



**WORLD EDUCATION**

# **Adult Education in Focus: An Annotated State Digital Equity Plan Template**

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# Adult Education in Focus: An Annotated State Digital Equity Plan Template

The digital divide disproportionately affects marginalized and disadvantaged communities, exacerbating existing inequities and hindering their access to resources that can expand educational opportunities, employment, and economic advancement. Adult education programs serve and are deeply connected to many of these communities and must be included in State Digital Equity Plans to ensure that communities facing systemic barriers to digital access and inclusion will benefit from the opportunities the [Digital Equity Act](#) aims to provide.

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**The overwhelming majority of adult learners fall into more than one of the covered populations prioritized under the DEA.**

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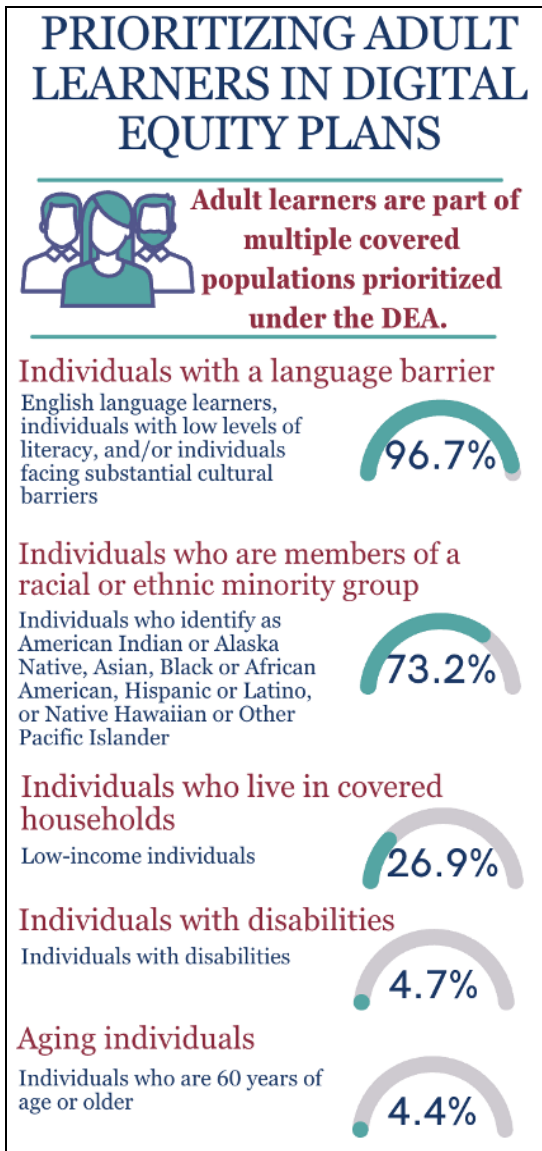
**World Education’s Annotated State Digital Equity Plan Template for Adult Education** offers leaders, advocates, and providers language and recommendations to ensure the inclusion of adult education learners, especially individuals with a language barrier, in state digital equity planning and implementation.

The **Digital Equity Act (DEA)** is a law that aims to bridge the digital divide and ensure that everyone can participate fully in the digital age, regardless of their income, background, or location. It allocates \$2.75 billion in funding via three grant programs that promote digital equity and inclusion. Together, these three grants “aim to ensure that all people and communities have the skills, technology, and capacity needed to reap the full benefits of our digital economy.”<sup>1</sup> Through the first grant, the [State Digital Equity Planning Grant Program](#), states have received one-time funding to draft a comprehensive State Digital Equity Plan to increase access and promote opportunities for historically underserved groups, including low-income households, aging populations, incarcerated individuals, veterans, people with disabilities, people with language barriers, racial and ethnic minorities, as well as rural communities – all of whom are defined as “covered populations” under the DEA. In the next grant, the State Digital Equity Capacity Grant, states will submit their completed State Digital Equity Plans to receive funding for implementation. DEA funding is administered by the U.S. Department of Commerce’s National Telecommunications and Information Administration (NTIA).

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<sup>1</sup> <https://www.internet4all.gov/program/digital-equity-act-programs>

**Adult education providers have a vital role in addressing the digital divide.** Adult education is provided by a variety of institutions and organizations, including community



colleges, public schools and libraries, correctional facilities, nonprofit organizations, and government agencies. In addition to their expertise in delivering digital literacy training and other digital inclusion services for the listed covered populations, adult education organizations have meaningful relationships with the communities they serve. This trust and their expertise can and should be leveraged to facilitate the adoption of digital technologies and improve digital literacy, resulting in better educational and economic opportunities for individuals and communities.

This guidance, created by World Education’s [Transforming Immigrant Digital Equity \(TIDE\)](#) project, is an annotated version of NTIA’s [State Digital Equity Plan Template](#) and provides insights using an adult education lens. It is intended to be used by both those in charge of ensuring the implementation of the Digital Equity Act at the state level and adult education leaders, providers, and advocates who work with adult learners to ensure learners’ needs are addressed.

