

# ALA American Library Association

May 1, 2023

*Submitted Electronically via Regulations.gov*

Hon. Alan Davidson  
Assistant Secretary of Commerce for Communications and Information  
Administrator  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Ave, NW  
Washington, DC 20230

**Re: Comments of the American Library Association in Response to the Request for Comments on the Development of Digital Equity Act Programs Established by the Bipartisan Infrastructure Law for Implementation by NTIA; Docket Number: NTIA-2023-0002**

Dear Administrator Davidson:

The American Library Association (ALA), which represents the nation's 123,000 libraries of all types—including school, public, community college, academic & research, Tribal and other libraries—celebrates the enactment of the Infrastructure Investment and Jobs Act (IIJA), and especially, its historic investment in advancing digital equity, literacy, and inclusion. As longstanding cornerstones for equitable access to information and broadband-enabled services, libraries are instrumental to achieving the goals articulated in the Digital Equity Act (DEA) and IIJA. Libraries enable individuals to apply digital tools and services to achieve important goals for themselves, their communities, and the nation.

The ALA appreciates the expertise the U.S. National Telecommunications and Information Administration (NTIA) brings from past initiatives like the Broadband Technology Opportunities Program (BTOP) and BroadbandUSA activities and support that continued after BTOP concluded. These programs increased broadband access and adoption and enabled libraries and other community anchors to improve and expand their public access technology resources, better address workforce development needs, expand digital literacy training opportunities, and create stronger community linkages and integrated services. As we look ahead, we must build on this foundation and apply lessons learned from previous broadband initiatives to connect more people with affordable, high-capacity broadband, digital services, and the technology skills to thrive.

To this end, we recognize that digital equity requires a multi-faceted, people-oriented approach with strong collaboration across stakeholders to address the digital divide holistically. Libraries are among the most highly trusted community institutions and are cost-effective vehicles for federal broadband investments under the IIJA. Small and rural libraries are often singular in providing free public technology access but are chronically under-resourced for the diverse services they offer. Over many decades, libraries have identified and implemented creative and innovative solutions to advance digital equity, literacy and inclusion, workforce development, and telehealth, as well as coordinating and connecting with other trusted entities at the local and state levels. For example, libraries of all types are:

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- *Bringing the internet to their residents* with equipment lending, hotspots, and other connectivity innovations. One example is the Orange County (CA) Public Libraries<sup>1</sup>. Through the Wi-Fi on Wheels programs, the library brings no-fee internet connectivity to low broadband neighborhoods throughout the county. Library staff are available to answer questions and provide digital skills support. Venito Garcia Library of the Tohono O'odham Nation (AZ), Tulsa (OK) Community College Library, and San Jose (CA) Public Library are just a few of the many libraries which lend laptops and hotspots to their users to complete homework, attend classes, search for jobs and so much more.
- *Building digital skills*. Watauga County (NC) Public Library provides digital skills coaching for parents and caregivers of K-12 students. Johnson County (IN) Public Library provides Digital Navigators that assist residents find low-cost internet service, access computer training, borrow devices, navigate online social services, and offer technical support.
- *Providing workforce development support*. For instance, the Massanutten Regional Library in Virginia does one-on-one assistance with building a resume, searching for and applying for jobs online, and setting up email and other online accounts.
- *Building information literacy skills*. The Naugatuck Valley (CT) Community College, a Hispanic Serving Institution, and Waterbury Public High School librarians partnered together to develop and deliver an information literacy instruction program for the high school students to ensure they had the research and critical thinking skills needed to be successful when entering college.
- *Providing access and support of social services and telehealth in their communities*. The Jeff Davis County (TX) Library is soundproofing conference rooms and providing needed equipment and technical assistance so residents in this rural community can have confidential telehealth sessions.
- *Serving as hubs AND spokes in delivering service*. The New Jersey State Library, for instance, recently launched two models for expanding access to digital literacy training and support. In one, three hub libraries serve as regional training labs with 11 spoke libraries connecting with local Workforce Development Boards, American Jobs Centers, and other libraries to create a referral system and provide access to high-quality training materials, videos, and lessons. The second program provides a cohort of skilled trainers that rotate through participating libraries to provide individualized assistance for digital skills and job training.

The library examples above highlight just some of the many, many ways libraries and library staff are advancing digital equity in their communities. Some of these activities, such as workforce development and connecting to social services, long pre-date the online environment. These programs highlight how libraries build on a foundation of trust with longstanding practices and innovative new ideas that can be cultivated through grants from the IJA. Investing IJA funds in libraries leverages existing resources, expertise, and experience so that new initiatives benefit from existing library infrastructure—buildings, expert staff, broadband, hardware & software, information resources, local knowledge, and excellent reputation—so that new funds can be more focused on expansions and programming. Funding programs in libraries has a high likelihood for success today and will be sustained well into the future.

Measuring and defining success for digital equity requires customizable measures and community-defined goals and objectives, including the perspectives of Covered Populations. This, therefore, requires flexibility in program guidelines and evaluation. Safeguarding personal information is of utmost

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importance, especially for vulnerable populations. Building time and funding for continuous improvement into the model will create avenues for adapting to changing contexts. Additionally, transparency is an important value for successful programs and invites further collaboration using shared resources, data, and promising models.

Below, in response to the questions from the NTIA, we provide innovative examples from libraries in supporting digital equity to Covered Populations to replicate and scale; we offer ways to leverage libraries in closing the digital divide; we detail ways to make the program flexible and responsive enough to connect with hard-to-reach communities, inclusive and representative of diverse locales in the United States; and through the lens of libraries, promote the successful execution of DEA grant programs. Throughout our comments, we recommend that program guidelines be flexible and inclusive, ensuring that important community anchor institutions (CAIs), including small, rural, and underrepresented CAIs, are able to fully participate. These voices are essential to achieving digital equity.

## A. Assessing State Digital Equity Plans under the Digital Equity Planning Grant Program

**Question 1: During the public comment period for the States' Digital Equity Plans, what guidance should NTIA and/or each State provide to enable communities to review and provide actionable feedback to States regarding their State Digital Equity Plans? What criteria/factors/outcomes should communities focus on in their review? How can NTIA ensure that States/Territories consult with Tribal entities about how best to meet Tribal members' needs?**

*Review and feedback:* First and foremost, NTIA and States should encourage coordination across existing assets and trusted intermediaries to the greatest degree possible to maximize reach and efficiency for reviewing and providing feedback on State Digital Equity Plans. Many, if not most, of these entities, should also have been part of the planning process and/or the asset inventory as outlined in section 4 of NTIA's Digital Equity Plan Guidance.<sup>2</sup>

Libraries, like many community anchors, have deep connections to the communities they serve. These connections should be leveraged to connect with unserved, underserved, and disenfranchised community groups who should benefit most from the digital equity plan but may not be engaged directly with the planning process.

For instance, in Ohio the Wood County District Public Library hosted listening sessions earlier this month to explore local needs related to the internet and technology. The program was conducted by the Bowling Green State University Center for Regional Development and the Toledo Lucas County Library, which received a grant through BroadbandOhio to serve as a "Regional Digital Inclusion Alliance" lead for Northwest Ohio.<sup>3</sup>

Public libraries are the cornerstone of their community, are accessible, include public transportation and/or offer parking, and are open to people of all ages and backgrounds. Libraries of all types— including K-12 school libraries, public libraries, tribal libraries, and libraries in higher education— engage and provide services to Covered Populations targeted in the DEA, as well as specific age groups within the Covered Populations like teens or college students. Therefore, libraries are well-suited as

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connectors, facilitators, and conveners to gather community input and opportunities to provide comment — in person or virtually.

To best facilitate this engagement among historically underserved groups, ALA recommends NTIA and States use plain language at a third-grade or similar reading level. Communication should be available in the primary language(s) of the community, not just English. Communicating the process in multiple languages allows non-English speakers to provide feedback using the language they feel most comfortable. Reaching out to the community using their preferred language shows that they are included in this process. States should also leverage community anchors to connect with Covered Populations to inform and promote the state’s plan for gathering their feedback. States should provide community anchor funding to help support and advance this outreach work.

Feedback should be gathered using a variety of communication channels including paper and web surveys, phone, web conferencing, or in-person meetings. Input must be enabled in both digital and non-digital (paper or in-person/by phone) mechanisms. If any personally identifiable information is solicited, it should be protected.<sup>4</sup> In addition, for in-person sessions, states should provide funding to the conveners to support the planning and hosting of the listening sessions. The grant can be used to provide food and childcare to ensure individuals within the Covered Populations who are included in the plan are able to participate and have a true voice in the process.

NTIA has experience reaching out to and engaging with diverse populations and organizations. As such, they should create tools shared on BroadbandUSA that provide guidance for effective practices for enabling diverse public participation. In addition, NTIA should highlight organizations and anchor institutions that already engage with diverse communities. For instance, library workers see and hear patron difficulties navigating government information and resources. States should consult trusted intermediaries in developing the comment process, as well as in the outreach.

*Focus for review:* To limit overlap or duplication of effort, one key priority of focus should be alignment with existing efforts. Often, library leaders tell us that new (and overlapping) programs are created (and cease when the funding stops) with new public and philanthropic investments, rather than building on and expanding existing programs and services to meet community needs. State plans should include robust asset mapping and documentation of how the plan leverages existing assets and promotes collaboration to address persistent gaps and barriers for Covered Populations. This also should be readily apparent in the plan section related to stakeholder engagement and outreach.

There should be an emphasis on cost-effective use of federal taxpayer dollars. Thus, proposals that leverage existing community infrastructure should be prioritized over those that would newly-create this foundation. Libraries and other CAIs are among the pre-eminent institutions that are well-placed for cost-effective new initiatives in digital equity.

For example, 88% of public libraries currently provide informal or formal digital literacy training.<sup>5</sup> Every state plan should include reference to public libraries within sections related to broadband adoption and skills building. In addition to national data from the Public Library Association (PLA), a division of ALA, and the Institute of Museum and Library Services (IMLS), some state library agencies have conducted research and led statewide projects related to digital equity. This year, for instance, the Texas State Library and Archives<sup>6</sup> released a statewide report on digital literacy in the state’s public libraries and the

Idaho Commission for Libraries<sup>7</sup> detailed library digital equity resources available through the state's libraries.

Plans should obviously meet statutory requirements in terms of reaching and improving outcomes for people in Covered Populations with credible engagement of trusted intermediaries and realistic timeframes for implementation. Reviewers should evaluate how the state plan is informed by impacted community members, addresses gaps and avoids duplication of services, and provides funding and other support for trusted intermediaries like libraries. Funding is a common barrier for libraries and other CAIs to expand and deepen needed services.

**Question 2: Over the next year, NTIA will deliver technical assistance for States and Territories to develop holistic, actionable, and impactful State Digital Equity Plans. NTIA has created a Needs Assessment Guide, Asset Mapping Guide, Digital Equity Plan Guidance, Best Practices, Workforce Planning Guide, webinars, and other technical assistance resources. What additional guidance/resources should NTIA provide to States, Territories, and Tribal entities as they develop their Digital Equity Plans? What additional guidance can NTIA provide to help States and community organizations utilize other federal tools to close the digital divide by increasing access and reducing cost like the Affordable Connectivity Program? Individuals and communities who are most impacted by the digital divide are in the best position to help States, Territories, and Tribal entities understand the inequities and how best to focus and scale local efforts. How can individuals and communities provide feedback to States, Territories, and Tribal entities to ensure their unique communities' needs are solicited, considered, and reflected in the Digital Equity Plans?**

ALA commends the NTIA for providing relevant and supportive tools and technical assistance. Additional guidance and examples for demonstrating alignment with existing economic and workforce development goals, plans, and outcomes; educational outcomes; health outcomes; civic and social engagement; etc., is needed. Can NTIA provide examples or templates for crosswalks in these domain areas, for instance, pulling from both sector-specific entities (e.g., workforce agencies or rural healthcare providers) and community-specific or broad-based entities (e.g., senior centers and libraries)? Particularly in terms of educational outcomes, ALA also recommends explicitly considering and including libraries and librarians embedded in K-12 school and higher education settings.

