ALAAmericanLibraryAssociation

Leverage Libraries to Achieve Historic Progress Towards Digital Equity for All

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U.S. Department of Commerce
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INTRODUCTION

The IIJA is a once-in-a-generation opportunity to make major inroads towards digital equity for all. The American Library Association (ALA), which represents the nation's 117,000 libraries of all types—including school, public, community college, college & 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.

America's libraries are instrumental to achieving the goals articulated in the Digital Equity Act and IIJA. Libraries have long been a cornerstone for equitable access to information and broadband-enabled services. Libraries support individuals as they apply digital tools and services to achieve important goals for themselves, their communities, and the nation. Libraries have been supporting and advancing digital literacy in the communities they serve for decades by providing technology access and informal and formal training, as well as coordinating and connecting with other trusted entities at the local and state levels.

Thankfully, the U.S. National Telecommunications and Information Administration (NTIA) also is not new to this vital work. The ALA appreciates the expertise NTIA brings from past initiatives like the Broadband Technology Opportunities Program (BTOP) and the BroadbandUSA activities and support that continued after BTOP concluded. These programs successfully increased broadband access and adoption, including through libraries across the US. These investments also 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 also believe there is a need to 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.

As long-standing community institutions that serve people of all backgrounds and circumstances, libraries are uniquely positioned to understand the services and support that are needed in their particular communities. With 117,000 libraries in the nation, there are libraries of every conceivable size, focus, and demographic composition. These include:

- community college libraries, which often support not only digital equity but also career readiness and small business development, especially for covered populations;
- college and research libraries that serve students in a covered population such as veterans, first-time college students in a family, and people with disabilities;
- public libraries serving communities of all sizes, from small towns to large cities;
- tribal libraries support digital equity, career readiness and small business development, preserve and promotes the cultural heritage;
- K-12 school libraries serving the curricular, learning and information needs of students; and
- every other kind of library, especially state libraries, public law libraries, and more.

Libraries, which are among the most highly trusted community institutions, are cost effective vehicles for federal broadband investments under the IIJA. Libraries:

- have a physical facility within the community;
- have expert staff who are experienced in providing digital and information literacy training and coaching;
- have community-relevant information resources, supporting workforce development and economic advancement and many other community needs;
- provide access and support for social services and telehealth, and
- advance digital equity and inclusion by ensuring library users have access to reliable, high speed internet access and online information resources both within library walls and increasingly, out in communities.

Over many decades, library staff have identified and implemented creative and innovative solutions to advance digital equity, literacy and inclusion, workforce development, and telehealth. For example, libraries of all types including school, public, community colleges, colleges and universities, and tribal libraries are:

- Bringing the internet to their residents. One example is the Orange County Public Libraries (CA). Through the WiFi on Wheels programs, the library brings no-fee internet connectivity to low broadband neighborhoods throughout the county and library staff are available to answer questions and provide digital skills support. Bethlehem Public Library (NY) provides Wi-Fi access 7 days a week 24 hours a day in multiple public areas around their community.
- Building digital skills. Watauga County Public Library (NC) provides digital skills coaching for parents and caregivers of K-12 students. Johnson County Public Library (IN) provides Digital Navigators that assists residents find low cost internet service, access computer training, borrow devices, navigate online social services and offers technical support.
- Providing workforce development support. For instance, the Eastern Illinois University Booth Library is offering a series of workshops to bring resources to the local workforce including how to create a resume, how to complete an online application, how to interview and more.

- Building information literacy skills. The [Naugatuck Valley Community College](#) (CT), 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 skills needed to be successful when entering college.
- Providing access and support of social services and telehealth in their communities. The [Jeff Davis County Library](#) (TX) is soundproofing conference rooms and providing needed equipment and technical assistance so residents in this rural community can have confidential telehealth sessions. In addition the library partnered with a social services agency, to offer a private space, computer, internet connection, and technical assistance for a counseling service for veterans and their spouses.
- Lend computers, tablets and/or hotspots to users who do not have one. Examples include the [Tohono](#) O'odham Venito Garcia Library (AZ), [Tulsa Community College Library](#) (OK) and San Jose Public Library (CA) just to name a few who lend laptops and hotspots to their users to complete homework, attend classes, search for jobs and so much more.
- Serve 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. This is just one example illustrating how state library agencies have strong connections to all their public libraries.

The library examples above highlight just some of the thousands of ways libraries are advancing digital equity, connectivity, literacy and inclusion, workforce development and telehealth in their communities. These programs highlight how libraries use their deep connections in their communities to use existing practice and innovative new ideas that can be cultivated through grants from the IIJA.

These examples highlight how libraries have a proven track record over many decades advancing these activities. And some of these activities, such as workforce development and connecting to social services, long pre-date the online environment.

Considering this successful history, libraries are a very cost-effective way to invest IIJA broadband funds because doing so leverages existing resources, expertise, and experience. Funding programs in libraries has a high likelihood for success today and will be sustained well into the future.

NOTE ON THE STRUCTURE OF RESPONSES

ALA anticipates that different members of the NTIA team will be reviewing the responses to various questions. Therefore, we repeated recommendations as applicable to ensure a consistent understanding of library roles and needs related to digital equity. That is, the response to each

question primarily stands on its own and does not depend on the assumption that the reader is reading this response as a narrative.

General Questions

BRINGING RELIABLE, AFFORDABLE, HIGH-SPEED BROADBAND TO ALL AMERICANS

1. What are the most important steps NTIA can take to ensure that the Bipartisan Infrastructure Law's broadband programs meet their goals with respect to access, adoption, affordability, digital equity, and digital inclusion?

First and foremost, NTIA should leverage and encourage coordination across existing assets to the greatest degree possible, including our nation's libraries (and other community anchor institutions) to maximize reach and sustainability for improving equitable access, adoption, and use of digital technology and services for all.

States should prioritize projects that support and advance digital literacy and inclusion like training, digital skills coaching, telehealth, workforce development etc. over hardware-focused projects for DEA awards. There are multiple programs that will fund hardware focused-projects but fewer opportunities in which digital literacy and inclusion support is funded.
Ensure the Participation of Small and Less-Affluent Libraries and Community Anchors. These organizations have a great need but do not have the resources required to complete individual applications and manage reporting in terms of the time, capacity and expertise. By contrast, these organizations are often in the areas that need help the most. Therefore, ALA recommends:
  ● streamlined applications and management over the life cycle of the grant for small/less-affluent libraries and other community anchors;
  ● creation of a simple form and streamlined follow-up processes for lower dollar requests so small and less-affluent libraries other community anchors can apply;
  ● encouraging or preferencing proposals from groups of smaller or less-affluent libraries and other community anchors (i.e., aggregation of applicants at the outset);
  ● robust outreach and support, including NTIA technical assistance, from the application process through grant completion; and
  ● encouraging cooperative agreements with regional library cooperatives, state library agencies, associations, or other entities to administer funds to small/less-affluent libraries.

Encourage waiving the matching provision, with no prejudice in evaluating applications, for high poverty libraries/service areas to ensure that high-poverty unserved and underserved communities can fully participate in these grant programs. Requiring matching funds will disincentivize smaller organizations, that are deeply connected within their community, from applying.

The ALA also endorses comments submitted by Schools, Health & Libraries Broadband (SHLB) Coalition, of which it is a founding member, including:

- Anchor institutions should be eligible to receive service from BEAD funding recipients if serving them will promote access by unserved and underserved homes.
- BEAD program recipients should have open access/interconnection obligations (middle mile applicants, too, but this should be evident).
- The NTIA and States should be allowed to refer to state and local broadband maps to supplement FCC maps.
- NTIA should require states to establish a plan to ensure timely and cost-efficient access for poles and rights of way needed for broadband deployment prior to receiving funding.
- NTIA should clarify that research and education networks are eligible for both BEAD and Middle Mile funding.
- Recipients of funding for last mile service should provide an affordable rate for minimum 25/3 broadband to the home.
- If an existing provider is only offering 25/3 Mbps service, a new provider offering 100/20 Mbps service or more should not be considered "overbuilding".
- NTIA should maximize transparency while minimizing administrative burden for all concerned wherever possible.
- State Digital Equity Plans should include the input from libraries, schools and other anchor institutions, should include data-driven analyses of measures to improve broadband adoption, and should recognize that anchor institutions should be eligible to receive funding to deploy community networks.