## How to use the annotated template

This guidance preserves the formatting of the original State Digital Equity Plan Template but includes recommendations from the adult education perspective for those involved in DEA planning. NTIA’s template adheres to the 15 requirements laid out in the [Notice of Funding Opportunity for the State Digital Equity Planning Grant](#).

The original text, which is indicated by a gray line to the left, offers an overview of the purpose of each proposed section. NTIA also provides official [Digital Equity Plan Guidance](#) to outline the requirements of each section, explain the significance of the content, and suggest other information and data that the State may wish to consider when developing its Digital Equity Plan. As you walk through our annotated version, you will see a call to read “World Education Comments” in red. These comments are the guidance you will want to direct your attention to.

As you engage with the team that is leading DEA work in your state, we hope this guidance offers language, recommendations, and suggestions you can use to ensure you, your learners, and the adult education field at large are included in State Digital Equity Plans as providers, connectors, and experts.

## Other resources

This guidance is intended to be used in conjunction with other resources developed by World Education to support advocacy efforts around the Digital Equity Act. To learn more about and engage in your state’s efforts, we recommend the following:

1. Identify how your work connects to the Digital Equity Act and how you can support your state’s planning efforts using our [Getting Started with Digital Equity Act Advocacy worksheet](#).
2. Identify who is leading Digital Equity Act planning and implementation in your state using our [list of Digital Equity Act leads and activities by state](#).
3. Identify and participate in any stakeholder engagement efforts being conducted in your state.
4. For deeper engagement and advocacy, identify the areas of your state’s Digital Equity Plan you are best positioned to be involved in using this Annotated State Digital Equity Plan Template for Adult Education – and bring others along with you.

# Annotated State Digital Equity Plan Template for Adult Education

## Overview

This annotated State Digital Equity Plan Template provides guidance on how adult education leadership, providers, and advocates can play a critical role in connecting Digital Equity Act (DEA) administering entities and working groups to target populations – especially individuals with a language barrier. Through this work, the field can, in turn, ensure the inclusion of adult education students (referred to as “adult learners”) in State Digital Equity Plans.

This guidance was written with the following audiences in mind:

- (1) Digital Equity Act (DEA) administering entities;
- (2) State DEA working groups;
- (3) Adult education leadership, including State adult education offices; and
- (4) Adult education providers and advocates.

This guidance is not intended to be comprehensive, as both the [National Telecommunications and Information Administration \(NTIA\)](#) and trusted leaders such as the [National Digital Inclusion Alliance \(NDIA\)](#) have provided detailed guidance on other aspects of state planning. We also hope that leadership, providers, and advocates for other covered populations will provide similar guidance in support of the people they serve.

## How to use this tool

This guidance is an annotated version of NTIA’s [State Digital Equity Plan Template](#), which references NTIA’s official [Digital Equity Plan Guidance](#). The annotations include recommendations – as opposed to sample Digital Equity Plan language – for those involved in DEA planning. Where we do not have recommendations, the section has been left intentionally blank.

Where possible, the formatting of the original State Digital Equity Plan Template has been preserved. To visually distinguish NTIA’s guidance from World Education’s annotations, we have added a gray line to the left of the original text.

## What is adult education?

The [U.S. Department of Education’s Office of Career, Technical, and Adult Education \(OCTAE\)](#) defines adult education as services that “[enable] adults to acquire the basic skills necessary to function in today’s society so that they can benefit from the completion of secondary school, enhanced family life, attaining citizenship and participating in job training and retraining programs.”

Adult education programming encompasses the following:

- (1) Basic skills (pre-high school-level) instruction;
- (2) High school-level instruction;
- (3) High school equivalency preparation;
- (4) English for Speakers of Other Languages (ESOL) instruction; and
- (5) Workforce preparation activities, civics education, and digital literacy instruction integrated into any of the above.

Federal funding for adult education services is administered by OCTAE via Title II of the Workforce Innovation and Opportunity Act (WIOA), also known as the Adult Education and Family Literacy Act (AEFLA). Between July 1, 2020, and June 30, 2021, 725,127 learners enrolled in AEFLA-funded adult education services.<sup>2</sup>

**To close the digital divide and create a more equitable future with improved educational and economic opportunities for all, adult education leaders, providers, and advocates need to lead the way in Digital Equity Act state planning and implementation.**

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<sup>2</sup> “Table SPR: Statewide Performance Report 2020-2021.” National Reporting System for Adult Education. U.S. Department of Education. Accessed January 30, 2023. <https://nrs.ed.gov/rt/reports/aggregate/2020/all/table-spr>.

