



NASDAE
National Association of State
Directors of Adult Education

Date: May 1, 2023

To: United States Department of Commerce, National Telecommunications and Information Administration (NTIA)

From: The National Association of State Directors of Adult Education (NASDAE)

Re: NASDAE Comments Regarding:

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

The National Association of State Directors of Adult Education (NASDAE) (<http://nasdae.org/>) appreciates the opportunity to submit comments to the National Telecommunications and Information Administration (NTIA) regarding the implementation of the Digital Equity Act of 2021 and subsequent funding opportunities.

NASDAE represents leadership in U.S. states and territories for programs authorized under Title II of the *Workforce Innovation and Opportunity Act* (WIOA), Adult Education and Family Literacy Act (AEFLA). AEFLA has been continuously authorized since 1964 and funds programs that serve adult learners in every state and territory. In program year (PY) 2021-2022, AEFLA served nearly 900,000 learners, a 27 percent increase from the previous year, and is on track to serve a greater number in the current year. AEFLA programs operate as a federal, state, and local partnership and collaborate closely with community stakeholders and partners to reach and serve the population of adults with needs for basic skill and/or English proficiency instruction and supported occupational training and career pathways development. AEFLA programs are administered through state eligible agencies that ensure compliance and quality through regular competitions, monitoring, a rigorous accountability system, and ongoing technical assistance.

The AEFLA eligible participant list fits NTIA's definition of "covered populations" and we see the need for digital literacy and increased digital skills in our learners and their families every day. We celebrate the resources the Digital Equity Act can bring to our communities to address these needs.

Although the entire Request for Comment is of interest to our work, our comments here focus on Question 23: *How can NTIA encourage the design and implementation of Digital Equity Programs to support and advance the economic mobility of members of Underrepresented Communities/ Covered Populations to support BEAD implementation and broader economic outcomes (e.g., through new skills, upskilling, re-skilling, career pathways, and other high-quality workforce development activities)?*

Addressing these goals is the work of AEFLA programs and our partners. ***We strongly encourage NTIA to require proposals that prioritize building upon the work of established***

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and trusted service providers – like AEFLA programs, volunteer-based literacy programs, and public libraries – already working with the covered populations in locations convenient to learners within communities to address digital equity and literacy needs alongside academic, English language, and workplace readiness skills. These adult education providers are known in the communities, have partnerships that reach deep into underrepresented and multilingual communities, and have experienced staff and instructional practices that are evidence-based. They have the talent, skills, networks, accountability structures, and passion to scale up the work of digital equity but are often limited financially. Requiring established partners builds not only current capacity within communities, but also strengthens those providers for sustainable service when the discretionary funds end.

NASDAE recently submitted [comments](#) to the Department of Labor ([2022-26461](#)) on increasing digital skills and resilience among the adult learner population. NTIA may want to review submitted comments from that national information collection for promising practices and the range of community providers already serving the covered populations. Of note, NASDAE members emphasized that adult education providers were committed to incorporating digital literacy skills into our instruction for all learners, but experience challenges of sustainability of technology and ongoing staff training given our limited allocations. The barriers and challenges identified for the DOL collection are very relevant to the NTIA's information collection to serve the same population. We look to the federal agencies to collaborate and coordinate efforts in ways that will allow state agencies and local providers to do the same.

For questions and additional information, you may contact me at ptyler@nasdae.org.

Sincerely,



Patricia H. Tyler
Executive Director