# INTERNET FOR ALL

U.S. Department of Commerce

National Telecommunications and Information Administration

# Digital Equity Model Plan Guidance

## Introduction

This document will help Administering Entities (AE) within the State Digital Equity Planning Grant Program to understand the standards NTIA will be using to review and evaluate State Digital Equity Plans. Plans will be evaluated for completeness in compliance with the State Digital Equity Planning Grant Notice of Funding Opportunity (NOFO) as well as applicable statutes, regulations, and agency policies and procedures.

The first column of the model plan guidance below states the Program requirements as written in the NOFO. The "Basic Program Requirements" section elucidates how Plan reviewers at NTIA will determine that a State has met each minimum statutory and programmatic requirement. Please refer to the Digital Equity (DE) Plan Standards of Review for more information on meeting basic program requirements. The "Model Plan" section provides illustrative insight into how State Digital Equity Plans can be constructed **but are not additional requirements for the State Digital Equity Planning Grant Program or final guidelines for the State Digital Equity Capacity Grant Program.** Finally, the "Risks to Plan Implementation" section details Plan features that may undermine achievement of the goals of the Digital Equity Act.

States should aim to tell a cohesive story that amplifies the experiences and needs of Covered Populations in their Digital Equity Plans in which clear connections are drawn between the barriers identified, data collected through the needs assessment, measurable objectives, and implementation strategy. NTIA has developed and released a variety of Technical Assistance resources to support States and Territories in the development of their Digital Equity Plans. This includes Digital Equity Plan External Best Practices, which provides examples of existing digital equity plans and programs across the country that align with each of the Digital Equity Plan requirements.

| NOFO Requirements<br>Program requirements as written in NOFO Section IV.C.b. | Basic Program Requirements<br>Whether the plan component as written meets the minimum standard. | Model Plan<br>Sample Plan components that may lead to successful implementation *beyond Program compliance*. | Risks to Plan Implementation<br>Plan features that may undermine achievement of the goals of the Digital Equity Act. |
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| **Statutory Requirements** | | | |
| **Requirement 1**<br>Identification of barriers to digital equity faced by Covered Populations in the State:<br>1. Individuals who live in covered households (i.e., low-income households);<br>2. Aging individuals; | • If the DE Plan includes at least one barrier for each of the 8 Covered Populations, then the requirement <u>has been met.</u><br>• If one or more Covered Populations does not have a barrier identified, then the requirement <u>has not been met</u>. | • There is an explanation of and insight into root cause(s) of the barrier.<br>• There is more than one barrier recognized for a given Covered Population.<br>• Methods of identification (e.g., direct community outreach, secondary data collection) are included. | • There is a selective or unbalanced focus on certain Covered Populations (i.e., if only a selection of Covered Populations is addressed as compared to the total Covered Populations within the state).<br>• Identified barriers do not represent the overlap in experiences of Covered |

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| 3. Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;<br>4. Veterans;<br>5. Individuals with disabilities;<br>6. Individuals with a language barrier, including individuals who—<br> a. Are English learners; and<br> b. Have low levels of literacy;<br>7. Individuals who are members of a racial or ethnic minority group; and<br>8. Individuals who primarily reside in a rural area | Notes:<br>• If a State claims that no members of a Covered Population reside within the State, the matter must be escalated for review.<br>• If the DE Plan states that a barrier is faced by more than one of the Covered Populations, then that barrier is counted for those multiple Covered Populations.<br>• A barrier to digital equity for a Covered Population is considered included if:<br> o The DE Plan states that the barrier is faced by that Covered Population specifically, or<br> o The DE Plan states that the barrier is faced by all Covered Populations in the State. | • There is supporting data and information that can be tracked and collected as States implement their DE Plans.<br>• The DE Plan provides an evidence-based explanation of the relationship between shared barriers to digital equity faced by Covered Populations in the State.<br>• The DE Plan explains how the State will establish relationships or partnerships between staff and Covered Populations.<br>• A clear connection is established between identification of barriers and:<br> o Measurable objectives [_Statutory Requirement 2_]<br> o Implementation strategy [_Programmatic Requirement 11_]<br>• The DE Plan demonstrates awareness that "one size does not fit all" – namely that the barriers and needs of each Covered Population are unique, and that even the needs of a single Covered Population across different geographies or communities might vary. | Populations and the nuanced challenges faced across and within Covered Populations, resulting in incomplete barrier identification that may hinder efforts to foster meaningful digital inclusion. |