## Why include adult learners in State Digital Equity Plans?

The overwhelming majority of adult learners fall into more than one of the covered populations prioritized under the DEA. Of the 725,127 learners receiving AEFLA-funded adult education services in 2020-2021:

AEFLA Learners Served (% of Total)	AEFLA Population	DEA Covered Population
<b>701,469 (96.7%)</b>	English language learners, individuals with low levels of literacy, and/or individuals facing substantial cultural barriers	Individuals with a language barrier
<b>530,799 (73.2%)</b>	Individuals who identify as American Indian or Alaska Native, Asian, Black or African American, Hispanic or Latino, or Native Hawaiian or Other Pacific Islander	Individuals who are members of a racial or ethnic minority group
<b>195,103 (26.9%)</b>	Low-income individuals	Individuals who live in covered households
<b>33,734 (4.7%)</b>	Individuals with disabilities	Individuals with disabilities
<b>31,774 (4.4%)</b>	Individuals who are 60 years of age or older	Aging individuals

*Figures total more than 725,127 (100%) because learners may fall into more than one AEFLA population.*

### Looking for data on your state?

Access the [National Reporting System for Adult Education](#) for learner data from 2020-2021.

## Why include adult education providers in State Digital Equity Plans?

Depending on the state, AEFLA-funded adult education services may be delivered by one or more of the following entities:

- Local educational agencies
- Adult schools
- Community colleges
- Community-based organizations
- Libraries
- Correctional facilities
- Faith-based organizations

The DEA names State adult education systems as key stakeholders: **because of their expertise in serving multiple covered populations, connections to local communities, and experience with providing digital literacy instruction and assessing digital skills, adult education providers can play a critical role in both the planning and the implementation of State Digital Equity Plans.** For example, during the planning phase, an adult education provider could leverage their learners and community connections to conduct outreach for a statewide needs assessment or provide considerations regarding the design of such an assessment so that it can be readily understood by individuals with language barriers. During the implementation phase, an adult education provider could be tapped to deliver or scale up digital inclusion services, including digital literacy instruction and technical support.

While this guidance focuses on including AEFLA-funded adult education providers, it is important to note that not all adult education providers receive AEFLA or other types of government funding. Such providers should also be included in State Digital Equity Plans.



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# INTERNET FOR ALL

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## State Digital Equity Plan Template



U.S. Department of Commerce  
National Telecommunications and Information Administration

## NTIA's Original Text:

**Note:** This document is intended to serve as an organizational tool that supports each State/Territory in capturing notes and developing its State Digital Equity Plan. Each State/Territory should review the State Digital Equity Plan Guidance document and speak with their designated Federal Program Officer (FPO) prior to using this document.

## World Education's Annotations by Section

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NTIA's original table of contents has been omitted to minimize confusion.

**NTIA's Original Text:**

# Internet For All

## 1 Executive Summary

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*Refer to Section 1 of the State Digital Equity Plan Guidance.*

[Insert summary of State Digital Equity Plan, restating purpose and key points of the plan]

## 2 Introduction and Vision for Digital Equity

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### 2.1 Vision

*Refer to Section 2.1 of the State Digital Equity Plan Guidance.*

[Insert state/territory's vision for digital equity]

### World Education's Comments:

According to the [State Digital Equity Plan Guidance](#) (p. 5), NTIA recommends: *Each State may use this section to describe what success looks like for their State, inform strategies, serve as a guide for setting goals and objectives, and determine the activities the State will prioritize in the Digital Equity Plan.*

World Education recommends including the leveraging of adult education providers and their experience in delivering digital inclusion services as one strategy for statewide success and/or as a prioritized activity in the Digital Equity Plan. Adult education providers have expertise in serving multiple covered populations (especially individuals with a language barrier – see table on p. 3), connections to local communities, and experience with providing digital literacy instruction and assessing digital skills.

NTIA guidance (p. 5) also notes: *States that are also utilizing funding from the Broadband Equity, Access, and Deployment (BEAD) Program should ensure that the programs and plans are coordinated and that the visions for BEAD*

#### What is BEAD?

Like the DEA, the [Broadband Equity, Access, and Deployment \(BEAD\) Program](#) is funded by the Infrastructure Investment and Jobs Act of 2021. BEAD will invest \$42.5 billion in high-speed internet access over five years, with a focus on connecting unserved and underserved areas. States are required to develop a Five-Year Action Plan that aligns with their State Digital Equity Action Plan.

*and digital equity are aligned.*

While broadband *access* and *affordability* is an essential element of digital inclusion, digital equity cannot be achieved without meaningful *adoption* – which requires digital literacy and access to affordable devices. BEAD funding – which far exceeds DEA funding – already supports States in making significant investments in their broadband infrastructure. Therefore, States must ensure that DEA funding goes beyond broadband access and affordability to ensure the other elements of digital inclusion are purposefully addressed. Key to DEA is securing digital equity and inclusion for all covered populations.