NTIA can and should play a role in providing central access to reliable data and documents to assist States in planning, implementation, and updating of state digital equity plans. NTIA's Digital Equity Plan Guidance provides essential examples: the American Community Survey, the NTIA Internet Use Survey and NTIA Indicators of Broadband Need.<sup>8</sup> NTIA can and should make it easier for States to learn from each other in terms of statewide assessments, data and research, and methodologies. NTIA should:

- Provide guidance for States and stakeholders to assist them in identifying credible data sources to be used in establishing need and measuring impact. NTIA can guide States in concisely documenting need using established datasets and providing examples of state and local data and research to reduce time spent by States and stakeholders searching for or developing new tools when existing resources are available but not widely shared.
- Regularly update the clearinghouse to include policy guidance, template documents, case studies of promising practices, and research and analysis that can inform and improve States'

digital equity work. While some applicants will have access to data analysts, smaller organizations will need support, instruction, and tools to assist them in analyzing data.

- Provide technical assistance that helps stakeholders take advantage of complementary resources available through other federal agencies, such as Department of Education resources on digital literacy instruction and assessment and Department of Labor resources on digital literacy needs and training opportunities. NTIA should model cross-agency collaboration by holding joint webinars and/or issuing joint policy guidance with these and other federal agencies.
- Provide a repository to store or link to data and tools that will assist in understanding needs, creating interventions, and assessing program impacts.
- Broadly share lessons and best practices. In addition to developing and maintaining a central clearinghouse, we propose activities to share successes, lessons learned, and promote cross-sector and intra-sector efforts. For example: annual conference by NTIA, road tour by NTIA Administrator/other official, monthly newsletter, weekly podcast/short videos from grantees, funding to some groups for this purpose and sharing information on the BroadbandUSA website.<sup>9</sup> Appendix A in the Digital Equity Guide for States is an example of the sharing that is needed to reduce duplication of effort and speed state action.

Resources to promote efforts most likely to be strategic and sustainable would be helpful. For example, a compendium and synthesis of the larger trends related to digital equity would provide the larger context for specific efforts, aiding the effort of ensuring that near- and mid-term projects contribute to longer-term goals. Also, an annotated list of funding resources and possibilities would help to steer activities toward those that are more likely to be financially sustainable in the long run.

Finally, inclusion and outreach should not be an afterthought if we hope to hear from those most impacted by digital inequity. Rather, it should be prioritized and funded with incentives for individuals to provide information, funding to support CAIs in outreach and information-gathering sessions, and enforcement by NTIA of this program requirement.

## B. State Digital Equity Capacity Grant Program

**Question 3: How should NTIA *define* success for the Capacity Grant Program? What outcomes are most important to measure? How should NTIA *measure* the success of the Capacity Grant Program, including measures and methods?**

Each State's Digital Equity Plan will include core activities to address the needs of Covered Populations and how their activities will address the gaps in the existing digital equity landscape. This will include having both baseline metrics and defined, measurable goals. As projects are created, implemented, and supported, metrics can be used to track progress toward achieving each State's goals over time. The metrics should include data documenting if the Covered Population's digital equity is increasing across the different groups equitably overall, by age, and by location or if some Covered Populations or groups within the Covered Population are being left behind during the implementation phase.

The overarching goal should be to ***encourage the use of measurable goals and objectives as a tool to accomplish greater equity, not as an end in themselves***. Given the rapidity with which the digital equity field is evolving, NTIA should refrain from endorsing or promoting any single assessment or

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measurement tool. Instead, NTIA should foster an atmosphere of flexible experimentation and rigorous creativity among States and other stakeholders. Existing baseline information should be used as a starting point for measures, along with any new needs assessments to fill gaps in the baseline. However, these metrics must also take into account that some community anchors and other institutions must balance the need to measure progress toward documented goals and protect and safeguard the privacy and confidentiality of those we serve.

In fact, forty-eight states have statutes that require libraries to protect patron privacy. We understand that in some cases capturing Personal Identifiable Information (PII) may be required. In those cases, we ask that NTIA explicitly state that it will (and States will) follow State library privacy statutes and student's educational records in compliance with Family Educational Rights and Privacy Act or FERPA related to safeguarding sensitive and legally protected information.

Inappropriate access and use of PII can negatively impact the individuals whose PII was compromised. In many cases these individuals are vulnerable, and this breach of trust could disenfranchise the individual from using this valuable service. In addition, a lack of privacy may affect a users' willingness to avail themselves of the services and programs that they want or require to further their digital equity goals. Some of the Covered Populations are reluctant or unwilling to share personal information because they mistrust how that information can be used because they have experienced or know someone that has experienced harm due to misuse of their personal information in the past.

We also ask that the NTIA consider the long-term impact of the data they ask organizations to collect. For instance, the FCC's Emergency Connectivity Fund program asked schools and libraries to retain PII for 10 years. This means that an FCC auditor in 2030 could request personal information about an individual who participated in the ECF program in 2021, long after the original program is complete. The requirements added unnecessary burden and reduced program participation among library applicants.

Success should be defined at multiple levels. Individuals should have the opportunity to achieve *their* own digital equity goals within a Covered Population's and State's goals, for instance. This will demand some room for flexibility and customization within digital equity goals. Funded anchor institutions, community-based organizations, digital inclusion coalitions, and other entities also will have their own measures of success rolling up to state targets. In many cases, these entities may enable improved access (e.g., using funds to enable adding privacy booths that support telehealth, distance learning, and remote job interviews), so measuring increased capacity, increased community awareness and use, and individual outcomes are all relevant. Measures and methods should be both qualitative and quantitative and explicitly include the voices and experiences of impacted community members, as well as how barriers identified in the planning process were addressed.

As programs and activities progress, achieving significant gains for some or all of the Covered Populations may get harder to achieve. Additional research may be needed to better understand why digital equity goals are not increasing for specific Covered Populations or for groups within a specific population. This research should be encouraged to better understand specific groups' values so interventions can be targeted to meet the activity goals to ensure groups within the Covered Populations are not left behind. A continuous improvement cycle should be built into plans; time and funds should be set aside for needed adjustments, as well as time for evaluation and reflection. Iterating to meet changing circumstances and new information should be a sign of success, not failure.

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For those Plan activities that are meant to be sustained beyond the capacity grant period, information should be gathered through the Capacity Grant Phase reporting structures to ensure the organization(s) are not only achieving the current activity goals but can demonstrate plans and commitment toward sustainability.

**Question 4: How should NTIA design the Capacity Grant Program to ensure equity is achieved? Please explain. NTIA encourages stakeholders to provide the rationale for their comments, including available examples of studies, measures, outcomes, assessments and supporting information.**

NTIA should take care to encourage wide participation in the Capacity Grant Program by limiting program complexity and maximizing technical support and transparency. Often smaller and less-affluent libraries and other entities with deep ties and trusted relationships with underserved groups lack expertise in applying for grants and lack capacity for managing burdensome applications, administration, and reporting. States should build flexibility and low-barrier entry to enable inclusion for these trusted entities. Specifically:

- Streamline applications and management over the life cycle of the grant for small/less-affluent libraries and other community anchors;
- Create a simple form and streamlined follow-up processes for lower-dollar grant requests so small and less-affluent libraries and other community anchors can participate;
- Encourage or preference proposals from groups of smaller or less-affluent libraries and other community anchors (i.e., aggregation of applicants at the outset);
- Provide robust outreach and support, including NTIA technical assistance, from the application process through grant completion; and
- Encourage cooperative agreements with regional library cooperatives, state library agencies, associations, or similar entities to administer funds to small/less affluent libraries.

There should also be metrics to ensure Capacity Grant funding is equitably distributed among CAIs, especially smaller and less-affluent CAIs and libraries. For example, about 57% of U.S. public libraries serve communities with fewer than 10,000 residents, and a vast majority of these libraries employ fewer than five FTE staff. CAIs that represent, have deep ties with, and have a documented history of successfully working with Covered Populations (including those residing in rural areas) are vital to successfully implementing State plans. As such, States should set targets and track funding to ensure a certain percentage of the State's Capacity Grants are going to these organizations either through grants or subgrants.

NTIA should encourage and support States in identifying and funding relevant supports for digital equity, such as addressing cybersecurity and making accessibility software and hardware eligible expenses. Too often necessary infrastructure and enabling training and staffing are afterthoughts, at best. ALA urges NTIA and States to explicitly consider the "connective tissue" and scaffolding needed to achieve digital equity goals and sustainability.

**Question 5: What criteria/factors should NTIA take into consideration when assessing whether States, Territories, and Tribal entities are meeting the stated goals of their Digital Equity Plans? How should NTIA measure each Digital Equity Plan's progress in the short-term (one year or less) and long-term (two or more years)?**



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While using quantitative data to measure progress toward meeting the Plan's activities will be important, qualitative data also should be emphasized. The DEA was created to ensure that all people and communities have the skills, technology, and capacity needed to reap the full benefits of our digital economy. While quantitative data will measure how many people have accessed training, have gained skills, or have subscribed to the internet, it is only through the qualitative analysis that we will understand if and how this access is helping Covered Populations fully participate in the digital economy. Qualitative analysis will be particularly important for understanding persistent barriers and long-term outcomes.

Additionally, it is not enough to create programs that target the Covered Populations, members of the Covered Populations should be encouraged and supported in taking on peer support and training roles and provided opportunities to give feedback and share perspectives about the development and implementation of interventions to support the State's Digital Equity goals.

Finally, States should have a balanced portfolio of projects ensuring that some grants focus on solving the immediate needs of Covered Populations while ensuring there are projects funded that are developing infrastructure and sustainability for digital equity beyond the State's current plan. As NTIA evaluates State's implementation practices, it should review the portfolio to ensure that there is a balance between meeting the immediate needs of the State while ensuring the State is laying the groundwork for sustaining digital equity in years to come.

**Question 6: What reporting requirements should NTIA establish for grantees to ensure that the voices of those most impacted by the digital divide are reflected in the implementation and updates of the Digital Equity Plans? What steps, if any, should NTIA take to monitor and evaluate implementation practices? From a sustainability perspective, what role can collaborations, partnerships, and coalitions play? Please share examples of any existing impactful collaborations, partnerships, and/or coalitions.**

As noted above, Digital Equity Plans should employ a continuous improvement cycle to monitor and evaluate implementation and move toward sustainability. This cycle would engage feedback from stakeholders as building sustainability is all about adapting to what the community most needs.

**Community Feedback:** As States develop their plans, they are required to engage their communities. There should be a requirement that community input is once again gathered, assessed, and used to inform and, if needed, revise the Plan moving forward. Groups and individuals consulted by the State or who provided input during the planning phase should be sought for their feedback. However, a general call to the community should also be made. This should happen at least once midway through the Plan's implementation process to ensure the quantitative data, qualitative data, and community partners' and members' perceptions align during the implementation phase. Any identified gaps should be investigated, and if needed, activities altered to ensure goals are achieved. NTIA and States should consider outreach to and collaboration with intermediary organizations such as state libraries, state library associations, ALA, and similar organizations, to engage and extend their reach to specific communities.