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| | | • There is an assessment of how intersectionality between Covered Populations can compound barriers (e.g., the barriers faced by a person with disabilities and a language barrier may be unique from those faced by a person with disabilities without a language barrier). <br><br> • The DE Plan gathers qualitative data (i.e., storytelling) that captures narratives that cannot be translated from quantitative data. | |
| **Requirement 2** <br> Measurable objectives for documenting and promoting, among each Covered Population located in that State: <br> a. The availability of, and affordability of access to, fixed and wireless broadband technology <br> b. The online accessibility and inclusivity of public resources and services <br> c. Digital literacy <br> d. Awareness of, and the use of, measures to secure the online | • If at least one measurable objective is included for all 8 Covered Populations located in that State and for all five items (a) – (e) (including all sub-components), then the requirement <u>has been met</u>. <br><br> • If a measurable objective is missing from a Covered Population located in that State and an item or sub-component, then the requirement <u>has not been met</u>. <br><br> Notes: | • Measurable objectives are informed by a quantitative baseline as defined in the Needs Assessment [*Programmatic Requirement 7*]. <br><br> • There is a clear connection between measurable objectives and: <br>     ○ The State's vision for digital equity [*Programmatic Requirement 6*] <br>     ○ Identification of barriers [*Statutory Requirement 1*] | • There is a selective or unbalanced focus on certain Covered Populations (i.e., only a selection of Covered Populations is addressed as compared to all Covered Populations within the state). <br><br> • There is a selective or unbalanced focus on certain measurable objectives over others. <br><br> • The objectives are not clearly measurable. <br><br> • The objectives are not achievable in stated timeframe or would be impossible to |

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| privacy of, and cybersecurity with respect to, an individual; and<br>e. The availability and affordability of consumer devices and technical support for those devices | • "Measurable objectives" are defined as being future-focused and anchored to a quantifiable result (e.g., Key Performance Indicators (KPIs) or SMART goals).<br>• If the DE Plan states that an objective is for more than one of the Covered Populations, then that objective is counted for those multiple Covered Populations. Objectives do not need to be unique to a Covered Population or items (a) – (e).<br>• A measurable objective for a Covered Population is considered included if:<br>  o The DE Plan states that the objective is intended for that Covered Population specifically, or<br>  o The DE Plan states that the objective is intended for all Covered Populations in the State. |   o Implementation strategy [*Programmatic Requirement 11*]<br>• There are established standardized frameworks such as Key Performance Indicators (KPIs) or SMART goals that allow for tracking progress of implementation on the short-, medium-, and long-term.<br>• While an objective may seek to address more than one Covered Population, the DE Plan demonstrates awareness that "one size does not fit all" – namely that because the barriers and needs of each Covered Population and community may vary, so too will the strategy, implementation, and measurable objectives.<br>• Measurable objectives were developed based on impacts to the social determinants of health. | evaluate progress towards achieving objective. |
| **Requirement 3**<br>An assessment of how the measurable objectives identified in | • If all five items are mentioned for each Covered Population in the | • The DE Plan connects the State's broader goals and outcomes to relationships or | • There are few to no connections between measurable objectives. identified in *Statutory* |

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| *Statutory Requirement 2* above will impact and interact with the State's:<br>a. Economic and workforce development goals, plans, and outcomes<br>b. Educational outcomes<br>c. Health outcomes<br>d. Civic and social engagement; and<br>e. Delivery of other essential services | assessment, then the requirement has been met.<br>• If one or more of the five items are not mentioned in the assessment for one or more of the Covered Populations, then the requirement has not been met.<br><br>Notes:<br>• "[O]ther essential services" can include utility services (e.g., water, gas, electricity), banking and financial services, childcare services, parks and recreation services, food and agriculture, manufacturing, tourism, public works, public service announcements, and law enforcement and safety services. | partnerships with relevant State agencies advancing those goals and outcomes.<br>• Anticipated changes in State's priorities for the economy, workforce, education, health, civic and social engagement, and essential services are documented.<br>• The assessment of interaction between the plan's measurable objectives and the State's broader goals and outcomes includes a breakdown of how all Covered Populations will be impacted.<br>• The assessment of interaction between the plan's measurable objectives and the State's broader goals includes references to existing plans and goals, such as the State's workforce plan.<br>• The assessment identifies areas in items (a) – (e) where digital equity objectives could be incorporated, including concrete steps to incorporate goals.<br>• There is a narrative for establishing a baseline for items (a) – (e). | *Requirement 2* and State's broader equity goals.<br>• The measurable objectives aren't directly connected to digital equity when pulling from already established plans across the State (e.g., workforce, health, etc.).<br>• There is a selective or unbalanced focus on certain measurable objectives over others, including where measurable objectives reference certain Covered Populations over others. |

