
Title **0015** 11/02/2023

by **Iris O'Donnell Bellisario** in **Digital Equity Public Comment (English)** id. 44599162

100 S. Market St.
Wichita, Kansas
67202
United States
919-960-1041
iris.odonnellbellisario@lead4america.org

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Please provide your first and last name Iris O'Donnell Bellisario

Please provide email address iris.odonnellbellisario@lead4america.org

Please provide a telephone number if applicable +13177602454

If you are affiliated with an organization, please provide the organization name Lead for America

If you are affiliated with an organization, please share a brief paragraph about your organization and its work in promoting digital equity

Background on LFA & ACC:

Since 2018, LFA has created over 400 full-time service opportunities for outstanding leaders across the nation. In 2021, LFA began partnering with AmeriCorps and has since recruited over 230 highly motivated, exceptional, and diverse leaders to serve in underserved rural and urban communities across America. RURAL LISC & ACC have partnered together to bring to you feedback regarding the digital equity plans.

In 2021, LFA launched the American Connection Corps (ACC) – a national AmeriCorps program focused on advancing economic prosperity in rural and emerging communities. ACC has specifically focused on through collaborative efforts to expand high-speed broadband and closely focused around capacity on infrastructure and access initiatives, thus closing the digital divide. ACC was developed in partnership with the American Connection Project (ACP), a coalition led by Land O'Lakes, Microsoft, Comcast and over 175 companies and organizations spanning numerous industries, collectively advocating for innovative policies enabling high-speed internet access to all Americans.

Background on LISC

LISC is a nonprofit housing and community organization and certified Community Development Financial Institution (CDFI) with offices in 38 cities nationwide and a rural network encompassing 140 partners serving 49 states and Puerto Rico. LISC's work supports a wide range of activities, including affordable housing, digital inclusion, economic development, building family wealth and incomes, education, community safety, and community health. LISC mobilizes corporate, government, and philanthropic support to provide local community development and business development organizations with loans, grants, equity investments, capacity building, and technical assistance.

LISC supports digital inclusion initiatives in rural and urban communities to ensure that all individuals and communities can fully participate in our society and economy. We believe resilient communities necessitate digital inclusion activities that provide affordable, robust broadband internet options, widely available internet-enabled devices and equipment that meet users' needs, and access to digital literacy training and technical support. With four decades of experience investing in communities' social and economic infrastructure, LISC recognizes the promise of new digital equity investments to help meet the needs of historically disconnected individuals and communities.

If affiliated with an organization, please provide a link to website

<https://www.leadforamerica.org/> AND <https://www.lisc.org/rural/>

Who is your main point of contact if we have further questions? Please provide their name and the best method to communicate with them if they are not the commentor on this form

Taylor Stuckert, taylor.stuckert@leadforamerica.org

Is there any additional background information you would like our office to know?

We have witnessed firsthand the transformative impact of both the Rural LISC cohort model, American Connection Corps and AmeriCorps on individuals and communities alike.

We applaud the historic investment to enhance digital equity efforts afforded by the Infrastructure Investment and Jobs Act. Implemented strategically, these funds will reduce and eliminate historical, institutional, and structural barriers to technology access and use. We greatly appreciate the NTIA's leadership and comprehensive approach to designing and implementing the State Digital Equity Capacity Grant Program and the Digital Equity Competitive Grant Program, which will significantly increase and improve the direction of resources dedicated to removing systemic barriers and providing equal access to opportunity.

We are pleased to offer comments to the Kansas digital equity strategic plan. We offer these comments informed by our experience as an intermediary and support of community-based organizations working on expanding digital inclusion initiatives in rural and urban communities.

Our combined organizations have representatives in Kansas at Lead for America - Wichita, KC Digital Drive Workforce Alliance of South Central Kansas, and Goodwill Industries of Kansas.