2. Obtaining stakeholder input is critical to the success of this effort. How best can NTIA ensure that all voices and perspectives are heard and brought to bear on questions relating to the Bipartisan Infrastructure Law's broadband programs? Are there steps NTIA can and should take beyond those described above?

Transparency. The creation of the State's Digital Equity Plan and 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:

- All individuals who are serving in some capacity to create 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 the plan.
- Meeting minutes posted publicly in a timely manner.
- Data, reports and other information gathered to inform the process.
- Once the plan is drafted, there should be an open comment period where residents and organizations can submit comments. This plan is for the community and they should be given the opportunity to respond to the plan that could affect them for years to come. All 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.

Leverage State Libraries' Connection in the Community. As a state agency, State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new broadband funding opportunities. As

such, they must be considered essential participants in the planning grant phase, as well as during grant implementation.

Leverage State Libraries' Role in State Government. The state library is well-placed as a central or connecting agency that complements domain-specific agencies such as employment, schools, or health. In addition to its connections to the libraries in the state, the state library is also a valuable contributor and collaborator across state agencies, and can provide insights and identify potential partnerships that will aid the state in creating and executing the state's plan.

Encourage the Inclusion of Libraries and Community Anchors in Applications.
Community Anchors that work in these areas (i) economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C) must be included in the design, planning and implementation of the state's digital equity, literacy and inclusion work. The NTIA must incentivize the inclusion of libraries and community anchors in the application process. One way in which to achieve community anchor's inclusion is to ensure they are included in the design and planning of the State Digital Equity Plan. In addition, during the grant application review, the evaluation criteria should include additional points awarded when an organization partners with a community anchor.

Libraries regularly engage in efforts to connect their communities through local partnerships. Non-library entities benefit from local expertise, experience and connections libraries provide as they work to attain their digital equity goals.

Formal Review of State's Plans. The State's equity plan should include a formal review process State's undertake yearly to ensure their digital equity plan goals are being met through the IIJA or other funding sources. As part of the review process, States should:
- determine if new goals need to be added after the plan is approved to address changes in the state's digital equity, literacy and inclusion needs and/or address new information uncovered after the plan was developed;
- incorporate lessons learned from earlier grant projects to grants awarded later in the grant cycle e.g. years 3-5; and
- assess the plan's goal and prioritize funding in later years to address needs that went unmet in earlier funding cycles.

Ongoing Outreach and Engagement. The NTIA Listening Sessions have provided an important opportunity for wide engagement and sharing. NTIA should consider how it might continue these or similar forums that may gather feedback on specific topics and/or from specific stakeholder groups and directly affected individuals. NTIA and states should consider outreach to and collaboration with intermediary organizations such as state libraries, ALA, and similar organizations, to engage and extend their reach to specific communities.

3. Transparency and public accountability are critical to the success of the Bipartisan Infrastructure Law's broadband programs. What types of data should NTIA require funding recipients to collect and maintain to facilitate assessment of the Bipartisan Infrastructure Law programs' impact, evaluate targets, promote accountability, and/or coordinate with other federal Start and state programs? Are there existing data collection processes or templates that could be used as a model? How should this information be reported and analyzed, and what standards, if any, should NTIA, grant recipients, and/or sub-grantees apply in determining whether funds are being used lawfully and effectively?

Reporting Requirements. 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. Further, libraries (and other institutions) must protect the privacy and confidentiality of user data. In fact, forty-eight states have statutes which require libraries to protect patron privacy.

We also 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 follow State library privacy statutes related to safeguarding sensitive 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.

We also ask that the NTIA think about 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 to be compliant with ECF auditing practices. This means that an FCC auditor in 2030 could request personal information about an individual who participated in the ECF program in 2021.

We also ask 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.

Open Data. NTIA should make aggregate information publicly available as rapidly as possible (quarterly or semi-annually, if possible, annually if not), to aid digital equity advocates, policymakers, and members of the press in understanding the impact of the law in real time. NTIA can do this by creating an online repository of state reports or a data dashboard showing key indicators. Designing a standardized reporting format will make it easier for states to report and easier for stakeholders to interpret data.

For instance, to aid organizations in comparing costs, provide publicly available data sets publishing information the NTIA, other governmental agencies, organizations and individuals can use to compare costs and services. Dataset should include:
- Connection Service Installed Requested (ex. cable modem, DSL, Leased Lit Fiber, other fiber, Mobile Broadband, Satellite, etc.)
- Building type (single family, multifamily, etc.)

- Type of CAI
- Cost of internet service per site
- Connection speed (upload/download)
- Data cap/throttling
- Community type: rural, semi-rural, suburban, urban, etc.
- Location information

To compare costs for frequently used hardware publish:
- Product type (laptop, modem/router combined, routers, tablets, hotspots, etc.)
- Cost per item
- Number of Items purchased

4. NTIA has an interest in ensuring that the Bipartisan Infrastructure Law is implemented in a way that promotes the efficient use of federal funds. How should NTIA and grant recipients verify that funding is used in a way that complements other federal and state broadband programs?

Streamline the Procurement Process. One way to promote efficiency without sacrificing accountability is to leverage established government processes. In order to streamline the procurement process we ask that NTIA waive the competitive bidding process if the applicant can procure materials and services through an already established local, regional or state contract and the services were attained using the applicant's established procurement processes.

Simplify Reporting Guidelines. While we understand the need the NTIA has to verify that funding is used in a way that complements other federal and state broadband programs, we also ask 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.

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SUPPORTING STATES, TERRITORIES, AND SUB-GRANTEES TO ACHIEVE THE GOAL

5. In implementing the Bipartisan Infrastructure Law's programs, NTIA will offer technical assistance to states, localities, prospective sub-grantees, and other interested parties. What kinds of technical assistance would be most valuable? How might technical assistance evolve over the duration of the grant program implementation?

Training and Outreach. The NTIA and its designees should provide webinars, instructions, FAQs, etc., to assist organizations in understanding the program rules and orders, guidance about compliance and filings, stakeholder support, and more. This support is crucial to assist organizations that may not be well versed in how to apply for funding of this type but are deeply rooted in the community and provide vital services to promote digital equity in their community. Webinars should include time for the audience to participate in a live question and answer system with members of the administrative team. NTIA and States should consider outreach to and collaboration with intermediary organizations such as state libraries, ALA, and similar organizations, to engage and reach specific types of organizations who work directly in these areas of focus: (i) economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C) These state and national organizations already have relationships and strong ties to state and local entities serving covered populations in key focus areas. NTIA should leverage this existing infrastructure in these respective fields.

Technical Assistance to Sub-grantees. NTIA's technical assistance should be broadly available not just to direct recipients of NTIA funds, but also to sub-grantees and community stakeholders who are engaged in some aspect of digital equity work. To ensure widespread awareness of technical assistance opportunities, NTIA should share announcements via proven modes of dissemination, through partners such as state workforce boards, state adult education agencies, state libraries, etc.

Central Access to Data. One way to provide technical assistance that evolves over the duration of the grant program implementation is to create a process and support systems for gathering and sharing data publicly.
- NTIA should establish a clearinghouse on its website with links to available public datasets and other useful data resources relevant to states' digital equity planning

processes, including the Census Bureau's American Community Survey and the Internet and Computer Use Survey data.

- NTIA also can explicitly identify the data sources to be used in establishing need within the planning template. NTIA can guide states in concisely documenting need and not spending copious time and resources on more studying of need.
- The clearinghouse should be regularly updated to include policy guidance, template documents, case studies of promising practices, and research/studies that can inform and improve states' digital equity work. While some applicants will have access to data analysts, medium and smaller organizations, like libraries and other community anchor institutions, will need support, instruction and tools to assist them in analyzing the data.
- NTIA's technical assistance should help 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 skill needs and training opportunities. NTIA should model cross-agency collaboration by holding joint informational webinars and/or issuing joint policy guidance with these and other federal agencies as appropriate.
- Provide a repository to store or link to non-governmental data that will assist in understanding needs, creating interventions and assessing program impacts.