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| **Requirement 4**  In order to achieve the measurable objectives identified in *Statutory Requirement 2*, a description of how the State plans to collaborate with key stakeholders in the State.[1] | • If a description of how the State plans to collaborate with key stakeholders is provided, then the requirement has been met:   o Community anchor institutions;  o County and municipal governments;  o Local educational agencies;  o Where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;  o Nonprofit organizations;  o Organizations that represent—   ▪ Individuals with disabilities, including organizations that represent children with disabilities;  ▪ Aging Individuals; | • Collaboration is planned with:   o Members of Covered Populations who have direct lived experience with being disconnected;  o Community Anchor Institutions;  o State agencies;  o Labor unions and other organizations that represent workers;  o Digital inclusion coalitions;  o Libraries;  o Chambers of commerce;  o Industry associations;  o Public housing resident associations;  o Healthcare systems and networks;  o Homeless continuum of care providers; | • There is a lack of alignment and collaboration that limits buy-in to investments in digital equity.  • There is selective engagement or collaboration that could create unbalanced focus on certain stakeholder groups or Covered Populations and cause distrust from certain communities in the DE Plan or could overlook ideas or opportunities for DE Plan implementation. |

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[1] Key stakeholder in the state may include: a. Community anchor institutions; b. County and municipal governments; c. Local educational agencies; d. Where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations; e. Nonprofit organizations; f. Organizations that represent— i. Individuals with disabilities, including organizations that represent children with disabilities; ii. Aging Individuals; iii. Individuals with language barriers, including— 1. Individuals who are English learners; and 2. 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; g. Civil rights organizations; h. Entities that carry out workforce development programs; i. Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State; j. Public housing authorities in the State; and k. A partnership between any of the entities described in clauses (a) through (k).

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| | ▪ Individuals with language barriers, including—<br><br>• Individuals who are English learners; and<br><br>• Individuals who have low levels of literacy;<br><br>▪ Veterans;<br><br>▪ Individuals in that State who are incarcerated in facilities other than Federal correctional facilities;<br><br>o Civil rights organizations;<br><br>o Entities that carry out workforce development programs;<br><br>o Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;<br><br>o Public housing authorities in the State; and | o Multi-family housing developers and owners;<br><br>o Faith-based institutions;<br><br>o Business owners;<br><br>o Foundations and funders;<br><br>o Early childhood and early intervention coordinators;<br><br>o Incarcerated and re-entry organizations;<br><br>o Minority serving institutions<br><br>o Educational institutions;<br><br>o Civil rights organizations;<br><br>o Nonprofits; and<br><br>o Internet service providers.[2]<br><br>• Collaboration is tailored to the needs of its respective key stakeholder groups (e.g., multi-media outreach, outreach in multiple languages).<br><br>• The collaboration plan provides clarity on how relationships are maintained and nurtured and can be leveraged for implementation of the Plan.<br><br>• The collaboration plan outlines how the State will solicit and incorporate continuous feedback from community-based | |

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[2] *See* NOFO at n.13.

