

**INTERNET
FOR ALL**

Digital Equity Guide for the States

How to Prepare for
Success in Your State



**National Telecommunications and
Information Administration**

Table of Contents

Introduction	3	How to Execute: State Best Practices ...	18
Digital Equity 101	5	Lead with and Operationalize Equity.....	21
The Digital Equity Act (DEA)	9	Weave Digital Equity through Existing and Forthcoming Deployment Efforts.....	23
Background & Overview	9	Appendices	32
State Digital Equity Planning & Capacity Grant Program Basics.....	10	Appendix A: Best Practices across States.....	32
Best Practices for Preparing	13	Appendix B: Definitions.....	33
Identify a Lead & Staff the Effort.....	13	Appendix C: The Digital Equity Act - State Plan Section	34
Staff Well - Digital Equity Office (DEO) Structure.....	13	Appendix D: Covered Populations.....	35
Define DEO Role and Goals	16	Appendix E: Broadband Equity, Access, and Deployment Program Planning Requirements	36
Create a Plan for the Plan	16	Appendix F: Examples of Local & Regional Digital Equity/Inclusion Plans	38
		Appendix G: Resources and Support.....	39

Introduction

To achieve digital equity, deploying broadband to every household in the United States — even with scalable, future-proof technologies — will not be enough, nor will a federal subsidy designed to make the Internet more affordable for low-income households. Instead, robust, comprehensive programs that address the human side of the issue, and the technology must be designed and implemented across the country to create systems that work for everyone, where everyone has access to the technologies, skills, and opportunities necessary to thrive.

Achieving **digital equity** in the United States would mean that all the nation's individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy. Digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services.

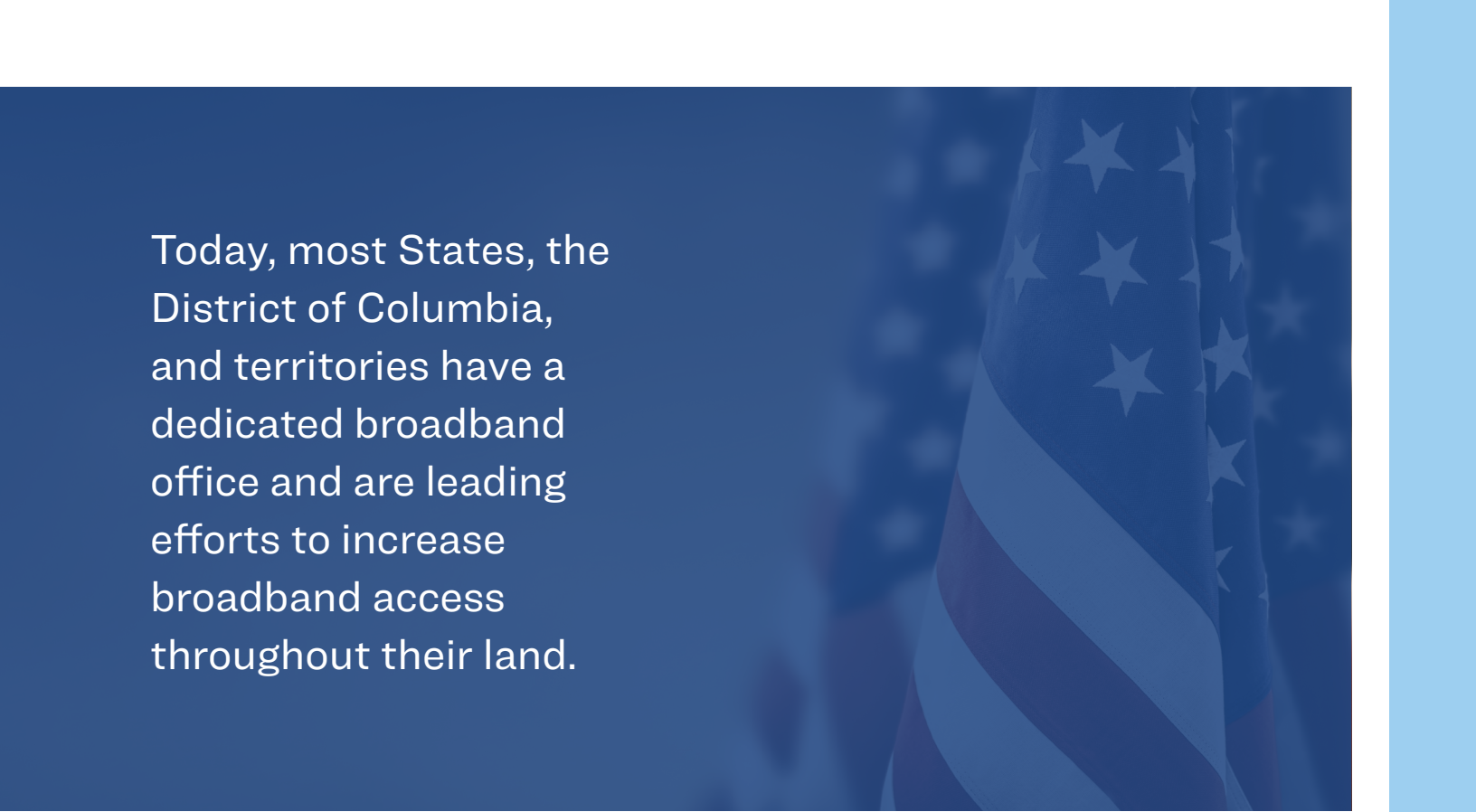
Congress allocated the most significant investment in digital equity and broadband in US history — \$65 billion — through the Infrastructure Investment and Jobs Act, also known as Bipartisan Infrastructure Law (BIL). This investment should develop and implement systemic solutions if implemented with the understanding that digital equity is a long-term challenge. The bulk of the BIL broadband funds — including those allocated through the **Digital Equity Act** (DEA) — identify States and territories as key actors in closing the digital divide.¹ As such, States will manage much of the funding allocated through the BIL and the

various COVID recovery acts. States are uniquely positioned to lead cross-sector, cross-departmental, multifaceted digital inclusion activities that drive impact. A State's knowledge, coordination, and convening abilities and expertise, combined with its relationships with local governments and residents, make it a logical leader in promoting and expanding digital equity.

This guide includes the basics of digital equity, an overview of the DEA — recommendations for preparing for the planning requirements, recommendations for weaving digital equity throughout all State-led broadband activities, and ideas and best practices from other States with digital inclusion activities underway or in process. Where possible, templates and tools are included to simplify the pre-planning process for States.

States can now undertake simple, tactical steps to prepare for future planning and eventual implementation of digital equity strategies. This guide provides practical support to States as they begin that process, and over the coming months and years, NTIA will continue to provide more support and resources for States as they implement the DEA programs.

¹ For brevity, this document uses States to refer to both States and territories

A large, stylized graphic of the American flag, rendered in shades of blue and white, occupies the top half of the page. The stars and stripes are visible but slightly blurred, creating a textured, patriotic background.

Today, most States, the District of Columbia, and territories have a dedicated broadband office and are leading efforts to increase broadband access throughout their land.

However, few have had the resources, capacity, or political support to develop a robust digital equity strategy. Nevertheless, broadband access and digital inclusion are inextricably linked and mutually reinforcing. Thus, State broadband offices are natural homes for State-led digital inclusion work. BIL provides States the opportunity to step back and thoughtfully design a Statewide digital equity strategy to meet the unique needs of each State's residents holistically, leverage the State's assets, and identify innovative and creative solutions to achieve digital equity within the State.

States are also currently managing and disbursing their State-allocated funds and federal funds from several different grant programs like the

Capital Project Funds (CPF), State and Local Fiscal Recovery Funds (SLFRF), and the Broadband Equity, Access, and Deployment (BEAD).

The **State Digital Equity Planning Grant** (SDEPG) NOFO was released on May 13th, 2022, and all fifty States, the District of Columbia and Puerto Rico submitted their applications by the deadline. In addition, the four eligible territories and hundreds of Tribal Nations have also submitted Letters of Intent to participate in the State Digital Equity Planning Grant program. Tribal entities can also apply for subgrants through their State or territory's digital equity program. This guide is a tool to help States prepare for the forthcoming planning opportunity the DEA provides.

Digital Equity 101

Since its inception, the Internet has had the potential to be the great equalizer of our time. Thanks to the Internet, at no other time in history, has it been easier to start a business from home, communicate with loved ones across oceans and time zones, work and learn remotely, receive healthcare services even if you live hours from a medical provider, and engage in any other of the thousands of opportunities the Internet brings into a person's home. Yet, unfortunately, too many U.S. residents continue to be disconnected from the Internet and the opportunities it provides access to and arguably has accentuated disparities where they exist.

The COVID-19 pandemic crystallized the consequences of how disconnection negatively impacts individuals' lives. Everyone deserves a right to reliable, affordable, high-speed Internet. However, persistent disparities exist in the United States regarding who has reliable and affordable broadband access, how they access it, and their abilities to

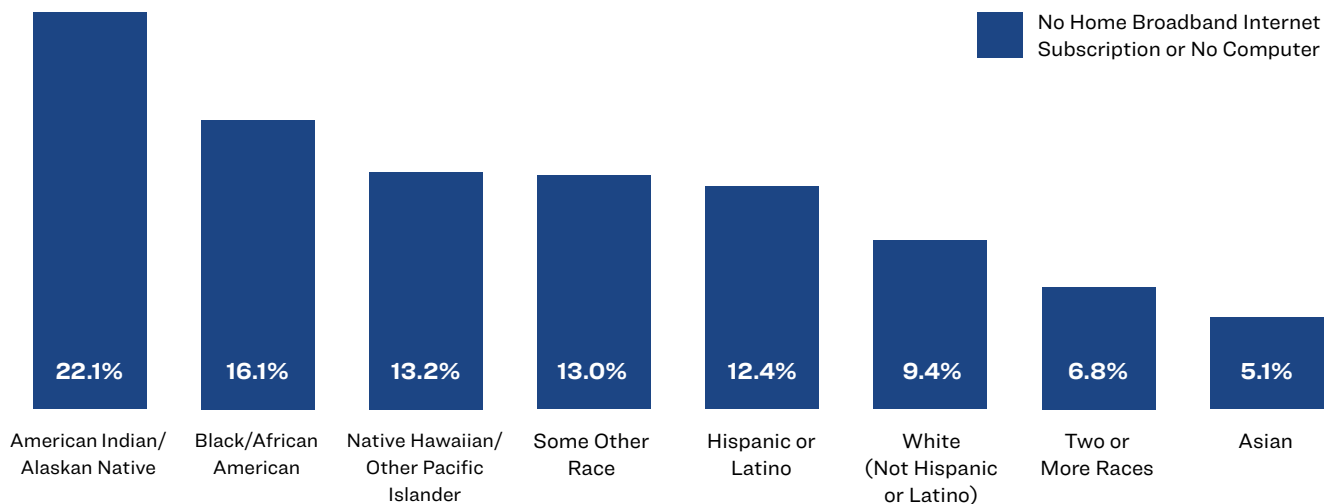
benefit from it. When thinking about broadband access, there are two distinct elements to consider:

- **Broadband availability** - Broadband availability refers to the ability of a household to subscribe to broadband service at a speed, quality, and capacity needed to accomplish everyday online tasks.
- **Broadband adoption** - Broadband adoption refers to a household's
 - active subscription to broadband service at a speed, quality, and capacity needed to accomplish every day and critical online tasks,
 - possession of the digital skills necessary to accomplish such tasks and,
 - ability to do so on a personal device and secure convenient network.²

² Rhinesmith, Colin, Digital Inclusion and Meaningful Broadband Adoption Initiatives, Benton Foundation, January 2016, at 8, [link](#).

Figure 1

Broadband & Computer Access by Race and Ethnicity % of Households³



³ 1-Year American Community Survey, U.S. Census Bureau, Presence of a Computer and Type of Internet Subscription in House-hold by race and ethnicity [Tables B28009A-H] (2019), [link](#).

The groups most affected by the digital divide are many of the same that were most severely impacted by the pandemic and have consistently experienced social inequities over time.

