31 August 2023

Joshua Breitbart
Senior Vice President, ConnectALL
Empire State Development
633 3rd Ave #34, New York, NY 10017

Dear Joshua,

On behalf of the New York State Digital Equity Network (NYSDEN), we are writing to formally submit our public comments (13 Recommendations) to be included in your team's research process for the writing of the New York State Digital Equity Plan.

NYSDEN is a network of experienced digital equity practitioners from across the state. We have decades of experience and hundreds of thousands of hours of work with New Yorkers. A majority of our Network members have served as regional liaisons for ConnectALL's statewide outreach to date. As we share ConnectALL's goal of digital equity for all, we are sending these recommendations in advance of the public comment period to summarize our knowledge and experience to inform the writing of the plan.

We believe that the New York State Digital Equity Plan must focus on innovative, locally-implemented solutions that reach all target populations. As critical stakeholders, we offer the following essential, actionable recommendations to advance digital equity for all.

We respectfully request that you submit these comments in their entirety as a public comment and research element in your final NY State Digital Equity Plan to the National Telecommunications and Information Administration ( NTIA)

## EFFECTIVE PROGRAMS

**Recommendation 1:** Effective digital equity infrastructure and digital inclusion programs must be community-led at the local level as close to the target populations as possible and include diverse leadership and practitioners from those communities.

As such, funding in budgets should be allocated to fairly compensate community and partners for their time, including funds specifically allocated to compensate participants for their participation in all design, evaluation, impact, research and leadership activities.

**Recommendation 2:** The NY State Digital Equity Plan must define small business owners as an additional target audience - especially those that are Minority and/or Women-owned Business Enterprise (MWBE).

**Recommendation 3:** Digital equity and inclusion work should be explicitly distinct from but also aligned with other programs such as:
- Community development
- Workforce development
- Economic development

**Recommendation 4:** The NY State Digital Equity Plan should set clear expectations about effective digital inclusion programs listing the following components:
- Programs must have customized pedagogical approaches for diverse target audiences. For example, adults learn differently from children who learn differently from English language learners who learn differently from formerly incarcerated people.
- Programs must have paid staff and not solely rely on volunteers.
- Programs must leverage strategic partnerships to optimize outreach to high need clients, and to support long term sustainability of all digital inclusion efforts.
- Programs must emphasize digital resilience - the awareness, skills, agility, and confidence of a person to use new technologies and adapt to changing digital skill demands - over discrete skill acquisition.

**Recommendation 5:** The NY State Digital Equity Plan should explicitly state and financially support the critical role that Digital Inclusion Coalitions and Digital Equity Networks play in the development, sustainability, and excellence of digital equity infrastructure and inclusion work.
- To ensure ConnectALL's work succeeds, these same entities should be valued stakeholders with defined roles in the on-going development, evaluation, review, and evolution of ConnectALL's work.

## GRANTING FUNDING & REVIEW PROCESS FOR DISTRIBUTION OF FUNDS

**Recommendation 6:** The NY State Digital Equity Plan should explicitly state the evaluation criteria for effective digital equity infrastructure and inclusion programs and projects.

Evaluation criteria should prioritize and give high consideration to the following program qualities:

- Locally driven work that is flexible and responsive to needs of local populations.
- Programs that are either experienced and established or programs that include funding for mentoring from experienced practitioners.
- Programs that support wraparound solutions: device access, internet access, and tech education or some combination of those solutions as needed by each client served.
- Programs that include monies for outreach and marketing as people who are impacted by the digital divide do not always seek assistance; effective programs must invest in and conduct significant outreach.

**Recommendation 7:** ConnectALL grant reviews should use a Participatory Budgeting Process by engaging community members and digital inclusion peer practitioners in the direct evaluation of funding requests and competitive grant proposals thus giving community members the ability to decide how to spend monies in their own communities.

**Recommendation 8:** The distribution of money for digital inclusion programs should not flow through one singular entity or follow a "one solution serves all" modality; rather, due to the diverse target populations and diverse communities, the funding will be best optimized at local levels by allowing for grant programs to be administered through various agencies and entities. Communities themselves should have a say in recommending the most effective grant administering entities in their area.

- Potential State agencies and granting entities could include:
    - State Education Department (SED) through the State Library or through affiliated State Library Systems
    - Other State Education Department (SED) programs such as Adult Literacy Education grants
    - Office of New Americans grants to reach immigrant services providers
    - Department of Youth and Community Development to reach young people and families
    - Empire State Development
    - Department of Labor (DOL)
        - NOTE: If DOL is considered as a granting agency, it is advisable that proof of work authorization not be a requirement for participation in programming as this could limit target populations that can be served.
- Potential non-State agency granting entities could include:
    - Libraries and library systems
    - The United Way Network
    - Lead nonprofits or community organizations

**Recommendation 9:**  The NY State Digital Equity Plan should explicitly indicate that a minimum of 25% of the unmandated federal funding dollars for digital equity will be dedicated to digital inclusion programs so that federal money is not used solely for infrastructure projects.