**Transparency.** The process states use to select projects and award funds must be transparent. Each state should be required to host a website documenting the process. It should include:

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- All individuals who are serving in some capacity to oversee and manage the State’s Digital Equity Plan and the organizations they represent; not just the steering committee.
- A list of organizations and experts consulted to develop and update the plan.
- Meeting minutes posted in a timely manner.
- Data, reports, and other information gathered to inform the process and gathered as part of the implementation phase.
- List of the organizations (including subcontractors) who are receiving funds, their approved proposal, report updates, etc.
- Midway through the process, there should be an open feedback period where residents and organizations can submit comments. Comments should be made publicly available. The entity responsible for developing the plan should hold a webinar explaining the plan. This should be open to the public. The results of the open feedback should be made available to the public.

Links to these resources should be included on the BroadbandUSA State Broadband Leaders Network and the Digital Equity Leaders Network webpage.

Digital Equity is not a problem that one organization or group can solve on its own. Libraries will regularly collaborate or partner with other community or campus organizations to support specific digital equity needs for their community. Because libraries act as a community or campus hub, they frequently bring together multiple partners to support a specific community need. For example, the Memphis Public Libraries partnered with the First Tennessee Bank to create a centrally located facility at the library to create a small business center that serves as a “resource, referral, and distribution center for Mid-South businesses.”<sup>10</sup> Each organization brings its unique expertise, experience, and resources under one roof, making it easy for potential small business owners, entrepreneurs, and established small business owners to access the assistance they need from one location. In addition, the business center makes connections and referrals to other organizations in the community.

Digital equity coalitions also bring together and ensure that the unique experiences and expertise of diverse organizations, as well as the lived experiences of unconnected and Covered Populations, are actively included in the building and implementing of solutions. Coalitions can build a shared vision for a digitally equitable future for the community and help ensure that limited resources are used strategically to meet the community's goals.

Digital Durham was founded in 2016 by two librarians and a public school teacher who wanted to bring attention to the digital divide in Durham, North Carolina.<sup>11</sup> They wanted to create a Durham where “everyone is equally engaged in the digital world.” This coalition now has 11 members, including the library, Durham Public Schools, Durham Housing Authority, colleges and universities, and community organizations all working toward the established goal and sharing resources, such as digital navigators.

A forthcoming report from the Public Library Association with data from the 2022 Public Library Services for Strong Communities Survey finds that virtually all (more than 97%) have at least one partnership in place, most frequently with schools and other public entities.

## C. Digital Equity Competitive Grant Program

**Question 8: How should NTIA *define* success for the Competitive Grant Program? What outcomes are most important to measure? How should NTIA *measure* the success of the Competitive Grant Program, including specific measures? Are the measures of success the same or different from the Capacity Grant Program? If so, please elaborate.**

ALA appreciates the thoughtfulness of the staging and roll-out of the planning grants, capacity grants, and, finally, the competitive grant program. The Digital Equity Competitive Grant Program is a historic opportunity, far exceeding the funding provided by any prior program for digital equity. The competitive program is uniquely positioned to enable digital equity work across state boundaries and at scale. It can serve as a kind of “anchor” in a relay race to address outstanding gaps and supplement or expand from the planning and capacity grant programs. As a complement to other IJA investments, ALA recommends NTIA prioritize visionary, unique, large-scale, strategic, knowledge-producing, and/or replicable investments. Therefore, breadth and depth of reach is critical to assess when determining success. ALA proposes these principles for measuring success and prioritizing outcomes:

- Emphasize services to people, whether educational/informal learning, economic, health, or otherwise—as contrasted with projects that focus primarily on hardware or internet access. Historically most funding has been concentrated in these latter areas, rather than digital literacy, for instance.
- Include some very large projects that cannot be supported in typical grant programs – such as into the millions of dollars. This program represents an unprecedented opportunity to propel digital equity projects that otherwise could not be contemplated or pursued by local community anchor institutions and related public service organizations.
- Measure success by determining projects with an ability to scale and develop knowledge and practices applicable for the field at large now and in the years to come.
- Preference applicants that include some focus on developing infrastructure and sustainability for digital equity work, in addition to or instead of focusing only on providing direct services. For example, there might be a project about developing strategic collaborations and ongoing support for digital equity programs that includes producing resources and training as well as building capacity through a train-the-trainer model.
- Encourage and support the participation of smaller and less-affluent CAIs and libraries that already exist in underrepresented communities. They often lack funding and capacity to participate in federal initiatives but are critical to the success of reaching Covered Populations. Building capacity via existing community institutions means hiring and training staff to work in these schools and libraries and integrating these important connectors and leaders into broader networks.

Therefore, programs funded should approach the problem from a variety of positions, likely with varying needs assessments and goals. Again, while we understand and appreciate the need to gather data for assessment, to measure impact, and promote accountability, we ask that you not overburden stakeholders with intrusive and burdensome requirements. We also ask that data collection does not conflict with existing state library privacy statutes and federal privacy such as FERPA, and that the NTIA consider the long-term impact of the data they ask organizations to collect. Finally, we suggest that

reporting guidelines be simple. Smaller or less-affluent community anchors, including many libraries, lack staff resources to devote considerable time to any reporting requirements.

While the focus should remain on advancing digital equity with a focus on Covered Populations, some measures of success in the Competitive program may vary or be more specialized to address gaps or additional needs identified from the Capacity program.

An important goal for this program is providing seed corn for the next generation of efforts in digital equity. Thus, projects should be selected that are likely to provide new insights into strategy and practice for many years to come—for the entire country. Addressing direct problems is laudable, of course, but this is an exceedingly rare opportunity to move the entire field and narrative in a direction for the generation to come. Indeed, a national convening or research effort may be useful in helping to formulate this direction.

## **Question 9: What kind of activities or projects should the assistant secretary consider for inclusion in eligible projects and activities for the competitive grant program?**

The Competitive grant program is for eligible entities, including libraries, to promote digital inclusion and spur greater broadband adoption among Covered Populations. It also strongly encourages community collaboration. ALA recommends considering inclusion of funding for:

- Capacity-building and sustainability activities, particularly those geared to support smaller anchor institutions and entities with a track record of successful service and engagement with Covered Populations, such as with rural communities;
- Research and evaluation, including meta-analysis across NTIA-funded projects, as well as broader efforts including foundational research in digital equity necessary to develop and advance the digital equity field for many years to come;
- Academic libraries at degree-granting community colleges, colleges, and universities to increase their pool of student workers from Covered Populations to build student digital skills and provide workforce opportunities to expand capacity for library digital literacy efforts. Well trained and carefully supervised student employees could assist other students in building research confidence and becoming savvy information consumers (and producers) in a post-truth era by promoting essential concepts such as: information creation as a process, research as inquiry, scholarship as conversation, and searching as strategic exploration.<sup>12</sup>
- Outreach, marketing, and incentives to reach and encourage participation among Covered Populations;
- Mobile/remote training labs, phone support for learners, and potentially creative or unusual methods for extending reach across diverse and geographically dispersed communities; and
- Some percentage of total funds for administrative costs.

## **Question 14: What additional weight, if any, should NTIA give to proposed projects that align with the State, Territory, and/or Tribal entity Digital Equity Plans?**

ALA recommends that NTIA *not* give additional weight for alignment, but rather emphasize strategic, innovative, and longer-term focus in the Competitive program.

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## Measuring for Success and Transformative Impact

**Question 15: What are examples of past or current evidence-based or evidence-informed digital equity and/or inclusion projects or other relevant or similar projects that NTIA can showcase as a part of its technical assistance efforts to support applicants in identifying promising or evidence-based project models, partnerships, activities, and strategies to consider, replicate, and leverage lessons learned as applicable?**

Libraries nationwide have deep experience in meeting digital equity needs for people of all ages and backgrounds—including specific Covered Populations prioritized in the IJA—with unparalleled reach and trust across the nation. Because libraries have been doing this work for decades, there are models from libraries of every size and type across the nation that can be leveraged to support and advance digital equity. We offer one in-depth case study that showcases one rural library’s digital equity and inclusion projects related to digital skills, telehealth, information literacy, seniors’ aging in place, strong collaboration with local partners, and integration within existing systems.

Additionally, we highlight promising innovations from academic and school libraries and innovations around economic development. These examples showcase the critical work libraries do to promote digital equity for a variety of Covered populations in unique settings around the country.

### Small and Rural Public Library Case Study: Pottsboro Area Public Library

The Pottsboro Area Public Library, located in a rural community outside of Dallas, Texas, is one exemplar of digital equity and inclusion work taking place in libraries across the country. Many of Pottsboro’s 2,500 residents cannot afford home broadband and available Wi-Fi is often unreliable.<sup>13</sup> In response, the library devised innovative solutions and targeted areas of telehealth, senior services, expanded connectivity, and digital navigators to meet community needs. Pottsboro’s success was enabled through strong outside partnerships and additional funding.

#### Telehealth

Out of Texas’ 254 counties, 77 do not have a hospital. In Pottsboro, traveling to the doctor is a challenge for many residents as the nearest hospital is 30 minutes away, and there are no public transportation or ride sharing services in the area.<sup>14</sup> Additionally, the pandemic-induced shift to digital and virtual services further exacerbated Pottsboro’s existing connectivity challenges, and library staff consistently saw individuals in need of technology access and user-friendly assistance to reach healthcare providers. As a result, the library dedicated itself to becoming a telehealth resource. Initially, the library director provided her private office to patrons and walked them through the online process of finding and connecting with remote physicians; she then sought grant funding to help bridge the medical divide her neighbors faced.

Today, the library is home to a soundproof, medically equipped telehealth space with ventilation, lighting, a doorbell, and an outdoor iPad kiosk for patrons who haven’t completed preregistration. The library’s conversion of a storage closet to a telehealth space was made possible through a \$20,000 COVID-19 Health Information Outreach Award grant from the National Institute of Health’s Network of National Library of Medicine (NNLM) and a partnership with the University of North Texas (UNT) Health Science Center (HSC).<sup>15</sup> Patrons are able to refill prescriptions, link up with UNT physicians, and manage

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physical and mental health conditions. In addition, the library developed a community of practice for other libraries wishing to establish their own telehealth programs.

Libraries are uniquely positioned to offer telehealth services to ensure communities can access healthcare. In rural communities, libraries often provide the fastest internet connection in the area and act as a conduit connecting communities to essential services, skills building, and technical support to use emerging services.

## **Senior Services**

25% of the Pottsboro population is 60 years old or above.<sup>16</sup> The library provides a wide range of programs and services targeted to meet the needs of this Covered Population. Digital equity is a critical factor in helping seniors age in place. The library supported this goal in a variety of ways:

- Senior Planet technology classes taught by Pottsboro library temporary staff funded through grants. Classes are taught at the library, and on-site at surrounding senior living facilities and senior centers such as Celebration Living. Classes are promoted by the Texoma Council of Governments (TCOG) and Texoma Workforce Solutions.
- Free iN2L tablets to qualifying low-income seniors with one-on-one skills training, funded through the FCC's Emergency Connectivity Fund.
- A joint endeavor with the University of North Texas (UNT) designed to teach elderly patrons how to draw health-centric comics expressing their lives as they navigate ongoing physical disabilities and mental health diagnoses.

One important component of the senior services offered by the library is a digital navigators program. Digital navigators have been successful providing one-to-one help to individuals needing support with getting online, filling out forms, and learning how to use technology devices in communities across the country. Digital navigators can provide services in-person or by phone to address individualized needs.

## **Digital Navigators**

In Pottsboro, a combination of grants was secured to establish a digital navigator program with multiple components. For one, the library hired 15 teen employees to receive senior sensitivity training from SaferCare Texas and subsequently provide one-on-one support to senior patrons on navigating smartphones and other devices, use the library's digital book collection, and navigate online forms. As part of the sensitivity training, teens experienced simulations of age-related debilitations including arthritis, neuropathy, and macular degeneration. One teen digital navigator noted he "had a newfound respect for his grandfather because although he couldn't see or hear well, he could haul hay like nobody's business."

