**Comment Template:**

**Broadband workforce development and digital skills**

***(State BEAD Action Plan or Initial Proposal)***

**Overview**

**What is this template and when should it be used?**
It is a short summary of broadband workforce development and digital skills recommendations to that advocates can use as a template. It is designed to help education and workforce advocates who want to ensure that their state’s implementation of federal [Broadband Equity, Access, and Deployment (BEAD)](https://internetforall.gov/program/broadband-equity-access-and-deployment-bead-program) funds responds to the needs of workers and small businesses on the ground. Specifically, this template can be used to:

* Submit *formal* comments on a State BEAD Action Plan or BEAD Initial Proposal (especially Volume II).
* Submit *informal* comments to a state broadband office or related state agency
* Comment on other state policy documents related to BEAD, such as draft Requests for Proposals for BEAD funds.

The recommendations cover ***why*** states should invest in broadband workforce development and digital skills as part of their federal BEAD spending, ***what*** program models and strategies they should focus on, and ***how*** they can measure the success of their efforts.

**How do I find out where to submit my comments and what the deadlines are?**

The federal government maintains a list of state BEAD agency contacts at [InternetforAll.gov](https://internetforall.gov/funding-recipients). Use the drop-down menu at that link to select the “Broadband Equity, Access, and Deployment” program and then select your state. Contact information for the state broadband office will appear below.

[Find out which plans are open for comment in your state](https://broadbandusa.ntia.doc.gov/public-notice-posting-state-and-territory-bead-and-digital-equity-plansproposals) using this federal site. Note: Even if some deadlines for commenting on BEAD Action Plans or Initial Proposals have passed, *we strongly encourage you to submit informal comments now* to ensure that state leaders hear how important these issues are to your community, and stay tuned for additional opportunities for formal comment in early 2024.

**How should this template be adapted?**

Fill in information for your state and organization in the yellow-highlighted sections. Feel free to edit, adapt, or delete other parts of the template as you see fit.

If your organization is the leader of an NSC SkillSPAN coalition or Business Leaders United affiliate, we encourage you to share this template with your coalition members and urge them to submit comments, as well as submitting your own.

**What if I have questions about using this template or where to submit comments?**

Contact National Skills Coalition SkillSPAN staff or Senior Fellow Amanda Bergson-Shilcock at amandabs@nationalskillscoalition.org.

**Comment template – Cover Letter**

Dear [NAME OF STATE OFFICIAL]:

[ORGANIZATION NAME] appreciates the opportunity to provide comments on how [STATE NAME] can invest in the workforce development programs and services needed to achieve its broadband deployment goals. We are a [SHORT SENTENCE DESCRIBING YOUR ORGANIZATION AND WHY YOU CARE ABOUT BROADBAND WORKFORCE DEVELOPMENT AND/OR DIGITAL SKILLS].

We recognize the critical importance of [STATE]’s efforts to ensure that affordable, accessible high-speed internet is available to and adopted by residents across our state. Getting to this goal will require a robust and skilled workforce that is well-prepared for broadband-related jobs.

As federal funding for various programs under the Infrastructure Investment and Jobs Act (IIJA) continues to roll out, Internet Service Providers and other eligible entitles in our state are facing stiff competition from employers in the energy, transportation, and other sectors for qualified workers. **This makes it imperative that we start *now* to ensure there are multiple on-ramps to workforce training and education in this field**, so that talented people from a variety of backgrounds can be ready to hit the ground running as our state needs them.

[STATE] can’t afford to gamble that broadband infrastructure employers and subcontractors can rapidly “staff up” at short notice, because there are simply *not enough people* in the existing pool of infrastructure workers to fill the slots needed given the volume of IIJA funding that is coming to states. Instead, we need to invest in flexible, resilient career pathways that allow people to be cross-trained for related occupations, protecting them from the vagaries of the labor market while ensuring that [STATE] has the skilled workforce we need.

Equally as important as making sure we have the workforce to build broadband infrastructure is **making sure that [STATE] residents are equipped with the technology skills they need** to make full use of their new high-speed internet access. Research from the Federal Reserve Bank of Atlanta and the National Skills Coalition recently found that [X% - find your state’s number on [page 24](https://nationalskillscoalition.org/wp-content/uploads/2023/02/NSC-DigitalDivide_report_Feb2023.pdf)] of Help Wanted ads in [STATE] call for workers with digital skills – across all industries and most occupations. Ensuring economic vitality in our state means making certain that [STATE RESIDENTS – e.g., Minnesotans] have the digital skills they need to qualify for today’s jobs.

Finally, other research has shown [a clear connection between increased digital skills and the likelihood of broadband adoption](https://www.benton.org/blog/half-acp-eligible-households-still-unaware-program). If [STATE] is to achieve its ambitious goals for high-speed internet adoption**, investing in the digital skills of [STATE RESIDENTS] is urgently necessary**.

