INDIANA

DIGITAL EQUITY PLAN

Indiana Broadband

INTRODUCTION

The 21st century is increasingly digitizing our economy and society. People, communities, and organizations that are not able to fully participate in this digital economy and society are falling behind and their quality of life is being negatively affected. However, the digital equity landscape is complex. It is critical to understand what this landscape looks like, as well as its related barriers and assets. More importantly, digital equity is a hyperlocal issue for which cookie-cutter approaches will yield limited impact.

In response, the federal government released the State Digital Equity Planning Grant program, part of the Infrastructure Investment and Jobs Act (IIJA), that provides funding for all states and territories to draft a digital equity plan, paying particular attention to eight covered populations. **Covered populations** are individuals that may require additional help in overcoming the digital divide due to unique digital equity barriers and needs. Capacity-building funds will then be distributed to states and territories to aid in the implementation of the plan.

A Closer Look

Covered Populations

1. Individuals who live in covered households*;
2. Aging individuals;
3. Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
4. Veterans;
5. Individuals with disabilities;
6. Individuals with a language barrier, including individuals who—
   a. Are English learners; and
   b. Have low levels of literacy;
7. Individuals who are members of a racial or ethnic minority group; and
8. Individuals who primarily reside in a rural area.

** The term "covered household" means a household, the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census.*

This five-year plan will serve as Indiana's first-ever statewide digital equity plan. The five-year plan contains five sections, including the introduction that outlines the purpose and process for the plan's creation. The next section, *The Current State of Digital Equity*, provides context for the plan by briefly reviewing the data gathering and community engagement that informed this plan. The third section showcases the vision, goals, strategies and objectives that make up the heart of the digital equity plan. Then the fourth section, Moving Forward, puts the plan into action by outlining implementation strategies, an anticipated timeline, and evaluation procedures. Finally, the appendix provides additional resource materials.

The Purdue University Center for Regional Development (PCRD), part of the university's Office of Engagement, in partnership with the Indiana Broadband Office (IBO) and the Indiana Office of Community and Rural Affairs (OCRA), led the planning, which included significant community engagement and multi-layered data analysis to untangle the nuances of Indiana's digital equity landscape. The process will be explored further in the following section, *Plan Creation*.

PLAN CREATION

Plan Contributors

The backbone and driver of this initiative was a newly formed statewide digital equity task force. PCRD, IBO, and OCRA representatives from organizations that work closely with the covered populations (see page 3 for the full list), as well as organizations focused on broader state goals and efforts such as workforce development, education and health. The goal was to engage those with experience and connections to all the covered populations, as well as bringing in major players to avoid duplication of existing efforts and promote collaboration towards common goals. The list below shows the organizations represented on the task force.

- AARP
- City of Bloomington
- Indiana Association of Regional Councils
- Indiana Broadband Office (2 members)
- Indiana Department of Veteran Affairs
- Indiana Department of Workforce Development
- Indiana Office of Community and Rural Affairs
- Indiana Office of Equity, Inclusion, and Opportunity
- Indiana Philanthropy Alliance
- Indiana Rural Health Association
- Indiana Rural Schools Association
- Indianapolis Public Library
- United Way of Central Indiana
- Indiana Department of Corrections

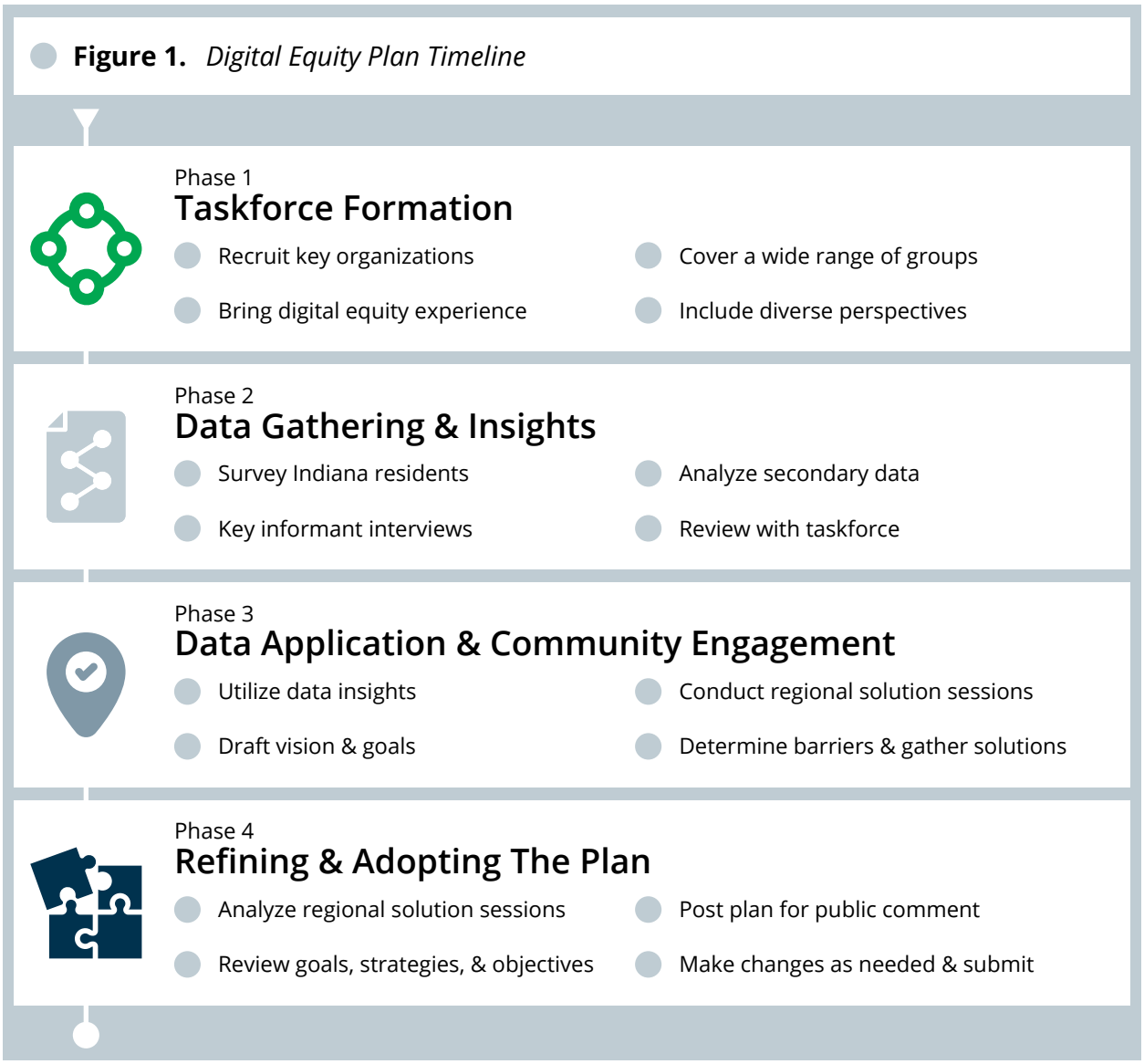
PCRD met at least 10 times with the task force, usually once a month, starting in November of 2022 through December of 2023 both in-person and virtually. The main role played by the task force was to leverage its multiple networks to promote elements of the plan (e.g., digital assets map, recruit digital ambassadors, regional solutions sessions), provide feedback on data reports and insights, and draft the first version of the plan's vision and goals while incorporating feedback from the public.

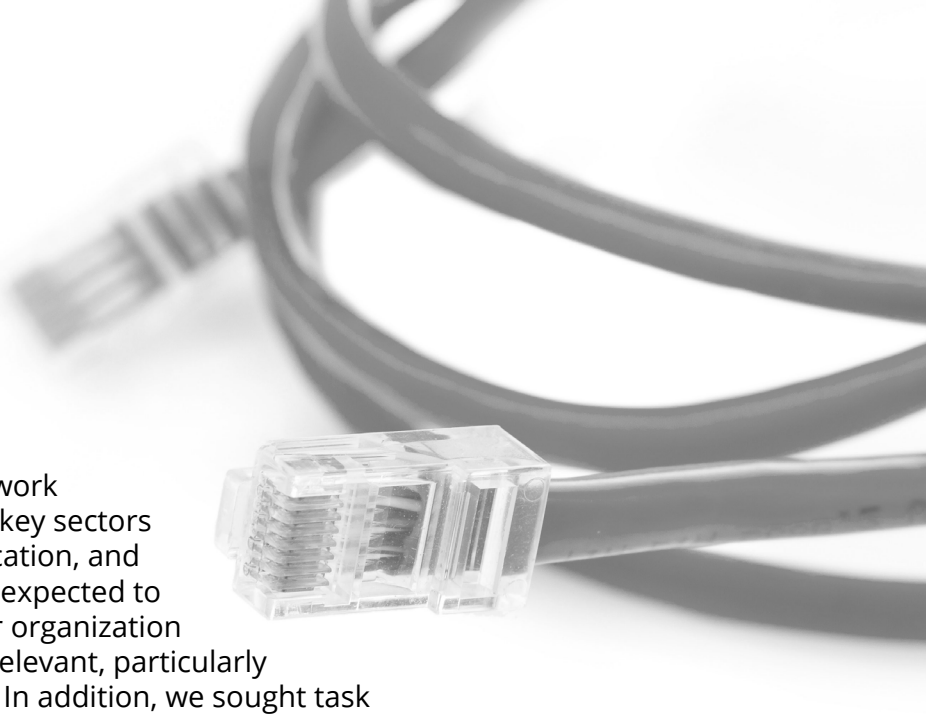
Creation Process

PCRD followed closely the Notice of Funding Opportunity (NOFO) and the templates provided by the National Telecommunications and Information Administration (NTIA) when creating the plan. The PCRD team attended two digital equity trainings organized by the National Digital Inclusion Alliance (NDIA) and the Federal Reserve system. PCRD coordinated extensively with IBO to ensure, as required, the Broadband Equity, Access, and Deployment (BEAD) plan and digital equity plan align.

Given the 12-month digital equity plan deadline, the plan's complexity, and the critical need for community engagement, PCRD designed the plan creation process to consist of four main phases, driven by the Indiana digital equity task force. **Figure 1** below illustrates the phases of this planning process and key elements, with more information on each phase in the following section, *Creation Process*.

Figure 1. *Digital Equity Plan Timeline*





The first phase focused on building a successful foundation for the planning process through forming the task force, as highlighted in the previous section. PCRD worked with the IBO and OCRA to identify organizations and state agencies that would bring essential insights to the planning process, such as those that work closely with covered populations and key sectors such as workforce development, education, and healthcare. Taskforce members were expected to bring first-hand experience from their organization about digital equity to keep the plan relevant, particularly for the audience or sector they serve. In addition, we sought task force members with networks that would help the planning process reach a wider audience. Ultimately, the task force provided a foundation that allowed the planning process to include diverse perspectives from beginning to end.

The second phase of the planning process consisted of gathering relevant data and reviewing with the task force. PCRD utilized multiple avenues for primary data gathering, including a survey of Indiana residents and key informant interviews. In addition, PCRD analyzed data from several secondary data sources, including the U.S. Census Bureau American Community Survey, Lightcast, Google and the Regional Economic Modeling, Inc. Further details on the data gathering process and resulting insights are available in the *Current State of Digital Equity* section.

The third phase of the planning process applied the data insights and began community engagement. The task force used the data gathered so far to draft the plan's vision and goals. Then seven regional solution sessions were conducted to determine barriers and gather solutions to inform the plan's strategies and objectives. More information on the results of the solution sessions are available in the *Current State of Digital Equity* section.

The fourth phase of the planning process was refining and adopting the plan. Once the input from the regional solutions sessions was analyzed, the task force reviewed the updated goals, strategies and objectives. The updated plan was then posted for public comment from January 8 to February 9, 2024 on the Indiana Broadband Office's website. The public comment period was promoted through a variety of channels and shared widely through the task force network and other grassroot organizations. Comments were collected through a dedicated email address and are listed in **Appendix C**.

CURRENT STATE OF DIGITAL EQUITY

Indiana's digital equity landscape is a variegated typography that changes county by county. Since 78.2% of Indiana's population in 2022 lived in metropolitan counties versus 21.8% in nonmetropolitan counties (including rural), it's important to consider the individual needs of each of these communities and their unique digital equity barriers – and that of their requisite constituencies and covered populations (2023 Rural Urban Continuum Code).

Data Gathering and Community Engagement

Drafting the first-ever state digital equity plan warranted a heavy reliance on data, in addition to significant community engagement. This section will go through the data gathering and community engagement conducted to inform this plan. Remember that digital equity can be measured in different ways; therefore, it is essential to consult multiple data sources from secondary data sources like U.S. Census Bureau American Community Survey and Lightcast to primary data like first-hand accounts of those experiencing barriers and digital inclusion practitioners. This section is meant to give an overview of the methods and outputs of this effort to provide context for the results discussed in the *Barriers and Data Insights* section.

Survey

In regards to primary data collection, two efforts were completed. One was a survey and another was key informant interviews. For the survey, PCRD partnered with the Indiana University Survey Research Center to design, validate and conduct the survey. The objectives of this survey were to provide contextual information on the state's digital equity landscape, serve as a benchmark for interventions taking place in the future, and document digital equity differences among groups. Approval from Purdue's Institutional Review Board was obtained and a total of 8,000 Indiana household addresses were randomly selected using an address-based sampling frame stratified by study-specific demographics and geographic target characteristics. The survey was designed to oversample covered populations.

A push-to-web phase consisted of a mailed invitation letter with a web link followed by a paper questionnaire to non-respondents. Approximately five weeks later, a four-page survey was mailed with a cover letter to the remaining eligible sample. A $1 dollar bill was included in both phases as an incentive and $15 VISA gift cards were offered to respondents who submitted a web or paper survey. Responses were weighted and calibrated based on respondent distributions on gender, age, education, race/ethnicity, and urban/rural status. A total of 1,225 responses were captured with an overall response rate of 18.2%. Efforts were made to obtain a representative sample of covered populations (share of responses align with the latest Census distribution). Close to one-fifth of respondents were minorities, 31% were aged 60 or older, 28.7% rural, one-quarter earned less than $35,000, close to 40% had high school or less, 10.5% were veterans, 16.3%

spoke a language other than English at home, and 36% had a disability. A more detailed breakdown of responses and results is discussed in the next section.

While the survey methodology was being drafted, questions for incarcerated individuals were included. However, the Institutional Review Board (IRB) is very strict when surveying incarcerated individuals and other vulnerable populations Since the timeline to complete the plan was very short and the time needed to secure IRB approval can be lengthy, incarcerated individuals were not surveyed. Despite not being included in the survey, incarcerated individuals were represented during this planning process. Personnel from the Indiana Department of Corrections were part of the statewide task force and were also interviewed as key informants in order to better understand the barriers this population faces and potential digital equity solutions.

> *Key Informant Response*
>
> People need access to their device and their device needs to have access to the Internet. When either of those two things isn't true, the barriers just start to compound quite quickly."

Key Informant Interviews

Parallel to the survey, the task force was asked to identify individuals who have experienced digital inequities for a virtual, up to 45-minute semi-structured interview. Most task force members were also interviewed. The objective of these interviews was to document barriers directly from those affected, as well as those who work with affected covered populations. The semi-structured interview asked about ideal uses of digital technology, barriers encountered, potential solutions, existing resources, and who else could be interviewed. A total of 47 key informant interviews were completed, coded and analyzed. **Table 1** summarizes covered populations discussed in key informant interviews either by participants self-identifying or discussing populations they serve. Note numbers are not mutually exclusive.

Table 1. *Key Informant Characteristics*

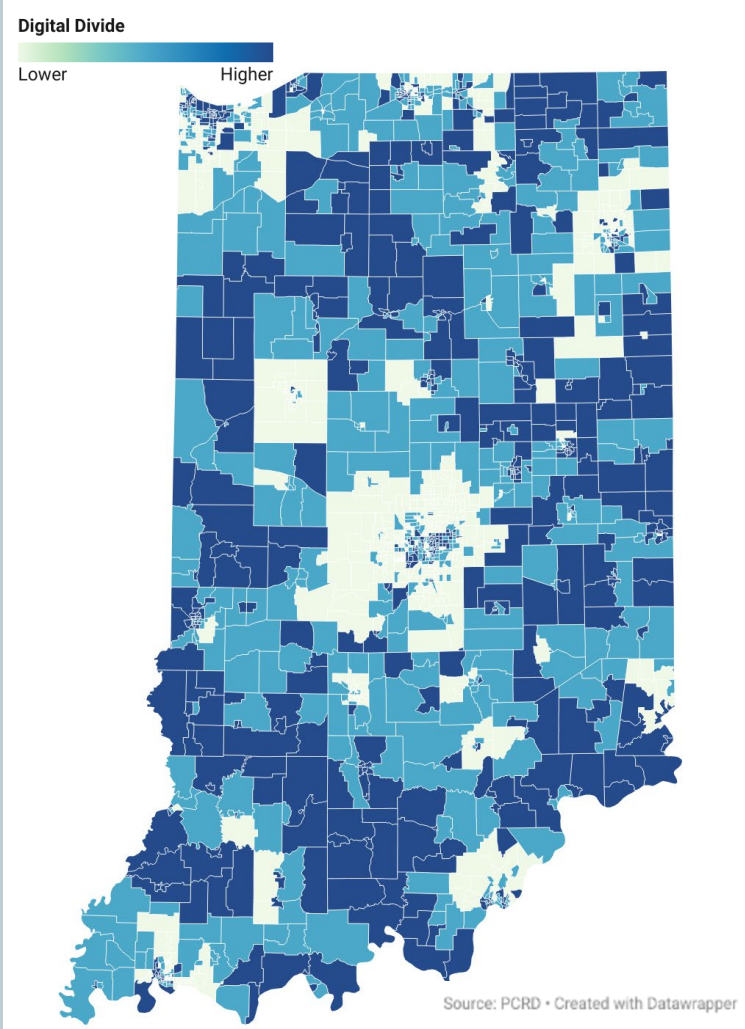
Covered Population	Number of Interviews
Rural Residents	25
Low-Income	27
Aging Individuals	12
Work with incarcerated individuals	8
Veterans	3
Individuals with disabilities	11
Individuals with a language barrier	10
Individuals who are members of a racial or ethnic minority	11

Secondary Data Sources

In regards to the analysis of secondary data sources, multiple reports were completed. These reports were discussed in depth with the task force to jumpstart meaningful conversation around digital equity and inform them as they worked on the vision and overarching goals of the plan. Summaries and snippets from these reports were shared on social media and at the regional solutions sessions to better inform stakeholders on the digital equity landscape in the state.

First, a state of the digital divide in Indiana and a regional digital inclusion profile report were completed that provided insights on digital equity across the state. The innovative metric developed by PCRD was used when analyzing the state of Indiana's digital divide. Census tracts and counties across Indiana were divided into low, moderate, and high—based on their digital divide index (DDI) scores. Low and high geographies were then compared across a host of socioeconomic variables. **Figure 2** shows Indiana tracts divided into low (lighter blue), moderate, and high (darker blue areas) digital divide areas as shown in the *State of Digital Divide in Indiana* report.

Figure 2. *2021 Indiana Census Tract by Low, Moderate, or High Digital Divide*



Results indicate that a higher share of rural, minority, veteran, poor, disabled, limited English proficient households, and senior citizens live in high digital divide areas compared to low digital divide areas. Likewise, a lower labor force participation rate, educational attainment, share of digital economy jobs, and share of occupations requiring high digital skills were present in high digital divide areas compared to low areas across the state. *Read the full report here.*

On the other hand, the regional digital inclusion profile looked at additional variables across six regions defined by OCRA. Total population trends by age group, racial/ethnic breakdown, educational attainment, rurality, poverty, and other variables

were analyzed (mostly at the Census tract level) for stakeholders to better understand the socioeconomic and demographic context under which digital equity is taking place. Likewise, the geographical distribution of some covered populations were analyzed as well.

Digital equity variables such as digital distress and the digital divide index were also analyzed. Lastly, digital economy, workforce and economic development variables were also analyzed to better understand the implications and potential of digital equity. **Figure 3** shows the location of individuals with any disabilities in Indiana (taken from the digital inclusion profile report). *Read the full report here.*

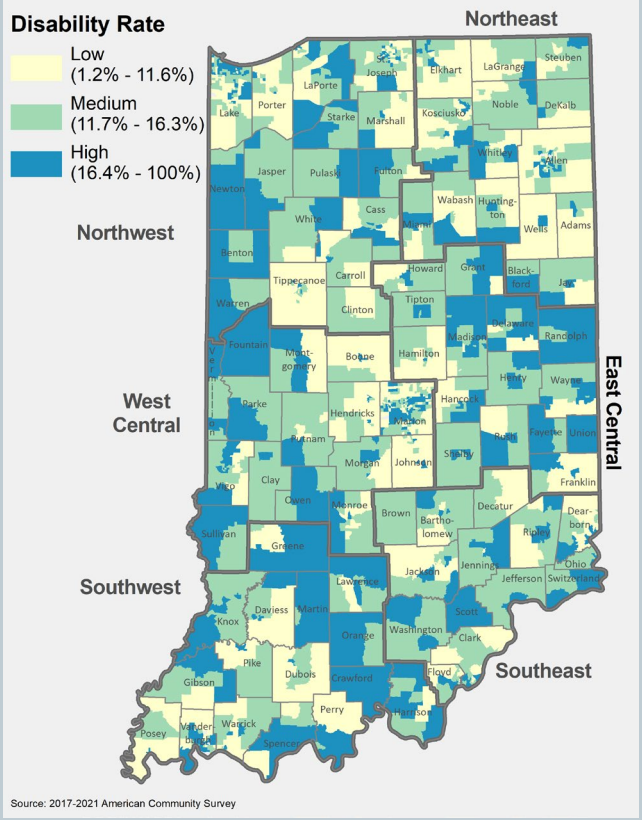
A Closer Look

Check Out These Analyses of Secondary Data

- State of the Digital Divide in Indiana
- Regional Digital Inclusion Profile
- Digital Equity & Covered Populations Hotspots
- Impact of Next Level Broadband Connections and Indiana Connectivity Program Investments
- The Impact of Remote Work

Second, to better help digital equity stakeholders prioritize and be strategic about where digital equity interventions may be needed, an *interactive digital equity and covered populations hotspot map* at the Census tract (neighborhoods) level was presented to the task force and eventually released to the general public. This map showcases neighborhoods that are in the highest group based on the state distribution of the share of covered populations as well as digital distress variables. In other words, this map is a visual guide to identify areas more likely to require digital equity interventions keeping in mind their share of covered populations.

Figure 3. *2021 Share and Location of Individuals with Any Disability*

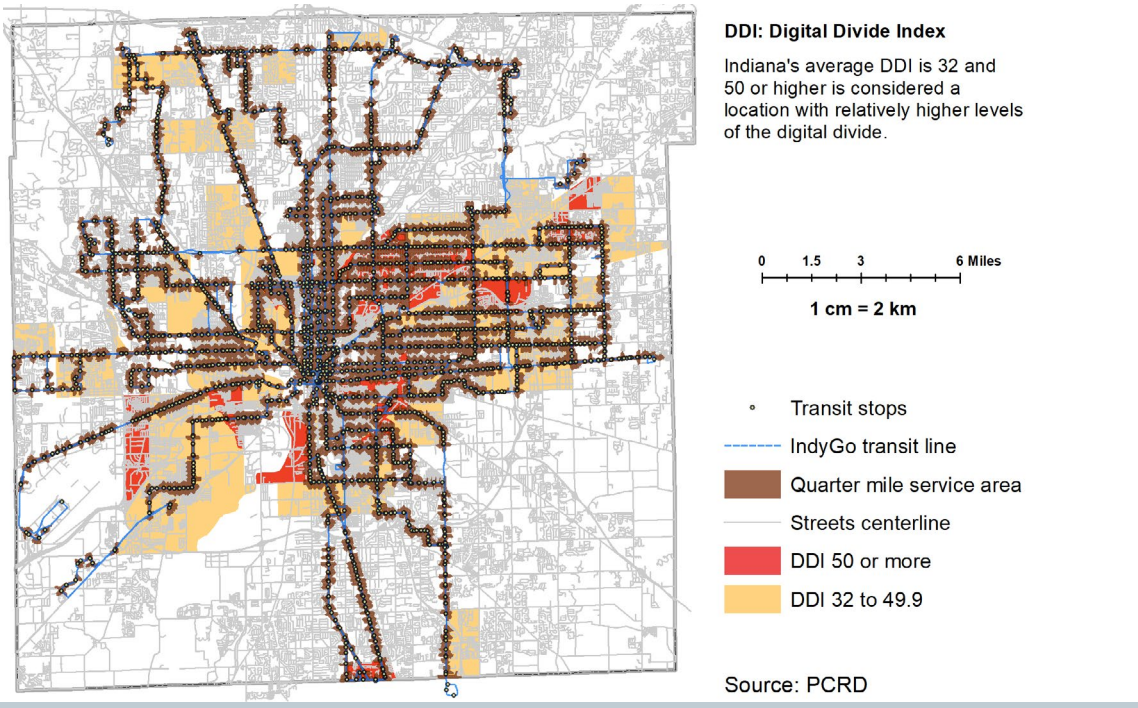


Third, a preliminary scenario planning for digital inclusion and equity in Marion County (home to the state capital, Indianapolis) was completed using multiple datasets. The objective of this analysis was to explore spatial mismatches between transportation accessibility, the digital divide, poverty and racial/ethnic minorities by overlaying real-time labor market information (e.g., general and remote/hybrid job postings, living wages), transportation accessibility (e.g., public transit stops and routes), race/ethnicity, poverty and digital divide index spatial data. Preliminary results showed that:

- Remote/hybrid job postings have proportionately increased from 2.5% in 2018 to 12.5% in 2022 in Marion County.
- Proportionally more remote/hybrid options have higher educational requirements than non-remote options.
- Racial/ethnic minorities and poverty are spatially concentrated in Marion County. Transit routes and stops do not cover all these concentrated areas of racial/ethnic minorities and high poverty. Similarly, transit routes and stops do not serve all areas with a high digital divide, as measured by the digital divide index.

This means that single mothers, a higher share of which are minorities and poor, are the least likely to benefit from remote/hybrid jobs paying more than the living wage. They, in turn, may have to rely on traditional jobs, that while paying a living wage, may require transportation. Hence, the barriers for racial/ethnic minorities and poor populations include education, broadband, and transportation accessibility. **Figure 4** shows areas with no public transit service overlap with high digital divide areas in Indianapolis.

Figure 4. *2021 Public Transit Stops and the Digital Divide, Marion County, IN*



Finally, a general equilibrium model was purchased and used to gather insights on the *impact of broadband infrastructure investments* (a significant barrier to digital equity) as well as *remote workers* including its impact on specific socioeconomic groups. These insights were critical to help stakeholders understand the "what if" of digital equity in the state. In other words, the impacts documented by the model would be much larger were digital equity a reality. This analysis also helped showcase that there are existing opportunities in place that can be leveraged or augmented if digital equity were a reality in Indiana.

> *Key Informant Response*
>
> The need for access to the Internet or devices has moved from something that's incredibly helpful to something that's just absolutely vital."

Multiple secondary data sources were analyzed, including Census data as well as proprietary datasets, resulting in several reports and insights that informed both the task force as well as the solutions sessions participants and general public. Additional innovative metrics developed previously by PCRD were also analyzed (e.g., digital divide index and digital distress). More importantly, these data insights resulted in the state's *digital equity dashboard*, a group of 19 variables that will be monitored to gauge the state's digital equity landscape during the next five years. These include data on school-aged children, seniors, race & ethnicity, digital distress, household income, and the digital economy.

All these reports and data analysis yielded significant insights to inform the task force on the state of digital equity in Indiana. A summary of findings, from both the primary and secondary data, was prepared and shared with the task force and in several statewide public forums.

Asset Inventory

Digital equity in the state does not happen in a vacuum. Consequently, this section provides an overview of an asset inventory completed as part of this planning process. First, a summary of digital asset mapping is discussed followed by a review and integration of existing digital equity plans and resources in the state.

Asset Mapping

The statewide digital equity task force helped instigate the promotion of an interactive digital assets map with the intent for it to be crowdsourced by Indiana residents and organizations. The objective was to gain a sense of where existing digital assets are located across the state.

The Indiana Geographic Information Office provided a map of community anchor institutions (CAIs) such as schools, nonprofits, and other organizations in Indiana. Representatives from these organizations were able to type an address to find that particular CAI and verify its address. If a CAI was not included, users could contact PCRD asking for this CAI to be added to the fabric.

Once the CAI was located, users were asked to complete a short form capturing information on digital assets available at that location such as public Wi-Fi, space for digital literacy workshops, availability of public computers, etc., as well as listing the audiences they mostly work with or target such as the general public, rural populations, veterans, etc.

This crowdsource effort will continue, but as of early October 2023, digital assets information was gathered on 143 CAIs. Close to three-quarters of these CAIs offered public Wi-Fi, close to 60% had meeting space available, and a little more than half had computers available for the public. However, less than 17% had a device loaning program while less than one-quarter had a hotspot loaning program. See the full breakdown of assets at CAIs in **Table 2**.

Table 2. *Breakdown of Assets at Community Anchor Institutions (CAIs)*

Assets	**Total** (n=143)	**Percent Total**
Public Wi-Fi	103	72.0
Computer(s) for Public Use	73	51.0
Hotspot Loaning Program	34	23.8
Device Loaning Program	24	16.8
Digital Skills Training	68	47.6
Meeting Space	85	59.4
Other	32	22.4

Regarding the audiences they primarily work with or target, close to 90% work with the general public, close to two-thirds with aging individuals, and a little more than 60% with disabled individuals. Less than one-fifth work with incarcerated individuals while a little more than 42% work with veterans. **Table 3** shows the breakdown of CAIs for each covered population.

Table 3. *Breakdown of Community Anchor Institutions (CAIs) for Each Covered Population*

Covered Population	**Total** (n=143)	**Percent Total**
General public	128	89.5
Rural populations	79	55.2
Aging individuals	93	65.0
Incarcerated individuals	26	18.2
Veterans	60	42.0
Individuals with disabilities	88	61.5
English language learners	76	53.1
Individuals with low levels of literacy	85	59.4
Racial or ethinic minorities	86	60.1
Other	16	11.2

Figure 5 summarizes the digital assets recorded thus far for each region.

Figure 5. *Summary of Digital Assets Per OCRA Region*

Table 4 shows a sampling of digital equity assets captured so far through the asset map. *See the full interactive map of assets here.* Click on any dot in the interactive map to learn more about the asset or filter the map to your specifications.

Table 4. *Sampling of Digital Equity Assets Per Organization*

Organization	Assets	Populations Served
Central Library - Indianapolis Public Library	Public WiFI, Computer for public use, Digital skills training, Meeting space, Assistive Technology Room (adaptive tech), Affordable Connectivity and Lifeline Phone Enrollment Assistance. Sign language interpreters available upon request for digital skills programs, Social Worker, computer use help (open lab)	General public, Aging individuals, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
South Bend Community School Corporation Adult Education	Computer use for Adult Education students, Hotspot loaning for students, Device loaning for students	General public, Rural populations, Low income, Aging individuals, Incarcerated individuals, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
Elmer Buchta Technology Center	Public WiFI, Computer for public use, Digital skills training, Meeting space, Maker Space	General public, Rural populations, Aging individuals, Incarcerated individuals, Low income, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
Hartford City Public Library	Public WiFI, Computer for public use, Hotspot loaning program, Meeting space, Access to local newspapers, circulating materials (digital and physical), museum passes for checkout	General public, Rural populations, Aging individuals, Veterans, Individuals with disabilities, Individuals with low levels of literacy, Racial or ethnic minorities, Children and teens
Jefferson County Public Library	24/7 public access wifi, Computer for public use, Hotspot loaning program, Meeting space	General public, Rural populations, Aging individuals, Incarcerated individuals, Low income, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
WorkOne (The Region 5 Workforce Development Board)	Public WiFI, Computer for public use, Digital skills training	General public, Rural populations, Aging individuals, Incarcerated individuals, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
Muncie Area Career Center Adult Education	Device loaning program	Incarcerated individuals, English language learners, Individuals with low levels of literacy, Individuals pursuing their High School Equivalency or certification training

Table 4. *Sampling of Digital Equity Assets Per Organization (continued)*

Organization	Assets	Populations Served
Osher Lifelong Learning Institute at Indiana State University	Digital skills training, Meeting space	Aging individuals
Hanover College	Public WiFI, Computer for public use	General public, Rural populations, Aging individuals, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
WorkOne (Northeast Indiana)	Computer for public use, Digital skills training	General public, Rural populations, Aging individuals, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
Indiana Wesleyan University Fort Wayne Education Center	Public WiFI, Digital skills training, Meeting space	General public, Aging individuals, Incarcerated individuals, Veterans, Individuals with disabilities, Racial or ethnic minorities
Indiana Wesleyan Kokomo Campus	Public WiFI, Digital skills training, Meeting space	General public, Rural populations, Aging individuals, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities
Purdue University Extension Blackford County	Digital skills training	General public
The Open Resource	Device giveaway program, Digital skills training, Meeting space, Digital Navigator Project, Computer Help Desk	General public, Rural populations, Aging individuals, Veterans, Individuals with disabilities, Individuals with low levels of literacy, Racial or ethnic minorities
Jefferson County Broadband Taskforce (Commissioners)	Public WiFI, Computer for public use, Hotspot loaning program, Device loaning program, Meeting space	General public, Rural populations, Aging individuals, Veterans, Individuals with disabilities, English language learners, Individuals with low levels of literacy, Racial or ethnic minorities

Existing Digital Equity Plans

Although this is Indiana's first-ever statewide digital equity plan, Indiana residents have been working collaboratively over the past five years to create community, county, and regional-level plans. Indiana currently has six local digital equity plans targeted at the city, county or regional level. In addition, Indiana has one federally recognized tribe, who do not have a plan at this time. PCRD reviewed these plans with the taskforce during the data gathering phase of the planning process. General digital equity themes, such as access, devices and digital skills were identified across the plans. While all the plans address digital equity issues, they go about it in different ways. Based on these characteristics three categories of plans emerged, equity-focused, economic development-focused and community development-focused. The taskforce took these insights and incorporated them into the the state plan's goals, strategies and objectives.