Ensure Participation of Small and Less-Affluent Libraries. Small and less-affluent libraries have a great need for affordable, high-speed broadband and support to expand digital literacy offerings but many do not have the resources available to complete individual applications and manage grant reporting in terms of the time, capacity and expertise. By contrast, these libraries are often in the areas that need help the most. Therefore, ALA recommends:

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

Policy Research and Analysis. Include experts from libraries and library and information science schools in the evaluation of the impact and efficacy of the activities supported by grants awarded under these programs. The research and analysis should be accessible on a publicly available site so that states can incorporate the lessons learned over the duration of the grant program.

Broadband Mapping. States need access to accurate broadband mapping data to determine where to invest resources in areas that have limited or no access to broadband due to geographic and socio-economic factors. There is concern that existing mapping data does not create an accurate or comprehensive picture and is not as granular as needed by certain communities to create a plan that accurately addresses the lack of broadband availability in certain areas. When

mapping data provides conflicting information there needs to be an easy and timely process for challenging and resolving data mapping issues. The burden of proof should be on the incumbent provider to show that service is available in the challenged location. In addition, some states have detailed broadband maps that are updated on a regular basis. NTIA should accept such maps if they are updated in a more timely fashion than the FCC maps.

Broadly Share Lessons and Best Practices. 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.

6. The Bipartisan Infrastructure Law requires states and territories to competitively select subgrantees to deploy broadband, carry out digital equity programs, and accomplish other tasks. How should NTIA assess a particular state or territory's subgrant award process? What criteria, if any, should NTIA apply to evaluate such processes? What process steps, if any, should NTIA require (e.g., Request for Proposal)? Are there specific types of competitive subgrant processes that should be presumed eligible (e.g., publicly released requests for proposals and reverse auctions)?

Ensure Participation of Small and Less-Affluent Libraries. States should be required to engage community anchors of all sizes to ensure they contribute toward achieving the state digital equity goals. Applying for grants of this type is difficult for smaller organizations like libraries and community-based non-profits. As states build their plans including their programmatic requirements, it must include mechanisms ensuring equitable access and participation of public and non-profit organizations regardless of size: Issues to address include:
- streamlined applications and management over the life cycle of the grant for small/less-affluent libraries;
- creation of a simple form and streamlined follow-up processes for lower dollar requests so small and less-affluent libraries apply;
- encouraging or preferencing proposals from groups of smaller or less-affluent libraries (i.e. aggregation of applicants at the outset);
- robust outreach and support, from the application process through grant completion; and
- encouraging cooperative agreements with national or other entities to administer funds to small/less-affluent libraries.

Include Community Anchors in Broadband Deployment Plans. As part of the evaluation process, incentivize applicants who apply for funding to increase broadband service in a particular area to include partnerships with community anchor institutions who can promote the service with unserved and underserved populations. In addition, community anchor institutions can provide digital skills training and support, advance equitable access to education, healthcare and government services, and build information technology capacity to enable full participation in the digital economy.

Leverage State Libraries Connection in the Community. As state agencies, state Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new funding opportunities. As such, they should be considered essential participants in the planning grant phase, as well as during implementation.

Leverage Intermediary Organizations in the Granting Process. Consider partnering with intermediary organizations and organizations with a regional or national perspective – like the American Library Association – to ensure that small organizations are able to benefit from new funding opportunities.

Waive Matching Provision for High Poverty and/or Rural Service Areas. Encourage waiving the matching provision, with no prejudice in evaluating applications, for high poverty and/or rural libraries/service areas to ensure that high-poverty and/or rural unserved and underserved communities fully participate in these grant programs. The level of match should not be an evaluation factor--i.e., if match requirement is 10%, applicants should not receive extra points for a 30% match. Also waive the matching provision for applications that are under a specific amount.

Competitive Grant Process. A certain percentage of the State's subgrants should be awarded on a competitive basis allowing for community anchor institutions, businesses, and other organizations the ability to apply for funds to help address the broadband connectivity problems in the communities they serve. This will allow organizations that are locally connected but not known beyond their community connections the opportunity to advance the goals of the program. This also could include allowing for consortia of smaller organizations to apply jointly for subgrants or awarding additional points in an RFP selection process to organizations that can demonstrate a record of success in serving a covered population. The process should be transparent and calls for proposals for all funding opportunities related to this work should have to be centrally posted. It should be easy for community anchor institutions to find and respond to calls for proposals. Calls for proposals can be posted on multiple platforms but there should be one central platform statewide where organizations check.

7. NTIA views the participation of a variety of provider types as important to achieving the overall goals of the Bipartisan Infrastructure Law broadband programs. How can NTIA ensure that all potential subrecipients, including small and medium providers, cooperatives, non-profits, municipalities, electric utilities, and larger for-profit companies alike have meaningful and robust opportunities to partner and compete for funding under the programs?

In general: don't reinvent things. Leverage existing processes such as established grant-making and procurement procedures at the state level.

Leverage State Libraries Connection in the Community. State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new funding opportunities. As such, they should be considered essential participants in the planning grant phase, as well as during implementation.

Include Community Anchors in Broadband Deployment Plans. As part of the evaluation process, incentivise applicants who apply for funding to increase broadband service in a particular area to include partnerships with community anchor institutions who can promote the service with unserved and underserved populations. In addition, community anchor institutions can provide digital skills training and support, advance equitable access to education, healthcare and government services, and build information technology capacity to enable full participation in the digital economy.

Competitive Grant Process. A certain percentage of the State's funding should be awarded on a competitive basis allowing for community anchor institutions, businesses, and other organizations the ability to apply for funds to solve problems in the communities they serve. This will allow organizations that are locally connected but not known beyond their community connections the opportunity to advance the goals of the program in their community. The process should be transparent and calls for proposals for all funding opportunities related to this work should have to be centrally posted. It should be easy for community anchor institutions to find and respond to calls for proposals. Calls for proposals can be posted on multiple platforms but there should be one central platform statewide where organizations check.

Thinking Long-term. We must deploy network infrastructure that will support projected growth for at least thirty years. Investing in "future-proof" networks that support symmetric, multi-gigabit connectivity will cost much less in the long run than short-lived, incremental solutions that will require ongoing capital subsidies to ensure long term profitability.

8. States and regions across the country face a variety of barriers to achieving the goal of universal, affordable, reliable, high-speed broadband and broadband needs, which vary from place to place. These challenges range from economic and financial circumstances to unique geographic conditions, topologies, or other challenges that will impact the likelihood of success of this program. In implementing the Bipartisan Infrastructure Law's broadband programs, how can NTIA best address such circumstances?

Encourage Competition. "Competition is crucial for promoting consumer welfare and spurring innovation and investment in broadband access networks. Competition provides consumers the benefits of choice, better service, and lower prices." [directly quoted from Benton article] As new service is added, providers should not be given exclusive rights in a community. This exclusivity is counter to the goals of this program and will not give citizens choice, low prices or better service.

Broadband service made possible by IIJA funding should require providers to publicly publish their price for the service plan bid, broadband speed, and any associated fees.
States should identify ways in which permitting for broadband installations can be expedited so projects are not held up for years waiting for approval.

Leverage Infrastructure Projects. As states develop their plans they should explore how they, at both the state and local level, can leverage other infrastructure work to expand the reach and expedite the time needed for installation. For instance when new roads are constructed or other

public works projects that require trenching are being developed include the installation of conduit that can be used to expand or enhance broadband builds in the future.

Waive Matching Provision for High Poverty Service Areas. Encourage waiving the matching provision, with no prejudice in evaluating applications, for high poverty libraries/service areas to ensure that high-poverty unserved and underserved communities fully participate in these grant programs.

Streamline Procurement Process. Waive the competitive bidding process if the entity procures materials and services through an established local, regional or state contract and the services were attained using established procurement processes.

One Size Does Not Fit All. Rather than be overly prescriptive, NTIA should favor future-focused principles wherever possible to address diverse community circumstances. Often fiber will be the best solution, but in a few places it may not be practical and so some kind of satellite or wireless deployment will be needed.