### **NTIA’s Original Text:**

#### **2.2 Alignment with Existing Efforts to Improve Outcomes**

*Refer to Section 2.2 of the State Digital Equity Plan Guidance.*

[Insert overview of how the State Digital Equity Plan is aligned to the Eligible Entity’s priorities and other existing or planned efforts]

### **World Education’s Comments:**

Among other requirements, States must, according to [NTIA guidance](#) (p. 6), *detail how the stated objectives for digital equity will impact and interact with the following broader efforts and goals of the State:*

- *Economic and workforce development goals, plans, and outcomes<sup>3</sup>*
- *Educational outcomes<sup>4</sup>*
- *Health outcomes*
- *Civic and social engagement*
- *Delivery of other essential services*

Because WIOA sets explicit educational, employment, and civic engagement expectations and outcomes for AEFLA-funded programs, including adult learners and adult education providers in State digital equity efforts can have positive impacts in all of the above areas.

**Investing DEA funds in adult education providers to strengthen their digital inclusion services can especially address the following:**

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<sup>3</sup> “WIOA State Plan Portal.” U.S. Department of Education. Accessed January 30, 2023. <https://wioaplans.ed.gov/>.

<sup>4</sup> “Perkins State Plans and Data Explorer.” Perkins Collaborative Resource Network. U.S. Department of Education. Accessed January 30, 2023. <https://cte.ed.gov/pcrn/explorer>.

State Efforts and Goals	Existing or Potential Adult Education Services	Impact of DEA Investments in Adult Education Services
<b>Economic and workforce development</b>	Workforce preparation activities that integrate digital literacy instruction	Increased readiness of adult learners for employment at family-sustaining wages
<b>Education</b>	<p>Integrated and explicit digital literacy instruction</p> <p>Expanded statewide options for tech-enabled learning<sup>5</sup></p>	<p>Increased readiness of adult learners for high school equivalency credentialing and postsecondary enrollment</p> <p>Increased enrollment of covered populations in adult education and digital inclusion services</p>
<b>Civic and social engagement</b>	Civics education activities that integrate digital literacy instruction	Increased capacity of adult learners to engage in their community and the society and government of the United States

## Resource Spotlight: Impact of the Digital Divide

<p style="text-align: center;"><b><u><a href="#">Closing the Digital Divide Benefits Everyone, Not Just the Unconnected</a></u></b> <i>Common Sense &amp; Boston Consulting Group</i></p> <p>An analysis of how universal connectivity benefits education, health care, government, and employment, plus recommendations for state broadband leaders.</p>	<p style="text-align: center;"><b><u><a href="#">Closing the Digital Skill Divide: The Payoff for Workers, Business, and the Economy</a></u></b> <i>National Skills Coalition &amp; Federal Reserve Bank of Atlanta</i></p> <p>A real-time snapshot of demand for digital skills in the U.S. labor market.</p>
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<sup>5</sup> “Digital Resilience in the American Workforce: Advancing Access and Digital Equity.” EdTech Center @ World Education. Accessed February 3, 2023. <https://edtech.worlded.org/advancing-access-and-digital-equity/>.

## NTIA's Original Text:

### 2.3 Strategy and Objectives

Refer to Section 2.3 of the State Digital Equity Plan Guidance.

[Insert strategy and objectives, including how the strategies will help meet the State's goals]

#### What measurable objectives are States required to address?

Under the DEA, States are required to, for each covered population, develop measurable objectives for *documenting and promoting*:

- (1) The availability of, and affordability of access to, fixed and wireless broadband technology;
- (2) The online accessibility and inclusivity of public resources and services;
- (3) Digital literacy;
- (4) Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and
- (5) The availability and affordability of consumer devices and technical support for those devices.

#### World Education's Comments:

[NTIA guidance](#) (p. 7) also states the following: *For each topic above, provide a Key Performance Indicator (KPI) to measure progress, a baseline measure (if available), and a near-term and a long-term target.*

While adult education providers will be able to provide more detailed guidance specific to their learners and communities, World Education recommends the following considerations when developing measurable objectives for individuals with a language barrier:

- States engage adult education providers as key stakeholders, subject matter experts, and digital inclusion service providers as a critical strategy;
- State KPIs factor in gaps in awareness, access, availability, affordability, and inclusivity that primarily exist due to language and literacy barriers; and

- States develop and promote methods of measuring digital literacy beyond traditional approaches such as standardized testing or other product-driven approaches.<sup>6</sup>

## Resource Spotlight: Measurable Objectives

### [Digital Opportunities Compass: Metrics To Monitor, Evaluate, And Guide Broadband And Digital Equity Policy](#)

Quello Center

A measurement framework to assist in the development of state plans that meet the reporting and assessment requirements of the Infrastructure Investment and Jobs Act (IIJA) and DEA but go beyond access and affordability to fully harness the benefits of digital technology.

### [Lessons Learned In Workforce Innovation: How Six States Are Planning To Advance Digital Skills For Equitable Economic Participation](#)

*National Governors Association*

Lessons learned and case studies from six states for governors and state policymakers working to bridge the digital divide, plus a framework for creating state plans to advance digital skills.

