



February 6, 2023

Attention: Yufanyi Nshom  
Office of Workforce Investment  
U.S. Department of Labor  
200 Constitution Avenue NW, Suite C-4510  
Washington, DC 20210

Submitted via email: [DigLiteracyRFI@dol.gov](mailto:DigLiteracyRFI@dol.gov)

The Local Initiatives Support Corporation (LISC) thanks the Department of Labor for the opportunity to provide comments on digital literacy and resilience. LISC appreciates DOL's collaboration with Departments of Commerce and Education, and the Institute for Museum and Library Sciences, to advance digital literacy and equity across a variety of sectors.

### **Background on LISC**

LISC is a nonprofit housing and community organization and certified Community Development Financial Institution (CDFI) with offices in 38 cities throughout the country and a rural network encompassing 45 different 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 more than a decade, in particular through our Financial Opportunity Center® network. For more than 25 years, LISC's rural program has also provided dedicated support to rural communities and today 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 supports and broadband into communities to increase equitable access. Rural LISC, in partnership with 32 community development organizations, operates a national Digital Navigator program in twenty 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 that 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.

### **Specific Comments**

LISC is pleased to offer responses to a selection of questions posed in the Request for Information (RFI) on strategies to advance digital inclusion and equity in the workforce:

***Key Themes and Questions:***

**1. *Current Trends in Digital Literacy:*** Please share how actors in the workforce development system, including education entities, libraries, community organizations, businesses or industry associations, and union or worker organizations, are currently engaged in digital literacy in the following areas:

*(a) Assessing digital resilience for adult and youth learners?*

With a handful of notable exceptions, the overall field is still very early in its ability to define and understand the concept of digital resilience, much less assess it. Many workforce and education stakeholders are still primarily focused on helping learners build discrete digital skills.

LISC has learned from its network of over 125 Financial Opportunity Centers®, “Digital Connector” host sites in more than 45 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- LMI client populations to develop skills to access and use technology to improve their lives and livelihoods.

For example, 26 Rural LISC Digital Connector locations are active users of the Northstar Digital Literacy Platform from Literacy Minnesota, a tool that helps assess and build “digital resiliency,” through which more than 700 unique users have logged more than 500 learning hours and attempted nearly 3,000 assessments in the past year that cover essential computer skills, internet basics, “essential” software programs and technology use in daily life.

There is a great deal of room for growth in helping educators, workforce professionals, and policymakers make a “leap of imagination” to understand why digital resilience is important, how it can be fostered, and how it can be assessed. The federal government has a vital role to play in facilitating this leap. A key task for DOL is to ensure that educators and workforce professionals have the tools they need to design digital skill-building opportunities that support both specific skill development and broader resilience.

*(b) Addressing digital literacy skill demands or skills mismatches for adult and youth workers seeking employment or training services?*

There is no standard approach to this challenge at the present time. Instead, workforce development and education stakeholders across the United States use a variety of approaches, some more effective than others.

Basic digital skills are often required to even search for or apply to and enroll in employment and training services. Where possible and with available funding, LISC partners utilize dedicated digital coach and navigator staff members to identify, support and train adult workers on the basic digital skills necessary to pursue and attain employment.

Many programs have incorporated informal questions about individuals’ digital access and skills into their existing intake process. For example, Rural LISC has found through its Digital Connector program

that individuals diverge widely in their digital skills knowledge and capacities; often, they don't know what they don't know. Digital Connectors help clients better understand their current skill levels, prioritize new skills and connect them to appropriate resources to improve their situation. Based on data collected from three cohorts upon program intake and follow-up, Rural LISC found that:

- 72% of clients (96/134) who don't know how to video chat want to learn how to use it;
- 58% of clients (79/136) did not know how to use telehealth services;
- 61% are interested in learning how to access public service benefits;
- After intervention, there was a nearly six-fold increase in the number of clients who knew how to use email who previously reported not knowing how to use email; and
- 45% (590/1309) of clients are interested in protecting their online privacy and security.

Other programs conduct formal assessments or administer self-reported questionnaires to help jobseekers articulate the digital skills they already have and where they may need further upskilling assistance. LISC's Financial Opportunity Center® partners have developed internal digital skill assessments, tailored for their target population and aligned with their program offerings, to assess digital skills.