Equity-Focused Plans

identify populations vulnerable to the digital divide and focus on creating opportunities for all residents.

- **Topics**

  Affordable Connectivity Program, targeted audiences, audience-specific resources and programs, etc.

- **Plans**

  City of Bloomington Digital Equity Strategic Plan, South Bend Digital Equity Roadmap

Economic Development-Focused Plans

incorporate digital inclusion into economic development strategies.

- **Topics**

  Small Business Support, Workforce Digital Skills, Business Connectivity, Digital Agriculture, etc.

- **Plans**

  Boone County 5-year Digital Inclusion Plan, Carroll County Digital Inclusion Initiative

Community Development-Focused Plans

incorporate elements of the other two categories with the ultimate aim of addressing digital equity for all facets of the community.

- **Topics**

  Community/Regional collaboration, device programs, digital literacy ecosystems, community and economic development

- **Plans**

  Rush County Digital Inclusion Plan, Southeastern Indiana Regional Digital Inclusion Plan

Moving forward new digital equity plans are not just expected, but encouraged through objectives such as those under strategy 3.1. Groups developing local or regional digital equity plans will be encouraged to collaborate with the state taskforce and statewide practitioner networks developed by the plan. Ultimately, the state plan should provide avenues to support local or regional digital equity plans by including similar digital equity themes, offering funding opportunities and developing resources for success.

State Plans and Goals

Digital equity does not happen in a vacuum, so as part of the planning process the taskforce gathered plans that overlap with the state digital equity plan. In each of the reviewed plans, the ability of Hoosiers to access digital infrastructure, devices, resources or skills is somehow mentioned. **Table 5** lists each of the plans reviewed, what parts of that plan mention a facet of digital equity, and what goal, strategy or objective of this digital equity plan correlates with that plan.

Table 5. *Other State Plans and Correlations to the Indiana Digital Equity Plan*

Plan Name	Organization	Parts of this Plan Relevant to Digital Equity	Correlation with Indiana's Digital Equity Plan's Goal/ Strategies/ Objectives	Correlation with Measurable Objectives from page 43	Correlated Digital Equity Outcomes*
Indiana's Multi-Sector Plan on Aging	Indiana's Family & Social Services Administration (FSSA) – Division of Aging	Goal 5	Goal 1	1,2,3,4,5	Health, Civic and Social Engagement, Other Essential Services
Indiana's State Service Plan	Serve Indiana	Priority Area 1	Goal 3	2,3	Economic and workforce development, Educational, Health, Civic and Social Engagement, Other Essential Services
The Indiana State Library's 2022-2027 Strategic Plan	Indiana State Library	Goal 6	Goal 1, 2, and 3	2,3,4,5	Economic and workforce development, Educational, Health, Civic and Social Engagement, Other Essential Services

** Find more information on how Indiana's Digital Equity plan impacts and interacts with state outcomes in key areas on page 51.*

In addition, the taskforce reviewed policies from 6 organizations: Indiana Association of Regional Councils (IARC), Indiana Department of Workforce Development (DWD), Indiana Rural Schools Association, Indiana Office of Equity, Inclusion, and Opportunity, Indiana Department of Veterans Affairs, and the United Way of Central Indiana. See a summary of the analysis for these plans and policies in the *Implementation* section.

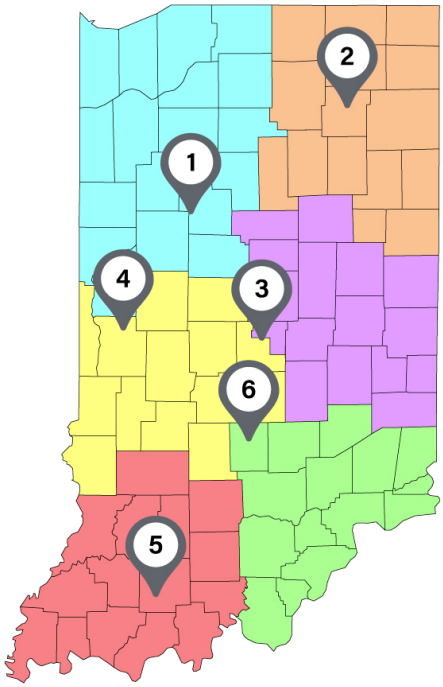
Regional Solutions Sessions

The regional solutions sessions were designed to validate barriers and capture solutions from attendees, including digital ambassadors. This resulted in barriers being validated and numerous solutions being captured and translated into the plan's strategies and objectives. Digital ambassadors representing individuals from several covered populations who have experienced and overcome digital inequities were recruited by task force members. They were recognized at the regional solution sessions and their input was extremely valuable. A total of 148 participants discussed 137 barriers and 388 proposed solutions. **Figure 6** shows the locations of the in-person and virtual meetings across the state.

Solutions Sessions Snapshot

Solution Session for the Northwest Region held in Delphi, Indiana

Figure 6. *Regional Digital Solutions Sessions Across Indiana*



	Participants	Digital Ambassadors	Barriers	Solutions	OCRA Region
1 Delphi	22	3	25	100	Northwest
2 Columbia City	17	3	22	45	Northeast
3 Indianapolis	39	4	27	51	East Central
4 Turkey Run	17	2	13	73	West Central
5 Huntingburg	15	2	10	57	Southwest
6 Nashville	28	3	27	57	Southeast
Virtual	10	1	13	5	Statewide
Total	148	18	137	388	Statewide

Summary of Community Engagement

Community engagement was essential to informing this plan, particularly from each of the covered populations. The planning process included multiple engagement methods, recognizing that people may feel more comfortable engaging in one over another. The formation of the task force kicked off the engagement by bringing in stakeholders representing the covered populations and key state activities (see the full list of organizations represented on the task force on page 4). In addition to participating throughout the plan's creation, the task force used their networks to inform the plan and to disperse engagement opportunities. One of these was the key-informant interviews, which started with task force members, who would then refer 4-5 individuals to participate, and those participants would recommend an additional 4-5 participants. The result was a variety of participants, including individuals of all covered populations, practitioners who work with one or more covered populations, and other key stakeholders. A similar process was used to promote the regional solution sessions, gather submissions for the asset map, and market the plan during the public comment period in order to reach all covered populations.

Data Insights and Barriers

The digital equity landscape in Indiana is a complex one. This section provides an overview of the insights gained from data gathering, including when available, information on covered populations. Remember that digital equity is multi-faceted and can be measured in different ways. While this section is not meant to be comprehensive, it is important to keep in mind that the variables discussed next are but one way to understand this issue. Ultimately, the objective is to outline data insights and identify barriers.

The process of data analysis and community engagement yielded documentation of multiple digital equity barriers in Indiana. The results showed many barriers overlapped across all covered populations with overarching issues being similar. To make discussion of the insights and identified barriers easier, the documented barriers were grouped into five buckets. While these buckets will be used to structure the insights discussion, it is important to note that there is significant overlap between the buckets. Unless otherwise specified, these barriers affected most of the covered populations analyzed.

Access

According to the 2017-2021 American Community Survey (ACS), 24.7% of households in the state did not have home internet access or relied solely on cellular data to access the internet. When looking at urban versus rural (one of the covered populations), this percentage was 22.7% in urban areas versus 30.2% in rural areas of the state, clearly showcasing digital inequities between urban and rural.

When looking at income and location, a similar pattern emerges regarding home internet access. Roughly 30% of households making less than $35,000 per year did not have home internet access compared to 5% of households making $75,000 or more per year. When comparing urban and rural, 36.8% of rural households making less than $35,000 per year did not have home internet access compared to 28.7% of urban households. Clearly, location and income play a role in Indiana's digital inequities measured by home internet access.

By The Numbers

24.7%
of Indiana households do not have internet access

30.2%
of rural Indiana households do not have internet access

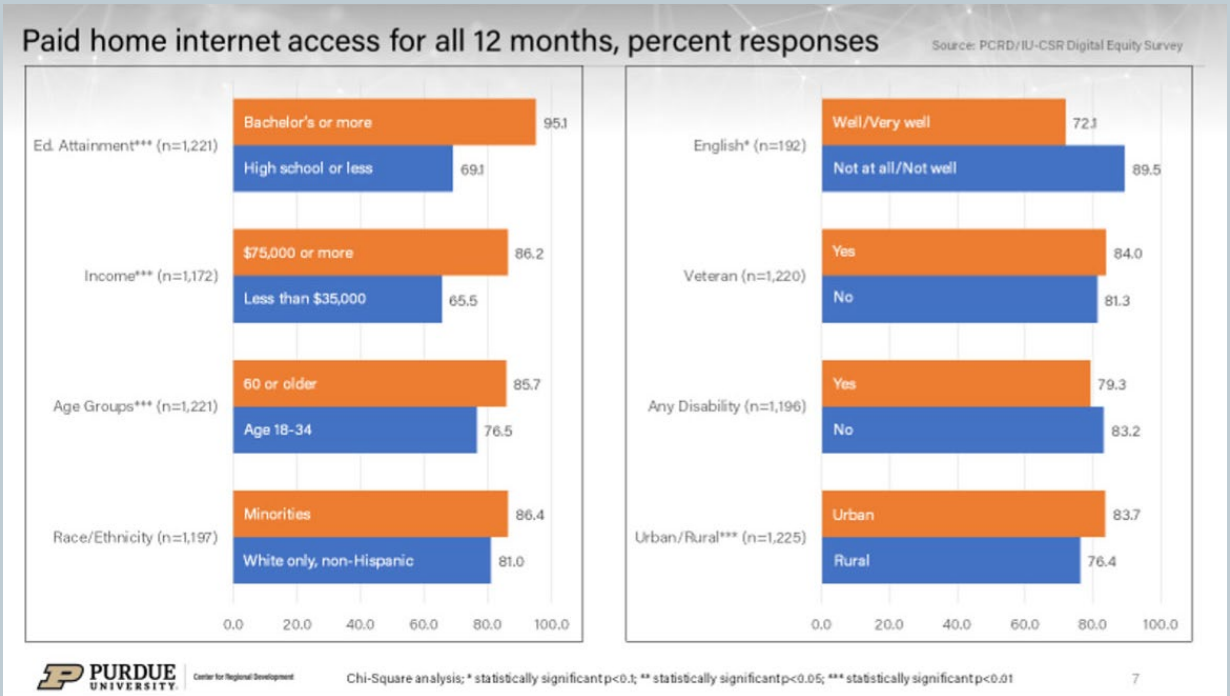
86.4%
of Indiana minorities paid for internet access in the last 12 months

When looking at school-aged kids, according to the ACS, the percentage of children aged 3 years or older enrolled in school without a computer or internet in pre-kindergarten through 4th grade was 7.6% compared to 7.3% in 5th through 8th grade and 6% in 9th through 12th grade. However, the share of these students is higher in rural areas, especially among younger kids, where 13.2% of pre-kindergarten through 4th graders did not have a computer or internet (6.7% in urban areas), 13.7% of 5th through 8th graders (6.7% in urban areas) and 8.3% of 9th through 12th graders (5.7% in urban areas).

In addition to the Census data, the digital equity survey and key informant interviews also shed light on important data insights. The survey was administered using both paper copies mailed to random addresses, as well as online. A total of 1,225 responses were gathered. Efforts were made to obtain a representative sample of all covered populations (share of responses align with the latest Census distribution). To learn more about this survey data, view the blog series on *Indiana's Digital Equity Landscape*. Close to one-fifth of respondents were minorities, 31% were aged 60 or older, 28.7% were rural residents, one-quarter earned less than $35,000, close to 40% had high school or less, 10.5% were veterans, 16.3% spoke a language other than English at home, and 36% had a disability.

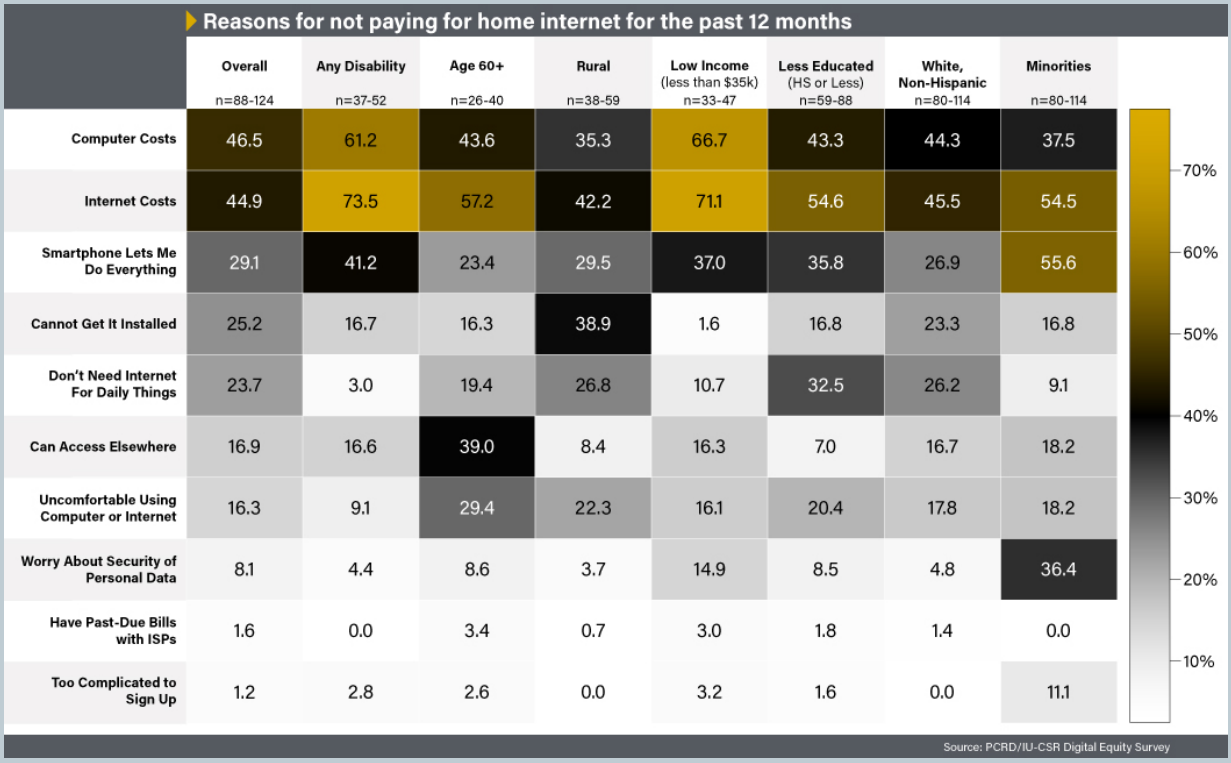
Overall, 81.6% paid for home internet for all previous 12 months while 5.9% paid for some months and 12.4% did not pay for home internet; among covered population groups the largest difference was between those with a bachelor's or more (95.1%) and those with high school or less (69.1%); an unexpected finding was that a higher share of minorities (86.4%) paid for home internet compared to whites (81%); as expected, a higher share of urban respondents (83.7%) paid for home internet compared to rural (76.4%). See **Figure 7** for differences between surveyed groups.

Figure 7. *Share of Survey Respondents by Groups*



The main reason overall for not paying for home internet was the cost of computers and internet service. The main reason for those ages 60 or older, disabled, rural, low-income, less-educated, and white was internet cost while the main reason for minorities was that their smartphone lets them do everything. **Figure 8** summarizes the reasons why covered populations did not pay for home internet for all of the previous 12 months. Note that affordability, either of devices or home internet service, were the top reasons regardless of covered populations.

Figure 8. *Summary of Reasons for Not Paying for Home Internet for All of the Previous 12 Months*



Devices

When it comes to devices, the share of households in Indiana without devices or relying solely on mobile devices was close to one-quarter. Again, when looking at urban and rural areas of the state, differences emerge though not as large as with home internet access. Roughly one-quarter of urban households did not have computing devices or relied solely on mobile devices compared to close to 28% in rural areas.

Another factor to be considered when looking at digital inequities is the age group. According to the 2017-2021 ACS, not having a computer is more of an issue among the senior population (age 65 or older) compared to children (under 18) in Indiana. About 16% of seniors did not have a computer versus 3.2% of children. Regarding computers but no internet, the difference was lower at 7.5% seniors compared to 5% children. When looking

at urban and rural areas, differences exist but are lower: close to one-fifth (18%) of seniors in rural areas did not have a computer compared to 16% in urban areas.

Regarding race and ethnicity, some differences also became apparent. For example, the percentage of white residents with a computer but no internet was 5.5% compared to 8.3% of black and 6.9% of Hispanics. Regarding having a computer, the percentage of white residents was 5.5% versus 8.2% of black and 4.6% Hispanics. Interesting trends are seen when, again, looking at urban versus rural areas. Close to 9% of white residents in rural areas did not have a computer compared to 4.6% in urban areas; regarding black residents, the percentage was 3.5% in rural versus 8.5% in urban; and for Hispanics, the percentages were 2.7% in rural versus 5% in urban areas.

By The Numbers

28%
of rural Indiana relies solely on mobile devices or has no computing device

18%
of seniors in rural areas do not have a computer

43.5%
of survey respondents do not own a home desktop computer

In addition to the Census data, the digital equity survey and key informant interviews also revealed important data insights. A little more than one-third of survey respondents did not own a tablet, 43.5% did not own a desktop, and close to one-quarter did not own a laptop; 9.1% of respondents were smartphone-only of which the majority were less educated, lower income, younger, white, and urban.

In addition, access to devices is also an issue for incarcerated individuals, just on a different scale as explained by one key informant interviewee:

> *"Well, I will tell you that although I didn't spend a lengthy amount of time within the walls, there are many, many, many people who are doing 10 plus years. There are many people that are inside the facilities who are going on 20 years that they've been incarcerated, have never held a cell phone in their hand, have never even surfed the Internet. And these people are expected to become successful when they get released; on getting employment, paying their fines and fees, overcoming the stigma that society has really put on us or them."*

Given the rapid change in technology, individuals who are out of the loop for any amount of time can quickly fall behind. Moving forward, it is essential that programs and resources address this.

Use

In addition to the Census data, the digital equity survey and key informant interviews also detailed personal accounts of needs expressed and barriers encountered that helped PCRD and the task force better understand digital inequities.. Overall, 92.1% of survey respondents used the internet daily over the previous year; of those that did not use the internet daily, the main reasons were not having a desktop or laptop followed by home internet costing too much. In addition, close to one-third were not interested in doing things online and did not feel comfortable using the internet.

The majority of respondents said internet use increased their ability to find up-to-date information on local events, entertainment options, opportunities to stay in touch with friends and family, ability to do day-to-day tasks more quickly, and access and use healthcare services. A little more than one-third reported an increase in their anxiety and 28.8% an increase in negative perceptions towards other people or groups.

The top online tasks for which respondents felt very and extremely confident was accessing online banking (82.3%) followed by finding educational content and information (73.5%). The share of respondents feeling very and extremely confident accessing and applying for government services was the lowest with 63.7% followed by creating a resume with 67.5%.

Overall, close to two-thirds of respondents said they search online or rely on family when needing help with devices and/or internet; however, ages 60 or older, rural, lower income, and less educated rely on family more followed by searching online.

By The Numbers

92.1%
of respondents used internet daily in the past year

82.3%
of respondents used internet for banking tasks

25.5%
of jobs require a high skill level of digital literacy

In addition to socioeconomic variables, analyses were completed on workforce and economic variables that are also affected by digital inequities. The hope is that as digital inequities are addressed, these variables will also improve in an inclusive way. According to the Bureau of Economic Analysis, about 1.9% of jobs in the state were related to 44 industries that are fully part of the digital economy (does not include warehousing and retailing related to e-commerce). The share of digital economy jobs in urban counties was 2.1% versus 1.1% in rural counties. In addition, the share of jobs requiring low digital skills, as well as high, was close to one-quarter for each. However, the share requiring high digital skills in urban counties was 25.5% compared to less than one-fifth in rural counties of the state. Looking at those working from home, 7% of workers aged 16 or older worked from home. This share was higher in urban counties at 7.6% and lower in rural counties at 3.9% (shares include farmers).

Finally, it is essential to equip incarcerated and formerly incarcerated individuals with the resources to use the internet successfully. One key informant interview participant put it best:

> *"And I will tell you one of the biggest things that we have been really trying to push is to get them educated on what a resume looks like. I don't know a company these days that accepts paper resumes anymore. It's all digital. These people have no clue what that means, how to upload a file, how to manage a bank account. How do you use a debit card? One thing that I always like to say is I could be your neighbor. Your daughter-in-law. Would you not want me to be successful? Would you not want me to have the tools I need to be successful and to change the pattern? Right. I don't wanna be that statistic. I don't wanna be that person. Who comes out and goes right back to doing what they were doing because they don't have the tools necessary to survive in today's digital world. And we know it's a digital world."*

With more services going online, incarcerated individuals and formerly incarcerated individuals need the skills to accomplish these essential tasks. Programs and resources are needed to not only build digital skills, but to have the knowledge to navigate these essential services.

By The Numbers

32.9%
of respondents are not interested in doing things online daily

31%
of respondents feel uncomfortable using the internet daily

Mindset and Trust

Mindset and trust emerged as an issue across several data sources. In the survey, mindset can be attributed to why many respondents are not using the internet daily. **Figure 9** shows the reasons for not using the internet daily overall and for each covered population. The first two reasons have to do with access, but then 32.9% of respondents reported they were not interested in doing things online. No matter the reason for not being interested, the root cause here comes down to mindset. In addition, 31% of respondents reported feeling uncomfortable using the internet. While this may be a gap in digital skills, it could also be an issue with trust, as is reflected in feedback from the solution sessions and key informant interviews.

Figure 9. *Summary of Reasons for Not Using the Internet Daily*

PURDUE UNIVERSITY
Center for Regional Development

Reasons for not using internet daily

	Overall n=55-77	Veterans n=5-6	Any Disability n=17-23	Age 60+ n=17-26	Rural n=17-28	Low Income (less than $35k) n=28-39	Less Educated (HS or Less) n=44-58	White, Non-Hispanic n=48-61	Minorities n=4-10
Don't have desktop/laptop	55.4	77.5	11.9	55.5	48.4	56.3	65.4	62.0	17.7
Home internet costs too much	42.0	10.6	71.6	36.3	46.5	46.6	49.8	43.2	60.9
Not interested in doing things online	32.9	5.1	12.9	41.9	59.4	19.1	42.4	33.6	23.6
Uncomfortable using the internet	31.0	3.9	6.4	38.8	56.5	16.5	40.4	34.7	17.2
Devices are too expensive	29.7	10.8	38.9	33.7	30.6	28.4	38.1	32.2	26.9
Security concerns	29.3	2.0	12.3	39.8	34.9	26.4	37.8	34.7	17.4
Ran out of smartphone data too quickly	10.0	0.0	4.2	0.6	2.1	18.0	12.6	6.8	27.6
Asked for help, but did not get it	9.6	2.1	0.0	0.6	0.6	20.6	12.8	12.5	0.0
Devices are not reliable	8.7	70.8	5.4	3.1	3.4	15.8	11.4	8.5	9.7
Can't get good internet access at home	7.6	4.2	0.8	4.3	9.3	10.6	7.9	9.3	0.0
Don't know where to get help	3.9	2.0	4.9	8.5	3.2	8.1	5.0	3.3	10.4
Hard to get to places with internet access	3.1	2.0	7.4	3.6	0.8	5.1	2.7	1.0	14.2
Places with internet have hours that don't work for me	1.5	2.0	0.0	3.4	3.4	1.3	0.6	0.0	0.0

70% 60% 50% 40% 30% 20% 10%

Source: PCRD/IU-SRC Digital Equity Survey

Context

The final bucket that emerged from the data is that people's context matters, for all covered populations, and barriers often compound upon one another. During the solution sessions, while discussing skilling up existing workers, one participant mentioned the importance of funding childcare during digital skills classes. Having classes outside working hours could prevent some people from attending as they would need to set up childcare. So we need to be aware of people's existing context and how barriers can build on one another.

This pattern showed up repeatedly in the key informant interviews. One interviewee talked about the complications with unhoused populations or those in temporary situations:

> *"We have a lot of unhoused populations, a lot of people who are in temporary accommodations and they just aren't able to make a commitment to a more permanent solution. They're in transitional housing or temporary housing, so that could be things like a domestic violence shelter or maybe they're in the process of transitioning to a permanent address. They, of course, have options like hot spots. But if you're unhoused or in those unstable situations, there's a fear that resources like technology might be stolen, lost or damaged. So they tend to want to hold back until they feel like they have that kind of point of stability in their life. And then they're willing to make a decision. They also tend to see a lot of decision overload. Because of that instability, making a commitment like, 'I'm going to use $100 to buy a device' or, 'I'm going to make a commitment to this service' without someone like a digital navigator or someone to help guide them through that process. It can be very overwhelming because it's so many decisions all at once."*

Another interviewee talked about how the barriers compound for some justice-involved individuals:

> *"Lots of people that come out of the prison system are unemployed or underemployed…They don't have credit to get an AT&T-type contract, and we're in rural Indiana, so we have very few options like Boost [Mobile] and Cricket [Wireless] but that's it. There's not a whole lot of non-contract places around out there, too."*

The context of people's situations can not only impact their access to and use of technology, but their ability to find assistance. One interviewee told us about his experience working with racial and ethnic minorities:

> *"So one is access to technology, but whether one, it's accessible in places that they also feel comfortable going to and are welcomed. So whether someone says, yes, there's technology displays go use it, but if when you walk in, it's not bilingual and someone can walk you through in terms of how to log in, no one's gonna go from the community. So I'll start there with access to technology. And access to it in places that are welcoming to the community….Is it readily available when they need it? The fact of the matter is people get off of work at 5, 6, 7 o'clock at night or they get off at five*

or six. I've gotta go pick up their child from a youth and Community Center. Maybe go grocery shopping, make dinner and at the end of the night at 8:00, o'clock is when they're gonna apply for the job. Is the library open? Is the Community Center open? Is someone readily available to help him at those times? I think that's that's that's that's the big gap. It's when are we meeting people or people being met with their needs when they need them? And I get that's reactionary. But that's the reality of life for some folks and that's the reality we have to also pivot. We can't always be Uber proactive which is great but sometimes we have to be reactive to the needs of our community."

This idea of meeting people not just where they are but where they are comfortable extends to veterans as well. During the Digital Equity listening sessions, a couple of participants recognized similar needs in the veteran population, and proposed the following:

- Digital Equity programs should partner with the VA and other vet focused organizations to reach veterans
- Utilize American Legion, VFW, to reach veterans with digital equity resources.
- Include digital literacy in to "stand down events" for reaching younger veterans
- Target tele-health training for veterans.
- Use VA as a support system for digital education.

These are just a few examples, and these situations may not be unique to these populations. But they illustrate the importance of being aware of the context in which our target audiences live in in order to support auxiliary services.

Barriers

Identifying the barriers to digital equity in Indiana required a heavy reliance on data, in addition to significant community engagement. The resulting barriers for all covered populations fall into five buckets and the previous section reviewed the insights related to these five buckets. In summary, the five buckets of barriers can be defined as follows:

Access	An important barrier documented was lack of internet access, mostly in rural areas of the state. Secondary data, survey responses, key informant interviews, and regional solutions sessions confirmed that lack of affordable access to internet service is an issue across all covered populations, but particularly in rural areas. Lack of competition and options was also mentioned as an issue.
Devices	Survey respondents and key informant interviews confirmed that the No. 1 barrier to digital equity in the state is affordability of devices (e.g., laptop, desktop). A close second reason was the cost of internet service. For those ages 60 or older, disabled, rural, low-income, less-educated, and white, the primary reason for not paying for a home internet subscription was the cost of the service.
Use	Paid home internet subscriptions across groups varied with the educational attainment category having the largest difference. Minorities said their smartphone lets them do everything online and thus a home subscription is not needed. Regarding internet use, security concerns, lack of internet, not feeling comfortable, and low literacy were barriers for not using the internet more frequently, as was the lack of a laptop/desktop. Personal life situations such as transportation, income, and rurality affected individual digital equity as well.
Mindset and Trust	Some key informants, as well as roundtable discussions during the regional solutions sessions, identified that lack of trust in technology across all covered populations contributes to digital inequity. In addition, not understanding how the internet can personally benefit individuals was also documented, hinting at a mindset and cultural issue. Lastly, lack of awareness on resources and community support were also issues for folks to subscribe to home internet and/or use the technology more frequently.
Context	Barriers can compound and create additional hurdles people need to overcome to leverage digital technologies. It's important to be aware of the context in which digital equity services are provided, particularly for each covered population, and support auxiliary services that reduce these barriers.

This section has highlighted how extremely nuanced digital equity is within the state. This data for all covered populations laid the foundation for the goals and strategies drafted by the taskforce. Then, this data also drove the conversation at the digital equity solution sessions that determined the objectives. All of this is presented in the next section of the plan.

THE DIGITAL EQUITY PLAN

The vision for Indiana's digital equity plan is based on the data gathered and analyzed through community engagement in multiple industry clusters throughout the state. The vision is as follows:

> *Indiana residents trust and use innovative connectivity for improved quality of life, resulting in inclusive and resilient communities that ensure opportunities for all.*

Of course, this vision is not attainable without a clear and measurable outline of the goals, strategies, and objectives needed.

Goals/Strategies/Objectives

Goal 1

Provide Indiana residents with universal connectivity that is affordable, accessible, reliable, equitable and available in public and private spaces to ensure maximum adoption.

Goal 1 will be addressed by assessing metrics tied to measurable objective 1, which tracks the affordability of access to fixed and wireless broadband technology.

Goal 1 is directly supported by Implementation Strategy 4: Develop necessary programmatic infrastructure for evaluation. To allocate digital equity resources, we must be able to collect and analyze data and differentiate allocation based on the varying and diverse needs of the state's communities.

Goal 1 is also directly supported by Implementation Strategy 5: Continue to document Digital Equity needs and update the plan. Digital equity data will be assessed on a regular basis and allocation will be strategic to the ever-changing needs of the state's population.

Strategy 1.1: Assess and educate interested parties in a community to help provide full coverage of the state with high-speed internet access.

Objective 1.1.1: Develop a program to inventory assets in the community critical for full connectivity (e.g., grain silos, towers) and identify partnerships for creating equitable access.

Objective 1.1.2: Develop a toolkit for municipal and county governments to streamline broadband deployment (e.g., Broadband Ready certification) with a strong emphasis on equity.

Objective 1.1.3: Collaborate with trusted community partners to develop and market accessible home internet subsidy programs, specifically targeting areas with an above-average share of covered populations.

Objective 1.1.4: Ensure community anchor institutions—especially in areas with an above-average share of covered populations—have access to ultra-fast and reliable connectivity that meets their needs.

Objective 1.1.5: Collect best practices for operating public Wi-Fi access points and publish as part of the Indiana Digital Asset Map available through community anchor institutions with special recognition of public access sites that are safe and secure.

Objective 1.1.6: Pursue and promote programs that result in data on Indiana's connectivity landscape empowering leaders to make data-driven decisions on broadband infrastructure investments.

Objective 1.1.7: Launch and/or support existing hotspot lending programs. Collect best practices for hotspot lending programs and publish as part of the Indiana Digital Asset Map and facilitate a network of practitioners for program growth and improvement.

Objective 1.1.8: Support innovative ways to provide connectivity to specific audiences such as:

- Students outside of schools for class work
- Adult learners to access supplemental education and training
- Post-release justice-involved individuals to advance economic prosperity

Objective 1.1.9: Establish an awards program to recognize organizations that work to create equitable access.

Strategy 1.2: Strengthen existing incentives and/or develop new programs for Internet Service Providers (ISP).

Objective 1.2.1: Provide incentives to ISPs that complement existing programs aimed at upgrading existing networks and reaching cost-prohibitive and unserved areas.

Objective 1.2.2: Expand eligibility of state programs to ensure affordable connectivity access that meets the needs of the consumer.

Objective 1.2.3: Waive state fees for broadband highway easement access, especially those in areas with an above-average share of covered populations.

Objective 1.2.4: Streamline pole attachments and make-ready regulations, especially those in areas with an above-average share of covered populations.

Objective 1.2.5: Facilitate collaboration between interested parties and ISPs to help Hoosiers take full advantage of ISP assistance programs.

Objective 1.2.6: Develop and deploy resources for starting an ISP and/or supporting small ISPs.

Objective 1.2.7: Work with BEAD and other funding programs to establish reporting and evaluation expectations to increase accountability and transparency.

Objective 1.2.8: Incentivize community reinvestment for ISPs by prioritizing funding for ISPs that report investments in service areas with an above-average share of covered populations.

Objective 1.2.9: Facilitate opportunities for ISPs and interested parties to discuss community needs and strategize solutions.

Strategy 1.3: Create and equip informed consumers to increase demand and encourage adoption.

Objective 1.3.1: Cultivate broadband-informed consumers through supporting partnerships that educate and build awareness about broadband.

Objective 1.3.2: Incorporate a database of available broadband into the Indiana Digital Asset map to inform availability for current and future residents.

Objective 1.3.3: Develop a system for consumers to report concerns regarding home internet service to create accountability and transparency.