### [Digital Equity Planning: 10 Recommendations for States & Cities](#)

*Digitunity*

Recommendations on developing systems to expand access to free and/or low-cost devices.

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<sup>6</sup> “Digital Resilience in the American Workforce: Selecting an Assessment for Digital Literacy.” EdTech Center @ World Education. Accessed February 3, 2023.

<https://edtech.worlded.org/selecting-an-assessment-for-digital-literacy/>.

NTIA's Original Text:

## 3 Current State of Digital Equity: Barriers and Assets

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### 3.1 Asset Inventory

*Refer to Section 3.1 of the State Digital Equity Plan Guidance.*

### World Education's Comments:

According to [NTIA guidance](#) (p. 8), each State's needs assessment must include *current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments.*

Programs that promote digital equity, including adult education programs, may not necessarily identify themselves as digital inclusion programs or describe their work as digital inclusion services. By identifying programs and strategies that work with covered populations first (rather than explicitly identified digital inclusion programs and strategies), States will build a more accurate and robust asset inventory.

### Resource Spotlight: Asset Mapping

#### [State Digital Equity Plan Toolkit](#)

*National Digital Inclusion Alliance*

Best practices, recommended processes, templates, and tools to support States in designing robust, comprehensive Digital Equity Plans, including a comprehensive section on conducting an asset inventory.

#### [Asset Mapping for Digital Inclusion](#)

*National Digital Inclusion Alliance*

Best practices and customizable tools for digital inclusion asset mapping, including state- and local-level examples.



## NTIA's Original Text:

### 3.1.1 Digital Inclusion Assets by Covered Population

Refer to Section 3.1.1 of the State Digital Equity Plan Guidance.

#### What are covered populations?

The DEA must prioritize “covered populations,” defined as:

- (1) individuals who live in “covered households” (households with an annual income that is at or below 150% the [federal poverty level](#));
- (2) aging individuals (individuals who are 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—
  - (a) are English learners
  - (b) 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](#).

#### World Education's Comments:

World Education strongly recommends including adult education providers as assets that promote digital equity for at least two covered populations: *individuals with a language barrier* and *individuals who are members of a racial or ethnic minority group*. Specific adult education providers may support or specialize in serving additional covered populations, which should also be noted.

Both programs that receive AEFLA funding and those that do not should be included. For a complete list of AEFLA-funded programs in their states, States should contact their State adult education office. To connect to non-AEFLA programs, States should ask their State adult

education office, AEFLA-funded programs, their State library association, and/or their State's office of New Americans.

#### **NTIA's Original Text:**

### **3.1.2 Existing Digital Equity Plans**

*Refer to Section 3.1.2 of the State Digital Equity Plan Guidance.*

### **What if a state already developed a digital equity plan prior to the passing of the DEA? What about municipalities?**

Even if a state has an up-to-date digital equity plan, if they received State Digital Equity Planning Grant funding, they must develop a new State Digital Equity Plan that is DEA-compliant. Local digital equity plans should be cataloged as assets, with their current gaps identified. That being said, DEA funding may be used to “supplement, not supplant” the critical, often groundbreaking, work of non-DEA digital equity plans.

#### **NTIA's Original Text:**

### **3.1.3 Existing Digital Equity Programs**

*Refer to Section 3.1.3 of the State Digital Equity Plan Guidance.*

### **3.1.4 Broadband Adoption**

*Refer to Section 3.1.4 of the State Digital Equity Plan Guidance.*

[Identify and detail the assets in the state/territory]

### **World Education's Comments:**

[NTIA guidance](#) (p. 9) provides a starting list of broadband adoption assets for States to identify and detail. From the list, the following programs and services are often offered by adult education providers:

- *Programs that provide digital literacy and digital skills training, including:*
  - *Digital skills training in service of workforce development;*
- *Digital Navigator programs;*

- *Programs that conduct awareness and outreach activities of digital inclusion programming and resources (e.g., marketing and awareness campaigns);*
- *Public computing labs;*
- *Loaner computer/hotspot programs.*

Adult education providers may also be part of digital equity/inclusion coalitions.

When identifying and detailing adult education providers for the asset inventory, States should ask whether providers offer any of the above or other digital inclusion services and whether they are involved with digital equity/inclusion coalition work.

#### **NTIA's Original Text:**

### **3.1.5 Broadband Affordability**

*Refer to Section 3.1.5 of the State Digital Equity Plan Guidance.*

*[Identify and detail the efforts in the state/territory]*

#### **World Education's Comments:**

[NTIA guidance](#) (p. 9) provides a starting list of broadband affordability efforts for States to identify and detail, including efforts regarding the [Affordable Connectivity Program \(ACP\)](#).

When identifying and detailing adult education providers for the asset inventory, States should ask whether providers assist learners with accessing the ACP and what steps they have taken to support and increase enrollment in the ACP.

