Re: Digital Equity Act of 2021 Request for Comments, Docket No. NTIA-2023-0002

On behalf of UnidosUS (formerly known as National Council of La Raza), we write in response to the National Telecommunications and Information Administration’s (NTIA) request for public comment concerning implementation of the Digital Equity Act of 2021 (NTIA-2023-0002; Docket 2023-04242).

UnidosUS is the nation’s largest Hispanic civil rights and advocacy organization. Through its unique combination of expert research, advocacy, programs, and an Affiliate Network of nearly 300 community-based organizations across the United States and Puerto Rico, UnidosUS simultaneously challenges the social, economic, and political barriers at the national and local levels. In preparation for these comments, UnidosUS policy staff conducted three listening sessions with UnidosUS Affiliates engaged in digital equity programming and NTIA Digital Equity staff, including Federal Program Officers. These sessions took place between February 2023 and April 2023. The feedback shared by Affiliates is incorporated in these comments and readouts from these sessions can be found in Appendix D.

The COVID-19 pandemic changed the course of daily life and the ways in which we use and interact with technology. Practically overnight, we transitioned online, highlighting our growing dependence on access to stable and affordable home internet. Regardless of the pandemic, it has been true for nearly a decade that equal access to healthcare, education, employment, civic participation, information and news, and essential government services depend on access to the internet. But internet connectivity is not enough: the connection must be stable, there must be access to appropriate and capable devices like a laptop or desktop, and access to high-quality technical support and digital skills are both critical.

In other words, stable, high-speed internet is a prerequisite for nearly every dimension of daily life. Its absence worsens longstanding inequities by erecting additional barriers to participation and engagement. For this reason, UnidosUS joins others in defining digital equity as the condition in which all individuals and communities have the technological capacity they need to fully participate in our society, democracy, and economy.

For Latino and immigrant communities, digital equity is a core civil rights priority. UnidosUS is committed to reducing the digital divide and ensuring that all communities, particularly those who are un-and-underserved, have the technological capacity they need to fully participate in our society, democracy, and economy. Just prior to the pandemic, about 18 million Latinos lacked home broadband. By March 2021, that number grew to 21 million—only 65% of Latinos reported having home internet, compared with 80% of Whites, and 71% of Blacks.

Access to devices also continues to pose barriers to broadband adoption, with only 67% of Latino and 69% of Black households owning a laptop or desktop computer, compared with 80% of their White counterparts. These gaps prevent the technological upskilling for Latinos and limit their digital literacy,
which compounds the basic need for connection and further moves Latinos away from opportunities and supports.

These comments outline how the NTIA can structure, implement, and oversee Digital Equity Act programs in ways that prioritize investment in the most marginalized and disproportionately disconnected communities, with an emphasis on the needs of Latino and immigrant communities. These two communities are part of the eight “covered population,” or priority, categories defined by the Digital Equity Act of 2021.

UnidosUS Responses to General Questions


Questions 1-2

As states are instructed to develop and implement digital equity plans to improve broadband access, affordability, and adoption among underserved “covered populations,” states should take into consideration the systemic barriers to connectivity faced by underserved communities. This includes placing add emphasis on addressing and investing in the unique needs of Latino and immigrant communities, both of which are overrepresented in the digital divide.

First and foremost, State Digital Equity Plans (SDEPs) should be developed in partnership with a wide range of diverse stakeholders that reflect the communities that are overwhelmingly represented in the digital divide. Early engagement with relevant stakeholders offers the opportunity to meaningfully establish inclusive goals and expected outcomes that respond to the state’s, and its communities’, unique digital access needs for underserved communities.

In other words, SDEPs should reflect a thorough understanding of who and where these disconnected communities are, what the specific needs and assets of the communities are, and how they will plan to work with Community Based Organizations (CBOs) to target the needs and support and grow the infrastructure. States should do this by using various sources of disaggregated data, including:

- U.S. Census and American Community Survey data,
- Broadband Data Maps\(^5\) generated and maintained by the Federal Communications Commission,
- Industry, academic, and institutional research data and analyses, such as Microsoft’s Digital Equity Data Dashboard\(^6\) or Education SuperHighway’s Affordable Connectivity Program (ACP) Enrollment Dashboard.\(^7\)

States also should consult stakeholders who work with low-income, communities of color, and non-native English speakers that have nuanced insights about community populations and connectivity. As a result of this stakeholder engagement, SDEPs should also reflect an understanding of why communities face barriers, including factors that affect access to stable and high-speed affordable home broadband, device and software access, and the levels of digital skills and knowledge within a district.