9. Several Bipartisan Infrastructure Law broadband programs provide that, absent a waiver, a grant or subgrant recipient must contribute its own funding, or funding obtained from a non-federal source, to "match" funding provided by the BIL program. Under what circumstances, if any, should NTIA agree to waive these matching fund requirements, and what criteria should it assess (in accordance with any criteria established by the statute) when considering waiver requests?

Waive the Matching Provision for High Poverty and/or Rural Service Areas When Proposal Includes Community Anchors. Encourage waiving the matching provision, with no prejudice in evaluating applications, for high poverty and/or rural libraries/service areas to ensure that high-poverty and/or rural unserved and underserved communities fully participate in these grant programs. The level of match should not be an evaluation factor--i.e., if match requirement is 10%, applicants should not receive extra points for a 30% match. Also waive the matching provision for applications that are under a specific amount.

Broadband Equity, Access and Deployment (BEAD) Program

ENSURING PUBLICLY FUNDED BROADBAND NETWORKS THAT SUSTAIN AND SCALE

The American Library Association endorses the comments submitted by Schools, Health & Libraries Broadband (SHLB) Coalition.
1. Thinking Long-Term. We must deploy network infrastructure that will support projected growth for at least thirty years. Investing in "future-proof" networks that support symmetric, multi-gigabit connectivity will cost much less in the long run than short-lived, incremental solutions that will require ongoing capital subsidies to ensure long term profitability.

2. Anchor institutions should be eligible to receive service from BEAD recipients if serving them will promote access by unserved and underserved homes. Anchor institutions can play an enormously important role in promoting broadband access, adoption, affordability, digital equity and digital inclusion. There are hundreds of examples of anchor institutions and municipalities contracting with broadband companies to extend affordable broadband service – both wired and wireless - to their communities. Anchor institutions, especially libraries, also provide digital literacy training and promote awareness of broadband subsidy programs such as the Emergency Broadband Benefit/Affordable Connectivity Program.
3. Recipients of both BEAD program funding and Middle Mile funding should have open access/interconnection obligations, except in areas where only the bidder offers to provide service.
4. NTIA and States incorporate state and local broadband maps and other data to supplement the FCC maps.
5. NTIA should require funding recipients to establish a plan to ensure timely and cost-efficient access for poles and rights of way needed for broadband deployment prior to receiving funding.
6. NTIA should clarify that BEAD funding can be used for cybersecurity.
7. NTIA should clarify that BEAD funding can be used for backhaul/middle mile. The lack of backhaul/Middle Mile capacity is a serious problem for many communities. Building last mile connections to homes is worthless if there is no backhaul available to connect the community to an internet point of presence.
8. NTIA should clarify that research and education networks are eligible for both BEAD and Middle Mile funding.
9. Recipients of funding for last mile service should provide an affordable rate for minimum 100/20 level of broadband to the home.
10. Transparency is important and interconnection agreements should be made publicly available.
11. If an existing provider is only offering 25/3 Mbps service, a new provider offering 100/20 Mbps service or more should not be considered "overbuilding".
12. NTIA Should Establish Robust Specifications for broadband infrastructure for Funded Networks.
13. NTIA Should Also Establish Performance Testing Requirements of Funded Networks. We recommend that the NTIA establish explicit performance requirements for networks funded under the BEAD program. Latency, as an example, can be measured in terms of responsiveness within an ISP's own network, which offers little value in predicting the usability of the network for end-to-end performance across the Internet. Yet no ISP can guarantee latency across the networks of multiple ISPs.
14. State Digital Equity Plans should include the input from libraries, schools and other anchor institutions, should include data-driven analyses of measures to improve broadband adoption, and should recognize that anchor institutions can help serve unserved and underserved homes by contracting with private sector companies to extend low-cost wireless service to the home.

ESTABLISHING STRONG PARTNERSHIPS BETWEEN STATE, LOCAL, AND TRIBAL GOVERNMENTS

19. Community engagement is critical to eliminating barriers to broadband access and adoption. NTIA views strong involvement between states and local communities as key to ensuring that the broadband needs of all unserved and underserved locations are accounted for in state plans submitted for funding. What requirements should NTIA establish for states/territories to ensure that local perspectives are critical factors in the design of state plans?

Encourage the Inclusion of Libraries and other Community Anchors. One way to ensure the broadband needs of all unserved and underserved locations are addressed is to encourage all applicants to include libraries and other community anchors in the design, planning and implementation to achieve their communities' digital equity goals. Libraries regularly engage in efforts to connect their communities through local partnerships. Non-library entities would benefit from the local expertise, experience and connections libraries provide as they work to attain their digital equity goals. Additional points could be awarded in the grant proposal evaluation process.

Leverage State Libraries Connection in the Community. As a State agency, State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new funding opportunities. As such, they should be included as part of the state-level broadband team. State Libraries can also engage with local libraries to better understand their communities' broadband goals to inform state planning.

Include K-12 School Libraries. Through the State Education Agency, leverage libraries within K-12 schools. School libraries have much to offer in advancing digital equity and should not be overlooked.

Transparency. Community engagement is critical to eliminating barriers to access and adoption. To ensure that there is strong community involvement the creation of the State's Digital Equity Plan and 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:
- All individuals who are serving in some capacity to create 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 the plan.
- Meeting minutes posted publicly in a timely manner.
- Data, reports and other information gathered to inform the process.
- Once the plan is drafted, there should be an open comment period where citizens and organizations can submit comments. This plan is for the community and they should be given the opportunity to respond to the plan that could affect them for years to come. All 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.

20. When formulating state broadband plans, what state agencies or stakeholder groups should be considered in the development of those plans?

Leverage State Libraries Connection in the Community. As state agencies, State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new funding opportunities. As such, they should be included as part of the state-level broadband team. State Libraries can also engage with local libraries to better understand their communities broadband goals to inform state planning.

Include K-12 School Libraries. Through the State Education Agency, leverage libraries within K-12 schools. School libraries have much to offer in advancing digital equity and should not be overlooked.

Encourage the Inclusion of Libraries and Community Anchors in Applications. Community Anchors that work in these areas: (i) economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C) must be included in the design, planning and implementation of the State's Digital Equity plan. The NTIA must incentivize the inclusion of libraries and community anchors in the applications in general. One way in which to achieve community anchor's inclusion in designing, planning and implementation is to include evaluation criteria that includes additional points awarded in the grant proposal evaluation process.

Libraries regularly engage in efforts to connect their communities through local partnerships. Non-library entities benefit from local expertise, experience and connections libraries provide as they work to attain their digital equity goals.

21. How can NTIA ensure that states/territories consult with Tribal governments about how best to meet Tribal members' needs when providing funding for broadband service to unserved and underserved locations on Tribal lands within state boundaries?

NTIA should require states and territories to require consultation with tribal governments.

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LOW-COST BROADBAND SERVICE OPTION AND OTHER WAYS TO ADDRESS AFFORDABILITY

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22. The Bipartisan Infrastructure Law requires that BEAD funding recipients offer at least one low-cost broadband option and directs NTIA to determine which subscribers are eligible for that low-cost option. BIL § 60102(h)(5)(A). How should NTIA define the term "eligible subscriber?" In other words, what factors should qualify an individual or household for a low-cost broadband option?

The NTIA should look toward the FCC's Affordable Connectivity Program and the Lifeline Program for Low-Income Consumers as models to determine which subscribers are eligible for the low-cost option.

24. Affordability is a key objective of the Bipartisan Infrastructure Law's broadband programs. What factors should be considered in the deployment of BEAD funds to help drive affordability beyond the low-cost option?

Competition. Competition is crucial for promoting consumer welfare and spurring innovation and investment in broadband access networks. Competition provides consumers the benefits of choice, better service, and lower prices. As new service is added, providers should not be given exclusive rights in a community. This exclusivity is counter to the goals of this program and will not give citizens choice, low prices, or better service.