Another cohort of adult navigators utilized the NDIA Digital Navigators Toolkit<sup>17</sup> as the basis for their training and then trained the teen navigators. One adult navigator was assigned at the Multicultural Family Center, focused on assisting with emails and parent-teacher portals for families of color. Adult navigators provided one-to-one support with digital literacy and information literacy. For example, they also assisted qualified applicants apply for the Affordable Connectivity Program and taught them how to avoid scams.

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On an ongoing basis, Pottsboro employs a full-time digital navigator to continue with these critical supports for seniors and others, even making house call to help homebound users with their technology challenges. This work is made possible through a three-year NDIA/Google Digital Navigator Corps Program.<sup>18</sup> Pottsboro's digital navigator program offers insight into the library's work in supporting workforce development around aging-in-place in their rural community.

The digital navigator model has proven successful around the country - many programs have been funded through IMLS and NDIA to support digital literacy and resilience. Digital navigators help with workforce development, including employment search and application, information literacy, and creating connection points to family, friends, and civic life. Pottsboro's digital navigators allowed for empathy and community building alongside digital skills.

## **Expanding Connectivity Through Partnerships**

The strong partnerships the library developed across the local, state, and federal level make their digital inclusion work possible. At every turn, Pottsboro Area Library developed and leveraged partnerships with colleges (UNT, Texas A&M, Austin College), nonprofits and living centers, and wireless service providers to leverage library expertise and deliver support to targeted populations.

For example, the library joined forces with wireless service provider TekWave, strengthening internet connection to homes encircling the library edifice and driving freshly acquired hotspots out to houses near Lake Texoma. TekWave installed an internet tower permitting the library to check out free W-iFi routers to anybody within a one-mile radius; Pottsboro Independent School District children depend on the amenity to study and do their schoolwork. The library's partnership with TekWave also led to the construction of neighborhood access stations, which serve as permanent hotspots closer to where people live without connectivity. When someone connects to the Wi-Fi network using these access stations, the main landing page is the Pottsboro Library, connecting people to library resources if more assistance is needed. Tekwave and the library have partnered on several public/private grant applications leveraging respective expertise.

## **Stewarding Funding**

Libraries are cost-effective and efficient partners with a proven track record of stewarding public funding to advance digital equity and inclusion. By stewarding grant funding from UNT, IMLS, the National Network of Library Medicine (NNLM), Texas Humanities, TSLAC, and Google, the Pottsboro Area Library leverages its expertise to meet the telehealth, workforce development and digital skill building needs of the community.

The library received a two-year IMLS funded data visualization grant. The IMLS Data for Good (D4G) project is a data analytics and visualization program that provides training and support to library and museum staff/volunteers interested in implementing teen and adult programs centered on data collection and analysis. D4G matches trained adults or teens with non-profit organizations to answer data related questions and reveal valuable insights about their business or organization. In working with the non-profit organizations, adults and teens gain in-demand workforce data analysis skills, and experience in using visualization software.

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The library is also home to a scholastic esports program involving both Pottsville High School and Austin College in Sherman, Texas. The Pottsville Library lays claim to esports computers, credit of a \$50,000 grant from the IMLS, where kids game competitively.<sup>19</sup> Four of the gaming computers are open for public use, which has attracted younger patrons to the library and provides new options for children and young adults in an area where internet access is otherwise extremely limited. Young visitors can also utilize the library's 3D printer to put in orders for printed toys, play with the library's virtual reality headsets or Nintendo Switch. The library also hosted an outdoor "drive-in" video game contest in 2020.

This library has provided innovative services to rural residents and advanced digital equity for seniors, teens and youth, low-income families, and other unserved and underserved groups. Their use of funding, partnerships, and service deployment are a model in building equitable digital connectivity, literacy, and inclusion.

## Academic and School Library Promising Practices

Libraries located in K-12 schools, community colleges, and colleges and universities provide opportunities to introduce both current and emerging technologies to their communities, including students and teachers, to support their current curricular activities and can build critical digital skills to support future career goals. One way school and university libraries do this is through Maker Labs. The Norman High School Library (OK) Learning Commons provides a Maker Lab students use to work on a project with the help of an expert or on their own using various technologies available in the lab, including 3D printers and scanners, graphic design software, digital cameras, video creation and mixing and more.<sup>20</sup>

The North Carolina State University Hunt Libraries provides multiple services for faculty, staff, and students to explore current and emerging digital technologies. The Digital Media Production Lab, Maker Space and Data Experience Lab provide faculty, staff, and students workshops and one-on-one assistance as well as hands-on experiences to practice and build their digital skills with current and emerging technologies to support their educational experience and provide valuable skillset that can be leveraged for future employment opportunities.<sup>21</sup>

Project-based learning is an evidence-based education practice that centers learners' interests and goals while teaching relevant and applicable skills. Makerspaces in libraries reinforce self-directed learning and inquiry. These examples from academic and university library settings may be models for other contexts to adapt in training for digital skills and fostering digital resilience and lifelong learning.

In addition, many college and university libraries are training undergraduate and graduate students to provide substantial digital scholarship support, which gives them hands-on work experience, engages them in new types of research, and develops their skills with emerging tools and practices. For instance, student employees at the University of North Carolina Libraries Science Library's Makerspace provide 3D printing and 3D scanning consultations and instruction to faculty and students. Graduate students in the Undergraduate Library develop tutorials and teach workshops on digital media creation, including social media graphics and infographics. Graduate and undergraduate students in the Davis Library Research Hub provide consultations and project support on a range of tools, from Tableau to Python.

Academic libraries increasingly support the creation of Open Educational Resources -- educational materials made freely and legally available on the internet for anyone to reuse, revise, remix and



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redistribute. The use of OER can reduce the burdensome costs of course materials, the effects of which are felt most keenly by financially disadvantaged students. Moreover, in the hands of experienced teachers, OER can be the foundation for more active and inclusive learning environments which boost student engagement and persistence. More than 750 libraries at community colleges, colleges, and universities support OER include creating subject guides or other educational materials, searching for quality OER for faculty, advocating for library inclusion in OER activities on campus, and providing education and training to campus partners such as instructional designers, campus store managers, student government representatives, administrators, and advisors.<sup>22</sup>

At North Carolina State University, the Libraries Alt-Textbook Project<sup>23</sup> awards four types of grants to faculty to adopt, adapt, or create free or low-cost alternatives to expensive textbooks. Open Pedagogy grants support instruction that does something a textbook can't do. This might be creating a series of videos, designing a Wiki Education course, or experimenting with a way of teaching that's totally new. There are numerous articles with further information about academic libraries' leadership in digital skills building efforts.<sup>24</sup>

## Economic Development

Libraries Build Business (LBB)<sup>25</sup>, a national initiative of the ALA and supported by Google.org, worked with 13 public libraries to develop promising library-led models for small business development programs, with an emphasis on equity and inclusion. Digital equity and literacy were essential components of the initiative. In rural Maine, for example, the Topsham Public Library scheduled secure, one-to-one Zoom appointments with the CareerCenter in a private room. Library patrons could come to the library for these appointments and library staff would assist with getting them connected and using their camera and microphone. At the Broward County (FL) Library, individuals interested in starting a tech business learned about digital marketing, developing websites and apps, and other elements of developing a tech start up. The library also offered a co-working space with technology and equipment for entrepreneurs to use and engage with. Finally, the Los Angeles Public Library partnered with Cell-Ed to create two pathways featuring micro-lessons about business, community safety, and internet skills and have been specifically built for street vendors.

The 18-month program ultimately impacted 14,417 individuals who participated in more than 1,210 classes and workshops; received one-on-one help; used makerspaces and other hands-on creation labs; and checked out equipment and other resources during the 18-month grant period. The initiative provided needed support to those typically underserved by and underrepresented in small business activity: 77% of project participant survey respondents were women; and 64% were Black, Indigenous, and people of color.

As a result of this initiative, the Libraries Build Business Playbook, which includes “practical resources and advice, promising strategies and models, and inspiration for programming and services for any library, no matter their size or budget, to adapt in their context,” is available as a free resource.<sup>26</sup>

## Program Measurement, Evaluation, and Reporting

**Question 16: How should grantees define digital equity with respect to each of the Covered Populations? What does success look like for each of the Covered Populations? How should NTIA measure the effects of access to and adoption of, and meaningful use of the internet for each Covered**

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**Population? What examples of equity gap analysis and tools should the Assistant Secretary consider when measuring outcomes as they relate to each Covered Populations? To what extent should grantees disaggregate data within each of the Covered Populations to reveal the underlying trends and patterns? NTIA encourages stakeholders to provide the rationale for their comments, including available examples of studies, measures, outcomes, assessments and supporting information.**

ALA affirms definitions and frameworks developed by digital equity practitioners and advocates, including libraries and library organizations, provided by the Institute of Museum and Library Services (IMLS) and the National Digital Inclusion Alliance (NDIA).

Digital inclusion<sup>27</sup> means that all members of a community understand the benefits of advanced information and communication technologies; they have equitable and affordable access to high-speed internet-connected devices and online content; and are able to take advantage of the educational, economic, and social opportunities available through these technologies. As detailed by NDIA,<sup>28</sup> digital inclusion has five elements: (1) Affordable, robust broadband internet service; (2) Internet-enabled devices that meet the needs of the user; (3) Access to digital literacy training; (4) Quality technical support; and (5) Applications and online content designed to enable and encourage self-sufficiency, participation and collaboration.

Further, digital equity is a condition in which all individuals and communities have the information technology capacity needed for full participation in our society, democracy, and economy. Digital equity is necessary for civic and cultural participation, employment, lifelong learning, and access to essential services.

These definitions are broad and flexible enough to encompass all Covered Populations. As one moves from the fundamental precondition of meaningful access toward adoption and further toward application and resilience, the needed resources and supports to achieve digital equity become more customized to different populations and individuals. As library workers and other digital equity practitioners know well, groups and individuals start their learning journeys in very different places and have varied immediate and long-term goals.

Learners also may use multiple modalities throughout their learning journey to meet specific needs at specific times and to practice and reinforce skills that they have learned. There is no “one size fits all” for learners or for the libraries and other community-based entities that support them. A common theme, however, is that skills building frequently begins at the point of need. Library staff regularly work with individuals who are trying to solve an immediate need and lack the skills to complete the task on their own. Contextualizing a new skill for a person within the real-world is a highly effective teaching and learning modality. Learners are energized and motivated when they see a clear connection to their daily activities and their greater aspirations.

Measurements should capture steps along the journey, wherever possible, as well as the destination. These steps may include, for instance, awareness, familiarity, use, comfort, confidence, application, and transfer of skill from one task to another.

NTIA and States should work to strike a balance relative to the burden of data collection and disaggregation relative to the program benefit. The more information that is demanded, the more likely impacted community members and the smaller CBOs that serve them will choose not to or be unable to

participate. Because libraries serve heterogeneous audiences that include, but often are not limited to, Covered Populations, disaggregation can be difficult. Data should be gathered and presented in a way that protects an individual's right to privacy. PLA's Project Outcome surveys<sup>29</sup>, for instance, ask if a program participant feels more knowledgeable, confident, and plans to apply what they've learned. These individual metrics are important—and can be aggregated to show impact across a program or institutional offerings.

