



Recommendations for Successful Digital Equity Programs

Federal, state, and local governments have allocated billions of dollars to promote digital equity and inclusion programs that aim to ensure that all people and communities have the access, technology, and skills to reap the full benefits of our digital society. This includes \$2.75 billion from the bipartisan infrastructure law and millions more from sources including the American Rescue Plan Act and state and local appropriations.

Communications Workers of America (CWA) members are experienced broadband technicians and customer service workers, as well as community leaders who believe in digital equity and high speed broadband for all. CWA's local leaders stand ready to support government agencies in crafting plans that are effective in closing the digital divide. In this document, we outline some of CWA's recommendations on how digital equity programs (DEPs) should be designed and implemented.¹

DIGITAL EQUITY PLANS SHOULD RESULT IN MEASURABLE IMPROVEMENTS TO THE QUALITY OF LIFE

Short and long-term evaluation of Digital Equity Plans should not just look at whether individuals in the target populations have basic access to broadband and connected devices but also evaluate whether this new access is resulting in measurable improvements to quality of life, including health, education, and employment opportunities.

DEPs should incorporate a scoring rubric that evaluates whether the needs of all target populations have been taken into account and whether the plan incorporates solutions to address barriers to broadband adoption and use. The scoring rubric should focus on equitable distribution while prioritizing the most affected, including those in urban areas who disproportionately lack broadband connections.²

Activities that could be included in DEPs are: digital skills and cyber security training, IT-related workforce development, subsidized broadband service and devices, community access points, educational programs on how to access subsidized services with a focus on unhoused individuals and other hard-to-reach low-income families living in very rural areas, group houses, or basement units. Individuals assisting the covered population (e.g. caretakers) should also be eligible to benefit from potential digital literacy services. The National Digital Inclusion Alliance promotes the Digital Navigators Model for local digital inclusion programs, which CWA supports when aligned with our principles for job quality, described below.³

¹ For a more comprehensive set of recommendations, *See* Comments of Communications Workers of America, Digital Equity Act of 2021, Request for Comments, NTIA Docket No. 230224-0051, RIN 0660-XC055 (May 1, 2023), <https://drive.google.com/file/d/1auRx9NP0D36eLMw5Di0RLg05SnHrZ5d-/view?usp=sharing>.

² Bipartisan Policy Center, "Understanding the Urban Digital Divide" (Mar. 5, 2021), <https://bipartisanpolicy.org/blog/urban-broadband-blog>.

³ NDIA, The Digital Navigator Model, <https://www.digitalinclusion.org/digital-navigator-model/>.

NEED FOR A COMPREHENSIVE CONSULTATION PROCESS

DEPs may not succeed if government agencies fail to thoroughly consult with all community stakeholders as part of the plan development. To do so, agencies should meet with representatives of target populations before working on any draft plans and continue to meet with the same populations to review the proposed drafts. Oral presentations and written summaries of the proposed digital equity plans should be published in primary languages that are spoken in the community and in an easy-to-understand format (e.g. larger fonts for older adults).

IMPORTANCE OF CONSULTATION WITH WORKERS AND LABOR UNIONS

It is crucial that DEP planning includes consulting with organized labor and local workforce investment boards as key stakeholders in the process. The labor movement has implemented many successful labor-management training partnerships over the years, some of which include digital skills training. These programs serve as models for advancing the goals of the BEAD and Digital Equity Programs.

DIGITAL EQUITY PROGRAMS SHOULD ADOPT WORKER-CENTERED PERFORMANCE STANDARDS

Digital equity programs may not be as effective if they do not contribute to the creation of high quality career jobs in the communities that they intend to serve. For digital equity investments tied to workforce training, CWA recommends DEPs incorporate the AFL-CIO's performance criteria into their short and long term evaluation of the programs.⁴ These include:

- Increase in living standards including wages and benefits (healthcare, childcare, paid leave, control of scheduling, retirement)
- Improved job security and employability including career pathways
- Participation and progress of underserved populations
- Opportunities for workers to exercise their right to form and join unions
- Improved labor-management relations, including support for digital skills and literacy training in collective bargaining agreements

CWA recommends that, for grant programs that will create new staff positions and organizational infrastructure, grantees be required to comply with fair labor practices, similar to the approach taken in the BEAD NOFO⁵ and the US Department of Transportation's RAISE grants NOFO.⁶ The role of "digital navigator," and similar positions, should be considered on par with other public service jobs and come with high quality training, good wages and benefits, the right to form a union, and other basic hallmarks of quality jobs.

⁴ Comments of American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), In the Matter of Infrastructure Investment and Jobs Act Implementation, Docket No. 220105-0002, at 6 (Feb. 4, 2022).

⁵ NTIA, Notice Of Funding Opportunity, Broadband Equity, Access, and Deployment Program, NTIA-BEAD-2022, at 56.

⁶ Department of Transportation, "Notice of Funding Opportunity for the Department of Transportation's National Infrastructure Investments", G4910-9X, <https://www.transportation.gov/sites/dot.gov/files/2022-01/FINAL%202022%20RAISE%20NOFO.pdf> [The DOT states that it "intends to use the RAISE program to support the creation of good-paying jobs with the free and fair choice to join a union and the incorporation of strong labor standards and training and placement programs."].