Cost comparisons. Provide publicly available data sets publishing information the NTIA, other governmental agencies, organizations and individuals can use to compare costs and services. Dataset should include:
- Connection Service Installed Requested (ex. cable modem, DSL, Leased Lit Fiber, other fiber, Mobile Broadband, Satellite, etc.)
- Building type (single family, multifamily, etc.)
- Type of CAI
- Cost of internet service per site
- Connection speed (upload/download)
- Data cap/throttling
- Community type: rural, semi-rural, suburban, urban, etc.
- Location information
-

Implementation of the Digital Equity Act of 2021

STATE DIGITAL EQUITY PLANS

25. The Bipartisan Infrastructure Law includes historic investments in digital inclusion and digital equity, promising to bring all Americans the benefits of connectivity irrespective of age, income, race or ethnicity, sex, gender, disability status, veteran status, or any other characteristic. NTIA seeks to ensure that states use Digital Equity Planning Grants to their best effect. What are the best practices NTIA should require of states in building Digital Equity Plans? What are the most effective digital equity and adoption interventions states should include in their digital equity plans and what evidence of outcomes exists for those solutions?

Work under the Digital Equity Act rightly begins with statewide strategic planning for digital equity. The DEA planning template should clearly state the role of that administering entity is to bring identified stakeholders to the planning process. In every state, there are public systems that represent providers and constituents that DEA is intended to serve. These systems can bring not only expertise in covered populations but also examples of current digital equity initiatives that

can be invested in and scaled through DEA. NTIA's guidance should mandate the inclusion of public systems serving covered populations through community anchor institutions in the core DEA planning leadership, including state library agencies.

As a state agency, State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new broadband funding opportunities. As such, they must be considered essential participants in the planning grant phase, as well as during grant implementation. The state library is well-placed as a central or connecting agency that complements domain-specific agencies such as employment, schools, or health.

Over many decades, libraries, through their staff, have identified and implemented creative and innovative solutions to advance digital equity, literacy and inclusion, workforce development and telehealth, which we detail further below. Libraries, which are among the most highly trusted community institutions, are cost effective vehicles for federal investments under the Digital Equity Act and should be included in state planning and implementation.

Digital Literacy. Building digital skills is a vital aspect of digital equity and one that has historically received scant federal attention or funding, particularly relative to broadband investments. Access to the internet and devices is not sufficient for digital equity. Digital literacy and skill development works best with instruction to help learners' use technology to accomplish their goals and is not tied to a specific tool; therefore, Digital Equity Plans should focus on the explicit development of digital literacy and skills rather than rely only on the purchase of tools and software. 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 as needed skills that will continue to evolve with new digital applications and services.

Libraries are uniquely equipped to address these needs across ages and backgrounds. For instance, at the Spokane (WA) Public Library community technology staff provide no-fee virtual tech support appointments to answer patron technology questions. Meanwhile, the Atlanta University Center (GA) Robert W. Woodruff Library offers technology and digital skills training to students at 4 historically black colleges and universities (HBCUs) to support their educational pursuits and build skills for future career opportunities. The Carroll County (MD) Public Schools libraries, in turn, provide a variety of digital literacy skills programs for K-12 students including teaching students how to code. The New Jersey State Library along with 12 public libraries is launching the Access Navigators Program which provides a cohort of skilled trainers (Navigators) to 12 participating libraries. The Navigators rotate through each participating library, to provide individualized assistance to persons seeking employment, job training, or digital competence. The program will also provide training in computer-based applications; assistance with resumes and job searching; electronic learning aids and resources to teach and enhance digital literacy skills as well as assist. entrepreneurs seeking to launch their new businesses.

According to the 2020 Public Library Association's Technology Survey:
  ● More than 88.3% of all public libraries offer formal or informal digital literacy programming.

- 84.7% offer informal digital literacy training, while 42.0% offer formal training.
- Many libraries lack the technology infrastructure to fully support or expand the digital literacy, equity and inclusion work:
  - Only one-third (36.7%) of public libraries have dedicated digital literacy and technology programs and training staff.
  - More than one-third (34.6%) of public libraries are unable to improve bandwidth because faster speeds are not available.
  - Rural libraries are much less likely to be able to offer digital literacy training or to have staff to support it.
- More than one in five libraries provide classes or informal help related to coding, computer programming, robotics, and 3D printing.

There are a range of modes for building digital literacy, from one-on-one to classes, both in-person and remote. Different populations may need different support at different times in their learning journey. And it is often human resource-intensive, particularly to reach and support people starting with the fewest digital skills. NTIA should allow for flexible solutions and invest in existing systems of digital equity services, such as libraries and adult education providers, and leverage strategies existing providers already have in place. Trusted entities exist and should be prioritized in state plans.

Digital Equity and Inclusion. Libraries also actively support digital equity and inclusion by offering no-fee internet access and by increasingly providing access to underserved or unserved residents beyond the library walls. Libraries understand how important it is that people have persistent access to affordable, reliable, high-speed broadband and devices and thus many are implementing programs to help connect households in their communities.

The Boonslick (MO) Regional Library bookmobile, for example, visits vulnerable populations in unserved and underserved rural areas to provide no-fee Wi-Fi access (and other library resources) to residents. The Bollinger County Library (MO) provides free Wi-Fi access 7 days a week 24 hours a day in 10 public areas in rural areas of the county. Libraries of all types— including public, community college, college and university and school libraries—lend laptops and hotspots to users who do not have access at home. The library at Contra Costa (CA) Community College District, a Hispanic Serving Institution, serving predominantly Latinx, African American and Asian students, lends hundreds of laptops and hotspots to students so they can fully participate in the education experience.

Libraries also take steps to ensure that their communities have access to high quality infrastructure. In one example, six tribal libraries and two schools in north-central New Mexico aggregated their broadband demand and built two sixty-mile fiber-optic networks to provide high-speed, scalable broadband access at significantly lower costs than commercial alternatives.

Libraries nationwide have implemented a variety of solutions to connect their communities. These examples illustrate just some of the ways libraries work with their community to assess their digital equity and inclusion needs and identify ways in which to connect their community now and continue to support their needs in the future. NTIA should recognize the role libraries

play in connecting their community to the internet and support the way in which libraries customize their solutions for unique community needs.

Workforce and Small Business Development. Libraries are also a critical community institution supporting workforce and economic advancement. Libraries provide digital technology (high-speed internet, computers, specialty software, etc.) and traditional resources (books and databases, training, work spaces, 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. The ALA is currently working with 13 libraries representing rural, tribal, urban, and suburban communities to develop a model to assist low-income and/or underrepresented entrepreneurs. One of those libraries is the Yakama Nation (WA) Library. This library currently 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.

Libraries are also creating programs that aid a specific 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.

Finally, 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.

There are a range of models that libraries of all types are implementing to support workforce and economic advancement. Different populations may need different support at different times in their career whether it is job searching support, starting a new business, or attending a virtual interview. Libraries provide a variety of personal and technical support to individuals in their

career paths. NTIA should allow for flexible solutions and invest in existing systems and encourage and support organizations in building a stronger workforce for their community.

Health. Libraries are increasingly providing access and support of social services and telehealth in their communities. For instance, the Pottsboro Area Library in Texas created a private room with high speed internet, computer, and camera so the people in this rural community without access to broadband could attend their telehealth visits. The Charleston County Public Library (SC) is participating in the WISE Telehealth Program, which was created to improve women's health and well-being by providing preventative care through telehealth at local libraries in the rural areas.

As telemedicine expands, libraries will be a place the community turns to for support. Whether it is a private room with needed technology, access to high speed internet access, or computer coaching, NTIA should allow for flexible solutions as libraries and health providers leverage existing strategies providers have in place and explore new interventions. Residents should not lack access to needed medical care because they lack the digital skills, technology and/or the broadband connection required to connect with their medical provider online.

Libraries are Creative and Responsive. As long-standing community institutions that serve people of all backgrounds and circumstances, libraries are uniquely positioned to understand the services and support that are needed in their particular communities. Over many decades, libraries, through their staff, have identified and implemented creative and innovative solutions to advance digital equity, literacy and inclusion, workforce development and telehealth. ALA urges NTIA to capitalize on libraries' close ties to the community and support creative approaches to advancing the goals of the Act. The library examples above provide just a few of thousands in practice, in addition to new ideas that could be cultivated through grants from the Digital Equity Act.

Digital Literacy Frameworks. Libraries have a proven track record over many decades, in advancing digital equity, literacy and inclusion. As such, they have models and frameworks they use to accomplish these goals.

The Association of Colleges and Research Libraries has a framework for Information Literacy for Higher Education. Released in 2015, community colleges, colleges and university libraries use this framework with faculty to connect information literacy with student success and learning.