Tools also exist to measure the availability of and access to the internet, including Digital Equity Act Population Viewer<sup>30</sup> and the Microsoft Digital Equity Dashboard.<sup>31</sup>

**Question 17: What metrics and performance data infrastructure and data governance strategies and tools are needed to create a vibrant digital equity ecosystem ( e.g., metrics, digital skills, sustainability) to measure program effectiveness and effects for Covered Populations? What publicly available datasets and tools should NTIA and grantees ( e.g., States, Territories, non-profits, develop) enhance or support to benchmark and to track progress of grantee goals and objectives?**

The overarching goal should be to encourage the use of measurable goals and objectives as a tool to accomplish greater equity, not as an end in themselves. Given the rapidity with which the digital equity field is evolving, NTIA should refrain from endorsing or promoting any single assessment or measurement tool. Instead, NTIA should foster an atmosphere of flexible experimentation and rigorous creativity among states and other stakeholders. Existing baseline information should be used as a starting point for measures, along with any new needs assessments to fill gaps in the baseline. However, these metrics must also take into account that some community anchors and other institutions must balance the need to measure progress toward documented goals and protecting and safe-guarding the privacy and confidentiality of those we serve. In fact, forty-eight states have statutes which require libraries to protect patron privacy.

The Library Bill of Rights states that “All people, regardless of origin, age, background of views, possesses a right to privacy and confidentiality in their library use.”<sup>32</sup> Libraries believe privacy is essential to free inquiry in the library because it enables library users to select, access, and consider information and ideas without fear of embarrassment, judgment, punishment, or ostracism.”<sup>33</sup>

In addition, lack of privacy may affect a user's willingness to avail themselves of those services and programs that they want or require to further their digital equity goals. Some of the Covered Populations are reluctant or unwilling to share personal information because they mistrust how that information can be used because they have experienced or know someone that has experienced harm due to misuse of their personal information in the past.

Libraries have identified ways in which to measure the efficacy of their digital literacy programs while preserving their patron's privacy. PLA offers Project Outcome, which freely provides public libraries with simple surveys on essential library services and programs. Project Outcome helps libraries measure four key patron outcomes—knowledge, confidence, application, and awareness—in eight key library service areas, including digital learning, job skills, and economic development programs.<sup>34</sup>

PLA also conducts annual rotating surveys<sup>35</sup> related to public library technology services, staffing and diversity, and detailed information related to existing programs, services, partnerships and facilities. The

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2020 Public Library Technology Survey, which will be repeated in fall 2023, is particularly relevant to library digital equity assets and challenges.

The Association of College and Research Libraries (ACRL), a division of ALA, also has Project Outcome designed specifically to be used by college and research libraries. This free tool helps libraries measure outcomes and assess their impact in seven key service areas, including digital and special collections, instruction, space, events and programs, teaching support, technology, and research.<sup>36</sup>

Additionally, ACRL acquired the Threshold Achievement Test for Information Literacy (TATIL), an online information literacy assessment instrument which increases libraries' ability to advance equitable and inclusive pedagogical practices and environments. Based on the 2017 ACRL Framework for Information Literacy for Higher Education, TATIL's four modules focus on: evaluating process & authority, strategic searching, research & scholarship, and the value of information. TATIL helps educators identify student areas of strength and areas that need improvement, supporting evidence-based decision-making and inform actions for strengthening student outcomes.

In addition to using tools, organizations that are offering digital equity programs and support can also partner with academic institutions and/or researchers to assess the outcomes of their programs using a variety of qualitative research methods to ensure their programmatic goals are achieved.

There are other tools in the digital equity ecosystem that community anchors like libraries use to measure individuals' outcomes, including Northstar Digital Literacy, as well as other online assessments included as part of online training tools like LinkedIn Learning, Coursera, etc.

If States and/or the NTIA create tools to make new data available or to make existing data more accessible, the user interface to view, review, and analyze the data should be designed so that it can be used by organizations that do not have data analysts on staff. Many small and under-resourced CAIs could benefit from tools to access and analyze this data to gain greater insight into the community they serve and to measure the impact of their services.

**Question 18: NTIA will require regular grantee performance and progress reporting, e.g., semi-annually, project close out to monitor grantee implementation of funded projects and capture metrics, outcomes, and impact. How should NTIA measure grantees implementation of such metric tracking? To what extent should NTIA require standardized inputs, metrics, and measures in order to facilitate nationwide insights?**

We understand the need to gather data for oversight and accountability and to document the impact of the federal investments, but we ask that:

1. You balance that requirement with the need that libraries have to protect the privacy and confidentiality of their users. Many states have statutes that require libraries to protect patron's personally identifiable information (PII). There are ways in which program efficacy can be assessed without requiring the gathering and storing of PII. Libraries have used aggregated, anonymized data and proxy measures for specific demographic data of the patrons they serve. Examples can be found in ALA's response to Q17.

2. The reporting requirements should be simple, not place undue burden on recipients, and allow the state some flexibility for how best to identify how to measure the outcomes of their programs. Some of the Covered Populations are in rural areas or populations that can be hard to reach. To connect with these populations, smaller organizations may be best situated to reach out and provide targeted outreach activities that meet these groups' digital equity needs. However, robust or complicated data-gathering requirements could hinder these organizations from participating in the program, providing yet another barrier to Covered Populations gaining access to the digital equity supports they require.

In addition to collecting and analyzing quantitative data, ALA asks that you support and encourage qualitative data in program assessment. User experiences can increase our understanding of how easy or difficult the journey was to acquiring access and skills, areas for program improvement, different applications resulting from improved access and skills, among others.

## Digital Equity Strategies, Tactics, and Success Measures for Covered Populations

**Question 19: For each of the Covered Populations, what are proven strategies and tactics, projects or programs, with outcome-based measures and impacts, that promote and achieve digital equity?**

Libraries provide digital skills training and internet connection to everyone in their communities. Many library patrons are from a Covered Population, and the library provides no-barrier and judgement-free services, information access, referrals, and technology to their communities.

### Useful Tools and Resources

The library community has also created useful tools and resources to help libraries start, promote and support digital literacy training.

One such example is PLA's DigitalLearn,<sup>37</sup> which is an online hub for digital literacy support and training. DigitalLearn.org is a free on-demand collection of more than 30 self-paced video-based tutorials written at an elementary to middle school reading level to help inexperienced and low-literacy learners build their digital literacy skills. The online courses can complement the classes and one-on-one training library staff provide. The newest module supports enrollment for eligible patrons into the FCC's Affordable Connectivity Program (ACP). It also includes off-the shelf tools for trainers including facilitator guides, scripts handouts and hands on activities library staff can use to teach digital skills workshops in English or Spanish.

Many libraries pair PLA's DigitalLearn with PLA's Project Outcome. Libraries use this tool to measure participant outcomes. As stated before, Project Outcome is a freely available tool provided to public libraries. It includes simple surveys on essential library services and programs. Project Outcome helps libraries measure four key patron outcomes—knowledge, confidence, application, and awareness—in eight key library service areas, including digital learning, job skills, and economic development programs.<sup>38</sup> Similarly, ACRL has a Project Outcome specifically for college and research libraries, designed to help libraries measure outcomes and assess their impact in seven key service areas, including digital and special collections, instruction, space, events and programs, teaching support, technology, and research.<sup>39</sup>

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We have also previously noted ACRL's Threshold Achievement Test for Information Literacy, which increases libraries' ability to advance equitable and inclusive pedagogical practices and environments.

Another tool many public libraries utilize to support peer learning is Peer 2 Peer University (P2PU). The P2PU framework was created to cultivate peer learning communities in public spaces. The framework includes a facilitator, curated course materials, and study groups for people who want to learn with others on a specific topic. Learning circles are utilized by libraries worldwide to help their communities build their skills together.<sup>40</sup>

Beyond tools, we highlight a few examples of digital equity programs and outreach that are tailored to a selection of Covered Populations below, and stress that libraries work with members of each of the Covered Populations on a daily basis.

## **Aging Individuals**

The Nashville Public Library's (NPL) Digital Inclusion Program partnered with Comcast and senior service providers to provide devices, broadband, and skill training through a mix of remote, live, and one-on-one training focused on helping seniors develop basic digital skills and learning how to access patient portals and telehealth services. The 2018 Community Needs Evaluation Report<sup>41</sup> reveals that there are 10,625 persons aged 60 and over in poverty in Davidson County (where Nashville is located). These seniors do not have the financial means to acquire computer devices. To address this inequity, NPL's Digital Inclusion Team began to transform its live digital literacy curriculum for seniors into a virtual curriculum that included patient portals and telehealth. NPL partnered with Comcast, which provided devices and free internet, and senior service agency partners to reach seniors in Nashville. Telehealth survey data to date shows that:

- 98% of participants feel more knowledgeable about using computers and about Telehealth
- 98% feel more confident about trying Telehealth
- 100% intend to apply what they have learned in the Telehealth program
- 100% are more aware of the technology resources and services provided by the library
- 100% of program agency partners strongly agree that this is a valuable service for the seniors they serve

Building on an existing digital equity foundation and trusted library infrastructure to customize tools and applications for a specific Covered Population is a cost-effective and sustainable practice to be leveraged when possible.<sup>42</sup>

## **Incarcerated individuals:**

Some college and university libraries are providing digital and information literacy skills to incarcerated students. For example, 1,000 students housed within six Texas Department of Criminal Justice prisons receive library resources and services from Lee College's (TX) higher education in prison program. As the program's librarian states, "Part of the authentic higher education experience is developing information literacy skills. These skills are even more vital for our incarcerated students since many of them have been inside so long, they have no experience with any sort of technology."<sup>43</sup>

This need will only continue to grow. Effective July 2023, incarcerated people will again be eligible to receive Pell Grants to support their education, ending a 29-year ban. Academic libraries are preparing to support an estimated 500,000 newly eligible incarcerated students who could enroll in college in-prison programs. While higher education in prison programs are well-equipped to address educational and skills-based inequities, they often lack access to the digital technologies necessary for improving the digital literacy and technological savvy of their students. Operating a college-in-prison program is particularly challenging due to strictly controlled access to information through media review and limitations on access to technology. Librarians are and will continue to be important to ensure incarcerated students have the information and digital literacy skills they will need to thrive in school and are prepared for the workforce.

Further, digital supports and skills building that support family and community connection should be eligible for program support. Brooklyn and Seattle public libraries, for instance, have coordinated with correctional facilities and local governments to support video visits to strengthen connection and literacy skills building.<sup>44</sup> More school, academic, and public libraries may be able to provide this type of social connection and preparation for and support post-incarceration with digital equity investments.

#### **Veterans:**

At Purdue University Libraries, business librarians work with veterans taking part in the Entrepreneurial Bootcamp for Veterans with Disabilities as they develop marketing plans and provide additional support by phone, email, and online including access to relevant library databases and software and build relevant and transferable digital skills needed for starting and maintaining a business. Additional examples of specialized support for Veteran students through higher education libraries and librarians is shared in subsequent questions.

#### **Individuals with disabilities:**

In order to ensure that members of their community who have disabilities can fully participate in the digital economy, libraries of all types offer technologies that allow people to access and use technology independently. For instance, the Cleveland Public Library provides technology devices, software, and training that allow members of their communities with disabilities to read books, use email, search the internet and so much more. Tools include screen readers, text and screen magnifiers, braille translators and printers, adaptive mice and keyboards, etc. at locations across their library system.

Accessibility audits and purchase of technology that better enables accessibility should be eligible for funding and part of needs assessments and asset mapping. The 2021 Public Library Staff and Diversity Survey found that about 60% of public libraries conduct periodic reviews of their websites and digital presence, and two-thirds of public libraries do reviews of physical spaces for accessibility.<sup>45</sup> Building staff training on such technology resources and community awareness should be eligible for funding.

#### **Individuals with a language barrier, English learners:**

The Jefferson County Public Library (JCPL) in Colorado launched its Digital Equity for Spanish Speakers program to help Spanish-speaking patrons learn how to use a computer for basic tasks such as

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sending/receiving emails, navigate the internet and create online accounts. The program addressed digital equity by breaking down barriers such as language, transportation, and exposure to technology.

