity Plan Survey Results*, 4.

¹¹⁷ “Digital Opportunity Plan Input Sessions.”

¹¹⁸ “Virginia - Demographics & Social.”

¹¹⁹ “Immigrant Population by State.”

¹²⁰ “Virginia - Language & Education.”

¹²¹ Hofstetter and McHugh, *Leveraging Data*.

¹²² “Digital Opportunity Plan Input Sessions.”

COMPARING STATE DIGITAL EQUITY PLANS

This section explores three aspects across the 10 State Digital Equity Plans reviewed:

1. Key similarities and differences
2. Notable innovations and best practices
3. Other common themes and observations

Among the profiled states, there is considerable variability in 1) their definitions and descriptions of individuals with a language barrier, 2) the methodologies they employed to solicit input on their plans, and 3) the implementation strategies that they proposed.

Defining and Describing Individuals with a Language Barrier

The Digital Equity Act defines individuals with a language barrier as *individuals who are English learners [or] have low levels of literacy*. While some states do not make a distinction between these two subgroups or interpret individuals with a language barrier to mean only English learners, most states (Colorado, Georgia, Maryland, Minnesota, Nevada, New York, and Virginia) recognize the overlapping but different needs and challenges between those with limited English proficiency and those with low levels of literacy. Virginia, in particular, provides practical examples of individuals belonging to each subgroup. These examples help ground the distinctions between levels of literacy defined by the [Programme for the International Assessment of Adult Competencies \(PIAAC\)](#), which assesses and analyzes adult skills.

Eight states (Colorado, Hawai'i, Massachusetts, Minnesota, Nevada, New York, Ohio, and Virginia) include at least mentions of immigrants and refugees in their plans, usually in reference to individuals with a language barrier.

Recognizing both the needs and challenges unique to the immigrant population and the high number of immigrants in the state, Colorado establishes immigrants as an additional covered population, and the Hawai'i Digital Equity Plan recognizes immigrants as a “unique subset of ethnic minorities,” acknowledging the impact of immigrants and migrant workers on the state’s culture, economy, and history.

Most states presented data highlighting that English learners in particular, were more likely to 1) lack internet access at home due to availability and affordability challenges and 2) struggle with digital skills.

A few states discussed some of the social implications of these digital inequities. Virginia, for example, noted the multigenerational impact that stems from a lack of computer and internet access at home. Colorado recognized that a digital connection to families back home is critical to supporting immigrants’ mental health. In addition, some states noted that online privacy and safety were significant concerns for immigrants with limited English proficiency.

Soliciting Input on State Digital Equity Plans

All ten states engaged stakeholders representing individuals with a language barrier as required but to differing degrees. States also differed significantly in how they engaged individuals with a language barrier directly to solicit input.

Five states (Colorado, Massachusetts, Nevada, New York, and Virginia) provided translations of their public surveys in at least one language, while the others accepted responses only in English. Notably,

Colorado recruited and funded 23 community-based organizations to help support residents in completing their Statewide Digital Equity Survey. The survey was also available in 22 languages, online and on paper, and the state collaborated with Comcast to air a public service announcement in Spanish to promote the survey. These collective efforts resulted in a significant response from individuals with a language barrier, with 18% of online respondents and 22% of paper respondents identifying as members of this population.

Four states (Hawai'i, Massachusetts, Minnesota, and New York) conducted focus groups with individuals with a language barrier. Hawai'i conducted sixteen focus groups; Massachusetts, three; and New York, five; Minnesota did not state how many focus groups were conducted.

Four states (Colorado, Minnesota, Ohio, and Virginia) established grant programs to support regional and local community engagement and data collection efforts. The community-based organizations recruited by Colorado also hosted listening sessions for their communities. In Minnesota, sixty-eight Digital Connection Committees (cross-sector workgroups) received non-competitive mini-grants to collect digital inclusion data and to develop a local digital inclusion asset inventory. Ohio established five Regional Digital Inclusion Alliances, one for each region of the state, to support community outreach and engagement efforts. Lastly, in Virginia, the Regional Digital Opportunity Plan Program provided subgrants to eight Community Action Agencies across the state's nine regions to research and develop Regional Digital Opportunity Plans, which included recommendations to the state on how to address region-specific needs and challenges. While New York also partnered with regional Digital Equity Coalitions on community engagement and data collection, it is not stated if they received funding for these activities.

