



# WORLD EDUCATION

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To: Department of Commerce, National Telecommunications and Information Administration

From: World Education, Inc.

Re: NTIA-2021-0002-0001

<https://ntia.gov/files/ntia/publications/fr-iija-broadband-rfc.pdf>

Established in 1951, World Education, Inc. ([www.worlded.org](http://www.worlded.org)) is a global nonprofit that advances economic mobility and better life outcomes through education for vulnerable people and communities. Our work is driven by a vision of social, economic, and racial justice whose achievement is aided by the transformative power of education. Equity, inclusion, integrity, collaboration, responsiveness, quality, and respect for the experience and knowledge of people and communities we work with are key values that undergird our work.

Founded in 2015, The EdTech Center @ World Education ([www.edtech.worlded.org](http://www.edtech.worlded.org)) is the leading provider of professional development to adult education and workforce development practitioners in the U.S. on integrating technology in instruction, developing digital skills, and advancing digital equity for adults still developing foundational skills. The EdTech Center @ World Education (ETC @ WEI) coordinates the Innovating Distance Education in Adult Learning (IDEAL) Consortium between states and has provided technical assistance to the Department of Education Office of Career, Technical and Adult Education on various initiatives focused on digital equity including by developing the [Transforming Distance Education](#) course and now co-leading the [Digital Resilience in the American Workforce](#) project for which we just submitted a national landscape scan to the Department of Education.

ETC @ WEI also designed in 2019 the [Digital US](#) national digital equity coalition between diverse stakeholders -- including leading digital inclusion and workforce advocates and providers, researchers, policymakers, and employers -- to ensure all adults have the digital skills and resilience to thrive in work and life by 2030.

World Education commends the NTIA on a robust set of questions in this public comment opportunity. We have limited our responses to our area of expertise - digital equity - and specifically NTIA's questions on the Digital Equity Planning Grant Program.



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- A. NTIA asks in question #25: **What are the best practices NTIA should require of states in building Digital Equity Plans? What are the most effective digital equity and adoption interventions states should include in their digital equity plans and what evidence of outcomes exists for those solutions?**

Work under the Digital Equity Act begins with statewide strategic planning for digital equity. This opportunity is in addition and complementary to the massive investments in broadband infrastructure in the Infrastructure Investment and Jobs Act, and so DEA's focus needs to be on adopting technologies and integrating quality technology use in the lives of community members who currently have inequitable access and adoption.

1. NTIA's experience with the Broadband Technology Opportunities Program (BTOP) should inform the Digital Equity Act implementation, but explicitly move beyond BTOP and not replicate its programming. For example, Public Computer Centers are not a solution for 2022 when most internet use is mobile and the greatest need is for personalized, just-in-time support to navigate internet technology to address critical needs, including telehealth, remote learning, job search, and more. State Offices of Broadband are small and often newly established, where they exist at all. While Offices of Broadband are the perfect choice for many of the upcoming NTIA investments in infrastructure, these offices are not likely to have the breadth of experience with covered populations needed to create comprehensive digital equity plans. Digital equity will be achieved when the covered populations have the services needed to bring them into parity with the general population, not when they are offered a separate and unequal solution.
2. The DEA planning template needs to clearly state that a Governor can appoint an administering entity and the role of that administering entity is to bring identified stakeholders to the planning process. In every state, there are public systems that represent providers and constituents that DEA is intended to serve. These systems can bring not only expertise in covered populations but also examples of current digital equity initiatives that can be invested in and scaled through DEA. NTIA's guidance should mandate the inclusion of public systems serving covered populations through community anchor institutions in the core DEA planning leadership, including:
  - Covered household/low-income serving systems include TANF, SNAP, HUD;
  - Aging individuals serving systems include state departments on aging, Medicaid, Senior Community Service Employment Program (SCSEP);
  - Incarcerated individual serving systems include state departments of corrections;
  - Veterans serving systems include state veterans services;
  - Individuals with disability serving systems include WIOA title IV vocational rehabilitation services;
  - Language barrier serving systems include WIOA Title II adult education;

- Racial or ethnic minority serving systems include state offices of new Americans, state diversity, equity, and inclusion offices, WIOA Titles I & II; Perkins Career Technical Education; and
- Rural serving systems include state offices of rural development, state offices of rural health.

Community anchor institutional state representatives include public school leadership, public housing administrations, statewide library agencies, major healthcare providers, community college and adult education leaders, and more.