JCPL recognized a divide between those who have affordable access, skills and support to effectively engage online and those who do not. This project is essential to ensure that all residents, including the most disadvantaged, have access to and use of Information and Communication Technologies. JCPL worked with education partners to assess community needs and partnered with Title I schools that have high populations of immigrant Spanish speakers. Community engagement identified specific opportunities to remove barriers for Spanish speakers including access to technology, access to library locations, challenges with scheduling and language comprehension.

In 2022, JCPL launched a six-week course for parents in Spanish. The curriculum covers computer basics using DigitalLearn Resources by the Public Library Association. Importantly, the library provided Chromebooks for participants to take home for the duration of the course. JCPL held two full courses of eight people each. There are four schools waiting to enroll parents in 2023. After the course, students were able to:

- Start a computer, effectively use a mouse and keyboard and access the internet
- Create and manage an email account
- Access [jeffcolibrary.org](http://jeffcolibrary.org) to learn about library offerings
- Create accounts for our digital resources
- Attend video conferences safely

Project Outcome was used to measure impact. Courses averaged 4.7 out of 5 on a Likert scale across all outcomes.<sup>46</sup>

This program is an example not only of efforts by libraries to reach and coordinate services for this Covered Population, but also the need to think not just of individuals but also of families and other supportive networks of organizations and resources to be coordinated and leveraged. K-12 school and public libraries are well-positioned to enable family engagement strategies.

**Question 20: Youth and young adults are members of each of the Covered Populations except for Older Americans. The COVID-19 pandemic had a devastating impact on academic achievement, physical and mental health, and earning opportunities for our youth and young adults. How can NTIA encourage and measure the effects of investments in our youth and young adults?**

Libraries have frameworks that they use to engage students in building information and digital literacy skills and instill a mindset of lifelong learning. Many of the programs use the students' personal interests and goals, combined with formal and informal learning opportunities to achieve new skillsets.

## **K-12 Students**

The *AASL Standards Integrated Framework*, from the American Association of School Librarians (AASL),<sup>47</sup> includes standards school librarians can use with students. It reflects a comprehensive approach to teaching and learning by demonstrating the connection between learner, librarian, and library standards. The framework includes principles related to how school librarians can use active learning to



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prepare students for college and workforce readiness, information and digital literacy, integration of technology into learning, etc.

Through the Public Library Association's Inclusive Internship Initiative, teens across the country are exposed to new ways of thinking—both about themselves and the world—by working at their local libraries. Through the program, libraries offer paid, mentored internships to high school-aged students from diverse backgrounds, and the interns each develop a connected learning project, for example creating a digital resource guide such as an interactive YA Diverse Book List that links to the library's catalog so patrons can easily check out titles and a space exploration virtual reality program. Some projects have focused explicitly on mental health and building social connections.<sup>48</sup>

For example, at the Tri-County Regional Vocational Technical High School in Massachusetts, the school library media center staff supports students in the school with career pathways and resources to support social and emotional wellbeing. The media specialist developed a unit to augment digital literacy skills while also helping students to be in tune with the impacts of using their mobile devices on their social, emotional, and physical health. After the unit, students reported feeling less anxious, having better sleep, and improving their communication skills. This unit and the initial feedback are an encouraging step toward creating responsible ways to engage digital skills and digital literacy holistically with teens and youth. Beyond building the necessary digital skills for college and career readiness, digital literacy should consider balance with health and social and emotional learning.

## College Students

At U.S. postsecondary institutions, academic libraries are one of the largest employers of student workers. When well designed and implemented, on-campus employment is recognized as a high-impact educational practice,<sup>49</sup> serving as a high-quality, developmental experience. Such programs provide students with meaningful learning and engagement opportunities, boost retention, and build career-readiness skills.<sup>50</sup> Student workers in academic libraries gain and transmit valuable digital skills as peer research coaches, guides to Makerspaces, and more.

The University of Portland Library Bridge program invites local high school students to learn about the university library to support their transition to college. It focuses on minoritized students and those who would be the first in their family to attend college. The six university students hired as First-Generation High School Ambassadors guide the high school outreach program, providing peer tours, while developing a greater depth of understanding about library resources (including research databases) and felt empowered in their own library use.<sup>51</sup>

At Tacoma (WA) Community College (TCC), where racial/ethnic minority students are the majority, the library's Open Educational Resources project has included students as engaged participants and meaningful long-term partners from the beginning. In 2020-21, TCC students save more than \$1 million annually in textbook costs. "Incorporating student voice at all stages of an OE [open education] campaign increases not just feelings of belonging, but a genuine sense of student agency and ownership over the creation of a more just and engaging college experience."<sup>52</sup>

Because student veterans may have difficulties transitioning from a military style of technical learning and a hierarchical organizational structure to a university learning environment, colleges and

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universities provide specialized support. At the University of Alabama (UA), the library participates in the one-credit course, “Military to College: Making the Transition,” which is designed to help students learn the skills to transition to college academically, culturally, socially, and financially. The UA library embeds two library classes per semester into the course to introduce students to an academic library environment and gives a brief overview of the research process and locating and evaluating sources. There is also an online course guide with links to key library resources, contact information for assistance, and web resources for veterans.<sup>53</sup>

The University of Nevada, Las Vegas Libraries showcased student veterans as researchers through a scholarship symposium. Students reported that they were grateful to have a platform for sharing their research, found it helpful to receive written and video instructions on how to prepare a poster or podium talk, and appreciated the opportunity to experience academic presenting as students.<sup>54</sup>

Department of Defense Morale, Welfare and Recreation (MWR) Libraries provide essential digital equity resources and support for Service members and their families, including students, as well.

## Teens

The YOUmedia model is an out of school time learning space designed for teens where they can hang out, mess around and geek out on projects that align to their personal interests and passions including creating their own music, video, 2D and 3D design, photos, podcasts and more with guidance from skilled mentors and peer interactions. This model is based on research by Dr. Mimi Ito at the University of California-Irvine. “YOUmedia was designed to address new implications for youth interaction and learning with digital media by becoming a model “out-of-school” environment created by and for teens.”<sup>55</sup> This model has been replicated in public libraries and other CAIs across the nation.

**Question 21: To ensure all learners (youth, adult, incarcerated, etc.) have access to the opportunities that technology unlocks, how should NTIA promote a baseline or fundamental standard for digital literacy for all learners? What kind of baselines should NTIA's grant programs strive to achieve and should the intended outcomes be based on a type of standard which includes varying levels of digital skills, such as pre-basic, basic, intermediate and advanced? If so, please elaborate.**

Library staff regularly see mismatches in skills for adults and youth, which can range widely. The most common and consistent, however, is the need for basic digital skills. Workplace skills training programs often assume a basic level of digital literacy that job seekers may not possess.

Furthermore, digital literacy must be built on basic literacy and extend beyond technical skills to include critical thinking, problem-solving, and a mindset of lifelong learning. Technology is constantly changing, and residents need to stay abreast of these changes to stay connected, adapt and use new devices, platforms, and services. Sustainable broadband adoption and full participation in the digital economy demands increased attention on skills building at all levels.

Participants who lack these basic skills will not be considered for jobs, training programs or other educational opportunities. As such, there is a critical need for training that addresses baseline knowledge, so that patrons can acquire the basic skills they need to access existing education and training programs or online resources. Libraries are one of the only places where this type of basic skills training is available free of charge.

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Building digital skills is a vital component of digital equity. Digital literacy and skill development work best with instruction to help learners use technology to accomplish their goals and are not tied to a specific tool. Overall, 88.3% of public libraries offer digital literacy training, with a particular focus on foundational skills, including general computer (82%), software (76%) and internet (83%) use.<sup>56</sup> Libraries meet learners where they are across age and diverse backgrounds.

Many libraries also offer digital skill building through online programs such as DigitalLearn or Northstar Digital Literacy. Northstar Digital Literacy is a program that assesses computer and internet skills, provides specific instruction for skills that need improvement, and offers certification through proctored assessments for each skill that needs improving.

## K-12 Schools

The AASL *National School Library Standards for Learners, School Librarians, and Libraries* (2018) codify digital skills necessary to be considered "digitally literate." The Learner Standards provide a framework of learner competencies anchored by six Shared Foundations—Inquire, Include, Collaborate, Curate, Explore, and Engage—highlighting the standards' core educational concepts. Digital literacy is woven into each Shared Foundation for school librarians to teach students and collaborate with other educators. This way, digital literacy becomes an integral part of each content area rather than a stand-alone skill. Teachers, administrators, parents, and others are also learners. Therefore, school librarians work with the entire community to support digital literacy and digital resilience for lifelong learning.

School librarians teach learners to have the capacity to change and grow, explore, curate, and adapt in an ever-changing digital and information landscape. Critical thinking, analysis, and evaluation to identify opinion, bias, and false or inaccurate information enable students to effectively use local, national, and global sources. School librarians teach the ethical use of information, to respect copyright, intellectual property, and creative commons which translates as technology evolves.

In addition, the New York Information Fluency Continuum provides a continuum of information literacy and inquiry skills that are essential for all students across all grade levels to learn. From the About this Project letter: "school librarians and educators prepare each one of our students to develop the skills and agency to be both critical consumers and creators of information as they navigate and succeed in their academic and personal lives."<sup>57</sup>

Civic Online Reasoning (COR) is an American Association of School Librarians (AASL) Best Digital Tool for Teaching and Learning. Certified school librarians use the lessons and resources provided by SHEG to support them in teaching digital literacy. An important concept is teaching online lateral reading.<sup>58</sup>

## College Students

The Association of College and Research Libraries has the Framework for Information Literacy for Higher Education.<sup>59</sup> Released in 2015, community colleges, colleges and university libraries use this framework with faculty to connect information literacy with student success and learning. Information literacy "is the set of integrated abilities encompassing the reflective discovery of information, the understanding of how information is produced and valued, and the use of information in creating new knowledge and participating ethically in communities of learning."<sup>60</sup> To support this framework the community has come

together to create and share tools that allow librarians and other information literacy professionals to share their curriculum and assignments. These tools include:

- **CORA – Community of Online Research Assignments.** CORA is an open educational resource (OER) for librarians, faculty, and other educators. The tool includes research assignments and a Teaching toolkit featuring “a wide range of resource types, including pedagogy/theory, assessment, classroom activities, technology tips, subject guides, citation tools, and information literacy tutorials.”<sup>61</sup>
- **PRIMO – Peer-Reviewed Instructional Materials Online Database.** PRIMO is a repository to promote and share “peer-reviewed instructional materials created by librarians to teach people about discovering, accessing, ethically using and evaluating information in networked environments.”<sup>62</sup>

## E. Ensuring that Equity is Achieved in BEAD

**Question 22: How can NTIA best ensure that States and Territories that receive funding under BEAD and Digital Equity Programs are closely aligning their planning efforts to close the equity gaps for all Covered Populations? How can NTIA work with the States, Territories, and their communities to promote the collective impact and outcomes between BEAD's Five-Year Action Plan and States' Digital Equity Plans to achieve equity for its Underrepresented Communities/Covered Populations?**

NTIA should consider strategies for encouraging states to align their BEAD programming with the digital equity goals and activities laid out in their Digital Equity Plans. Because some states may not need to spend all of their BEAD program dollars on broadband technology and access per se, aligning BEAD with Digital Equity Plans will help states identify opportunities for innovation in using BEAD funds to advance digital equity goals, especially digital skill-building.