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| | ○ A partnership between any of the entities described above.<br>• If a description of how the State plans to collaborate with key stakeholders is not provided, then the requirement <u>has not been met</u>.<br><br>Notes:<br>• If fewer than five key stakeholders are represented in the description, escalation and follow-up with the State are advised. | organizations and Covered Populations to adjust activities as needed. | |
| **Requirement 5**<br>A list of organizations with which the Administering Entity for the State collaborated in developing the Plan. | • If a list of organizations with which the Administering Entity for the State collaborated to develop the DE Plan is included and complete, then the requirement <u>has been met</u>.<br>• If a list of organizations with which the Administering Entity for the State collaborated to develop the Plan is not included or is incomplete, then the requirement has not been met. | • The list provides details of the collaboration(s), rationale for why the State collaborated with specific organization(s), and outcomes of the collaboration(s).<br>• Relationships are maintained and nurtured and can be leveraged for implementation of the Plan.<br>• Relationships are demonstrated not just with multiple organizations, but with multiple *types and sizes* of stakeholder organizations (i.e., States are collaborating not just with large national non-profits, but with | • The list includes only a few stakeholder groups showing cursory engagement with stakeholders in the State. |

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| | | regional players and particularly smaller, local community-based organizations and community anchor institutions who have more on-the-ground, local context of community needs).<br><br>• The list includes an inventory of the types of entities, number of engagements, Covered Populations served. | |
| **Programmatic Requirements** | | | |
| **Requirement 6**<br>A stated vision for digital equity. | • If the vision for digital equity is stated and defines digital equity within the context of the State, then the requirement <u>has been met</u>.<br><br>• If the vision for digital equity is not stated or does not define digital equity within the context of the State, then the requirement <u>has not been met</u>. | • The vision includes a near-term and long-term, aspirational vision for digital equity within the State.<br><br>• A public statement, such as a press release, is issued on the State's vision that communicates its commitment to digital equity. | • A vague vision that is not actionable could cause confusion on the State's priorities, leading to inefficiencies in plan implementation. |
| **Requirement 7** | • If the DE Plan includes a needs assessment that satisfies all | • The digital equity needs assessment is consistent with the barriers identified in *Statutory* | • The needs assessment relies on unclear data that could create |

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| A digital equity needs assessment, including a comprehensive assessment of the baseline from which the State is working and the State's identification of the barriers to digital equity faced generally and by each of the Covered Populations in the State | three sub-requirements, then the requirement <u>has been met</u>.<br><br>  o  Comprehensive assessment of the State's baseline, which is a quantitative assessment of the State's current status for all sub-bullets of *Statutory Requirement 2*.<br>  o  Barriers to digital equity faced by all of the State's Covered Populations.<br>  o  Barriers to digital equity faced by the State's general population.<br><br>• If one or more sub-requirements are not met, then the requirement <u>has not been met</u>:<br><br>Notes:<br>• If Requirement 1 is not met, then Requirement 7 cannot be met.<br>• A "comprehensive assessment of the baseline from which the State is working" must contain a quantitative measure of the State's current state as it relates to all items and sub-items (a) – (e) as listed in Requirement 2; if the DE Plan does not contain a baseline measure for all items | *Requirement 1* and provides deeper explanation and insight related to root causes and other factors.<br><br>• There is evidence of a wide use of data sources, such as NTIA Internet Use Survey, American Community Survey, FCC Broadband Availability Map, the Census DE tool, additional State-specific data, local data, and primary research.<br>• There is a clear baseline that the State can use to measure progress for plan implementation (i.e., conducting digital inclusion activities to achieve digital equity).<br>• Data collected from collaboration with other organizations [*Statutory Requirement 5*] is included in the needs assessment and reflects comprehensive understanding of needs that reflect the voices of key constituencies in the State.<br>• The DE Plan includes baseline data and indicators around current quality of life dimensions (e.g., unemployment rates, educational attainment, average wages) and states how the | challenges for assessing progress on an ongoing basis.<br>• Needs assessment displays selective or unbalanced focus on certain Covered Populations (i.e., only a selection of Covered Populations is addressed as compared to all Covered Populations within the state). |

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|  | and sub-items of Requirement 2, then the sub-requirement for a comprehensive assessment is not met. | Digital Equity Plan aims to "move the needle" on these quality-of-life dimensions.<br>• Qualitative data (e.g., personal storytelling) from members of Covered Populations is included to enrich quantitative data collection.<br>• The needs assessment provides methodology and sources used to collect and analyze data. |  |
| **Requirement 8**
An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the Covered Populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments. | • If the DE Plan includes an asset inventory that satisfies both sub-requirements, then the requirement <u>has been met</u>:<br>  o Resources, programs, and strategies that promote digital equity for each Covered Population.<br>  o List of existing digital equity plans and programs among municipal, regional, and Tribal governments.<br>• If one or more sub-requirements are not met, then the requirement <u>has not been met</u>.<br><br>Notes:<br>• To meet the first sub-requirement, a State should | • The inventory of assets that allows for cross-collaboration and greater reach of implementation strategy via alignment and partnerships.<br>• There is a description of current digital equity resources, programs, and strategies, including a breakdown of which Covered Populations they serve.<br>• There is a description of current digital equity resources, programs, and strategies, including their administrator or funding entity.<br>• There is a description of existing digital equity plans and programs and whether they are overseen | • The asset inventory inadequately captures existing assets in the State with notable omissions of key groups, Tribal governments (where applicable), and/or one or more Covered Population. |