Across all of these examples, programs themselves often face a lack of internal capacity or expertise regarding digital skill-building. Thus, they run the risk of providing unhelpful advice or training to jobseekers based on a misunderstanding of digital skill needs. For this reason, LISC has invested in staffing capacity, technical assistance, and up-skilling of Digital Connectors and Financial Opportunity Center® program staff to build their own 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. This 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 a focus on single, proprietary systems. For example, with private funding, LISC is supporting Financial Opportunity Center® partner sites to build contextualized digital skill building into existing career pathway training programs in the healthcare sector. This approach is modeled on LISC's Bridges to Career Opportunities initiative, which is embedded in the Financial Opportunity Center® model and layers in adult basic education that is effective, easily accessible, culturally competent, and relevant (or contextualized) to the desired industry. LISC believes the same approach is necessary and effective to build digital skills.

*(d) Identifying in-demand digital literacy skills and/or skills most relevant for the local labor market? Are industry or occupation-specific skills being identified?*

Where this is happening effectively, it is on a case-by-case basis. Workforce and education stakeholders that already have strong relationships with local employers are best positioned to gather this kind of data. A successful method for identifying in-demand digital literacy skills – as well as other skills relevant to the local labor market – is creating, funding, and engaging in industry or sector partnerships. Sector partnerships are collaborations of employers with education, training, labor, and community-based organizations to address the local skill needs of a particular industry. For example, JVS Boston, a LISC Financial Opportunity Center® 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.

In addition to Northstar, some LISC partners use tools developed by the Markle Foundation's Skillfull initiative, which is focused on training human resource professionals and employment coaches on skills-based hiring to translate existing skills to complementary jobs. Participants receive training in assessing job descriptions, reviewing resumes, and developing job responsibilities that are accessible and open to a larger pool of applicants. One organization utilized this training to re-evaluate an open job position and changed the education requirements, which lead to a quality hire that did not have a higher education degree but had significant experience; this alternative approach has subsequently created a high-impact program within the organization.

Sector partnerships are an effective, proven strategy for helping workers prepare for jobs that require skills training, and for helping employers find skilled workers. They help to reduce speculative guessing about employers' skill needs (sometimes referred to as "train and pray"), and instead ensure that people are developing the specific types of skills – including digital skills – and earning the credentials that local businesses are actually seeking to hire.

Despite their proven effectiveness, there is no dedicated, consistent public funding for sector partnerships. They are an allowable use of funds under the Workforce Innovation and Opportunity Act (WIOA) and under short-term grants such as the Commerce Department's Good Jobs Challenge. But the lack of consistent, dedicated funding hampers workforce leaders' ability to identify and respond to digital skill needs in their communities. Dedicated, ongoing federal investment is badly needed.

*(e) Creating and utilizing incentives to engage workers and job seekers in digital learning?*

Rural LISC's Digital Connector program (funded exclusively by private grant sources to date) has found that the relevance of the internet/online applications is associated with access to a reliable computing device, most often a laptop computer. Rural LISC's Digital Connector program is designed with a flexible budget that allows host sites to integrate incentive programs where such strategies improve program delivery and client outcomes. Rural LISC partners have helped host sites subsidize more than 2,000 devices. Similarly, LISC has raised funding for urban Financial Opportunity Center® sites to purchase devices to be utilized to engage and persist in training programs, with some of these partners incentivizing students by allowing them to keep the laptop or device upon successful completion of the training or education program.

*(g) What are some examples of promising practices in the field of digital skills training?*

The share of U.S. jobs that require digital skills has risen rapidly and across industries, with the majority of workers now spending a significant part of their workday using tools and technologies that require digital skills. LISC recognizes promising practices within its network of community-based partners to integrate contextualized digital skill building within occupation training program. This model is based on the LISC Bridges programs that fast-track adult basic education by contextualizing education to industry demands. Digital skills should also be contextualized by teaching the digital skills required for the identified sector or industry, as part of the occupational training program. This better ensures program participants have the digital skills necessary to enter and advance in the field.

*(j) Which library systems and museums do you consider to be exemplars in teaching digital skills? What promising practices do these institutions utilize to serve the public?*

In one such example, with support from the T.L.L. Temple Foundation, Rural LISC is currently deploying a regional digital upskilling model with rural libraries in East Texas, inspired in part by the Texas State Library and Archive's 2021 Texas Digital Navigators Grant Program. LISC commends the American Library Association's nationwide study of the role of public libraries in promoting digital inclusion which found that "libraries are vital digital hubs that provide access to public access technologies and digital content" that in turn promote "education, employment, civic engagement and health" for millions of residents.

**2. Challenges and Barriers to Digital Literacy:** Please share identified mismatches, needs, and/or systemic barriers for stakeholders involved in digital literacy training:

*(a) What barriers are individuals (adult and youth workers/learners) experiencing in accessing digital tools and/or training?*

Logistical barriers, financial barriers, and informational barriers all affect individuals' ability to participate in training and upskilling opportunities.