#### **NTIA's Original Text:**

### **3.2 Needs Assessment**

*Refer to Section 3.2 of the State Digital Equity Plan Guidance.*

*[Identify baseline and barriers to digital equity]*

#### **World Education's Comments:**

According to [NTIA guidance](#) (p. 10), each State's needs assessment must include a *comprehensive assessment of the baseline from which the State is working and the State's*

identification of the barriers to digital equity faced generally and by each of the covered populations in the State.

## Resource Spotlight: Needs Assessments

### [State Digital Equity Plan Toolkit](#)

*National Digital Inclusion Alliance*

Best practices, recommended processes, templates, and tools to support States in designing robust, comprehensive Digital Equity Plans, including a comprehensive section on conducting a needs assessment.

### [Examining Gaps in Digital Inclusion as States Develop Their Digital Equity Plans](#)

*American Immigration Council*

Fact sheet with data to inform policymakers and advocates of the gaps in access to broadband internet among various covered individuals.

### **NTIA's Original Text:**

#### **3.2.1 Covered Population Needs Assessment**

*Refer to Section 3.2.1 of the State Digital Equity Plan Guidance.*

*[Identify baseline and barriers for covered populations]*

### **World Education's Comments:**

[NTIA gives the following guidance](#) on conducting a comprehensive needs assessment: *Identify barriers to digital equity that covered populations in the State face. Many barriers will have an associated need. Keep in mind that multiple barriers and needs could exist for a single covered population and that some barriers and needs are experienced by multiple covered populations. Barriers could include factors such as geography, de facto segregation, lack of education, lack of trust, and/or lack of institutional knowledge.*

Adult education providers can play critical roles throughout the needs assessment process, including but not limited to the following:

- Providing regional and local qualitative and quantitative data on the barriers to digital equity that individuals with a language barrier and other covered populations face;
- Connecting State DEA planning leads to individuals with lived experience;

- Providing design guidance to ensure public-facing needs assessment data collection methods (e.g., public surveys, listening sessions) are accessible to individuals with a language barrier and other covered populations; and
- Leveraging their learners and community connections for outreach and meaningful engagement throughout public-facing stages of the needs assessment process.

### Considerations for Individuals with a Language Barrier

Efforts to engage individuals with a language barrier must, at the minimum, utilize plain language (for English-language efforts), include appropriate translation and/or interpretation, and ensure accessible, offline alternatives. Adult education providers can offer further, detailed guidance regarding their learners and communities (e.g., translation needs for specific dialects).

As a starting point, World Education recommends the list of resources below:

Consideration	Resources
<p><b>Plain language</b> <i>Communication your audience can understand the first time they read or hear it<sup>7</sup></i></p> <p><i>Writing that is clear, concise, well-organized, and follows other best practices appropriate to the subject or field and intended audience<sup>8</sup></i></p>	<p><a href="https://www.plainlanguage.gov">PlainLanguage.gov</a> Official writing guidelines for understanding your audience, being clear and concise, and testing your content.</p> <p><a href="#">Plain Language Guide   ProLiteracy</a> Brief guidelines for writing in plain language, with clear examples.</p>
<p><b>Translation</b> Written “in-language” communication</p>	<p><a href="https://www.dhs.gov/lep">LEP.gov</a> Federal guidance on serving individuals with limited English proficiency, including resources for translation and interpretation.</p>

<sup>7</sup> “What is plain language?” The Plain Language Action and Information Network. U.S. General Services Administration. Accessed January 30, 2023. <https://www.plainlanguage.gov/about/definitions/>.

<sup>8</sup> Plain Writing Act of 2010.

<p><b>Interpretation</b></p> <p>Oral “in-language” communication, delivered simultaneously or consecutively</p>	<p><a href="#"><u>National Partnership for New Americans – Language Access Working Group</u></a></p> <p>A nationwide working group of practitioners engaging in language access efforts in their states and local communities. Contact Melissa Holguín Pineda at <a href="mailto:melissa@partnershipfornewamericans.org"><u>melissa@partnershipfornewamericans.org</u></a> for additional information.</p> <p><a href="#"><u>Language Access: Translation and Interpretation Policies and Practices</u></a>   <b>Migration Policy Institute</b></p> <p>A project created to assist local government administrators, policymakers, and others who are looking for ways to provide high-quality and cost-effective translation and interpretation services.</p> <p><a href="#"><u>Language Justice Toolkit</u></a>   <b>Communities Creating Healthy Environments</b></p> <p>A practical guide on the logistics of translation and interpretation, especially when planning events.</p>
<p><b>Offline Accessibility</b></p>	<p><a href="#"><u>State Digital Equity Plan Toolkit</u></a>   <b>National Digital Inclusion Alliance</b></p> <p>Best practices, recommended processes, templates, and tools to support States in designing robust, comprehensive Digital Equity Plans, including a section on different data collection and community outreach and engagement methods to ensure accessibility.</p>

These considerations, especially plain language and offline accessibility, benefit *all* covered populations, not only individuals with a language barrier. Given the purpose of the DEA – to achieve digital equity for many of the communities most affected by the digital divide – it is essential that States employ multiple methods of data collection and community outreach and engagement to ensure that 1) those without broadband, a device, and/or digital skills have the

means to meaningfully participate, and 2) the resultant data and analysis accurately reflect the needs of covered populations.