SDEPS should also identify root causes of the digital divide that are specific to their state, and methods of addressing the root causes. For example, U.S. Census data demonstrate a connection between
income level and broadband adoption at the national level. Research identifies "cost as the primary barrier" for un- and underserved communities’ access to home internet connection. SDEPs should therefore indicate how a plan is responsive to the issue of affordability.

Additionally, SDEPs should describe resource allocation and implementation planning for covered populations within each state. As noted in the Digital Equity Act, the digital divide disproportionately affects people of color, Indigenous peoples, households with low incomes, people with disabilities, people in rural areas, and older adults. When it comes to the Latino community, only 65% of households have broadband connection at home, compared with 71% of Black communities and 80% of White counterparts. To effectively address these disparities, SDEPs must demonstrate proportional levels of engagement and collaboration with CBOs that represent and work with communities that are overrepresented in the digital divide, such as Latinos.

In the community engagement plans outlined in SDEPs, outreach should be tailored towards target communities. For example, Spanish is the most common non-English language spoken within households in the U.S. To support and serve these communities, SDEPs should provide multilingual materials and information that is culturally appropriate and relevant.

They should also plan to leverage a community’s existing assets. For example, community anchor organizations typically have comprehensive toolkits equipped with multi-lingual capacity to tailor their outreach interventions to communities. For example, during the pandemic shutdowns, the Carlos Rosario International Public Charter School (CRIPCS), an UnidosUS Affiliate based in Washington D.C., worked with partners to supply program participants with laptops and learning tools at home to ensure they could continue bilingual digital literacy courses through a hybrid model. CRIPCS anticipated and knew firsthand that their community would need laptops and planned to expand the training of instructors to transition bilingual lessons online in ways that minimized pandemic-related disruption as much as possible.

States should invest more deeply in partnerships with community-based anchor organizations to create and disseminate multilingual materials. Such partnerships are also often the most efficient and effective ways to reach hard-to-reach communities, including Latinos, immigrants, and non-English speakers, since community navigator organizations often have pre-existing relationships with these households and already provide direct services, resource information, and other supports.

SDEPs should also include hybrid opportunities for both virtual and in-person strategy sessions and other kinds of community engagement and outreach activities. Hybrid opportunities can increase community-level participation and provide key information to inform the state digital equity planning. These hybrid engagements should be responsive to cultural contexts and should consider communities whose primary language is not English or that lack stable home internet, devices, or software that allow for virtual participation. By hosting a series of hybrid feedback sessions with multiple opportunities for engagement, NTIA and state teams would enhance state plans to include strategies to reach the hardest-to-reach digital redzones. Providing multiple opportunities and avenues of engagement demonstrates an inclusive approach to community engagement that acknowledges the competing demands of communities.

Engagement and outreach activities should also target in-person and online spaces that are most often frequented by underserved communities. Leveraging partnerships with CBOs and other anchor
institutions, states can identify locations that serve as core community centers for underserved populations—which often include the offices or spaces of CBOs themselves. When it comes to disseminating information, advertising a program or event, or other grassroots communications, CBOs are also often best positioned to connect with community stakeholders. In the context of Latino communities, households trend towards being mobile-first at higher rates than other demographics. This results in a reliance on social media and messaging services as primary sources of news and information. CBOs, who often host or are familiar with and participate in preferred local channels of communication, can provide states guidance on how best to maximize connection with local communities. At minimum, communications should be linguistically and culturally appropriate and can be disseminated through social media, WhatsApp, and AM radio, for example, to maximize targeted outreach to the hardest-to-reach Latino communities.

Finally, NTIA should also encourage states to integrate or scale and expand existing efforts to increase awareness, access and take-up of federal tools designed to close the digital divide, like the Affordable Connectivity Program (ACP). To the degree possible, ACP awareness campaigns should also be part of programs being supported by NTIA’s broadband grant programs.

B. State Digital Equity Capacity Grant Program Implementation: Accountability and Oversight of Implementation is Key to Keeping Plans Equitable for Latinos.

Questions 5-7

Under the State Digital Equity Capacity Grant Program, SDEP implementation should have and maintain strong ties to covered populations as defined by the Digital Equity Act. As described above, a comprehensive SDEP includes strategies that focus on stakeholders from communities most affected by the digital divide. Anchor organizations should be involved and supported throughout the capacity grant program.