Objective 1.3.4: Encourage and support partnerships and programs providing technical assistance with home internet set-up.

Goal 2

Ensure all Indiana residents have access to affordable devices needed to live, work, and thrive along with the education to utilize that technology safely and successfully.

Goal 2 will be addressed by assessing metrics tied to measurable objective 5, which measures the affordability of consumer devices and technical support for those devices.

Goal 2 is directly supported by Implementation Strategy 2: Collaborate with existing organizations to achieve objectives. The device landscape in Indiana includes an interplay between public agencies, private businesses, and nonprofits. Collaboration will be a key element of expanding device adoption and developing capacity for device loaning and giveaway programs.

Strategy 2.1: Expand availability of quality and reliable devices in the community relying on local device-related assets to educate and repurpose.

Objective 2.1.1: Launch and/or support existing device loan or giveaway programs, prioritizing programs that already serve covered populations and provide continual tech support. Include peripheral devices (such as printers and assistive devices, microphones, etc.) necessary for full participation in the digital economy.

Objective 2.1.2: Collect and publish best practices for operating device giveaway or device loan programs and facilitate a network of practitioners to share experiences and innovations.

Objective 2.1.3: Find ways to sustain and subsidize device giveaway programs and/or offset the costs of device recycling/refurbishing programs.

Objective 2.1.4: Build capacity to support one-to-one devices in schools and beyond (e.g., churches).

Objective 2.1.5: Establish community "tech hub" designation and/or facilities to provide devices, technical support, and space for digital literacy workshops. Prioritize tech hubs serving covered populations and filling specific needs within those communities. Collect and publish best practices through creating a community of practice to share experiences.

Objective 2.1.6: Develop device refurbishing skills through programs where participants can refurbish and keep a computer.

Objective 2.1.7: Incentivize businesses, organizations, and individuals to donate retired devices to refurbishing programs.

Objective 2.1.8: Create and market a directory of computer labs/tech hubs, device lending programs, and device giveaway programs in the state of Indiana.

Objective 2.1.9: Ensure assistive technology is readily available and affordable, making these devices (for the disabled community and other covered populations) available via lending programs.

Strategy 2.2: Develop educational and trusted technical assistance programs to maximize device adoption and use.

Objective 2.2.1: Encourage, fund, and support partnerships that educate the public how to safely use devices.

Objective 2.2.2: In collaboration with lending programs, schools and libraries, develop digital literacy programs that supply devices upon successful completion and are invested in maintaining and updating them.

Objective 2.2.3: Engage with schools for the deaf and blind to connect individuals in those communities to help them access non-standard devices. Build capacity in schools to access assistive technology and leverage resources to keep them affordable.

Objective 2.2.4: Support educational resources and programs that equip consumers to make educated device purchases and build awareness about the importance of quality device ownership.

Objective 2.2.5: Leverage existing tech hubs/computer labs for digital skills classes and support existing educational programs.

Goal 3

Build digitally resilient and equitable communities by supporting new and existing ecosystems for local prosperity.

Goal 3 will be addressed by assessing metrics tied to measurable objective 2, measurable objective 3, and measurable objective 4. Measurable objective 2 measures the online accessibility and inclusivity of public resources and services. Measurable objective 3 assesses digital literacy levels of all covered populations. Measurable objective 4 measures the awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual.

Goal 3 is directly supported by Implementation Strategy 1: Develop, support, and coordinate state, regional, and local digital equity coalitions. With the development of coalitions, planning will be attuned to localized digital equity needs.

Goal 3 is also directly supported by Implementation Strategy 3: Coordinate with BEAD implementation and other state digital equity or broadband initiatives. Understanding that the Digital Equity plan is being implemented in a dynamic broadband ecosystem, coordinating with other initiatives will enable Indiana to adapt targeted localized efforts to ever-changing localized needs.

Strategy 3.1: Expand digital equity-focused capacity at the local level.

Objective 3.1.1: Fund and support local digital equity coalitions responsible for making digital equity a priority in the community and for coordinating related efforts.

Objective 3.1.2: Invest in storytelling to secure community buy-in and increase awareness of what a fully connected community can achieve.

Objective 3.1.3: Invest in and recognize partners conducting innovative digital equity programs.

Objective 3.1.4: Facilitate opportunities for coalitions across the state to exchange best practices and resources to ensure statewide progress towards digital equity.

Objective 3.1.5: Expand funding sources through engaging community partners that generate savings/benefits from widespread device use.

Objective 3.1.6: Develop a digital equity bootcamp for local leaders and provide recognition for those who complete the program.

Objective 3.1.7: Support and fund coalitions or other organizations in creating local or regional digital equity plans that support the statewide plan and address local barriers for covered populations.

Objective 3.1.8: Partner with organizations that work with covered populations to fund initiatives or elevate voices to ensure that community solutions are meeting their unique needs.

Strategy 3.2: Ensure digital equity goals contribute to the community's quality of life.

Objective 3.2.1: Create a recommended whitelist of appropriate college and employment websites–and other community resources–for use in device lending/ giveaway programs.

Objective 3.2.2: Develop guidelines and provide technical assistance to ensure government and civic online services and information are accessible to all.

Objective 3.2.3: Recognize Indiana-based websites/web services going above and beyond to be accessible to all.

Objective 3.2.4: Encourage and support programs connecting residents with local digital services, such as telehealth, online banking, or government/civic services, to cultivate prosperous online communities.

Objective 3.2.5: Collaborate with partners to explore programs and policies protecting children in the digital age.

Objective 3.2.6: Develop digital equity recommendations for incorporation and consideration in local Continuity of Operations (CoOp) plans and encourage coalition involvement in CoOp development.

Objective 3.2.7: Support programs that leverage telehealth to address healthcare deserts and meet the unique needs of covered populations.

Objective 3.2.8: Encourage, support and fund programs and resources according to best practices for digital civic engagement between local residents and leaders.

Strategy 3.3: Integrate digital equity into economic development strategies.

Objective 3.3.1: Educate leaders on the implications of artificial intelligence.

Objective 3.3.2: Leverage existing and future broadband infrastructure for workforce attraction.

Objective 3.3.3: Develop and support Digital Agriculture programs and resources that allow Indiana farmers to stay competitive.

Objective 3.3.4: Invest in skilling up the workforce by identifying workers that would benefit from re-skilling, identifying companies willing to shift their culture to support the integration of digital skills through adult education programs.

Objective 3.3.5: Collaborate with local employers to incentivize digital skill programs by hosting on-site learning opportunities and investing in the offline training of their workers.

Objective 3.3.6: Provide incentives to employers who provide remote work opportunities and incentivize employees who work remotely to attract new residents.

Objective 3.3.7: Collaborate with local employers to develop and support high school classes that teach employable digital skills.

Objective 3.3.8: Incentivize employers to provide home internet access or home devices to their workforce.

Objective 3.3.9: Support and fund programs/resources that provide the assistance necessary to include the Amish community in the digital economy.

Objective 3.3.10: Develop a toolkit for LEDOs/ Economic Development Corporations on strategies to and benefits of incorporating digital equity into economic development plans.

Objective 3.3.11: Invest in a revolving loan fund that owners of home businesses, micro businesses, and start-up entrepreneurs can benefit from to scale up their digital capacity.

Objective 3.3.12: Support and fund the development and delivery of programs and resources that build digital skills among small businesses and cultivate unique digital communities for Indiana towns/cities/counties.

Strategy 3.4: Equip residents to participate in the digital world safely and prosperously.

Objective 3.4.1: Support and fund digital skills programs for parenting in the digital age, as well as a digital citizenship training program for adults to build their online social interaction skills.

Objective 3.4.2: Support and fund digital skills programs on online safety and privacy, specifically for covered populations.

Objective 3.4.3: Provide Digital Citizenship Training for adults and build skills to socialize virtually and increase media literacy.

Objective 3.4.4: Continue to develop trainings around emerging technology, such as artificial intelligence (AI), and relevant safety and ethical concerns.

Objective 3.4.5: Support and fund digital skills classes to maximize the benefit of online activities in daily life (such as completing paperwork online, shopping, banking, locating information).

Objective 3.4.6: Address the learning curve for justice-involved individuals as they come out of incarceration.

Objective 3.4.7: Collaborate with and support programs and resources that offset the hidden costs of digital skills training by providing wrap-around services and incentives.

Objective 3.4.8: Sustainably fund, hire, and deploy digital navigators or other similar human capital in the community to personally assist with overcoming obstacles to digital inclusion. Prioritize building on existing programs, particularly ones that have trusted relationships with individuals from covered populations.

Objective 3.4.9: Support integrating digital skills in adult education programs.

Objective 3.4.10: Collect and publish best practices for conducting digital skills training; recognize programs that excel in such training; and provide opportunities to learn and grow from one another statewide.

Strategy 3.5: Build a central location for digital equity resources and programs.

Objective 3.5.1: Develop an online repository of the information and resources to support this plan's objectives including the Indiana Digital Asset Map.

Objective 3.5.2: Market the repository and distribute the materials to community resource centers and libraries so they are equipped with digital equity resources.

Objective 3.5.3: Publish digital equity metrics and plan evaluation summaries as part of the repository.

MOVING FORWARD

Implementation

The Indiana Broadband Office (IBO) will be the key facilitator when implementing this plan, conducting stakeholder engagement, as well as responsible for monitoring measurable objectives. After this initial planning phase, the IBO will use the guidelines established in the forthcoming Digital Equity Capacity Grant Notice of Funding Opportunity to guide implementation. During this time, the IBO will continue to engage stakeholders, including all covered populations in addition to key state activities, in a number of ways, as well as evaluate progress on the plan's objectives and the state's overall progress on digital equity. The following sections outline the intended activities for implementation, stakeholder engagement, and evaluation.

Implementation Strategies

It is important to note that the implementation of this plan will be significantly influenced by the funding guidelines for the Digital Equity Capacity grant. IBO, PCRD, and the state Digital Equity taskforce have sought to make a comprehensive plan. While the intentions at this time are to address all the key activities laid out in the *Goals/Strategies/Objectives* section through creating or supporting programs and resources through partnering with organizations and tailoring to the unique needs of each covered population, the priorities and methods to conduct this work will be greatly driven by the forthcoming funding guidelines. Upon receiving the guidelines, the IBO will adjust this implementation and begin moving forward with addressing digital equity in Indiana. Given these limitations, the plan currently presents the following Implementation strategies.

> *Implementation Strategy 1: Develop, support, and coordinate state, regional, and local digital equity coalitions*

To ensure this plan is effective, efficient, and sustainable, a key component that will also incorporate critical community partners, is the creation of digital equity coalitions. These coalitions will serve as the mechanism through which digital equity will be customized, partners will be engaged, priorities will be identified, and resources will be leveraged. These coalitions will also diversify digital equity's stakeholders to ensure an intersectional approach. Coalitions will include key community groups groups, such as workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, and educational service agencies and partners working on other community issues that may be affected by grant implementation (e.g. health, housing, economic development) in addition to all the covered populations.

IBO and other partners will work to transform the existing statewide digital equity task force into a statewide digital equity coalition. This statewide coalition will broaden the type and number of digital equity stakeholders and in turn, will support and augment regional

and/or county-level digital equity coalitions. These coalitions will be critical to not only implement the plan but also ensure sustainability and community buy-in and connect researchers and practitioners.

Given the importance of addressing the multifaceted barriers to digital equity and the intersectional nature of our efforts, these coalitions will include groups representative of the local community. Coalitions will include but not be limited to workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, educational service agencies, libraries, school systems, local governmental offices, healthcare providers, Purdue Extension, and groups advocating for covered populations, as well as representatives of each and every covered population. Outreach efforts will also be conducted with the intention to source coalition members from community foundations, workforce development offices, American Legion Chapters, labor unions, faith-based groups, Indiana recovery network, and others.

Implementation Strategy 2: Collaborate with existing organizations to achieve objectives

The IBO will work with organizations in Indiana who have a history of successfully working with covered populations or addressing digital equity to carry out the plan objectives. This includes supporting existing programs or resources, as well as the creation of new programs or resources. Through the planning process, the IBO has already worked with the state digital equity taskforce and PCRD to identify existing digital equity programs and/or resources, many of which are featured in the digital equity map and discussed in the *Asset Mapping* section. Building on existing assets and relationships will not only utilize funding in the most impactful way, but be essential to successful intervention. Potential partners include, but are not limited to, are workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, and educational service agencies. While the funding guidelines will determine the exact nature of the collaboration between IBO and partner organizations, collaboration will be key to plan success.

Implementation Strategy 3: Coordinate with BEAD implementation and other state digital equity or broadband initiatives

From the start of this plan there has been coordination with the BEAD plan, particularly with objectives in Goal 1. Moving forward, IBO intends to continue the coordination between the two plans as IBO works to implement the plans concurrently.

In addition, Indiana has state-funded broadband initiatives such as Next Level Connections and the Indiana Connectivity Plan. The broadband office will stay abreast of all state, local, and federal initiatives. It will be important to coordinate between these initiatives and the implementation of this plan to avoid duplication and increase the impact of the invested funds. Efforts will also be made to create effective communications resources that help state residents distinguish between broadband resources and find the programs that are most applicable to their circumstances.

Implementation Strategy 4: Develop necessary programmatic infrastructure for evaluation

IBO will continue to establish the infrastructure needed to ensure this plan has the intended impact and is sustainable. First, IBO will develop a sound project and impact evaluation strategy and ensure that any projects that are implemented as part of this plan include project and impact evaluation requirements. Appendix B outlines examples of the kind of metrics the IBO will seek to collect for each objective. These metrics may change based on the project and what is reasonable or available to collect. The next step is developing a collection system that is compatible with the funding guidelines.

Second, IBO will develop a *digital equity dashboard* for evaluation and accountability purposes. This dashboard will rely primarily on secondary data and will be updated at least annually. This dashboard will complement project-specific metrics, as mentioned above. This dashboard will complement the other online resources outlined in the plan under Goal 3, Strategy 5 and is contingent on the digital equity capacity grant funding and applicable guidelines.

Implementation Strategy 5: Continue to document Digital Equity needs and update the plan

Digital Equity is a constantly evolving issue due to the nature of technology. Already, IBO has worked to cultivate relationships with practitioners in Indiana, from internet service providers to non-profit organizations. In addition, IBO will seek to gain further insights into digital equity and update the plan through building relationships with workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, and educational service agencies. These relationships will be important for gaining insight into the evolving digital equity context in Indiana that will inform plan priority activities and necessary plan updates. To gain these insights, the IBO will continue to build a network within Indiana as well as host stakeholder engagement events as allowed by the forthcoming digital equity capacity grant funding guidelines.

It is important that the Indiana Broadband Office continues to monitor the impact of its Digital Equity Plan over time. The IBO will implement a midpoint survey, which will be analyzed to monitor the progress of our measurable objectives and identify gaps that may exist between our measurable objective goals and mid-point data. We will then strategically allocate resources and tailor existing programs to close gaps. The IBO plans to utilize its comprehensive inventory of assets and partnerships to expand and enhance existing digital equity infrastructure. This will include work with academic institutions such as IVY Tech, expansion of resources such as NorthStar Digital Literacy, and analysis of state-collected GIS data and Indiana's office of Equity, Inclusion, and Opportunity's public disparity dashboard. The IBO will pay special attention to gaps observed among covered populations and removing barriers to access identified in our digital equity plan. The IBO intends to use clear and concise language in our communications with the public and work

with other state agencies to ensure that Indiana's public resources are accessible and easy to understand. Community partners have also indicated in public comments that making data readily available to all will help community-based organizations and anyone participating in the digital equity ecosystem tailor programs and adopt best practices. For this reason, Indiana contracted with PCRD to create a digital equity dashboard where data is collated in an accessible format and available to the public. Moreover, this data and information sharing will allow industry, philanthropy, and government to incorporate a holistic understanding of the digital equity landscape into their own efforts.

In conclusion, this implementation strategy, as outlined above, will help address existing gaps in state, local, and private efforts to ensure digital equity is a reality in the state of Indiana by tackling directly the barriers identified. This implementation, which relies primarily on local coalitions coordinated regionally and statewide as well as partnering with organizations who have a history of effectively working with one or more of the covered populations, will empower communities and secure buy-in. This in turn will make any digital equity efforts sustainable. Because of this robust approach, where all covered populations are targeted across multiple areas (e.g., economic development, education, health) and programs (e.g., connectivity, devices, skills), and key groups such as workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, and educational service agencies, an empowered local planning and implementation mechanism is warranted.

Stakeholder Engagement

Stakeholder engagement has been pivotal in the creation of this plan and it will continue to be for the implementation of this plan. As outlined in the previous section, stakeholder engagement will serve multiple purposes including forming digital equity coalitions, partnering to achieve plan objectives, and informing and updating the plan. To accomplish this, several of the stakeholder engagement strategies conducted during the planning process will continue. The survey conducted at the start of the planning process will be repeated. In addition, the Digital Equity State-wide task force will be continued and transformed into a coalition. The State-wide task force was chosen for their experience with covered populations or key state activities. Their networks were used to garner input and participation from all the covered populations and key state sectors. A list of organizations represented on the taskforce is available on page 4. Moving forward, local or regional digital equity coalitions will be encouraged to recruit members representative of each covered population as well as key groups such as workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, and educational service agencies. This will expand the network of connections with all covered populations, as well as key groups, to ensure representation at stakeholder engagement events. These activities will be complemented by new engagement activities, including those expressed in the plan such as the development of practitioner networks and collaboration opportunities. Additional community engagement events will be held as allowed by the forthcoming digital equity capacity grant funding guidelines. Regardless of the engagement method, IBO will include voices and organizations representing each covered population, as well as key groups such as workforce agencies, labor organizations, community-based organizations, institutions of higher learning, education/training providers, and educational service agencies.

Evaluation

To ensure Indiana's digital equity plan works toward the state vision and has a positive impact on digital equity, evaluation is key. A comprehensive evaluation strategy will be developed by IBO that will have two overlapping layers: one layer will focus on project specific evaluation and the other layer will focus on impact evaluation.

Evaluation will be done through multiple methods. Secondary data related to overarching themes and barriers will be tracked and analyzed to gain insight into the plan's overall impact. Further primary data collection will supplement the gaps in secondary data. In addition, granular project-specific tracking will be done on a project-by-project basis. This two-prong approach allows for tracking and reporting on plan-funded interventions and how they impact the overall digital equity landscape.

In order to impact the digital equity landscape in Indiana, this plan outlines interventions through the goals, strategies, and objectives on page 31. To track progress and impact, any funded initiatives to implement this plan will be expected to report output and outcome metrics, some of which are featured in Appendix B. Having standardized metrics across the multiple projects will allow for individual project metrics to be combined. These combined metrics will show the progress the plan has made, and assist in course correction as lower metrics can show where further funds need to be invested or updates and modifications to the plan are needed. Ultimately, these outputs and outcomes will have an impact on the macro digital equity variables.

Macro-level digital equity variables will be used to measure the impact of plan implementation. These have been sorted into five measurable objectives, which are discussed in the following section. The digital equity variables were identified through the previously outlined data gathering PCRD conducted using secondary and primary data sources. These provide a baseline for the current digital equity context in Indiana. By repeating the data gathering in five years, we can track overall progress in Indiana on digital equity. This will include repeating the survey of individuals and analysis of secondary data, some of which are currently featured in the digital equity dashboard.To learn more about the data gathering done to inform this plan and the current baseline of digital equity in Indiana, see the Current State of Digital Equity section of this plan.

The digital equity dashboard features a preliminary list of 19 secondary data variables that have been identified to help local digital equity coalitions prioritize strategies and objectives as well as measure impact. The dashboard will showcase any movement in these variables over time at the county, regional, state and national levels. Please refer to the Current State of Digital Equity section of this plan for an overview of the state's current digital equity landscape as measured by these variables and the survey results.

Measurable objectives;

for documenting and promoting, among each Covered Population located in that State—

1. The availability of, and affordability of access to, fixed and wireless broadband technology;

    a) Indicator(s): Increase in broadband availability and affordability among covered populations, specifically low income and rural.

b) Metrics & Sources: % of households without internet access (ACS); paid home internet subscriptions by all covered populations (see survey data and context on page 23).

c) Baseline year: 2022; Short-term Year: 2026; Long-term year 2028

i. % of covered population Households no internet access:

Indiana does not currently have data on the percent of covered population households without no internet access and will seek to acquire this data as a near term goal.

ii. % Households internet access in rural areas:
Baseline: 14.6%
Short-term Goal: 9.8%
Long-term Goal: 5%

iii. % Households no internet access earning less than $35,000:
Baseline: 28%
Short-term Goal: 16.5%
Long-term Goal: 5%

iv. % Paid home internet for all 12 months:
Baseline: 81.6%
Short-term Goal: 88.3%
Long-term Goal: 95%

v. % of survey respondents that utilized paid home internet for all previous 12 months making less than $35,000:

Baseline: 65.5%
Short-term Goal: 80.25%
Long-term Goal: 95%

vi. % of survey respondents that utilized paid home internet for all previous 12 months age 60 or older:

Baseline: 85.7%
Short-term Goal: 90.35%
Long-term Goal: 95%

vii. % Households no internet access age 60 or older:
Baseline: TBD
Short-term Goal: 9.8%
Long-term Goal: 5%

viii. % Households no internet access with language barriers:
Baseline: TBD
Short-term Goal: 9.8%
Long-term Goal: 5%

ix. % Households no internet access that are a racial/ethnic minority:

Baseline: TBD
Short-term Goal: 9.8%
Long-term Goal: 5%

x. % of survey respondents that utilized paid home internet for all previous 12 months in rural areas:

Baseline: TBD
Short-term Goal: 89.5%
Long-term Goal: 95%

xi. % Paid home internet for all 12 months, veterans:

Baseline: 84%
Short-term Goal: 89.5%
Long-term Goal: 95%

xii. % of survey respondents utilizing paid home internet for all previous 12 months, disabled:

Baseline: 79.3%
Short-term Goal: 84.65%
Long-term Goal: 90%

xiii. % of survey respondents utilizing paid home internet for all previous 12 months, recently incarcerated:

Baseline: TBD
Short-term Goal: 84.65%
Long-term Goal: 90%

xiv. % of survey respondents utilizing paid home internet for all previous 12 months, racial/ethnic minorities:

Baseline: 86.4%
Short-term Goal: 90.7%
Long-term Goal: 95%

xv. % of survey respondents utilizing paid home internet for all previous 12 months, with language barriers:

Baseline: 89.5%
Short-term Goal: 92.25%
Long-term Goal: 95%

d) Key activities targeting all covered populations

i. Assess and educate interested parties in a community to help provide full coverage of the state with high-speed internet access

ii. Strengthen existing incentives and/or develop new programs for Internet Service Providers (ISP)

iii. Create and equip informed consumers to increase demand and encourage adoption

e) Barriers to be addressed among all covered populations:

i. Lack of home internet adoption among all covered populations, specifically low-income and rural

2. The online accessibility and inclusivity of public resources and services;

a) Indicator(s): Develop culturally, language, and ADA appropriate website content, specifically for government services, provide culturally and language appropriate technical support; increase number of all covered population users

b) Metrics & Sources: 90% of government service websites translated to Spanish (largest non-English speaking group in Indiana) and ADA compliant; number of culturally and language appropriate marketing campaigns of government services; government offices reporting availability of Spanish websites, ADA compliance, and marketing campaigns; share of all covered populations feeling very or extremely confident with accessing and applying for government services online (survey)

c) Baseline year: 2024; Short-term year: 2026; Long-term year 2028

i. % Government Website Services in Spanish:
Baseline: TBD
Short-term Goal: 85%
Long-term Goal: 95%

ii. No. of culturally and language appropriate marketing campaigns:
Baseline: TBD
Short-term Goal: 2
Long-term Goal: 3

iii. % Residents feeling very/extremely confident accessing/applying for government services:
Baseline: 63.7%
Short-term Goal: 69.35%
Long-term Goal: 75%

iv. % Residents (minorities) feeling very/extremely confident accessing/applying for government services:
Baseline: 61.1%
Short-term Goal: 68.05%
Long-term Goal: 75%

v. % Residents (any disability) feeling very/extremely confident accessing/applying for government services:
Baseline: 54.6%
Short-term Goal: 64.8%
Long-term Goal: 75%

vi. % Residents (age 60 or older) feeling very/extremely confident accessing/ applying for government services:
Baseline: 57.9%
Short-term Goal: 66.45%
Long-term Goal: 75%

d) Key activities targeting all covered populations:

i. Inventory government service websites to assess translation needs

ii. Translate government service websites

iii. Develop culturally and language appropriate marketing materials

iv. Equip residents to participate in the digital world safely and prosperously.

e) Barriers to be addressed among all covered populations:

i. Different levels of internet use among all covered populations

ii. Affordability of home internet

iii. Lack of trust on digital technologies

3. Digital literacy;

a) Indicator(s): Increase digital literacy levels of all covered populations

b) Metrics & Sources: number of culturally and language appropriate relevant curricula developed and taught (partners); number of partners delivering the curricula (partners); number of participants of all covered populations (partners), specifically those ages 60 or older

c) Baseline year: 2024; Short-term Year 2026; Long-term Year 2028

i. No. of culturally and language appropriate relevant curricula:
Baseline: TBD
Short-term Goal: 2
Long-term Goal: 3

ii. No. of partners:
Baseline: TBD
Short-term Goal: 3
Long-term Goal: 5

iii. No. of participants:
Baseline: TBD
Short-term Goal: 50
Long-term Goal: 100

d) Key activities targeting all covered populations:

i. Develop culturally and language appropriate curricula

ii. Invest in skilling up the workforce by identifying workers—specially those from covered populations—that would benefit from re-skilling, identifying companies willing to shift their culture to support the integration of digital skills through adult education programs

iii. Collaborate with local employers to incentivize digital skill programs by hosting on-site learning opportunities and investing in the offline training of their workers—specially those from covered populations.

iv. Support and fund the development and delivery of programs and resources

that build digital skills among small businesses—specially those from covered populations—and cultivate unique digital communities for Indiana towns/cities/counties

v. Leverage existing tech hubs/computer labs for digital skills classes and support existing educational programs

vi. Encourage and support programs connecting residents with local digital services, such as telehealth, online banking, or government/civic services, to cultivate prosperous online communities

vii. Support and fund digital skills classes to maximize the benefit of online activities in daily life (such as completing paperwork online, shopping, banking, locating information)

e) Barriers to be addressed among all covered populations

i. Infrequent internet use

ii. Low economic mobility due to inability to upskill or reskill

iii. Lower quality of life due to inability to benefit from online services for all covered populations

iv. Low literacy for all covered populations

4. Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual;

a) Indicator(s): Increase internet safety skills among all covered populations

b) Metrics & Sources: number of culturally and language appropriate internet safety curricula developed and taught (partners); number of partners delivering the curricula (partners); number of participants of all covered populations (partners), specifically those ages 60 or older

c) Baseline year: 2024; Short-term year: 2026; Long-term year: 2028

i. No. of culturally and language curricula:
Baseline: TBD
Short-term Goal: 2
Long-term Goal: 3

ii. No. of partners:
Baseline: TBD
Short-term Goal: 3
Long-term Goal: 5

iii. No. of participants:
Baseline: TBD
Short-term Goal: 50
Long-term Goal: 100

d) Key activities targeting all covered populations:

i. Build capacity to support one-to-one devices in schools and beyond (e.g., churches)

ii. Support and fund digital skills programs for parenting in the digital age, as well as a digital citizenship training program for adults to build their online social interaction skills

iii. Support and fund digital skills programs on online safety and privacy, specifically for covered populations

e) Barriers to be addressed among all covered populations:

i. Different levels of internet use among all covered populations

ii. Lack of trust on digital technologies among all covered populations

iii. Not being comfortable using digital technologies

iv. Non conducive mindset on using digital technologies for productive purposes

5. The availability and affordability of consumer devices and technical support for those devices.

a) Indicator(s): increase the availability of reliable and affordable devices for residents and households for all covered populations, specifically low-income.

b) Metrics & Sources: % households with no computing devices (ACS); ownership of laptops and desktops (survey)

c) Baseline year: 2022; Short-term year: 2026; Long-term year: 2028

i. % Households with no computing devices:
Baseline: 7.3%
Short-term Goal: 5.15%
Long-term Goal: 3%

ii. % Residents not owning a desktop:
Baseline: 43.5%
Short-term Goal: 36.75%
Long-term Goal: 30%

iii. % Residents (minorities) not owning a desktop:
Baseline: 37.3%
Short-term Goal:28.65%
Long-term Goal: 20%

iv. % Residents (making less than $35,000) not owning a desktop:
Baseline: 56.2%
Short-term Goal: 45.6%
Long-term Goal: 35%

v. % Residents (rural) not owning a desktop:
Baseline: 42%
Short-term Goal: 36%
Long-term Goal: 30%

vi. % Residents (disabled) not owning a desktop:
Baseline: 45%
Short-term Goal: 37.5%
Long-term Goal: 30%

vii. % Residents (language barrier) not owning a desktop:
Baseline: TBD
Short-term Goal: 37.5%
Long-term Goal: 30%

viii. % Residents (age 60 or older) not owning a desktop:
Baseline: 40.7%
Short-term Goal: 32.85%
Long-term Goal: 25%

ix. % Residents (recently incarcerated) not owning a desktop:
Baseline: TBD
Short-term Goal: 37.5%
Long-term Goal: 30%

x. % Residents (veterans) not owning a desktop:
Baseline: 42.1%
Short-term Goal: 36.05%
Long-term Goal: 30%

d) Key activities targeting all covered populations:

i. Expand availability of quality and reliable devices in the community relying on local device-related assets to educate and repurpose

ii. Develop educational and trusted technical assistance programs to maximize device adoption and use

e) Barriers to be addressed among all covered populations:

i. Low levels of desktop/laptop ownership

ii. Infrequent internet use due to unreliable devices

iii. Non conducive mindset on using digital technologies for productive purposes

An assessment of how the measurable objectives identified in item 2 of this Section IV.C.1.b.i will impact and interact with the State's—

1. Economic and workforce development goals, plans, and outcomes

a) The measurable objectives listed above will impact the state's economic and workforce development goals, plans, and outcomes in multiple ways. First, it will broaden the number of workers, by targeting all covered populations that may or may not be part of the workforce, with digital literacy as well as adequate devices

and internet safety. Second, it will help position the state as a leader in digital transformation and the digital economy by not only providing the skills, connectivity and devices needed but also contributing to digital equity. This aligns perfectly with the State's goal of becoming a technology powerhouse in the country.

2. Educational outcomes

   a) The measurable objectives listed above will impact the state's educational outcomes in multiple ways. First, it will target K-12 groups (covered populations) known to lag in digital skills to help them thrive in an increasingly digital world, but more importantly participate fully in digital-related school activities. This in turn will help with one of the state's objectives to increase the number of students attending and completing college. Second, for adult learners, this plan will broaden the workforce by not only adults upskilling and reskilling by including all covered populations but also by improving access to affordable connectivity, reliable devices, and digital literacy.

3. Health outcomes

   a) The measurable objectives listed above will impact the state's health outcomes by ensuring that all covered populations can take advantage of telehealth and telemedicine, including mental health. Reducing barriers these populations face around connectivity, devices, and skills, should equip them to benefit from increasingly digital health programs and resources. It will also allow residents to search for, gather, and use reliable and trustworthy health information. This will contribute to addressing health equity throughout the state.

4. Civic and social engagement

   a) The measurable objectives listed above will impact the state's civic and social engagement by ensuring that media literacy improves by allowing residents to engage meaningfully. Enhanced internet access enables residents from all covered populations to participate in online forums, community discussions, and virtual events, fostering civic engagement. Affordable broadband access can facilitate communication and collaboration among community members, leading to the formation of social networks and grassroots initiatives. Improved online accessibility and inclusivity of public resources and services ensure that all residents from all covered populations can engage with government initiatives and civic activities regardless of background or ability. Accessible online platforms enable broader participation in public forums, voting processes, and community decision-making, further enhancing civic engagement. Inclusive online services promote diversity and representation, empowering marginalized groups to voice their opinions and advocate for their needs within the community. Increased digital literacy fosters informed civic engagement by enabling residents to critically evaluate online information, participate in discussions, and advocate for social causes. Digital literacy empowers individuals to utilize online tools for community organizing, activism, and civic education, strengthening social cohesion. Awareness of online privacy and cybersecurity measures promotes trust and confidence in online interactions, encouraging residents to engage more actively in digital spaces. Affordable access to consumer devices and technologies enables more residents to participate in online civic activities, such as virtual town halls, community meetings,

and online petitions. In summary, these objectives are critical in shaping civic and social engagement in Indiana by promoting digital access, inclusion, literacy, privacy, and cybersecurity. By addressing barriers to digital participation and fostering a more equitable online environment, these objectives can promote community dialogue and empower residents to engage actively in civic life.

5. Delivery of other essential services.

   a) The measurable objectives listed above will impact the state's delivery of other essential services in that residents and communities can, for example, better prepare for natural disasters, improve communication within and outside the community, and identify emerging issues and address them, in part through digital resources.

An explanation of how the implementation strategy addresses gaps in existing state, local, and private efforts to address the barriers identified pursuant to Section IV.C.1.b.i, item 1, of this NOFO.

This implementation strategy, as outlined above, will help address existing gaps in state, local, and private efforts to ensure digital equity is a reality in the state of Indiana by tackling directly the barriers identified. This implementation, which relies primarily on local coalitions coordinated regionally and statewide, will empower communities and secure buy-in. This in turn will make any digital equity efforts sustainable. Because of this robust approach, where all covered populations are targeted across multiple areas (e.g., economic development, education, health) and programs (e.g., connectivity, devices, skills), an empowered local planning and implementation mechanism is warranted.

