



May 1, 2023

Stephanie Weiner, Acting Chief Counsel
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

RE: National Telecommunications and Information Administration Docket (NTIA-2023-04242)

Dear Acting Chief Counsel Weiner:

The Local Initiatives Support Corporation (LISC) thanks the National Telecommunications and Information Administration (NTIA) for the opportunity to provide comments on the [Digital Equity Act of 2021](#) to ensure all Americans have access to affordable, reliable, high-speed broadband as authorized by the [Bipartisan Infrastructure Law](#). LISC appreciates the NTIA's ongoing efforts to help close the digital divide and support digital equity efforts across the nation and encourages NTIA to continue engagement with stakeholders as rules develop.

Background on LISC

LISC is a nonprofit housing and community organization and certified Community Development Financial Institution (CDFI) with offices in 38 cities nationwide and a rural network encompassing 140 partners serving 49 states and Puerto Rico. LISC's work supports a wide range of activities, including affordable housing, digital inclusion, economic development, building family wealth and incomes, education, community safety, and community health. LISC mobilizes corporate, government, and philanthropic support to provide local community development and business development organizations with loans, grants, equity investments, capacity building, and technical assistance.

LISC has been implementing, evolving, and expanding digital upskilling and coaching models for over a decade, particularly through our [Financial Opportunity Center](#)[®] network. The FOC[®] model provides a cohesive suite of services that aims to broaden financial stability for people with low incomes and help form a more inclusive modern economy. The FOC[®] network provides employment and career counseling, one-on-one financial coaching and education and low-cost financial products that help build credit, savings and assets. This work intersects with digital equity as our partners provide community-based digital education and training to help the disconnected address home connectivity, develop new digital skills, access occupational specific training, and access affordable financial services online. For over 25 years, LISC's rural program has also provided dedicated support to rural communities and partners with 145 rural community-based organizations in more than 2,200 counties. A key pillar of Rural LISC's community and economic development toolkit is the integration of digital support and broadband into communities to increase equitable access. In addition, Rural LISC, in partnership with 52 community development organizations, operates a national [Digital Connector](#) program in twenty-two states across the Appalachia region, the Deep South, the upper Midwest, and the Navajo Nation.

LISC supports digital inclusion initiatives in rural and urban communities to ensure that all individuals and communities can fully participate in our society and economy. We believe resilient communities necessitate digital inclusion activities that provide affordable, robust broadband internet options, widely available internet-enabled devices and equipment that meet users' needs, and access to digital literacy training and technical support. With four decades of experience investing in communities' social and economic infrastructure, LISC recognizes the promise of new digital equity investments to help meet the needs of historically disconnected individuals and communities.

Specific Comments

We are pleased to offer comments to questions in the [Federal Register Notice](#). We offer these comments informed by our experience as an intermediary and support of community-based organizations working on expanding digital inclusion initiatives in rural and urban communities.

LISC applauded the historic investment to enhance digital equity efforts afforded by the Infrastructure Investment and Jobs Act. Implemented strategically, these funds will reduce and eliminate historical, institutional, and structural barriers to technology access and use. We greatly appreciate the NTIA's leadership and comprehensive approach to designing and implementing the State Digital Equity Capacity Grant Program and the Digital Equity Competitive Grant Program, which will significantly increase and improve the direction of resources dedicated to removing systemic barriers and providing equal access to opportunity.

Implementation of the Digital Equity Act of 2021

LISC strongly supported the inclusion of the Digital Equity Act within the Bipartisan Infrastructure Law. We agree with the NTIA that the dedicated \$2.75 billion to promote digital inclusion and equity will help to ensure that all individuals and communities have the skills, technology, and capacity needed to reap the full benefits of our digital economy. LISC appreciates NITA's efforts to connect with stakeholders as programs are developed to guide the use of these resources, including the State Digital Equity Planning Grant Program (\$60 million), State Digital Equity Capacity Grant Program (\$1.44 billion), and Competitive Digital Equity Program (\$1.25 billion). These programs, alongside the resources provided by the Affordable Connectivity Program and Broadband, Equity, Access, and Deployment Program, are critical to the meaningful adoption and use of broadband services across covered populations.