According to the American Community Survey (ACS), 14.5 million households — 12 percent of all households in the country — had Internet access only through a cellular data plan, and 16.7 million households (14 percent of all households) had no home broadband subscriptions of any kind in 2019, including a cellular data plan.⁴ However, low-income households, older adults, and certain racial and ethnic groups lack broadband and computer access at higher rates than the general population.

Among low-income households (making less than \$35,000 per year), 30 percent lack a home Internet subscription.¹

4 1-Year American Community Survey, U.S. Census Bureau, Household Income in the Last 12 Months (In 2020 Inflation-Adjusted Dollars) by Presence and Type of Internet Subscription in Household [Table B28004] (2019), [link](#).

Among persons 65 years of age and older, 22 percent lack broadband or a computer in their household.⁵

Efforts to bridge the digital divide and work toward digital equity began in the early- to mid-1990s, primarily as grassroots efforts focused on improving digital skills through class training and public computer labs. In the 2000s community-based organizations and anchor institutions began investing in and creating what is now called digital equity programs, focused on addressing one or more of the five elements of digital inclusion:

1. Affordable, robust broadband Internet service
2. Internet-enabled devices that meet the needs of the user
3. Access to digital literacy training
4. Quality technical support
5. Applications and online content are designed to enable and encourage self-sufficiency, participation, and collaboration

5 1-Year American Community Survey, U.S. Census Bureau, Age by Presence and Type of Internet Subscription in Household [Table B28005] (2019), [link](#).

Figure 2

Data from the ACS Survey



12% of all households had a cellular data plan only



16.7 million households (14%) had no home broadband subscription

Definition

Digital Inclusion

Refers to the activities necessary to ensure that all individuals and communities, including the most disadvantaged, have access to and use of information and Communication Technologies.

- Affordable, robust broadband
- Internet service
- Internet-enabled devices that meet the needs of the user
- Access to digital literacy training
- Quality technical support
- Applications and online content are designed to enable and encourage self-sufficiency, participation, and collaboration

Digital Inclusion must evolve as technology advances. Digital Inclusion requires intentional strategies and investments to reduce and eliminate historical, institutional, and structural barriers to access and use technology.

At its core, digital equity work requires trust to succeed. The community members who would benefit most from support services often experience disenfranchisement and have seen their communities and neighbors overlooked by institutions. An inherent distrust of technology, borne from a lack of confidence or past negative experiences, can make people hesitant to engage with online resources. Moreover, logistically, those lacking broadband access are inherently harder to reach as outreach tools are increasingly digital.

For these reasons, trusted community-based organizations are fundamental to developing impactful digital inclusion programs. They have known entities with existing relationships and a history of providing services to the community, and digital inclusion programs are often a logical extension of their work. The types of organizations that develop digital inclusion programs can vary greatly depending on the character and needs of the community. However, some of the most common include small community-based organizations, libraries, public housing authorities, local governments, senior centers, schools and academic institutions, faith-based organizations, and social service organizations.

As the U.S. continues on the path toward digital equity, individuals will experience real, tangible outcomes. They'll enjoy improved and remote education for lifelong learning, more options to receive care to stay healthy, and expanded job opportunities. More job opportunities, which leads to meaningful employment, is the key that will continue to unlock other opportunities for this generation and the next.

The availability of broadband, along with the digital skills to take advantage of it, opens the door for all individuals to be active, productive members of the workforce. With access to high-speed Internet, they can search for open job postings and do online research to help them get the job. With digital literacy, they can thrive in those jobs and help advance themselves and their families economically, as well as the country as whole. By investing in digital equity efforts, the U.S. is investing in a 21st century workforce – one that leads to real outcomes of families enjoying richer, fuller and healthier lives.

As the importance of digital inclusion work has gained awareness (and funding), and as more organizations establish digital inclusion programs and services, the need for collaboration at the local and State levels has become apparent. The first community-wide digital inclusion coalitions formed about ten years ago in Philadelphia, Kansas City, and Portland, followed by a few others shortly after that. In these communities, and in many more since, anchor institutions, direct service providers, local governments, and other key partners recognized a growing but disconnected network of organizations and programs working to meet the digital inclusion needs of underserved residents. Intending to coordinate efforts and form a complete **digital equity ecosystem**, they began convening and eventually formalized as digital inclusion coalitions.

The coalition model has proven to be a particularly effective way to organize digital inclusion efforts across communities. Based on a recent survey the National Digital Inclusion Alliance (NDIA) conducted in the field, there are now more than 50 digital inclusion coalitions across the country. For more information on the strengths, organizing principles, and effective strategies for establishing and sustaining digital inclusion coalitions, refer to [NDIA's Digital Inclusion Coalition Guidebook](#).⁶

The last and only major federal funds dedicated to broadband adoption and digital inclusion efforts were through the **Broadband Technology and Opportunities Program (BTOP)**⁷, established under the **American Recovery and Reinvestment Act (ARRA)**⁸, which invested approximately \$4 billion in broadband adoption projects across the country. However, many of these projects funded by this program sunset with the program in 2015.

In **2019**⁹, many States began broadband deployment programs to extend service in rural and unserved areas, but digital inclusion activities remained largely unfunded. Local governments, like the city of Seattle in 1996, began investing personnel and funds towards what were then called community technology programs.¹⁰ In the past decade, more cities began dedicating personnel to the issue to lead initiatives, coalitions, and interdepartmental work.

6 NDIA, Digital Inclusion Coalition Guidebook, Version 2022 (2022), [link](#).

7 NTIA, Broadband Technology Opportunities Program, [link](#).

8 American Recovery and Reinvestment Act of 2009, 111 P.L. 5, 123 Stat. 115, [link](#).

9 The Pew Charitable Trusts, How States Are Expanding Broadband Access: New research identifies tactics for connecting unserved communities(2020), [link](#).

10 Seattle Information Technology, Digital Equity (2022), [link](#).

However, digital inclusion programs have generally relied on bootstrapped means of obtaining funding for their work. Despite these and other impactful efforts in recent years, a 2021 study by the Pew Research Center found that, while some gains have been made, gaps in digital equity remain stubbornly persistent according to factors of income¹¹, race¹², age¹³, and disability status.¹⁴ As such, the infusion of funds to the field through the various COVID relief acts and the BIL, including the DEA, are meaningful steps towards creating the systems necessary to achieve digital equity.

11 Vogels, Emily A., Digital divide persists even as Americans with lower incomes make gains in tech adoption, Pew Research Center (2022), [link](#).

12 Atske, Sara. and Andrew Perrin. Home broadband adoption, computer ownership vary by race, ethnicity in the U.S., Pew Research Center (2021), [link](#).

13 Faverio, Michelle, Share of those 65 and older who are tech users has grown in the past decade, Pew Research Center (2022), [link](#).

14 Perrin, Andrew and Sara Atske, Americans with disabilities less likely than those without to own some digital devices, Pew Research Center (2021), [link](#).

Definition

Digital Equity Ecosystem

A digital equity ecosystem is a combination of programs and policies that meet a geographic community's unique and diverse needs. Coordinating entities work together in an ecosystem to address all aspects of digital divide, including affordable broadband, devices, and skills. Indicators of a strong digital equity ecosystem:

- Existence of programs and policies addressing all aspects of the digital divide
- Affordable and subsidized broadband service options programs that meet the community's needs
- Affordable and subsidized device ownership programs that meet the community's needs
- Multilingual digital literacy and digital skill trainings that meet the community's needs
- Hardware and software technical support
- Digital navigation services to guide residents to the above services
- Collaboration: Entities providing local digital inclusion services, policymakers, advocates, social service providers, and community leaders co-create solutions in partnership with the community services

The Digital Equity Act (DEA)

Background & Overview

The DEA provides a powerful opportunity for States to step back and thoughtfully design a Statewide digital equity strategy to meet the unique needs of State residents holistically, leverage State assets, and identify innovative and creative solutions to achieve digital equity.

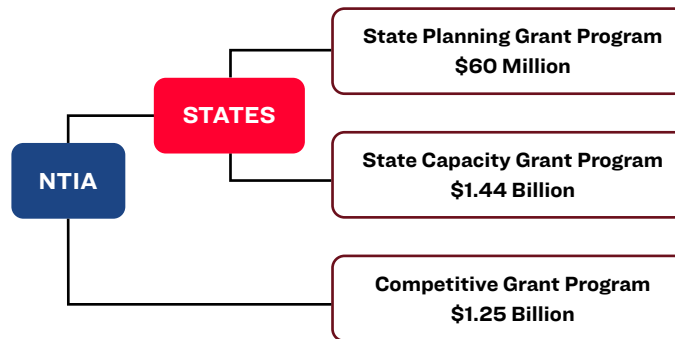
First introduced by U.S. Senator Patty Murray of the State of Washington in 2019, the DEA was reintroduced in 2021 with bipartisan support from Senators Rob Portman of Ohio and Angus King of Maine. It was then included in the broadband section of the BIL, allocated \$2.75 billion, and signed into law by President Joe Biden on November 15, 2021.

The DEA creates two programs (broken into three grants) housed at NTIA — the **State Digital Equity Capacity Grant Program** and the **Digital Equity Competitive Grant Program**.

- **State Digital Equity Planning Grant Program:** \$60 million formula grant program for States and territories to develop digital equity plans
- **State Digital Equity Capacity Grant Program:** \$1.44 billion formula grant program for States and territories distributed via annual grant programs over five years to implement digital equity projects and support the implementation of digital equity plans
- **Digital Equity Competitive Grant Program:** \$1.25 billion discretionary grant program distributed annually over five years to implement digital equity projects. Eligible applicants generally include a political subdivision, agency, or instrumentality of a State; tribal governments; nonprofit entities; community anchor institutions; local educational agencies; and entities that carry out workforce development programs.

Figure 3

Federal and State Led Funding Allocations



As outlined above, the State Digital Equity Capacity Grant Program contains two types of grants: (1) planning and (2) capacity. The State Digital Equity Planning Grant Program provides funding for States to develop digital equity plans, which are required to be eligible for the capacity grants. Capacity grants are what they sound like — designed to provide States with the necessary support and capacity to fund the States’ digital inclusion priorities, strategies, and initiatives. The NOFO published on May 13, 2022, provides guidance for the State Digital Equity Planning Program grants, and the NOFOs for the Capacity Grant program and the Competitive Grant Program are forthcoming.

Building a Statewide digital equity plan is like building a State broadband plan or economic development plan. The primary difference is that a digital equity plan specifically and holistically addresses the digital divide and identifies strategies to close it. However, to date, no State has developed a Statewide plan with a singular focus on achieving digital equity, except for California, whose “Broadband for All” plan interweaves broadband access and digital equity goals.¹⁵ North Carolina has hired a Digital Equity Director in 2021.¹⁶ While lessons and best practices can be drawn from communities across the country that have created local digital inclusion plans, local plans cannot fully inform States, given that States’ roles and responsibilities differ from that of local governments or community-based organizations.

¹⁵ California Broadband Council, Broadband Action Plan 2020: California Broadband for All, 2020, [link](#).

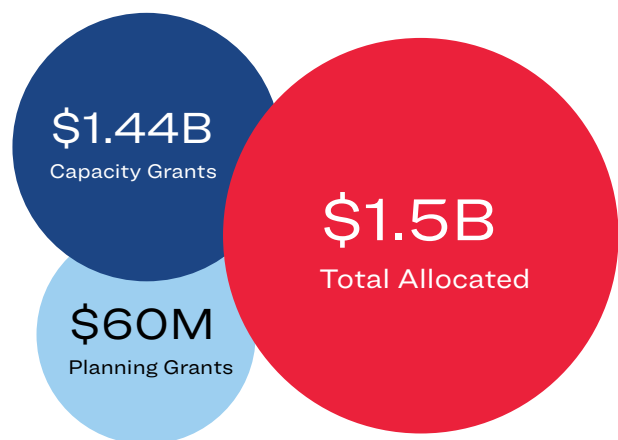
¹⁶ North Carolina Department of Information Technology, Governor Cooper Establishes Nation’s First Office of Digital Equity and Literacy (2021), [link](#).

