

July 27, 2023

Attention: Rafi Goldberg
Senior Policy Advisor, Digital Equity
National Telecommunications and Information Administration
1401 Constitution Avenue NW, Suite 4725
Washington, DC 20230
Submitted via email: rgoldberg@ntia.gov
Reg. OMB Control Number 0660-0021

Dear Mr. Goldberg:

World Education (WE) - a division of JSI - appreciates the opportunity to provide comments to the National Telecommunications and Information Administration (NTIA) request for comment on Internet Use Survey (Document Number: 2023-11726). Included in this letter are our comments on the RFC outlined in accordance with the questions posed.

Our response is based on our vast experience developing models and products for closing digital skill gaps and our commitment to literacy. We are leaders at leveraging technology effectively and equitably to increase impact and opportunity. Our perspective reflects our belief that everyone has the right to high-quality education and economic opportunity. We also have the unique perspective of advocating for the meaningful inclusion of adult learners, especially individuals with a language barrier, in states' Digital Equity Act work through our [Transforming Immigrant Digital Equity](#) project: over the past year, we have developed a number of resources to support adult education leaders and advocates' efforts in ensuring State Digital Equity Plans will successfully address our learners' needs and barriers.

Your investment in this issue shows the willingness of the NTIA to invest in a critical issue that is ever evolving and impacting the lives and determining the future of every American. Thank you for this opportunity to respond.

Please address any inquiries related to this letter to me.

Regards,



Priyanka Sharma

PRIYANKA SHARMA | VICE PRESIDENT, US

WORLD EDUCATION

www.worlded.org

NTIA Internet Use Survey

ABOUT WORLD EDUCATION

World Education (WE), a division of JSI, is a global nonprofit organization headquartered in Boston that advances equity and opportunity by improving the quality and accessibility of education for children and adults. WE is a leader in providing capacity-building services to adult education and workforce development systems in all 50 U.S. states through innovative demonstration projects, professional development, research, and targeted technical assistance.

Founded in 2015, World Education's award-winning EdTech Center (ETC) advances digital equity to enable everyone to thrive as learners, workers, and family and community members in the digital world. Our staff and global network of partners are experts on digital learning and lead diverse projects both in the U.S. and internationally. The EdTech Center's digital learning and educational technology (EdTech) integration work is informed and guided by a radical commitment to equity, accessibility, excellence, open access, and collaboration.

Informed by this work and our expertise, our comments below reflect our belief that language access, language literacy, and digital literacy need to be meaningfully addressed in the approach for data collection in the implementation of your Internet Use Survey.

COMMENT

We have targeted our response to align with your request for comment in the following questions:

- Evaluate the accuracy of our estimate of the time and cost burden for this proposed collection, including the validity of the methodology and assumptions used;
- Evaluate ways to enhance the quality, utility, and clarity of the information to be collected; and
- Minimize the reporting burden on those who are to respond, including via the use of automated collection techniques or other forms of information technology.

Our comments are subsequently grouped by category and alignment with accessibility and language access considerations.

Enhancing quality, utility, and clarity of the information to be collected

We express our concerns regarding the accessibility of the content and utilization of the proposed Internet Use Survey, especially for individuals with a language barrier (inclusive of English learners and individuals with low levels of literacy) and individuals with disabilities. We note that NTIA plans to use this data to inform the State Digital Equity Capacity Grant Program. Thus, the data collection tool and any collection techniques used must be accessible

to all individuals who are members of the Covered Populations named under the Digital Equity Act. If members of Covered Populations¹ are unable to participate in the Internet Use Survey, the resulting data will not accurately reflect their numbers and challenges, therefore not providing useful data depicting the needs of these individuals.

In support of our colleagues at the National Skills Coalition we are iterating their suggestion below. Their recent research has documented that 92 percent of jobs² now require digital skills. 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 occupations³. This massive transformation in the U.S. labor market has profound implications for individuals of all backgrounds, including those named as “covered populations” under the Digital Equity Act. In particular, being able to identify *where there are significant digital skills barriers and needs within U.S. communities* is absolutely vital to targeting investments and interventions, and ultimately to ensuring that people have the skills they need to survive and flourish. 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 enhance the quality and utility of the information to be collected, we recommend:

- The addition of the following three questions pertaining to education and employment. The survey already 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.”)

¹ <https://broadbandusa.ntia.doc.gov/sites/default/files/2022-06/DE-FAQs.pdf>

² <https://nationalskillscoalition.org/resource/publications/closing-the-digital-skill-divide/>

³ *Closing the Digital Skill Divide* (National Skills Coalition, 2023).

- The addition of 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

Accessibility for individuals with a language barrier

One in five, or 43 million adults, in the United States possess low literacy skills, and a plurality of this population lack the language or cognitive skills to answer basic survey questions.⁴ We note two significant challenges to accessibility for individuals with a language barrier:

1. The complexity of the English language used in the proposed Internet Use Survey
2. The absence of non-English options in both the survey itself and the means in which the survey is to be administered

We offer the following recommendations to improve accessibility for those with a language barrier:

- Rewrite the device- and Internet-related definitions in the survey in plain English, and/or include non-ambiguous images of the items being defined where possible;
- Provide high-quality translation of the Internet Use Survey in commonly used languages other than English;
- Ensure that staff responsible for administering the survey are fluent in the language(s) commonly used in the communities in which they are administering the survey;
- Ensure that terms such as “home Wi-Fi routers” are clearly defined and comprehensible to individuals with limited familiarity with technology, individuals with limited ability to distinguish the item from a similar item (i.e. in this case, a modem), and/or individuals with other language barriers; and/or
- Add an “I don’t know” response option to questions such as HOMTE and USEINT, where a respondent may not have the knowledge and/or vocabulary needed to understand and accurately respond to the question.

⁴ <https://nces.ed.gov/pubs2019/2019179/index.asp>

Accessibility for individuals with disabilities

We note the following significant challenge for survey respondents who are visually and/or hearing impaired: a lack of guidance in the Interviewer Manual for interviewing individuals with disabilities.

We offer the following recommendations to improve accessibility for individuals with visual and/or hearing impairment:

- Ensure that accommodations are offered to individuals with visual and/or hearing impairment;
- Ensure interviewers have specific guidance in the Interviewer's Manual on how to interview individuals with visual and/or hearing impairments; and/or
- Ensure that survey respondents have access to assistive technology when the interview is conducted in-person and on the phone.

Time commitment and method of delivery

The stated expected time for completion of the Internet Use Survey is 10 minutes. When interviewing individuals with English language barriers, individuals with low literacy, and individuals with disabilities, this time commitment may not be an accurate reflection of the needed time. Without the provision of language access and accommodations, the burden on respondents is high and may result in decreased involvement of individuals within these covered populations. In terms of the method of delivery, we would like to note that it is common that individuals will not open the door to strangers, so alternative modalities such as integrating local community organizations to support the provision of the survey may reduce the concern of opening the door to a stranger and can provide the potential of adapting the survey to the individual's primary language.

WE thanks the NTIA for this opportunity to comment and welcomes the opportunity to discuss our comment and perspective further.

CONTACTS

Priyanka Sharma
Vice President - US
priyanka_sharma@worlded.org

Jamie Harris
Senior Technical Advisor
jamie_harris@worlded.org



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