



CEOARE Comments to National Telecommunications and Information Administration on the Matter of Digital Equity Act of 2021

April 2023

NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
U.S. DEPARTMENT OF COMMERCE
Washington, D.C. 20230

In the Matter of

Digital Equity Act of 2021; Request for Comments
Docket No. 230224-0051 NTIA—2023—0002

CEO Action for Racial Equity (CEOARE) is pleased to submit its response to your notice and request for comment. We aim to provide input and recommendations for consideration to the National Telecommunications and Information Administration (NTIA) to bolster the agency's Notices of Funding Opportunity for the State Digital Equity Capacity Grant Program and the Digital Equity Competitive Grant Program.

The Bipartisan Infrastructure Law provides historic investments in closing the digital divide and we commend you for designing a process that aims to provide every person in the United States with equal access to high-quality, affordable broadband internet access service as a modality to directly address societal racial disparities and improve the lives of historically marginalized and disadvantaged groups.

CEOARE is a Fellowship composed of over 100 companies that mobilizes communities of business leaders with diverse expertise, across multiple industries and geographies, to advance public policy in four key areas — healthcare, education, economic empowerment, and public safety. Our mission is to identify, develop, and promote scalable and sustainable public policies and corporate engagement strategies that address systemic racism, social injustice, and improve societal well-being.

The CEOARE Fellowship has a policy portfolio focused on eight issues that disproportionately and systemically impact Black Americans, including Closing the Digital Divide. Our comments are grounded in a principles-based approach, which has relevance across several topics within this Request for Comment and which are of critical importance to Black Americans and communities of color, including:

- **Accessibility:** In urban and rural communities, access to a reliable broadband network will help enable full participation in society and strengthen the S. economy.
- **Affordability:** Even when broadband is available, it must be affordable for moderate to low-income Americans.
- **Adoption:** Barriers to technology adoption should be understood and addressed to help enable all to benefit from digital



- Data Mapping and Tracking: Accurate data mapping is necessary to understand the intersection between racial equity and the digital

With these principles in mind, we offer comments in response to two questions contained in the Request for Comment, as outlined below. Specifically, we aim to weigh-in on digital equity strategies, tactics, and success measures for Covered Populations in Question 21. Additionally, we aim to address potential strategies to enable that equity and workforce opportunities can be achieved under the BEAD Program in Question 24.

Question 21: Comments on Digital Equity Strategies, Tactics, and Success Measures for Covered Populations

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

We acknowledge the difficulty in setting a defined baseline and fundamental standards for digital literacy for all learners. We appreciate NTIA's understanding that there is not a one-size-fits-all approach to the spectrum of Covered Populations across the country. We share in NTIA's assessment that communities and Covered Populations' needs vary greatly. The digital divide in America is tightly woven with issues of race, education, and economic status, with affordability and access being a legacy problem that disproportionately affects Black Americans. Furthermore, Black Americans remain less likely than non-Hispanic white Americans to own a traditional computer or have high-speed internet at home.¹ Black Americans are ten years behind white peers in digital literacy and could be disqualified or underprepared for 86% of the jobs in the U.S. job market by 2045.² The gap extends further to 48% of Black youth, who are three times as likely as white youth to have no or limited independent digital skills.³

CEOARE recognizes that needs may change over time. For example, the COVID-19 pandemic highlighted more than ever how essential broadband is to American life, particularly education, jobs, health and medical care. What were once acceptable standards for digital literacy quickly became challenged, as many interactions for the purposes of education, work and job-seeking, and health services moved to the digital space. A baseline and fundamental standard that factors in the changing dynamics among Covered Populations, particularly individuals who are members of a racial or ethnic minority group, and workforce development needs to meet evolving employer skill demands, can lead to a healthy workforce and economy.

Accordingly, we recommend the periodic reconsideration of the baseline and fundamental standards that are established for Covered Populations as well as an

ongoing evaluation of how those standards are impacting Covered Populations using disaggregated racial data in such evaluations.

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

CEOARE applauds the objective of the Broadband, Equity, Access and Deployment Program (BEAD Program) to connect everyone in the United States with affordable, reliable, high-speed internet service. We are particularly appreciative of the BEAD Program's efforts to provide members of underrepresented communities and Covered Populations with meaningful representation in the workforce as part of this historic investment in broadband.