The American Library Association in collaboration with library leaders, researchers and data scientists, developed Project Outcome, which is a free tool used by public and academic libraries to measure patron outcomes, including relative to digital learning.

The *AASL Standards Integrated Framework,* from the American Association of School Librarians, 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 prepare students for college and workforce readiness, information and digital literacy, integration of technology into learning, etc.

The National Digital Inclusion Alliance's [Digital Navigator](#) model is used by many community organizations, including libraries, to train skilled staff to address the whole digital inclusion process including home connectivity, devices, and digital skills — with community members through repeated interactions. The Digital Navigator model is a replicable framework for organizations already providing digital inclusion services or those entering the digital inclusion space to ensure that their constituents can connect with them online.

The [Connected Learning](#) model is used by many school and public libraries to engage teens in learning. The model combines connecting a teens personal interest with supportive relationships and opportunities to explore and engage with their interests in the real world. Libraries and other community anchor institutions that support teens use this model to explore their interest while building advanced digital skills.

Programs like the ones outlined above support libraries, and other community anchor institutions, in promoting meaningful adoption and use of broadband services across target populations in their community. Libraries have the tools, expertise and experience to advance the digital equity goals of the communities they serve and therefore should be included in the planning, design and implementation of their State's Digital Equity Plan.

26. Some states and territories will benefit from technical assistance in preparing Digital Equity Plans. What types of technical assistance, support, data, or programmatic requirements should NTIA provide to states and territories to produce State Digital Equity Plans that fully address gaps in broadband adoption, promote digital skills, advance equitable access to education, healthcare and government services, and build information technology capacity to enable full participation in the economy for covered populations? What steps, if any, should NTIA take to monitor and assess these practices?

Central Access to Data
- NTIA should establish a clearinghouse on its website with links to available public datasets and other useful data resources relevant to states' digital equity planning processes, including the Census Bureau's American Community Survey and the Internet and Computer Use Survey data.
- NTIA also can explicitly identify the data sources to be used in establishing need within the planning template. NTIA can guide states in concisely documenting need and not spending copious time and resources on more studying of need.
- The clearinghouse should be regularly updated to include policy guidance, template documents, case studies of promising practices, and research/studies that can inform and improve states' digital equity work. While some applicants will have access to data analysts, medium and smaller organizations, like libraries and other community anchor institutions, will need support, instruction and tools to assist them in analyzing the data.
- Provide a repository to store or link to non-governmental data that will assist in understanding needs, creating interventions and assessing program impacts.

Training and Outreach. The NTIA and its designees should provide webinars, instructions, FAQ's, etc. to assist states and other organizations in understanding the program rules and orders, give guidance about compliance and filings, and provide stakeholder support, and more. This outreach is crucial to assist organizations that may not be well versed in how to apply for funding of this type but are deeply rooted in the community and provide vital services to create digital equity in their community. Webinars should include time for the audience to participate in a live question and answer system with members of the administrative team. NTIA and States should consider partnering with intermediary organizations such as state libraries, ALA, and similar organizations, to engage and reach specific communities. These organizations already have relations and strong ties and can extend NTIA's reach.

Broadband Mapping. States need access to accurate broadband mapping data to determine where to invest resources in areas that have limited or no access to broadband due to geographic and socio-economic factors. There is concern that existing mapping data does not create an accurate or comprehensive picture and is not as granular as needed by certain communities to create a plan that accurately addresses the lack of broadband availability in certain areas. When mapping data provides conflicting information there needs to be an easy and timely process for challenging and resolving data mapping issues. The burden of proof should be on the incumbent provider to show that service is available in the challenged location. In addition, some states have detailed broadband maps that are updated on a regular basis. NTIA should accept such maps if they are updated in a more timely fashion than the FCC maps.

Simplify Reporting. We also ask 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. The best way that NTIA can support stakeholders is to lean into simplicity wherever possible.

27. Equity is also a named goal of the BEAD program described above. How should NTIA ensure that State Digital Equity Plans and the plans created by states and territories for the BEAD program are complementary, sequenced and integrated appropriately to address the goal of universal broadband access and adoption?

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 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 out 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 specifically note 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.

Formal Review of State's Plans. As part of the State's plan there should be a formal process that State's 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.

28. How should NTIA ensure that State Digital Equity Plans impact and interact with the State's goals, plans and outcomes related to: (i) economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C)?

Digital Equity Act planning and investment must be aligned to existing systems and services that work to support covered populations. State DEA planning template should ask states to detail existing successful strategies for continued investment, as well as envisioning new partnerships and new initiatives.

Formal Review of State's Plans. The State's equity plan should include a formal review process State's undertake yearly to ensure their digital equity plan goals are being met through the IIJA or other funding sources. As part of the review process, States should:
- determine if new goals need to be added after the plan is approved to address changes in the state's digital equity, literacy and inclusion needs and/or address new information uncovered after the plan was developed;
- incorporate lessons learned from earlier grant projects to grants awarded later in the grant cycle e.g. years 3-5; and
- assess the plan's goal and prioritize funding in later years to address needs that went unmet in earlier funding cycles.
- The reviews should be made public in a timeline manner.

NTIA should also consider inviting other federal stakeholders such as the Employment and Training Administration, Office of Career, Technical and Adult Education, or the Institute of Museum and Library Services to participate in plan reviews and approvals, to ensure coordination and alignment across systems.

Representation. Community Anchors that work in these areas e.g.: (i) economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations, should be included in the creation of the State's Digital Equity plan. As part of the NTIA review there should be metrics that require the inclusion of organizations that represent these groups in the planning process.

State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new funding opportunities. As such, they should be considered essential participants in the planning process.

Digital Equity Beyond the DEA. The $2.75B for DEA plan implementation should invest in systems and strategies that can slingshot digital equity efforts forward past the 4 years of DEA formula investment into the future. This means not opening separate 'public computer centers' or standing up new offices just to see them close, but truly investing in digital equity through established networks and partners. However, those established systems should be incentivized to create the most diverse set of partners and practices possible.

Transparency. The creation of the State's Digital Equity Plan must be transparent. Each state should be required to host a website documenting the processIt should include:
- All members who are serving in some capacity to create 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 the plan.
- Meeting minutes posted publicly in a timely manner.
- Data, reports and other information gathered to inform the process.
- Once the plan is drafted there should be an open comment period where citizens and organizations can submit comments. This plan is for the community and they should be given the opportunity to respond to the plan that could affect them for years to come. All comments should be made publicly available.

29. The Bipartisan Infrastructure Law directs states and territories to include in their digital equity plans "measurable objectives for documenting and promoting: (i) the availability of, and affordability of access to, fixed and wireless broadband technology; (ii) the online accessibility and inclusivity of public resources and services; (iii) digital literacy; (iv) awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and (v) the availability and affordability of consumer devices and technical support for those devices." What best practices, if any, should states follow in developing such objectives? What steps, if any, should NTIA take to promote or require adoption of these best practices? What additional guidance and oversight about the content of the State Digital Equity Plans should NTIA provide?

ALA appreciates NTIA's specific call out for each of these areas of focus and need to advance digital equity for all. States also should take such an inclusive approach to addressing each of these and considering interdependencies, as well as different stakeholder strengths to address various areas, in their plans. For NTIA, 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.
We provide more specific responses below.

Measurable Objectives, Privacy and Security. While we understand and appreciate the need to gather data to measure the attainment of programmatic goals for oversight, accountability and to document the impact of the federal investments, we ask that you not overburden stakeholders

with intrusive and burdensome requirements. Further, libraries (and other institutions) must protect the privacy and confidentiality of user data. In fact, forty-eight states have statutes which require libraries to protect patron privacy. Data collection should not become a barrier to participation in this vital work.

We also 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 follow State library privacy statutes related to safeguarding sensitive 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.

States should be strongly encouraged to balance the need for high-quality and meaningful data with the least burdensome and intrusive standard for data collection. This is consistent with the recent Presidential Executive Order (EO) 14058: *Transforming Federal Customer Experience and Service Delivery to Rebuild Trust in Government.* This EO emphasizes the urgent importance of reducing the "time tax" paid by members of the public to obtain publicly funded services.

