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WASHINGTON STATE DEPARTMENT OF COMMERCE

Comments to WA Commerce Digital Equity Plan

Washington State Department of Commerce
Washington State Broadband Office
2001 6ᵗʰ Avenue, Suite #2600
Seattle, WA 98121

InternetForAll@Commerce.wa.gov

RE: Comments on Draft Washington State Digital Equity Plan

Dear Sir or Madam,

We appreciate the opportunity to submit comments and feedback regarding the State's (Draft) Digital Equity Plan. The intention of this letter is to briefly summarize the feedback we provided through the online comment forum, a pdf of which is attached here for reference.

First and foremost, we wish to earnestly commend the Broadband Office (WSBO) and the Department of Commerce for its well-planned, comprehensive, and multi-pronged approach to address digital equity for all residents. The Digital Equity Plan prepared by WSBO is thorough, integrative, and compelling. As a Washington-based firm with expertise in healthcare and the design and implementation of community-based health-related social needs services and partnerships, we have closely followed the Broadband Office's efforts in this initiative and often cite it as an example of effective inter-agency coordination and impact.

Given our experience in community-based outreach and network development our feedback primarily focuses on community representation, engagement, and the delivery of digital navigation services (Digital Navigator Program). Our primary recommendations and feedback are listed below:

- Strategic partnerships with community-based organizations are important in order to expand the reach, penetration, and sustainability of digital navigation services by Community Anchor Institutions (CAI). We encourage WSBO to enhance its guidance to CAIs and other partners regarding how these community partnerships are developed and maintained. In any initiative involving community engagement, there must be feasible, objective and measurable goals identified to direct implementation and measure the effectiveness of activities. We recommend that WSBO focus on the effectiveness of community partnerships as a measured outcome across CAIs.

- The Washington Benefits Health Exchange (WAHBE), and specifically their Lead Navigator Organizations and outreach efforts, represents a potential

partner and resource for WSBO and the Digital Equity Plan, particularly as WAHBE seeks to conduct outreach to immigrant populations who have previously been excluded from the Affordable Care Act marketplace and publicly-subsidized health insurance.

- Regarding Strategy 5 (Promote Practices and Tools to Ensure Online Privacy and Security) we recommend that WSBO (or a subcontracted partner) develop training or outreach resources that can serve as a centralized library which Digital Navigator partners can draw upon. Centralization of resources will reduce duplication of effort across organizations and give partners a "starting place" which they can adapt for their own outreach.

- Regarding Health Outcomes as an intersecting State objective, we encourage WSBO to not just measure *access* to telehealth services but also (1) utilization and (2) patient satisfaction or perception of usability. We also noted that the Health outcomes section (p 25) would benefit from having the same kind of specific goals or governing principles driving implementation as is featured in other domains (specifically as featured in the sections dedicated to Economic Workforce Development, Educational Outcomes, and Civic Engagement).

If there is one theme or takeaway that we would like to stress, it is the importance of leveraging the reach and impact of the Community Anchor Institutions (libraries, health centers, public schools). The Community Anchor Institutions identified through this Plan are well thought out and represent essential public forums and institutions. However, while most residents naturally intersect with some or all of these anchor organizations, to increase penetration into specific communities and populations it will be important that these anchor organizations *also* partner with other community-based organizations. WSBO can help these anchor institutions do that by continuing to provide, and expanding upon its guidance for how it will evaluate (1) the development and maintenance of community partnerships and (2) penetration and impact in target communities, particularly those communities that historically have been most often overlooked or experience the greatest barriers to accessing public resources.

Sincerely,

Tina Simpson, JD, MSPH
Principal Consultant
Atrómitos, LLC

Please let us know if you have any questions or comments on the DRAFT Washington State Digital Equity Plan. Identifying information is optional but can be included if you would like to receive updates. You can skip any of the questions and just provide general feedback if you prefer.

(Optional) What is your name (first and last)?
Tina Simpson

(Optional) What is your email address?
Tina@Atromitosconsulting.com

(Optional) If you are commenting on behalf of an organization, what is the name of your organization?
Atrómitos, LLC

(Optional) What is your title?
Principal Consultant

(Optional) What is your zip code?
98006

Do you have any comments on the overall vision and goals for digital equity? (Please note if there is a specific page number)
The overall vision, goals, and the three governing principles or pillars (Access, Affordability, and Adoption) are comprehensive, concrete, and measurable.   Each of the three goals (Eliminating Barriers, Empowering Residents, and Ensuring Sustainability) will require different resources and approaches, a point which is emphasized throughout the Plan. We wanted to stress the central importance of planning for and investing in sustainability planning as it relates to developing and building partnerships for community learning and engagement, particularly in under-resourced communities. These programs include the Digital Navigators Program and other outreach efforts to promote digital literacy and technical support. **We encourage the Department to expand upon how it will plan for, measure, and**

evaluate the sustainability of these programs and the sustainability and impact of the partnerships developed.