We believe that the goals of the Digital Equity Act of 2021 require extensive coordination and involvement of public, private, philanthropic, and nonprofit stakeholders as rules and guidance are developed. The NTIA can lead and incentivize this coordination by requiring applicants to demonstrate robust stakeholder engagement incorporating a wide range of public, philanthropic, and private actors.

State Digital Equity Capacity Grant Program

LISC understands that a successful implementation of the bipartisan infrastructure law's broadband programs requires active participation from States, Territories, Indian Tribes, Alaska Native entities, and Native Hawaiian organizations (collectively referred to as states), and sub-grantees alongside robust support that equips units of government with the necessary implementation resources. Therefore, we encourage NTIA to give states the time required to build local capacity and meaningful partnerships while strengthening state broadband offices.

As NTIA considers the development of an annual grant program for states, we encourage the NTIA to weigh diverse stakeholder involvement more heavily and incentivize states to prioritize investment in community-based organizations. We also believe that NTIA can support impactful program development by ensuring state proposals embed and refer to established best practices and tools

demonstrated to address the digital divide successfully. The NTIA can help facilitate measurable outcomes and impact by including clear application guidance for states to consider as programs are developed and share public resources on common terms and definitions, case studies, research, and approaches that demonstrate the value of investing in digital equity efforts through the widespread availability of education and training.

NTIA should also consider defining computers as appropriate devices in state-funded distribution programs to prioritize the necessary equipment provision as states develop digital equity programs. LISC also encourages the NTIA to create or support national networks of states and localities engaged in digital inclusion activities to ensure resource and best practice sharing. Finally, we also believe that NTIA can incentivize the modernization of state and local surplus policies to donate used, refurbished devices to nonprofit programs that manage distribution to recipients most in need.

Digital Equity Competitive Grant Program

Achieving digital equity requires a multi-pronged approach that provides robust support for digital inclusion activities and spurs greater internet adoption and skilling efforts for covered populations. LISC strongly supports the development of the Digital Equity Competitive Grant Program and believes that these investments will help close the digital divide. As a national grant program, these resources are poised to strengthen our nation's ability to meet disconnected communities and cost-burdened families' needs and connect them to newly available resources, particularly among historically marginalized populations. This is a critical step toward addressing racial and geographic disparities and closing the digital divide gap in America.

LISC recommends that the NTIA consider leveraging existing networks of national nonprofit organizations with established track records supporting underserved communities that employ prime awardees and subgrantees to effectively deploy grant resources. The needs of communities throughout the United States vary, so Federal grant programs should allow for tiered structures that equip community organizations with flexible resources that respond to local challenges. A national-local design would facilitate the targeted use of funds while maintaining flexibility for community-based organizations to meet their local needs, with backbone organizations providing technical assistance, training, performance management, and compliance oversight. This model would also facilitate the ability to design and track impactful program measurement, evaluation, and reporting techniques that aggregate data in real-time to scale impact and build toward sustainable approaches.

Intermediaries such as LISC are structured to support community-based efforts by bridging the gap between public and private funding and underserved populations. With long-term, established relationships with on-the-ground organizations, intermediaries are uniquely equipped to respond to new opportunities with proven abilities to effectively manage and direct federal resources to the areas where they are most needed. These direct connections allow national nonprofits to understand hyperlocal needs and leverage trusted relationships, which would enhance the impact of the Digital Equity Competitive Grant Program by utilizing and building on existing efficiencies and partnerships.

LISC believes the allowance and utilization of a structure of support for intermediary organizations working through subgrantees would advance the goals of the Digital Equity Competitive Grant program through the following efficiencies of scale:

- Leveraging nationwide networks with trusted relationships that overcome barriers to equity by utilizing community-based organizations dedicated to serving historically disadvantaged people and places;

- Delivering capacity-building resources to trusted, culturally competent, and linguistically accessible partners rooted in their communities and also have been demonstrated effective and fiscally sound practices;
- Utilizing existing financial delivery and data tracking systems built to comply with federal standards yet are quick and effectively targeted in managing subgrantees; easing the NTIA's burden of direct management of contracts with community partners;
- Promoting digital inclusion field-building and convening of local, regional, and national stakeholders to establish and share best practices;

