**Comment Template:**

**Digital skills programs and outcomes measures**

**Overview**

**What is this template and when should it be used?**It is a short summary of digital skills-related recommendations that education and workforce advocates can use as a template to:

* Submit formal comments on their State Digital Equity Plan
* Submit informal comments to their state broadband office or other state agency stakeholders
* Comment on draft state Requests for Proposals or Solicitations for Grant Applications for digital equity funds.

The recommendations cover ***why*** states should invest in digital skills as part of their federal Digital Equity Act spending, ***what*** program models and strategies they should focus on, and ***how*** they can measure the success of digital upskilling programs.

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

The nonprofit World Education maintains [a list of state agencies overseeing Digital Equity Act funds](https://docs.google.com/spreadsheets/d/1EkZiRvo96jbb2-ExyquM_u0aXEiHNUYbntdhGnoQ8js/edit#gid=0). Find your state and visit your state agency’s website to see which opportunities for comment are coming up. Even if the initial deadline for State Digital Equity Plan public comments has passed, you will have other opportunities to submit comments on related issues in early 2024 – and we strongly encourage you to submit informal comments in the meantime, to ensure that state leaders hear how important these issues are to your community.

**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, 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](mailto: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 and measure digital skills. We are a [SHORT SENTENCE DESCRIBING YOUR ORGANIZATION].

A major policy priority for our organization is creating and supporting inclusive digital skills policies so that people can access good jobs, and small businesses can hire for in-demand positions. As stakeholders in this important discussion, we welcome the chance to share our experience and observations with the [STATE AGENCY NAME].

Over and over again, **when people are asked why they want to learn digital skills, they answer:** ***To get a job***, or to get a better job. This reality is a cornerstone of the work that digital inclusion providers and advocates have been doing in [STATE] for more than 30 years, and the programs and services that adult education, community college, and workforce development organizations offer in every corner of our state.

The federal Digital Equity Act, passed as part of the Infrastructure Investment and Jobs Act in 2021, is a generational investment in meeting this demand. The funding that [STATE] is receiving through this legislation will not only help residents get badly needed access to high-speed internet and digital devices, but also equip them with the skills they need to ***use*** those tools effectively to achieve their economic and career aspirations. **Equipping people with the digital skills they need for the workplace and beyond is an integral part of achieving broader digital inclusion goals.**

Recent research from the nonprofit National Skills Coalition and the Federal Reserve Bank of Atlanta highlights the demand for digital skills in our state. The [***Closing the Digital Skill Divide***](https://nationalskillscoalition.org/resource/publications/closing-the-digital-skill-divide/) report analyzed millions of Help Wanted ads and found that fully [X% - find your state’s number on [page 24](https://nationalskillscoalition.org/wp-content/uploads/2023/02/NSC-DigitalDivide_report_Feb2023.pdf)] of jobs in [STATE] today require digital or likely digital skills. These numbers hold true across industries and for workers at every level of education and experience.

A crucial finding of this report is the ***overwhelming demand for frontline, entry-level workers to use technology on the job***.People need both the foundational, basic skills that are commonly covered in introductory classes, as well as more specialized skills relevant to their particular industry or occupation. Here are just a few examples:

* Robotics in the retail, logistics and warehousing, and meatpacking industries
* Scanner, point-of-sale, and other e-commerce technologies in the retail sector
* Safety technologies, blueprint technologies, and other mobile applications in the construction sector
* Industrial Internet of Things (IoT) devices and on-board tractor and harvester software and hardware systems in the agricultural sector
* Cybersecurity in the healthcare, local government, and utility industry sectors

As this research makes clear, today’s digital skills stretch far beyond the traditional image of a white-collar worker sitting at a desktop computer. ***The jobs in which Digital Equity Act “covered populations” are currently working – and the new jobs they aspire to – require digital skills.***

As [STATE] implements its federal investments, investing in digital skills will be a crucial element of serving the covered populations outlined in the law -- including rural residents, veterans, low-income individuals, people of color, and people with language or literacy barriers, among others.

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 continued:***

***Key considerations for investing in programs to build digital skills***

As [STATE] determines how it will invest the formula funding received via the Digital Equity Capacity Grants, it is important to prioritize investments in digital skills. By focusing on these proven models and strategies for teaching digital skills, [STATE AGENCY] can ensure wise use of resources:

* ***Contextualized and integrated program models*** that help individuals build digital skills in the contextof the real-world settings in which those skills will be used. For example, a healthcare program that prepares entry-level workers to use mobile apps for patient care and timekeeping, or a basic digital skills class that allows participants to become comfortable using technology to support their own and their children’s education, navigate job-application and payroll software, or access telehealth services.
* Programs offered by organizations that have ***earned the trust of community members*** over time and have established strong relationships with covered populations. Many nonprofit organizations, faith-based organizations, public libraries, and similar groups have a head start in helping individuals build digital skills because they are already known and trusted resources in our communities. [STATE] can more effectively meet its goals of building covered populations’ digital skills if it contracts with organizations that already have a demonstrated record of success in serving those populations.
* Programs that ***respond to local needs***, including the local labor market demand, educational opportunities, and individuals’ own aspirations for digital skill-building. While state-level information is important, local stakeholders play an important role in identifying and responding to residents’ needs. [STATE] should prioritize investments in digital skill-building programs that have a good feedback loop established for local input.
* Programs that result in ***high-quality, portable and stackable credentials*** that individuals can use across a wide variety of settings. While not every digital skills training program must result in a credential, those that *do* should be sure that they are providing relevant, in-demand credentials that will be genuinely useful to participants. As documented by the nonprofit Credential Engine, there are [tens of thousands of different types](https://credentialengine.org/2022/12/07/credential-confusion-new-report-identifies-more-than-one-million-credentials-offered-in-the-u-s-across-a-maze-of-nearly-60000-providers/) of certifications, certificates, badges, and other credentials in existence, including many that are focused on digital skills. It is impractical for [STATE AGENCY] to try to individually assess whether each of these credentials is valuable. Instead, it is preferable to establish guardrails for what constituents a [quality non-degree credential](https://nationalskillscoalition.org/wp-content/uploads/2023/07/The-NDCQ-Imperative-report_fnl2-1.pdf) and require program providers to meet those general guidelines.
* Programs that offer ***holistic support services*** to help digital skill-building participants persist and succeed. Barriers such as lack of childcare, transportation, digital devices, or broadband access can hinder individuals’ ability to succeed in training programs. Not every organization needs to offer every type of service, but digital skill-building programs should at a minimum have strong referral relationships with partners who can support other needs, both through direct financial assistance and program staff who can support navigation and connection to resources.

***(Comment template continued):***

***Key considerations for measuring digital skills***

1. ***Establish a simple, standardized set of measures that all digital skill-building programs will report on.***Having a set of common measures is crucial to providing [STATE AGENCY] and members of the public with easy-to-compare results over time, across different programs, and across local jurisdictions.
2. ***It is vital that these measures be associated with*** ***outcomes*** – that is, observable changes in ability or capacity – and not simply outputs or measures of activities carried out. Outcome measurement allows program providers and other stakeholders to gauge whether programs are actually helping people achieve intended goals. In particular, they can help state leaders identify potential bottlenecks (programs or geographic areas where participants are getting stuck or not flourishing) as well as springboards (programs or areas that are doing an especially good job of helping people advance).
3. ***Specifically, we recommend that these common measures include:***
   1. Number and percentage of individuals who have achieved a measurable digital skill gain, disaggregated by type of gain (foundational/basic, applied/industry-specific, or advanced digital skills) and covered population.
   2. Number and percentage of individuals who have attained a quality non-degree credential, disaggregated by covered population.
   3. Number and type of digital skills program slots established or expanded, disaggregated by type of training provider (nonprofit organization, higher education institution, worker center, etc.); type of training (foundational/basic, applied/industry-specific, or advanced digital skills); and geographic location (urban, suburban, rural).
4. ***Provide flexibility within the common measures****.* Specifically, [STATE] should provide multiple options for *how* programs can demonstrate that participants have made a measurable digital skills gain – including pre/post testing, credential attainment, employment promotion/advancement, and others. This will give providers vital flexibility in designing programs that are responsive to the real needs of people on the ground, without shoehorning all participants into a single type of assessment. Similarly, states should allow providers to report on any type of credential that meets quality guidelines, without “picking winners” by selecting just one credential that all providers must use.
5. ***We also recommend that [STATE AGENCY] collect additional qualitative data from a subset of programs.***This data can add richness and depth to the quantitative measures described above and can point the way to future improvements. Collecting this data in a limited fashion – perhaps by contracting with an evaluator to conduct interviews with a small percentage of programs – can be a cost-effective way to gather valuable information from:
   1. Program participants about what inspired them to enroll in digital skills training and how they have defined success for themselves;
   2. Program providers about how they define success in digital skill-building and what they have learned from trying to apply the required measures listed above;
   3. Employers about how they gauge digital skills among jobseekers and workers, and their experiences hiring individuals who have completed Digital Equity Act-funded training programs.
6. ***Collect basic demographic data without adding unnecessary burdens.*** [STATE] should strike a balance between collecting enough information that it is possible to track success in closing equity gaps for covered populations, without imposing on individuals’ privacy or unnecessarily burdening program providers with complex requirements. Data collection and reporting requirements should never be a stumbling block to improving equity for covered populations.

To that end, programs should be strongly encouraged to use 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 participants to individually confirm their income eligibility). This issue is especially urgent given the difficult circumstances faced by many 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 individuals with additional hoops to jump through before services can be obtained.**

Similarly, [STATE AGENCY] should follow best practices used in the public health and education fields and ensure that individuals born outside the United States are ***not***required to demonstrate a specific immigration status to participate in digital equity programs. This flexibility has already been adopted for the Affordable Connectivity Program by major Internet Service Provide