July 26, 2023

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National Telecommunications and Information Administration
1401 Constitution Avenue NW, Suite 4725
Washington, DC 20230

Submitted via email to rgoldberg@ntia.gov

Reference: Federal Register Notice June 2, 2023, Request for Comment--NTIA Internet Use Survey

　　　　　OMB Control Number 0660-0021

Dear Mr. Goldberg:

The National Association of State Directors of Adult Education (NASDAE) is the membership association for the state administrators of Title II Adult Education and Family Literacy Act (AEFLA) funding from the Workforce Innovation and Opportunity Act (WIOA.) Our programs are on the front lines of providing digital literacy and digital skills instruction to the over 1 million adult learners we served in 2022-23, many of whom make up the "covered populations" under the federal Digital Equity Act. However, currently we are unable to substantiate our students' strengths or needs as we have no formally approved digital skills assessment at the national level.

For this reason, **The NTIA Internet Use Survey is a unique and invaluable source** of data about US residents' digital access and adoption.[1] The federal government is the sole source of statistically representative, rigorous information on this topic, which is of profound importance to adult education providers. No other data collection effort or vendor even comes close.

Furthermore, it is not just our students who need the representation afforded by the Survey. **Program faculty and staff are equally expressing the need to acquire/hone digital skills**, build their digital resilience, afford broadband at home for remote teaching, etc. Our programs made a remarkable shift in the early pandemic era to remote-based instruction and services, and what exists today is an evolving blend of old and new modalities. We know that our students need better access, better devices, and more skills in accessing and using technology in order to meet their learning and workforce goals; we similarly want to highlight and advocate for the teachers and staff who require the same level of high-speed access, upgraded tools, and skills in order to provide these services effectively moving forward.

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[1] Also referred to as the Current Population Survey (CPS) Computer and Internet Use Supplement.

For these reasons, **it is crucial to ensure that the next iteration of the survey responds to critical shifts in the US economy and labor market** that have been underway since the survey was last carried out in 2021. In the past several years, the world has changed dramatically. In particular, the continuing Covid pandemic has rapidly created ***new digital skill demands***: Parents suddenly need digital skills to oversee their children's K-12 education, elders and rural residents need skills to receive vital telehealth services, and workers of every age need skills to stay employed as their jobs transform to require new technology skills and capacities.

Indeed, research from National Skills Coalition has documented that [92 percent of jobs](#) now require digital skills. Significantly, this demand is just as high for entry-level jobs – those that require a high school diploma or just 0-2 years of experience – as it is for more white-collar occupations.[2] This massive transformation in the US labor market has profound implications for individuals of all backgrounds, including those named as "covered populations" under the federal Digital Equity Act. In particular, being able to identify *where there are significant digital skills barriers and needs within US communities* is absolutely vital to targeting investments and interventions, and ultimately to ensuring that people have the skills they need to survive and flourish.

But data gathering on digital <u>*skills*</u> has not kept up. Neither the federal government nor states, localities, or the private sector have been gathering the type of baseline information about Americans' digital skills that is vital to informing workforce and education policies, including the allocation and access to billions of dollars of investment that will flow to states over the next five years thanks to the Infrastructure Investment and Jobs Act. While data on high-speed internet access and digital devices is of course crucial, we urge NTIA to ensure that the 2023 iteration of the Internet Use Survey also captures specific, focused data on digital *skills.*

To that end, we make the following recommendations:

- **We support NTIA's proposal to ask respondents about specific tasks** they may carry out using digital technologies (pages 7-9 of the [proposed questions](#)). This is a useful proxy measure to help gauge whether people are (or are not) equipped to use computers and other digital tools to accomplish key activities of daily life, including those that are vital to health, well-being, and economic stability.

- **We strongly recommend that NTIA add 3 questions pertaining to education and employment**. The survey already (appropriately) includes three targeted questions focused on health. Economic stability is equally crucial to individuals' and families' well-being, and for that reason we think it is well worth adding a handful of targeted questions on that topic. We propose specific questions below:

   - ***Education/workforce Q1:*** In the past 12 months, have difficulties in using a computer or other technology that requires digital skills stopped you from applying for a job offer or promotion? (YES/NO)

- *Education/workforce Q2:* In the past 12 months, has there been a work task or responsibility that you were unable to complete because of difficulties in using a computer or other technology that requires digital skills? (YES/NO)
- *Education/workforce Q3:* In the past 12 months, has there been an educational or learning opportunity that you were not able to participate in because of difficulties in using a computer or other technology that requires digital skills? (YES/NO)

(If there is room in the survey, we would also suggest asking an additional set of three questions, similar to the three above except focusing on "problems with internet access." But we recognize that NTIA is juggling many competing demands for data, and we recommend the above questions as the *highest* priority.)

- **We strongly recommend that NTIA add a question probing who people turn to *when they do not know how* to do a digital task.** See example below.
  - **Question**: Thinking of the _most recent time_ that you needed help using a computer or another digital device (such as a smartphone) to complete a task, where did you turn to for help? (CHOOSE ONE)
    - I figured it out by myself
    - Online tutorials or videos
    - Friend or family member
    - Co-worker or supervisor
    - Community institution such as a school, library, or religious organization
    - Business help desk (such as Best Buy's Geek Squad or Apple's Genius Bar)
    - Other *(record verbatim answer)*
    - Don't know/I can't remember needing help

We appreciate NTIA's careful attention to these important issues, and stand ready to discuss any of our recommendations in more detail at your convenience. Thank you in advance for your consideration.

Sincerely,

Patricia H. Tyler
Executive Director