

August 31, 2022

Alabama Department of Economic and Community Affairs  
Ms. Maureen Neighbors - Alabama Digital Expansion Division  
P.O. Box 5690  
Montgomery, AL 36103-5690

**RE: Input Regarding State Digital Plan**

Dear Ms. Neighbors,

As a group of national membership, policy, and advocacy organizations working to modernize state preschool through workforce data systems (“P–20W data systems”) to better serve data users (individuals, the public, and system leaders) in states, we are writing to urge you to make appropriate data collection, integration, and use a key element of your State Digital Equity Plan. The digital equity grants authorized by the bipartisan Infrastructure Investment and Jobs Act (IIJA) passed by Congress last year provide an unprecedented opportunity to identify and address persistent barriers to achieving universal access to high-speed broadband and connected devices. Removing digital access barriers, sustaining access improvements, investing in digital skill building, efficiently targeting investments, and measuring the impact of improved impacts, however, will require states to adopt or expand a set of effective data system use and integration strategies as part of these plans.

Providing every American with the high-speed connections, equipment, digital skills, financial resources, and other tools required to maximize the internet’s potential will yield incredible individual and social benefits. Achieving this vision of digital inclusion will not be possible, however, unless states and their partners have accurate data that enables them to: (1) identify where connectivity gaps exist; (2) measure progress toward closing connectivity gaps; and (3) evaluate the education, workforce, health, and other benefits derived from closing connectivity gaps. States should build upon current work to improve access and use of accurate and actionable data to accomplish these important objectives and to implement innovative integrated data system solutions that work for individuals, communities, and policymakers alike.

Making data part of your State Digital Equity Plan and prioritizing related investments in P–20W data systems is not just a best practice. Rather, the Digital Equity Act recognizes data’s central importance to improving broadband and technology connectivity rates and ensuring improved connections support broader state and community policy goals. For example, providing individuals the information they need to make decisions about their education and workforce journeys, understanding skills inequities, and helping states effectively target skill-building investments. In fact, the new law requires State Digital Equity Plans to use data to describe the current degree of digital inequities among target populations and measure how federal funds will close equity gaps in access, affordability, and skills for each covered population, ultimately improving people’s education, workforce, health, civic, and other outcomes. These activities will not only depend on the continued use and modernization of state P–20W data systems, but also

will require substantial efforts to integrate existing data systems and collections so that they work more cohesively moving forward. In this way, states can make use of existing data infrastructure to better understand their digital inclusion needs and address challenges where they are identified.

### State Plans Must Include Strategies for Measuring the Impact of Connectivity Improvements

The federal Digital Equity Act and its accompanying Notices of Funding Opportunity require states to think holistically about the digital equity goals they are trying to achieve, the objective measures that will allow them to gauge their success in achieving those goals, and how data can inform their efforts. In particular, the IJJA's Digital Equity Act requires State Digital Equity Plans to assess how broadband access and affordability, digital literacy, online accessibility, and inclusivity of public resources and services will impact and interact with: the (1) state's economic and workforce development goals, plans, and outcomes; (2) education outcomes; (3) health outcomes; (4) civic and social engagement; and (5) the delivery of other essential services. Integrated P–20W data systems—such as Kentucky's KY STATS, Maryland's Longitudinal Data System Center, South Carolina's open-source interoperable P–20W SLDS, Washington State's Education Research & Data Center, Indiana's Management Performance Hub, and Minnesota's Statewide Longitudinal Education Data System, as well as the Cradle-to-Career Data System in process in California—are essential tools for evaluating these resources' impact on the program's target individuals and communities.

Including within your State's Digital Equity Plan investments in and the planned use of linked P–20W data has the potential to reveal other benefits and impacts that may be derived from closing connectivity and skill gaps. For instance, recent research from the Federal Reserve Bank of Philadelphia found that prime-aged workers with access to broadband connections had substantially higher levels of employment than their non-connected peers.<sup>1</sup>

### Incorporating Data Collection, Integration, and Use into Your State Digital Equity Plan

State leaders responsible for writing Digital Equity Plans should consider the following steps to ensure appropriate inclusion and use of state data within their plans:

- **Invest in P–20W data system modernization.** As part of State Digital Equity Plans and aligned with the allowable uses of funds under the IJJA, state leaders should consider prioritizing investments in P–20W data systems to improve them and, to the greatest extent possible, make use of existing data infrastructure through related integration efforts. Doing so will further empower leaders and policymakers to answer critical questions regarding how their efforts to make digital inclusion and digital skill building more accessible and affordable are impacting education and workforce outcomes of individuals over time.

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<sup>1</sup> <https://www.philadelphiafed.org/-/media/frbp/assets/community-development/reports/broadband-subscription-computer-access-and-labor-market-attachment-across-us-metros.pdf>

- **Engage experts.** Consistent with the IJJA and the grant program’s terms, we encourage you to closely collaborate with education, workforce, and other experts—including state agency and system data and research experts and other community members—to design and adopt strategies for accurately collecting, using, and sharing connectivity and other relevant data. Sector partners can provide insights about digital equity and skills gaps among their covered populations and offer expertise about the most appropriate education, workforce and other measures to use for program evaluation.
- **Leverage existing state data systems.** We encourage you to identify existing state education, workforce, and other relevant data systems and describe in the Digital Equity Plan how the systems will be integrated and used to measure the impact of closing connectivity and digital skills gaps on improvements to broadband access and affordability, online accessibility, access to public resources and services, and improved education, workforce and civic outcomes. For example, data on connectivity improvements could be integrated with data on workforce training participants to assess impacts on training program access and completion when connectivity is enhanced. Similarly, existing state agency or local provider data on adult education participants’ digital skills could help to inform the baseline assessment required of states as part of Digital Equity Planning.

**Use Digital Equity Implementation Grant to collect and analyze data.** Satisfying the IJJA’s and Digital Equity Planning Grant’s requirements may require data that is not already collected or analyzed. We encourage you to ensure that your Digital Equity Plan describes how the state will collect any new required data and invest in the proper infrastructure, human resources and capital, and capacities to protect participant privacy and analyze existing and newly collected data consistent with the program’s goals and requirements. For example, this could include beginning a collection of the modality used for secondary and postsecondary instruction—virtual, in-person, or hybrid—to assess to what extent connectivity investments are tied to changes in instructional delivery and student outcomes.

- **Maximize transparency while protecting privacy.** Following the language and intent of the IJJA and Digital Equity Act, we encourage you to clearly articulate in your Digital Equity Plan the steps you will take to ensure transparency of the data you collect and use for the public’s benefit. At the same time, all personally identifiable data that is part of the P–20W data system must be protected according to applicable state and federal laws, including FERPA.

Thank you for considering our ideas for making integrated data systems and effective data use a core element of your state’s Digital Equity Plan. We would be pleased to respond to any questions you have about these recommendations and to share other ideas for supporting this vitally important work to close connectivity gaps in your communities. For questions or

additional information, please contact Kate Tromble, Director, Data Champions Collaborative, at the Data Quality Campaign.

Sincerely,

AdvanceCTE  
All4Ed  
Credential Engine, Inc.  
Data Quality Campaign  
Data Coalition  
Education Analytics  
Foundation for Excellence in Education (ExcelinEd)  
Institute for Higher Education Policy (IHEP)  
Jobs for the Future  
Knowledge Alliance  
National Association of State Boards of Education (NASBE)  
National Center for Learning Disabilities  
National Parent Teacher Association  
National Skills Coalition  
National Urban League  
New America Higher Education Program  
Results for America  
State Higher Education Executive Officers Association (SHEEO)  
The Education Trust  
UnidosUS