3. Implementation and use of these resources by the mentioned populations is most effective when implemented by organizations that these communities trust. States must be intentional in including a percentage of organizations led by historically marginalized and disadvantaged groups or organizations proven to directly serve these populations.
4. Building digital skills is a vital aspect of digital equity. A recent landscape scan completed by the EdTech Center @ World Education confirmed that access to the internet and devices is not sufficient for digital equity. While the scan identified over 30 frameworks created for digital literacy and skills, there is great variability in those frameworks. This points to the need for clear definitions outlined in the Digital Equity Plans. The scan also identified a frequent misunderstanding - a belief that digital skill development happens by purchasing software or a tool on which a learner starts to work. The reality is that digital literacy and skill development works best with explicit instruction to help learners' use technology to accomplish their goals and is not tied to a specific tool; therefore, Digital Equity Plans should not focus exclusively on the purchase of tools and software but, more importantly, on the explicit development of digital literacy and skills. Additionally, the landscape scan confirmed a need for more extensive digital literacy and skills assessment that extends beyond software and tool use but also to critical thinking, problem-solving, and digital resilience - as defined by the Digital US coalition in its report (<https://digitalus.org/download/>). This need was made evident not only in WIOA Title II programs but also for employers.
5. The language barrier is broad and points to adult education services both for immigrants and refugees with English learning needs and native English speakers with foundational skill needs. Evidence of effective models documented in the landscape scan through the recently concluded [Remote ESOL Project](#) revealed an array of tech tools and approaches being used by Adult ESOL providers at a growing level of sophistication. Our analysis made visible several key implementation areas for digital skill development that buoy starting, scaling, or improving current implementation:
  - Student recruitment and orientation;
  - Instructional platforms, materials, and approaches;
  - Student persistence strategies;

- Student access to digital skills, devices, and internet;
- Support for students' basic needs;
- Professional development and support for staff; and
- Partnerships and leadership.

## What we learned.



<https://edtech.worlded.org/remote-esol-project>

The benefits of Remote Instruction are well-documented. Remote Adult ESOL services have solved to varying extents the design shortfalls and opportunity constraints of set schedules of in-person programming. We learned that remote designs are conducive to more flexible, multi-faceted and frequent learning opportunities and to leveraging technology for more differentiated and personalized instruction. Remote programs can facilitate higher levels of participation, promote persistence, increase intensity of instruction, and can lead to achieving greater gains in shorter periods of time.

All Remote ESOL programs in our study acknowledged and found ways to address the need to treat digital literacy skills not only as key foundational skill to facilitate remote learning but also to navigate daily life, support their children's remote learning, and increase the competitiveness of students in the labor market, as digital literacy skills are now expected of workers and in most spheres of life. Remote ESOL is building a future for new community members. While remote ESOL services are likely not a wholesale substitute for in-person delivery for all students or a panacea for current system capacity and performance shortfalls and variability in program effectiveness, they can be a great way to complement the capacity of in-person programs and add new capacity through remote learning only.

Digital literacy is imperative. State DEA plans need to make an investment in these Remote ESOL programs to springboard the systemic change needed. It is clear that digital literacy is no longer an optional nice addition to program offerings but an essential skill.

6. Invest in existing systems of digital equity services – adult education, libraries, public housing – and leverage the strategies these existing providers already have in place. Do not replace existing systems with proprietary products or untested new actors in this space. Trusted entities exist and should be prioritized in state plans.
7. Focus on mobile technologies. BTOP’s Public Computer Centers were a strategy for a past era. The DEA planning template needs to explicitly move states beyond these separate and unequal strategies for reaching covered populations and ask for investments to support mobile technology use and build mobile technology skills.
8. Digital navigator strategies are proven effective. According to our reporting in [Digital US](#), fewer than 10% of adults who need additional digital skills are accessing training. While leaders are making historic investments in expanding access to broadband, many families with home internet are not ultimately utilizing it to address their needs. This is caused in part by a lack of access to adequate devices and the absence of available, high-quality digital skill development training and just-in-time coaching programs. Further complicating the issue, over half of Americans reported being uncomfortable using technology to learn. Digital US, with its diverse coalition partners, designed the digital navigator program to train staff and volunteers to support learners by providing just-in-time, individualized supports for assessing devices, internet, and relevant digital literacy training with flexible options to participate. The program is designed to be easily replicated and scalable. Digital US [published resources and best practices](#) to help establish new programs or strengthen existing ones. As well, Digital US partner National Digital Inclusion Alliance (NDIA) has developed additional resources. Examples of digital navigation services in communities include:
  - Ramsey County TechPak program gave out 2,150 Techpaks to residents of Ramsey County in Minnesota affected by COVID through a lottery system. Each TeckPak included a laptop, hotspot, free wifi for a year, printed easy-to-understand guides in 5 languages, and provided digital navigation services.
  - Sitting Bull College, a postsecondary educational institution on the Standing Rock Reservation located in southern North Dakota and northern South Dakota, launched its Digital Navigator program by leveraging AmeriCorps members to assist learners pursuing GED preparation online. Their Digital Navigators support learners to onboard to loaner devices, set up emails, and familiarize them with software and online programs such as Microsoft Office.