**Logistical barriers include:**

- **Lack of broadband access.** People who live in neighborhoods that are not served by high-speed internet or who cannot afford the cost of connection face challenges in participating in many digital skill-building opportunities, especially those that rely on high-bandwidth video classes. Even graphics-heavy online tutorials can be expensive to participate in if a person relies on their smartphone for internet access and has a limited data plan.
- **Lack of updated digital devices.** Having a fully functional digital device is vital for participating in digital skill-building opportunities. Individuals who are sharing a single digital device with multiple family members, or who have only a smart phone and no desktop/laptop, cannot participate equitably with their peers in digital workforce training – and sometimes cannot even access such training at all. LISC has addressed this need by fundraising for technology and devices and promoting the device subsidy offered through the FCC Affordable Connectivity Program, as well as connecting LISC's network of partners to nonprofit device refurbishers for low-cost device options. However, these refurbished devices – sometimes a requirement of the private funder as opposed to purchase of new devices – can be out-of-date, slow and ineffective for training and classroom use.
- **Rural or other geography-specific limitations.** People who live in small or rural communities can face a lack of availability of digital upskilling opportunities (because of the size/resource limitations of the community at large), or a lack of access (if the training opportunity is distant and not easy to travel to). According to the Pew Research Center, rural residents are much more likely than urban residents to say that accessing high-speed internet connection is a "[major problem](#)" in their local community. In addition, people living in any size or type of community may struggle to access training opportunities if safety concerns related to violence or widespread drug use make it difficult for them to attend evening classes or travel within their communities. Rural LISC's Digital Connector program has revealed many anecdotal examples of such barriers.

**Financial barriers include:**

- **Having a low income or limited wealth** can affect individuals' ability to obtain broadband access or digital devices (see above). It can also affect their ability to pay tuition or other program costs out of pocket, pay for gas or transportation to program sites (for in-person training), or pay for exam fees or certification tests required to demonstrate their digital skills at the conclusion of a training program. For this reason, LISC is embedding digital skill building into the Financial Opportunity Center® program that partners with community members from underinvested neighborhoods to build family-sustaining careers and achieve financial success. Residents work side-by-side with FOC coaches to identify, make measurable progress towards and achieve their goal through connections to employment services, greater financial health, and household income supports.

**Informational barriers include:**

- **Lack of knowledge about upskilling training options.** People who don't know where or how to build their digital skills can struggle to pursue training opportunities. Similarly, individuals may struggle to discern the differences between available training options (e.g., whether they are legitimate or a scam; how they can be paid for; whether they teach a digital skill that is of lasting value). This is why LISC invests resources in trusted, community-based partners that have long-standing relationships in their local communities and methods to communicate and connect residents to their training and digital skill building services. For example, LISC's partner in Cape Girardeau, MO shared a story about the impact of the Rural LISC Digital Connector program on their service population (which included 108 individuals during the LISC grant period). Their program serves a broad audience including trainees without easy access to the technology required to take the program. In one case, an 18-year-old was living on her own and, with a computer provided by the LISC grant, was able to enroll in the organization's coding program, following which she received and accepted a job as a Junior Developer at a local software company.

*(b) What challenges are instructors and/or training providers facing when seeking to deliver digital literacy instruction and training to learners and/or workers?*

The limited and varying levels of basic and/or foundation digital skills of learners and/or workers is a challenge for community-based and workforce training partners. Without basic digital skills and knowledge, learners have limited ability to access or participate in education and training programs. For this reason, LISC invests in building the staffing capacity of organizations to hire dedicated digital skill building coaches to work both one-on-one and in group settings to address foundational digital skills. Leading organizations and workforce partners in LISC's network are weaving digital skills training and occupational-specific, but transferable, digital skills training into existing workforce and training programs. However, at this time there is not enough professional development support for program providers and instructors on how to go about doing this.

Sometimes, instructors themselves do not have strong digital skills, making teaching digital skills even more difficult. Developing contextualized or integrated models of digital skills training can be slightly more time-consuming and complex, given that they rely on educators' back-and-forth collaboration with employer partners rather than simply purchasing an off-the-shelf curriculum. For this reason, it is especially important that policymakers invest in the technical assistance, support, and professional development that education and workforce providers need to develop these well-rounded models.

*(d) What resources are most needed by educators and training providers to address the challenges in providing digital skills training to individuals?*

The most valuable and urgent resource needed is funding. Ongoing, predictable investment can ensure that there is a sustainable system for meeting individuals' digital skill development needs now and as they change in the future. In particular, digital skill development should be explicitly included as an allowable cost in every DOL discretionary grant program for workforce training – such as dislocated worker grants, migrant and seasonal farmworker programs, the Senior Community Service Employment Program, JobCorps, etc.