For example, NTIA should heavily encourage the use of proxy measures (such as whether a person resides in a high-poverty zip code or receives SNAP benefits), rather than attempting to assess eligibility on a case-by-case basis (such as by asking digital literacy program participants to individually confirm their income eligibility).
This issue is especially urgent given the difficult circumstances faced by many of the Act's covered populations. People with very low incomes, those who are incarcerated or recently returned from incarceration, and people with limited English or literacy skills are disproportionately likely to lack government-issued identification. No data collection requirement should further burden already-marginalized groups with additional hoops to jump through before services can be obtained.

Include End User Support. Libraries every day see and support the need for end user support—States cannot assume "if you build it, they will come." Libraries have been supporting and advancing digital literacy in the communities they serve for decades in a variety of ways including:
- Most libraries provide no-fee tech support to answer patron technology questions, at point of need (when a patron asks a question relative to specific information need), by appointment (book a librarian), and through classes or open labs.
- Many libraries provide hands-on workshops to help patrons build digital skills on a variety of topics including but not limited to: how to search the internet, how to use a computer, how to use a specific software application, cyber security, digital citizenship, etc.
- Libraries provide access to online tools, like PLA's DigitalLearn, so patrons can build their digital skills at the point of need and at any time convenient to their schedule.
- Many libraries promote low or no cost internet services and connect patrons to low cost or free device options through the library or through other community organizations if available.

- Digital navigators and other dedicated staff and volunteers that include one or more of the above, alongside outreach and coordination with community-based organizations that provide direct service to specific demographics among covered populations.

Broadband Capacity to Support Households. Households need broadband that is able to support multiple users with the ability to send and receive data at volumes and speeds that support data-intensive activities such as voice communications, streaming audio and video, telemedicine, distance education, and telework at the same time. The need for broadband capacity to support multiple users uploading and downloading large, graphic rich content at the same time will only continue to grow. The *quality* of broadband access matters and should be recognized and included among specific objectives.

Build on Existing Measures. In recent years, some municipalities and states, as well other institutions like associations, nonprofits and colleges and universities, have already begun to identify measures and design measurement tools to assess progress toward digital equity objectives. NTIA should use its technical assistance resources to illuminate these emerging efforts and provide opportunities for peer learning among states as they develop, test, and iterate their approaches. The federal government's unique convening power and its ability to disseminate information and promising practices rapidly across the country are significant assets that NTIA should capitalize on, rather than attempting to completely centralize the process of defining objectives and measures.

Consider Multiple Data Sources. States should also be encouraged to adopt objectives that are *qualitative* as well as quantitative. Extensive research has shown that people care deeply about the kinds of life improvements and expanded opportunities that can be best measured through qualitative data – and this is just as true in the field of digital equity as any other.
Public libraries frequently measure both the *outputs* and *outcomes* of the training they offer. For example, they count the number of programs offered and the number of patrons who attended those programs (outputs). Many libraries also use tools like [Project Outcome](#) to capture patron learning (outcomes). Project Outcome's standardized surveys ask library patrons to report whether, as a result of participating in a library program or service, they learned something new, they intend to apply what they learned, they feel more confident in that area, and they are more aware of the library's resources. Digital Learning is one of the survey topics available in Project Outcome and it is used for library services for patrons to access technology, build technology-related skills and confidence, and make beneficial use of digital resources and services to meet patron needs. Examples include: Technology Usage Skills, Internet Education, or Computer Education services and programs. To date, US public libraries have collected more than 28,500 responses to this survey. This model for outcome measurement could be more widely adopted by libraries (and other organizations) to document immediate outcomes of digital literacy and digital skills training.

DIGITAL EQUITY COORDINATION REQUIREMENTS

30. The Bipartisan Infrastructure Law requires state and territories to consult with historically marginalized and disadvantaged groups, including individuals who live in low-income households, aging individuals, incarcerated individuals (other than individuals who

are incarcerated in a Federal correctional facility), veterans, individuals with disabilities, individuals with a language barrier (including individuals who are English learners and have low levels of literacy), individuals who are members of a racial or ethnic minority group, and individuals who primarily reside in a rural area. What steps should NTIA take to ensure that states consult with these groups as well as any other potential beneficiaries of digital inclusion and digital equity programs, when planning, developing, and implementing their State Digital Equity Plans? What steps, if any, should NTIA take to monitor and assess these practices?

NTIA should take all possible steps to ensure that states use their obligation to consult with historically marginalized populations as a meaningful tool to inform and shape their implementation of the Digital Equity Act, rather than a mere compliance requirement. To that end, NTIA should act on three fronts:

First, NTIA should provide specific and detailed *guidance* (via Notice of Funding Opportunity or policy memorandum) to states about the variety of approaches that can satisfy this requirement. This guidance should illustrate a broad array of options regarding *format* (listening sessions, informal consultations, surveys, etc.), *outreach strategies*, and *best practices* regarding eliciting and utilizing stakeholder feedback.

Second, States should be required to be transparent and publicly post information about the processes they are using to plan, develop, and implement the State's Digital Equity Plan. NTIA should require States to report on how they tackled the consultation challenge by including questions about it in the State Digital Equity Planning documents and NOFOs.

Finally, NTIA should *model* at the federal level the same process of using input from historically marginalized communities that is desired at the state level. NTIA should proactively seek out relevant existing literature written by people and organizations representing historically marginalized communities and should make every effort to institutionalize the lessons learned from these efforts as part of digital equity program design and implementation

Transparency. The creation of the State's Digital Equity Plan must be transparent. Each state should be required to host a website documenting the process. It should include:
- All members who are serving in some capacity to create 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 the plan.
- Meeting minutes posted publicly in a timely manner.
- Data, reports, and other information gathered to inform the process.
- Once the plan is drafted there should be an open comment period where citizens and organizations can submit comments.
- When the draft plan is put out for comment, the State should communicate its availability widely through all existing agencies, as well as enable submitted comments to be made publicly available. While this process may not ensure all marginalized and disadvantaged groups are included in the process, it will make it easier for both the NTIA and the State's citizens to know who was and was not included, which can lead to more accountability at

the State level. Publishing comments also helps to enable cross-pollination and sharing for ongoing learning.

Leverage State Libraries Connection in the Community. State Libraries have strong connections to every library in their state and a record of serving even small and rural libraries that otherwise may not benefit from new funding opportunities. As such, they should be considered essential participants in the planning grant phase, as well as during implementation.

Encourage Inclusion of Libraries and Community Anchors in Applications. Community Anchors that work with and/or represent covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C) must be included in the design, planning and implementation of the State's Digital Equity plan. The NTIA must incentivize the inclusion of libraries and community anchors in the applications in general. One way in which to achieve community anchor's inclusion designing, planning and implementation is to include evaluation criteria that includes additional points awarded in the grant proposal evaluation process.

Libraries regularly engage in efforts to connect their communities through local partnerships. Non-library entities benefit from the local expertise, experience and connections libraries provide as they work to attain their digital equity goals.

31. The Bipartisan Infrastructure Law also requires states and territories to coordinate with local governments and other political subdivisions in developing State Digital Equity Plans. What steps should states take to fulfill this mandate? How should NTIA assess whether a state has engaged in adequate coordination with its political subdivisions?

NTIA should encourage states to leverage organizations that have connections in the community. This includes State Libraries which have strong connections to every library in their state and a record of serving even small and rural libraries that are not always included in the planning process and therefore don't always benefit from new funding opportunities. As such, they should be considered essential participants in the planning grant phase, as well as during implementation. Also include K-12 school libraries. Through the State Education Agency, leverage libraries within K-12 schools. School libraries have much to offer in advancing digital equity and should not be overlooked.

In order to ensure that States connect with local governments and political subdivisions, they should use a *checklist* or similar tool to approach this process in a standardized way. In particular, state leaders should: 1) connect with multiple representatives of each local jurisdiction (ideally representing education, workforce, library and technology agencies); 2) ascertain whether there are existing local digital equity activities or plans that can inform the state plan; 3) seek input from local leaders about the state plan.