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| | provide a full and accurate listing of all resources, programs, or strategies it currently has in place, addressing each of the 8 Covered Populations. However, if an asset is not listed for one or more Covered Population(s), then the State should indicate that there is not an asset for that Covered Population and that the State will address this moving forward. This counts as identifying an asset and meets the requirement.<br><br>• The fact that one or more Covered Populations does not have a resource, program, or strategy identified does not necessarily indicate that the requirement has not been met.<br><br>• The DE Plan may state that a State does not currently have resources, programs, or strategies in place to promote digital equity for one or more Covered Populations. In such a situation, escalation is advised for closer review.<br><br>• The DE Plan might mention that a resource, program, or strategy is intended for more than one or all of the Covered Populations, | by municipal, regional, or Tribal governments.<br><br>• Information is included about existing state policies, mapping, and other technological resources used to inform broadband-related activities.<br><br>• There is evidence of Tribal consultations or conversations held to understand existing assets from Tribal governments, including state-recognized Tribes, as applicable.<br><br>• There is evidence that any Tribal consultations conducted related to the BEAD Program included a digital equity component that feeds an understanding of existing digital equity assets or lack thereof.<br><br>• There is a clear connection between individual assets outlined in the inventory, the Digital Equity Plan, and the State's implementation strategy [_Programmatic Requirement 11_], allowing State to leverage existing assets in plan implementation. | |

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| | in which case the asset is counted for those multiple Covered Populations.<br><br>• A digital equity resource, program, or strategy for a Covered Population is considered included if:<br>   ○ The DE Plan states that the resource, program, or strategy is intended for that Covered Population specifically, or<br>   ○ The DE Plan states that the resource, program, or strategy is intended for all Covered Populations in the State.<br><br>• If the DE Plan states that no digital equity plans or programs among municipal, regional, and Tribal governments exist, then the second sub-requirement does not have to be met to satisfy the overall requirement. | | |
| **Requirement 9**<br><br>To the extent not addressed in connection with *Statutory Requirement 4* above, a coordination and outreach strategy, including opportunities for public comment by, collaboration with, and ongoing | • If a Plan includes a coordination and outreach strategy and details opportunities for **all** three of the following methods for the **Covered Populations** within the State and for the **full range** of stakeholders within the State, | • There are established relationships or partnerships between the State and Covered Populations.<br><br>• There is a description of how relationships will be maintained and nurtured and can be | • There is a selective or unbalanced focus on certain Covered Populations (i.e., only a selection of Covered Populations is addressed as compared to all Covered Populations within the state). |

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| engagement with representatives of each category of Covered Populations within the State and with the full range of stakeholders within the State. | then the requirement <u>has been met</u>:<br><br>    o  Public Comment<br>    o  Collaboration<br>    o  Ongoing Engagement<br><br>• If one or more of the methods are not included for one or more of the Covered Populations or stakeholder groups, then the requirement <u>has not been met</u>.<br><br>Notes:<br><br>• The coordination and outreach strategy described in Requirement 9 is an expansion of Requirement 4, so the collaboration with Covered Populations and with certain stakeholders could be captured by Requirement 4.<br><br>• The coordination and outreach strategy does not need to be limited to the methods and stakeholder groups included in the chart above, but it should include those at a minimum.<br><br>• If the DE Plan states that Indian Tribes, Alaska Native entities, or Native Hawaiian organizations do not exist in the State, then coordination and outreach with | leveraged for implementation of the DE Plan.<br><br>• Plans and structures are in place for ongoing collaboration and engagement with key organizations, including specifically, mechanisms for gathering and incorporating feedback directly from members of Covered Populations and their respective communities.<br><br>• Plans and structures are in place for providing updates to Covered Populations and their respective communities on Plan development and implementation progress.<br><br>• There is an explanation of how the State will build or is building partnerships with all Covered Populations of the State and the full range of stakeholders within the State.<br><br>• Details are included about public comment opportunities (e.g., town halls, listening sessions) as well as planned and completed collaborations.<br><br>• There is a description of how coordination and outreach is devised to reach Covered | |