SDEPs should demonstrate a clear and concise pathway that leads to program goals and projected outcomes collaboratively developed by community organizations and relevant stakeholders. This should include:

- Intentional collaboration with anchor organizations that provide meaningful leadership and influence in implementation planning and execution;
- Data collected and analyzed by these organizations to design and implement programming that connects communities to digital equity programs and services;
- Consistent engagement with community stakeholders and an efficient feedback mechanism to adjust planning as needed;
- An advisory committee of community stakeholders and representatives from digitally underserved communities.

As SDEP implantation is underway, open information sharing should be maintained to ensure best practices are accessible across all SDEPs. To support accessibility in the implementation phase, NTIA should require states to outline the following:

- A plan for data collection to track engagement with covered populations and measure outcomes.
- A plan that includes outreach strategies, partners and stakeholders engaged, and planned and completed events and materials.
- Lessons learned from unique outreach methods to connect communities to digital equity federal programs and the components of their success or a description of the challenges.

Finally, NTIA Federal Program Officers, state broadband offices, and representatives from key covered populations within the state should convene regularly to discuss implementation activities, progress on stated program goals and objectives, and ways to improve or enhance plan activities and programs considering learned experiences and feedback from ongoing implementation. Maintaining close contact and connection with stakeholders and partners participating in the SDEP implementation is key to ensuring that SDEPs are equitable, effective, and efficient in practice, in addition to name.

C. Digital Equity Competitive Grant Program: Competitive Grant Proposals Should Complement Planning and Capacity Plans.

Questions 8, 9, 11, 12

The Digital Equity Competitive Grant Program should support efforts in achieving digital equity alongside SDEPs, promote digital inclusion, and increase the sustainable adoption of internet use among covered populations with direct links to complementary federal programs, such as the ACP.

Grantees considered for the competitive grant program should demonstrate an understanding of, and clear ties to, the hardest-to-reach communities among covered populations. These grantees have methods of reaching households with intersectional (low-income, immigrant, and rural communities, for example) and overlapping barriers to equitable digital accessibility.

Program grantees should also prioritize investment in organizations and institutions that are community navigators, including those with staff with direct engagement with communities. CBOs, such as those in the UnidosUS Affiliate network, already offer key services, including financial coaching, prepared tax services, digital literacy trainings, public computer labs, public benefit enrollment, and more.

Grant funds can be used to scale and expand these offerings to include digital equity activities. Funds can also be used to stand up and create new digital equity-related programs that complement the existing suite of offerings. Finally, CBOs that have been addressing these capacity-building efforts creatively should be given opportunities by federal training and technical assistance programs to translate their learnings across grantees and states.


Questions 15-17, 19, 21

The UnidosUS Affiliate Network includes CBOs working to address the digital literacy and skills gap within Latino communities. The CBOs described below are partnered with UnidosUS and managed to continue impactful community programs despite challenges caused by the pandemic and limited funding and resource investment.
In its program design, the NTIA should make use of their community-informed digital equity and inclusion project models, as they respond to specific needs of Latino communities in addressing the digital divide:

- **The Association for the Advancement of Mexican Americans (AAMA) Work and Learn Center.** This Houston-based CBO recognizes the potential of young adults and the need to provide accessible and equitable digital skills training to Latino youth. Six-week programs for Design and Digital Literacy provide students with paid training in career readiness, web development, digital literacy, and graphic design. AAMA additionally offers personalized career counseling and opportunities to connect with employers to help students implement skills training outside of the classroom and take steps to achieve their individual goals.15

- **Encuentro’s Adult Education Programs**, serving Albuquerque, New Mexico, are developed through collaborations with local organizations that value and defend the rights of immigrants. With immigrants accounting for about one in six people in the United States, these communities are some of the largest over-represented groups caught in the digital divide with more than 33% of all immigrant workers not having **any** digital skills and 29% having **limited** digital skills.16 Encuentro’s program offers 16 online hybrid classes that incorporate digital literacy and skills-building across educational programs.17 Programs range in topics and various levels (beginner, intermediate, and advanced) such as English as a second language, computer training, and financial literacy. Enrollment in the programs offers one-on-one student support as well as childcare services for their in-person participants.18 The added benefit of tying childcare to digital skill-building overcomes a significant barrier for accessing digital literacy opportunities.