NTIA can support this process by developing such a checklist and by asking questions in its State Digital Equity Planning guidance to prompt states to follow it.
National government associations like the National League of Cities, the National Association of Counties, and similar—many with state and local bodies—also should be considered.

NTIA should also explore potential ways to track and publicize which local jurisdictions have already developed their own digital equity plans. For example, BAND-NC has been providing mini-grants to help North Carolina counties develop their own local digital inclusion plans. Capturing this kind of information and sharing it publicly via a clearinghouse website or similar landing page will be helpful to local and state leaders across the country.

IMPLEMENTATION OF MIDDLE MILE BROADBAND INFRASTRUCTURE (MMBI) GRANT PROGRAM

The American Library Association endorses the comments submitted by Schools, Health & Libraries Broadband (SHLB) Coalition.

OTHER COMMENTS

Conclusion
While ALA notes a second RFQ is planned to gather information related to Digital Equity Implementation and Competitive Grant programs, we offer preliminary comments now.

Digital Equity 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. As a complement to other IIJA investments, ALA recommends NTIA prioritize visionary and/or strategic investments, rather than incremental or short-term projects. ALA proposes these principles for investments:
- Emphasize services to people, whether educational/informal learning, economic, health, or otherwise, as contrasted with projects that focus on hardware or internet access directly, as there are recent new streams of funding (e.g., Emergency Connectivity Fund) as well as significant ongoing ones (e.g., E-rate program) for the latter.
- 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.
- Prioritize projects with a likelihood for success and ability to scale and develop knowledge and practices applicable for the field at large now and in the years to come.
- Include some projects that focus on developing the infrastructure and sustainability for digital equity work, rather than only on providing direct services. For example, there might be a project about developing strategic collaborations and support for digital equity programs that includes producing resources and training.
- Fund some research. This includes the analysis of the research and evaluation component 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.
- Over the term of this program lessons learned and best practices should evolve and change, as well. To ensure that States continue to engage with learnings from the Competitive program, we recommend activities to share successes in person, in articles and reports, and online.

That said, some investment is warranted in more immediate-focused projects, such as addressing unmet but highly meritorious needs identified through the State Digital Equity Capacity Grant Program, especially if such needs are best met at a regional or national level.

Libraries as Drivers to Advance Goals. America's 117,000 libraries – school, public, academic, and varied other types – are instrumental in achieving Infrastructure Investment and Jobs Act goals. For illustrative purposes, here are a few examples of how libraries advance some of the goals:

- Digital literacy
  - The New Jersey State Library launched the Access Navigators Program which provides a cohort of skilled trainers (Navigators) to 12 participating libraries. The Navigators rotate through each participating library, to provide individualized assistance to persons seeking employment, job training, or digital competence.
  - The Spokane (WA) Public Library community technology staff provide no-fee virtual tech support appointments to answer patron technology questions.
- Digital equity and inclusion
  - The Boonslick (MO) Regional Library bookmobile visits vulnerable populations in unserved and underserved rural areas to provide no-fee Wi-Fi access (and other library resources) to residents.
  - The Contra Costa (CA) Community College District library lends hundreds of laptops and hotspots to students so they can fully participate in the education experience.
- Education and learning
  - The Carroll County (MD) Public Schools libraries provide a variety of digital literacy skills programs for K-12 students including teaching students how to code.
  - Meanwhile, the Atlanta University Center (GA) Robert W. Woodruff Library offers technology and digital skills training to students at four historically black colleges and universities (HBCUs) to support their educational pursuits and build skills for future career opportunities.
- Economic development: Workforce and small business
  - The Yakama Nation (WA) Library provides internet access and reference support to low-income, Alaskan Native and American Indian populations to conduct their business research and also is developing an entrepreneurial makerspace.
  - The Grand Rapids Public Library (MI) has created a Small Business Resources Center to support people in creating, managing and growing their business. The library has dedicated space, technology, print and electronic resources, classes and more to support their citizens business needs.
- Health
  - The Charleston County Public Library (SC) is participating in the WISE Telehealth Program, which was created to improve women's health and well-being by providing preventative care through telehealth at local libraries in the rural area.

○ The Pottsboro Area Library (TX) created a private room with high speed internet, computer, and camera so the people in this rural community without access to broadband could attend their telehealth visits. Example

Libraries: A Strategic Advantage. Libraries, which are among the most highly trusted community institutions, are cost effective vehicles for federal investments. Libraries:
● already have a physical facility within the community and campuses;
● have expert staff who are experienced in providing digital and information literacy training and coaching;
● have community-relevant information resources, supporting workforce development and economic advancement and many other community needs; and
● provide access and support of social services and telehealth, and advance digital equity and inclusion by ensuring library users have access to reliable, high speed internet access and technology both within the library walls and increasingly, in the community.

Libraries have a proven track record over many decades, in advancing these activities. And some of these activities, such as workforce development and support of social services, long pre-date the online environment. Considering this successful history, putting programs in libraries is cost effective because it leverages existing resources, expertise and experience. Funding libraries has a high likelihood for success today and will be sustained in years to come.

Libraries are also part of a larger digital equity ecosystem, and often have long-established partnerships and relationships with local and regional groups that can be leveraged to achieve community broadband equity goals for their vulnerable populations.

Grant Administration and Specifics. ALA has identified some recommendations for the design of this grant program. Though developed through our library lens, these ideas are generalizable beyond libraries:
● Ensure the Participation of Small and Less-Affluent Libraries
○ Small and less-affluent libraries have a great need but do not have the resources needed to compile individual applications and manage reporting in terms of the time, capacity, and expertise. By contrast, these libraries are often in the areas that need help the most. Therefore, ALA recommends:
■ streamlined applications and management over the life cycle of the grant for small/less-affluent libraries;
■ creation of a simple form and streamlined follow-up processes for lower dollar requests so small and less-affluent libraries can apply;
■ encouraging or preferencing proposals from groups of smaller or less-affluent libraries (i.e., aggregation of applicants at the outset);
■ robust outreach and support, from the application process through grant completion; and
■ encouraging cooperative agreements with national or other entities to administer funds to small/less-affluent libraries.
● Waive the Matching Provision for High-Poverty Service Areas. We encourage waiving the 10% matching provision, with no prejudice in evaluating applications, for high-

poverty libraries/service areas to ensure that high-poverty unserved and underserved communities can fully participate in these grant programs.

- Streamline Procurement Process. Waive the competitive bidding process if the entity can procure materials and services through an established local, regional or state contract and the services were attained using established procurement processes.
- Support Indirect Costs. Eligible costs must include both relevant direct and indirect costs such as salaries including fringe benefits, hardware including maintenance and support, services, travel, materials, etc.—without prejudice in the evaluation of applications.
- Ensure the application process only requires information that pertains to the entity's funding request.
- Reporting Requirements
  - We understand and appreciate the need to gather data for oversight, accountability and to document the impact of the federal investments, but we ask that you balance that requirement with the need that libraries have to protect the privacy and confidentiality of their users. In fact, many state statutes require libraries to protect patron privacy.
  - We also ask that reporting guidelines be simple. Smaller or less-affluent libraries in particular lack staff resources to devote considerable time to any reporting requirements.
- Encourage the Inclusion of Libraries and Community Anchors Applications in General. Encourage all applicants to include libraries and other community anchors in the design, planning and implementation to achieve their communities' digital equity goals. Libraries regularly engage in efforts to connect their communities through local partnerships. Non-library entities would benefit from the local expertise, experience and connections libraries provide as they work to attain their digital equity goals. Additional points could be awarded in the grant proposal evaluation process.
- Policy Research and Analysis. We ask that experts from libraries and library and information science schools be included in the evaluation of the impact and efficacy of the activities supported by grants awarded under these programs.

Digital Equity Implementation Grant Program
ALA appreciates the emphasis on and explicit carve-out of guidance and funding for Planning separate from Implementation. Thorough, thoughtful, and inclusive plans create the best conditions for successful implementation. That said, it should be assumed there will be a degree of variation between planning and implementation to account for expertise and entities not included in planning, as well as learnings over time. Progress against the State plan and adjustments made to incorporate new information should be regularly shared, with NTIA explicitly encouraging such adjustments and even incentivizing innovation and scaling based on key learnings.

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On behalf of the American Library Association and the nation's 117,000 libraries