Two states (Ohio and Virginia) established grant programs to identify innovative solutions to close the digital divide for covered populations. Ohio awarded funding to nine community-based programs through the Digital Inclusion Pilot Project Grant Program, and Virginia awarded funding to five organizations through the Digital Opportunity Case Study Pilot Program. In both states, at least one organization serving individuals with a language barrier received an award.

Four out of the seven states with **Offices of New Americans** (Colorado, Minnesota, Nevada, and New York) called out their Office, either as a collaborator on the plan, an implementation partner, or a digital inclusion asset. Similarly, Hawai'i intends to partner with its Office of Language Access.

All states were required to post the draft of their Digital Equity Plans for public comment for at least 30 days. Three states (Colorado, Massachusetts, and New York) both released versions of their plan and accepted public comments in other languages. Colorado provided summaries of its plan in nine languages and accepted comments in ten; Massachusetts provided summaries and accepted comments in five languages. Six states (Colorado, Georgia, Minnesota, Nevada, New York, and Virginia) held at least one public comment session, whether in-person or virtual. Five states (Hawai'i, Maryland, Massachusetts, Minnesota, and Nevada) accepted public comments via mail.

Proposed Implementation Strategies

The State Digital Equity Plans vary widely in their proposed implementation strategies, the specificity of these strategies, and which types of organizations they named as prospective implementation partners.

While all ten states recognize adult education providers and immigrant serving organizations as digital inclusion assets serving individuals with a language barrier, many do not articulate a clear role for them

in their plans for implementation. Instead, states plan to draw on their community college, workforce development, and public library systems to advance their digital skills work (and digital equity in general). State adult education offices and systems are typically not named as implementation partners. Colorado's, Minnesota's, and Virginia's plans stand out in their inclusion of adult education providers.

Several states propose building on the structures they put in place and the insights and innovations they identified in the planning phase. For example, Ohio plans to expand on the innovative digital inclusion models that emerged from its Digital Inclusion Pilot Project Grant Program, and Minnesota plans to continue supporting and growing its Digital Connection Committees.

Notably, six states (Colorado, Massachusetts, Minnesota, New York, Ohio, and Virginia) plan to (or will continue to) rely on regional collaborative efforts to support a statewide digital equity ecosystem and promote digital inclusion programming. States refer to these collaborative efforts differently (digital equity coalitions in Colorado, Massachusetts, and New York; Digital Connection Committees in Minnesota; Regional Digital Inclusion Alliances in Ohio; and Regional Digital Opportunity Plans in Virginia).

Implementation strategies cited by multiple states, whether in service of individuals with a language barrier or all covered populations, include:

- Funding community organizations for digital inclusion programming (Colorado, Massachusetts, Minnesota, New York, Ohio, and Virginia);
- Multilingual and/or culturally competent digital inclusion services (Colorado, Georgia, Hawai'i, Nevada, New York, and Virginia);
- **Digital navigators** (Colorado, Georgia, Hawai'i, Massachusetts, Nevada, and New York);
- Peer-led digital literacy training programs and resources (Georgia, Hawai'i, and New York);
- Integrating digital skills training into job training services (Georgia, Hawai'i, and New York);
- Centralized hubs with digital inclusion information and resources for the public (New York, and Virginia); and
- Multilingual outreach to build community awareness of existing digital literacy programming (Nevada, and New York).¹²⁴

Several innovative strategies were articulated by only one state, including the following:

- Financial incentives and wraparound services to address barriers to participation in digital literacy training (New York);
- Tailored digital literacy programming on adult education platforms (Georgia);
- Device refurbishing and technical support training programs at community colleges to increase access to affordable devices in rural communities (Colorado);
- Community technical support in multiple languages in each community, with availability outside of typical working and school hours (Nevada); and
- Digital skills training for immigrants focused on 1) virtual communication tools to help families stay connected, and 2) immigration paperwork and applications for benefits (Hawai'i).¹²⁵

¹²³ This list is non-exhaustive.

¹²⁴ This list is non-exhaustive.

RECOMMENDATIONS AND OPPORTUNITIES

World Education recognizes that the State Digital Equity Plans represent just the beginning of an unprecedented process that seeks to identify and address digital inequities by co-creating with communities viable solutions and that states will continue to develop, revise, and refine their strategies over the five-year implementation period, and beyond.