NTIA should foster such innovation and should seek input from states and other stakeholders about specific mechanisms for doing so as the implementation of both programs moves forward. Guidance for both programs should emphasize that BEAD resources can be used to support DEA state plan strategies for increasing equitable access and adoption of digital resources, through digital skill building and digital navigation services for Covered Populations through community anchor institutions.

DEA planning templates should clearly call for the use of BEAD analysis in DEA plans and for DEA plans to then pick up the strategic line for building digital adoption through targeted digital skill building and digital navigation services in communities where BEAD has laid new infrastructure.

As part of the State’s plan there should be a formal process that States undertake to ensure that their digital equity goals are being met. Later funding years should be prioritized to meet needs that are unmet in earlier funding cycles and also make adjustments based on lessons learned.

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## Ensure Workforce and Subcontracting Opportunities are Inclusive of Underrepresented Communities/Covered Populations

**Question 23: How can NTIA encourage the design and implementation of Digital Equity Programs to support and advance the economic mobility of members of Underrepresented Communities/Covered Populations to support BEAD implementation and broader economic outcomes ( e.g., through new skills, upskilling, re-skilling, career pathways, and other high-quality workforce development activities)?**

Libraries provide a wide array of programs that support economic development, digital skills training, workforce readiness, career pathways, and entrepreneurship for underrepresented communities. By including libraries in state digital equity plans and funding eligibility, the NTIA can advance economic mobility by leveraging existing programs, resources, and capacity. Libraries offer innovative and responsive programs, engagement with emerging technology, and connections to others in the community. With these resources in place, libraries prepare individuals for 21<sup>st</sup> century college and career readiness and propel economic opportunity. NTIA should allow for flexible solutions and invest in existing systems and encourage and support organizations in building a stronger workforce for their community.

Libraries provide digital technology (high-speed internet, computers, specialty software, etc.) and traditional resources (books and databases, training, workspaces, and individual assistance, etc.) to support job seekers, small business owners, and entrepreneurs. Notably, almost 1 in 2 public libraries provide services to entrepreneurs who wish to start or grow their business.

We highlight a recent initiative, the Digital Literacy Across Rhode Island program, which served 2800 participants over the 18 months of the initiative. 350 NorthStar certifications and badges were earned. This example demonstrates a promising model for a state agency to work in partnership with local and regional partners, leverage federal funding, and collaborate with public libraries across the state. The initiative is a partnership of the Rhode Island Office of Library and Information Services and Providence Public Library (PPL), funded by IMLS and American Rescue Plan Act (ARPA) funding. Scaling from a program model offered by Providence Public Library to more than a dozen library systems across the state, this project offered digital literacy resources and programming to hundreds of individuals including those from Covered Populations. Aging individuals, Veterans, individuals with disabilities, English learners and those with low levels of literacy, and individuals from a racial or ethnic minority group, among many others, took part in these programs and services.

Participants received basic and advanced digital literacy at over a dozen libraries and community partner organizations between one-on-one virtual and in-person meetings and structured classes. From using messaging and social media to connect with friends and family, to resume building and learning to use a keyboard to be able to take the GED, many Rhode Islanders gained skills and confidence to be digital citizens. Patrons received support with digital health resources, public assistance and economic relief, education and employment resources, community programs and services, and well-being and social interaction. PPL specifically enlisted past participants of the digital literacy programs to become program facilitators. The programs directly invested in the community by ensuring community members were facilitating the digital literacy programming. One library partnered with a rehab center located just up the road to provide resume building and online job application assistance. Many rehab members only had

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access to cellular devices and not computers. Rehab center members utilized the library's computers to build resumes so they could then apply to jobs on the devices they had easy access to, their phones. This programming allowed rehab members to not have to use the library's computer every time they wanted to apply for a job, they could simply access their resumes on their phones.

Program outcomes had a direct impact on the economic mobility of participants. One participant developed the foundational digital skills required to take the GED test. After learning that the GED test was no longer offered on paper, she realized she would need to learn how to use the computer, keyboard, and mouse and went to the library to practice these skills and prepare for the GED. Another participant passed 15 NorthStar assessments and went on to complete the Microsoft Office Specialist program offered by PPL in partnership with Roger Williams University. These digital skills were directly beneficial to better jobs and career pathways; they also indirectly built essential confidence and agency.

Libraries provide targeted community support to foster economic mobility via skill building and access to essential tools. The Yakama Nation (WA) Library, a cohort member of ALA's Libraries Build Business initiative, provides internet access and reference support to low-income, Alaskan Native and American Indian populations to conduct their business research and is also developing an entrepreneurial makerspace. Another cohort library, the Richland Library in Columbia (SC), has a multimedia studio, woodworking space, and a demonstration kitchen.

Libraries are also creating programs that **aid the reentry community, a Covered Population**. For example, the Gwinnett County Public Library (GA) has created the New Start Entrepreneurship Incubator designed to help community members who have served time in jail or prison to create their own businesses. Participants receive assistance with developing business ideas, learn what is needed to run a successful business, and receive one-on-one support from successful entrepreneurs and business experts.

Similarly, Fresh Start @ Your Library began at the Long Branch (NJ) Public Library to provide community reentry support. In Fall 2019, the New Jersey State Library scaled the program with grants funds from the Institute of Museum and Library Services, and in partnership with the New Jersey State Parole Board, New Jersey Department of Labor and Workforce Development, Long Branch Public Library, and the Free Library of Philadelphia (PA).

**Libraries in higher education support entrepreneurs**, as well, by offering embedded librarians at campus business incubators, databases and other resources, market intelligence, assistance with patents, and more. The Washtenaw (MI) Community College library, for instance, provides print and online resources, as well as one-on-one coaching and programs to empower small business success in their community. Additionally, students are employed in libraries of all types. Such experience is often their first exposure to a professional or office-type environment and can be formative. Opportunities exist, especially for student-employees in Covered Populations, to leverage these experiences to increase school graduation rates and the likelihood of success in their first career job. Additionally, hiring student workers from Covered Populations at academic libraries at degree-granting community colleges, colleges, and universities can expand their digital literacy efforts. Part-time student employment can be expanded and broadened into a formal workforce fellowship program. With support, more academic libraries could provide students with formal training, carefully designed workshops, and novel work experiences intended to develop in student employees a number of important skills related to digital

equity. Well trained and carefully supervised student employees assist other students in building research confidence and becoming savvy information consumers (and producers) in a post-truth era by promoting essential concepts such as: information creation as a process, research as inquiry, scholarship as conversation, and searching as strategic exploration.<sup>63</sup> Student employees from Covered Populations are better prepared for a full-time professional position upon graduation, regardless of their major.

**Question 24: How can the BEAD and Digital Equity Programs support and promote youth employment and skills building? What kind of programs, projects, and partnerships—based on existing evidence—would encourage and prepare youth to have the digital skills needed to be workforce-ready, but also to enter internet and internet-related careers?**

BEAD and Digital Equity programs can support and promote youth employment and college and career skill building through public, school, and academic libraries. Libraries provide high-quality information resources, access to emerging and relevant equipment and technology for people to learn about and test. Libraries also provide programming on entrepreneurship, workforce development, digital literacy, and more. Many libraries are targeting youth and teens with entrepreneurship programming that leverages project-based learning to teach and practice digital literacy, financial literacy, marketing and communications, sales, and business concept development. These entrepreneurship skills are transferable skills and include risk assessment, creative and critical thinking, innovation, collaboration, and effective, multi-modal communication. For example, the Orange County Library System in Florida offers the BizKids Club for youth aged 9-14 to engage them in interactive activities to create a business plan, design marketing materials, and pitch their business ideas. Learners build confidence and skills that they can apply to future college, career, or entrepreneurship. The library responded to the local Board of County Commissioners' call for programming targeting areas of youth diversion, early childhood education, and youth mental and socioemotional health and development with this proposal. They collaborated with local schools, housing developments, and the Boys & Girls Club for outreach and support.

At Allen County Public Library (ACPL) in Indiana, teens engage in a summer employment program called Team Read and receive work experience and college and career planning support. Teens engaged in entrepreneurship modules and worked in groups to target a community need and explore concepts of social entrepreneurship. ACPL's entrepreneurship programs grew out of a partnership with the Northwest Indiana Innovation Center. Similarly, Las Vegas-Clark County Library District in Nevada offers a pitch competition program for teens aged 12-18 in which teens use the library's makerspace and resources to create a product or prototype. The library identifies business mentors in the community who work with teens on developing their business concept and business plan, then prepare for a strong pitch and other marketing.

The Baltimore County (MD) Public Library (BCPL) now offers their popular series, Entrepreneur Academy, for teens. The successful series is a partnership with the Enoch Pratt Free Library, local Small Business Development Center, and the CASH campaign of Maryland, and has been offered in English and Spanish, in-person at various branch locations, and virtually. The program for teens was piloted in 2022 and continues regularly. The goal of the program is to introduce teens to a career path they might not have considered before. Programming gets teens thinking about their skills and what they like to do as well as what types of business could improve their communities. In the Academy, teens identify a

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problem a business will solve, develop a mission statement, and develop a marketing plan. Teens also develop a business pitch and as preparation practice pitching using “As Seen on TV” items. BCPL also plans to offer the first middle school version in the coming months and host a pitch competition for participants. Judges will be representatives from the library, middle school and the chamber of commerce.

These innovative programs were successful with strong partnerships and collaboration at local, regional, and state levels, as well as in coordination with state and national priorities.

In addition, school libraries prepare PK-12 students with critical digital literacy and resilience training, connection to emerging technologies, and opportunities to apply digital skills to relevant schoolwork. The Bonny Eagle Middle School Library staff in Buxton, Maine, works with social studies teachers to teach students about using the internet and databases, including evaluating websites for quality and bias and being able to spot disinformation and phishing. In Connecticut, the Naugatuck Valley Community College, a Hispanic Serving Institution, and Waterbury Public High School librarians partnered to develop and deliver an information literacy instruction program for high school students to ensure they had the skills needed to be successful when entering college. This is part of a larger program that is preparing students for success in post-secondary education. The program is made possible by the GEAR UP grant from the U.S. Department of Education, which supports programs that “increase the number of low-income students who are prepared to enter and succeed in postsecondary education.”

Additionally, the Iditarod Area School District (AK), a 2021 Innovative Approaches to Literacy (IAL) grant recipient, proposes to build capacity to improve students’ academic performance and preparation for economic participation and success, through the implementation of the Iditarod Trail project. The project will improve and expand seven school/community libraries/media centers; expand literacy-building activities by updating technology and extending hours for working families; implement an updated curriculum to raise student reading levels; and improve Reading and English/Language Arts instruction. The project aims to increase digital literacy for all participants as part of the library updates. The project includes professional development, research-based reading program and is supported by a professional librarian. The school district serves very small and low-income communities; as a result, school libraries also serve as the community libraries; as a result, proposed improvements from this project will impact entire families. One specific aim of the project is to develop an educated workforce within each community to ensure that the unique cultures have the resources to survive, and students can earn a living wage.

These library-led programs center the community’s needs and work with existing community partners to provide highly-relevant programming and services to youth, focusing on future-oriented skill building for college and career. Teaching entrepreneurship skills includes many highly transferable skills such as critical thinking, creativity, communication, risk assessment, and use of new technologies. Participants gain experience and confidence as they apply new skills to a relevant project.

## Conclusion

ALA thanks the NTIA for the opportunity to comment and provide input on the development of Digital Equity Act Programs. Thank you for your consideration and review of our comments.