To be disclosed metrics (TBD) will be gathered by the Indiana Broadband Office through further assessments, surveys, and continued stakeholder engagement.

The measurable objectives discussed in the previous section do not happen in a vacuum. The digital equity work conducted to implement this plan will have an impact on the state goals, plans and outcomes, as well as other organizations. At the time of writing this plan, the following impacts on economic and workforce development, education, health, civic and social engagement, and the delivery of other essential services are anticipated:

Economic and workforce development goals, plans, and outcomes

The measurable objectives listed above will impact the state's economic and workforce development goals, plans, and outcomes in multiple ways. First, it will broaden the number of workers, by targeting all covered populations that may or may not be part of the workforce, with digital literacy as well as adequate devices and internet safety. Second, it will help position the state as a leader in digital transformation and the digital economy by not only providing the skills, connectivity and devices needed but also contributing to digital equity. This aligns perfectly with the State's goal of becoming a technology powerhouse in the country.

Educational outcomes

The measurable objectives listed above will impact the state's educational outcomes in multiple ways. First, it will target K-12 groups (all covered populations) known to lag in digital skills to help them thrive in an increasingly digital world, but more importantly

participate fully in digital-related school activities. This in turn will help with one of the state's objectives to increase the number of students attending and completing college. Second, for adult learners, this plan will broaden the workforce by not only adults upskilling and reskilling by including all covered populations but also by improving access to affordable connectivity, reliable devices, and digital literacy.

Health outcomes

The measurable objectives listed above will impact the state's health outcomes by ensuring that all covered populations can take advantage of telehealth and telemedicine, including mental health. Reducing barriers these populations face around connectivity, devices, and skills, should equip them to benefit from increasingly digital health resources. It will also allow residents to search for, gather, and use reliable and trustworthy health information. This will contribute to addressing health equity throughout the state.

Civic and social engagement

The measurable objectives listed above will impact the state's civic and social engagement by ensuring that media literacy improves by allowing residents to engage meaningfully. Enhanced internet access enables residents from all covered populations to participate in online forums, community discussions, and virtual events, fostering civic engagement. Affordable broadband access can facilitate communication and collaboration among community members, leading to the formation of social networks and grassroots initiatives. Improved online accessibility and inclusivity of public resources and services ensure that all residents from all covered populations can engage with government initiatives and civic activities regardless of background or ability. Accessible online platforms enable broader participation in public forums, voting processes, and community decision-making, further enhancing civic engagement. Inclusive online services promote diversity and representation, empowering marginalized groups to voice their opinions and advocate for their needs within the community. Increased digital literacy fosters informed civic engagement by enabling residents to critically evaluate online information, participate in discussions, and advocate for social causes. Digital literacy empowers individuals to utilize online tools for community organizing, activism, and civic education, strengthening social cohesion. Awareness of online privacy and cybersecurity measures promotes trust and confidence in online interactions, encouraging residents to engage more actively in digital spaces. Affordable access to consumer devices and technologies enables more residents to participate in online civic activities, such as virtual town halls, community meetings, and online petitions. In summary, these objectives are critical in shaping civic and social engagement in Indiana by promoting digital access, inclusion, literacy, privacy, and cybersecurity. By addressing barriers to digital participation and fostering a more equitable online environment, these objectives can promote community dialogue and empower residents to engage actively in civic life.

Delivery of other essential services.

The measurable objectives listed above will impact the state's delivery of other essential services in that residents and communities can, for example, better prepare for natural disasters, improve communication within and outside the community, and identify emerging issues and address them, in part through digital resources.

In addition, the implementation of the digital equity plan will interact with many organizations, agencies, and institutions. The following summaries reflect the thoughts of the Indiana digital equity task force's thoughts on how these existing plans and policies will interact with the state-wide digital equity plan, particularly for sectors relevant to the covered populations. To be disclosed metrics (TBD) will be gathered by the Indiana Broadband Office through further assessments, surveys, and continued stakeholder engagement.

Indiana's Family & Social Services Administration (FSSA) – Division of Aging

Indiana's Multi-Sector Plan on Aging (launched in 2019 and extended through 2024) outlines five goals under its mission to foster networks that provide information, access, and long-term care options that enhance choice, autonomy, and quality of life for Hoosiers. Services are coordinated and funded through Indiana's network of Area Agencies on Aging (AAAs) and include the state-funded Community and Home Options to Institutional Care for the Elderly and Disabled (CHOICE) program and administration of two Medicaid waiver programs providing Home and Community-Based Services (HCBS) for older adults and individuals of all ages with physical impairments.

Goal 5 of the FSSA's Multi-Sector Plan focuses on instituting policies and evidence-based programs to positively impact social determinants of health. This proposed Digital Equity Plan for the state of Indiana specifically addresses internet access, which is increasingly recognized as a "super determinant" of health. Internet access plays a role in health care outcomes and influences more traditionally recognized social determinants of health, such as education, employment, and healthcare access. Both digital access and digital adoption were considered in terms of how they relate to this covered population, referred to as "aging individuals".

Indiana Association of Regional Councils (IARC)

IARC supports regional development efforts that prioritize and categorize local community and economic development needs and projects based on urgency, feasibility and determined regional priority. As part of their regional purview, IARC has been involved in many of the digital inclusion and broadband planning efforts conducted at the county and community levels across the state of Indiana. Their voice as part of the Digital Equity Task Force helps ensure the plan's compliance with regional planning needs and interests.

One of the IARC regions that hosted a Digital Fellow recently received $5M in funding through their collaboration with internet service providers (ISPs) and is working to obtain another $10M for middle-mile, mainstream fiber, and other projects in the near future. They have focused on connecting their schools with the broadband network in response to the Covid-19 pandemic.

Indiana Department of Workforce Development (DWD)

The Indiana Department of Workforce Development (IDWD) is responsible for providing leadership, direction, and guidance to workforce partners to ensure programs offered through the workforce system are implemented and administered in alignment with state and federal guidelines and meet the business needs of Indiana employers.

As part of this oversight, the DWD provides the vision for Indiana's local Workforce Development Boards (WDB) to serve as strategic leaders and conveners of local workforce development system stakeholders. The local WDB partners with employers and the workforce development system to develop policies and investments that support public workforce system strategies. These strategies support regional economies, the development of effective approaches, local and regional sector partnerships, career pathways, and high-quality and customer-centered service delivery. WDBs are specifically considered and referred to under Strategy 3.4 of this proposed Digital Equity Plan.

The DWD is also responsible for administering federal Workforce Innovation & Opportunity Act (WIOA) funding in the state of Indiana to benefit adult education programs. In January 2024, the DWD will release a Request for Proposal (RFP) to interested Hoosier adult education providers for a competition grant that will span six (6) years from 2024-2030. While the RFP is not a strategic document, it does set the stage for how adult education providers address the digital literacy needs of Indiana's adult learners. The new grant competition sets out several objectives that align to those under Strategy 3.5 of this proposed Digital Equity Plan.

Indiana's State Service Plan (Serve Indiana)

Serve Indiana's State Service Plan (launched in 2019 and extended through 2024) created three priorities to advance service and volunteerism in Indiana: 1) strengthen Indiana AmeriCorps programs, 2) increase employer-based volunteer programs in Indiana, and 3) increase awareness of Serve Indiana in the broader community. As part of its first priority, Serve Indiana worked with the PCRD to fund a Digital Fellows Program, placing AmeriCorps volunteers in six of the IARC regions where they served (September 2021 to August 2023) as liaisons to build digital capacity at the county and community levels in these regions. The Digital Fellow program helped regions strategize the areas in which they needed to build added capacity. For some regions, this involved ensuring their community schools were connected. In another region, this meant supporting schools as they formed after school robotics programs. Two regions sought to enact their Digital Inclusion plans with the help of their Fellows; while another two sought to bolster the cybersecurity of their municipal governments, local institutions and key industries.

Indiana Rural Schools Association (excerpt from their policy)

The Indiana Small and Rural Schools believes all entities receiving any tax dollars for a digital build should share their fiber maps with the state. This will prevent taxpayer-supported fiber from being built on top of existing tax-supported fiber. The Indiana Small and Rural Schools also asks that taxpayer-supported broadband investments fund multiple ISP plans, including private and public partnerships that will serve the last mile in underserved areas.

Indiana Office of Equity, Inclusion, and Opportunity (policy & analysis)

When Governor Eric J. Holcomb shared his thoughts on how true equality and equity lead to opportunities for all, he committed that the state of Indiana would lead by example and take concrete steps to shape the change necessary to remove barriers to access and opportunity for all Hoosiers. One of those priorities was to create a public disparity data dashboard, providing Hoosiers the occasion to track the state's progress with closing equity gaps. Since that address, Indiana's Management Performance Hub, in partnership with the Office of the Chief Equity, Inclusion, & Opportunity Officer and various agencies across state government, created the state's Equity Data Portal. This dashboard encompasses a high-level view of equity related to health, public safety, social services, education and workforce.

The above-mentioned group of partners is also working to update the Equity Data Portal with even more metrics than are currently displayed. A very real possibility is that a dashboard could be created that visualizes digital equity using survey/partner/outcome data gathered by the Digital Equity Plan. While the state's work, propelled by these partners, is informed by many resources (in addition to the data presented in the portal), the ultimate goal is that people will use this portal as a gateway to open up conversations regarding Indiana's opportunities to provide the tools necessary for all Hoosiers to experience their best quality of life. Having reliable internet access (including access to this portal) is a critical component of that.

Indiana Department of Veterans Affairs

The Indiana Department of Veterans Affairs (IDVA) mission is to support, serve, and advocate for the Indiana Veteran Community. IDVA's work encompasses three main areas for Indiana Veterans, including: 1) veteran long-term care at the Indiana Veterans Home in West Lafayette, Ind., 2) the Indiana Veterans Cemetery in Madison, Ind., and 3) management of federal and state veterans' benefits.

Two of the three IDVA goals align directly with the digital access and equity priorities described in this plan. Specifically, IDVA has a goal to "increase awareness of Indiana veteran programs and benefits." Digital equity across the state will help IDVA achieve this goal. Secondly, IDVA has the goal to "improve and enhance customer satisfaction." Digital equity will provide Indiana veterans with better access to services overall, and it will allow IDVA to provide tools, information and resources when and where Hoosier veterans need them most.

United Way of Central Indiana

United Way of Central Indiana works alongside the human services nonprofit sector to design, support and grow systems that accelerate financial stability and upward mobility for individuals and families living in or near poverty and striving for a better future. Today and in the future, access to reliable high-speed internet is required to meet a household's basic needs, support the early care and learning for young children, and to find the economic empowerment that comes with a strong education and good job. United Way's digital equity agenda is committed to four areas of 1) expanding access, 2) providing high quality devices, 3) increasing digital literacy, and 4) offering navigation skills and advocacy for continued systems-level solutions. The organization is committed to helping build a

community where every household benefits from being connected online and any barriers that prevent our neighbors from safely engaging in online spaces are removed.

Indiana State Library

The Indiana State Library's mission encompasses "...leading and supporting the library community..." and defines one of their responsibilities as "strengthening services of all types of publicly and privately supported special, school, academic, and public libraries." The Indiana State Library's 2022-2027 Strategic Plan has relevant digital equity strategies associated with Goal 6: "Provide the support needed to help Indiana public libraries extend and provide 21st Century library services." The concept of a 21st century library aligns itself well with concepts from the state digital equity plan such as - digital resilience, equitable access to devices and connectivity, developing digital skills, digital accessibility, and community resource ecosystems. Two of the objectives from Goal 6 of the State Library's Strategic Plan are the most closely aligned. The first is about digital access: Provide up-to-date, reliable access to information to meet the needs of all Indiana residents by utilizing effective technology, telecommunications, and resources. The second more broadly encompasses the concept of digital equity: Provide training and resources to public libraries across the state that are specific to help bridge the digital equity gap.

Timeline

The proposed timeline below breaks down the major activities to be conducted. How this timeline is implemented will depend on the amount of funds received.

Plan Activities	2024			2025				2026				2027				2028			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Tailor processes to NOFO																			
Collaboration with Digital Equity Partners																			
Creation of Digital Equity Collaitions																			
Assess and educate interested parties in a community to help provide full coverage of the state with high-speed internet access																			
Strengthen existing incentives and/or develop new programs for Internet Service Providers (ISP)																			
Create and equip informed consumers to increase demand and encourage adoption																			
Measurable Objective 1 Milestone The following metrics achieved: i. 5% Households no internet access ii. 5% Households no internet access in rural areas iii. 15% Households no internet access earning less than $35,000 iv. 95% Paid home internet for all 12 months v. 35% Paid home internet for all 12 months making less than $35,000 vi. 95% Paid home internet for all 12 months age 60 or older																			
Inventory government service websites to assess translation needs																			

Plan Activities	2024			2025				2026				2027				2028			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Translate government service websites																			
Develop culturally and language appropriate marketing materials																			
Equip residents to participate in the digital world safely and prosperously																			
Measurable Objective 2 Milestone The following metrics achieved: i. 95% Government Website Services in Spanish ii. TBD No. of culturally and language appropriate marketing campaigns iii. 75% Residents feeling very/extremely confident accessing/ applying for government services iv. 75% Residents (minorities) feeling very/ extremely confident accessing/applying for government services v. 75% Residents (any disability) feeling very/ extremely confident accessing/applying for government services vi. 75% Residents (age 60 or older) feeling very/ extremely confident accessing/applying for government services																			
Develop culturally and language appropriate curricula																			
Invest in skilling up the workforce by identifying workers—specially those from covered populations—that would benefit from re-skilling, identifying companies willing to shift their culture to support the integration of digital skills through adult education programs																			

Plan Activities	2024			2025				2026				2027				2028			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Collaborate with local employers to incentivize digital skill programs by hosting on-site learning opportunities and investing in the offline training of their workers—specially those from covered populations.																			
Support and fund the development and delivery of programs and resources that build digital skills among small businesses—especially those from covered populations—and cultivate unique digital communities for Indiana towns/cities/counties																			
Leverage existing tech hubs/computer labs for digital skills classes and support existing educational programs																			
Encourage and support programs connecting residents with local digital services, such as telehealth, online banking, or government/ civic services, to cultivate prosperous online communities																			
Support and fund digital skills classes to maximize the benefit of online activities in daily life (such as completing paperwork online, shopping, banking, locating information)																			
Measurable Objective 3 Milestone The following metrics achieved: i. TBD No. of culturally and language appropriate relevant curricula ii. TBD No. of partners iii. TBD No. of participants																			
Build capacity to support one-to-one devices in schools and beyond (e.g., churches)																			

Plan Activities	2024			2025				2026				2027				2028			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Support and fund digital skills programs for parenting in the digital age, as well as a digital citizenship training program for adults to build their online social interaction skills																			
Support and fund digital skills programs on online safety and privacy, specifically for covered populations																			
Measurable Objective 4 Milestone The following metrics achieved: i. TBD No. of culturally and language curricula ii. TBD No. of partners iii. TBD No. of participants																			
Expand availability of quality and reliable devices in the community relying on local device-related assets to educate and repurpose																			
Develop educational and trusted technical assistance programs to maximize device adoption and use																			
Measurable Objective 5 Milestone The following metrics achieved: i. 3% Households with no computing devices ii. 30% Residents not owning a desktop iii. 20% Residents (minorities) not owning a desktop iv. 35% Residents (making less than $35,000) not owning a desktop v. 30% Residents (rural) not owning a desktop																			

Plan Activities	2024			2025				2026				2027				2028			
	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4	Q1	Q2	Q3	Q4
Digital Equity Data Gathering for Impact Evaluation			■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■	■
Digital Equity Dashboard Annual Update				■				■				■				■			
Repeat Survey																		■	■

APPENDIX

Appendix A - Glossary of Terms

Digital Equity*: the condition in which individuals and communities have the information technology capacity that is needed for full participation in the society and economy of the United States.

Digital Inclusion*: the activities that are necessary to ensure that all individuals in the United States have access to, and the use of, affordable information and communication technologies, such as—reliable fixed and wireless broadband internet service; internet-enabled devices that meet the needs of the user; and applications and online content designed to enable and encourage self-sufficiency, participation, and collaboration; and includes—obtaining access to digital literacy training; the provision of quality technical support; and obtaining basic awareness of measures to ensure online privacy and cybersecurity.

Digital Literacy*: the skills associated with using technology to enable users to find, evaluate, organize, create, and communicate information.

Aging Individual*: The term "aging individual" means an individual who is 60 years of age or older.

Community Anchor Institution*: The term "community anchor institution" means a public school, a public or multi-family housing authority, a library, a medical or healthcare provider, a community college or other institution of higher education, a State library agency, and any other nonprofit or governmental community support organization.

Covered Household*: The term "covered household" means a household, the income of which for the most recently completed year is not more than 150 percent of an amount equal to the poverty level, as determined by using criteria of poverty established by the Bureau of the Census.

Covered Populations*: The term "covered populations" means:

1. Individuals who live in covered households;
2. Aging individuals;
3. Incarcerated individuals, other than individuals who are incarcerated in a Federal correctional facility;
4. Veterans;
5. Individuals with disabilities;
6. Individuals with a language barrier, including individuals who—
   a. Are English learners; and
   b. Have low levels of literacy;
7. Individuals who are members of a racial or ethnic minority group; and
8. Individuals who primarily reside in a rural area.

Disability*: The term "disability" means, with respect to an individual—

1. A physical or mental impairment that substantially limits one or more major life activities of such individual;
2. A record of such an impairment; or
3. Being regarded as having such an impairment.

Rural Area*: The term "rural area" means any area other than –

1. A city or town that has a population of greater than 50,000 inhabitants;
2. Any urbanized area contiguous and adjacent to a city or town that has a population of greater than 50,000 inhabitants; and
3. In the case of a grant or direct loan, a city, town, or incorporated area that has a population of greater than 20,000 inhabitants.

Veteran*: The term "veteran" means a person who served in the active military, naval, air, or space service, and who was discharged or released therefrom under conditions other than dishonorable.

Infrastructure Investment and Jobs Act (IIJA): Presented with bipartisan support, this piece of legislation was signed into law by President Biden November 15, 2021 that included the Digital Equity Act of 2021 and established the funding for the development of this and other state plans, in addition to the State Digital Equity Capacity Grant Program, Digital Equity Competitive Grant Program and other programs focused on broadband deployment.

Digital Divide: The gap between individuals or communities who do not have and those who have the information technology capacity that is needed for full participation in the society and economy of the United States.

Digital Equity Coalition: Groups of community representatives dedicated to addressing digital equity within their community.

OCRA region: Strategic groupings of counties by the Indiana Office of Community and Rural Affairs (OCRA) for placing community liaisons and other assistance. Learn more about the six regions on the OCRA website here: https://www.in.gov/ocra/

Indiana Geographic Information Office (GIO): The Geographic Information System (GIS) community is governed by Indiana state statute that assigns responsibilities and duties to the Indiana Geographic Information Office (GIO). Learn more about these responsibilities here: https://www.in.gov/gis/indiana-gis-law/

The Purdue University Center for Regional Development (PCRD): Part of Purdue University's Office of Engagement, this center's mission is to be a leader in innovative and adaptive partnerships empowering regions to find solutions for equitable, sustainable, and resilient development. The Purdue Center for Regional Development will collaborate with people to listen, identify, and enhance assets unique to their story resulting in prosperity and quality of life. Learn more at https://pcrd.purdue.edu/

Indiana Broadband Office (IBO): A state office whose mission is to assist residents in need of affordable and reliable broadband connectivity. This mission of reaching Hoosiers where they live, work and play is accomplished by communicating with stakeholders, providing resources to a diverse audience and leveraging established relationships with elected officials, associations and providers. Learn more at: https://www.in.gov/indianabroadband/

Indiana Office of Community and Rural Affairs (OCRA): A state office that works with local, state and national partners to provide resources and technical assistance to aid communities in shaping and achieving their vision for community and economic development. Learn more at: https://www.in.gov/ocra/

**This plan uses these definitions as stated in the Notice of Funding Opportunity for the State Digital Equity Planning Grant Program*

Appendix B - Project Evaluation

Objective	Outputs	Outcomes
1.1.1	• Number of participating localities • Number of participating organizations • Number of assets inventoried • Number of participating localities with an above average share of covered populations • Number of participating organizations who who have a successful track record of serving or working with one or more covered populations	• Number of inventoried assets mobilized • Number of households impacted by mobilized assets • Number of Households impacted by mobilized assets in areas with above average covered populations • Number of households impacted by mobilized assets who identify as one or more covered populations • Number of Community Anchor Institutions impacted by mobilized assets who serve mostly covered populations. • Number of Community Anchor Institutions that serve mostly covered populations impacted by mobilized assets.
1.1.2	• Number of experts engaged in resource creation • Number of tools/resources in the toolkit • Number of covered populations experts/voices engaged in resource creation	• Number of municipal/county governments implementing toolkit • Number of municipal/county governments implementing the toolkit with an above average share of covered populations • Number of households with new or faster broadband service from use of the toolkit • Number of covered populations • households with new or faster broadband service from use of the toolkit

Objective	Outputs	Outcomes
1.1.3	• Number of participating partners utilizing the toolkit • Number of programs included • Number of provider resources leveraged • Number of participating partners who have a successful track record of serving or working with one or more covered populations utilizing the toolkit	• Number of individuals enrolled • Number of individuals who identify as one or more covered populations enrolled • Number of digital navigators providing assistance • Hours of digital navigators invested • Reach of marketing pieces • Number of eligible households enrolled in home subsidy programs • Number of eligible households who identify as one or more covered populations enrolled in home subsidy programs
1.1.4	• Number of community anchor institutions (CAI) identified • Number of CAI identified in areas with above average of covered populations	• Average connection speeds of all identified sites • Number of sites with new connection or increased speeds • Average connection speeds of sites in areas with above average covered populations • Average number of monthly users
1.1.5	• Number of resources assembled • Number of CAI's using the resources • Number of CAIs on the Indiana Digital Asset Map • Number of CAI's using the resources who have a successful track record of serving or working with one or more covered populations • Number of CAIs on the Indiana Digital Asset Map who have a successful track record of serving or working with one or more covered populations	• Number of CAIs recognized • Number of CAI's recognized that serve one or more covered population • Number of CAI's that report making changes to their network to increase safety and/or security • Number of CAI's who have a successful track record of serving or working with one or more covered populations that report making changes to their network to increase safety and/or security
1.1.6	• Number of data programs/resources started or supported • Amount of data collected • Number of data programs/resources started or supported that focus on covered populations	• Number of local leaders or organizations using the data • Decisions impacted by data from these programs • Number of local leaders or organizations serving areas with an above average share of covered populations using the data

Objective	Outputs	Outcomes
1.1.7	• Number of hotspot lending programs supported or launched • Number of hotspot lending programs included on the Indiana Digital Asset Map • Number of resources collected • Number of individuals accessing the best practices • Number of practitioners participating in network activities • Number of hotspot lending programs supported or launched in areas with an above average share of covered populations • Number of hotspot lending programs serving areas with an above average share of covered populations included on the Indiana Digital Asset Map	• Number of people using the launched or supported hotspot lending programs who identify as one or more covered populations • Share of people using the launched or supported hotspot lending programs that are part of one or more covered populations
1.1.8	• Number of connectivity programs supported targeted at one or more covered populations	• Number of students connected • Number of adult learners connected • Number of post-release justice-involved individuals connected • Number of individuals connected who identify as one or more covered populations
1.1.9	• Identified requirements/parameters for the awards program	• Number of nominated organizations • Number of organizations recognized • Impact from recognized organizations • Number of nominated organizations who have a successful track record of serving or working with one or more covered populations • Number of organizations recognizedwho have a successful track record of serving or working with one or more covered populations
1.2.1	• Number of Incentive programs developed • Areas that adopted the incentive programs • Population living in areas implementing incentive program(s) • Covered populations living in areas implementing incentive program(s)	• Network upgrades • Number of unserved Households reached • Number of unserved Households of covered population reached

Objective	Outputs	Outcomes
1.2.2	• Number of programs with expanded eligibility	• Number of consumers participating in one or more programs since eligibility was expanded • Number of consumers participating in one or more programs since eligibility was expanded who identify as one or more covered populations
1.2.3	• Amount of fees waived	• Number of unserved Households reached • Number of unserved Households of covered population reached • Network upgrades
1.2.4	• Number of regulations streamlined/ impacted	• Number of unserved Households reached • Number of unserved Households of covered population reached • Network upgrades
1.2.5	• Number of collaborations • Number of organizations/interested groups involved • Number ISPs involved • Number of organizations/interested groups involved who have a successful track record of serving or working with one or more covered populations	• Number of households enrolled in assistance programs • Number of households informed of assistance programs • Number of covered population households enrolled in assistance programs • Number of covered population households informed of assistance programs
1.2.6	• Number of resources created • Number of resources deployed • Number of organizations creating or deploying the resources	• Number of ISPs/potential ISPs using the resources • Number of ISPs created • Number of ISPs sustained • Number of ISPs created who are owned or operated by an individual who identifies as one or more covered populations • Number of ISPs sustained who are owned or operated by an individual who identifies as one or more covered populations • Number of households served by the new or sustained ISPs • Number of covered population households served by the new or sustained ISPs
1.2.7	• Number of reporting/evaluation tools created • Number of funding programs collaborated with	• Reach of published evaluation results

Objective	Outputs	Outcomes
1.2.8	• Incentive programs developed • Funding resources created	• Number of Communities leveraging incentive programs • Amount of funding reinvested through prioritized ISPs • Network expansions • Number of unserved Households reached • Number of unserved Households of covered population reached
1.2.9	• Number of facilitated opportunities • Number of ISPs engaged in the facilitated opportunities • Number of organizations/individuals engaged in facilitated opportunities • Number of organizations engaged in facilitated opportunities who have a successful track record of serving or working with one or more covered populations	• Number of strategies developed through facilitated opportunities • Number of strategies from the facilitated opportunities implemented • Number of strategies developed through facilitated opportunities targeted at one or more covered populations • Number of strategies from the facilitated opportunities implemented targeted at one or more covered populations
1.3.1	• Number of resources or programs developed • Number of educational opportunities conducted • Reach of educational materials • Number of individuals participating in educational opportunities • Number of partners using the resources or programs • Number of individuals participating in educational opportunities who identify as one or more covered populations • Number of partners using the resources or programs who have a successful track record of serving or working with one or more covered populations	• Knowledge gain reported by participating consumers • Knowledge gain reported by participating consumers who identify as one or more covered populations
1.3.2	• Available broadband captured in the Indiana Digital Asset map • Available broadband in areas with an above average share of covered populations captured in the Indiana Digital Asset map	• Number of users accessing the Indiana Digital Asset map • Number of organizations promoting the Indiana Digital Asset map • Number of organizations promoting the Indiana Digital Asset map who have a successful track record of serving or working with one or more covered populations

Objective	Outputs	Outcomes
1.3.3	• Development of reporting (systems) • Reach of promotion of reporting systems	• Number of individuals using the reporting system • Number of concerns reported • Number of covered population using the reporting system • Number of concerns addressed • Number of concerns reported in areas with an above average share of covered populations • Number of concerns addressed in areas with an above average share of covered populations
1.3.4	• Number of partnerships developed or supported • Number of partnerships developed or supported who have a successful track record of serving or working with one or more covered populations	• Number of households assisted with home internet set-up • Number of households who identify as one or more covered populations assisted with home internet set-up
2.1.1	• Number of device loan or giveaway programs launched or supported • Number of device loan or giveaway programs that offer peripheral devices • Number of device loan or giveaway programs that provide continual tech support • Number of device loan or giveaway programs launched or supported in areas with an above average share of covered populations • Number of device loan or giveaway programs that offer peripheral devices in areas with an above average share of covered populations • Number of device loan or giveaway programs that provide continual tech support in areas with an above average share of covered populations	• Number of households provided/ supplied with a device • Number of households of covered populations supplied with a device • Number of peripheral devices supplied
2.1.2	• Number of resources collected • Number of resources published • Number of practitioners participating in network activities • Number of organizations who have a successful track record of serving or working with one or more covered populations participating in network activities	• Number of users accessing published best practices • Number of practitioners reporting changes to programs based on best practice resources or network participation • Number of resources contributed to the best practices from the practitioner network • Number of programs who have a successful track record of serving or working with one or more covered populations using the resources

Objective	Outputs	Outcomes
2.1.3	• Strategies identified for sustaining or subsidizing device give away programs • Strategies identified for offsetting cost of device recycling/refurbishing programs • Number of subsidized/sustainable device giveaway programs • Number of device recycling/ refurbishing programs • Number of subsidized/sustainable device giveaway programs in areas with an above average share of covered populations • Number of device recycling/ refurbishing programs in areas with an above average share of covered populations	• Number of devices given away through sustained/subsidized device giveaway programs • Number of households, organizations or businesses donating used devices • Number of devices recycled/ refurbished • Proximity of device giveaway programs to covered populations • Distribution of device recycling/ refurbishing programs around the state • Number of devices given away through sustained/subsidized device giveaway programs to individuals who identify as one or more covered populations
2.1.4	• Capacity built • Number of one-to-one device programs supported • Number of one-to-one programs supported outside of schools • Number of one-to-one programs supported in areas with above average covered populations	• Number of one-to-one programs serving above average shares of covered populations • Number of individuals with devices through one-to-one programs • Number of individuals with a device through one-to-one programs who are a part of one or more covered populations

Objective	Outputs	Outcomes
2.1.5	• Number of designated community tech hubs • Number of community tech hubs created • Number of pre-existing or new community tech hubs located in areas with an above average share of covered populations • Number of community tech hubs providing technical assistance • Number of community tech hubs providing digital literacy workshops • Number of best practice resources collected • Number of best practice resources published • Number of practitioners participating in network activities • Number of designated community tech hubs in areas with an above average share of covered populations • Number of community tech hubs created in areas with an above average share of covered populations • Number of community tech hubs providing technical assistance in areas with an above average share of covered populations • Number of community tech hubs providing digital literacy workshops in areas with an above average share of covered populations	• Number of devices provided through community tech hubs • Hours of technical support proved by workers or volunteers at community tech hubs • Number of individuals using community tech hubs on a weekly or month biases • Number of individuals using devices at community tech hubs • Number of individuals attending digital literacy workshops at community tech hubs • Knowledge gain reported by attendees of digital literacy workshops at community tech hubs • Number of users accessing best practice resources • Number of practitioners reporting changes to programs or practices based on best practice resources • Number of resources contributed to the best practices by practitioner network participants • Number of devices provided through community tech hubs in areas with an above average share of covered populations • Hours of technical support proved by workers or volunteers at community tech hubs in areas with an above average share of covered populations • Number of individuals who identify as one or more covered populations using community tech hubs on a weekly or month biases • Number of individuals who identify as one or more covered populations using devices at community tech hubs • Number of individuals who identify as one or more covered populations attending digital literacy workshops at community tech hubs

Objective	Outputs	Outcomes
2.1.6	• Number of device refurbishing skills programs developed or supported • Number of device refurbishing skills programs delivered • Number of device refurbishing skills programs developed or supported in areas with an above average share of covered populations • Number of device refurbishing skills programs delivered in areas with an above average share of covered populations	• Number of participants completing device refurbishing skills programs • Number of devices refurbished through device refurbishing skills programs • Number of devices kept by participants of device refurbishing skills programs • Number of participants completing device refurbishing skills programs who identify as one or more covered populations • Number of devices kept by participants of device refurbishing skills programs who identify as one or more covered populations
2.1.7	• Number of incentive programs developed • Number of incentive programs adopted • Number of incentive programs adopted in areas with an above average share of covered populations	• Number of businesses, organizations or individuals donating devices • Number of devices refurbished • Number of refurbished devices distributed to areas with an above average share of covered populations.
2.1.8	• Number of computer labs or tech hubs in the directory • Number of device lending/giveaway programs in the directory • Number of computer labs or tech hubs in areas with an above average share of covered populations in the directory • Number of device lending/giveaway programs in areas with an above average share of covered populations in the directory	• Number of monthly users of the directory • Number of monthly users looking at computer labs/tech hubs in the directory • Number of monthly users looking at device lending/giveaway programs in the directory • Number of monthly users looking at computer labs/tech hubs in areas with an above average share of covered populations in the directory in the directory • Number of monthly users looking at device lending/giveaway programs in areas with an above average share of covered populations in the directory
2.1.9	• Number of device lending programs offering assistive technology • Number of device lending programs offering assistive technology in areas with an above average share of covered populations	• Number of individuals using assistive technology through lending programs • Number of individuals using assistive technology through lending programs who identify as one or more covered populations

Objective	Outputs	Outcomes
2.2.1	• Number of programs supported or funded • Number of programs supported or funded in areas with an above average share of covered populations	• Number of individuals participating in educational programs • Number of individuals reached through educational campaigns • Number of individuals participating in educational programs who identify as one or more covered populations • Number of individuals reached through educational campaigns in areas with an above average share of covered populations
2.2.2	• Number of digital literacy programs developed • Number of digital literacy programs supported • Number of digital literacy programs supported in areas with an above average share of covered populations	• Number of participants who completed the digital literacy program • Knowledge gain reported by participants • Number of participants who completed the digital literacy program who identify as one or more covered populations • Knowledge gain reported by participants who identify as one or more covered populations
2.2.3	• Number of schools engaged or supported • Capacity built	• Number of students accessing the assistive technology they need • Number of students receiving the resources they need
2.2.4	• Number of educational resources or programs supported • Number of educational resources or programs supported in areas with an above average share of covered populations	• Number of individuals reached • Number of participants in educational programs • Number of users accessing resources • Knowledge gain reported by program participants • Number of individuals reached who identify as one or more covered populations • Number of participants in educational programs who identify as one or more covered populations • Knowledge gain reported by program participants who identify as one or more covered populations