## Resource Spotlight: Needs of Individuals with a Language Barrier and Other Adult Learners

### [Advancing Digital Equity for All: Community-Based Recommendations for Developing Effective Digital Equity Plans to Close the Digital Divide and Enable Technology-Empowered Learning](#)

*U.S. Department of Education's Office of Educational Technology*

Guidance for state leaders on developing plans that meet the needs of learners, their families/caregivers, and communities.

### [Building the Technology Ecosystem for Correctional Education: Brief and Discussion Guide](#)

*U.S. Department of Education's Office of Career, Technical, and Adult Education*

Explores the technical, instructional, and other components necessary for expanding the use of technology in correctional education programs.

### **NTIA's Original Text:**

#### **3.2.2 Broadband Adoption**

*Refer to Section 3.2.2 of the State Digital Equity Plan Guidance.*

*[Identify needs and barriers]*

### **World Education's Comments:**

[NTIA guidance](#) (p. 10) provides a starting list of needs and barriers around broadband adoption for States to identify and detail. Adult education providers are especially well positioned to support States in identifying, collecting data on, and analyzing needs and barriers around *improving digital literacy*.

**NTIA's Original Text:**

**3.2.3 Broadband Affordability**

*Refer to Section 3.2.3 of the State Digital Equity Plan Guidance.*

*[Identify needs and gaps]*

**World Education's Comments:**

[NTIA guidance](#) (p. 11) provides a starting list of needs and barriers around broadband affordability for States to identify and detail. Adult education providers are especially well positioned to support States in identifying, collecting data on, and analyzing needs and barriers around *[increasing] support for enrollment in assistance programs (such as ACP) for low-income consumers.*



## 4 Collaboration and Stakeholder Engagement

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### 4.1 Coordination and Outreach Strategy

Refer to Section 4.1 of the State Digital Equity Plan Guidance.

[Insert state/territory's plan to identify stakeholders and stakeholder groups, develop an inclusive engagement model and associated mechanisms, and facilitate the stakeholder engagement process]

#### Who are considered key stakeholders?

The DEA lists the following as key stakeholders:

- (1) **Community anchor institutions;**
- (2) County and municipal governments;
- (3) **Local educational agencies;**
- (4) Where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;
- (5) **Nonprofit organizations;**
- (6) **Organizations that represent—**
  - (a) Individuals with disabilities, including organizations that represent children with disabilities;
  - (b) Aging Individuals;
  - (c) **Individuals with language barriers**, including 1) Individuals who are English learners; and 2) Individuals who have low levels of literacy;
  - (d) Veterans; and
  - (e) Individuals in that State who are incarcerated in facilities other than Federal correctional facilities;
- (7) Civil rights organizations;
- (8) **Entities that carry out workforce development programs;**
- (9) **Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;**

- (10) Public housing authorities in the State; and
- (11) A partnership between any of the entities described above.

*\* Stakeholders and stakeholder groups relevant to adult education have been bolded for emphasis.*

### **World Education's Comments:**

Most, if not all, adult education providers are considered key stakeholders according to the above definition. For a complete list of AEFLA-funded programs in their states, States should contact their State adult education office. To connect to non-AEFLA programs, States should ask their State adult education office, AEFLA-funded programs, their State library association, and/or their State office of New Americans.

Adult education providers can play critical roles throughout the state planning process, including but not limited to the following:

- Providing expertise on engaging individuals with a language barrier and other covered populations, including regarding the design and implementation of engagement efforts;
- Connecting State DEA planning leads to other key stakeholders;
- Connecting State DEA planning leads to individuals with lived experience;
- Ensuring that the required public comment process is accessible to individuals with a language barrier and other covered populations; and
- Leveraging their learners and community connections for outreach and meaningful, sustained engagement throughout the state planning process, including the public comment process.

Adult education providers can also provide guidance around the considerations of plain language, translation and interpretation, and offline accessibility, as described in 3.2.1.

In addition, because of the nature of WIOA funding, State adult education systems are often well connected to and/or partnered with workforce agencies, labor organizations, and institutions of higher learning – all entities that the State is required to engage in coordination and outreach – as well as other State systems. State adult education systems are also likely to

have experience with collaborating across systems on other state plans, such as the WIOA State Plan.

The *non-exhaustive* list of state and local systems below can serve as a starting point for States to identify, conduct outreach to, and coordinate key stakeholders and covered populations.