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|  | that stakeholder group may not be required, dependent on the Reviewer's independent validation (e.g., List Act Tribes) of the State's claim. If the DE Plan states that Indian Tribes, Alaska Native entities, or Native Hawaiian organizations do not exist in the State, but the Reviewer finds that they do and have not been addressed by the DE Plan, then the requirement has not been met.<br><br>• The DE Plan may state that a method will be employed for more than one of the stakeholder groups, in which case it is counted for those multiple stakeholder groups.<br><br>• A Covered Population is considered to be included in the coordination and outreach strategy if:<br>   o The DE Plan states that the coordination and outreach method is for that Covered Population specifically, or<br>   o The DE Plan states that the coordination and outreach method is for all Covered Populations in the State. | Populations based on their unique characteristics.<br><br>• The detail of coordination and outreach strategy provides information on all outreach efforts made, including ones that did not yield responses, to display wide-ranging efforts to engage deeply with Covered Populations. |  |

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| **Requirement 10**<br><br>A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan | • If the DE Plan describes how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan, then the requirement <u>has been met</u>.<br>• If the DE Plan does not describe how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan, then the requirement <u>has not been met</u>.<br><br>Notes:<br>• If the DE Plan states that no digital equity plans among municipal, regional, and/or Tribal governments exist, then the requirement does not have to be met. The reviewer should check "Yes" to indicate that all requirements are met. | • There is a method of identifying municipal, regional, and/or Tribal digital equity plans, including the entities contacted.<br>• There is alignment with other efforts in the State, which increases stakeholder buy-in and avoids duplication of efforts.<br>• Further detail is included as to how the State will engage with municipalities, regions, or Tribes it has awareness of that are not yet represented by the Plan.<br>• Details are included about collaborations or partnerships between owners of respective digital equity plans. | • There are clear omissions of existing digital equity plans, which could introduce inefficiencies, overlapping efforts, and tensions between various plans competing to achieve digital equity in different ways. |
| **Requirement 11**<br><br>An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should | • If the DE Plan includes an implementation strategy that satisfies the sub-requirements below relative to Covered Populations located within a State, then the requirement <u>has been met</u>: | • Mechanisms for plan sustainability are in place that would allow the State to develop it with the Digital Equity Capacity Grant Program.<br>• There are specific activities and clear roles and responsibilities, which allow the State to prepare | • Not including measures for sustainability will hinder any DE Plan evolvement required for progress in future years<br>• The DE Plan underestimates the resources necessary to implement. |

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| • Establish measurable goals, objectives, and proposed core activities to address the needs of Covered Populations;<br>• Set out measures ensuring the plan's sustainability and effectiveness across State communities, and<br>• Adopt mechanisms to ensure that the plan is regularly evaluated and updated. | a. Measurable goals and objectives,<br>b. Proposed core activities,<br>c. Measures to ensure the plan's sustainability, and<br>d. Mechanisms to ensure plan is regularly evaluated and updated.<br><br>• If one or more of the sub-requirements are not included, then the requirement has not been met.<br><br>Notes:<br>• If Requirement 2 is met, then the first sub-requirement (measurable goals and objectives) has been met.<br>• Digital world includes, but is not limited to:<br>  o Affordability<br>  o Devices<br>  o Digital Skills<br>  o Technical Support<br>  o Digital Navigation<br>• If Requirement 2 is not met, then Requirement 11 cannot be met. | a thorough and precise application for the Digital Equity Capacity Grant Program.<br>• The implementation strategy incorporates all 3 sub-requirements (a)-(c) and takes a holistic approach to the barriers faced by all Covered Populations in the State.<br>• There is a clear connection to the needs assessment [*Programmatic Requirement 7*] and the asset inventory [*Programmatic Requirement 8*], presenting actionable solutions to bridge the gap between the current state of existing barriers and the future vision for digital equity in the State.<br>• Roles and responsibilities (of staff and consultants) are clearly defined in the implementation strategy.<br>• A system for data collection is included to measure efficacy of DE Plan implementation and digital inclusion efforts that can be compared with the baselines set by the needs assessment [*Programmatic Requirement 7*] and the progress towards achieving measurable objectives | • No clear connection to the needs assessment [*Programmatic Requirement 7*] and the asset inventory [*Programmatic Requirement 8*], leading to a disjointed DE Plan.<br>• The implementation strategy is not specific or achievable.<br>• The implementation strategy does not incorporate coordination between partners to ensure efficient use of funds and limit duplicative efforts.<br>• The implementation strategy does not promote meaningful use of devices. |