- NDIA conducted a digital navigator pilot program in partnership with Salt Lake City Libraries and Urban Libraries Council, embedding Digital Navigators within trusted community groups. The program found success when it provided training at multiple, easily accessible locations while also ensuring navigators could be available to work either remotely or in-person and at times that matched participants' availability. As of July 2021, the Salt Lake program reached 558 individuals and provided over 150 devices and 24 hotspots.
- Some learner testimonials:
  - "I would not have been able to do job searches, work on my resume, or enroll in an online course (even if the course was free!) as I did not have a laptop. The program gave me a laptop and taught me to use it, and it was so helpful!"
  - "I was unable to learn online as the one computer in the house was needed for my kids to connect to their classes. This program provided me with a device, helped me set it up, answer my questions, and connected it to the internet. Now I am learning online and so are my kids!"

9. Ensure equitable access - meaning eligibility requirements for certain programs should not be used here. While partnership with WIOA Title II adult education, WIOA Title I adult, youth, dislocated worker, WIOA Title IV vocational rehabilitation services, TANF, SNAP E&T and more should be prioritized, the eligibility criteria within each of these systems should NOT be a barrier to accessing digital equity services through the State Digital Equity Plan. NTIA's planning document should clearly call out the need for both prioritizing covered populations while not restricting the interpretation of those populations by other system criteria.

B. NTIA asks in question #26: **What types of technical assistance, support, data, or programmatic requirements should NTIA provide to states and territories to produce State Digital Equity Plans that fully address gaps in broadband adoption, promote digital skills, advance equitable access to education, healthcare and government services, and build information technology capacity to enable full participation in the economy for covered populations? What steps, if any, should NTIA take to monitor and assess these practices?**

State plans should define measurable objectives and these accountability measures need to be carefully crafted to drive intended practice rather than to incent perverse behavior, e.g., 'creaming' to serve only those individuals who can clearly achieve a measured objective.

1. NTIA can explicitly identify the data sources to be used in establishing need within the planning template. NTIA can guide states in concisely documenting need and not spending copious time and resources on more studying of need.

2. NTIA can require WIOA state plan and Perkins state plan partners to bring their strategic and operational plans to the table to build upon. NTIA can learn from WIOA and Perkins state plan processes: States spend a great deal of energy on identifying problems rather than solutions. States largely respond only directly to planning template prompts. State plans cannot foresee the future (e.g., a pandemic) and so need to define a strategic vision and leave implementation to providers closer to the community.
3. NTIA can bring state and local leaders in digital skill building together for a working group to develop objective measures of digital skill gain. Much terrific work has been done in this area (e.g., Seattle, Maryland, Texas) and these early adopters could offer expertise and technical assistance to other states and communities. National efforts to align efforts across states or regions on digital skill definitions and objectives such as by the Digital US Coalition should be supported as well for optimized impact given employers, workers, and training providers both work and move across states. NTIA should guard against states ‘buying solutions’ wherein DEA funds enrich companies selling products and services. A lasting digital equity solution will come from communities and the embedded systems that serve them, not from a vendor. Additionally, any public investments in content development including training curriculum or development of digital badges or assessments should be required to be made open source, even if delivered through a proprietary platform, so that states and local programs can use and adapt them as needed to optimize impact and use them for little to no-cost.
4. NTIA could encourage and support community anchor agencies with technical assistance to include digital equity outcomes into their overall outcomes and embed digital inclusion services into their programming, including with training of existing staff to take on the role of providing digital navigator services.
5. NTIA could leverage the work of the [Innovating Distance Education in Adult Learning \(IDEAL\) Consortium](#) as a network of value that exists across nineteen states. IDEAL Consortium states work together to make quality distance and blended learning possible for adult learners. The Innovating Distance Education in Adult Learning (IDEAL) Consortium helps member states establish quality innovative distance and blended learning programs by offering professional development, providing technical support, and facilitating a network of education leaders from across the country. We aim to ensure that all learners have access to quality learning opportunities beyond the classroom.
6. NTIA should establish targets for service to the covered populations, i.e., what percentage of engagement and service is with covered households; what percentage of engagement and service is with people experiencing a language barrier, with the understanding that many



people will fit into more than two categories and that data also should be collected and prioritized.