The United States is diverse and so too is the diversity of its States, which lends itself to each functioning as its laboratory of democracy. Each State’s character and attributes differ, and how the digital divide manifests will reflect that diversity. In turn, each State’s goals, and strategies for achieving digital equity will necessarily differ. Missouri’s path to digital equity will be much different from Pennsylvania’s or its neighbor, Kansas. As such, each State’s plan may be slightly or drastically different.

State Digital Equity Planning & Capacity Grant Program Basic

Figure 4

Funding Allocations



Total Allocated: \$1.5 billion
(\$60 million planning grants + \$1.44 billion capacity grants)

Program Administrator: National Telecommunications and Information Administration (NTIA)

Figure 5

Federal Timeline & Important Dates



November 15, 2021

BIL passed with DEA included



February 4, 2022

Request for Comment (RFC) Period Closed



May 13, 2022

State Digital Equity Planning Grant Program Notice of Funding Opportunity (NOFO) Released



July 12, 2022

Applications for the State Digital Equity Planning Grant Program due to NTIA



Fall 2023

Digital equity plans due to NTIA



TBD

Request for Comments for State Digital Equity Capacity Grant Program and Digital Equity Competitive Grant Program



TBD

State Digital Equity Capacity Grant Program NOFO



TBD

Digital Equity Competitive Grant Program NOFO



Federal Action



State Action

Eligible Administering Entities¹⁷

- The State, or a political subdivision, agency, or instrumentality of the State;
- An Indian Tribe, an Alaska Native entity, or a Native Hawaiian organization located in the State;
- A foundation, corporation, institution, association, or coalition that is — (1) a not-for-profit entity, (2) providing services in the State; and (3), not a school
- A community anchor institution, other than a school, that is located in the State
- A local educational agency that is located in the State
- An entity located in the State that carries out a workforce development program
- An agency of the State that is responsible for administering or supervising adult education and literacy activities in the State
- A public or multi-family housing authority that is located in the State
- A partnership between any of the previously listed entities

Eligible Subgrantees¹⁸

- A community anchor institution
- County and municipal governments
- Local education agencies
- Indian Tribes, Alaska Native entities, or Native Hawaiian organizations
- Nonprofit organizations
- Organizations that represent:
 - Individuals with disabilities, including organizations that represent children with disabilities;
 - Aging Individuals;
 - Individuals with language barriers, including:
 - Individuals who are English learners; and
 - Individuals who have low levels of literacy;
 - Veterans; and
 - Individuals in the State who are incarcerated in facilities other than Federal correctional facilities

¹⁷ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1723(b)(2) (2021). [link](#).

¹⁸ *Id.* at. § 1723(c)(1)(D) (2021).

- Civil rights organizations
- Entities that carry out workforce development programs
- Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State
- Public housing authorities in the State; and
- A partnership between any of the entities described above.

Covered Populations¹⁹

The DEA instructs States to understand the current State of the digital divide among key unserved or underserved populations and then to outline how the State will address those gaps with digital equity programming. The term “covered household” means a household whose income for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census. The NOFO and the BIL define the following as covered populations:

- Individuals who live in covered households;
- Aging individuals;
- Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
- Veterans;
- Individuals with disabilities;
- Individuals with a language barrier, including individuals who:
 - Are English learners; and
 - Have low levels of literacy;
- Individuals who are members of a racial or ethnic minority group; and
- Individuals who primarily reside in a rural area.

¹⁹ Id. at § 1721(8) (2021).

Plan Requirements as Required by the BIL and NOFO²⁰

- Identification of barriers to digital equity for covered populations in the State
- Measurable objectives for documenting and promoting among each Covered Population located in that State:
 - The availability of, and affordability of access to, fixed and wireless broadband technology;
 - The online accessibility and inclusivity of public resources and services;
 - Digital literacy;
 - Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and
 - The availability and affordability of consumer devices and technical support for those devices.
- An assessment of how the measurable objectives will impact and interact with the State’s:
 - Economic and workforce development goals, plans, and outcomes;
 - Educational outcomes;
 - Health outcomes;
 - Civic and social engagement; and
 - Delivery of other essential services.
- Description of State’s plan to collaborate with key stakeholders
- List of organizations the State collaborated with on developing the plan

²⁰ Id. at § 1723(c)(1) (2021).

Best Practices for Preparing a State Digital Equity Plan

Identify a Lead & Staff the Effort

The DEA requires governors (or an equivalent official) to select an “administering entity for the State” to be the primary planning grant recipient and administrator.²¹ That entity will be responsible for developing, implementing, and overseeing the digital equity plan for the State.²²

Functionally, the administering entity will become the de-facto home and lead all State-led digital inclusion activities for the next five (or more) years. As such, governors must select the administering agency best suited to both create the digital equity plan and implement it. While States have differing models for where to house digital inclusion efforts, centralizing digital inclusion efforts within or adjacent to existing broadband efforts will provide easier alignment with **Broadband Equity, Access, and Deployment (BEAD)** program implementation. Such an approach makes it more likely that a State can develop and implement a streamlined, holistic, and efficient digital equity and inclusion strategy that bridges the gap between infrastructure, deployment, and adoption. Finally, the governor should duly empower the entity with the necessary planning, policymaking, procurement, and community engagement powers to deliver its digital inclusion goals effectively.

Should the governor appoint an entity other than the broadband office as the administering entity, a Digital Equity Office (DEO) or team could still be created, with a relationship to the broadband office to aid in coordination and lead the affordability work the broadband office will undertake to implement the BEAD program. The DEA NOFO requires the DEA administering entity to coordinate with the broadband office formally and actively throughout the life of the BIL programs.

²¹ Id. at § 1723(b)(1) (2021).

²² Id. at § 1723(b)(1)(B) (2021).

Once identified, the administering entity should focus on ensuring a State has the internal capabilities and expertise to lead digital inclusion efforts. Many States and territories now have established broadband offices. However, only a few of these offices have dedicated staff to lead digital inclusion initiatives. To apply for DEA funds, States will be required to develop goals, objectives, and strategies for achieving digital equity. Most do not currently have the in-house expertise to do so. Thus, it will be necessary to hire new staff or dedicate a current staff member’s time to digital inclusion.

Staffing the digital inclusion effort could create a set of positions, a new team, or an entirely new office. If a State has the opportunity to fill positions and create jobs, it should do so by hiring locally, providing equitable opportunities among historically underrepresented communities, and offering training where applicable. See more details about developing a workforce equitably on [page 22](#).

Staff Well - Digital Equity Office (DEO) Structure

The State Digital Equity Planning funds can be used to fund positions to lead the planning work in a State. Exact staffing will inevitably vary across DEOs, especially because different States have established digital equity functions at different paces and have had access to unique internal resources and partnerships. **Louisiana**, for example, is focusing its DEO hiring on digital inclusion specialists with research, data analysis, and program development skills.

Whereas the State of New York’s Director of Digital Equity **job posting** explicitly lists leading the DEA planning process as one of the role’s key functions. Regardless of the skills and functions identified as necessary and the staffing path, dedicating a minimum of one FTE to digital inclusion work will provide needed support and leadership for the program and its implementation. This allows the State to develop digital equity subject matter expertise and provides a clear digital equity point of contact for stakeholders, among other benefits.

In general, DEO organizational structure will be informed by the generally accepted approaches to hiring and organization within the State, available funding and hiring capacity, and time spent building broadband and digital equity functions to date, which is not a judgment on the State’s effectiveness but a function of time, political will, and other factors. Below are three different approaches to DEO organization, with examples in [Appendix A](#).

**ORGANIZATION STRUCTURE 1:
The Beginner (1-3 FTEs)**

For many States, the process of designing, building, and staffing a broadband and DEO organization is in its infancy (0-3 years old). The organizational structure is lean and focused.

**ORGANIZATION STRUCTURE 2:
The Tried and Tested (3-6 FTEs)**

Some States, such as **North Carolina** and **Washington** have spent a more extended period of time (3-5 years) building out mature broadband and DEO organizations (either unified or co-existing). These States have typically received buy-in from their governor and legislature, already developed a five-year broadband plan with clear digital equity priorities, and have launched and managed digital equity programs over several years.

Figure 6
**ORGANIZATION STRUCTURE 1:
The Beginner
(1-3 FTEs)**

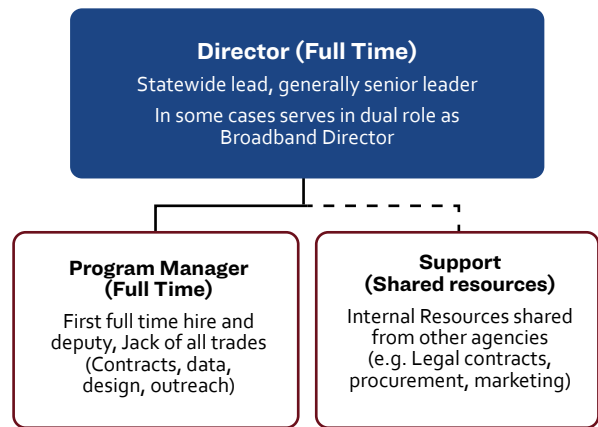
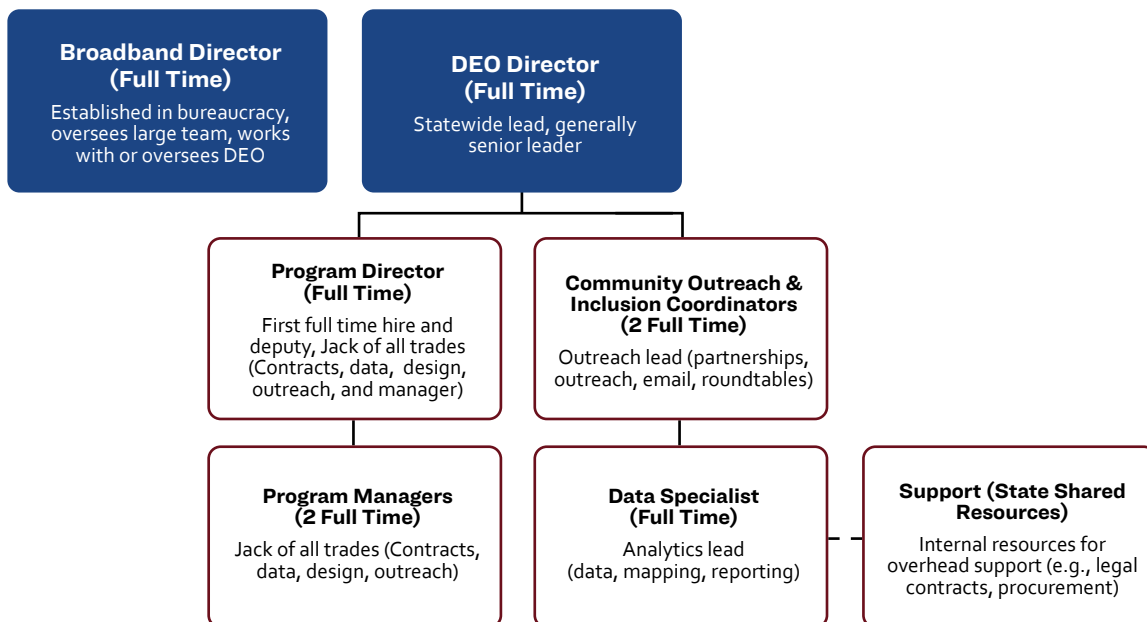


Figure 7
**ORGANIZATION STRUCTURE 2:
The Tried & Tested (3-6 FTEs)**



**ORGANIZATION STRUCTURE 3:
The Veteran (7+ FTEs)**

Eventually, States with sophisticated DEO offices, such as Wisconsin’s Public Utilities Commission, will have strong alignment with information technology, broadband, and other sister agencies.

These offices will then be at a stage where they manage different digital equity programming, serve key populations (e.g., affordable housing residents, schools, veterans), and invest in internal capacity for specialized functions (e.g., communications, contracts, legal, analytics).



Figure 8

**ORGANIZATION STRUCTURE 3:
The Veteran (7+ FTEs)**



Define DEO Role and Goals

Once staffed, the DEO's role, goals, and responsibilities can be defined.