Of the three goals, sustainability planning is the most "squishy," meaning it is difficult to define, with different stakeholders and partners requiring different kinds of support and incentives. For that reason, it can be the hardest to plan around and implement. It is also the one that needs to be addressed in any development and implementation cycle. Commerce, and specifically the Washington State Broadband Office (WSBO) is positioned to correct this "blind spot" and protect its investment in grantees and other partners by creating, monitoring, and enforcing sustainability planning milestones.

While at this stage of the development and implementation of the Digital Equity Plan, it may not be possible to define *specific* sustainability goals or metrics, it is possible and important to create and communicate a framework that WSBO's partners will use to motivate and drive sustainability planning. This is important for two reasons. **First**, as previously noted, sustainability planning is often overlooked in many initiatives. Knowing this, it is all the more critical that WSBO encourages grantees to engage in creative and actionable long-term planning so that the State's investment in the infrastructure and stakeholders facilitates continued operations with reduced *direct* state support in the future. **To be sustainable**, grantees and other partners in the Digital Navigation Program must be able to identify and develop additional revenue sources or efficiencies to subsidize the delivery of services such that these support services align with a grantee's operations and strategic development.

Sustainability Planning for digital navigation and other community outreach and support services is also important as it impacts **how** WSBO's grantees and partners expand their network and partnerships across targeted communities. We understand from the activities outlined in the logic map (p 11) for Strategy 4 that the next phase of the Digital Navigator initiative involves expanding the program to integrate target populations and the organizations that serve those prioritized populations, including but not limited to Student and Family involvement in digital literacy services. Guidance from the state on its expectations regarding **how** these partnerships are developed and maintained (e.g., ensuring adequate funding for CBO partners and adequate flexibility in how they are delivered) will be important to the success and sustainability of long-term partnerships with community representatives and CBOs. In our experience, in any complex implementation that involves community outreach and engagement, **there must be feasible, objective, and measurable goals to measure the effectiveness of strategic partnerships and the penetration into and across targeted populations and communities**.

Finally, clear communication from the state on the parameters of its expectation as it relates to funding of these services and expectations of partnership with or creation of community consortiums will be necessary for recruiting and retaining service providers and other partners as this is information that prospective community partners will evaluate when considering whether to expand related services (such as establishing a digital literacy or navigator program at a hospital or health center, or as part of outreach services of a CBO serving a specific population). Lack of clarity regarding long-term sustainability (evidenced by the predictability of revenue sources) is frequently cited by CBOs and other organizations as a barrier to adopting new services or innovations.

Are there any additional digital equity resources or programs (assets) that should be included? (Please note if there is a specific page number)

We do not identify any existing **digital equity** resources or programs not included in the Plan. However, there is one state agency with some shared objectives that should be integrated into WSBO's Plan and future planning: the Washington Health Benefits Exchange.

The Washington Health Benefits Exchange (responsible for the administration of the State's health insurance marketplace), specifically its Lead Navigator program, may be an effective prospective partner to WSBO as the two agencies share objectives and challenges related to engagement with some targeted populations. Specifically, under a federal waiver, Washington State is expanding eligibility to participate in the WAHBE ACA marketplace (and to receive free or subsidized coverage) to immigrants previously excluded from these programs by federal law. This population, including refugees and undocumented immigrants, is naturally mistrustful of state agencies and many other institutions; it can be particularly challenging to launch effective outreach and engagement efforts in these communities. WAHBE has undertaken intensive stakeholder engagement to identify barriers that this population may experience to enrolling in health insurance. Those barriers include lack of digital literacy and comfort (in addition to the complexity of health insurance as a product and the process of enrollment). WAHBE utilized a Navigator program across the state to facilitate navigation of the website and enrollment in the marketplace. We understand that WAHBE has or is preparing to expand navigator services to target this newly eligible population. This is also an area where there will be a continuing need as more individuals become aware of this opportunity. We believe there is a significant opportunity to partner with WAHBE to increase penetration into these communities.

Similarly, the ability to navigate WAHBE to enroll and maintain health insurance is another example of digital literacy's impact on health outcomes and an individual's security and civic participation.

Are there any additional needs related to digital equity for your community that should be included? (Please note if there is a specific page number)

We note the relative paucity of digital equity resources specifically targeted to individuals with language barriers, particularly those whose first language is not English. We encourage WSBO to seek to address this gap. As noted above, WAHBE (through its outreach as part of the expansion of Medicaid eligibility and marketplace participation to new populations) could be an important partner in outreach to these communities.