Thank you again for the opportunity to submit these comments. **Questions about this submission can be directed to [STAFF MEMBER’S NAME, EMAIL, PHONE].**

Sincerely,

[STAFF MEMBER]

[JOB TITLE]

[ORGANIZATION]

**Comment template – Recommendations**

[Choose any of the below recommendations to include in your comments. As appropriate, adjust the language to praise your state for its planned activities or express concern if your state is not planning to pursue this recommendation at this time. To find out what your state has publicly announced, [visit this federal site](https://broadbandusa.ntia.doc.gov/public-notice-posting-state-and-territory-bead-and-digital-equity-plansproposals).]

* ***Dedicate a portion of BEAD last-mile deployment funds for workforce development.*** Federal guidelines have made clear1 that last-mile money can be used for: 1) training for cybersecurity professionals who will be working on BEAD-funded networks; and 2) workforce development – including via Registered Apprenticeships, pre-apprenticeships, and community college and/or vocational training -- for broadband-related occupations. [STATE] should capitalize on this important opportunity and set aside a portion of BEAD last-mile funding for workforce development efforts.
* ***Collaborate with fellow state agencies to gather information necessary to make wise use of workforce funds****.* Specifically,[STATE] broadband leaders should take advantage of existing resources such as: 1) our state Labor Market Information agency and State Workforce Development Board to help identify the demand for specific occupations; 2) our department of education and higher education coordinating board to understand credentials and training pathways associated with in-demand occupations; and 3) our labor and economic development agencies (in addition to business associations) to understand local employers’ specific needs.
* ***Establish clear criteria for what constitutes an effective workforce development program.*** Scoring criteria should reward applicants whose training programs reflect best practices in the field, such as contextualized learning, integrated education and training, portable industry-recognized credentials, earn-while-you-learn models, and connections to supportive services such as childcare that allow workers of all backgrounds to persist and succeed in workforce programs. A particularly useful model is [industry sector partnerships](https://nationalfund.org/best-practices/form-industry-partnerships/), which bring together multiple employers along with education and workforce partners to develop employer-informed training programs. These elements are essential to ensure that workers have realistic prospects of attaining local employment when they complete training, and that local businesses can find the skilled workforce they need to complete BEAD-funded projects.
* ***Consider a variety of different mechanisms to distribute funds.*** For example,[STATE] should consider whether a portion of BEAD funding should be distributed directly to other state agencies to quickly ramp up existing workforce and education programs; whether [STATE BROADBAND OFFICE] can play a “matchmaking” role in bringing together Eligible Entities with potential subcontractors who can handle the workforce training component of BEAD-funded projects; and if there is other technical assistance that [STATE] can offer to help BEAD-funded organizations launch and run effective workforce development programs. Regardless which of the above options is chosen, [STATE] should definitely follow federal guidance2 and **establish selection criteria for subgrantees** that prioritize applicants that make enforceable commitments to advancing equitable workforce development.
* ***Invest in partnerships that include trusted community-based organizations.*** The existing infrastructure workforce is more likely to be older, white, and male in comparison to younger workers who are now entering the labor market. If [STATE] is going to succeed in having enough broadband workers, it will be vital to create on-ramps into the broadband industry for new workers of all backgrounds – including people of color, formerly incarcerated individuals, women, and immigrants. Rather than trying to build new relationships from scratch, it will be a much more efficient use of BEAD resources for Eligible Entities to subcontract with longstanding community-based organizations that have earned the trust of community members and can provide a “warm handoff” to connect workers to job training programs (or in some cases, operate training programs themselves).
* ***If available, dedicate a portion of non-deployment funds******to support digital skills****.* While we recognize that [STATE] may or may not have BEAD funds remaining for non-deployment uses, if such funds are available we strongly urge that they be used to support digital skill-building.3 [STATE BROADBAND OFFICE] can use our State Digital Equity Plan as a starting roadmap for these investments. In particular, it is vital to ensure that non-deployment funds support both basic (foundational) digital skills as well as more advanced (industry- or topic-specific) digital skills. Skill-building programs should be available in geographically diverse regions of our state, and should be accessible to a wide range of community members, with few burdensome administrative requirements or eligibility criteria.4 Programs should help individuals build skills in the real-world context in which they will be used, and should result in measurable improvements in skill level. Programs should be encouraged to gather both quantitative and qualitative data to demonstrate the impact of BEAD funding.
* ***Establish clear evaluation criteria from the beginning of BEAD implementation***. We recommend that [STATE] contract with a professional program evaluator to design a simple, clear standard by which BEAD workforce development and digital skills investments can be assessed. Determining a handful of standardized measures from the beginning will save enormous amounts of time and resources later on, and will enable [STATE BROADBAND OFFICE] to see whether its investments are hitting the mark in producing the skilled broadband workforce and the digitally skilled state residents that we are all hoping to see. We recognize that the bulk of BEAD investment and data collection will focus on the important and worthy goals of measuring high-speed internet access, but it is crucial to actually measure whether workforce investments are paying off as anticipated, so that mid-course corrections can be made if necessary.