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<sup>1</sup> Orange County Public Libraries. WIFI On Wheels. <https://ocpl.org/WifiOnWheels>

<sup>2</sup> NTIA. Digital Equity Plan Guidance. [https://broadbandusa.ntia.doc.gov/sites/default/files/2022-09/Digital\\_Equity\\_Plan\\_Guidance.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2022-09/Digital_Equity_Plan_Guidance.pdf)

<sup>3</sup> Sentinel Tribune. (2023). "Library holding listening sessions on the future of internet in Ohio." <https://www.sentineltrib.com/2023/04/03/library-holding-listening-sessions-on-the-future-of-internet-in-ohio/>

<sup>4</sup> NDIA's State Digital Equity Planning Toolkit provides significant useful detail and examples for outreach and engagements: <https://www.digitalinclusion.org/state-digital-equity-plan-toolkit/>

<sup>5</sup> Public Library Association. 2020 Public Library Technology Survey. <https://www.ala.org/pla/sites/ala.org.pla/files/content/data/PLA-2020-Technology-Survey-Summary-Report.pdf>

<sup>6</sup> Texas State Library and Archives Commission. "Texas Public Libraries: Serving Communities to Enhance Digital Literacy." [https://www.tsl.texas.gov/sites/default/files/public/tslac/ld/digitalliteracystudy/TSLAC\\_Digital\\_Literacy\\_Report\\_Final.pdf](https://www.tsl.texas.gov/sites/default/files/public/tslac/ld/digitalliteracystudy/TSLAC_Digital_Literacy_Report_Final.pdf)

<sup>7</sup> Idaho Commission for Libraries. "Digital Inclusion at Your Library July 2022." <https://libraries.idaho.gov/wp-content/uploads/Digital-Inclusion-at-Your-Library-Survey-Report-2022.pdf>

<sup>8</sup> NTIA. Digital Equity Plan Guidance. [https://broadbandusa.ntia.doc.gov/sites/default/files/2022-09/Digital\\_Equity\\_Plan\\_Guidance.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2022-09/Digital_Equity_Plan_Guidance.pdf)

<sup>9</sup> NTIA. BroadbandUSA. <https://broadbandusa.ntia.doc.gov/resources/digital-inclusion>

<sup>10</sup> Memphis Public Libraries. <https://www.memphislibrary.org/learn/small-business/>

<sup>11</sup> Digital Durham. <https://digitaldurham.net/about-us>

<sup>12</sup> Framework for Information Literacy for Higher Education. Association of College and Research Libraries/American Library Association (2016), <https://www.ala.org/acrl/standards/ilframework>

<sup>13</sup> Texas Observer. (2021). "Beyond Books in Pottsboro." <https://www.texasobserver.org/beyond-books-in-pottsboro/>

<sup>14</sup> Network of the National Library of Medicine. <https://www.nlm.gov/podcast/virtual-health-a-story-from-region-3>

<sup>15</sup> American Libraries. (2021). "Healthy Distance: Telemedicine brings house calls to local libraries." <https://americanlibrariesmagazine.org/2021/05/03/healthy-distance-libraries-telemedicine/>

<sup>16</sup> U.S. Census Bureau. American Community Survey. <https://data.census.gov/table?q=75076&tid=ACSST5Y2021.S0101>

<sup>17</sup> <https://www.digitalinclusion.org/wp-content/uploads/2021/09/Digital-Navigators-Toolkit-Final.pdf>

<sup>18</sup> Library Journal. (2022). "Pottsboro Library Receives National Digital Navigator Corps Grant." <https://www.libraryjournal.com/story/pottsboro-library-receives-national-digital-navigator-corps-grant>

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- <sup>19</sup> Library Journal. (2021). "Connecting the Last Mile." <https://www.libraryjournal.com/story/Connecting-the-Last-Mile-Libraries-Find-Innovative-Solutions-for-Broadband-Access-covid-19>
- <sup>20</sup> Norman High School Library Learning Commons. <https://sites.google.com/norman.k12.ok.us/nhs-library/home>
- <sup>21</sup> North Carolina State University Libraries. <https://www.lib.ncsu.edu>
- <sup>22</sup> 2019 ACRL Academic Library Trends and Statistics Annual Survey. <https://crln.acrl.org/index.php/crlnews/article/view/24814/32643>
- <sup>23</sup> NC State University Libraries. Alt Textbook Project. <https://www.lib.ncsu.edu/alttextbook>
- <sup>24</sup> [http://crl.acrl.org/content/75/2/162.abstract/reply#crl\\_el\\_145](http://crl.acrl.org/content/75/2/162.abstract/reply#crl_el_145);  
<http://www.alastore.ala.org/detail.aspx?ID=11995>; <https://www.gvsu.edu/library/km>;  
<http://www.ala.org/acrl/sites/ala.org/acrl/files/content/Davidson%20web.pdf>
- <sup>25</sup> American Library Association. Libraries Build Business: <https://www.ala.org/advocacy/workforce/grant>
- <sup>26</sup> American Library Association. Libraries Build Business: <https://www.ala.org/advocacy/workforce/grant>
- <sup>27</sup> IMLS. Building Digital Communities: A Framework for Action. <https://www.imls.gov/sites/default/files/publications/documents/buildingdigitalcommunitiesframework.pdf>
- <sup>28</sup> National Digital Inclusion Alliance. <https://www.digitalinclusion.org/definitions/>
- <sup>29</sup> Public Library Association. Project Outcome. <https://www.ala.org/pla/data/performance measurement>
- <sup>30</sup> United States Census. Digital Equity Act Population Viewer: <https://mtgis-portal.geo.census.gov/arcgis/apps/MapSeries/index.html?appid=a0013a9dcbb9419e855f563d78e892ef>
- <sup>31</sup> Microsoft. Digital Equity Dashboard. <https://app.powerbi.com/view?r=eyJrjoiM2JmM2QxZjEtYWEzZi00MDI5LThlZDMtODMzMjhkZTY2Y2Q2liwidCI6ImMxMzZlZWwLWZlOTItNDVlMC1iZWFiLTQ2OTg0OTczZTlzMiIsImMiOiJF9>
- <sup>32</sup> American Library Association. Library Bill of Rights: Article 7. <https://www.ala.org/advocacy/intfreedom/librarybill>
- <sup>33</sup> American Library Association. Privacy: <https://www.ala.org/advocacy/privacy>
- <sup>34</sup> Public Library Association. Project Outcome: <https://www.ala.org/pla/data/performance measurement>.
- <sup>35</sup> Public Library Association. PLA Surveys and Data: <https://www.ala.org/pla/data/plasurveys>
- <sup>36</sup> Association of College and Research Libraries. Outcome Measurement Made Easy for Academic Libraries: <https://acrl.projectoutcome.org>
- <sup>37</sup> Public Library Association. Digital Learn. <https://www.digitallearn.org/>
- <sup>38</sup> Public Library Association. Project Outcome: <https://www.ala.org/pla/data/performance measurement>.
- <sup>39</sup> Association of College and Research Libraries. Outcome Measurement Made Easy for Academic Libraries: <https://acrl.projectoutcome.org>
- <sup>40</sup> P2PU. Explore Learning Circles: <https://www.p2pu.org/en/learning-circles/>
- <sup>41</sup> Nashville 2018 Community Needs Evaluation. <https://www.nashville.gov/departments/social-services/strategic-planning-and-research/publications/community-needs>
- <sup>42</sup> This example was originally published by the Urban Libraries Council. 2021. <https://www.urbanlibraries.org/innovations/telehealth-for-older-adults>
- <sup>43</sup> ITHAKA S+R. "Providing Library Services for Higher Education in Prison: An Interview with Jessica Licklider and Jeannie Colson. <https://sr.ithaka.org/blog/providing-library-services-for-higher-education-in-prison/>
- <sup>44</sup> School Library Journal. Brooklyn Public Library. <https://www.slj.com/story/a-model-of-library-service-to-children-of-incarcerated-parents-slj-talks-to-nick-higgins-brooklyn-public-library>; Seattle Public Library <https://www.seattlepi.com/seattlenews/article/Incarcerated-parents-can-read-books-to-their-kids-14432501.php>
- <sup>45</sup> 2021 Public Library Staff and Diversity Summary. Table 20. [https://www.ala.org/pla/sites/ala.org/pla/files/content/data/PLA\\_Staff\\_Survey\\_Report\\_2022.pdf](https://www.ala.org/pla/sites/ala.org/pla/files/content/data/PLA_Staff_Survey_Report_2022.pdf)
- <sup>46</sup> This example was originally published by the Urban Libraries Council. 2023. <https://www.urbanlibraries.org/innovations/digital-equity-for-spanish-speakers>
- <sup>47</sup> American Association of School Librarians. <https://standards.aasl.org/framework/>
- <sup>48</sup> American Libraries. Public Library Association. <https://americanlibrariesmagazine.org/blogs/the-scoop/pla-iii-teens-experience-librarianship-firsthand/>

<sup>49</sup> "High Impact Practices" are teaching and learning practices that have been widely tested and have been shown to be beneficial for college students from many backgrounds. They have benefit for all students, particularly those from groups traditionally underserved by higher education and those students are the least likely to have access to these high-impact practices. "High-Impact Educational Practices: What They Are, Who Has Access to Them, and Why They Matter," by George D. Kuh (AAC&U, 2008).

<sup>50</sup> "Employing Student Success: A Comprehensive Examination of On-Campus Student Employment." NASPA report February 2019, by Alexa Wesley, Alexis Wesaw, Omari Burnside, and Dr. Amelia Parnell.

<https://www.naspa.org/report/employing-student-success-a-comprehensive-examination-of-on-campus-student-employment>.

<sup>51</sup> "Building a Bridge: A Library Outreach Program for Students in Transition." ACRL 2023 Conference Proceedings. Xan Arch and Heidi Senior.

<https://www.ala.org/acrl/sites/ala.org.acrl/files/content/conferences/confsandpreconfs/2023/BuildingaBridge.pdf>

<sup>52</sup> Association of College and Research Libraries. <https://crln.acrl.org/index.php/crlnews/article/view/25127/32983>

<sup>53</sup> Association of College and Research Libraries.

[https://www.ala.org/acrl/sites/ala.org.acrl/files/content/conferences/confsandpreconfs/2013/papers/FawleyKryszak\\_Serving.pdf](https://www.ala.org/acrl/sites/ala.org.acrl/files/content/conferences/confsandpreconfs/2013/papers/FawleyKryszak_Serving.pdf)

<sup>54</sup> "Engaging Student Veterans as Researchers: Libraries Initiating Campus Collaborations," by Mark Lenker and Melissa Bowles-Terry. <https://commons.emich.edu/cgi/viewcontent.cgi?article=1004&context=loexconf2019>

<sup>55</sup> ULC YOUmedia: <https://www.urbanlibraries.org/innovations/youmedia>

<sup>56</sup> Public Library Association. 2020 Public Library Technology Survey.

<https://www.ala.org/pla/sites/ala.org.pla/files/content/data/PLA-2020-Technology-Survey-Summary-Report.pdf>

<sup>57</sup> School Library Systems Association. New York Library System Association Information Fluency Continuum.

<https://slsa-nys.libguides.com/ifc>

<sup>58</sup> Stanford History Education Group. Civic Online Reasoning. <https://www.ala.org/aasl/awards/best>

<sup>59</sup> Framework for Information Literacy for Higher Education. Association of College and Research Libraries/American Library Association (2015), <https://www.ala.org/acrl/standards/ilframework>

<sup>60</sup> Framework for Information Literacy for Higher Education. Association of College and Research Libraries/American Library Association (2015), <https://www.ala.org/acrl/standards/ilframework>

<sup>61</sup> Community of Online Research Assignments. <https://www.projectcora.org/assignments>

<sup>62</sup> Peer-Reviewed Instructional Materials Online Database. <http://primodb.org/php/browse.php/>

<sup>63</sup> Framework for Information Literacy for Higher Education Association of College and Research Libraries/American Library Association (2016), <https://www.ala.org/acrl/standards/ilframework>