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| | | defined in _Statutory Requirement 2_ and _Statutory Requirement 3._<br><br>• The DE Plan clearly outlines a long-term strategy and approach for how the State will leverage the DE funding to build foundational capacity (partnerships, programming, delivery networks, etc.) so that digital equity efforts can continue beyond just the DE-funding period.<br><br>• Goals, processes, and priorities anticipated for distributing money under the State Digital Equity Capacity Grant Program are included.<br><br>• The implementation strategy priorities account for sustainability beyond the period of the Digital Equity Capacity Grant Program. | |
| **Requirement 12**<br>An explanation of how the implementation strategy addresses gaps in existing state, local, and private efforts to address the barriers identified in _Statutory Requirement 1 above_ | • If all sub-requirements of the explanation are included, then the requirement has been met.<br><br>• If one or more of the sub-requirements are not included, then the requirement has not been met. | • There is a tailored approach to bridging gaps for Covered Populations that is sensitive to those historically underserved by state, local, and private efforts.<br><br>• The existing state, local, and private efforts to address the barriers identified are described. | • The DE Plan contains an unaddressed gap that could grow and widen the gap between the baseline and vision for digital equity. |

| NOFO Requirements | Basic Program Requirements | Model Plan | Risks to Plan Implementation |
|---|---|---|---|
| Program requirements as written in NOFO Section IV.C.b. | Whether the plan component as written meets the minimum standard. | Sample Plan components that may lead to successful implementation *__beyond Program compliance__*. | Plan features that may undermine achievement of the goals of the Digital Equity Act. |
| | Notes:<br>• The explanation should provide a description as to how the implementation strategy will close or lessen gaps in existing efforts as they relate to existing barriers of Covered Populations in the State. | • Findings from the needs assessment [*Programmatic Requirement 7*] and the asset inventory [*Programmatic Requirement 8*] are clearly articulated to support the explanation.<br>• The DE Plan, implementation strategy, and activities proposed demonstrate an understanding of both the unique needs of each Covered Population and that even within one single Covered Population, the needs and barriers might vary by geography or local community (i.e., "One size does not fit all"). | |
| **Requirement 13**<br>A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with:<br>a. Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations;<br>b. Labor organizations and community-based organizations; and | • If a description is provided and all three types of organizations are represented in the description (with specific descriptions for how it will engage with the organizations identified in items (a) – (c)), then the requirement has been met.<br>• If a description is missing or one or more of the types of organizations are missing from the description, then the requirement has not been met. | • There is alignment with other efforts in the State, which increases stakeholder buy-in and avoids duplication of efforts.<br>• Relationships are maintained and nurtured and can be leveraged for implementation of the Plan.<br>• The description includes explanation of how engaging or partnering with items (a) – (c) will align with items (a) – (c) of *Programmatic Requirement 11*.<br>• The description aligns with *Statutory Requirement 3* by | • Engagement with workforce, labor, and educational agencies is limited to the largest, which could restrict effectiveness of plan implementation. |