In addition to leading the digital equity planning process, the State DEO (or lead's) roles and responsibilities could include:

- Leading the coordination of digital inclusion activities on behalf of the State
- Assisting in the development of digital equity policy
- Coordinating and distributing funding
- Strengthening local digital equity ecosystems
- Educating policymakers, local governments, and stakeholders on digital equity and inclusion
- Guiding digital equity-focused data collection, research, and analysis
- Creating, piloting, and scaling digital inclusion programs

Create a Plan for the Plan

Once the grant funds are received, the DEA administering entity will have twelve months to create the State digital equity plan. Creating a project plan can help launch the formal planning process. A project plan identifies who will be responsible for each portion of the process along a timeline. Strong project plans prioritize tasks that inform the development of the digital equity plan and could potentially be reused in the digital equity plan itself (e.g., data collection and analysis).

The Sample Timeline below provides a rough sketch of a project plan. Additional details, target dates, and assignments will support the plan's development.

Figure 9

Sample Timeline





Sample Timeline

2022 Spring

Build State capabilities and engage local communities

- Build State capabilities, including identifying State digital equity lead and associated staff needs
- Complete initial data analysis of State digital equity gaps, possibly defining a need for a survey
- Preview digital equity gaps with executive leadership and legislature
- Develop sample job descriptions for necessary DEO positions and ideal staging for hiring (e.g., priority A, B, and C)
- Meet with and listen to priorities from stakeholders
- Solicit informal comments, local digital inclusion plans, information about ongoing State broadband deployment projects and digital inclusion programs, suggestions, and other input from stakeholders

2022 Summer

Submit DEA State Planning application and identify data gaps

- Launch and empower State DEO (if resources are available)
- Solicit input from stakeholders on the project plan
- Identify data collection gaps and develop a strategy for filling them over time
- Assemble core planning team and convene to establish expectations
- Finalize and submit DEA State Planning application to NTIA
- Develop a communications plan

2022 Fall — Winter

Begin Planning

- Prepare follow-up application materials and responses to NTIA, if requested
- Continue launch and empowerment of State DEO (if resources available)

- Begin regular convening of the core planning team
- Develop stakeholder coordination, outreach, and engagement plan, including intended communication and education opportunities
- Develop rigorous, but not onerous, data collection and reporting, including regular (e.g., quarterly) updates to stakeholders, the community, and local government
- Prepare internal agencies, contracting and procurement officers, and grant administrators for efficient acquisition of external planning support, if necessary
- Obtain external support, if needed
- Identify and purchase any software necessary for the plan's development (i.e., survey tools, project management tools, etc.)
- Launch the planning process once funds are received

2023 Spring — Summer

Execute outreach and engagement plan for community-based organizations (CBOs) and partners

- Regularly convene core planning team to provide updates and drive the planning process
- Implement communication, education, and outreach models for interested stakeholders
- Implement a data collection strategy

2023 Fall

Finalize full DEA plan and prepare for implementation

- Finalize data collection
- Write plan
- Publicly post plan for a minimum of 30 days for public comment (required by statute)
- Incorporate “worthwhile” comments into the plan
- Submit the plan to NTIA, send to stakeholders, and publish for the public
- Prepare for the plan's implementation

How to Execute: State Best Practices

This section provides best practices gathered from peers, including Louisiana, Rhode Island, Washington, Nebraska, Wisconsin, North Carolina, and Hawaii — to better understand different digital equity strategies that States have already engaged in and help States leverage their DEA planning funds.

Lead with and Operationalize Equity

Digital equity will not be achieved in any State if equity is an afterthought or a “lens” that is put on for the digital equity planning and implementation process alone. Instead, leading with equity, operationalizing it in an office’s daily work, and weaving it throughout all broadband programs — including the deployment programs — is essential. While there are many ways to lead with and operationalize equity, the following are some practical recommendations.



We intentionally avoid the language ‘equity lens’ because a lens can be taken off.

Equity should be a forever understanding.

— Ernie Rasmussen, Digital Equity Manager
Washington State Broadband Office
Washington Department of Commerce



Be Intentional with Language and the Details

The language you use to communicate with stakeholders throughout the DEA planning process matters. If the office is “leading with equity” but uses phrases like, “now, let us put on our equity lens,” those you interact with may believe that equity is optional and only thought of intermittently.

Similarly, being thoughtful and intentional about the details of the planning process matters in terms of signaling the value that DEO places on equity. For instance, if hosting a listening session for both the DEA plan and the BEAD plan but your agency leadership only attend the BEAD session, it signals to stakeholders that BEAD is a priority for leadership whereas DEA is not.

Additionally, intentionally planning stakeholder outreach to provide opportunities for as many disconnected households as possible by selecting dates and times where a diversity of households can engage, and ensuring invitations to the stakeholder outreach events reach the disconnected, will lead to more equitable engagement and a more holistic plan. Things to consider for in-person meetings would be providing childcare, ensuring meeting locations are easily accessible from public transit or have ample parking, and providing travel vouchers or mass transit tickets for participants.

Center the Voices of Covered Populations and Historically Disconnected Communities

Throughout the planning, development, and implementation of the plan, intentionally identifying, amplifying, and centering the voices of those most affected by the digital divide, the covered populations, and the disconnected communities will provide for a more prosperous and more equitable planning process and plan.

One strategy several digital inclusion coalitions and organizations have begun incorporating into their community-based coalition work, and digital inclusion work is to financially compensate the residents for their participation. Lived experts are members of covered populations, particularly individuals from

historically disconnected communities with direct, lived experience of being disconnected. For example, the [Franklin County Digital Equity Coalition](#) has compensated lived experts for their participation as research team members to better understand the ramifications of different aspects of the digital divide in their communities.

Another digital inclusion coalition plans to provide lived experts with \$5,000 for a 10-month commitment to participate in the coalition work as a subcommittee co-chair. The co-chair would commit to attending 80 percent of the subcommittee meetings, lead subcommittee meetings, and actively engage with the subcommittee’s work during that time. The entity could invite lived experts to join the core planning team and other stakeholder touch points throughout the planning process.

Including lived experts in the planning process provides a viewpoint and expertise to the team that cannot otherwise be obtained. In addition, the practice is radically humanizing and would enable the State to demonstrate respect for the residents.

Content Simplicity and Translation

Another simple but important way to operationalize equity is to ensure all content the DEO publishes is comprehensible and translated into the State’s predominant languages. Translating all materials developed throughout the planning process, including but not limited to public notices, surveys, flyers, and informational pamphlets, into simple, easy-to-understand wording and the State’s predominant languages will engage a wider pool of residents throughout the State. Additionally, we recommend translating and publishing materials into formats easily accessible for people with limited vision and those who are deaf or hard of hearing.

Use a Holistic Data Collection Approach

Beginning the data collection process before or during the planning process, utilizing a holistic approach to data collection to quantify the gaps in connectivity and digital equity, is another way to operationalize equity. **Research by NDIA** and other organizations has revealed that sizable gaps in connectivity are driven by and highly correlated with race and socioeconomic status, not just geography.

North Carolina's Broadband Indices are an example of both a robust, holistic data collection and visualization approach by breaking down the specific challenges individual counties and census tracts face to better identify investment and programmatic opportunities. The Broadband Infrastructure Office partnered with Dr. Roberto Gallardo of Purdue University to create two indices comprising 19 variables that holistically break down the State's digital divide. The Broadband Infrastructure Office notes that the indices are helpful because they help demonstrate need at the county and census tract level, identify the most beneficial types of investment, and determine where resources should be deployed.

Similarly, data that only account for the availability of broadband infrastructure will result in an inaccurate assessment of the digital divide. Consider the factors driving limited adoption, including digital skills, device access, complicated signup processes for discounted Internet service, expensive pricing, and poor speeds. This approach may require both quantitative and qualitative data collection methods. Qualitative methodologies, such as surveys, interviews, and focus groups, are time-consuming but can provide a richer understanding of lived experiences and unique barriers to accessing the digital world different demographics may encounter. CBOs and Community Anchor Institutions (CAIs) can also support qualitative data collection, but it is important to remember their resource and time constraints and avoid overly burdening them in this process.

Finally, even though data can be limited, use all available tools to quantify and contextualize the existing gaps, including canvassing surveys in high-traffic public places and social service offices, and gathering rich experiential, anecdotal data via one-on-one conversations, focus groups, and existing community meetings.

Weave Digital Equity through Existing and Forthcoming Deployment Efforts

While the Digital Equity Act is a landmark piece of legislation, and \$2.75 billion will provide much-needed support for the launch and operation of numerous digital inclusion programs and activities, the funding is a one-time investment over five years. Achieving digital equity will require more comprehensive and sustainable funding sources. However, intentionally weaving digital equity throughout all broadband programs and efforts instead of operating digital inclusion programs in silos apart from broadband deployment programs will not only contribute to enhancing the sustainability of digital inclusion programs, but will also leverage existing investments and increase their potential impact.

BEAD

The Broadband Equity, Access, and Deployment (BEAD) program is a \$42.45 billion program authorized through the BIL that will provide grants to States and territories to bridge the digital divide.²³ NTIA is tasked with administering the program and will distribute a minimum of \$100 million to each U.S. State, territory, and the District of Columbia.²⁴ The remaining funds will be apportioned based on the number of unserved locations in that State as well as the number of unserved locations in high-cost areas in that State, relative to national totals.²⁵ BEAD funds can be used to competitively award subgrants for, among other things, broadband deployment projects in unserved and underserved areas and broadband adoption projects (including programs to provide affordable internet-capable devices).²⁶

After a State receives planning funds under the BEAD program, it must develop a 5-year action plan.²⁷ The action plan must be informed by collaboration with local and regional entities as well as detailed investment priorities, associated costs, and alignment of planned spending with economic development, telehealth, and related connectivity efforts.²⁸ NTIA established the

²³ Infrastructure Investment and Jobs Act, 47 U.S.C. § 1702(b)(1-2) (2021). [link](#).

²⁴ *Id.* at § 1702(c)(2) (2021).

²⁵ *Id.* at § 1702(c)(1) & (3) (2021).

²⁶ *Id.* at § 1702(f) (2021).

²⁷ *Id.* at § 1702(e)(1)(D) (2021).

²⁸ *Id.* at § 1702(e)(1)(D)(i) (2021).

requirements for the action plan in the BEAD NOFO, released on May 13, 2022, which include requirements to address local and regional needs in the State concerning broadband service and propose solutions for the deployment of affordable broadband service in the State, among other things.²⁹

Aligning BEAD & DEA Planning

While the planning processes and end products may be separate, the BEAD and DEA plans should be intentionally linked, complementary, and mutually supportive of obtaining the same goals. Workforce development can be intentional in ensuring that local citizens are economically participating in the jobs that will be created. It's not just affordability, it is economic advancement. The NOFOs recommend the following to establish a strong synergy and joint accountability between the two plans.

A direct communication pathway would benefit BEAD and DEA planning and reduce the burden and confusion on community stakeholders, especially should the States interface directly with residents through surveys, focus groups, or town halls during the planning processes.

For example, information gathered during the BEAD stakeholder engagement that may impact the DEA plan should be shared with the DEA planning team and vice versa. Given the interconnected nature of broadband availability and broadband adoption, a resident's experience with broadband and being disconnected is typically a mix of factors. When asked about broadband, information about a lack of access to their household or neighborhood is as likely to be discussed as a household's inability to adopt the service if it is available to them because of adoption barriers.

The burden of repeating their lived experiences should not be placed on the residents engaging in the planning process.

1. Integrate the portions of the BEAD and DEA plans where DEA covered populations are the focus of goals. Covered populations, as defined by DEA, are statistically likely to have lower broadband adoption rates. Considering their barriers to adoption within the BEAD plan will increase the adoption of the funded deployment projects. Addressing broadband adoption barriers while deploying availability solutions will enhance all efforts for both plans.

²⁹ BEAD NOFO at Section IV.B.3. See also Act at § 1702(e)(1)(D)(ii) (2021).