C. NTIA asks in question #27: **How should NTIA ensure that State Digital Equity Plans and the plans created by states and territories for the BEAD program are complementary, sequenced and integrated appropriately to address the goal of universal broadband access and adoption?**

1. DEA planning templates should clearly call for the use of BEAD analysis in DEA plans AND for DEA plans to then pick up the strategic line for building digital adoption through targeted digital skill building and digital navigation services in communities where BEAD has laid new infrastructure.
2. BEAD planning will establish a battle order for addressing the largest gaps in broadband access and infrastructure in states. BEAD analysis of need and strategic plan for addressing that need should be referenced in state DEA plans, but not replicated. BEAD should establish the access and DEA should establish the adoption through provision of digital navigators to assist new users' orientation to devices and internet services AND digital skill building.
3. BEAD mandates mapping of broadband infrastructure gaps. The mapping may reveal that a state has established many areas of robust broadband infrastructure and will not need all of the BEAD resources for hardware. Both the BEAD and the DEA guidance should explicitly note that BEAD resources can be used to support DEA state plan strategies for increasing equitable access and adoption of digital resources through digital skill building and digital navigation services for covered populations through community anchors.

D. NTIA asks in question #28: **How should NTIA ensure that State Digital Equity Plans impact and interact with the State's goals, plans and outcomes related to: (i) Economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C)?**

Digital Equity Act planning and investment must be aligned to existing systems and services that work to support covered populations.

1. As identified in A2, state systems and state plans exist specific to serving covered populations. Representatives of these systems need to not only bring *existing* plans to the DEA planning table but also identify operational elements currently in place to support digital equity, digital inclusion, and digital resilience in covered populations. State DEA planning template should ask states to detail existing successful strategies for continued investment as well as envisioning new partnerships and new initiatives.



2. The \$1.75B for DEA plan implementation should invest in systems and strategies that can slingshot digital equity efforts forward past the 4 years of DEA formula investment into the future. This means not opening separate ‘public computer centers’ or standing up new offices just to see them close, but truly investing in digital equity through established networks and partners. However, those established systems should be incentivized to create the most diverse set of partners and practices possible.
  3. Regarding objectively measuring digital literacy skill gain in covered populations, NTIA can bring state and local leaders, and national leaders like [World Education’s EdTech Center](#) and its coordination of the national [Digital US](#) coalition, in digital skill building together for a working group to develop objective measures of digital skill gain based on their established frameworks and standards (e.g., Northstar Digital Literacy, Seattle Digital Equity Framework). Much terrific work has been done in this area, and these early adopters could offer expertise and technical assistance to other states and communities.
  4. Again, NTIA should guard against states ‘buying solutions’ where DEA funds will enrich companies selling products and services. The best digital equity solutions will come from communities and the embedded systems that serve them, not from a vendor.
- E. NTIA asks in question #30: **What steps should NTIA take to ensure that states consult with these groups [covered populations] as well as any other potential beneficiaries of digital inclusion and digital equity programs, when planning, developing, and implementing their State Digital Equity Plans? What steps, if any, should NTIA take to monitor and assess these practices?**

WEI commends NTIA’s focus on needed coordination among state and local stakeholders to create impactful Digital Equity State Plans. Engagement and true collaboration with covered populations must begin at the beginning of planning, not solely in a mandated comment period long after a plan is written.

1. The DEA administering entity in a state must set a very inclusive table with all the state agencies that currently serve the covered populations who will be required to represent their local partners/grantees in bringing needs and best practices to the planning process.
  - a. Include the state Office of New Americans, where it exists.
  - b. Include TANF, SNAP E&T, HUD E&T, TRIO, EOC, WIOA core and required partners, and Perkins V Career and Technical Education partners.
2. Mandating a certain number of public comment sessions is not enough. Many public comment sessions on state WIOA and Perkins plans were sparsely attended by very few members of the public. NTIA’s planning template should mandate technology enhanced

ways to engage the public to offer comments (e.g., through social media platforms) and not rely on old models of public meetings alone.

F. NTIA asks in question #31: **How should NTIA assess whether a state has engaged in adequate coordination with its political subdivisions?**

A state plan must articulate a shared vision for digital equity with local and regional leaders who should include digital equity outcomes into the measurement of their impact.

1. WIOA and Perkins state plans have developed infrastructure for including local governments and other political subdivisions in statewide planning. Use the mechanisms that exist to engage with local and regional political entities rather than developing new ones.
2. The plan template can require documentation of county and city local elected officials' plan development and coordination with local and regional digital equity efforts.

Sincerely,



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