- **UnidosUS**, with support from various partners, administers and maintains the Digital Skills for Life (DS4L) program.19 DS4L, launched in 2019, has evolved into a multi-pronged program that responds to unique intersectional needs for Latinos to maximize their digital skills development. As of 2023, DS4L has supported program implementation by 40 unique CBOs across the nation. Examples include:
  - Hybrid digital coaching opportunities for Latinos with neurodivergences,20
  - Tailored courses for elderly participants with low levels of English proficiency,21
  - Multiple in-person and online avenues to support working parents with school-aged children to sharpen digital skills so that they can actively participate in interactions with their children’s schools, teachers, and other educational necessities.22

NTIA will also need to measure the success and transformative impact of the programs designed to improve digital equity, so creating a framework for monitoring, evaluation, and learning (MEL) will be critical. A systematic and objective way to track outcomes will be necessary to make data-driven decisions about how to make and implement improvements.

UnidosUS has developed numerous MEL tools based on USAID’s Activity MEL Plans that identify specific Latino-focused outcomes and indicators. UnidosUS programs also use elements of the Kirkpatrick model to inform their MEL plan developments (Annex A). Some samples of MEL-measured outcomes for UnidosUS digital equity programs that the NTIA should consider include:

- **Latinx in Business Program**: a program designed to provide digital upskill training for business owners and future entrepreneurs through a contextualized toolkit.23 The program’s MEL plan seeks to determine whether the program achieves the goals identified at the outset to
incorporate digital literacy training. MEL indicators determined that, out of 200 individuals who enrolled in the Latinx in Business Program, 160 individuals completed the program, and 150 individuals adopted digital solutions for their business operations.\(^{24}\) (Annex B: Latinos in Business Measurement, Evaluation, and Learning Plan).

- **Latinx @ Work**: an eight-to-10-week program aimed towards enhancing job-readiness with digital literacy skills-building and is being implemented by UnidosUS affiliates and partner organizations. This program is unique in that it targets participants who fall in the very low-, and low-income brackets; work in low-wage jobs; and whose limited digital literacy or job readiness skills prevent them from advancing in the workforce.\(^ {25}\) The MEL plan for this program includes specific reporting requirements for tools developed in Spanish. (Annex C: Latinx @ Work Measurement, Evaluation, and Learning Plan).

To improve digital literacy and skills in communities overrepresented in the digital divide, identifying and establishing short- and long-term benchmarks for both program participants and program hosts, can help measure progress. Examples of **short-term benchmarks** for digital skills program **participants** include:

- Upskilling in digital literacy and skills writ large, including proficiency in navigating email, programs like Microsoft word, and other common internet or digital platforms for day-to-day and basic employment or office-related activities.
- Increased navigation and comprehension using specifically relevant portals and software such as tele-health software, online banking systems, and other specific platforms.
- Increased confidence in sharing digital knowledge with others and advancing to higher profile digital skills such as coding and InDesign.
- Application of digital skills in day-to-day activities with minimal or very limited gaps or drop-off in digital platform use and navigation. In other words, participants report rarely, if ever, needing technical assistance to complete day-to-day tasks on common digital platforms.
- Participants report increased recognition of and familiarity with increased number of digital tools, programs, and platforms.

Examples of **short-term benchmarks** for digital skills **program hosts or grantees** include:

- Feeling adequately supported in program and curriculum design and implementation, such as:
  - Capacity and staffing, including with appropriately trained teachers and coaches,
  - Established benchmarks and outcomes,
  - Technical assistance in the form of affordable access to stable internet for the program host site, devices, software, and digital teaching tools,
- Greater ability to scale program offerings and trainings, including:
  - Adding teaching hours or components per program,
  - Expanding the number of participants or community members served,
  - Increasingly adding or transitioning participants to advanced training programs and technical certificate offerings.
- Better positioned to implement and maintain data collection and monitoring processes to capture and demonstrate achieved outcomes, metrics, and learnings.
- Grantees can meet the perceived needs of a community as they understand them.
Examples of long-term benchmarks for digital skills program participants include:

- Launching into better paying jobs with increased opportunities for career advancement and upward mobility,
- Growing and thriving in an evolving digital economy because of their newly honed digital skills,
- The ability of those participants who began digital skills programs without home internet and/or devices can secure and maintain both over time as a result of program support, increased income due to employment mobility, and/or complementary digital equity programs like the Affordable Connectivity Program (ACP).
- The ability to relay and assist household and family members and peers with learned technical and digital skills.
- An increase over time of the proportion of Latino community members with advanced digital technical skills, like coding and software design.