2. Align plan goals and strategies, ensuring they complement and build on each other. Aligning plan goals and strategies for DEA and BEAD plans will increase both impacts. For example, both plans will need to address affordability. The strategies to address affordability in the DEA plan should build on the required low-cost service programs in the BEAD plan. Another example is the common goal of supporting the development of a highly skilled workforce. Strategies for training and workforce development for broadband-related occupations through the BEAD program should be coordinated with broader digital literacy and inclusion efforts through the Digital Equity Planning program.

Figure 10

Aligning BEAD and DEA Planning



Broadband Workforce Development

States participating in BEAD have a unique opportunity to be intentional and strategic in developing their community's workforce to implement their broadband deployment projects. Through the BEAD program, States are not just building broadband infrastructure or deploying networks; States are also directly enabling economic advancement for those in their community. The States' infrastructure projects will create jobs and economic opportunities – all while increasing broadband availability and adoption, which will spur more opportunities for future generations. The benefits will continue to ripple through the community and over the years.

How can States develop a workforce that is inclusive and highly skilled?

Foster local workforce opportunities

Create opportunities for local residents to participate in the infrastructure development that is occurring in their own communities. Workers from the community will be familiar with its needs and nuances. Tap into your local talent to support job growth and economic opportunity close to home.

Consider matching prevailing wages

BEAD projects will create many job opportunities in the State. States can maximize this economic benefit by compensating the local workforce appropriately and providing benefits that are competitive with marketplace standards.

Set strong labor standards

States can commit to strong labor standards and protections for their employees and contractors, following all applicable labor and employment laws. A safe and healthy work environment is critical to create a reliable pipeline of skilled workers and minimize costly and disruptive delays.

Promote equitable opportunities

Make job opportunities available to a diverse pool of workers, particularly to populations that have been traditionally underrepresented in broadband and information technology jobs, such as women, people of color, and other historically marginalized groups.

States can foster equitable opportunity by partnering with nonprofits, advocacy groups, minority- and women-owned businesses, and community-based organizations to reach a diverse pool of workers.

Provide training

Attract and retain workers by collaborating with industry, unions, education-providers institutions of higher education, career technical schools, and other organizations to offer training programs. With these skills and credentials, workers will be well-equipped for future job opportunities as well. States can also support workers in accessing and completing trainings by providing services such as childcare and transportation.

By focusing on an inclusive workforce for their broadband projects, States can make strides toward digital equity, as well as economic equity. Historically, many residents in underrepresented communities have not enjoyed the economic benefits of development in their neighborhoods. States can break that cycle by fostering opportunities to attract, train, retain, or transition workers to directly support broadband projects. In turn, these efforts can decrease poverty rates, increase overall educational and health outcomes, and improve quality of life overall.

Beyond Planning

In addition to the planning, BEAD recipients may interweave digital equity throughout their performance of a BEAD award in other ways. For example, BEAD funds can be used for broadband adoption projects and addressing deployment to unserved and underserved communities. As the State develops the BEAD five-year action plan, consider where BEAD funds can support broadband adoption projects. Broadband adoption projects include the same activities eligible for funding under the Digital Equity Competitive Grant Program established by the DEA.

States can also require BEAD sub-recipients to partner with trusted community-based organizations to assist eligible households with signing up for service, integrate local digital inclusion programming into their outreach initiatives, and prioritize outreach in low-income neighborhoods, particularly historically disconnected communities. Finally, prioritizing the allocation of BEAD funds to community-based, locally accountable providers would advance digital equity. For example,

Figure 11

5-Year Broadband Action Plan

Did you know — After a state receives planning funds under the BEAD program, it must develop a 5-year action plan.



Collaborate



Involve Local & Regional Entities



Align Planned Spending



Consider Related Connectivity Efforts

The 5-Year Action Plan must be informed by collaboration with local, regional, and Tribal (as applicable) entities, and should detail investment priorities and associated costs, and align the State's planned spending with its economic development, community benefit, workforce, telehealth, digital equity, and other related efforts.³⁰

³⁰ NTIA, BroadbandUSA, Notice of Funding Opportunity Broadband Equity, Access, and Deployment Program, [link](#).

community and municipally owned networks, electric member cooperatives (EMCs), and telephone member cooperatives (TMCs) are all community based and owned by community members, thus are proactively accountable to the community members and sensitive to their nuanced needs, including affordability barriers to broadband adoption.

Affordability Strategies

The fact that a broadband subscription is all too often not affordable for a household is a primary reason 28 million households across the country lack broadband in their homes. According to the Pew Research Center, 26 percent of people across the U.S. are worried about paying their Internet bill over the next few months, and 54 percent of all households earning less than \$25,000 a year don't have a broadband subscription.

Studies show that \$10 per month is the most that low-income Americans can afford to pay for broadband. However, according to Pew Charitable Trusts, the average cost of a monthly subscription ranges from \$50 to nearly \$70.

Certain government programs like the **Affordable Connectivity Program (ACP)** can help promote broadband affordability. ACP is a federal program under the FCC that provides to eligible households' monthly discounts of up to \$30 on Internet service costs and one-time discounts of up to \$100 for connected devices. The monthly discount is higher (\$75) for households on qualifying Tribal lands and households in high-cost areas. However, ACP has a finite amount of funding and is not yet a permanent program.

Defining Affordability for 'Low-Cost Broadband Service Options'

The BIL and the BEAD NOFO provides responsibilities to States and territories with developing "low-cost broadband service options" in consultation with NTIA and broadband providers. In addition, Capital Projects Fund recipients are encouraged to require sub-grantees (i.e., providers) to include "at least one low-cost option offered at speeds that are sufficient for a household with multiple users to simultaneously telework and engage in remote learning."³¹

³¹ U.S. Department of the Treasury. Guidance for the Coronavirus Capital Projects Fund: For States, Territories, and Freely Associated States (2021). (See page 4). [link](#).

Poverty and Income Analysis

The downside of establishing a fixed price point for the “low- cost broadband service option” is its inflexibility. In some communities, \$30 is affordable. In others, it is not. As such, States should analyze the State’s socioeconomic landscape to determine where the \$30 price point may not fully address affordability barriers. For example, States should examine metrics such as median household income, property value, and the number of households with students enrolled in school lunch programs. Through this analysis, States will gain a deeper understanding of where additional efforts will be needed to address affordability fully.

Provider Appeal Process

Providers may assert that they cannot profitably provide service at a \$30 price point for the “low-cost broadband service option” in a particular area. States should establish a process through which providers can formally assert that the \$30 price point is infeasible, provide proof to that effect, and request an exemption from the \$30 maximum. In proving the financial infeasibility of providing service at a \$30 price point to a particular area, providers should be required to utilize a long-term profitability model in their financial projections and establish that profitability is impossible in the long-term, not just a short-term period of three to five years.³²

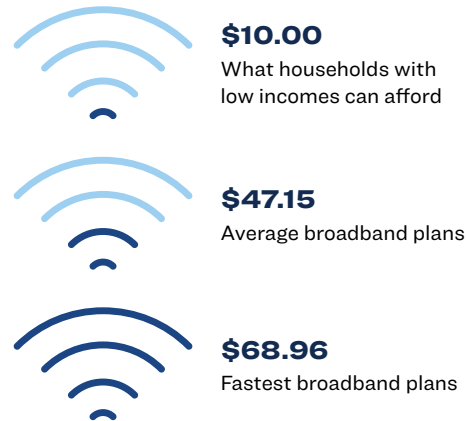
ACP Outreach

States can also impact affordability by ensuring their eligible households are aware of, understand, and enroll in the ACP program. Building awareness of the program requires concerted outreach across mediums (at home, at social service locations, via social media, phone, and more.) and in simple and accessible terms (e.g., multilingual outreach, plain English, not exceeding 8th-grade reading comprehension). Successful approaches are often all-hands-on-deck, requiring collaboration across offices and agencies that already interact with underserved households. For example, New York State conducted a **successful campaign** in early 2022 to educate consumers on the ACP, signing up an additional 100,000 households in

³² Falcon, Ernesto Why Slow Networks Really Cost More Than Fiber. Electronic Frontier Foundation, Electronic Frontier Foundation (June 4, 2020). [link](#).

Figure 12

Affordable Strategies



less than three months. In addition, the State’s Office of Temporary and Disability Assistance is directing social services agencies to share outreach materials with clients and contracted service providers; Housing and Community Renewal reached out to housing nonprofits and landlords; the Department of Labor developed a public service announcement video, and the Department of Motor Vehicles pushed ACP information at State-operated offices.

Capital Projects Fund (CPF)

The Department of Treasury’s Capital Projects Fund recipients may use grant funds for “critical Capital Projects that directly enable work, education, and health monitoring, including remote options, in response to the public health emergency.” This means recipients may use grant funds for anything (with a few exceptions — roads, bridges, transit systems, etc.) that meets the following three criteria:

1. The Capital Project invests in capital assets designed to enable work, education, and health monitoring.
2. The Capital Project is designed to address a critical need that resulted from or was made apparent or exacerbated by the COVID-19 public health emergency.
3. The Capital Project is designed to address a critical need of the community to be served by it.

Even though a wide net is cast, Treasury anticipates most recipients will use the funds for broadband projects, so they have Stated that the following three types of projects are presumptively eligible:

1. Broadband Infrastructure Projects (construction and deployment of broadband infrastructure);
2. Digital Connectivity Technology Projects (purchase and/or installation of devices and equipment to facilitate broadband Internet access); and
3. Multi-Purpose Community Facility Projects (construction or improvement of buildings that are designed to jointly and directly enable work, education, and health monitoring)

Other eligible uses of CPF funds may include:

- Digital literacy training, digital navigation, and digital inclusion services, if they are deemed “ancillary costs necessary to put the capital asset to use.”³³
- Constructing or improving libraries, community health centers, or full-service community schools. Gigabit Internet, public Wi-Fi, and lendable computers would be an “improvement” for many libraries, community health centers, and full-service community schools.
- If an applicant requests funds to purchase computers (a capital asset) to lend through libraries, then digital literacy, technical support, and digital navigation expenses would also be eligible.
- If an applicant requests funds to build a gap network and addresses affordability through the network, they could also invest in community engagement and broadband adoption efforts to support subscriptions to the network.
- If an applicant requests funds to wire all libraries and community health centers with fiber, they could invest in digital navigation and digital literacy courses.

For more information on what constitutes a broadband infrastructure project, a digital connectivity technology project, or a multi-purpose community facility project, see Treasury’s [Capital Projects Fund Guidance](#).³⁴

Coronavirus State and Local Fiscal Recovery Funds (SLFRF)

The Department of Treasury’s SLFRF funds may be used for a range of projects that respond to the public health and economic impacts of COVID-19, including:

- Affordability programs, such as subsidies that address the cost of Internet service
- Digital literacy programs, such as standard digital literacy classes or digital navigator programs
- Programs that provide devices and equipment to access the Internet to households (e.g., programs that provide equipment like tablets, computers, or routers)
- Services that expand Internet access without constructing new networks (e.g., expansion of public Wi-Fi networks or free Wi-Fi in public housing communities). Other programs that support the adoption of Internet service where service is available

SLFRF funds may also be used to invest in broadband infrastructure. SLFRF recipients must address affordability while building new broadband networks. The SLFRF Final Rule States, “a project cannot be considered a necessary investment in broadband infrastructure if it is not affordable to the population the project would serve.” The SLFRF Final Rule outlines two ways recipients should address affordability:

- “Lack of affordable broadband” is now considered a quality that recipients can use to identify areas eligible for investment with SLFRF funds.
- If a project provides Internet service to households, it now requires the ISPs to participate in the Affordable Connectivity Program or comparable program.

For more information on eligible uses of SLFRF fund see Treasury’s [SLFRF Final Rule](#).³⁵

33 U.S. Department of the Treasury. Guidance for the Coronavirus Capital Projects Fund: For States, Territories, and Freely Associated States (2021).

34 Id.

35 Coronavirus State and Local Fiscal Recovery Funds Final Rule: 87 Fed. Reg. 4338 (Jan. 27, 2022) (to be codified at 31 C.F.R. Part 35), [link](#).