Objective	Outputs	Outcomes
2.2.5	• Number of tech hubs or computer labs hosting digital skills classes • Number of programs conducted • Number of tech hubs or computer labs hosting digital skills classes in areas with an above average share of covered populations • Number of programs conducted in areas with an above average share of covered populations	• Number of individuals participating in classes/programs • Knowledge gain reported by program participants • Number of individuals participating in classes/programs who identify as one or more covered populations • Knowledge gain reported by program participants who identify as one or more covered populations
3.1.1	• Number of digital equity (or similar) coalitions formed • Percent of state (by area or population) served by a digital equity coalition • Number of digital equity (or similar) coalitions formed in areas with an above average share of covered populations • Percent of areas (by area or population) with an above average share of covered populations served by a digital equity coalition • Number of individuals who identify as one or more covered populations participating on a digital equity coalition • Number of organizations who have a successful track record of serving or working with one or more covered populations involved in a digital equity coalition	• Number of digital equity coalitions or coalition members actively participating in state digital equity coalition networking/events • Number of programs implemented by digital equity coalitions • Number of programs implemented by digital equity coalitions in areas with an above average share of covered populations
3.1.2	• Number of stories gathered • Number of individuals, organizations, or businesses interviewed • Number of stories gathered of individuals or groups who identify as one or more covered populations • Number of individuals, organizations, or businesses interviewed who identify as one or more covered populations	• Number of storytelling campaigns launched • Number of individuals reached through storytelling campaigns • Number of individuals reached through storytelling campaigns in areas with an above average share of covered populations

Objective	Outputs	Outcomes

3.1.3	• Development of a recognition program(s) including:
	  ° Number of areas of recognition
	  ° Criteria developed for awardees
		• Number of individuals and/ or organizations engaged in the recognition program(s)
		• Number of individuals and/or organizations recognized
		• Number of individuals impacted by recognized partners
		• Impact stories collected from recognized partners
		• Number of individuals and/ or organizations engaged in the recognition program(s) who identify as one or more covered populations
		• Number of individuals and/or organizations recognized who identify as one or more covered populations or have a successful track record of serving or working with one or more covered populations
		• Number of individuals who identify as one or more covered populations impacted by recognized partners

3.1.4	• Number of digital equity coalitions or similar groups engaged in the state-wide network • Number of individuals involved in digital equity coalitions engaged in the state-wide network • Percent of state (by area or population) served by digital equity coalitions engaged in the state-wide network • Number of best practice and/or resources sharing events hosted for the statewide network of digital equity coalitions • Number of resources and/or best practices published in an online repository for network use • Number of digital equity coalitions or similar groups engaged in the state-wide network that serve areas with an above average share of covered populations • Number of individuals involved in digital equity coalitions engaged in the state-wide network who identify as one or more covered populations • Percent of covered populations • (by population or area with an above average share) served by digital equity coalitions engaged in the state-wide network	• Number of resources accumulated through the state-wide network of digital equity coalitions • Number of digital equity coalitions reporting using the resources gathered • Number of website visitors to the online repository of resources and/or best practices • Number of first-time users accessing the online repository of resources and/ or best practices • Number of returning users accessing the online repository of resources and/ or best practices • Average time spent by users spent on the online repository of resources and/ or best practices. • Number of digital equity coalitions reporting using the resources gathered that serve areas with an above average share of covered populations

Objective	Outputs	Outcomes
3.1.5	• Number of educational events or consultations on digital equity conducted with community partners • Number of community partners contacted about digital equity • Number of digital equity awareness and/or educational campaigns conducted • Reach of digital equity awareness and/or educational campaigns conducted • Engagement for digital equity awareness and/or educational campaigns conducted • Number of educational events or consultations on digital equity conducted with community partners in areas with an above average share of covered populations or who have a successful track record of serving or working with one or more covered populations • Number of community partners in areas with an above average share of covered populations or who have a successful track record of serving or working with one or more covered populations contacted about digital equity	• Number of Community Partners offering grants or other funding opportunities for digital equity efforts • Total dollars invested in digital equity initiatives by community partners • Number of digital equity coalitions receiving funding from community partners • Number of community partners providing funding to digital equity coalitions • Total dollars leveraged by digital equity coalitions from community partners • Number of programs implemented through funding from community partners • Number of resources developed through funding from community partners • Number of individuals participating in programs and using resources implemented through funding from community partners • Number of Community Partners offering grants or other funding opportunities for digital equity efforts in areas with an above average share of covered populations • Total dollars invested in digital equity initiatives in areas with an above average share of covered populations by community partners • Number of digital equity coalitions who serve areas with an above average share of covered populations receiving funding from community partners • Number of community partners providing funding to digital equity coalitions who serve areas with an above average share of covered populations • Total dollars leveraged by digital equity coalitions who serve areas with an above average share of covered populations from community partners

Objective	Outputs	Outcomes
		• Number of programs implemented in areas with an above average share of covered populations through funding from community partners • Number of individuals who identify as one or more covered populations participating in programs and using resources implemented through funding from community partners
3.1.6	• Number of educational materials developed • Names of Recognition/rewards provided and their criteria	• Number of local leaders participating in educational opportunities • Number of locations (city, county, region, etc) with leaders participating in educational opportunities • Number of local leaders participating in educational opportunities who serve areas with an above average share of covered populations • Percent of covered populations (by population or area with an above average share) with leaders participating in educational opportunities

Objective	Outputs	Outcomes
3.1.7	• Number of hours of technical assistance provided to digital equity coalitions on creating digital equity plans • Number of resources and/or programs developed to support digital equity coalitions in creating digital equity plans • Number of digital equity plans that connect to or support the state wide digital equity plan • Number of hours of technical assistance provided to digital equity coalitions that serve areas with an above average share of covered populations on creating digital equity plans • Number of digital equity plans that connect to or support the state wide digital equity plan that serve areas with an above average share of covered populations	• Number of digital equity plans developed by digital equity coalitions • Percent of state (by population or area) covered by a local or regional digital equity plan • Number of initiatives implemented from local/regional digital equity plans • Number of joint initiatives implemented to fulfill local/regional digital equity plans and the state-wide digital equity plan • Number of collaborations pursued between state-wide and local/regional digital equity coalitions. • Number of digital equity plans developed by digital equity coalitions that serve areas with an above average share of covered populations • Percent of covered populations (by population or area with an above average share) covered by a local or regional digital equity plan • Number of initiatives implemented from local/regional digital equity plans that serve areas with an above average share of covered populations • Number of joint initiatives implemented to fulfill local/regional digital equity plans and the state-wide digital equity plan aimed at one or more covered populations
3.1.8	• Number of organizations serving covered populations identified • Number of initiatives funded • Number of dollars used to fund digital equity initiatives for covered populations delivered by or in collaboration with partner organizations	• Number of covered-population individuals participating in programs provided by partner organizations through provided funding • Number of cover-population individuals using resources developed by partner organizations through provided funding • Unique digital equity needs being addressed by partner organizations through provided funding • Adjustments to the Digital equity plan or implementations based on feedback from covered population provided through partner organizations

Objective	Outputs	Outcomes
3.2.1	• Number of college websites published in the online repository as part of the recommended whitelist • Number of employment websites published in the online repository as part of the recommended whitelist • Number of community resource websites published in the online repository as part of the recommended whitelist • Number of community resource websites from organizations who have a successful track record of serving or working with one or more covered populations published in the online repository as part of the recommended whitelist	• Number of institutions using the recommended whitelist on devices in their device give away or loan program • Number of website visitors viewing the recommended whitelist • Number of returning website visitors viewing the recommended whitelist • Number of institutions who have a successful track record of serving or working with one or more covered populations using the recommended whitelist on devices in their device give away or loan program
3.2.2	• Number of needs identified • Number of guidelines developed • Number of guidelines developed to increase accessibility for specific covered populations • Number of resources developed • Number of technical assistance programs developed • Number of technical assistance hours invested • Number of government or civic organizations utilizing the guidelines • Number of government or civic organizations utilizing using the technical assistance	• Number of government or civic service websites that meet the established guidelines • Number of government or civic service websites that exceed the established guidelines • Increase in website visitors to participating government or civic service websites • Increase in time users spend on participating government or civic service websites

3.2.3	• Development of a recognition program(s) including:
	  ° Number of areas of recognition
	  ° Criteria developed for awardees
	• Number of Indiana-based websites or web services nominated
	• Number of Indiana-based websites or web services recognized
	• Number of Awareness campaigns about the recognition program and/or recipients implemented
	• Reach of awareness campaign
	• Engagement with the awareness campaign
		• Number of Indiana residents served by recognized Indiana-base websites or web services
		• Number of Indiana residents who identify as one or more covered populations served by recognized Indiana-base websites or web services

Objective	Outputs	Outcomes
3.2.4	• Number of awareness campaigns implemented • Number of programs connecting community residents with local digital services conducted • Number of resources connecting community residents with local digital services launched • Number of local digital services participating in awareness campaigns • Number of local digital services participating in programs connecting community residents with local digital services • Number of local digital services participating in resources connecting community residents with local digital services • Number of awareness campaigns implemented in areas with an above average share of covered populations • Number of programs connecting community residents with local digital services conducted in areas with an above average share of covered populations • Number of local digital services participating in awareness campaigns in areas with an above average share of covered populations • Number of local digital services participating in programs connecting community residents with local digital services in areas with an above average share of covered populations • Number of local digital services participating in resources connecting community residents with local digital services in areas with an above average share of covered populations	• Number of community residents connected with digital services • Number of community residents reporting an increase in use of local digital services • Number of local digital services reporting an increase in users • Number of community residents reporting positive benefits from using local digital services • Number of community residents who identify as one or more covered populations connected with digital services • Number of community residents who identify as one or more covered populations reporting an increase in use of local digital services • Number of local digital services reporting an increase in users in areas with an above average share of covered populations • Number of community residents who identify as one or more covered populations reporting positive benefits from using local digital services

Objective	Outputs	Outcomes
3.2.5	• Identify partners actively working to protect children in the digital age • Number of meetings or consultations conducted with partners • Identify partners actively working to protect children in the digital age who have a successful track record of serving or working with one or more covered populations • Number of meetings or consultations conducted with partners who have a successful track record of serving or working with one or more covered populations	• Number of programs identified • Number of policies identified • Number of programs implemented • Number of policies implemented • Number of children impacted • Number of children impacted who identify as one or more covered populations
3.2.6	• Number of digital equity recommendations developed • Number of disaster education, response or recovery experts consulted • Number of digital equity experts consulted • Number of digital equity recommendations published • Number of resources or programs developed to help integrate digital equity recommendations into continuity of operations plans	• Number of local continuity of operations plans incorporating digital equity recommendations • Percent of the state (by area or population) covered by a local continuity of operations plan that includes digital equity recommendations • Number of disasters that leveraged a continuity of operations plan that incorporated digital equity recommendations • Number of individuals impacted by one or more disasters whose community leveraged a continuity of operations plan that incorporated digital equity recommendations • Number of individuals who identify as one or more covered populations impacted by one or more disasters whose community leveraged a continuity of operations plan that incorporated digital equity recommendations • Number of individuals using programs or resources to understand and integrate digital equity recommendations into continuity of operations plans • Number of areas with above average share of covered populations with a continuity of operations plan that integrates digital equity recommendations

Objective	Outputs	Outcomes
3.2.7	• Number of healthcare deserts identified • Number of programs funded • Amount of funding invested in programs • Number of organizations partnered with • Number of telehealth providers partnered with • Number of healthcare deserts identified in areas with an above average share of covered populations • Number of organizations partnered with who have a successful track record of serving or working with one or more covered populations	• Number of individuals participating in the program • Number of program participants reporting savings from telehealth use • Number of program participants who report an increase in healthcare services or quality • Number of program participants who identify as one or more covered populations • Number of program participants who identify as one or more covered populations reporting savings from telehealth use • Number of program participants who identify as one or more covered populations who report an increase in healthcare services or quality
3.2.8	• Number of programs developed to increase digital civic engagement • Number of resources developed to improve or increase digital civic engagement • Number of technical assistance hours invested in improving or increasing digital civic engagement • Number of digital civic engagement best practices collected and published/ shared • Number of programs developed to increase digital civic engagement in areas with an above average share of covered populations • Number of resources developed to improve or increase digital civic engagement in areas with an above average share of covered populations • Number of technical assistance hours invested in improving or increasing digital civic engagement in areas with an above average share of covered populations	• Number of local leaders participating in programs to increase digital civic engagement • Number of individuals participating in programs to increase digital civic engagement • Number of local leaders utilizing resources to increase digital civic engagement • Number of individuals utilizing resources to increase digital civic engagement • Number of local leaders participating in programs to increase digital civic engagement in areas with an above average share of covered populations • Number of individuals participating in programs to increase digital civic engagement in areas with an above average share of covered populations • Number of local leaders utilizing resources to increase digital civic engagement in areas with an above average share of covered populations • Number of individuals utilizing resources to increase digital civic engagement in areas with an above average share of covered populations

Objective	Outputs	Outcomes
3.3.1	• Number of educational materials developed • Number of educational programs conducted	• Number of leaders participating in educational programs • Number of leaders reporting a knowledge gain from the educational programming • Number of counties or cities with a leader that has participated in the educational programing • Number of policies or programs resulting from education provided • Number of leaders participating in educational programs who serve areas with an above average share of covered populations • Number of leaders reporting a knowledge gain from the educational programming who serve areas with an above average share of covered populations • Number of counties or cities with an above average share of covered populations with a leader that has participated in the educational programing • Number of policies or programs in areas with an above average share of covered populations resulting from education provided
3.3.2	• Number of resources developed to help local officials leverage broadband infrastructure for workforce attraction	• Number of local leaders using the resources • Number of counties/cities using the resources • Number of local leaders using the resources in areas with an above average share of covered populations • Number of counties/cities with an above average share of covered populations using the resources

Objective	Outputs	Outcomes
3.3.3	• Number digital ag programs developed • Number of digital ag resources developed • Number of digital ag experts consulted	• Number of farmers participating in digital ag programs • Number of local leaders participating in digital ag programs • Number of farmers reporting adopting digital ag practices because of programing or resources • Profit increases reported by farmers who adopted digital ag practices • Crop yield increases reported by farmers who adopted digital ag practices • Number of farmers participating in digital ag programs who identify as one or more covered populations • Number of local leaders participating in digital ag programs who serve areas with an above average share of covered populations • Number of farmers reporting adopting digital ag practices because of programing or resources who identify as one or more covered populations • Profit increases reported by farmers who identify as one or more covered populations who adopted digital ag practices • Crop yield increases reported by farmers who adopted digital ag practices who identify as one or more covered populations
3.3.4	• Number of reskilling programs developed • Number of workers targeted • Number of companies that participate in workforce reskilling programs • Number of adult education programs integrating digital skills • Number of companies that participate in workforce reskilling programs in areas with an above average share of covered populations • Number of adult education programs integrating digital skills in areas with an above average share of covered populations	• Number of workers completing reskilling programs • Number of workers employed in new jobs following reskilling program completion • Number of graduates of adult education programs reporting an increase in digital skills • Number of workers completing reskilling programs who identify as one or more covered populations • Number of workers employed in new jobs following reskilling program completion who identify as one or more covered populations • Number of graduates of adult education programs reporting an increase in digital skills who identify as one or more covered populations

Objective	Outputs	Outcomes
3.3.5	• Number of digital skills programs incentivized • Number of employers contributing incentives • Number of digital skills programs located in areas with an above average share of covered populations • Number of employers providing incentives for digital skills programs who are located in areas with an above average share of covered populations • Number of offline trainings offered • Number of offline trainings offered in areas with an above average share of covered populations	• Number of workers who completed digital skills programs • Number of on-site learning opportunities hosted • Number of offline trainings completed • Number of employers reporting an increase in productivity following digital skills programming • Number of workers reporting raises or other benefits as a result of completing digital skills programming • Number of workers who completed digital skills programs who identify as one or more covered populations • Number of on-site learning opportunities hosted in areas with an above average share of covered populations • Number of workers reporting raises or other benefits as a result of completing digital skills programming who identify as one or more covered populations
3.3.6	• Number of incentive programs developed • Number of cities or counties adopting incentive programs • Number of cities or counties with an above average share of covered populations adopting incentive programs	• Number of employers who develop remote work programs • Number of new workers employed by incentivized employers • Number of new residents in cities or counties employed in remote work
3.3.7	• Number of high school classes developed • Number of high school classes receiving support from local employers • Number of employers involved in the development or support of high school classes • Number of high school classes developed in areas with an above average share of covered populations • Number of high school classes receiving support from local employers in areas with an above average share of covered populations	• Number of students showing a knowledge gain from the classes • Number of students demonstrating proficiency in employable digital skills • Number of students who secure jobs with local employers following course completion • Number of students who identify as one or more covered populations showing a knowledge gain from the classes • Number of students who identify as one or more covered populations demonstrating proficiency in employable digital skills • Number of students who identify as one or more covered populations who secure jobs with local employers following course completion

Objective	Outputs	Outcomes
3.3.8	• Number of incentive programs developed • Number of cities or counties adopting the incentive program • Number of employers utilizing the incentive program • Number of cities or counties with an above average share of covered populations adopting the incentive program • Number of employers utilizing the incentive program in areas with an above average share of covered populations	• Number of employees receiving home internet benefits from participating employers • Number of employees with an employer-provided device at home from participating employers • Number of participants who report the employer-provided device as the only device in the household • Number of participants who report not having had home internet before the benefit from participating employers. • Number of employees who identify as one or more covered populations receiving home internet benefits from participating employers • Number of employees with an employer-provided device at home from participating employers • Number of participants who identify as one or more covered populations who report the employer-provided device as the only device in the household • Number of participants who identify as one or more covered populations who report not having had home internet before the benefit from participating employers.
3.3.9	• Number of partners identified as already working with amish populations • Number of contacts established within amish populations • Number of programs developed • Number of resources developed	• Number of individuals participating in the developed programs • Number of individuals using the developed resources • Number of individuals who received the resources
3.3.10	• Number of resources developed for the toolkit • Number of experts consulted • Number of hours of technical assistance provided to help implement the toolkit • Number of hours of technical assistance provided in areas with an above average share of covered populations to help implement the toolkit	• Number of LEDOs/Economic Development Corporations using the toolkit • Percent of counties using the toolkit • Number of economic development plans impacted by the toolkit • Number of LEDOs/Economic Development Corporations in areas with an above average share of covered populations using the toolkit • Number of economic development plans in areas with an above average share of covered populations impacted by the toolkit

Objective	Outputs	Outcomes
3.3.11	• Number of dollars invested in the revolving loan fund • Number of businesses who apply to use the revolving loan fund • Number of businesses who received funds from the revolving loan fund • Number of businesses owned or operated by an individual who identify as one or more covered populations who received funds from the revolving loan fund	• Percent increase in sales reported by businesses who received loans • Number of jobs created following the use of loan funds • Percent increase in sales reported by businesses who received loans that are owned or operated by an individual who identify as one or more covered populations
3.3.12	• Number of programs developed • Number of programs funded • Number of businesses who participated in programs • Number of towns/cities/counties that participated in programs • Number of individuals who participated in programs • Number of businesses owned or operated by an individual who identify as one or more covered populations who participated in programs • Number of towns/cities/counties with an above average share of covered populations that participated in programs • Number of individuals who identify as one or more covered populations who participated in programs	• Number of small businesses that report an increase in digital skills • Number of businesses that report an increase in sales following digital skills classes • Number of businesses that report an increase in operational efficiency following digital skills classes • Number of Indiana towns/cities/counties with a strong online presence • Number of residents participating in Indiana digital communities • Number of small businesses owned or operated by an individual who identify as one or more covered populations that report an increase in digital skills • Number of businesses owned or operated by an individual who identify as one or more covered populations that report an increase in sales following digital skills classes • Number of businesses owned or operated by an individual who identify as one or more covered populations that report an increase in operational efficiency following digital skills classes • Number of Indiana towns/cities/counties with an above average share of covered populations with a strong online presence

Objective	Outputs	Outcomes
3.4.1	• Number of digital parenting programs developed • Number of digital parenting programs funded • Number of digital parenting trainings conducted • Number of digital citizenship programs developed • Number of digital citizenship programs funded • Number of digital citizenship trainings conducted	• Number of parents who participated in digital parenting programs • Number of parents who completed digital parenting programs • Number of parents who report feeling more confident when it comes to parenting decisions related to digital technology • Number of individuals who participated in digital citizenship programs • Number of individuals who completed digital citizenship programs • Number of individuals who report a knowledge gain following participation in a digital citizenship program • Number of individuals who report changing their online behavior following participation in a digital citizenship program
3.4.2	• Number of programs developed • Number of programs funded • Number of experts consulted during program development • Number of individuals participating in programs • Number of individuals who complete one or more programs	• Number of program participants reporting an increase in knowledge • Number of program participants reporting feeling more confident in their ability to remain safe online • Number of program participants reporting feeling more confident in their ability to protect their privacy while online
3.4.3	• Number of trainings developed • Number of trainings conducted • Number of adults participating in trainings • Number of partners conducting training opportunities	• Number of training participants reporting an increase in their media literacy • Number of training participants reporting an increase in online socialization • Number of training participants who report feeling more connected to family, friends, or their community after applying what they learned in the training
3.4.4	• Number of topics identified • Number of trainings developed • Number of trainings funded • Number of experts consulted in training or resource development	• Number of individuals participating in trainings • Number of individuals who report a knowledge gain following trainings • Number of local leaders participating in trainings • Number of covered populations participating in trainings • Number of covered populations served by local leaders who participate in trainings

Objective	Outputs	Outcomes
3.4.5	• Number of digital skills classes developed • Number of digital skills classes funded • Number of digital skills classes conducted • Number of digital skills classes conducted in areas with an above average share of covered populations	• Number of individuals who completed at least one digital skills class • Number of returning class participants • Number of individuals who completed at least one digital skills class who identify as one or more covered populations • Number of returning class participants who identify as one or more covered populations • Number of individuals reporting an increase in the number of online activities they conduct following class completion • Number of individuals reporting an increase in frequency of use of online activities following class completion
3.4.6	• Number of programs developed • Number of resources developed	• Number of justice-involved individuals participating in programs • Number of justice-involved individuals using resources
3.4.7	• Number of programs developed • Number of resources developed • Number of programs funded • Number of resources funded • Number of digital skills trainings utilizing the wrap-around programs or resources	• Number of individuals completing the training who report they would have been unable to participate without the wrap-around services • Number of trainings with wrap-around services conducted in areas with an above average share of covered populations.
3.4.8	• Number of digital navigators or similar personnel deployed • Percent of the state (by area or population) served by a digital navigator or similar personnel • Percent of areas with an above average share of covered populations serviced by a digital navigator or similar personnel	• Number of hours of technical assistance provided by digital navigators or similar personnel • Number of programs conducted by digital navigators or similar personnel
3.4.9	• Develop resources for integrating digital skills in adult education programs • Provide funding to adult education programs to integrate digital skills	• Number of adult education programs using the developed resources • Number of adult education programs with integrated digital skills offered in areas with an above average share of covered populations • Number of individuals graduating from adult education programs who have integrated digital skills

Objective	Outputs	Outcomes
3.4.10	• Number of best practices published in the online repository • Number of partner organizations contributing best practices • Number of recognition programs developed • Number of professional development opportunities offered	• Number of organizations recognized • Number of organizations nominated • Number of organizations participating in networking opportunities • Number of individuals participating in professional development opportunities • Number of individuals accessing the best practices
3.5.1	• Number of resources published on the online repository	• Number of website users • Number of returning website users • Number of assets featured on the digital asset map
3.5.2	• Number of marketing campaigns implemented • Number of community resource centers or libraries distributing the digital equity resources	• Reach of the marketing campaign • Engagement with the marketing campaign • Number of resources distributed by community resource centers and libraries
3.5.3	• Number of metrics published • Number of evaluation summaries published	• Number of page views of metrics • Number of page views of evaluation summaries

Appendix C - Public Comments

Comment Subject	Number of Comments Related to Subject
Typographical errors	1
Data Analysis	1
Metrics	3
Gaps in DE efforts	3
Covered Populations Representation	4
Word Choice	1
Workforce Development	4
Language Translation of Outreach Materials	2
Labor Practices	1
ISP Engagement	4
Digital Navigation	5
Engagement Methodology	4
Device Refurbishment Programs	2
Digital Skills Training	6
Economic Development	2
Device Ownership	2

Comment Subject	Number of Comments Related to Subject
Device Use Health Concerns	1
Environmental Impacts	1
Local Media	2
Municipally-owned Networks	1
Broadband Performance	1

The Indiana Broadband Office received 16 comments during the 30-day public comment period for our Digital Equity plan. Public comments were submitted by internet service providers, nonprofits, advocacy groups, and members of the general public. All public comments were responded to in a timely manner. Each of these comments was read and taken into consideration in the final submission of our plan.

Comment #1

Received on 1/9/2024 by Rose.Scovel@indyMPO.org
Rose Scovel, AICP | Principal Planner (she/her)
Indianapolis Metropolitan Planning Organization

"Thoughts on the Indiana Digital Equity Plan…

Page 8: "With 6.6% of the state being rural and 78.4% being urban, and 14.9% being micropolitan (small towns)" – based on what criteria? If the state is only 6.6% rural why such a heavy focus on rural in the stakeholder engagement?

Page 16: Using the OCRA regions dismisses the fact that Central Indiana is the economic engine of the state by dividing it among regions, particularly dividing Marion County. There are many different regions in the state between agencies (even though we've been asking for standardized regions for 2 decades), so why OCRA?

Page 37: "Collaborating" with existing organizations only works if they have the staff capacity to take on new roles, and that capacity needs operational funding.

Appendix B: I know these are "example" metrics, but there are too many of them, they are generally not meaningful, and they are difficult and/or time intensive to collect. What are you really going to track?

Generally HOW are you going to reach urban unhoused populations who may have multiple barriers (illiterate, unemployed, low income) to overcome mitigate the digital divide? Many don't go to libraries or community centers because they are kicked out for being unkempt or dirty or smelling bad. If something isn't on a bus route it isn't going to be a meaningful asset. If someone isn't able to check out a device during regular business hours because of work or caregiving responsibilities, how does that improve their access? There are rural areas where even a hotspot isn't going to get you anything because there isn't sufficient coverage. Many of these recommendations don't go deep enough into addressing the concerns."

Indiana Comment #1 Response:

"Thank you for your public comment we received on 1/9/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #2

Received on 1/11/2024 by KSteinhiser@dwd.IN.gov -
Kaitlyn Steinhiser (she/her) Director of Policy – Indiana Department of Workforce Development

"Hello!

I commend the work of the stakeholders who contributed to Indiana's Digital Equity Plan. This is a giant leap in the right direction and will improve the lives of Hoosiers across the state. I'd like to comment on page 16 of the plan. It is helpful to break the local digital equity plans into categories, as it seems like they were created within three clear lanes. However, as all of them are focused on equity, I would recommend changing the name of the first category. "People-focused" or "Hoosier-focused" may be more applicable here. It would be unfortunate if readers thought that the community and economic development plans did not consider equity as much as the individual-focused plans. Thank you again for your work!"

Indiana Comment #2 Response:

"Kaitlyn,

Thank you for your public comment we received on 1/11/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan. We value your insight on the existing digital equity plans in Indiana, specifically, the categorization of those plans. Word choice is essential in these situations, and you mention good points, we will consider your wording.

Thank you – Indiana Broadband Office – IBO Public Comment"

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Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #3

Received on 1/24/2024 by tstrong@cwa4900.org –
Tim Strong – President CWA Local 4900

"IBO Team,

Thank you for the posted draft of the proposed Indiana Digital Equity Plan. Below are comments from the Communication Workers of America. I believe many of the recommended components are already included in the IBO draft.

Federal, state, and local governments have allocated billions of dollars to promote digital equity and inclusion programs that aim to ensure that all people and communities have the access, technology, and skills to reap the full benefits of our digital society. This includes $2.75 billion from the bipartisan infrastructure law and millions more from sources including the American Rescue Plan Act and state and local appropriations.

Communications Workers of America (CWA) members are experienced broadband technicians and customer service workers, as well as community leaders who believe in digital equity and high-speed broadband for all. CWA's local leaders stand ready to support government agencies in crafting plans that are effective in closing the digital divide. In this document, we outline some of CWA's recommendations on how digital equity

programs (DEPs) should be designed and implemented.[1]

DIGITAL EQUITY PLANS SHOULD RESULT IN MEASURABLE IMPROVEMENTS TO THE QUALITY OF LIFE

Short and long-term evaluation of Digital Equity Plans should not just look at whether individuals in the target populations have basic access to broadband and connected devices but also evaluate whether this new access is resulting in measurable improvements to quality of life, including health, education, and employment opportunities.

DEPs should incorporate a scoring rubric that evaluates whether the needs of all target populations have been considered and whether the plan incorporates solutions to address barriers to broadband adoption and use. The scoring rubric should focus on equitable distribution while prioritizing the most affected, including those in urban areas who

disproportionately lack broadband connections.[2]

Activities that could be included in DEPs are: digital skills and cyber security training, IT-related workforce development, subsidized broadband service and devices, community access points, educational programs on how to access subsidized services with a focus on unhoused individuals and other hard-to-reach low-income families living in very rural areas, group houses, or basement units. Individuals assisting the covered population

(e.g. caretakers) should also be eligible to benefit from potential digital literacy services. The National Digital Inclusion Alliance promotes the Digital Navigators Model for local digital inclusion programs, which CWA supports when aligned with our principles for job quality, described below.[3]

[1] For a more comprehensive set of recommendations, See Comments of Communications Workers of America, Digital Equity Act of 2021, Request for Comments, NTIA Docket No. 230224–0051, RIN 0660–XC055 (May 1, 2023), https://drive.google.com/file/d/1auRx9NP0D36eLMw5Di0RLg05SnHrZ5d-/view?usp=sharing.

[2] Bipartisan Policy Center, "Understanding the Urban Digital Divide" (Mar. 5, 2021),

https://bipartisanpolicy.org/blog/urban-broadband-blog.

[3] NDIA, The Digital Navigator Model, https://www.digitalinclusion.org/digital-navigator-model/.

NEED FOR A COMPREHENSIVE CONSULTATION PROCESS

DEPs may not succeed if government agencies fail to thoroughly consult with all community stakeholders as part of the plan development. To do so, agencies should meet with representatives of target populations before working on any draft plans and continue to meet with the same populations to review the proposed drafts. Oral presentations and written summaries of the proposed digital equity plans should be published in primary languages that are spoken in the community and in an easy-to-understand format (e.g. larger fonts for older adults).

IMPORTANCE OF CONSULTATION WITH WORKERS AND LABOR UNIONS It is crucial that DEP planning includes consulting with organized labor and local workforce investment boards as key stakeholders in the process. The labor movement has implemented many successful labor-management training partnerships over the years, some of which include digital skills training. These programs serve as models for advancing the goals of the BEAD and Digital Equity Programs.

DIGITAL EQUITY PROGRAMS SHOULD ADOPT WORKER-CENTERED PERFORMANCE STANDARDS

Digital equity programs may not be as effective if they do not contribute to the creation of high-quality career jobs in the communities that they intend to serve. For digital equity investments tied to workforce training, CWA recommends DEPs incorporate the AFL-CIO's performance criteria into their short- and long-term evaluation of the programs.[4] These include:

- Increase in living standards including wages and benefits (healthcare, childcare, paid leave, control of scheduling, retirement)
- Improved job security and employability including career pathways
- Participation and progress of underserved populations
- Opportunities for workers to exercise their right to form and join unions
- Improved labor-management relations, including support for digital skills and literacy training in collective bargaining agreements

CWA recommends that, for grant programs that will create new staff positions and organizational infrastructure, grantees be required to comply with fair labor practices, similar to the approach taken in the BEAD NOFO[5] and the US Department of Transportation's RAISE grants NOFO.[6] The role of "digital navigator," and similar positions, should be considered on par with other public service jobs and come with high quality training, good wages and benefits, the right to form a union, and other basic hallmarks of quality jobs.

[4] Comments of American Federation of Labor and Congress of Industrial Organizations (AFL-CIO), In the Matter of Infrastructure Investment and Jobs Act Implementation, Docket No. 220105-0002, at 6 (Feb. 4, 2022).[5] NTIA, Notice Of Funding Opportunity, Broadband Equity, Access, And Deployment Program, NTIA-BEAD-2022, at 56. [6] Department of Transportation, "Notice of Funding Opportunity for the Department of Transportation's National Infrastructure Investments", G4910-9X,

https://www.transportation.gov/sites/dot.gov/files/2022-01/FINAL%202022%20RAISE%20NOFO.pdf [The DOT states that it "intends to use the RAISE program to support the creation of good-paying jobs with the free and fair choice to join a union and the incorporation of strong labor standards and training and placement programs."].

Respectfully, "

Indiana Comment #3 Response:

"Tim,

Thank you for your public comment we received on 1/24/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

We agree that short- and long-term evaluation will be essential to determining the success of this plan. Appendix B on page 43 outlines some of the metrics we are considering using. We would be open to considering any metrics your organization has identified, in addition to those listed in your email.

As you stated in your email, much of what you shared is already in the plan. We appreciate you and your organization's passion about digital equity and the work you are doing to help make digital equity plans across the U.S. effective. We hope you continue to participate in our community engagement efforts and look forward to future insights from you.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #4

Received on 1/29/2024 by j2sw@j2sw.com -
Justin Wilson j2sw@j2sw.com

"I wanted to make sure, in your plan, you do not forget about the Fixed Wireless providers in the state. Many of these have been funding the build of their networks from their own money. They have invested in the communities where they live. They have supported the local businesses and schools.