DOL should also invest in developing high-quality tools for digital skills assessment and related data collection. A widespread lack of good assessments is hampering skill-building efforts today, and lack of high-quality data is hampering policymakers and providers' ability to identify and respond to racial equity gaps, specific digital skill needs, and other aspects of digital literacy and resilience.

*(f) What challenges or barriers are local entities facing when attempting to use new or existing funding to support digital literacy training for learners?*

Given the nature of public funding, including requirements for audit and performance reporting, many program providers are reluctant to use public funds for digital skill-building unless such use is explicitly permitted. Unfortunately, many public funding sources are lagging behind in explicitly calling out digital skills as eligible for coverage. This is occurring both at the federal level and at the state level. In many cases, no legislative change would be needed; it is simply a matter of affirming that existing statutory or other authorizing language allows for the use of funds to build digital skills.

Among the enormous range of federal policies that could be used to support digital skills are the Workforce Innovation and Opportunity Act (WIOA) Titles I & II; Temporary Assistance for Needy Families (TANF); Supplemental Nutrition Assistance Program Employment & Training (SNAP E&T); Occupational Safety and Health Administration (OSHA) Susan Harwood Grants; Community Services Block Grants; Community Development Block Grants; Office of Refugee Resettlement grants; and Perkins Career and Technical Education funding.

For example, LISC is a current SNAP E&T National Technical Assistance grantee with the goal of building the capacity and competency of our affiliates to become SNAP E&T third-party providers. Through this training and capacity building, LISC is training partners to incorporate digital skill building activities as SNAP E&T components. However, some states do not clearly define – or in some cases exclude – digital skilling as an allowable expense for reimbursement funding.

While some federal and state agencies have taken positive steps in affirming that funding can be used for digital inclusion, DOL and other federal agencies can do more to formally reassure program providers that workforce and education policies can support digital skill-building. This is especially important given that Digital Equity Act funding by itself is not nearly sufficient to meet the need for digital skills, and it is also time-limited.

**3. Digital Equity and Inclusion:** Please share what steps need to be taken by digital literacy stakeholders to ensure the following equity milestones are achieved:

*(a) What additional resources are needed for workers of all backgrounds to access and succeed in digital literacy upskilling/training opportunities?*

LISC encourages DOL to invest in a systematic study of “worker voice” investigating what is keeping people in programs engaged when digital access barriers exist. Digital barriers can stop an individual before the career path begins.

*(b) How can programs ensure underserved and/or marginalized populations are adequately targeted for digital literacy training opportunities?*

Rather than asking how to target learners, DOL should be cognizant that many underserved community members are already keenly interested in this topic and eager to learn more. However, they often face disconnects in that the organizations they know and trust are not those that are receiving public resources. Policymakers should focus on how to ensure that organizations that have already earned the trust of underserved populations are appropriately resourced to address their digital skill-building needs. LISC is built on the premise that government, foundations and for-profit companies have the capital; residents and local institutions understand the need; and entities like LISC can bridge the gap by offering the relationships and expertise to assist community organizations in attracting the kinds of resources that allow them do their best work.

Federal agencies can incentivize collaboration between workforce training providers and other groups such as immigrant advocacy organizations, adult education programs, civil rights organizations, or other nonprofit community-based organizations. These organizations should be integrally involved throughout the planning, creation, and implementation process of digital skills training programs. Partnering with these organizations centers the trust built with marginalized communities over many years, in comparison to creating and standing up new programs or facilities.

**5. Federal Investments in Digital Literacy:** Please share what support from the federal government is needed to advance national digital literacy attainment efforts:

*(a) Which existing federal programs/federal funding sources are being utilized to support digital resilience?*

LISC is aware of the following:

- LISC Digital Connectors have accessed CARES Act dollars for digital inclusion programming
- LISC Digital Connectors are helping bridge the goals of the National Telecommunications Information Administration’s Digital Equity Act program with our network of work-facing organizations and their role in digital upskilling
- LISC Financial Opportunity Center® partners are pursuing SNAP E&T third-party partnerships and reimbursement funding to support digital skill activities
- Longer term, federal regional commissions, such as the Delta Regional Authority, will create and manage grant programs with a digital upskilling focus.

## **Conclusion**

LISC appreciates the opportunity to provide these comments to the RFI and looks forward to continued engagement. Please contact Julia Brown, LISC Program Officer (jbrown@lisc.org), if you need additional clarification on the letter's recommendations.



Thank you for consideration of our comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "Matt Josephs", followed by a long horizontal flourish.

Matt Josephs

Senior Vice President for Policy