BIP and CMC & Tribal Connectivity Program

NTIA also manages the Broadband Infrastructure Program (BIP),³⁶ the **Connecting Minority Communities Pilot Program (CMC)**³⁷ and **Tribal Broadband Connectivity Program**.³⁸ Grantees from these programs could already be developing or launching digital inclusion projects or programs.

Connecting with the BIP, CMC and Tribal Broadband Connectivity Program grantees in the State could provide an opportunity for partnership. In addition, the lessons they are learning through their projects could inform the BEAD and DEA plan.

Strengthen Collaboration, Engagement, and Outreach

Robust and meaningful stakeholder collaboration, engagement, and outreach will be a hallmark of effective and successful State digital equity plans. Stakeholder engagement should not be a one-time occurrence but rather be baked in throughout the entire planning process with multiple permeable pathways for residents and trusted community-based organizations to participate in the process. Like all relationships, building goodwill and trust with stakeholders through meaningful engagement takes time.

Meet People Where They Are

In 2021, the Louisiana broadband office began a traveling roadshow, visiting 50+ small towns throughout Louisiana's 64 parishes. They reached out to mayors and local elected officials to organize listening sessions on broadband. They brought simple, one-page informational flyers with data representing that community's broadband access, adoption, Emergency Broadband Benefit (EBB) enrollment rates, and digital literacy rates. They provided information about the future State and federal funds and listened to the community's broadband and digital inclusion needs. They purposely did not use PowerPoint presentations, opting for roundtable-style sessions to provide a more intimate peer-to-peer environment.

³⁶ NTIA, BroadbandUSA: Broadband Infrastructure Program: [link](#).

³⁷ NTIA, BroadbandUSA: Connecting Minority Communities Pilot Program, [link](#).

³⁸ NTIA, BroadbandUSA: Tribal Broadband Connectivity Program, [link](#).

Other States have opted for virtual convenings, like Hawaii's Office of Broadband and Digital Equity, which in March 2020, virtually convened a group of allies working towards digital equity. The Broadband Hui as it is known, has met weekly since and consists of over 200 individuals and organizations. Both States' sustained engagement of partners and residents have greatly benefited the stakeholders and the State leaders.

Create a Stakeholder Engagement Plan

Before beginning the planning process, designing a robust stakeholder engagement plan that weaves stakeholder engagement throughout the entire planning process and elevates the voices of those who directly work with or have direct lived experience of being disconnected will support the overall planning process. Ensuring the voices of covered populations and underrepresented groups are built into the planning process is essential to ensure the plan is comprehensive and honestly addresses the concerns and needs of the State's disconnected residents. In addition, intentionally engaging organizations trusted by historically disconnected communities will require thoughtful planning.

Approaches to Engagement

Knowing who to reach out to is only half the battle because the approach to community engagement is equally important. Successful outreach should employ a mix of strategies, communications channels, and messengers to be effective, including:

- using diverse communications tools to connect, including websites, social media, phone calls, info sessions and town halls, and old-fashioned door-to-door community outreach
- meeting during non-work hours to ensure working adults, parents, and others can participate
- striving for engagement across geographically diverse sections of your State
- clarifying with engaged organizational goals, the information gathered, how that input will be used, what type of follow-up will be conducted, and how they can keep track of your work (e.g., website, listserv, ongoing public check-ins)

Follow up and provide updates. It is also important to engage organizations that are doing meaningful work and providing support to increase their capacity.

Engage Diverse Communities

The DEA requires the administering entity to “list the organizations the State collaborated with in developing and implementing the plan.” Congress outlined a list of organizations to include in the planning and implementation process, including, but not limited to:

- Community anchor institutions, CBOs, and nonprofits;
- Counties, city governments, and Indian Tribes, Alaska Native entities, or Native Hawaiian organizations (where applicable);
- Local educational agencies, school districts, and workforce development organizations;
- Organizations that represent:
 - individuals with disabilities, including children with disabilities,
 - aging individual,
 - individuals with language barriers (e.g., English learners, low English proficiency, immigrant groups),
 - individuals who have low levels of literacy,
 - veterans, and
 - incarcerated individuals in facilities other than federal correctional facilities
- Civil rights organizations
- Public housing authorities in the State

Additional Types of Organizations to Consider Engaging

While all State agencies should be included in some aspect of the planning process, the agencies who directly or indirectly serve the covered populations should be consulted throughout the planning process, including:

- Department of Education
- State Library
- Department of Health and Human Services
- Workforce Development Department
- Housing Department
- Department of Commerce or Economic Development
- State Technology or Digital Service Office
- Members of the covered populations and historically disconnected communities (lived experts)

- State cabinet-level agencies
- State corrections department/agency
- State departments of education
- Digital inclusion coalitions located in the State
- State and local chambers of commerce or industry associations
- Regional councils of governments
- Economic development authorities
- Higher education institutions
 - State higher education coordinating board or governing board
 - Community or Technical College System
 - Public and Private Universities
 - Minority Serving Institutions
- Public housing resident associations and other low-income housing providers
- Labor unions (in particular — telecommunications workers’ unions)
- Healthcare systems and networks
- Homeless continuum of care providers
- Private and nonprofit multi-family housing developers and owners
- Faith-based institutions (i.e., churches, temples, mosques, etc.)
- Entrepreneurs and business owners
- State or local foundations and funders
- Advocacy organizations
- Existing multi-stakeholder groups (i.e., councils on aging, etc.)
- Refugee resettlement organizations
- Re-entry organizations
- Organizations serving undocumented residents
- Early intervention coordinators (i.e., those providing in-home therapy for children ages 3 to 5)
- Trade organizations
- Agriculture extension offices
- Cultural organizations
- Local media outlets such as PEG station leaders and Ethnic media

Tribal Engagement

U.S. territories and possessions, Indian Tribes, Alaska Native entities, and Native Hawaiian organizations that receive awards from the appropriate funding may use funds to further their participation and equity interests in the development of relevant State digital equity plans under this program or both.

Like all other stakeholders, States should engage with Tribes in their State early and often through meaningful consultation. Engagements should be conducted as peer-to-peer engagements, as Tribes are sovereign and govern themselves. This means they are distinct governments, and any decisions about the Tribes concerning their property and citizens are made with their participation and consent. Use intergovernmental collaboration best practices when consulting with and engaging with Tribes to develop the plan.

Effective Tribal engagement requires meaningful consultation and proactive relationship-building efforts with members of Tribal communities. Rather than merely “box-checking,” States should engage in good-faith, ongoing efforts to empower Tribal communities in the planning process and to develop trustworthy relationships with Tribes in their States. States should avoid injecting Tribal communities into the planning process after substantial planning has occurred; Tribal

voices should be included in the planning process from beginning to end.

Request broadband and digital equity plans along with information about ongoing broadband deployment projects and digital equity programs from local and regional governments in the State; also, request this information from Tribes located in the State. Again, staying in communication with Tribes will ensure you know of any changes that could impact the digital equity plan.

Form a Core Planning Team

Creating the State digital equity plan will necessarily be a team effort. Thus, the first recommended step is forming a core planning team consisting of a diverse set of stakeholders and partners to lead and advise the development of the plan. A core planning team could be composed of multiple staff members of the administering entity and a member of the team leading the BEAD planning process. Additional core planning team members could include partners from other State agencies, universities, representatives of community-based organizations and community anchor institutions who work directly with the covered populations, digital inclusion practitioners, and “lived experts” who are members of the covered populations. The administering entity is the natural lead for the planning team and the development of the plan, but the core planning team can serve as an advisory group of sorts, supporting the administering entity as it progresses through the planning process.

A core planning team would likely be between four and ten people—a small group but large enough to ensure a variety of voices are included throughout the process and large enough to disburse responsibilities. The administering entity would be responsible for clearly defining and delineating roles and expectations for each planning team member. Throughout the planning process, the core team can provide feedback and guidance to the administering entity. In addition, the core team could support the administering entity in identifying and connecting with stakeholders, among other tasks that will present themselves throughout the planning process.

Finally, States can consider leveraging their planning funds to pay stipends to “lived experts,” or residents of the covered populations with direct, lived experience of being caught in the digital divide, to be members of the planning team.

Figure 13

Forming a Core Planning Team



Collaborate with State Agencies and Peers

The effectiveness of the digital equity strategy will depend on the ability to marshal and scale all available resources across the State government. This means leveraging informal State working groups or formal planning organizations, including existing appointed or convened broadband and digital equity task forces and councils. Understanding existing touchpoints the State agencies already have with covered populations (e.g., families with low incomes, individuals with disabilities, veterans) can maximize your ability to collect data on existing gaps in infrastructure and services and efficiently communicate the DEO's existing and forthcoming offerings. Collaboration with State and local agencies should expand beyond those focused on broadband and digital equity, and should include agencies dedicated to health, commerce and workforce, education, and housing. Broadband and digital equity have a role to play in each of those areas.

For example, Colorado incorporated its Digital Skills Survey into [existing surveys](#)³⁹ run by the Colorado Department of Public Health & Environment to minimize additional effort by State agencies and target populations. Other States have worked with high-touch agencies and offices with direct connections to target populations, including the department of motor vehicles, housing and homelessness agencies, Supplemental Nutrition Assistance Program (SNAP) and social service offices, department of corrections, department of labor and unemployment, and health and human services agencies.

Using a planning structure, existing relationships, and the DEO's mandate, incorporate surveying and messaging content in existing mailers, fliers, email campaigns, social media content, town halls, and websites. Focus on highlighting existing offerings, the importance of accurate data collection to deliver new services, and pointing to the DEOs website as the best source of updated information. Finally, leverage NTIA's existing list of State templates ([Appendix A](#)) and reach out directly to colleagues in other States to quickly replicate best practices.

In addition to integrating digital equity with broadband deployment programs (mentioned above), it is also critical to align Statewide planning and investment in areas such as workforce development, housing,

39 Bergson-Shilcock, A. (2022, March 22). States are leading the way on digital equity [National Skills Coalition]. Skills Blog. [link](#).

telehealth, and education. For example, State employment agencies, workforce development organizations, and education agencies are taking various measures to build a highly skilled workforce and close the digital skills gap. These efforts often center on digital literacy training, digital navigation, and technology distribution. It is critical to integrate not only data collection and mapping efforts, but also to align strategies and programs. Bringing multiple agencies to the table will help ensure that communities and populations with the highest needs and lowest likelihood to participate in digital literacy training or other services being adequately addressed.

Establish a Task Force or Council

As a part of general broadband expansion planning or in response to the pandemic, some States such as Wisconsin and Illinois have appointed broadband or digital equity planning task force or council tasked with advising State broadband offices and DEOs on bridging their digital divides. These councils are either established by legislative statutes, executive orders or, in some cases, are informal (i.e., established without an executive order or statute), public-facing, or internal government-facing (e.g., working groups of State agency leads).

Wisconsin, for example, has a Task Force on Broadband Access, established through an executive order from Governor Evers in 2020, which includes a digital equity subcommittee and a Digital Equity and Inclusion Stakeholder group of 50 to 60 people.

The governor selected the members of the Task Force who led the compilation of a [report](#)⁴⁰ in 2021 with recommendations to close broadband access gaps and increase broadband adoption and affordability. The Wisconsin [Public Service Commission \(PSC\)](#) convenes the stakeholder group monthly. The digital equity and inclusion stakeholder group, which has an open-door policy, meets virtually every month and provides organizations the opportunity to form relationships, establishing connections between different organizations and sectors that either directly run digital inclusion programs or whose work is impacted by digital inequities. Rhode Island also plans to establish an interagency working group to engage sister agencies and support the coordination and execution required to implement the BEAD and DEA programs.

40 Governor's Task Force on Broadband Access, Report to Governor Tony Evers and Wisconsin State Legislature. Public Service Commission of Wisconsin (2021), [link](#).

Staff, chair, or be a task force/council member or work in tandem with its existing membership. If asked to advise on appointments to the council, ensure that diverse organizations are represented, including social service institutions, community-based organizations, digital service providers, essential government agencies, and forward-thinking and collaborative Internet service providers.

Learn from Digital Inclusion Practitioners

A State digital equity plan should be designed to create specific, Statewide strategies to serve those most affected by the digital divide. Nevertheless, many plans are created in a vacuum without input from those the plan is designed for — the residents. No State leader can learn the specific needs of each of their residents. However, States can learn from the many organizations that have developed thoughtful strategies incorporating community input into their planning process.