Equity-Driven Approaches and Workforce Alignment

LISC believes incorporating Digital Connector models within both the state and national level applications is one of the most meaningful ways the NTIA can ensure that state programs are equity-driven. Digital Connectors work in client-facing roles at community organizations like nonprofits, libraries, and social service agencies. They help people address home connectivity, learn digital skills, and find resources related to digital inclusion. LISC has learned from its network of over 130 Financial Opportunity Center® (FOC) partners, Digital Connector host sites in more than 55 rural locations in 20 states, and 18 Rural Works workforce delivery system support programs in 20 locations in the U.S. and Puerto Rico that there is high demand among these groups' primarily- low to moderate-income client populations to develop skills to access and use technology to improve their lives and livelihoods.

For example, Palmetto Care Connections adapted the Rural LISC digital needs intake assessment for a service population of seniors seeking to access telehealth applications; the adapted model has served more than 2,000 individuals across rural South Carolina, increased the visibility and need for "digital navigation" services to frontline healthcare facilities and their administrations, and earned PCC a 2023 innovation award from the Healthcare Leadership Council. Meanwhile, digital navigation programs that are embedded in organizations that offer financial literacy support demonstrably increase the uptake of the ACP program. Rural LISC Digital Connectors involved in case management play a key role in supporting individuals and families with sensitive questions around supporting household technology access with a limited budget. In partnership with Education SuperHighway, Rural LISC offered ACP enrollment support training to community-based organizations where ACP enrollment among eligible households has increased by as much as 20 percent on a countywide basis.

LISC also encourages the NTIA to consider opportunities to integrate and incentivize utilizing digital equity resources at the state and national levels to support workforce development efforts. Basic digital skills are often required to search for, apply, and enroll in employment and training services. Where possible and with available funding, LISC partners utilize dedicated Digital Connectors to identify, support and train adult workers in the basic digital skills necessary to pursue and attain employment. LISC's FOC® partners have developed internal digital skill assessments tailored for their target population and aligned with their program offerings to assess digital skills.

At the local level, however, many other programs often lack internal capacity or expertise regarding digital skill-building. Given that many community-based organizations provide a wide variety of services to meet the unique needs of their beneficiaries, there can be challenges to providing specialized digital equity resources. For this reason, LISC has invested in staffing capacity, technical assistance, and up-skilling of Digital Connectors and FOC® program staff to build their capacity and expertise to develop and deliver digital skill building. Leading organizations are weaving digital literacy skills training and assessments into existing training rather than creating stand-alone classes. For example, JVS Boston, a LISC FOC® partner, works closely with Quincy College and employer partners to identify and embed contextualized digital skills required for the Biotechnology career pathway directly into the Bridge and occupation training programs, such as software, platforms, and processes.

Occupational digital literacy helps workers develop specific technology-related skills needed in the context of other technical skills training for that occupation. Because this approach allows workers to build industry-specific but transferrable skills, it is more results-oriented than focusing on single, proprietary systems. For example, with private funding, LISC supports FOC® partner sites to build contextualized digital skills into existing career pathway training programs in the healthcare sector. This approach is modeled on LISC's Bridges to Career Opportunities initiative, embedded in the FOC® model and layers in adult basic education that is effective, easily accessible, culturally competent, and relevant (or contextualized) to the desired industry. Instituting a strong feedback loop between employers and training intermediaries on the discrete skills gaps for a job role or any other application (like telehealth) and training interventions that meet these discrete needs is a key mechanism to increase the efficacy of the NTIA's program. LISC believes the same approach is necessary for an equitable approach to building digital skills and expanding socioeconomic opportunity.

Conclusion

LISC appreciates the opportunity to provide these comments to the NTIA and looks forward to continued engagement as new digital equity programs move toward implementation. Please contact Michelle Harati (mharati@lisc.org), LISC Senior Policy Officer, if you need additional clarification on the letter's recommendations.

Sincerely,

A handwritten signature in cursive script, appearing to read "Matt Josephs".

Matt Josephs

Senior Vice President for Policy