The following companies represent close to 10,000 Indiana residents who have little or no Internet options. These are companies who have built into rural areas. Keep them in mind when considering technology and funding."

Indiana Comment #4 Response:

"Thank you for your public comment we received on 1/29/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #5

Received on 2/1/2024 by charles.pellicane@human-i-t.org -
Charles Pellicane – EVP Business Development – Human-I-T

"Hello,

As the leading digital equity non-profit in the nation with more than a decade of experience providing digital inclusion services, we believe access to technology is a right, not a privilege and that the following best practices are critical to best bridge the digital divide:

1. Holistic Digital Navigation: Focus on addressing all aspects of digital inclusion, including connectivity, access to devices, digital skills, and technical support. Provide comprehensive support to individuals or communities to ensure they have the necessary resources and knowledge to fully participate in the digital world.
2. Assisted at Time of Call, Not 'Air Traffic Control': Be responsive and proactive in assisting individuals seeking support. Instead of acting as a controlling authority, aim to provide personalized assistance in real-time, addressing their specific needs and challenges, with solutions in-the-moment rather than pushing them to make additional phone calls or visit additional websites.
3. Culturally Competent Services: Recognize and respect the diverse cultural backgrounds and identities of the communities served. Tailor services to meet the unique needs and preferences of different cultural groups, ensuring that everyone feels included and valued.
4. Collaborative Process with Trusted Partners: Foster partnerships with community-based organizations (CBOs), local governments, educational entities, and other trusted stakeholders. Work together to identify and address digital inequities, leveraging collective expertise and resources to achieve more significant impact.

5. In-person and Remote Support through Various Communication Channels: Offer both in-person and remote support options to accommodate different circumstances and preferences. Utilize multiple communication channels, such as phone, email, chat, or video conferencing, to ensure accessibility and convenience for individuals seeking assistance.

Providing broadband alone is not enough. We need to provide devices, digital literacy training, and technical support. It is not "if you build it, they will come." Without providing these critical wrap-around services, broadband will go unused and there will still be a significant portion of the population on the wrong side of the digital divide. Furthermore, as a technology refurbisher we support programs that refurbish and redistribute existing devices.

By implementing these best practices, your state can enhance digital equity and digital inclusion efforts, making a positive impact on individuals and communities. Digital equity is social equity.

Thanks, Charles Pellicane – EVP Business Development – Human-I-T"

Indiana Comment #5 Response:

"Thank you for your public comment we received on 2/1/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #6

Received on 2/6/2024 by emacey@incap.org –
Erin Macey, PhD Director Indiana Community Action Poverty Institute

"To Whom it May Concern:

We are grateful for your hard work to advance digital equity in Indiana. Attached, please find comments from members of the Indiana Skills2Compete Coalition. We hope that they will support you in your efforts to build Hoosiers' capacity to access and navigate the digital world, while also advancing access to higher-wage jobs that require digital skills.

Warmly,"

Attachment:

Dear Indiana Broadband Office:

The undersigned members of the Indiana Skills2Compete Coalition appreciate the opportunity to provide comments on Indiana's draft Digital Equity Plan. Our focus is primarily on how Indiana can invest in and measure digital skills. The Indiana Skills2Compete Coalition is a bipartisan group of state legislators as well as education, business, labor, and community leaders that come together with the aim of developing a skilled workforce and serving as a resource for policymakers and state leaders working toward that end. We use research on best practices to promote public policies that create education and training opportunities in alignment with the needs of employers, offering

more Hoosiers an opportunity to secure high-wage, family-sustaining jobs.

A major policy priority is creating and supporting inclusive digital skills policies so that people can access good jobs, and 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 Indiana Broadband Office.

Digital skills are critical in Indiana's current job market, where 89% of jobs require digital skills. These jobs are across every industry, particularly impacting the majority of jobs in Indiana that require more than a high school degree but not a college degree. Workers who qualify for jobs that require even one digital skill can earn an average of 23 percent more than in a job requiring no digital skills, yet 1 in 3 workers do not have even the foundational digital skills necessary to enter and thrive in today's jobs, and these statistics are magnified for historically marginalized populations, like people of color.

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 Indiana 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 Indiana 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.

A crucial finding of the digital equity report from the National Skills Coalition 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 whitecollar 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. Investment in digital equity also benefits businesses. A 2022 survey from the Indiana Chamber of Commerce found that 83% of businesses struggle to meet their talent needs, with a skills mismatch being a primary driver. Investments in digital skills helps

employers train and hire the workforce they need to thrive. Businesses will also be able to avoid turnover costs (estimated at $25,000 when a worker quits within the first year to over $78,000 after five years) as their digitally up-skilled workers will be retained for longer and able to contribute more productive to the company. This means that the investment in digital equity will lead to a win-win for Indiana workers (able to succeed in the labor market) and Indiana businesses (able to hire and retain digitally-skilled workers).

Benefits from digital equity investment will extend beyond businesses and workers, however, creating additional tax revenue for the state and federal government, with estimates of additional taxes ranging from $1,840 to $3,680 per Indiana household per year.

For all these reasons and many more, it is crucial that we thoughtfully incorporate digital skills training in Indiana's digital equity plan, investing in our community members – including rural residents, veterans, low-income individuals, people of color, and people with language or literacy barriers, among others – so that we all may succeed and thrive.

Effectively expanding access to the internet, to devices, and to skills will also require us to be thoughtful about investing in the workforce needed to undertake these ambitious goals. We would like to see greater emphasis within the plan on how the state intends to recruit and train workers to meet these essential needs. In particular, developing effective strategies to attract more women and people of color into the digital infrastructure workforce while also supporting their training by meeting needs like childcare and transportation will be critical.

Thank you again for the opportunity to submit these comments. Questions about this submission can be directed to Erin Macey, emacey@incap.org, 317-270-0874.

Peggy Frame, Executive Director of Southeast Community Services

Emily Weikert Bryant, Executive Director of Feeding Indiana's Hungry

Marie Mackintosh, President/CEO of EmployIndy

Erin Macey, Director, & Zia Saylor, Research Associate, Indiana Community Action Poverty Institute Amanda Bergson-Shilcock, Senior Fellow at National Skills Coalition"

Indiana Comment #6 Response:

"Thank you for your public comment we received on 2/6/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #7

Received on 2/6/2024 by payton@educationsuperhighway.org –
Payton - EducationSuperHighway (ESH)

"Good afternoon,

Hope you're doing well! After having the chance to read the Indiana Digital Equity plan, we at EducationSuperHighway (ESH) want to commend y'all on the tremendous work that the

Indiana Broadband Office has done to ensure affordable, accessible, reliable, and equitable connectivity in your state.

In particular, we were excited to see the inclusion of developing, supporting, and coordinating state, regional and local digital equity coalitions as a major implementation strategy. I have attached to this email the public comment and model language that ESH believes will complement this expressed goal. Our suggestion, ACP-focused cohorts, aims to build state-wide stakeholder engagement from trusted institutions that can help with outreach and support for unconnected households.

Thank you for allowing us the opportunity to comment on this forward-looking plan! Please let me know if you have any questions, or would like to discuss this further with my team.

Best, Payton"

EducationSuperHighway Comments and Model Language for Indiana's Digital Equity Act Plan:

Background

Approximately 28 million households in the United States do not have high-speed broadband. Seventeen million of these households are offline because they cannot afford an available internet connection. This broadband affordability gap has become one of the primary inhibitors of access to economic security and opportunity. It is a reality centered in our nation's poorest communities and disproportionately impacts people of color. As states consider their comprehensive broadband affordability strategies, a critical tool that should be leveraged and included to connect millions of unconnected households is the Affordable Connectivity Program (ACP). Achieving national best practice ACP adoption rates can significantly accelerate closing the broadband affordability gap, connecting two-thirds of the 17 million households impacted by this gap. Especially as the ACP's future status is being considered, States should reiterate its importance by referencing it as crucial to successfully realizing digital equity in their state. Furthermore, States can use Digital Equity Act plans and funding to implement key strategies to increase ACP adoption.

The impact of the ACP can be felt equally across partisan lines, with participation rates nearly identical in Republican (31.2% of eligible households) and Democrat states (30.8%).1 Our analysis of ACP enrollment data also shows that both rural and urban households benefit greatly from the program, with 13% of rural households and 15% of households in metro or urban areas enrolled in the ACP.

Millions of eligible households are not taking advantage of the program as they are unaware that the ACP exists. Surveys of low- and lower-middle-income households have found that in some communities, up to 75% of eligible households are unaware that they might be eligible for federal broadband benefits. Trust in the program is another critical barrier, as many eligible households are concerned about sharing personal information as part of the enrollment process. Finally, enrollment barriers such as application accessibility, language assistance, and documentation challenges necessitate direct support for a portion of eligible households that cannot complete the enrollment process independently.

Broad outreach alone often fails to build the trust needed to drive people to action and should be paired with outreach and enrollment support from trusted sources such as government agencies that administer benefit programs, school districts, community health

centers, faith leaders, community-based organizations, and businesses they regularly interact with. These organizations have existing relationships with eligible households, know the most effective time, place, and manner to increase awareness in the communities they serve, and have established outreach channels such as in-person community events, digital marketing, emailing, phone banking, text messaging, physical information distribution and posters in high-traffic target areas. Furthermore, they provide trusted space and avenues to support enrollment in the ACP, and can help mitigate some of the challenges households face when they enroll.

EducationSuperHighway (ESH) believes that state leaders should take action to convene a state-wide ACP-focused cohort that brings together these critical trusted institutions, leveraging Digital Equity Act funds to enable outreach to and support for unconnected households. At a micro level, the cohort will provide a collective framework to ensure the creation and sustainability of an ecosystem of organizations and stakeholders working on digital equity initiatives, with a particular focus on the ACP. At a macro level, this work can provide a model for what state-wide ACP implementation could look like, as well as confirm the most effective role that the state may play in supporting future capacity or competitive grant-funded recipients in alignment with Digital Equity Plans.

The cohort should consist of a series of workshops intended to promote ways in which leveraging the ACP contributes to achieving digital equity across the state. To facilitate this, ESH can provide pro bono co-facilitation of the cohort and serve as a subject matter expert and technical advisor, providing its expertise to the cohort community. This group should strive to create a collaborative space where organizations can learn from and inform one another's work across the state. It should also promote coordination and collaboration between the state and other stakeholders, alleviating the unintentional creation of silos, gaps, and/or redundancies in programming.

To date, ESH has partnered with broadband offices in several states to implement the cohort model and equip FCC grant recipients, as well as other digital equity-minded and focused organizations, with foundational knowledge on the ACP and how leveraging this program contributes to achieving digital equity across the state. This includes: 1) how the ACP operates; 2) tools, training, and resources with respect to awareness and enrollment activities and tactics; 3) the intricacies of cross-sector partnerships and campaign execution; and 4) best practices for implementing digital and on-the-ground ACP campaigns. We have also seen great success with this initiative when the ACP Cohort is embedded in the operations of larger digital equity groups or coalitions, for example, as a working group of a larger digital equity stakeholders group. This allows a group of organizations to address a core element of digital equity – affordable broadband access – with the support of ESH's ACP subject matter expertise.

Roles & Responsibilities

State Broadband Offices and their staff are uniquely positioned to lead the creation and facilitation of a statewide ACP Cohort. In order to ensure an effective and streamlined cohort implementation, a Broadband Office staff member should be designated to lead the cohort engagement. It is also a best practice to include additional staffing resources with a focus on communications, who can assist with managing state-led communications, campaigns, messaging and awareness initiatives related to the cohort. A critical element of the state's role will be to incentivize motivation and participation, and states should set an ACP enrollment goal in order to achieve this that is measurable and can be used to

regularly assess progress and course-correct where appropriate.

Objectives and Programming

The main objective of the ACP Cohort is to combine the expertise and experience of key institutions, organizations, and stakeholders to make a larger impact on the state's most unconnected communities. An important output of this cohort should be to increase ACP enrollment across the state. Through the creation of curated resources and programming, and a series of workshops, the cohort should:

1. Create a forum for knowledge sharing, including an understanding of current ACP-related work across the state through guest speakers and cohort member updates

2. Share lessons learned and emerging best practices

3. Address common barriers

4. Provide opportunities for cohort members to support and reinforce one another

5. Supplement and leverage needed resources where possible (i.e., cross-posting marketing outreach and sharing digital equity advocate personnel)

6. Create a pipeline for future funding opportunities, including identifying funding intermediaries that can help expand the funds' reach and impact by supporting smaller and less resourced organizations, to ensure that key state organizations can contribute to ACP adoption

The creation of a statewide ACP-focused cohort will serve to ensure that mechanisms for increasing broadband affordability and connecting unconnected households remain a cornerstone of the state's Digital Equity Plan. The cohort will secure cohesion between the state's plan, the execution of their capacity grant funds, and alignment with the ecosystem of competitive grant funded institutions to create the conditions for successful ACP adoption statewide.

Recommendations for supporting broadband affordability if the ACP is not renewed

If the ACP does not get renewed, states will lose a critical intervention to solving the broadband affordability gap. It is therefore important that states reiterate how crucial the ACP is to achieving digital equity in their state. Nevertheless, a linchpin of state DE plans should focus on assisting the work of statewide agencies, organizations and other trusted institutions to support community members with awareness and enrollment in the low-cost broadband plans that will remain post-ACP. We strongly urge that if ACP is not renewed, states should explore ways they can partner with these essential awareness and "on-the-ground" enrollment partners to support them with continuing to drive broadband adoption in their communities. As states solidify their processes to engage and include these key organizations, such as convening key stakeholders around digital equity, we recommend a continued focus on broadband affordability. A cohort model still lends itself well as a forum to disseminate information, share lessons learned, and engage organizations around affordability strategies and low-cost broadband plans.

Model Language for Indiana's Digital Equity Plan

The following is suggested language about a statewide ACP-focused cohort to insert into the state's Digital Equity Plan:

The ACP is a critical tool to achieve digital equity in Indiana, and sees it as a cornerstone of this work. In addition, Indiana will implement a cohort strategy to further support digital equity and internet affordability. The cohort will unite trusted stakeholders that have existing relationships with

ACP-eligible households – such as libraries, schools, housing authorities, faith-based, tribal, or community-based organizations – and equip them with tools and resources to promote ACP adoption. Moreover, this cohort will convene those organizations that have the greatest trust and relationships with those they serve, many representing the identified covered populations. Concretely, the ACP cohort will join a series of workshops intended to promote ways in which leveraging the ACP contributes to achieving digital equity across the state. Such a cohort can provide a collective framework to ensure the creation and sustainability of an ecosystem of stakeholders working on digital equity initiatives, with a particular focus on the ACP. This group should strive to create a collaborative space where organizations can learn from and inform one another's work. It should also promote coordination between the state and other stakeholders, alleviating the unintentional creation of silos, gaps, and/or redundancies in programming."

Indiana Comment #7 Response:

"Thank you for your public comment we received on 2/6/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #8

Received on 2/7/2024 by karisa@digitunity.org -
Karisa Tashjian – Digit Unity

"Dear Indiana Broadband Office,

Congratulations on completing the draft of Indiana's Digital Equity Plan!

As a national nonprofit organization focused on the device ownership aspect of digital equity, we are delighted to see the inclusion of devices as a goal within Indiana's plan. Owning a computer is crucial for thriving in the modern economy. Those without a computer are unable to harness the vast opportunities that the internet provides, such as employment, education, telehealth, commerce, finance, communication, and much more. Everyone who needs a computer should have one.

This is a watershed moment for advancing digital equity. We offer this feedback as a means to share our unique perspective, leveraging nearly 40 years of work on the issue of device ownership, a national lens into how states are approaching the issue, and our role in administering a nationwide practitioner network. We are truly and sincerely vested in your success.

First, we would like to emphasize four overarching points:

1. Large screen device ownership: Personal device ownership provides a unique computing experience that cannot be replicated through public use of computers or shared devices.

Large screen devices such as laptops, desktops, Chromebooks, and tablets, are critical for a full and equitable computing experience. While smartphones are often more affordable than the upfront cost of a computer, evidence shows the use of smartphones alone may limit the range of one's online activity and depth of overall digital skills.

2. Ecosystem approach: To ensure that all Indiana residents are able to obtain a free or low cost computer, establishing a robust supply of free and affordable devices through accessible, resilient, community-level distribution systems is critical. Systems thinking is required, with active involvement from a diverse range of actors and stakeholders. Digitunity's Methodology for a Sustainable Device Ecosystem (https://digitunity.org/our-approach/) provides a framework for addressing this issue on a large scale.

3. Sustainability: While short-term gains are possible, our collective efforts must aim for sustainable solutions that far outlast this five-year federal investment. Building a plan around merely purchasing devices would be shortsighted, missing this landmark opportunity to create comprehensive change. Instead, we must develop solutions that transform the way corporate, government, and institutional IT assets are managed at scale. Repurposing previously used technology for community support can make computer ownership more accessible. Technology reuse is a practical and environmentally friendly solution for expanding device ownership.

4. Device quality and intended use: Affordable devices must be reliable; quantity cannot replace quality. It is also critical that the choice of device matches a recipient's intended use and context. While less expensive devices may be a quick win within a limited budget, a healthy device ecosystem will provide economical solutions that meet the full range of recipients' needs.

Regarding Indiana's plan, we offer the following feedback and recommendations:

- Kudos!: Congratulations on addressing several important components regarding a device ecosystem from the goal of device ownership, inclusion of peripheral devices (see our Device Essentials graphic (https://digitunity.org/community-forums/device-essentials/), sharing of best practices to engaging participants in refurbishing and receiving a computer, encouraging the donation of devices, consumer education and attention to the need for assistive devices.

- Device type clarification: While devices are mentioned throughout Indiana's plan, there is not a clear goal to prioritize large-screen computers over smartphones. Only using smartphones to interact with the online world is limiting. Clarifying this distinction throughout the plan for large screen device ownership will ensure that the focus remains on providing individuals with the tools necessary for full digital access and participation.

- Refurbishing: Refurbishing is a key component of a device ecosystem and necessitates a strong emphasis on technical skills and expertise, particularly to guarantee the secure handling of data. It requires working with certified vendors to ensure that e-waste is responsibly handled and that the entire process is financially viable. Digitunity administers a national network of nonprofit refurbishers, made up of over 90 organizations including organizations in Indiana. We highly recommend investing in the scale and capacity of effective, existing entities. We caution against identifying any single vendor, whether nonprofit or for-profit, as the lone refurbishing solution for the state.

- Workforce opportunity: Refurbishing computers can be a viable workforce development program with a low entry point for staff and a robust career ladder to family sustaining wages. Plus, it may come with its own set of funding sources (such as the Workforce Innovation and Opportunity Act) to support the work on an ongoing basis. Developing a new program or integrating into an existing refurbishing program that is designed to train personnel in technical skills and refurbishment would not only increase the State's capacity, but also create a pipeline of technology talent for future initiatives.

- Supply is critical: As noted, generating a robust and ongoing supply of technology to be refurbished is necessary for a sustainable device ecosystem. While some supply can be generated through donations from individuals, it is typically corporations, government, and other large institutions that yield the biggest quantity and highest quality of devices that can be refurbished. Efforts such as a statewide campaign for businesses donations will be extremely helpful to your efforts, as well as targeted engagement of organizations with large amounts of technology. Digitunity has deep knowledge regarding the generation of supply, and can be utilized as a resource. In December 2022, Digitunity spearheaded the effort to pass the federal Computers for Veterans and Students Act which will soon direct repairable federal computers to nonprofit technology refurbishers. Indiana can be a beneficiary of this program.

- Support for device deployment: Planning is required for deployment of computers to Covered Populations as it is a complex, multi-step, multifaceted process. Specific training and support should be provided to entities that are tasked with providing devices to Covered Populations. Intentional effort should be placed on developing a deployment network through community-based organizations, with formalized connections made between device sources in populated hubs and rural deployment points. While public libraries are often thought of in this role, many libraries played this role during the pandemic (via federal Emergency Connectivity Funds) and found that they were ill-equipped and not interested in further serving as deployment partners in the future. It will be important to ensure that deployment partners are interested, have the capacity, and are supported in this role.

- Technical support: It is important to distinguish technical support from digital skills support. Library staff and Digital Navigators may not be equipped or even permitted to provide in-depth technical support. Technical support is a specialized customer service function that addresses complex technical issues beyond the scope of standard help desk assistance. It plays a crucial role in resolving technical problems, providing hardware repair services, offering warranty support, and troubleshooting intricate hardware-related failures. Technical support professionals are highly skilled individuals with expertise in various technical domains. Their primary responsibility is to assist users in resolving intricate technical challenges and ensuring the smooth operation of their devices. New computer users and owners often face a digital skills gap in using the computer which does not require technical support but rather skills support. We recommend looking at device supply sources as the first stop for technical support.

- Connecting supply to deployment: Digitunity has a longstanding online technology donation matching platform that can be utilized to connect the supply of new and refurbished devices to vetted community organizations for deployment. This is a critical and often overlooked part of the overall device ecosystem, and we'd be happy to share more about this with your team.

Leveraging the support of outside entities, such as Digitunity or other national actors engaged in this work, could help speed and inform the implementation process and enhance the capacity investments made in Indiana's local practitioners, stakeholders, and government departments. We firmly believe that with a shared vision, engagement of non-traditional partnerships, and creative approaches, there are ample resources available to significantly increase device ownership, both now and in the years beyond this federal investment.

We wish you great success in this important endeavor.

Sincerely, Karisa Tashjian"

Indiana Comment #8 Response:

"Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #9

Received on 2/7/2024 by headlines@benton.org -
Kevin Taglang - Executive Editor - Benton Institute for Broadband & Society

One key requirement of state digital equity plans is that they include a state's vision of digital equity. The National Telecommunications and Information Administration (NTIA) suggests that digital equity visions address at least these two questions:

1. What will digital equity look like in the context of your state?
2. What are the broad goals that should be accomplished in executing this plan (e.g., improve rural health outcomes, increase underrepresented youth employment in technology-related fields)?

NTIA has specifically advised states to "lead with equity," intentionally identifying, amplifying, and centering the voices of those most affected by the digital divide and disconnected communities.

With the extraordinary task and responsibility of state policymakers and local communities in mind, the Benton Institute for Broadband & Society launched the Visions of Digital Equity project to aid both in ensuring that more community voices are heard in crafting visions that increase opportunity for all.

Through surveys, community meetings, interviews, conversations, and a collaborative writing process with community contributors, we have arrived at a set of principles to help guide both the process and the resulting visions of digital equity.

We learned that a well-crafted vision of digital equity has the potential to be very powerful. It can:

- Offer a glimpse of a state transformed by universal connectivity,
- Provide a roadmap and resources for the digital inclusion efforts to come, and
- Act as a north star for goal setting, planning, and implementation efforts over the months and years to come.

The best visions of digital equity will be community centered and focused on creating change, specific and clearly articulated, and ambitious but attainable.

The Benton Institute for Broadband & Society reviewed Indiana's draft *Digital Equity Plan* and shared a summary of it with our readers (https://www.benton.org/content/fcc-freezes-acp-enrollment-benton-institute-asks-congress-act).

Upon review, we offer 10 Principles for Digital Equity Visions (see attachment and https://www.benton.org/sites/default/files/VisionsDigitalEquity.pdf). We hope these principles help the people of Indiana evaluate both the draft *Digital Equity Plan* and the revision of the plan. To that end, we also offer *A Checklist for Evaluating Digital Equity Visions* (see attachment and https://www.benton.org/sites/default/files/DEV_checklist.pdf)

Thank you for the opportunity to weigh in on the plan; I would be happy to answer any questions or discuss the potential of Indiana's vision for digital equity.

Indiana Comment #9 Response:

"Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #10

Received on 2/7/2024 by Joni_Hart@comcast.com -
Joni Hart - Vice President, State Government Affairs, Comcast NBCUniversal

"Thanks all!

- Joni Hart

Vice President, State Government Affairs

Comcast NBCUniversal"

Comcast Cable Communications, LLC, on behalf of its subsidiaries (together, "Comcast"), submits this letter in response to the Indiana Broadband Office's ("IBO") Draft Digital Equity Plan ("Draft Plan"). Comcast thanks the IBO for seeking stakeholder comment and commends it for an exemplary start to achieving digital equity for all Indiana residents and communities.

Supporting our local communities has been core to Comcast's DNA, and given Comcast's long and proven track record of success expanding broadband access and adoption in Indiana, Comcast stands ready to partner with the State in its digital equity efforts through various existing programs. Comcast offers these comments to the Draft Plan in the spirit of longstanding partnership and looks forward to continuing this critical work to advance digital equity and close Indiana's digital divide.

Comcast's Significant Investments in Indiana Connectivity

Comcast strongly supports broadband deployment and adoption initiatives in Indiana and stands ready to further support the State's efforts. Comcast continues to invest heavily in the State, with investments during the past three years totaling $1.3 billion, including over $562 million toward technology and infrastructure improvements like Internet network upgrades. Nearly two million Indiana homes and businesses have access to Xfinity Internet and Comcast Business products and services, including speeds of 1.2 gigabits per second or more. This includes the addition of 121,000 homes and businesses within the last five years, demonstrating Comcast's ongoing commitment to serving Indiana. Comcast is working in partnership with the Indiana Office of Community and Rural Affairs ("OCRA") to provide Internet service to unserved and underserved areas of the State, including portions of Allen, Bartholomew, Carroll, Cass, Delaware, Fayette, Hendricks, Jennings, Johnson, Hamilton, Huntington, La Porte, Madison, Marshall, Montgomery, Morgan, Porter, Starke, and Wayne Counties, as part of OCRA's Next Level Connections Broadband Grant Program.1 Comcast's investments serve as force multipliers for public funding, including 18 grants from Next Level Connections, totaling more than $50 million in combined investment from Comcast and the State.2 Over the past three years, Comcast has added and upgraded nearly 10,000 miles of our network to connect homes and businesses and is preparing for the rollout of our next generation 10G network across the United States, including throughout our Indiana service territory. This growth is all part of the more than $20 billion investment Comcast made nationwide from 2018 to 2022 in our networks, which now cover more than 60 million U.S. homes and businesses.

Internet Essentials

Internet Essentials ("IE") is the largest and most successful broadband adoption initiative in the industry, connecting more than 10 million Americans to broadband Internet at home since launching in 2011. IE is designed to be a wrap-around solution that addresses the main barriers to broadband adoption. IE provides subscribers with access to broadband service at speeds of 50/10 Mbps for $9.95 per month or 100/20 Mbps for $29.95 per month (for IE Plus), access to millions of Xfinity WiFi hotspots, a wireless gateway at no additional cost, the ability to obtain low-cost or no-cost computers, unlimited data, and free digital skills training.3 Notably, while the IE price of $9.95 per month has remained steady since the program launched, speeds for that service have increased seven times, including more than doubling during the early days of the pandemic.4 Recognizing the critical need for Internet-ready devices in addition to a broadband connection, Comcast has distributed more than 200,000 free and subsidized laptops.5 Comcast recently donated laptops to the Indianapolis Public Library, and recipients can access the library's on-demand learning system that features Northstar Online Learning and other resources.6 We also donated laptops to the Indiana Latino Coalition Against Domestic and Sexual Violence as part of a new digital technology program that will provide survivors with digital literacy training.7

The IE program has been designed to eliminate barriers for financially constrained households and help more families benefit from home Internet access. To become an IE customer, there is no credit check required, no term contract requirement, and customers who do not have a social security number (or prefer not to provide their social security number) may provide other forms of identification to apply.

• Since 2011, 656,000 low-income Indiana residents in 164,000 homes have connected to the Internet through IE.

• The top cities for IE connections include Indianapolis, Fort Wayne, South Bend, Gary, and Elkhart.

Comcast/Xfinity proudly participates in the Affordable Connectivity Program ("ACP") with all tiers of Internet service the company offers, including two tiers (IE and IE Plus) that are fully covered by the $30 ACP benefit. We hope that the federal government will renew ACP funding and are proud to have supported and/or cohosted nearly 900 ACP events nationwide since October 2022, resulting in thousands of ACP enrollments.

In Indiana, we have partnered with the following organizations to close the digital divide:

• Allen County

• ARC of Indiana

• Indiana Black Expo

• South Bend Education Foundation

• Elkhart Education Foundation

• Beacon Learning Center

• Fort Wayne Housing Authority

• Teachers' Treasures

• St. Joseph County's Senior Resources Fair

• Indiana Township Association

• Boys & Girls Clubs of Northeast Indiana.

• Fort Wayne Literacy Alliance

• Warren Township Education Foundation

• Per Scholas

• Indiana After School Network

Beyond connectivity, we work with tens of thousands of partners across the country, including nonprofits and city leaders, to support digital skills training to improve economic mobility. We offer free training through our IE Learning Center: Internet Essentials – Free Internet from Xfinity (xfinity.com), which features hundreds of modules on Internet basics, online safety, digital skills for everyday life, and advanced skill-building.8 The content is curated from partners like Common Sense Media, Goodwill, CNBC, Women in Sports Technology, and more. In addition, Comcast has partnered with several experts, including ConnectSafely, Older Adults Technology Services ("OATS"), and Council for Opportunity in Education, to develop printed digital skills curricula that are distributed to thousands of community partners free of cost. These include several online safety toolkits for seniors and students, discussion guides for parents, and our Jurassic World Science, Technology, Engineering, Arts, and Math ("STEAM") curricula. Comcast has long invested in nonprofit

partners focused on digital skills via the Comcast NBCUniversal Foundation to help provide skills-building, job training, and other career development offerings for the full spectrum of learners, from elementary, middle and high school students to adults. Locally, these organizations include:

• La Casa de Amistad

• Boys & Girls Clubs of La Porte County

• Boys & Girls Clubs of Bloomington

• Lyn Treece Boys & Girls Club of Tippecanoe County

• Boys & Girls Club of Noblesville

• Foundation for Youth of Bartholomew County

• Code Black Indy

According to a recent study, "Wired and Hired: Employment Effects of Subsidized Broadband Internet for low-Income Americans" published in the American Economic Journal, IEs customers make an average of $1,385 more per year and are 8 percent more likely to be employed than those eligible for but not connected through IE.9

Digital Equity Challenges and Opportunities

Barriers to Broadband Adoption. Both longitudinal research and empirical evidence demonstrate that the primary barriers to broadband adoption extend beyond affordability and include perceived relevance and digital readiness, among others:10

Perceived Relevance. A significant population of Americans who have not yet adopted home broadband do not recognize the relevance of such connectivity. The National Urban League ("NUL") Lewis Latimer Plan explains that perceived relevance may be tied to a lack of awareness and understanding of the Internet's uses and capabilities, in addition to the necessary skills needed to use it.11 NTIA's Internet Use Survey data showed that 58 percent of the 21 million offline households indicated no interest in or need to be online.12 Moreover, a 2021 Pew Research Center survey found that 71 percent of non-broadband users say that they would not be interested in an at-home broadband connection.13 These numbers help demonstrate why education for and outreach to the unconnected and newly connected regarding broadband and its associated benefits is imperative for closing the digital divide.

Digital Readiness. Digital readiness is "the sum of the technical skills and cognitive skills people employ to use computers to retrieve information, interpret what they find, and judge the quality of that information" and "the ability to communicate and collaborate using the Internet."14 Digital readiness challenges impact different parts of people's lives, including the use of developing technologies, online educational resources, and telehealth capabilities.15

While the U.S. workforce has a high demand for digital skills, many workers, especially workers of color and those without higher education, lack these skills.16

Other Adoption Barriers. Other adoption barriers pertain to information and language, distrust, and structural issues tied to poverty. Information and language barriers may

pertain to individuals determining program eligibility, parsing an application process, and setting up devices and services. Addressing language barriers is important for Comcast, which is why IE call center agents can help IE applicants in more than 240 languages, in addition to American Sign Language.17 Distrust may pertain to biases against free services and government programs, as well as uncertainty about additional costs and privacy concerns.18 Structural barriers may include complicated housing situations, such as recent moves or plans to relocate.19 Comcast recognizes that just like there is no single solution to addressing broadband adoption, the underlying challenges are also not monolithic.

Bridging the Adoption Gap. Empirical evidence demonstrates that community outreach and engagement – by digital navigators, community-based organizations, community anchor institutions, faith-based leaders, and other trusted voices – is vital to overcoming complex adoption barriers.

To this end, Comcast has been investing for more than a decade to expand digital equity and inclusion in Indiana, including through community outreach and engagement efforts. Project UP is our comprehensive initiative to advance digital equity and help build a future of unlimited possibilities. Backed by a $1 billion commitment to reach tens of millions of people, Project UP encompasses the programs and community partnerships across Comcast, NBCUniversal, and Sky that connect people to the Internet, advance economic mobility, and open doors for the next generation of innovators, entrepreneurs, storytellers, and creators.20

Project UP encompasses a number of longstanding and new initiatives in collaboration with local communities, including:

Digital Navigator Programs. Digital navigators are a powerful and proven tool to aid broadband adoption. Digital navigators are typically hired volunteers or staff from trusted community institutions – such as libraries, social or public service agencies, and community- based organizations – who can assist users in overcoming barriers to adoption in a tailored manner.