Please rank the Kansas digital equity plan on how it accomplishes the following:

Please rank the Kansas digital equity plan on how it accomplishes the following:

Question 1: Outlines the current state of digital equity in Kansas

Well

Question 2: Outlines a vision for digital equity in Kansas that recognizes the state's unique social and economic circumstances

Well

Question 3: Identifies the barriers to digital equity faced by each of the state's covered populations

Question 4: Establishes an implementation strategy to achieve digital equity

Question 5: Describes how Kansas will coordinate and conduct outreach amongst digital equity partners and stakeholders

Question 6: Describes how Kansas will coordinate its use of DEA funding with any funds it will receive in connection with BEAD or other digital equity funding

Question 7: Identifies the assets available to help connect Kansas' covered populations

Question 8: If there are any digital equity assets that you feel have not been listed in the digital equity plan, please list them here

Question 9: Please indicate which sections of the Kansas digital equity plan you are providing comment on

Section 3: Current State of Digital Equity: Barriers and Assets
Section 4: Collaboration and Stakeholder Engagement
Section 5: Implementation

Please provide
comment on Section
3: Current State of
Digital Equity:
Barriers and Assets

Please provide
comment on Section
4: Collaboration and
Stakeholder
Engagement

The Boston Consulting Group studied digital navigator programs over a few years and found from a survey of over 1,500 people that digital navigators can increase the effectiveness of digital equity programs (Kalmus, 2022). With support from a digital navigator, over 65% of survey respondents were able to obtain internet access, computer or tablet at home, and over 85% reported using the internet more (Kalmus, 2022). This illustrates the crucial role that digital navigators play and we need to continue to support these roles across Kansas.

We noted that on page 80 (4.2.2) the plan focuses on rural density, distance and availability and really emphasized the issues with attaching community members to rural meetings. The digital navigator model from ACC & LISC has been empirically proven for effective trust & relationship building within rural communities.

In addition, the plan can look to build the capacity of these nonprofits listed to hire and train staff dedicated to digital inclusion. Currently ACC's partnership with KC Digital Drive has showed how we can help to improve capacity for a local non profit organization. Digital Connectors are an example of how local organizations are working within the community but need more capacity building resources in order to hire and train staff. One role that our ACC members have taken at KC Digital Drive is to educate communities regarding the Affordable Connectivity Program (ACP) eligibility & application process. Local nonprofits can serve as a trusted, community resource which can easily be accessed by members of the community. Many individuals already accessing nonprofit services may also be eligible for federal/state broadband programs.

References:

Kalmus, M., Hill, H., Lee, J., Goodchild, C., & Webb, D. (2022, October 17). A human approach to closing the digital divide. BCG Global.
<https://www.bcg.com/publications/2022/how-to-close-digital-divide-with-human-approach>

Please provide comment on Section 5: Implementation

In the plan draft proposed in September 2023, the Kansas broadband planning office highlights this in the following ways:
On page 84 5.1.1. Strategy 1 highlights leveraging the work of existing partners such as KC Digital Drive
We'd like to see funding expansion for local nonprofits to build out ACP enrollment programs, staff capacity, and volunteer coordination
On page 86 5.1.2 strategy 2 highlights sustainable affordability options for existing partners and programs
We'd like to emphasize expanding digital navigator resources to support these initiatives, ACP outreach efforts and creating sustainable programs that last past the term of the digital equity plan
On page 88 5.1.1 emphasizes the collaboration with in-demand workforce skills

With this context in mind, we believe that the plan needs to be more ambitious. We would like to see the following changes implemented to support digital navigators:
Support the development of a standardized digital navigator curriculum and assessments
Support knowledge sharing between digital navigators that are existing and new digital navigators
Develop dedicated support lines
Invest in research & evaluation to improve existing program design and closely measure impacts

The American Connection Corps's mission is to build a leadership force of moral, dynamic and locally-rooted leaders committed to serving the communities they call home in every corner of this country. ACC commits to building strong communities through service and bridging people together across lines of difference. There is an increasing need for boots-on-the-ground capacity in rural and emerging communities and ACC's model has proven successful in helping to meet this need. Since 2021, ACC has successfully graduated 75 AmeriCorps members, members have hosted over 360+ digital skill-building workshops and community forums, and launched 75+ public-private partnerships. As a result of these members service they have enrolled 6,500+ households into the American Connectivity Program (ACP) Benefits and channeled \$45,503,609 to local communities.

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By submitting this form for public comment and evidence to support your comment, you are accepting responsibility for the accuracy of the information submitted and that it is true and correct to the best of your knowledge. You agree to be contacted by the Kansas Office of Broadband Development, Kansas Department of Commerce should the need arise. Furthermore, by making this submission, you understand that Kansas Department of Commerce and the Office of Broadband Development reserve the right to publicly publish your comment and evidence provided. Falsification of information will result in rejection of future public comment submissions and could result in legal action. Please type your name and today's date in the text box below.