### State and Local Systems Serving Covered Populations

Covered Population	State Systems	Local Systems and Providers
<b>Individuals with a language barrier</b>	State adult education systems (WIOA Title II – AEFLA)	Local and/or privately funded adult education providers
	State offices of New Americans or immigrant affairs	Local offices of New Americans or immigrant affairs
	State refugee resettlement systems	Immigrant rights organizations and coalitions
<b>Individuals who live in covered households</b>	Temporary Assistance for Needy Families (TANF) providers	Public housing providers
	Supplemental Nutrition Assistance Program (SNAP) providers, including SNAP Employment and Training providers	Food assistance programs  Fuel assistance programs
<b>Aging individuals</b>	State offices of elder affairs	Area agencies on aging
		Senior centers
<b>Incarcerated individuals, other than individuals who are incarcerated in a</b>	State correctional systems, including AEFLA-funded correctional education programs	

<b>Federal correctional facility</b>		
<b>Veterans</b>	State offices of veterans affairs	Local offices of veterans affairs  Veterans service providers
<b>Individuals with disabilities</b>	State vocational rehabilitation systems (WIOA Title IV – Vocational Rehabilitation Services)  State offices of disability services	Local offices of disability services  Centers for independent living  Disability service providers  Disability rights organizations
<b>Individuals who are members of a racial or ethnic minority group</b>	State adult education systems (WIOA Title II – AEFLA)  State offices of diversity, equity, and inclusion, or minority affairs	Local and/or privately funded adult education providers  Native American Tribes, Alaska Native entities, and Native Hawaiian organizations  Civil rights organizations  Local offices of diversity, equity, and inclusion, or minority affairs  Racial equity/justice organizations and coalitions
<b>Individuals who primarily reside in a rural area</b>	State rural development offices	Local offices of rural affairs  Service providers and other organizations based in rural areas

**NTIA’s Original Text:**

## **5 Implementation**

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### **5.1 Implementation Strategy & Key Activities**

*Refer to Section 5.1 of the State Digital Equity Plan Guidance.*

[Insert strategy and associated activities]

### **World Education’s Comments:**

According to [NTIA guidance](#) (p. 14), a State’s implementation strategy must be *holistic and [address] the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation*. The strategy must also:

- *Establish core activities to achieve the stated goals and objectives;*
- *Incorporate measures to ensure the plan is sustainable and effective across State communities; and*
- *Adopt mechanisms to ensure the plan is regularly evaluated and updated.*

Because of their experience with delivering digital literacy instruction and serving multiple covered populations, adult education providers should be a critical part of the State’s implementation strategy, especially in the areas of digital skills and digital navigation. The field’s rapid response, adaptability, and innovation in the face of the COVID-19 pandemic demonstrates providers’ capability to swiftly develop and implement inventive, responsive services that address learners’ needs and barriers.<sup>9</sup> Additionally, AEFLA-funded providers are especially well positioned to integrate digital literacy instruction into existing adult education services, workforce preparation activities, and civics education, further supporting States in advancing towards their goals in economic and workforce development, education, and civic and social engagement.

World Education strongly recommends allocating implementation funds to adult education providers for at least 1) digital literacy instruction and 2) supporting States with the

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<sup>9</sup> Belzer, Alisa, Tesa Leon, Margaret Patterson, Federico Salas-Isnardi, Jen Vanek, and Corlis Webb. “From Rapid Emergency Response to Scaling and Sustaining Innovation: Adult Foundational Education in the Time of Covid-19.” *New Directions for Adult and Continuing Education* 2022, no. 173-174 (June 2, 2022): 81–91. <https://doi.org/10.1002/ace.20454>.

development, implementation, and evaluation of efforts related to measuring covered populations' digital skills.

**NTIA's Original Text:**

## 5.2 Timeline

*Refer to Section 5.2 of the State Digital Equity Plan Guidance.*

[Insert timeline for plan implementation]

### **What's the expected timeline for implementation?**

A complete Digital Equity Plan will be part of the application for the next round of funding, the State Digital Equity Capacity Grant. The Notice of Funding Opportunity for the Capacity Grant is anticipated to be released in early 2024, and funding from the Capacity Grant will support States in implementing their Digital Equity Plan for five years.

**NTIA's Original Text:**

## 6 Conclusion

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*Refer to Section 6.1 of the State Digital Equity Plan Guidance.*

[Insert Text]

## 7 Appendices

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[Add appendices as needed]

## Further Resources

World Education hosts [a page of resources on digital equity and inclusion](#) as part of the Transforming Immigrant Digital Equity (TIDE) project. This page is regularly updated and includes the following:

- Official and field guidance for State Digital Equity Planning
- Promising digital inclusion models and resources
- Digital equity and inclusion data sources
- State and local digital equity plans and guides

*This guidance was produced as part of [Transforming Immigrant Digital Equity \(TIDE\)](#), a project of World Education. TIDE aims to serve adult immigrant and refugee English language learners equitably and holistically by educating and engaging service providers, policy makers, institutional decision-makers, and advocates in re-envisioning adult education, digital equity, and immigration at the national, state, and local levels.*



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