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|---|---|---|---|
| Program requirements as written in NOFO Section IV.C.b. | Whether the plan component as written meets the minimum standard. | Sample Plan components that may lead to successful implementation *beyond Program compliance*. | Plan features that may undermine achievement of the goals of the Digital Equity Act. |
| c. Institutions of higher learning, including but not limited to four-year colleges and universities, community colleges, education and training providers, and educational service agencies. | | explaining how engagement or partnership with each group builds upon the State's economic, workforce, and educational goals.<br><br>• The description includes how the State intends to ensure cross-pollination between State's existing plans developed by other agencies and organizations.<br>• The description reflects the full range of institutions of higher learning in the state, including minority serving institutions. | |
| **Requirement 14**<br>A timeline for implementation of the plan. | • If the DE Plan includes a timeline for implementation that satisfies both sub-requirements, then the requirement <u>has been met</u>:<br>  o Start date, end date, and all major implementation milestones and<br>  o Sufficient detail to demonstrate a realistic, actionable, and measurable implementation timeline.<br>• If the DE Plan does not include a timeline for implementation or one or more of the sub-requirements are missing, then | • Details of timing for each proposed core activity are included.<br>• Major milestones are included, such as when key measurable objectives will be achieved.<br>• The timeline outlines specific metrics targets / milestones, covering both outcomes expected in the "Short-Term" (Less than 1 year) *and* "Long-Term" (1+ years). For example, short term milestones and metrics might be more focused around building capacity for Digital Equity efforts, and long-term metrics might be targeted | • The implementation timeline is not realistic or achievable and does not include flexibility for potential delays. |

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| | the requirement <u>has not been met</u>.<br><br>Notes:<br>• Sufficient detail includes tangible milestones that are aligned to stated goals and objectives within a realistic timeframe. | towards the number of members of Covered Populations who have completed digital literacy trainings, Internet adoption metrics, etc.<br>• Potential impacts to timeline are included, such as potential delays or risks.<br>• The baseline is demarcated, and timeline reflects closing the gap between current state (barriers and needs) via use of assets to bring the State closer to its vision for digital equity. | |
| **Requirement 15**<br>A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the Broadband Equity, Access, and Deployment Program, or other federal or private digital equity funding. | • If the DE Plan includes a description of how the State will coordinate its use of Digital Equity Capacity funds with BEAD funding and with other federal or private funding (as applicable), then the requirement <u>has been met</u>:<br>   o Broadband, Equity, Access, and Deployment (BEAD) Program funding; and<br>   o As applicable, with other federal or private funding.<br>• If the DE Plan does not include a description of how the State will coordinate its use of Digital Equity Capacity funds with | • There is a clear coordination of funds, which enables cross-pollination of efforts and a more holistic approach to problem-solving.<br>• The DE Plan draws clear connection to the BEAD Five-Year Action Plan.<br>• The DE Plan clarifies how its objectives align with, overlap, or interact with that of other funded digital equity programs in the State.<br>• The DE Plan incorporates findings from the asset inventory and the collaboration and stakeholder engagement strategy | • There is a lack of alignment that may result in redundant efforts<br>• Resources may be inadequately utilized across programs that are doing the same or similar work.<br>• Lost track of digital equity funding in the State could introduce duplication of efforts and overall dilution of digital inclusion efforts over the long term. |

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| | BEAD funding and with other federal or private funding (as applicable), then the requirement <u>has not been met</u>.<br><br>Notes:<br>• A State might not receive other federal or private digital equity funding besides that from BEAD; therefore, that box does not need to be checked for the requirement to be met. | to identify commonalities, goals, efforts, and gaps across the State. | |
| **Public Comments** | | | |
| **Requirement 16[3] 16**<br>A description of any changes made to the Digital Equity Plan in response to comments received and inclusion of a written response to each comment received. | • If the DE Plan includes a Record of Public Comments and Actions Taken that satisfies the sub-requirements above, then the requirement <u>has been met</u>.<br>• If one or more of the sub-requirements are missing or if there is no Record of Public Comments and Actions Taken submitted, then the requirement <u>has not been met</u>.<br><br>Notes: | • The DE Plan incorporates changes made in response to comments received through the Request for Comment process and provides a rationale behind why feedback was included or not as contemplated in Section 60304(c)(2)(B)(i)(II) of the Infrastructure Investment and Jobs Act (IIJA).<br>• The comments included are reflective of the voices that represent members of Covered Populations. | • The comments were incorporated without an eye towards the voices of Covered Populations.<br>• The comments incorporated are not reflective of the State's makeup but rather of the most prominent voices. |

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[3] *See* NOFO at Section I.A and Section 60304(c)(2)(B)(i)(II) of the Infrastructure Investment and Jobs Act (IIJA).

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| | • Each comment received must be addressed in writing and submitted to NTIA.<br>• As long as the State shows that it has addressed every comment received, the State has fulfilled the requirement. | | |