The digital inclusion field is relatively young. However, best practices and models for holistically addressing the digital divide exist. Before embarking on the planning process:

1. Spend time learning about what has and hasn't worked for those working toward digital equity in your State and across the country.
2. Consult existing local digital equity plans and learn about ongoing digital inclusion or broadband deployment coalitions, projects, and programs in the State.
3. In addition, talk to peers across the country and join networks like NDIA, where many local and State subject matter experts regularly meet and discuss promising practices and practical research.
4. See [Appendix A](#) for a list of resources.

In addition, the entity organizations should begin getting to know the local digital inclusion practitioners across their State. NDIA estimates that more than 40 communities (cities, towns, and regions) across the country have at least one active digital inclusion coalition. Identifying existing coalitions in the State and attending their meetings to get to know the practitioners, organizations, and the digital inclusion work they do can assist the State as it begins stakeholder engagement. For example, Ohio's broadband office

regularly attends local digital inclusion coalition meetings and, in doing so, has established relationships with the 30 to 50 digital inclusion organizations that are members of each coalition. Coalitions are also positioned to support the DEO as they engage with residents in the planning process.

Use and Collect Data to Understand Assets and Needs

The plan will rely heavily on the best available data to quantify needs and estimate costs. Prepare to begin the data collection process by planning how to collect data, learning about the existing data sources, thinking through existing data and how it can be leveraged for the plan (i.e. speed test data, digital skills data, etc.), and identifying whether local governments or digital inclusion coalitions in the State have already begun collecting local data that could be included in the asset inventory and needs analysis.

Best data sources include:

- **Availability:** FCC Form 477, State/local mapping, Geotel telecommunications infrastructure data (proprietary), speed tests (national datasets from FCC, Ookla, M-Lab, State and local speed test data), asset mapping of digital skills training and low-cost computer programs
- **Affordability:** Surveys of ISPs and service providers, State/local surveys of residents, NDIA Free & Low-Cost Plans list
- **Adoption:** American Communities Survey (ACS) 1-year and 5-year estimates, FCC Internet Access Services Reports, EBB/ACP enrollment, State/local surveys of residents

Remember:

Availability

Affordability

Adoption

Many States have run such analyses, with select formats and templates, in [Appendix A](#). In general, the information offered by the FCC or commercial ISPs might overstate the availability and affordability of existing services. Availability analysis can be complicated by including speeds that are lower than what is generally accepted as “broadband” (≥ 100 Mbps).

Affordability analysis can be complicated by including introductory offers and pricing that requires families to subscribe to multiple television and phone services or pay additional rental and equipment fees. While gathering data promptly is critical, the means of gathering data is equally important, especially because disconnected or poorly connected communities are hard to reach digitally. Consider employing door-knocking teams in affordable housing complexes, calling and texting residents, gathering in-person data at town halls, or asking questions at existing high-traffic social services offices (e.g., DMVs, unemployment offices) and public education institutions (e.g., community colleges) to ensure you are reaching the least connected groups.

Some States have collected their data throughout the State, and others have equipped local governments and coalitions to collect local data, including assets. Hawaii, for example, has done a Statewide study of [digital literacy and readiness](#), and Utah launched a Statewide [speed test and survey](#). At the same time, [Nebraska](#) and [North Carolina](#) have created tools for local coalitions and governments to develop local digital inclusion plans. The resources they have created could be helpful for communities in the State seeking to develop their own local digital inclusion plans and for the entity to create a data collection plan.

Asset Mapping

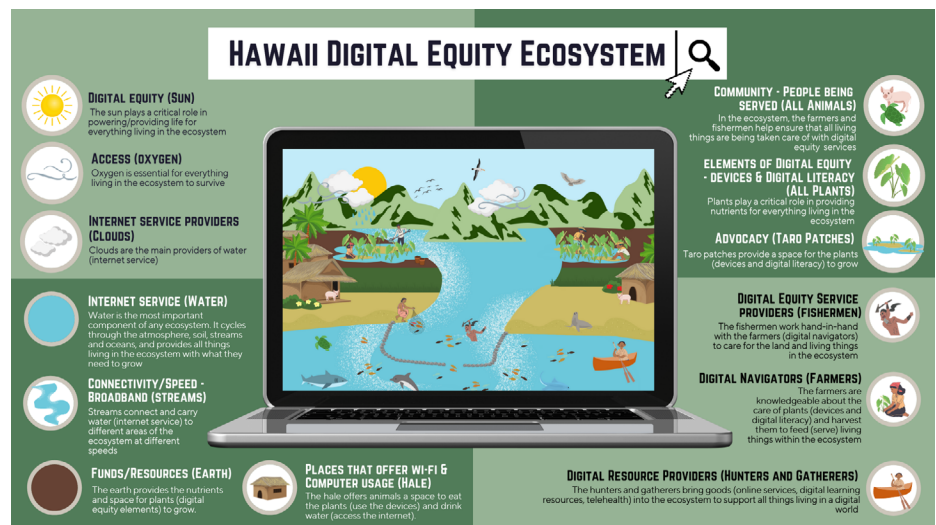
Asset mapping identifies a community’s existing resources, networks, and strengths in order to build upon them. By leveraging the resources in a community, asset mapping helps identify opportunities to support and scale strategies already in place. This, in turn, supports the empowerment of community residents and institutions and promotes ownership in the community-building process.

An asset inventory for your State digital equity plan will be a snapshot of the current landscape, an inventory of the assets present throughout the State that currently do, or potentially could, to support digital equity in each of these categories, prior to outlining measurable objectives. The inventory should include physical assets such as broadband infrastructure and ongoing deployment projects, organizations, programs, and individuals delivering digital inclusion services, funding sources to support digital equity work, and any other resources deemed essential to characterize the digital equity landscape. Establishing meaningful and measurable objectives requires a thorough understanding of the current landscape.

Hawaii’s [digital equity ecosystem map](#) is a stunning example of a collective effort to understand and document the State’s current digital equity ecosystem while simultaneously setting goals for growth.

Figure 14

Hawaii Digital Equity Ecosystem



Appendix A: Best Practices Across States

State	Link	Description
California	Research - Equity Best Practices	California research on quick strategies to improve EBB enrollment
California	Planning Document - Commission Report	California "Broadband for All" planning document
Colorado	Research - Digital Skills Survey	Colorado Digital Skills Survey Questions
Louisiana	Research - Geographic Data	Dashboard highlighting broadband access, affordability, and digital literacy across LAs parishes
Louisiana	Org Design - Commission Mandate	Executive order highlighting the roles, responsibilities, and mandates of Louisiana's broadband for all commission
National	Org Design - Team Structure	National Broadband Resource Hub document on structuring state high-speed internet offices
Nebraska	Planning Document - Planning Guide	Nebraska Digital Inclusion Planning Guide & Workbook
Nebraska	Planning Document - Plan Template	Nebraska Digital Inclusion Plan Template
New York	Org Design - Job Description	Director of Outreach JD
New York	Org Design - Job Description	Digital Inclusion Manager for NYCHA JD
New York	Org Design - Job Description	Director of Digital Equity
North Carolina	Research - Geographic Data	Index highlighting internet availability, quality, and adoption
North Carolina	Research - Community Outreach Guide	Guide for doing internet access and adoption outreach across communities using multiple mediums
Washington	Research - Community Outreach Guide	Washington Digital Equity Forum
Wisconsin	Planning Document - Commission Report	Governor's Task Force report and recommendations on high-speed internet and digital equity expansion
Wisconsin	Org Design - State Org Chart	Wisconsin statewide high-speed internet and digital equity office organizational chart

Appendix B: Definitions

Digital Equity

Digital equity is a condition in which all individuals and communities have the information technology capacity needed for full participation in our society, democracy and economy. Digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services.

Digital Inclusion

Digital inclusion refers to the activities necessary to ensure that all individuals and communities, including the most disadvantaged, access and use Information and Communication Technologies (ICTs). This includes five elements: 1) affordable, robust broadband Internet service; 2) Internet-enabled devices that meet the needs of the user; 3) access to digital literacy training; 4) quality technical support; and 5) applications and online content designed to enable and encourage self-sufficiency, participation and collaboration. Digital inclusion must evolve as technology advances. Digital inclusion requires intentional strategies and investments to reduce and eliminate historical, institutional, and structural barriers to access and use of technology.

Digital Divide

The digital divide is the disparity in access to, knowledge of, and ability to use digital tools and technology.

Digital Literacy

The American Library Association has defined "digital literacy" as the following:

Digital literacy is the ability to use information and communication technologies to find, evaluate, create, and communicate information, requiring both cognitive and technical skills.

A digitally literate person:

- Possesses the variety of skills – technical and cognitive – required to find, understand, evaluate, create, and communicate digital information in a wide variety of formats;
- Can use diverse technologies appropriately and effectively to retrieve information, interpret results, and judge the quality of that information;
- Understands the relationship between technology, life-long learning, personal privacy, and stewardship of information;
- Uses these skills and the appropriate technology to communicate and collaborate with peers, colleagues, family, and on occasion, the general public; and
- Uses these skills to participate in civic society actively and contribute to a vibrant, informed, and engaged community.

Appendix C: The Digital Equity Act — State Plan Section

*The following text is from the [Infrastructure Investment and Jobs Act](#)

DIVISION F—BROADBAND TITLE III—DIGITAL EQUITY ACT OF 2021

SEC. 60304. STATE DIGITAL EQUITY CAPACITY GRANT PROGRAM.

(c) STATE DIGITAL EQUITY PLAN.—

(1) DEVELOPMENT; CONTENTS.—A State that wishes to be awarded a grant under subsection (d) shall develop a State Digital Equity Plan for the State, which shall include—

(B) measurable objectives for documenting and promoting, among each group described in subparagraphs (A) through (H) of section 60302(8) located in that State—

(i) the availability of, and affordability of access to, fixed and wireless broadband technology;

(ii) the online accessibility and inclusivity of public resources and services;

(iii) digital literacy;

(iv) awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and

(v) the availability and affordability of consumer devices and technical support for those devices;

(C) an assessment of how the objectives described in subparagraph (B) will impact and interact with the State's—

(i) economic and workforce development goals, plans, and outcomes;

(ii) educational outcomes;

(iii) health outcomes;

(iv) civic and social engagement; and

(v) delivery of other essential services;

(D) in order to achieve the objectives described in sub-

paragraph (B), a description of how the State plans to collaborate with key stakeholders in the State, which may include—

(i) community anchor institutions; (ii) county and municipal governments;

(iii) local educational agencies;

(iv) where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;

(v) nonprofit organizations;

(vi) organizations that represent—

(I) individuals with disabilities, including organizations that represent children with disabilities;

(II) aging individuals;

(III) individuals with language barriers, including— (aa) individuals who are English learners; and (bb) individuals who have low levels of literacy;

(IV) veterans; and

(V) individuals in that State who are incarcerated in facilities other than Federal correctional facilities;

(vii) civil rights organizations;

(viii) entities that carry out workforce development programs;

(ix) agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;

(x) public housing authorities in the State; and

(xi) a partnership between any of the entities described in clauses (i) through (x); and

(E) a list of organizations with which the administering entity for the State collaborated in developing and implementing the Plan.

Appendix D: Covered Populations

The DEA defines the populations.

Covered Populations:

- Individuals who live in covered households (i.e. households with income less than or equal to 150 percent of the federal poverty level);
- Aging individuals;
- Incarcerated individuals, other than individuals who are incarcerated in a federal correctional facility;
- Veterans;
- Individuals with disabilities;
- Individuals with a language barrier, including individuals who—
 - are English learners; and have low levels of literacy;
 - Individuals who are members of a racial or ethnic minority group; and
 - Individuals who primarily reside in a rural area

Appendix E: Broadband Equity, Access, and Deployment Program Planning Requirements

(D) ACTION PLAN. —

(i) IN GENERAL. —An eligible entity that receives funding from the Assistant Secretary under subparagraph (C) shall submit to the Assistant Secretary a 5-year action plan, which shall—

(I) be informed by collaboration with local and regional entities; and

(II) detail—

(aa) investment priorities and associated costs;

(bb) alignment of planned spending with economic development, telehealth, and related connectivity efforts.