We recognize that the digital divide is a significant issue for Black Americans in both urban and rural areas. Approximately five million Black American households in urban areas are without access to broadband.⁴ In rural counties, broadband availability is almost 20 percent lower where a majority of residents are Black compared to rural counties that are predominately white.⁵ Overall, 36.4% of Black households (16M) do not have a computer or broadband access.⁶

At CEOARE, our policy agenda is dedicated to timely issues that are important to corporate America with a particular focus on driving impact to 47M+ Black Americans across the country. From the beginning, our work has centered around engaging with key stakeholders to help inform our policy and corporate engagement efforts. We have engaged in conversations with a variety of stakeholders from across the country from local nonprofit and community organizations, to national coalitions such as the National Digital Inclusion Alliance and the National Skills Coalition to discuss and ideate on the disparate impact the digital divide has on Black Americans.

One of the themes throughout these discussions is that trust is a large factor in the effective adoption of programs. Based on our learnings, we encourage NTIA to prioritize programs, projects, and collaborative relationships that have a demonstrated track record of success in serving underrepresented communities and Covered Populations. We believe that organizations with a history of work in this space have clear on-ramps to additional skill-building opportunities and uniquely understand the challenges and needs for the communities they serve. We share in NTIA's view that States and their subgrantees are entrusted liaisons on behalf of members of underrepresented communities and Covered Populations, which we hope in turn will yield higher rates of adoption. By investing directly in organizations that have established, longstanding commitments to their communities, we hope that NTIA can invest federal dollars in response to the equity goals established by Congress and that goals will be achieved in a timely fashion.



Based on conversations with our stakeholders, there are many ways BEAD and Digital Equity Programs can support and promote youth employment and skills building. Below are a few highlights and learnings from aligned stakeholders:

- Digital Skills Training Programs: BEAD and Digital Equity Programs should invest in community-based organizations, libraries, schools, and businesses to offer digital skills training programs. For example, leveraging existing programs with established track records of success in skilling youth from covered populations such as Girls Who Code or Black Girls CODE. These programs provide free coding and digital literacy classes to girls from underrepresented communities.
- Internship Programs: Internship programs provide youth with hands-on experience in the workforce, allowing them to apply the digital skills they have learned in real-world. Established programs that provide youth from Covered Populations with hands-on experience in software engineering, data analytics, or other technology-related fields are important organizations to advance digital skills.
- Mentoring Programs: Mentoring programs provide youth with guidance and support as they explore potential career. Existing organizations such as Big Brothers Big Sisters have an existing platform to create mentoring programs that connect young people with professionals to gain exposure to how digital skills are applied in the workplace.
- Industry Business Partnerships: The BEAD and Digital Equity Programs should support business partnerships and organizations in the internet and internet-related industries to provide youth with exposure to the latest technologies and trends in the field. Organizations like Code.org, Tech Bridge Girls and Black Girls CODE provide youth with access to coding resources and tools.

We believe that programs, projects or collaborative relationships, such as those mentioned above, have the ability to help advance digital skill building. We applaud the local organizations that lead the way in these areas. We encourage NTIA to prioritize and incentivize States and subgrantees that have a demonstrated history of effective experience working with Covered Populations, particularly individuals who are members of a racial or ethnic minority group.

We appreciate that the National Telecommunications and Information Association is looking for broad input and feedback from stakeholders to inform the agency's Notices of Funding Opportunity for each digital equity grant program. We hope our responses convey our enthusiastic interest in advancing racial equity priorities that seek to close the Digital Divide.

Respectfully submitted,
CEO Action for Racial Equity



Citations

¹ Sara Atske and Andrew Perrin, "[Home Broadband Adoption, Computer Ownership Vary by Race, Ethnicity in the U.S.](#)", Pew Research Center, Washington, D.C., July 16, 2021.

² Apjit Walia, "[America's Racial Gap & Big Tech's Closing Window](#)", Deutsche Bank Research, September 2, 2020.

³ Ian Hecker and Amanda Briggs, "[Overlooked and Underconnected: Exploring Disparities in Digital Skill Levels by Race among Older Youth in the US](#)", Urban Institute, January 2021, 4.

⁴ Bill Callahan and Angela Siefer, "[Limiting Broadband Investment to 'Rural Only' Discriminates Against Black Americans and Other Communities of Color](#)", National Digital Inclusion Alliance, June 2020.

⁵ G.K. Butterfield, "[Race and the Digital Divide: Why Broadband Access is More than an Urban vs. Rural Issue](#)", The Hill, May 13, 2019.

⁶ [The Digital Divide: Percentage of Households by Broadband Internet Subscription, Computer Type, Race and Hispanic Origin](#), United States Census Bureau, September 11, 2017.

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