Digital navigators can address the relevance of broadband by demonstrating benefits like access to information, telehealth capabilities, and introduction to upskilling programs that serve as pathways to education, employment, and more. A recent Boston Consulting Group (“BCG”) study supported by Comcast surveyed 1,500 people who have participated in programs with digital navigators and found that 65 percent of respondents were able to obtain Internet connectivity or a connected device, and 85 percent of respondents now use the Internet more frequently.21 The same research demonstrates that the benefits of digital navigators extend beyond individuals obtaining Internet access – almost 50 percent of respondents obtained better health care; more than 40 percent of respondents received support for essentials like food, rent, and housing; and more than one in three respondents found a new job or secured higher incomes.22 Given the importance of digital navigators, Comcast, in 2022 alone, invested

$11.4 million in more than 225 nonprofits to support digital navigator programs across our service areas.23 Comcast currently partners with organizations in Indiana to create and support digital navigator programs, including The Literacy Alliance, Brightpoint, and Fort Wayne Housing Authority. Comcast’s support includes a recent $50,000 donation to The Literacy Alliance in Fort Wayne, which will support digital navigation and skills-building

opportunities.24

Additionally, investing in digital navigators will provide individuals from all racial/ethnic and educational backgrounds with the opportunity to learn more from members of their own communities about how broadband-connected technology can be relevant to their

lives. Research from BCG revealed several other key findings, including that (1) trust and relationship-building are key to reaching disconnected communities; (2) familiar outreach channels are most effective at getting learners in the door; (3) one-on-one attention is often most effective, especially for learning fundamental skills; (4) resource-sharing and local coordination can minimize burdens on individual digital navigators; and (5) digital navigators are the trusted voice on the ground for understanding community needs.25 These solutions address the main barriers to broadband adoption, as described above, and increase digital opportunity for all Hoosiers.

Digital Skills Programs. As digital navigators play a critical role in helping members of Covered Populations overcome adoption barriers,26 a related component of successful digital adoption efforts is programming to help people develop digital skills once they are

connected. Comcast works with organizations that provide skills building, job training, and other career development offerings for the full spectrum of learners, from high school students to adults.

A February 2023 report from the National Skills Coalition and Federal Reserve Bank of Atlanta indicated that 92 percent of jobs available today require digital skills, yet almost one-third of

U.S. workers lack opportunities to build these skills.27 Jobs that require even one digital skill can earn an average of 23 percent more than jobs requiring no digital skills, which translates to an increase of $8,000 in annual income.28 Developing these digital skills is not only a value add for individual workers, especially for workers of color, but a benefit to the larger U.S. economy.

Comcast supports digital exploration initiatives that teach individuals the basic skills needed to increase competency and confidence in using technology, spark interest in technology careers, and prepare individuals for the jobs of the future through early exposure to technology fields, in- school and after-school programming, technology and computer science programs, and soft skills training. This includes Girl Scouts of Central Indiana, Girl Scouts of Northern Indiana- Michiana, Indianapolis Urban League, and the Boys & Girls Clubs of Greater Northwest Indiana

Lift Zones. Comcast, together with nonprofit partners and city leaders, has created more than 1,250 Lift Zones in community centers nationwide, including 26 Lift Zones in Indiana.

Along with free Internet connectivity, Lift Zones offer hundreds of hours of free educational and digital skills content. Not only are 50 percent of low-income households in major Comcast markets within walking distance of a Lift Zone, 40 percent of users report that they would not have had Internet access without the Lift Zone, and 58 percent report that the Lift Zone reduces stress for studying, working remotely, and managing online tasks.

Internet Essentials Partnership Program. In addition to IE, the Internet Essentials Partnership Program (“IEPP”) is designed to help accelerate Internet adoption and provides

the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access.

Other Initiatives: Accessibility. Comcast remains focused on helping members of Covered Populations, including individuals with disabilities. In addition to accessible technology innovations such as the X1 Voice Remote and the Xfinity Adaptive Web Remote,29 Comcast supports several partner organizations. For example, we partner with Crossroads, Opportunity Enterprises, and Reins of Life. The Comcast NBCUniversal Foundation also recently awarded a $1.3 million two-year grant to Easterseals to expand digital literacy training for young adults with disabilities enrolled in Easterseals employment programs.30 Students with intellectual and/or developmental disabilities ages 16 to 24 will be trained on how to navigate the Internet, communicate through email, create PowerPoint presentations, prepare resumes, use assistive technology, and more.31

Final Thoughts

Comcast encourages Indiana to focus on digital equity efforts that will be the most impactful, including digital navigators, digital skills training programs, and partnerships. Comcast believes that partnerships are paramount to advancing digital equity efforts because closing the digital divide starts at the local level by meeting people where they are and responding to their specific needs. Communities win when the private sector, government, and community organizations join forces to achieve shared goals. To that end, Indiana should create an inclusive framework that allows many organizations to participate directly in grant programs and fosters such participation through partnerships and coalitions. Comcast's more than a decade of dedicated digital adoption and community engagement efforts demonstrate that the private sector has been a critical partner in facilitating digital equity efforts to date. Indiana's Digital Equity Act implementation should seek to amplify and scale the efforts of these existing successful relationships and ensure that the private sector continues to be a force multiplier for public funding.

Thank you again for the chance to offer our thoughts on the State's Draft Plan. Comcast looks forward to continuing to work with the IBO as it refines and implements its Digital Equity Plan.

Sincerely,

Joni Hart

Vice President, State Government Affairs Comcast "

Indiana Comment #10 Response:

"Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #11

Received on 2/7/2024 by rolamasri@ehtrust.org -
Rola Masri - Director of Government Outreach, Environmental Health Trust
Theodora Scarato - Executive Director, Environmental Health Trust

""Dear Sir or Madam,

Please find attached the Environmental Health Trust comments and studies regarding the Indiana Digital Equity Plan for your consideration and to be put into the public record. Please confirm receipt of this email.

Do not hesitate to contact us if you have any questions.

Best regards,

Rola Masri
Director of Government Outreach
Environmental Health Trust
RolaMasri@EHTrust.org

Theodora Scarato
Executive Director
Environmental Health Trust
Theodora.Scarato@EHTrust.org "

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Purdue University Center for Regional Development

Indiana Broadband Office

Indiana Office of Community and Rural Affairs

Submitted by Email: IBOPublicComment@iot.in.gov

Re: The Environmental Health Trust Comments on the Indiana Digital Equity Plan Executive Summary

We thank Purdue University Center for Regional Development (PCRD), Indiana Broadband Office (IOB) and the Indiana Office of Community and Rural Affairs (OCRA) for considering our comments on the Indiana Digital Equity Plan.1 The Environmental Health Trust (EHT) is a not-for-profit scientific think tank that promotes a healthier environment through research, education and policy.2

EHT shares the vision of PCRD, IOB and OCRA that "Indiana residents trust and use innovative connectivity for improved quality of life, resulting in inclusive and resilient communities that ensure opportunities for all."3

Digital equity initiatives focus on communities with technology access disparities who oftentimes also experience disparities in environmental, social and/or health justice. We submit that a responsible digital equity plan must consider the quality, sustainability and upgradability of the technology being introduced and also their impact on the environment and health to ensure continuity into the future.

The three overarching goals of the Indiana Digital Equity Plan are: "1) Provide Indiana residents with universal connectivity that is affordable, accessible, reliable, equitable and

available in public and private spaces to ensure maximum adoption; 2) Ensure all Indiana residents have access to affordable devices needed to live, work, and thrive along with the education to utilize that technology safely and successfully; 3) Build digitally resilient and equitable communities by supporting new and existing ecosystems for local prosperity."

We urge PCRD, IOB and OCRA to favor wired connections all the way to the end user where feasible in these communities and not wireless infrastructure which will not meet future connectivity needs, harm the environment and the health of residents and create another digital divide in just a few years.

Wired connections are superior to wireless as evidenced by the following sections:

1. Scientific and policy documentation on human health and environment supporting the use of wired versus wireless broadband

2. Performance, scalability, cybersecurity and competition

3. Energy efficiency

4. EHT Recommendations

5. Attachments

1. Scientific and Policy Documentation on Human Health and Environment Supporting the Use of Wired versus Wireless Broadband

The scientific evidence4 is adequate to support strong public health policies to reduce wireless radiation, especially for children and vulnerable populations. A growing body of scientific evidence of wireless radio frequency (RF) radiation at levels far below FCC limits is showing evidence of cancer,5 increased oxidative stress,6 genetic damage,7 structural and functional changes of the reproductive system,8 memory deficit,9 behavioral problems10, and neurological impacts.11

However, despite these health issues, wireless technologies are often put forward as the solution to bridge the digital divide and connect the unconnected. Thus, vulnerable populations often end up receiving significantly increased exposure of radiofrequency radiation, an emerging environmental justice issue.

Research shows that the environmental levels of radiofrequency radiation (RFR) that people are exposed to have increased with the densification of cell tower networks closer to where people live, work and play and levels are highest in urban areas.12 Studies show a 70x increase13. Cell towers are often disproportionately placed in neighborhoods with higher numbers of minorities and students needing free and reduced meals.14 In Montgomery County, for example, cell towers are overwhelmingly placed in schools with higher numbers of minorities, english as a second language students, and those who subscribe to free and reduced lunch rates.15 Parents in schools with a higher white and more affluent population have organized and successfully fought off the towers.16

Cell antennas are being put up in front of apartments and renters are not being informed nor are they a part of the decision making process. Low income families and renters have less ability to move or mitigate exposures. Health care inequalities will further exacerbate

health inequities as people in under-resourced communities will receive unequal care for the damages from exposure to RFR.

Policies to fasttrack 5G and wireless technology are pushed to fix the digital divide despite evidence indicating it could exacerbate the digital divide. In June 2020, the U.S. the Government Accountability Office (GAO) released a report on 5G which concluded that 5G may "worsen" the digital divide. The experts the GAO convened stated that "5G deployment would likely exacerbate disparities in access to telecommunications services, known as the 'digital divide.'"

Expert Recommendations on Technology Safety

Recommendations of the United States Government Accountability Office

According to a 2012 Government Accountability Office (GAO) Report titled "Telecommunications: Exposure and Testing Requirements for Mobile Phones Should Be Reassessed"17 it is stated that "By not formally reassessing its current limit, FCC cannot ensure it is using a limit that reflects the latest research on RF energy exposure…" and that "Some consumers may use mobile phones against the body, which FCC does not currently test, and could result in RF energy exposure higher than the FCC limit." This report resulted in two recommendations made to the FCC:

Recommendation 1: "The Chairman of the FCC should formally reassess the current RF energy exposure limit, including its effects on human health, the costs and benefits associated with keeping the current limit, and the opinions of relevant health and safety agencies, and change the limit if determined appropriate."

Recommendation 2: "The Chairman of the FCC should reassess whether mobile phone testing requirements result in the identification of maximum RF energy exposure in likely usage configurations, particularly when mobile phones are held against the body, and update testing requirements as appropriate."

According to the GAO report "Despite many years of consideration, FCC still has no specific plans to take any actions that would satisfy our recommendations. Accordingly, we are closing the recommendations as not implemented."

Findings and Ruling of the U.S. Court of Appeals for the D.C. Circuit 2021 EHT et al. v. FCC 18:

1. The Court found that the FCC ignored scientific evidence on negative health effects from long term wireless radiation exposure at current allowable levels, especially in regards to children, the health implications of long-term exposure to RF radiation, the ubiquity of wireless devices, and other technological developments that have occurred since the Commission last updated its guidelines; and the impacts of RF radiation on the environment.

2. The Court also ordered the FCC to "provide a reasoned explanation for its decision to retain its testing procedures for determining whether cell phones and other portable electronic devices comply with its guidelines."

3. The court ordered the FCC to examine the record evidence regarding long term exposure to children, health effects unrelated to cancer and environmental impacts.

To date, neither the FCC nor the FDA has responded. This landmark ruling highlights how no federal health agency has reviewed the full body of current research to ensure current safety standards are protective.

Recommendations of The American Academy of Pediatrics

The American Academy of Pediatrics (AAP) has written several letters to the FCC calling on them to update wireless safety limits to protect children19 stating that, “Current FCC standards do not account for the unique vulnerability and use patterns specific to pregnant women and children. It is essential that any new standard for cell phones or other wireless devices be based on protecting the youngest and most vulnerable populations to ensure they are safeguarded throughout their lifetimes.”

In response to the National Toxicology Program animal study findings of cancer and DNA damage20 from cell phone radiation, the AAP also issued the cell phone safety tips specifically for families21 to reduce exposure to wireless radiation including, “If you plan to watch a movie on your device, download it first, then switch to airplane mode while you watch in order to avoid unnecessary radiation exposure.”

The American Academy of Pediatrics states of cell towers22 that, “An Egyptian study confirmed concerns that living nearby mobile phone base stations increased the risk for developing: Headaches, Memory problems, Dizziness, Depression, Sleep problems”

Recommendations of the New Hampshire State Commission on 5G Health and Environment

In 2019 the New Hampshire government passed House Bill 522 “An act establishing a commission to study the environmental and health effects of evolving 5G technology.”23 The Commission released its Final Report on Commission to Study the Environmental and Health Effects of Evolving 5G Technology24 in 2020 with findings that safety assurance for wireless technology “come into question because of the thousands of peer-reviewed studies documenting deleterious health effects associated with cellphone radiation exposure.” In its report the Commission issued 15 recommendations:

1. Support statewide deployment of fiber optic cable connectivity with wired connections inside homes.

2. New Hampshire schools and libraries should replace Wi-Fi with hardwired connections.

3. Require setbacks for new wireless antennas from residences, businesses, and schools.

4. New Hampshire health agencies educate the public on minimizing radiofrequency radiation (RFR) exposure with public service announcements on radio, television, and print. “Warnings concerning the newborn and young as well as pregnant women”

5. Establish RFR free zones in commercial and public buildings

6. New measurement protocols needed to evaluate high data rate, signal characteristics associated with biological effects and summative effects of multiple radiation sources.

7. RFR signal strength measurements for cell sites should be done by independent contractors.

8. NH professional licensure to offer education so home inspectors can include RFR intensity measurements.

9. Warning signs to be posted in commercial and public buildings.

10. The State should measure RFR and post maps with measurements for the public.

11. Require 5G structures to be labeled for RFR at eye level and readable from nine feet away.

12. Engage agencies with ecological knowledge to develop RFR safety limits that will protect the trees, plants, birds, insects, and pollinators.

13. Under the National Environmental Policy Act, FCC should do an environmental impact statement as to the effect on New Hampshire and the country as a whole from 5G and the expansion of RF wireless technologies.

14. Cell phones and wireless devices should be equipped with updated software that stops cell phones from radiating when positioned against the body.

A resolution to US Congress to require the FCC to commission an independent health study and eview of safety limits.

Recommendations of The Connecticut Department of Public Health

The Connecticut Department of Public Health states in its FAQs on Cell Phones that it is "wise" to reduce cell phone radio frequency to one's brain.25

Recommendations of The North Carolina Public Health Department

The North Carolina Public Health Department lists the full cancer findings of the NTP study26, the FDA stance and also the American Academy of Pediatrics recommendations to reduce cell phone radiation stating "there is some concern that exposure to non-ionizing radiation, also called radio frequency radiation, that is emitted by cell phones may result in an increased risk of cancer or other health effects"

Recommendations of The Maryland State Children's Environmental Health And Protection Advisory Council

The Maryland State Children's Environmental Health And Protection Advisory Council, whose 19 member Commission includes experts in public health, pediatricians, state health and environment agencies and legislators issued a report recommending reducing wireless exposure to children in schools and homes.27

Recommendations of The California Department of Health

The California Department of Health released an advisory on how to reduce cell phone radiation28 stating children may be more at risk and "Although the science is still evolving, some laboratory experiments and human health studies have suggested the possibility that long-term, high use of cell phones may be linked to certain types of cancer and other health effects." Recommendations include, "Parents should consider reducing the time their children use cell phones and encourage them to turn the devices off at night."

Recommendations of The Santa Clara Medical Association

The Santa Clara Medical Association Best Practices for Technology in schools29 recommends reducing Wi-Fi exposure and restricting cell towers near schools.

Recommendations of The California Medical Association

In 2014, the California Medical Association passed two resolutions regarding wireless standards: 1. To "support efforts to reevaluate microwave safety exposure levels associated with wireless communication devices, including consideration of adverse non-thermal biologic and health effects from non-ionizing electromagnetic radiation used in wireless communications"; and 2. To "support efforts to implement new safety exposure limits for wireless devices to levels that do not cause human or environmental harm based on scientific research."

Recommendations of Scientists With Expertise in Electromagnetic Radiation

Numerous medical groups have called for policies to reduce children's exposure30. For example, the EMF Scientists are over 259 scientists from 41 countries who have peer-reviewed publications on electromagnetic fields who made a 2015 appeal to the United Nations31 and all member States in the world to encourage the World Health Organization "to exert strong leadership in fostering the development of more protective EMF guidelines, encouraging precautionary measures, and educating the public about health risks, particularly risk to children and fetal development."

With these expert recommendations in mind we recommend that the Indiana Digital Equity Plan opt for and prioritize wired connections. The use of wired technology decreases the need for wireless and will help reduce environmental levels of wireless radiation.

Scientific Research on Wireless Impact to Health and Environment

Wireless radiation cannot be considered safe and FCC limits are inadequate to address long term health effects from daily exposure to wireless radiation. As stated by the EPA, FDA, and Department of Interior, current FCC guidelines address heating effects of short term exposures only.32 Current FCC human exposure guidelines are unchanged since 1996 and were based on now antiquated limits developed by ANSI/IEEE C95.1-1992 and NCRP's 1986 Report. These limits identified the level of adverse effects based on studies which exposed a few monkeys and rats to RF radiation for less than one hour, more than 40 years ago. They do not consider the biological effects of non-thermal or long-term low-level exposures of radiofrequency radiation documented in the scientific literature.33 Current guidelines also do not consider the documented effects of modulations and pulsation on living cells. As the DC Circuit recognized, these antiquated studies are a far cry from properly assessing the health and environmental impacts of modern technology and ubiquitous wireless devices.

No federal agency with health or science expertise has evaluated the comprehensive body of scientific research on the human health and environmental impacts of wireless radiation. An ever growing body of scientific evidence documents adverse effects from RF radiation at exposure levels well below FCC limits34 with research findings that include cancer, the induction of oxidative stress, epigenetic effects, impacts to neurotransmitters, memory, brain development and damage to the immune, endocrine, hematological and

reproductive system. Further, studies have found impacts to tree canopy, plant growth, pollinator health and the orientation, migration and breeding of wildlife.35 The science clearly indicates that wireless networks create harmful interference in humans as well as flora and fauna. Attachments 2 and Attachment 3 below document the significant body of scientific evidence indicating adverse effects to humans and the environment from radiofrequency exposure.

Further, as documented in Attachment 1 on Regulatory Gaps, there are no federal agencies with health and science expertise engaged in activities related to reviewing the science on health effects of rising environmental RF levels from network infrastructure.

2. Performance, Scalability, Cybersecurity and Competition

Despite efforts made to fund broadband expansion, according to the Indiana Digital Equity Plan 38.9% of rural community residents cannot get internet installed. While close to 50% are hindered by the price of internet connectivity.

Performance and Scalability

While wireless infrastructure promises faster and cheaper deployment, it is no match for the performance of fiber infrastructure and ends up being costlier in the long run to maintain and upgrade.36 The poor performance metrics of wireless infrastructure costs our states billions of dollars when residents and businesses are held up by unreliable service, low speeds, and issues with cybersecurity37 and privacy.

Baseline speed requirements of 100/20Mbps (download/upload) can be achieved with current cable infrastructure. 5G wireless infrastructure offers speeds similar to what cable currently provides38 and is limited in its capacity to reliably offer faster upload speeds, unreliably peaking at just 50 Mbps when standing near the transmitter. Using funding for wireless infrastructure will put communities in another digital divide in just a few years when bandwidth demands increase with future technology demands.

Baseline speeds for fiber infrastructure is 1000/1000 Mbps (download/upload) far surpassing wireless speeds at its minimum performance capabilities. Currently cities that have adopted all fiber networks are seeing speeds of 10,000/10,000 Mbps with the capabilities of upgrading to Terabyte symmetrical speeds and quantum technology. Chattanooga, Tennessee adopted fiber to the premises 12 years ago with symmetrical speeds of 1000 Mbps and has now upgraded to 10 Gbps (or 10,000 Mbps) symmetrical speeds by simply replacing the software and keeping all the fiber intact.39 Fiber upgrades cost a fraction of wireless infrastructure upgrades. These savings will be passed down to underserved communities that need it the most. That is why it is critical to invest in a superior infrastructure, that is fiber, now which will pay off in the future.

The pandemic shutdowns forced large families to work and school from home and it was a quick lesson on the imperative need for fast, reliable internet that not only allowed us to quickly download information but to also have fast upload speeds so that multiple family members can have online video calls at the same time.

Wireless infrastructure fails in allowing multiple users on the same network to reliably have online video meetings at the same time.

Wireless infrastructure fails during inclement weather or when the path of the signal

is obstructed. Fiber and current cable infrastructure can reliably offer superior service without these challenges.

Cybersecurity

While it is important to teach residents cyber safety it is equally important to harden the infrastructure to keep out bad actors. Wireless broadband presents a major cybersecurity risk. Individuals, institutions and businesses have suffered great losses as wireless signals are easily accessible to hackers.40 Fiber and current cable infrastructure can reliably offer superior service with less risk to cybersecurity.

Competition

The quality of broadband will make or break the ability for these communities to compete with the rest of the United States and the world.41 Other countries have recognized the importance of fiber optics all the way to the premises and have invested heavily to reach 100% penetration, ensuring that even rural communities42 with unfavorable terrain have fiber. As of 2019 - 92% of China's internet users had fiber all the way to the home.43 62% of homes in the European Union 39 bloc nations have fiber to the premises.44 United Arab Emirates, Qatar, Singapore and Hong Kong all have higher than 90% penetration of fiber all the way to the premises while Iceland, Spain and Portugal are catching up at 76.8%, 73.5% and 71.1% respectively.45 The US, on the other hand, stands at 16.39% penetration of fiber to the premises and ranked 30th among Organization for Economic Co-operation and Development countries, as of 2020. 46

3. Energy Efficiency

According to IEEE Magazine, 5G base stations are expected to consume roughly 3 times the power of 4G base stations and more 5G base stations are required to cover the same area.47 Energy consumption is expected to increase by 61 times from 2020 to 2030 with 5G.48 Adding more strain on electric grids, especially when we have not fully moved to renewable energy, will further exacerbate carbon emissions.

According to countries that have already installed fiber to the homes (FTTH), like China and Spain, fiber is 85% more energy efficient than copper yielding a saving of 208GWh which represents a reduction of 56,500 tons of CO2 emissions. One study done by the Federal Environment Ministry of Germany and the German Environment Agency found that video transmission through fiber optics is nearly 50 times more energy

efficient than wireless.49 Research on whole network level assessments of the operational energy use implications of 5G warns "Energy-intensive user practices contribute to ever-growing levels of data traffic, and counteract 50the energy-saving potential of 5G efficiency improvements."51 Promoting technology that increases carbon pollution in already disadvantaged neighborhoods will further exacerbate environmental and social injustices.

4. EHT Recommendations

Recommendation 1: Individuals such as those with Electromagnetic Field (EMF) related disabilities and vulnerable populations like children, pregnant women, the sick and elderly should have equal access to safe wired (wireless radiation-free) technology.

Goal 1 of the Digital Equity Plan is to "Provide Indiana residents with universal connectivity

that is affordable, accessible, reliable, equitable and available in public and private spaces to ensure maximum adoption." There is a segment of the population that has developed or will develop microwave sickness, a debilitating reaction to electromagnetic fields including RFR. Microwave sickness is well documented in the medical literature.52 53 Electromagnetic related disability is recognized by the US government and multiple other entities.54 In addition, certain segments of the population are more vulnerable to radiofrequency impacts, including children, pregnant women, the sick and the elderly.55

The goal of the Digital Equity Plan is to provide connectivity to all Americans, regardless of disability status or age. Wired internet connections can safely and more effectively provide internet connectivity without the risks to individuals especially those with electromagnetic disabilities and vulnerable populations. This is in line with the expert recommendations cited above to provide fiber optics connectivity to all premises and hardwired connections all the way to devices, including replacing Wi-Fi with hardwired connections.

Recommendation 2: Communities with digital disparities should have access to reliable, affordable and cybersecure wired infrastructure all the way to the end user to ensure sustainability and affordability into the future as bandwidth demands increase.

Findings of the Digital Equity Plan surveys were that "The main reason overall for not paying for home internet was the cost of computers and internet service." 42% to 74% of the covered population cited internet cost as a barrier to digital adoption.

Having wireless infrastructure especially in disadvantaged areas will ultimately be more costly as more funds will be required to upgrade all the infrastructure when bandwidth demands increase.56 These costs will be passed down to disadvantaged communities that can least afford them. Upgrades will take longer in disadvantaged neighborhoods and threaten to put the residents in another digital divide when substandard infrastructure cannot keep up with the demands. This will be devastating to these communities especially after residents have become dependent on the technology for their everyday needs.

While wired infrastructure costs more initially to install, it provides superior performance, cybersecurity, and energy efficiency that will be sufficient for communities for a much longer time than wireless infrastructure.57 In the future maintenance and upgrade costs of fiber will be a fraction of the price of maintaining and upgrading wireless infrastructure. These savings will be passed down to the communities that most desperately need them.

Furthermore, while it is important to teach residents how to keep their information safe, it is equally important to harden the infrastructure with wired connections so that bad actors are less able to tap into wireless information floating in the air. Hacking into wireless infrastructure has cost our state billions of dollars, cost residents irreparable damage to privacy with their information posted all over the internet without their permission and businesses billions of dollars in damage.

Recommendation 3: "Strategy 3.4: Equip residents to participate in the digital world safely and prosperously." and "Objective 3.4.2: Support ad fund digital skills programs on online safety and privacy, specifically for covered populations." The Strategy and Objective should also include education on the impacts of RF exposure on humans, especially children, pregnant women, the sick and the elderly and ways to mitigate these impacts.58

Environmental Health Trust has developed public health fact sheets and educational

resources to communicate all the ways to reduce everyday wireless exposures.59 These educational resources are free and should be included in the Indiana Digital Equity Plan as part of the education plans to leverage.

Also, broadening the definition of stakeholders to include a wider range of groups including public health and environmental health organizations such as Environmental Health Trust as well as community groups and organizations. More outreach needs to be done with the American public so they understand this issue and can participate in the process.

Recommendation 4: We recommend that wired networks be installed instead of wireless access points. In addition, wired computers and associated equipment, along with training, should be provided to communities so they can learn how to use wired computers and technology.

We recommend against wireless broadband technology and instead recommend wired networks whenever possible. For example, in a library each desk can be equipped with an ethernet connection and adapters, same with schools. Elderly centers can be equipped with wired computers.

If Wi-Fi or wireless systems are to be installed then proper RFR measurements should be taken and publicly posted on maps so the RF radiation measurements may be accessed by all individuals concerned with wireless radiation exposure, especially those with electromagnetic sensitivity. We also recommend that proper signage be posted on all locations with Wi-fi hotspots and other wireless transmitters, visible at least 9 feet away, so that individuals with electromagnetic sensitivities may be alerted prior to high exposure. Full transparency is needed regarding RF exposures.

We are happy to meet with and provide PCRD, IOB and OCRA and affiliates with more information and resources if needed. We are also happy to partner with PCRD, IOB and OCRA to provide the digital safety skills training mentioned above.

Sincerely,

Theodora Scarato Executive Director

Environmental Health Trust

Theodora.scarato@EHTrust.org

Rola Masri

Director of Government Outreach

Environmental Health Trust

RolaMasri@EHTrust.org”

Indiana Comment #11 Response:

“Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment”

Comment #12

Received on 2/7/2024 by lorihenson@rebuildlocalnews.org -
Lori Henson – Policy Manager, Rebuild Local News

"Hello, Indiana Broadband Office! Please find attached a comment letter from our organization, Rebuild Local News. Our comment letter asks that Hoosier local newsrooms be included as "trusted community partners" and assets in Indiana's Digital Equity Plan, making them grant eligible as they provide services that align with Indiana's digital equity goals.

If you have any questions, please reach out to me. I am located in Terre Haute, so Indiana's digital equity plan and the power of Hoosier newsrooms to impact communities are of special importance to me.

I appreciate your time and consideration,

Lori

February 8, 2023

To the Indiana Broadband Office,

We write to you as a national organization that represents more than 3,000 newsrooms nationwide, including dozens of local newsrooms in Indiana. Our organization advocates for smart public policies to support the future of the local press. We believe Indiana has a significant opportunity to both support the continued development of a robust local press in Indiana while also pursuing broadband access and digital equity.

We are joined with our partner Indiana Public Media, which serves communities throughout the state with critical news and educational programming.

We applaud Indiana's demonstrated commitment to achieving the full promise of digital equity, including highlighting the importance of civic participation and digital skills among Indiana's covered populations. However, we would encourage the Office to incorporate local newsrooms in its inventory of trusted partners, particularly on projects relating to digital literacy and civic engagement among covered populations. Among the plan's stated goals are to "build digitally resilient and equitable communities by supporting new and existing ecosystems for local prosperity… [to] encourage, support and fund programs and resources according to best practices for digital civic engagement between local residents and leaders. … [and to] prioritize building on existing programs, particularly ones that have trusted relationships with individuals from covered populations." It is essential that those resources and services leverage the trust Hoosiers have in their local press, the ways Hoosier community newsrooms are already building digital skills and, most importantly, the essential role local newsrooms play in supporting the civic health of communities.

Although trust in institutions, including the press, is falling across the U.S., trust in local news remains high even accounting for variations in political affiliation and generation.1 Hoosiers already trust their local newsrooms, particularly those owned and operated in

Indiana, to give them credible information about their communities and their state. The Office could and should leverage that trust in advertising new and upgraded broadband services throughout the state, particularly outlets that serve covered populations. The Office already leveraged local news outlets to advertise digital equity focus groups and town halls. Continuing this approach as the Office rolls out new programs, opportunities and resources would not only leverage the trust audiences have in their local news outlets, but support local newsrooms, which are a vital community resource.

Moreover, many of these outlets already practice what the Office identifies as digital literacy programs. For example, during the pandemic, WTIU public broadcasting partnered with Jennings County School Corporation and IPBS to create an at-home learning partnership to provide datacasting technology to students in Jennings County who have unreliable or no access to broadband internet. Datacasting overcomes the unmet need for internet access by sending computer-based files over a television broadcast signal. Based upon that successful pilot project with JCSC, WTIU is exploring additional applications for datacasting technology, including education for the incarcerated population, job retraining, public safety applications, and more.2

Moreover, the connection between local news outlets and digital equity runs deeper still. Digital equity, or course, describes the conditions in which residents have the resources, infrastructure and skills to be full participants in their democracies, economies and societies, which is impossible to achieve without strong local news. A robust body of research of the last two decades has shown that areas that lack local news have lower voter turnout, less competitive elections,3 fewer residents informed about their Congressional representation4 and less likelihood of even Googling the mayor.5 But it doesn't stop there. A journalist who studied successful news outlets in West Virginia wrote, "There is an undeniable correlation between a strong local news product and a persevering local business dynamic."6 One expert even told Rebuild Local News7 building out broadband access without also shoring up local news is like providing "high speed access to garbage."

In the past the civic scaffolding provided by local news could be, broadly speaking, counted on. However, Northwestern University, the leading news desert watchdog, now estimates an average of 2.5 newspapers close weekly. Local nonprofit newsrooms, public broadcasters and digital-native upstarts are creatively working to fill gaps and remaining newspapers are ambitiously innovating their business models, but it's not enough to make up for the precipitous losses. What's more, in Indiana and nationwide, many news deserts are often broadband deserts as well – what is known as "double deserts." When Prof. Christopher Ali of Pennsylvania State University and PhD candidate Ryan Wang cross referenced news desert data with broadband desert data, they found just under 50% of news deserts were also broadband deserts. In Indiana, Scott County, Crawford County, Rush County, Ohio County, and Jennings County are news deserts, meaning they lack a local news outlet of any kind based in the county.

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News outlets that serve rural communities, in particular, likely suffer from poor broadband services that both decrease their ability to reach their audience, but also to develop revenue streams like digital advertising or digital subscriptions. The Indiana Broadband Office should consider projects that enhance the digital infrastructure and workforce capacity within newsrooms, such as a grant program for news organizations to upgrade websites. Such a program would not only support digital equity by creating more revenue opportunities for newsrooms via digital advertising, subscriptions and memberships, but by better serving the wider community. It would ensure that local news would be waiting for residents as they access greater broadband services, serving both the economic objectives of broadband access and digital equity as it relates to the local newsroom, as well as the civic objectives of digital literacy, as it relates to citizens' access to local news.

Indiana is fortunate to have innovative newsrooms that are stepping up to meet the needs of covered populations, including:

• Capital B, a news organization serving Black audiences that began in Atlanta, opened its second newsroom in Gary in 2023. The newsroom's mission aligns with the community and civic engagement goals of the state's Digital Equity Plan, as explained by co-founder Akoto Ofori-Atta. "Community engagement and community listening and fostering a sense of doing this journalism alongside and with the residents that we are serving — that's part of our DNA."

• Indiana Capital Chronicle, a nonprofit independent newsroom covering the state legislature, supports the digital equity goals of Indiana's plan by offering a comprehensive

look inside state government, policy and elections, focusing on how actions at the state level impact Hoosiers' everyday lives. Their website allows anyone to find their legislator and to follow legislation through the policy process.

• Mirror Indy launched in 2023 to provide nonprofit news coverage for Indianapolis, training and employing local residents as Documenters, covering public meetings in collaboration with a Mirror editor. This program engages residents in their government and shares that information free of charge with the community.

• Free Press Indiana is leveraging foundation funding from the American Journalism Project, Nina Mason Pulliam Charitable Trust, Herbert Simon Family Foundation, and others to invest in news innovation throughout the state. Additional access to grant funding through the Digital Equity Plan would allow their work to expand throughout Indiana, perhaps strategically focusing on the areas identified above as lacking both local news resources and broadband access.