With this in mind, based on our analysis, we provide the following policy- and practice-related recommendations to enhance states' work:

- **In serving individuals with a language barrier, every state should embrace adult immigrants and refugees as a key subpopulation.** According to the federal [Enhancing Access for Refugees and New Americans \(EARN\)](#) project, digital equity strategies are critical to immigrant success. At the same time, states should recognize that not all immigrants and refugees have language barriers and that their education and literacy levels can range from highly educated to non-literate in languages other than English. This more nuanced understanding will support states in creating and implementing appropriate interventions to strengthen immigrants' and refugees' digital access and skills, which in turn will improve their and their families' education, economic, health, and social and civic outcomes.
- **All states should draw on the experience, expertise, and reach of their adult education systems and providers.** Most adult education providers already integrate digital skills training into their instruction, and the U.S. Department of Education has invested in building the capacity of adult education practitioners and programs to advance their learners' digital resilience through the federal [Digital Resilience in the American Workforce \(DRAW\)](#) initiative. In addition, the proposed bill for the reauthorization of the Workforce Innovation and Opportunity Act (WIOA), [A Stronger Workforce for America Act \(ASWA\)](#), revises the definition of adult literacy to include digital literacy. Intentionally including adult education providers, along with library and workforce partners, will ensure states reach not only individuals with a language barrier but also other covered populations. Considering that the vast majority of adult learners fall into multiple covered populations, this strategy has a significant potential impact.
- **To track and assess progress in implementation, states should develop processes to regularly collect, report, and analyze key performance indicators (KPIs), particularly with regard to digital literacy.** States can draw on one of the many existing digital skills standards and frameworks, such as [Northstar](#) or World Education's [BRIDGES Digital Skills Framework](#), to map skill goals and measure individuals' attainment of milestones. The federal Digital Resilience in the American Workforce (DRAW) initiative offers an analysis of digital skills frameworks in its [national landscape scan report](#) (pp. 8-10) and a [brief on digital skills assessments](#).
- **States should actively seek insights from one another regarding state-level, regional, and local approaches and innovations.** Several states profiled in this document funded (or plan to fund) multi-sector, regional coalitions and other collaborative efforts to cultivate statewide digital equity ecosystems and promote tailored digital inclusion programming. As an example of another collaborative model, the [Innovating Digital Education in Adult Learning \(IDEAL\) Consortium](#) convenes and provides technical assistance and professional learning opportunities for over

20 member states so that adult education leaders can learn from each other's approaches to and innovations in advancing digital inclusion and learning for adults developing foundational skills. With many states employing similar implementation strategies, they should align their efforts and share resources instead of working in isolation.

- **States should align their efforts to center cultural responsiveness and language access as key components of every implementation strategy.** Recognizing that the development and implementation of culturally responsive, multilingual digital inclusion services require significant investments and capacity, we recommend that states a) proactively share successful community-centered solutions and b) collaboratively develop multilingual digital inclusion resources through investment in open educational resources (OERs) that local organizations can then adapt for their needs. World Education's **CrowdED Learning** initiative is one example of such an effort, with educators and digital inclusion providers across the country contributing instructional resources to the open **Digital Skills Library**, including bilingual resources.
- **States should support the capacity of trusted, experienced community organizations to provide digital inclusion services to covered populations through grant programs.** A core strategy for many states, grant programs will ensure that community organizations with experience and expertise, including supporting specific immigrant and refugee communities, can build on the work that many of them have already been doing for decades. For example, embedding digital navigation in existing services ensures that communities' digital needs, including broadband and device access and digital skills, can be met at a single location.
- **States should maintain their Digital Equity Plans as living documents.** Since this level of investment in digital equity is unprecedented, we anticipate that states will have new insights and data to share every year as they continue to build the infrastructure for statewide digital inclusion work. State Digital Equity Plans should be regularly re-evaluated and updated to reflect these efforts.

¹²⁵ "IELCE Immigrant Integration Framework."

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APPENDIX

Drafts of State Digital Equity Plans

- Colorado Digital Access Plan Draft
- Georgia Digital Connectivity Plan Draft
- Hawai'i Digital Equity Plan Draft
- Maryland Statewide Digital Equity Plan Draft
- Massachusetts Digital Equity Plan Draft
- Minnesota Digital Opportunity Plan Draft
- Nevada Statewide Digital Equity Plan Draft
- New York State Digital Equity Plan Draft
- Ohio Digital Equity Plan Draft
- Virginia Digital Opportunity Plan Draft

Acronyms

ACP Affordable Connectivity Program

ESL English as a Second Language

ESOL English for Speakers of Other Languages

KPI Key performance indicator

LEP Limited English proficient

WIOA Workforce Innovation and Opportunity Act



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