Examples of long-term benchmarks for digital skills program hosts or grantees include:

- Development and maintenance of best practices for implementation of digital skills and literacy programs tailored to the unique community needs of Latinos and immigrants.
- Scaling and expansion of digital navigator expertise across program host staff, including and beyond staff conducting skills programs.
- Increased fluency and expertise in evolving technological tools and increased integration of advanced technical tools in daily organizational operations and service offerings.
- Positioning of CBOs to act as digital rights advocates to share and disseminate developed best practices and learnings across diverse stakeholder groups.

An Activity MEL Plan also should include additional monitoring approaches unique to that specific activity, and that reflect the programmatic approach, operational context, and management needs. These suggestions can help inform NTIA digital equity grantees on best practices when assessing the effectiveness of their programs and to efficiently apply lessons learned to the programs for greater success.

E. Ensuring That Equity is Achieved in Broadband Equity, Access and Deployment (BEAD) Program

Question 22

For the Internet for All funding mechanisms authorized by the Infrastructure Investment and Jobs Act (IIJA), including the Digital Equity Act, it is in the program’s best interest to ensure that linkages between each funding mechanism are clear, adaptable, and inclusive. The BEAD program serves an important complementary role in championing the critical groundwork that will be used to deploy the digital equity programs discussed in this comment. Specifically, BEAD plays a unique role as it will provide job and workforce training opportunities. Many of these new employment opportunities will likely require upskilling, technical training, and other kinds of apprenticeships – each of which complement the same long-term goals of DEA programs outlined in sections A-D of this comment.

For this reason, BEAD grantees should be required to give priority access to workforce opportunities to the same covered populations identified in the DEA. For Latinos, who experienced some of these highest rates of job and income loss during the COVID-19 pandemic, BEAD workforce opportunities are the other side of the community-investment coin as the digital equity activities authorized by IIJA.
In May of 2020, at the peak of COVID-19 lockdowns, 61% of Latinos reported job losses or pay cuts due to the pandemic. Additionally, the five business sectors most affected by COVID-19-related shutdowns are the same ones that generated almost 50% of the revenues of all Latino-owned businesses: retail trade, construction, leisure and hospitality, transportation, and other services. The effects of the COVID-19 pandemic, coupled with the evolving landscape of the American workplace and workforce, means that Latinos workers, who are almost 20% more likely to lack a high school diploma compared with other ethnic and racial groups, will face a greater risk of job displacement due to automation and the integration of artificially intelligent tools.

BEAD has an opportunity to respond to this trend towards workplace automation and provide direct access to those communities that lose their sources of income because of it. SDEPs that require critical BEAD infrastructure must be inclusive about these communities and how they will strategically provide outreach methods like offering non-English job postings, non-internet-based job announcements, training and apprenticeships to skills workers, and multi-lingual job onboarding modules.

 Appropriately connecting BEAD plans with SDEPs can also help ensure that those regions and communities with the highest rates of disconnection are truly being prioritized for investment – maximizing the equitable outcomes of each program. SDEPs should outline how states determined which areas consist of people without access to viable broadband speeds, as opposed to those areas that do have access, but the majority consist of people who cannot properly adapt to internet use. The differentiation of these adoption-issue communities must be strategically rerouted to the ACP program, which is also written into the BEAD portions of the IIJA. This comparison of digital adoption issues and deployment issues will need to be clearly articulated in the SDEPs, particularly in those states with large or multiple connectivity and internet adoption deserts.

**Conclusion**

UnidosUS welcomes the opportunity to continue to support Digital Equity Act implementation to ensure that these grant programs adequately address the barriers that prevent Latinos and other communities of color from access the technological capacity they need to fully participate in our society, democracy, and economy.

Thank you for the opportunity to comment on this important issue. Please contact UnidosUS Senior Civil Rights Analyst, Claudia Ruiz, with any questions at cruiz@unidosus.org.

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1. UnidosUS Affiliate Network, [https://www.unidosus.org/about/affiliates/](https://www.unidosus.org/about/affiliates/).
3. Ibid.
7. Education Superhighway, Affordable Connectivity Program Enrollment Dashboard, [https://www.educationsuperhighway.org/no-home-left-offline/acp-data/](https://www.educationsuperhighway.org/no-home-left-offline/acp-data/).


15 Association for the Advancement of Mexican Americans (AAMA), https://www.aama.org/aamas-work-learn-center/.


17 https://encuentronm.org/2022/02/08/over-200-students-engaged-in-online-learning/

18 https://encuentronm.org/adult-education/


21 Ibid.

22 https://unidosus.org/blog/2023/03/16/digital-skills-for-life-program-empowers-latino-adults/