The Office could help Hoosiers access more and better civic, government, and election information by funding reporting efforts through either partnerships with state broadcasters, statewide nonprofits or news outlets that are proven to serve covered populations. Special attention should be paid in areas that both lack local news and broadband services. Newsrooms are already using digital technology and ever more limited reporting resources to serve the civic and community engagement needs of their audiences through programs such as WFYI's community engagement journalism initiative, "America Amplified," which built a variety of community-focused outreach tools for the 2022 elections and deployed them locally. Through WFYI's community engagement efforts, lead remediation kit materials were translated into four languages, which resulted in a local partner reaching out more consistently to under-represented groups. WFYI's Bright by Text service continued providing age-based information to parents and caregivers, as well as sharing local information about essential supports such as utility insurance, job fairs and COVID-19 updates.

Projects like these could be strategically scaled in areas with high concentrations of covered populations and limited broadband access or adoption. Such a strategy would not only address the issues espoused by rural members of digital equity focus groups while also supporting the civic infrastructure of Hoosier communities, making it more likely that Indiana's digital equity investments will be sustainable and result in robust civic participation among all Hoosier communities.

We thank the Indiana State Broadband Office for its careful, diligent efforts to advance broadband and digital inclusion throughout the state. Its thorough and ambitious plans will surely help link Hoosiers to a better, more connected future.

Sincerely, Lori Henson

Policy manager

Rebuild Local News"

Indiana Comment #12 Response:

Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment

Comment #13

Received on 2/7/2024 by bgabriel@msfiber.net -
Bryan Gabriel - CEO – Mainstream Fiber Networks, LLC

""Dear Indiana Broadband Office,

Enclosed are Mainstream Fiber's comments in regards to the Indiana Broadband Office's "Digital Equity Plan". We appreciate your continued engagement.

Please contact me with any questions.

Best regards, Bryan Gabriel CEO – Mainstream Fiber Networks, LLC"

Comments of Mainstream Fiber Networks on Indiana Broadband Office's Digital Equity Plan

February 7, 2024

Mainstream Fiber Networks ("Mainstream") is pleased to submit these Comments on Indiana Broadband Office's ("IBO") Digital Equity Plan. Mainstream commends the IBO for its work to ensure that the Infrastructure Investment and Jobs Act's Broadband Equity, Access, and Deployment ("BEAD") program delivers connectivity to all residents of Indiana.

In particular, Mainstream endorses the Objectives outlined below, which we believe will enable ISPs like Mainstream to connect more unserved and underserved Hoosiers with fiber—an equalizing, future-proof technology for rural and urban consumers alike. Individually and taken together, these objectives would allow Indiana-based, Indiana-focused providers like Mainstream to craft a build plan that includes more residents, maximizes the reach of private and public investment, and gets us closer to our shared goal of universal service throughout the state.

Objectives Mainstream Fiber Networks supports:

• Objective 1.2.1: Provide incentives to ISPs that complement existing programs aimed at upgrading existing networks and reaching cost-prohibitive and unserved areas.

• Objective 1.2.2: Expand eligibility of state programs to ensure affordable connectivity access that meets the needs of the consumer.

• Objective 1.2.3: Waive state fees for broadband highway easement access, especially those in areas with an above-average share of covered populations.

• Objective 1.2.4: Streamline pole attachments and make-ready regulations, especially those in areas with an above-average share of covered populations.

• Objective 1.2.5: Facilitate collaboration between interested parties and ISPs to help Hoosiers take full advantage of ISP assistance programs.

• Objective 1.2.6: Develop and deploy resources for starting an ISP and/or supporting small ISPs.

• Objective 1.2.7: Work with BEAD and other funding programs to establish reporting and evaluation expectations to increase accountability and transparency.

• Objective 3.3.2: Leverage existing and future broadband infrastructure for workforce attraction.

• Objective 3.3.6: Provide incentives to employers who provide remote work opportunities and incentivize employees who work remotely to attract new residents.

Additionally, we would suggest that the IBO clarify or include the following:

• Objective 1.2.3: Waive state fees for broadband highway easement access, especially those in areas with an above-average share of covered populations.

    o Set a required timeline for submission and response from INDOT for permitting in addition to waiver of state fees.

• Objective 1.2.4: Streamline pole attachments and make-ready regulations, especially those in areas with an above-average share of covered populations.

    o Confirm all companies that own poles are covered by this point. We believe we understand that REMC's are currently not required to follow the same rules as privately owned power companies.

* * *

Again, Mainstream thanks the IBO for its comprehensive approach toward closing the digital divide in Indiana. Mainstream stands ready to assist the IBO in achieving this important goal. Please feel free to contact Bryan Gabriel, CEO of Mainstream, with any questions about this submission."

Indiana Comment #13 Response:

"Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #14

Received on 2/7/2024 by mnewman@ipbs.org –
Mark Newman - Executive Director – Indiana Public Broadcasting Stations

"Dear Indiana Broadband Office Administrator,

Please find attached our comments regarding the Indiana Digital Equity Plan. Should you have any questions, please contact me.

Thank you for your consideration, Mark Newman Executive Director"

We write to you as leaders of Indiana Public Broadcasting Stations, Inc., the nine NPR radio stations and eight PBS television stations that serve as trusted resources for news, educational programming, and entertainment. IPBS member stations work together to deliver free and accessible programming over the air, online, and in person. Our stations reach 95% of Indiana's population and more than 2.5 million Hoosiers consume IPBS content on a weekly basis.

We applaud your detailed and ambitious efforts to bring universal broadband and digital equity to Indiana. We encourage the Indiana Broadband Office to consider all local news organizations' roles in advancing digital literacy, adoption and broadband access programs.

For example, public broadcasters can play a direct role in helping train residents on the use of the Internet. Indiana's public broadcasters are in an ideal position to provide programs for digital navigators that help them improve their digital literacy skills. IPBS member stations can drive awareness of existing programs and amplify the reach of training programs by featuring training over the air, online, and through in-person educational programs.

To build on these programs and others, we ask that the Indiana Broadband Office designate local news outlets, public broadcasting stations, and organizations that support local news providers as "trusted community partners" and/or anchor institutions in their digital equity plan under the Digital Equity or BEAD programs.

Indiana's digital equity plan should also seek to strengthen local news outlets to provide trustworthy information as the state increases broadband access and use in communities. Digital equity aspires to equip residents with the resources, infrastructure, and skills to be full participants in our American democracy, economy, and society, which is impossible to achieve without strong local news providers. A robust body of research over the last two decades has shown that areas that lack local news have lower voting turnout, less competitive elections, and fewer residents are likely to know the name of their representatives or even google the mayor. One expert told Rebuild Local News that building out broadband access without also shoring up local news is like providing "high-speed access to garbage" because national news, partisan information, or outright falsehoods usually fill the vacuum left by weak or nonexistent local news outlets.

IPBS member stations collaboratively produce the Indiana Public Broadcasting (IPB) News service, which could play a significant role in local news gathering and dissemination as residents' broadband access increases. IPB News is already a critical source of relevant, reliable and trusted reporting across Indiana. IPB News seeks out communities underserved by news and information and actively deploys information and digital engagement tools to put those communities in a position to thrive. For example, IPB News produces Civically, Indiana, a multiplatform news and information service on how Hoosiers can engage with state government.

The Indiana Broadband Office should consider strengthening the ability of local news service providers like IPB News to produce trustworthy information in under-served areas. Some areas may lack local news entirely – areas called news deserts – or may no longer have a local news outlet that provides adequate coverage of important local matters. In Indiana, news deserts include Scott County, Crawford County, Rush County,

Ohio County, and Jennings County. These areas lacking broadband and adequate local news and are regarded as "double deserts" (in the parlance of the Rebuild Local News coalition). In double deserts, Indiana should consider supporting programs that fund news organizations to improve local coverage. That could mean a local entity expanding coverage into a neighboring community or a statewide news outlet creating a new reporting project. This would help improve civic participation.

We thank you for your dedication to broadband equity and access, as well as ensuring that all Hoosiers have the ability to be full digital participants.

Thank you for your consideration, "

Indiana Comment #14 Response:

"Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment"

Comment #15

Received on 2/7/2024 mrogers@southbendin.gov –
Madi Rogers – South Bend Connectivity Coalition

""Hello IBO!

On behalf of the South Bend Connectivity Coalition, we've compiled comments and feedback on the Indiana Digital Equity Plan; see attached.

Please let us know if you have any questions about the comments or would like to discuss any points further.

Best, Madi"

We, the undersigned members of the South Bend Connectivity Coalition, are writing to provide our feedback on the state's first digital equity plan for your consideration. This plan is an exciting step in the work to bridge the digital divide in communities throughout Indiana, and we are eager to be committed partners in this work. Especially as we look toward coming Digital Equity Capacity Grant funding, we have several comments regarding the plan's outlined goals, strategies, and objectives. We believe that clarifying and adding several priorities will empower communities like South Bend to best promote digital equity for our residents in the coming years.

About the South Bend Connectivity Coalition: Initiated by the Broadband Ready Executive Order modeled after IBO Broadband Ready Community Best Practices, South Bend Mayor James Mueller called on his administration to create the South Bend Connectivity Coalition in Fall of 2022. This Coalition is led by the City's Department of Innovation & Technology and tasked with coordinating local work and best practices around digital access and skills. While membership in the coalition is public and open to all, current active members include: the City of South Bend Department of Innovation & Technology, the St. Joseph County Public Library, the South Bend Community School Corporation, enFocus,

ChoiceLight, La Casa de Amistad, the Michiana Area Council of Governments, Comcast, and the University of Notre Dame (Wireless Institute; University Network & Telephony Services).

South Bend Connectivity Coalition Comments:

1. Highlight community philanthropic partnerships as a strategy to catalyze ongoing digital equity initiatives

As evidenced by this coalition, South Bend is committed to the power of local digital equity ecosystems to advance connectivity through diverse partnerships. We are excited to see these ecosystems at the core of Indiana's Digital Equity Plan. We also support the plan's focus to "Expand digital equity-focused capacity at the local level" (Strategy 3.1) and "Partner with organizations that work with covered populations to fund initiatives or elevate voices to ensure that community solutions are meeting their unique needs" (Objective 3.1.8).

In many cities, a critical strategy for expanding local digital equity capacity in this way has involved the creation of local digital equity funds, often in partnership with community philanthropic organizations. Baltimore, Cleveland, Kansas City, and Miami have successfully leveraged their community foundations to create digital equity funds that regularly invest in nonprofit organizations to launch and expand connectivity initiatives.

One of the strengths of Indiana is place-based and corporate philanthropic organizations. South Bend and our area have many private and place-based foundations that have played a role in digital equity pilots and work. We request that IBO specifically identify the value of philanthropic partners in building local digital equity capacity in the Indiana Digital Equity Plan. Moreover, we ask that the State permit a portion of Digital Equity Capacity Grant funds to seed dedicated digital equity funds housed at community philanthropic partners.

2. Identify municipal, nonprofit, and community-operated networks as an important tool to advance digital equity

In South Bend, we have seen and fostered valuable partnerships between internet service providers and our local community to advance digital equity. Recently, Comcast has created Lift Zones for public, high-speed internet access at a homeless shelter and community resource center. Citywide Classroom has partnered with T-Mobile's Project 10 Million to provide free mobile internet to South Bend students and their families. These partnerships have significantly contributed to our efforts to bridge the digital divide, and we are excited to see them prioritized in Indiana's Digital Equity Plan.

South Bend has also greatly benefited from municipal, nonprofit, and community-owned networks to provide access to South Bend families. In 2022, the South Bend Community School Corporation partnered with the City, enFocus, and Notre Dame's Wireless Institute to launch a CBRS private LTE network to provide free in-home internet access to over 150 low-income families. Since 2016, the City of South Bend has provided free internet access through the public South Bend Open Wi- Fi network. Today, over 140 Open Wi-Fi access points provide coverage in commercial and neighborhood corridors, community centers, parks, and public facilities. Nonprofit and community- owned networks are and have been an essential piece of South Bend's digital equity landscape. In addition to ISP partnerships, we strongly encourage IBO to specifically include nonprofit and community-owned networks in its digital equity strategies to ensure that digital equity funding does not omit

this critical tool to bridge the digital divide.

3. Acknowledge the possibility of wireless and spectrum innovation to address the urban digital divide

One of South Bend's advantages is the presence and partnership of the NSF-funded SpectrumX Wireless Innovation Center led by the Notre Dame Wireless Institute, represented within the South Bend Connectivity Coalition. With this asset in our backyard, we are interested in the implications of wireless and spectrum research on real-world applications, such as implementing novel solutions into the neighborhoods of our city to serve residents affected by the digital divide. One example of this use case would be the launch of Spectrum X-backed wireless internet service providers (WISPs) in partnership with our local dark fiber network provider, ChoiceLight, to offer additional layers of connectivity options for residents and businesses.

Our local CBRS private LTE network is another example of an innovative wireless solution to increase connectivity options for families. We request that IBO include research-based wireless partnerships in its vision of "innovative ways to provide connectivity" (Objective 1.1.8), especially those led by community organizations, research institutions, and/or local governments.

4. Prioritize broadband performance measurement as an ongoing digital equity strategy

As Indiana invests in the infrastructure, skills, devices, and ecosystems necessary to get all Hoosiers online, it is increasingly critical to understand the levels of broadband performance as experienced by consumers. With accurate, on the ground measurements, we can ensure that ISPs are providing the best possible service to their customers, consumers are receiving the service they are paying for, and our communities are effectively making progress in bridging the digital divide with sufficient speeds and reliability.

In South Bend, innovative projects have provided valuable insights into the internet speeds and latency our residents are seeing. In 2022, the City of South Bend and the Notre Dame Wireless Institute deployed mobile phones on solid waste vehicles to measure mobile data speeds citywide. Currently, the Wireless Institute is deploying sensors to measure home broadband speeds and comparing the results to those from crowdsourced speed tests. We encourage IBO to prioritize these types of projects in the state Digital Equity Plan and in capacity grant funding. Moreover, we ask that IBO partner with communities to integrate effective and innovative broadband measurement projects into statewide broadband policies and practices (e.g., future grant funding, broadband mapping, etc.).

5. Address the value of longstanding strategies to boost community connectivity

We in South Bend have actively supported innovative partnerships to provide community connectivity, including the launch of our CBRS private LTE network for student use. Projects like these are critical to advancing digital equity and wireless innovation. However, our community has also seen the value of more traditional strategies to provide connectivity to the public, including mesh open wi-fi networks using fiber backhaul. In South Bend, the South Bend Open Wi-Fi network provides free public access at over 140 sites citywide. While the network's architecture is more traditional than other novel connectivity approaches, Open Wi-Fi provides an essential resource for our residents without reliable

internet access.

While we support the Digital Equity Plan's focus on "innovative ways to provide connectivity"

(Objective 1.1.8), we encourage IBO to acknowledge the value of traditional tools like public wi-fi networks in its objectives and facilitate additional investment in these tools with coming digital equity funding.

Thank you for your consideration of our comments. We look forward to continuing this important conversation, and are excited to participate in statewide digital equity coalition partnerships as they emerge.

Sincerely,

South Bend Connectivity Coalition connectivity@southbendin.gov www.ConnectSB.org "

Indiana Comment #15 Response:

Thank you for your public comment we received on 2/7/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment

Comment #16

Received on 2/9/2024 SWaddle@aarp.org–
Sarah Waddle – State Director, AARP

"Indiana Broadband Office

Re: Comments on Draft Digital Equity Plan

To Whom it May Concern:

Comments on Introduction and Plan Creation

AARP appreciates the opportunity to comment on Indiana's Draft Digital Equity Plan ("Plan"). These comments reflect in part AARP's perspective based on its countless years of experience advocating for older adults on many issues, including reliable, affordable high-speed internet access, as well as its review of the draft digital equity plans of 50 other states.

AARP commends the Plan's comprehensive discussion and analysis of the challenges to and benefits from achieving digital equity, as well as for a thoughtful and clearly articulated roadmap for narrowing digital disparities in Indiana. The Plan reflects extensive data analysis, as well as extensive stakeholder outreach and engagement. The Introduction and Plan Creation sections provide important context for readers to understand how and why the Plan was developed. AARP appreciates being recognized in the Plan as a statewide digital equity task force contributor.

AARP recommends the final Plan expand the Introduction and Plan Creation sections to include short summaries of other core Plan components to create an Executive Summary. Providing a short overview of the entire document will greatly benefit readers who do not have time to read the entire Plan. AARP commends Indiana for making the Plan available in Spanish. One of the eight "covered populations" under the Digital Equity Act are individuals with a language barrier and over 16% of the state's survey respondents indicated they spoke a language other than English at home. It is for this reason, AARP is also hopeful that the website will provide an easy-to-use link for those lacking English proficiency to connect to information about and during the state's implementation of the Plan. AARP is also hopeful that any surveys and outreach conducted during the Plan's implementation will be conducted not only in English, but in other languages as well.

Comments on Current State of Digital Equity

AARP appreciates Indiana's comprehensive data gathering and community engagement efforts. Indiana is commended for developing a novel approach to developing and conducting a statewide survey in which 379 of the 1,225 respondents were aged 60 or older. The survey, coupled with task force contributions, key informant interviews of 12 older adults who have experienced digital inequities, and seven regional solution sessions offers an even richer look at the needs of this population. AARP is hopeful that Indiana continues to invest sufficient resources to sustain this level of engagement throughout implementation, including ongoing in-person solicitation from populations not using the internet.

AARP greatly appreciates the consideration of determinants that may influence a person's ability to connect and adopt the internet and technology, as shown in Figure 4 – "2021 Public Transit Stops and the Digital Divide, Marion County, IN." Similarly, Figure 5. "Summary of Digital Assets Per OCRA Region" is a helpful addition to Indiana's draft plan. This visual could be elevated by layering covered population density within the map.

AARP highly commends the development of Indiana's digital equity dashboard, which features a group of 19 variables that will be monitored to gauge the state's digital equity landscape during the next five years. The dashboard will be an invaluable tool to monitor progress and ensure scarce digital equity funds are effectively invested. AARP has been a long supporter of data-driven policymaking. AARP is hopeful Indiana will consider expanding the dashboard concept to monitor broad measures of high-speed internet availability, affordability (speeds, prices), and adoption (numbers of subscribers, if possible, disaggregated by covered population and geography). This expanded dashboard could include aggregated metrics to track general trends and maps to display information visually on an ongoing basis. The dashboard could also capture and share program-level best practices from across the state.

Indiana could tap into academic partnerships across the state to bring GIS, statistical, and other skills to the state's efforts to identify gaps in digital equity and to monitor its success in closing those gaps. Making this information readily available to all can help community-based organizations and all members of the digital ecosystem tailor programs and adopt best practices. Moreover, this data and information sharing will show industry, philanthropy, and government that each will reap the benefits of investment in digital equity programs.

AARP appreciates the Plan's comprehensive inventory of assets across Indiana that promote digital equity. Indiana has an impressive foundation to support its continuing efforts to close digital gaps. AARP requests that Older Adults Technology Services (OATS) from AARP is included as an asset in the final Plan. OATS' technology program for older adults, "Senior Planet from AARP," is available to older adults in Indiana. Senior Planet is designed to help older adults aged 60 and older thrive in the digital world and harnesses technology to change the way we age. Senior Planet operates virtually via SeniorPlanet.org and hosts a National Tech Hotline: 888-713-3495, which is monitored by Senior Planet Trainers from 9am – 5pm EDT, Monday through Friday.

AARP is hopeful that Indiana updates and publicizes these inventories to inform best practices throughout the state and considers making some of the information available in languages in addition to English.

The barriers the Plan identifies on page 28 are grounded in core elements of digital inclusion. AARP suggests it might be clearer to Plan readers if availability, affordability, digital skills development were explicitly stated as "bucket" names, rather than collapsed into broader buckets.

The Digital Equity Plan

AARP supports Indiana's vision for digital equity: "Indiana residents trust and use innovative connectivity for improved quality of life, resulting in inclusive and resilient communities that ensure opportunities for all." This is a robust, outcome-based vision that contemplates continual digital equity progress.

AARP recommends the final Plan explore how proposed actions will impact and interact with the state's:

1. economic and workforce development goals, plans, and outcomes
2. educational outcomes
3. health outcomes
4. civic and social engagement, and
5. delivery of other essential services.

Better connectivity will enhance workforce development and economic growth outcomes in the state. While older adults may be exiting the workforce more than other covered populations, AARP is hopeful the final Plan will acknowledge the need for upskilling or learning technology to supplement retirement/inflexible income through entrepreneurship. AARP research has shown small businesses are an important source of jobs for older workers. Please find additional information from employment and older workers by clicking the link below:

• https://www.aarp.org/content/dam/aarp/ppi/2023/4/us-small-business-employment-and-older-workers.doi.10.26419-2fppi.00190.001.pdf

Digital equity will positively impact educational outcomes in the state. AARP notes that expanded educational opportunities facilitated by greater connectivity can yield personal growth and career advancement benefits for older adults in Indiana. Increased access to education opportunities allows older adults to learn a new talent or skill, start a secondary

career, and meet like-minded people. Educational outcomes can help older adults maintain their independence, preserve their dignity, and have a positive attitude toward aging.

Health outcomes will improve with better connectivity. As people age, doctor appointments become a bigger part of life. Being responsible for driving a loved one to several appointments a week or to specialists dozens of miles away can pose a challenge. The hours spent on the road and in waiting rooms add up fast. Telehealth can assist older adults age in place safely and obtain access to state-of-the-art health care. AARP is hopeful that the implementation phase of the Plan will emphasize assisting older adults connecting to health care.

Better digital connectivity will enhance the civic and social engagement of older adults in Indiana by reducing social isolation. For more information see:

• https://www.nytimes.com/2023/09/06/opinion/loneliness-epidemic-solutions.html

• https://www.nytimes.com/2023/04/30/opinion/loneliness-epidemic-america.html

• https://www.nia.nih.gov/news/social-isolation-loneliness-older-people-pose-health-risks

Successful digital equity efforts will expand older adult access to essential services. Particular needs include accessing government programs, telehealth services, digital literacy, and devices to connect them to other support services. Public libraries play an important role in older adults in Indiana accessing these essential services and AARP supports efforts to ensure these pillars of the digital equity ecosystem are adequately funded.

AARP suggests the final Plan include clear measurable objectives (including short, medium, and long-term KPI's - using outcomes, when possible) for documenting and promoting, among each covered population located in the state:

• the availability of, and affordability of access to, fixed and wireless broadband technology

• the online accessibility and inclusivity of public resources and services

• digital literacy

• awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and

• the availability and affordability of consumer devices and technical support for those devices.

AARP is hopeful the final Plan will tie these covered population-specific actions back to covered population-specific needs assessment findings and anchor them to a quantified baseline for each.

Goal 1: Provide Indiana residents with universal connectivity that is affordable, accessible, reliable, equitable and available in public and private spaces to ensure maximum adoption.

Affordability remains a key barrier preventing older adults from getting online. Many older adults have inflexible incomes with Social Security being the primary source of income. When adding car or transportation costs, groceries, health and medical costs, and other living expenses, it can be difficult for older residents to manage an additional bill for broadband.

Affordability as a barrier for older adults is further evidenced by Affordable Connectivity Program (ACP) participation within the state. Nearly 41% of all ACP enrollees in Indiana are households with a resident 50 or older (162,000 households). AARP is actively engaged in advocating for continued funding for the ACP or a successor program and welcomes the opportunity to work with Indiana and other partners to increase participation.

AARP commends the Plan, in Objectives 1.1.3 and 1.2.2, for attempting to address affordability from different angles. AARP proposes the following additions to the final Plan to address affordability and the platform that households use to access the internet:

• The Plan could specify that affordability will be a primary criterion for Indiana selection of BEAD subgrantees. The extent to which BEAD recipients offer and publicize affordable low-income and middle-income high-speed internet access services is a critically important factor contributing to progress toward digital equity. In the same vein, AARP recommends that Indiana consider the extent to which BEAD recipients, and indeed, all service providers offer unbundled high-speed internet access.

• The Plan could observe that municipally owned and operated networks can lead to more affordable high-speed internet services than those offered by for-profit companies.

• Goal 1 could include an objective related to transparency in pricing. Costs of internet subscriptions vary widely, and many users subscribe to bundled services that include television and phone lines along with their internet. The price variations and bundled costs can make it hard to know exactly what a customer is paying for. Promotional pricing and added fees can be a further challenge. Discounted rates are often offered to new customers over a one or two-year period, but rates can jump quickly afterward and catch customers by surprise. Fees associated with installation and equipment, including routers, can also be a deterrent. In 2023, the FCC adopted new rules requiring ISPs to show easy-to-understand labels allowing consumers to shop for the best options and compare plans across ISPs. AARP suggests this new, additional price transparency strategy promote these new broadband labels, at a minimum.

AARP supports an additional Objective within Goal 1 that directs action toward improving internet reliability within the state. Older adults, especially in rural areas, may experience slow speeds that struggle to upload or download items. Completing online job or government benefit applications or ordering something through an e-commerce platform creates a challenge, especially when the internet service times out. (Internet reliability is also a significant challenge for educators, institutions, and students. Additionally, it affects employers, businesses, and the agriculture sector.)

AARP supports the Objectives within Strategy 1.3. Please consider including quality indicators into the database of available broadband (e.g. highlighting providers offering a low-cost option, complaint to customer ratio, etc.).

Goal 2: Ensure all Indiana residents have access to affordable devices needed to live, work, and thrive along with the education to utilize that technology safely and successfully.

AARP supports efforts to ensure that older adults in Indiana have the right tools to get online. We commend Objective 2.1.5 and the creation of community-based Tech Hubs. We do caution this approach as transportation to locations, especially in rural part of the state can be a challenge for older adults. We also commend the commitment to collect and

publish best practices through a community of practice. We encourage Indiana to make these best practices publicly available for all stakeholders.

AARP commends Objective 2.1.6 in developing device refurbishing skills. However, we caution Indiana from relying on an ecosystem of used devices and device loan programs as an avenue for getting devices to people. Used devices can often provide a subpar experience and can be a detriment to overall digital skill adoption as they may require additional maintenance or no longer offer updates/security patches. Device loans may hinder the individual from practicing skills acquired in digital skills programs.

Goal 2, Objective 2.1.1 is thoughtful in its intentions to include "peripheral devices (such as printers and assistive devices, microphones, etc.) necessary for full participation in the digital economy." This is an important consideration, especially as individuals seek support with digital skills for the workforce, need support applying for public benefits and general technology use.

AARP commends the commitment to educational resources and programs that equip consumers to make educated device purchases and build awareness about the importance of quality device ownership. We recommend ensuring these programs are differentiated based on the covered population and are culturally competent in their design.

Goal 3: Build digitally resilient and equitable communities by supporting new and existing ecosystems for local prosperity.

AARP highly commends Goal 3. By placing a high emphasis on fostering successful partnerships, building local capacity, and strengthening the digital equity ecosystem, on-the-ground practitioners and providers who deliver resources and services will have the support needed to sustain digital equity efforts beyond the five-year funding of the Digital Equity Act. We believe storytelling and outreach campaigns can build a strong foundation for digital equity in communities with limited trust or where there is hesitation to learn new technologies. We welcome the addition of Objective 3.1.2 "Invest in storytelling to secure community buy in…" under Goal 3 of the Plan. Please ensure aging individuals that have lived experience with technology are tapped to support Objective 3.1.2.

Too often, the communities and residents of covered populations have been left behind, which creates a justified skepticism of trust, especially regarding government programs. Smaller, community-based organizations are considered some of the most trustworthy by covered populations. To make digital equity funds more accessible to these small, trusted organizations, Indiana should consider dedicating a portion of funding and provide enhanced grant technical support to assist small organizational subgrantees. The final Plan could also create and include a Digital Equity Readiness checklist for communities to equip them to apply for Digital Equity Act funds. The checklist could mirror the "broadband ready" checklist from the Broadband, Equity, Affordability, and Deployment (BEAD) requirements.

AARP supports Strategy 3.4 to equip residents to participate in the digital world safely and prosperously. As technology rapidly changes, diverse, low-cost, and free digital skills training must be readily available to all residents in Indiana. For older adults, the need for digital proficiencies ranges from basic knowledge to operate a computer, create an email account, and connect a printer; to more advanced assistance navigating online portals and learning common software that contribute to economic, health care, and social engagement opportunities.

Internet access offers numerous opportunities but comes with significant risks. It is convenient to check bank statements, register for classes, or sign up for a telehealth portal in today's digital world. However, the ease of access also increases the potential for personally identifiable information to be stolen, for users to be scammed, and for misinformation to spread. AARP supports efforts to increase awareness and adoption of internet privacy and security practices by older adults in Indiana. Trust and privacy concerns remain a barrier preventing older adults from adopting broadband and new technology. A recent AARP survey (Tech Trends 2023) found that 18% of survey respondents expressed concern about trust and privacy. AARP maintains that older adults' lack of digital literacy and gaps in digital skills exacerbate fears about online safety and privacy, making some more reluctant to obtain home access to high-speed internet. Digital know-how, comfort using new technologies and applications, and having the skills to protect one's privacy are inter-related and critically important to older adults. Moreover, aging individuals are especially susceptible to scams and are concerned about their privacy being jeopardized. For example, a recent Pew Report states: "Two-thirds (67%) of adults say they understand little to nothing about what companies are doing with their personal data, up from 59%." The Report also states: "About seven-in-ten Americans are overwhelmed by the number of passwords they have to remember. And nearly half (45%) report feeling anxious about whether their passwords are strong and secure." AARP suggests the final Plan include a KPI that measures covered populations' level of confidence in safely navigating identified activities on the internet. AARP suggests Objective 3.4.2 and/or 3.4.4 be expanded to include an ongoing statewide cybersecurity awareness campaign, as this is a key component of earning the trust of community members. Please use people with lived experience as ambassadors of the campaign.

AARP supports Strategy 3.5 to build a central location for digital equity resources and programs. The community of collaboration digital equity organizations will greatly benefit by the identification of best practices and sharing of data and lessons learned. As mentioned above, AARP is hopeful Indiana will consider expanding the Plan's dashboard concept to monitor broad measures of high-speed internet availability, affordability (speeds, prices), and adoption (numbers of subscribers, if possible, disaggregated by covered population and geography). This expanded dashboard could include aggregated metrics to track general trends and maps to display information visually on an ongoing basis and will benefit the digital equity ecosystem.

Moving Forward - Implementation

The Plan's approach to implementation fits together well with the assets and barriers identified and builds off the partnerships and relationships described. Many elements of the plans for implementation appear ambitious yet pragmatic.

AARP supports the Plan's five overarching implementation strategies:

1. Develop, support, and coordinate state, regional, and local digital equity coalitions

2. Collaborate with existing organizations to achieve objectives

3. Coordinate with BEAD implementation and other state digital equity or broadband initiatives

4. Develop necessary programmatic infrastructure for evaluation

5. Continue to document Digital Equity needs and update the plan

AARP fully supports data-driven, informed policymaking, the sharing of best practices, reliance on the resources and skills of academic institutions, accountability, transparency, and collaboration. AARP commends the Plan committing to developing a comprehensive evaluation strategy that features project specific evaluation and impact evaluation. Impact evaluation has great potential to measure social, health, and financial outcomes for covered populations. For example, outcome-based evaluation measures for digital skills development could result in the creation of a post skills training questionnaire with questions/statements like, "as a result of this class, I have adopted at least one practice to improve my health (such as visiting a doctor, improving my diet, or managing my medications)."

As part of Indiana's system for measuring outcomes and plan progress, AARP is hopeful that the Plan will:

Commit to regularly collect, analyze, and report internet access adoption and deployment, by technology and speed, at a geographically granular level so that Indiana can monitor the extent to which some communities and some populations may be relying on inferior high-speed internet access.

• Commit, if and as needed, to seek legislative authority to require providers to submit data to assist with the implementation and assessment of the progress of the Plan (e.g., regarding deployment, prices, adoption, speeds, and technology). AARP has engaged in state legislative high-speed internet access advocacy in many jurisdictions throughout the country and is fully prepared to assist with legislative advocacy that would facilitate the division's achievement of digital equity.

To encourage older adults to get online, AARP is hopeful the final Plan will also:

• Commit to provide sufficient resources to senior centers, Area Agencies on Aging, and other organizations that work with aging individuals so that Indiana can successfully close age-based digital equity gaps. Also, AARP is hopeful the Plan will commit, where needed, to bring digital equity solutions to where people live – not all aging individuals can travel, for example, to senior centers, libraries and community centers for digital literacy training.

• Recognize that aging individuals include people with a wide range of abilities and potential to navigate high-speed internet access applications. Nonetheless, a high-speed internet connection can enhance the lives of all, even those who are not able to tap into internet-based applications without real-time assistance. For that reason, the Plan could acknowledge that high-speed internet access adoption and literacy training programs should also include caregivers. Caregivers can in, in turn, facilitate aging individuals' digital connections (e.g., videoconferencing with their grandchildren, getting remote health care, watching a movie, etc.) Not all aging individuals, even with training, will be able to navigate internet-based applications on their own, yet they can still benefit from having access to internet-based applications in real time, trained through facilitation by their caregivers..

Conclusion

AARP welcomes the opportunity to work with the Indiana Broadband Office and other key stakeholders to help Indiana make progress toward its ambitious digital equity goals. Aging individuals overlap with other covered populations -- AARP is fully prepared to partner with

other organizations and community-based groups to contribute to achieving digital equity for all. AARP commends Indiana on its Draft Digital Equity Plan and respectfully requests consideration of suggestions contained herein be incorporated into the final Plan.

Indiana Comment #16 Response:

Thank you for your public comment we received on 2/9/2024. We appreciate your participation in this process and will consider your response as we edit the draft Digital Equity plan.

Thank you – Indiana Broadband Office – IBO Public Comment