**Recommendation 10:**  When evaluating effective potential programs to fund and when evaluating the effectiveness of funded programs, performance metrics must include the following considerations:
- Avoid performance metrics that overly value a low cost per participant ratio.  The cost of programs that provide devices and/or assistance with Affordable Connectivity Program (ACP) enrollment is significantly higher than the cost of education-only programs. This is because devices and ACP enrollment assistance require additional resources, such as staff time and funding for devices.
- Program effectiveness is about closing the digital equity gap for each person served more than about the number of unique people served. This should be measured by before and after metrics of device access, internet access and skills.
- Program effectiveness should be evaluated not just by quantitative statistics but also by qualitative data, storytelling, and long term impact measurements.
- Engagement of local community members in leadership and programming is a valid and essential program impact  measurement and will require that funding includes the ability to compensate those community members for their participation, time, insights and knowledge.
- Program effectiveness should be determined by measurable outcomes that align with community needs not needs defined at the State level:
  - Customize the outcomes to the region, community or target population.
  - Allow for outcomes to evolve as the NY State Digital Equity Plan rolls out and as the digital equity and  inclusion landscape evolves.
- Program effectiveness should be measured by allowing those who are served to evaluate how well the program benefited them.
- Program effectiveness measures should encourage - not penalize - programs that engage in mid-stream corrections in response to established feedback or changes in the digital equity ecosystem.

## SUSTAINABILITY & EVOLUTION OF THE WORK

**Recommendation 11:** The NY State Digital Equity Plan should explicitly include recommendations and/or a plan for future funding for this work.
- While the federal funding is historic, it is not enough to bridge the digital divide in New York.  Furthermore, the needs will be on-going as technology evolves.
- Explicit funding plans could include suggestions like a state tax levy for digital inclusion programs.

**Recommendation 12:** Create a defined entity charged with regular and on-going review of NY State Digital Equity Plan implementation.

Digital tools, devices and forms of internet access are always evolving. To best reach vulnerable populations with current and relevant programs, on-going review of the State Digital equity plan will be essential. We recommend development of a reviewing entity that addresses these suggestions:

- This entity should be composed of diverse stakeholders and establish a rotating membership process.
- Models could include an advisory board, review panel, or digital equity task force.
- Digital inclusion practitioners as well as digital inclusion coalitions and networks must have official representation in this entity.

## ADVOCACY & BEYOND

**Recommendation 13:** As digital inclusion practitioners, we look to ConnectALL for more than just the creation, implementation, and oversight of the NY State Digital Equity Plan and associated future funding. We need the following immediate support:
- Advocate for immediate financial support of digital equity and inclusion programs (before the federal monies are approved) such as the release and implementation of the more than $15 million dollars that New York has already earmarked for digital inclusion work since 2021 but have yet to be allocated. (Chapter 53, section 1, of the laws of 2021, Aid to Localities Appropriations Bill | NYS FY 2024 Executive Budget)
- Advocate for defining digital equity and inclusion programming - including device distribution and ACP enrollment assistance and basic tech education - as valid workforce and economic development programs.
- Explicitly define digital equity as a solution to poverty that seeks to bridge historic and systemic racism through equal access.
- Serve as the voice of digital equity and inclusion priorities to elevate the cause of digital equity with elected officials, advocates, and philanthropic funders.
- Protect vulnerable New Yorkers from predatory practices by serving as a watchdog in this arena by
    - creating a system to receive consumer feedback.
    - presenting this feedback to relevant regulatory entities on a state and federal level.
- Provide regular reports on the success of digital equity funding and/or changes to programming approaches based on evaluation metrics.
- Visit our sites to develop a documentary that tells the stories of the digital divide in our communities.
- Serve as the hub of all NY State digital equity information and resources including increasing the transparency of all ConnectALL work by regularly updating the ConnectALL website with information including:
    - Current ConnectALL office work and programs

- - The final NY Asset Inventory
  - A list of the various task forces and subcommittees, with contact details
  - A resource hub for digital equity infrastructure and inclusion best practices and research for practitioners and communities
- Build trust among all stakeholders -  State Agencies, digital inclusion practitioners, digital inclusion coalitions and networks, target populations, elected officials, and more - so that we can collaborate to achieve a common goal - digital equity for all!

**The undersigned individuals and organizations are signing this letter in support of the comments collectively written by the New York State Digital Equity Network:**

## *ORGANIZATIONS*

- The Bronx Community Foundation
- CanCode Communities
- Central New York Digital Inclusion Coalition, Onondaga County
- Finger Lakes Digital Inclusion Coalition
- Knox Broadband Committee
- Mohawk Valley Library System
- Mohawk Valley Economic Development District
- The STEM Alliance, Westchester County
- Syracuse Northeast Community Center, Onondaga County
- Upper Hudson Library System, Albany County
- Westchester Library System, Westchester County
- Westcott Community Center, Onondaga County
- Western New York Digital Equity Coalition, Erie County
- Western New York Library Resource Council

## *INDIVIDUALS*

- Brenda Brush
  - Manager of Digital Projects, Westchester County Association, Westchester County
- Jennifer DeWeerth
  - Dean of the Rome Campus and Community Outreach, Mohawk Valley Community College, Oneida County
- Jeffrey Zane Hansen
  - Development Specialist, Mission: Ignite Powered by Computers For Children, Chemung County
- Brian  Hildreth
  - Executive Director, Southern Tier Library System, Steuben County
- Arden Kirkland
  - Independent Contractor and Adjunct Instructor, iSchool at Syracuse University, Ulster County
- Lori Klivak
  - Director - Senior Services, Interfaith Works of CNY, Center for Healthy Aging, Onondaga County
- Mary-Carol Lindbloom
  - Executive Director, South Central Regional Library Council, Tompkins County
- Steve  Otis

Uniting leaders to advance digital equity in NY state          www.nysdigitalequity.org

- State Assemblyman, Chair Assembly Science and Technology Committee, Westchester County
- Karin  Wikoff
  - Electronic and Technical Services Librarian, Ithaca College, Tompkins County
- Heidi Ziemer
  - Digital Literacy and Tech Support Task Group, Western New York Digital Equity Coalition, Erie County