(ii) REQUIREMENTS OF ACTION PLANS. —The Assistant Secretary shall establish requirements for the 5-year action plan submitted by an eligible entity under clause (i), which may include requirements to—

(I) address local and regional needs in the eligible entity with respect to broadband service;

(II) propose solutions for the deployment of affordable broadband service in the eligible entity;

(III) include localized data with respect to the deployment of broadband service in the eligible entity, including by identifying locations that should be prioritized for Federal support with respect to that deployment.

(IV) ascertain how best to serve unserved locations in the eligible entity, whether through the establishment of cooperatives or public-private partnerships;

(V) identify the technical assistance that would be necessary to carry out the plan; and

(VI) assess the amount of time it would take to build out universal broadband service in the eligible entity.

(2) NOTICE OF AVAILABLE AMOUNTS; INVITATION TO SUBMIT INITIAL AND FINAL

PROPOSALS.—On or after the date on which the broadband DATA maps are made public, the Assistant Secretary, in coordination with the Commission, shall

issue a notice to each eligible entity that—

(A) contains the estimated amount available to the eligible entity under subsection (c); and

(B) invites the eligible entity to submit an initial proposal and final proposal for a grant under this section, in accordance with paragraphs (3) and (4) of this subsection.

(3) INITIAL PROPOSAL.—

(A) SUBMISSION.—

(i) IN GENERAL.—After the Assistant Secretary issues the notice under paragraph (2), an eligible entity that wishes to receive a grant under this section shall submit an initial proposal for a grant, using the online application form developed by the Assistant Secretary under paragraph (1)(A)(iii), that—

(I) outlines long-term objectives for deploying broadband, closing the digital divide, and enhancing economic growth and job creation, including—

(aa) information developed by the eligible entity as part of the action plan submitted under paragraph (1)(D), if applicable; and

(bb) information from any comparable strategic plan otherwise developed by the eligible entity, if applicable;

(II)

(aa) identifies, and outlines steps to support, local and regional broadband planning processes or ongoing efforts to deploy broadband or close the digital divide; and (bb) describes coordination with local governments, along with local and regional broadband planning processes;

(III) identifies existing efforts funded by the Federal Government or a State within the jurisdiction of the eligible entity to deploy broadband and close the digital divide;

(IV) includes a plan to competitively award subgrants to ensure timely deployment of broadband;

(V)identifies—

(aa) each unserved location or underserved location under the jurisdiction of the eligible entity; and

(bb) each community anchor institution under the jurisdiction of the eligible entity that is an eligible community anchor institution; and

(VI)certifies the intent of the eligible entity to comply with all applicable requirements under this section, including the reporting requirements under subsection (j)(1).

(ii)LOCAL COORDINATION.—

(I)IN GENERAL.—The Assistant Secretary shall establish local coordination requirements for H. R. 3684—764 eligible entities to follow, to the greatest extent practicable.

(II)REQUIREMENTS.— The local coordination requirements established under subclause (I) shall include, at minimum, an opportunity for political subdivisions of an eligible entity to—

(aa) submit plans for consideration by the eligible entity; and

(bb) comment on the initial proposal of the eligible entity before the initial proposal is submitted to the Assistant Secretary.

(B)SINGLE INITIAL PROPOSAL.—An eligible entity may submit only 1 initial proposal under this paragraph.

(C)CORRECTIONS TO INITIAL PROPOSAL.—The Assistant Secretary may accept corrections to the initial proposal of an eligible entity after the initial proposal has been submitted...

(4)FINAL PROPOSAL.—

(A)SUBMISSION.—

(i)IN GENERAL.—After the Assistant Secretary approves the initial proposal of an eligible entity under paragraph (3), the eligible entity may submit a final proposal for the remainder of the amount allocated to the eligible entity under subsection (c), using the online application form developed by the Assistant Secretary under paragraph (1)(A)(iii), that includes—

(I)a detailed plan that specifies how the eligible entity will—

(aa) allocate grant funds for the deployment of broadband networks to unserved locations and underserved locations, in accordance with subsection (h)(1)(A)(i);

and (bb) align the grant funds allocated to the eligible entity under subsection (c), where practicable, with the use of other funds that the eligible entity receives from the Federal Government, a State, or a private entity for related purposes;

(II)a timeline for implementation;

(III)processes for oversight and accountability to ensure the proper use of the grant funds allocated to the eligible entity under subsection (c); and

(IV)a description of coordination with local governments, along with local and regional broadband planning processes.

(ii)LOCAL COORDINATION.—

(I)IN GENERAL.—The Assistant Secretary shall establish local coordination requirements for eligible entities to follow, to the greatest extent practicable.

(II)REQUIREMENTS.— The local coordination requirements established under subclause (I) shall include, at minimum, an opportunity for political subdivisions of an eligible entity to—

(aa) submit plans for consideration by the eligible entity; and

(bb) comment on the final proposal of the eligible entity before the final proposal is submitted to the Assistant Secretary. H. R. 3684—766

(iii)FEDERAL COORDINATION.—To ensure efficient and effective use of taxpayer funds, an eligible entity shall, to the greatest extent practicable, align the use of grant funds proposed in the final proposal under clause (i) with funds available from other Federal programs that support broadband deployment and access.

(B)SINGLE FINAL PROPOSAL.—An eligible entity may submit only 1 final proposal under this paragraph.

(C)CORRECTIONS TO FINAL PROPOSAL.—The Assistant Secretary may accept corrections to the final proposal of an eligible entity after the final proposal has been submitted.

Appendix F: Examples of Local & Regional Digital Equity/Inclusion Plans

Local Governments

- Alamance County Digital Inclusion Plan (2021)
- Carteret County Digital Inclusion Plan (2021)
- City of Long Beach Digital Inclusion Roadmap (2021)
- Digital Durham Digital Equity Plan (2021)
- Forsyth County Digital Equity Plan (2021)
- Rockingham County Digital Inclusion Plan (2021)
- City of Bloomington Digital Equity Strategic Plan (2020)
- City of Seattle Internet for All Report (2020)
- New York City Internet Master Plan (2020)
- City and County of San Francisco Digital Equity Strategic Plan (2019)
- City of Detroit Digital Equity & Inclusion 2019 + 2020 Timeline (n.d.)
- Provo City Government Digital Equity Administrative Directive (2019)
- Salt Lake City Digital Equity Policy (2019)
- City of Kansas City Digital Equity Strategic Plan (2017)
- Louisville Metro Government Digital Inclusion Plan (2017)
- City of Austin Digital Inclusion Strategy (2016)
- City of Portland Digital Equity Action Plan (2016)
- District of Columbia Digital Divide Report (2015)

Regional

- Land of Sky Regional Council Digital Inclusion Plan (2021)
- Upper Coastal Plain Digital Inclusion Plan (2021)

Appendix G: Resources and Support

General Digital Inclusion Resources

From NTIA

[Internet for All website](#)

From NDIA

[Digital Inclusion Coalition Guidebook](#)

[Defining a State Digital Equity Office White Paper](#)

[Digital Inclusion Startup Manual](#)

[Digital Inclusion Trailblazers \(local governments\)](#)

Database of local and regional place-based digital equity coalitions (forthcoming in 2022)

From Other Organizations

[Broadband Technology and Opportunities Program Evaluation Study](#), ASR Analytics

[Broadband Adoption Toolkit](#), NTIA

[Digital Navigator's Toolkit](#), Salt Lake City Public Library & NDIA

State Specific Digital Inclusion Resources

Many resources already exist to support the State in implementing the DEA programs as effectively as possible. The following short list will be updated as we and others develop more resources.

State Digital Equity Scorecard

NDIA's [State Digital Equity Scorecard](#), developed in partnership with Microsoft and the [National Skills Coalition](#), can support States by providing resources to measure, review, and replicate State digital inclusion efforts. The interactive map gives insight into State efforts and the link between unemployment, digital skills, and economic opportunities. The Scorecard is regularly reevaluated and updated to provide States with resources to measure, review, and replicate successful efforts.

NDIA's Asset Mapping Tools

NDIA is in the process of developing a suite of asset mapping tools for States, local governments, digital inclusion coalitions, and digital inclusion practitioners. The guidance and tools are comprehensive yet simple to implement and flexible enough to accommodate varying geographic scales and levels of detail.

National Broadband Resource Hub

The [National Broadband Resource Hub \(NBRH\)](#) is a free online community for government leaders and nonprofits working on expanding broadband access and affordability. The Hub houses a collection of expert broadband resources, including funding guides, policy analyses, how-to's, and more. Through the NBRH help desk, government employees and nonprofit organizations can book free consultation time with experts in broadband policy, funding, and program implementation. The NBRH also serves as a collaborative community platform for local leaders.

Additional Organizations with Helpful Resources

Benton Institute for Broadband & Society

Benton provides free, reliable, and non-partisan daily digest resources related to broadband developments and policy. These resources include Benton’s Daily and Weekly Digest, which breaks down and discuss issues related to the BEAD and DEA programs, the Affordable Connectivity Program, and the Universal Service Fund.

Common Sense Media

Common Sense is a leading provider of bilingual digital literacy resources for families and educators. Common Sense offers a K-12 digital literacy curriculum that is used by 88 percent of Title 1 schools; original research on the digital needs of vulnerable families; and advocacy to promote affordable, future-proof broadband networks and digital inclusion programs. Common Sense harnesses its unique insights on the digital divide at home and in school to help State policymakers create digital equity plans that work for all communities.

Next Century Cities

Next Century Cities (NCC) engages in outreach to State leaders and participates in State-level regulatory proceedings encouraging collaboration with local leaders on Statewide plans and State-specific resources for community leaders seeking to improve broadband access and adoption. NCC elevates local perspectives on broadband policy, highlighting the critical need for processes that invite local officials to the table and provide opportunities for meaningful local policy recommendations. As a conduit of State and local coordination, NCC supports strategies to expand connectivity across regions and promotes inter-governmental collaboration.

Pew Charitable Trusts

The **Pew Charitable Trusts** is a global nongovernmental organization that seeks to improve public policy, inform the public, and invigorate civic life. Through efforts like the broadband access initiative, Pew works with State and federal policymakers, researchers, and other partners to accelerate the nation’s progress toward universal, affordable high-speed Internet service. Pew provides technical assistance to help

nonprofit organizations, businesses, and governments make evidence-based policy decisions.

Pew analyzes data, develops implementation plans, tailors models to the specific needs of the organizations with which Pew works, monitors progress, and helps interpret results.

Schools, Health & Libraries Broadband (SHLB) Coalition

The **SHLB Coalition** is a nonprofit, 501(c)(3) advocacy organization committed to closing the digital divide by promoting high-quality broadband for anchor institutions (CAIs) and their communities. The SHLB Coalition believes in building broadband «to and through» CAIs as a way to provide low-cost connections to the communities surrounding the anchor institutions. The SHLB Coalition, which has regular convenings and serves as an educational resource for its members, can help connect States to CAIs who will play a critical role in digital equity planning and implementation.

Heartland Forward

Heartland Forward is a nonprofit “think and do” tank focused on changing the narrative about the middle of the country and kick-starting economic growth. Heartland Forward’s Connecting the Heartland initiative is a multi-State initiative (Arkansas, Illinois, Ohio, and Tennessee)[3] to ensure families in the heartland have access to the high-speed, affordable Internet service and digital skills necessary for full participation in life in the digital age. Heartland forward provides community broadband planning support to local leaders in collaboration with the Benton Institute for Broadband & Society and State partners. Heartland Forward also supports American Connection Corps fellows in several heartland communities and drives participation in the Affordable Connectivity Program through local awareness and enrollment outreach.

National Digital Inclusion Alliance

NDIA bridges the community of digital inclusion practitioners and policymakers by providing a unified voice advocating for broadband access, devices, digital skills training, and tech support. Working collaboratively, NDIA crafts, identifies, and disseminates resources and tools to help digital inclusion programs increase their impact.

INTERNET FOR ALL