Another important point related to digital literacy and navigation services is having resources and assistance across different modalities, including 1:1, in person, support, and assistance. Effective navigation services are also most effective when there is continuity in support service delivery – meaning that these are not just a one-time interactions, but circumstances where an individual is able to return with additional questions. Reliability and the ease with which an individual can access support is an important consideration in overcoming the frustration and "friction" that many people experience (particularly older residents) who do not have as much knowledge and comfort with digital spaces as others.

Do you have any thoughts to share on the strategies and activities proposed? (Please note if there is a specific page number)

The five proposed strategies are closely tailored to the program's objective and vision of ensuring that all Washington residents have affordable broadband technology and the tools, skills, and confidence to participate in digital society by 2028.

For **Strategy 3** (Consolidate Practices that promote online accessibility and inclusivity) – the assigned activity includes partnership with trusted messenger programs and organizations to disseminate information about available assistance with targeted populations. We believe that this is the correct activity and that effective

partners with organizations trusted by communities will be critical to (1) the overall success and *impact* of the program across communities **and** (2) the sustainability of the resources and infrastructure that WSBO has been building.

Given the importance of this activity, <u>we encourage WSBO to expand its plan for partnering with trusted messenger organizations</u> (Activity 3.1, as described on page 137), as well as its plan to evaluate its online presence's impact and reach (Activity 3.2, Measuring Success for Online Accessibility and Inclusivity).

WSBO has conducted extensive stakeholder engagement through this initiative and is aware of particular disparities across specific populations and communities. The partnership with the Department of Veterans Services (WDVS) is an excellent plan for engaging one population (see page 137). We suggest that WSBO develop and maintain a partnership with at least one organization representing a prioritized population. This planned close collaboration and coordination will also help WSBO to identify "blind spots" – and ensure that materials are culturally and linguistically tailored to specific populations and needs. Secondly, we encourage the Department to not restrict its evaluation of the usability of government websites to **only** online evaluation formats, as otherwise, those populations that lack access to or comfort using digital services will continue to be under-represented.

We particularly want to highlight and apply **Strategy 4,** specifically the planned activity of focusing on expanding community partnerships as part of the Digital Navigation program. Expanding and enhancing community partnerships and engagement is the natural and necessary next step in the program's evolution. We encourage WSBO to proactively provide Digital Navigation grantees and support service contractors and grantees with additional direction related to the Department's expectations associated with establishing these partnerships.

We note this because we have experience working with healthcare providers and centers in implementing health-related social needs interventions. Nationally, the healthcare delivery and support environment remains <u>very</u> siloed. This is often reflected in community outreach conducted by some healthcare providers. Many anchor institutions struggle to establish and <u>maintain</u> partnerships with community-based organizations. This is understandable: healthcare providers have a <u>lot</u> on their plate. The point of the comment is to note that these anchor institutions and partners need greater assistance and guidance from the Department to optimize the reach and impact of their outreach to the community and to sustain those kinds of initiatives. Examples of this kind of direction and support might include outlining to contractors

and grantees (with greater specificity) a framework or governing principles by which programs will be evaluated related to community outreach and penetration. For example, the Department may consider integrating community and strategic partnerships (including but not limited to coalition building) as an output that is measured and evaluated as part of funded programs. With such a requirement, contractors and grantees would need to outline their strategy for identifying, integrating, and evaluating the effectiveness of their outreach to and partnership with organizations outside of their direct control. Requiring contractors and grantees to focus on braiding service delivery with community outreach and coordination with *other* community-based organization can (1) expand the reach of their campaigns overall and (2) be an effective tactic to address disparities in community outreach and engagement (e.g., by expanding penetration into population groups that may not be as well represented within an anchor organization).

Finally, we applaud the inclusion of Strategy 5 (promote practices and tools to ensure online privacy and security) and its activities. In the interests of efficiency, we recommend that the Department (or its subcontractors) develop simplified centralized resources on data privacy and security practices that can constitute a centralized "library" or public resources that Digital Navigator partners can draw upon, adapt and distribute. This will reduce duplication of efforts across Digital Navigation networks while allowing partners the flexibility to adapt or enhance those existing tools. WSBO could also consider existing resources or reach out to national organizations as part of this campaign. The National Cybersecurity Alliance (https://staysafeonline.org/resources/) has a robust library of resources.

Do you have any general questions or comments to share? (Please note if there is a specific page number)

We **sincerely** applaud WSBO and the State of Washington for this well-planned, comprehensive, multi-pronged, and proactive approach to address a challenging disparity in access, affordability, and ability.

Healthcare is our area of expertise, so we wanted to comment on Measuring Digital Equity Success (2.1.1, page 14 and page 25) regarding health outcomes. This Plan focuses on *access* to telehealth services as the initiative's primary objective and result. We believe that this is the correct overall goal as it relates to addressing broadband access and structural barriers to the delivery of telehealth services across the states, however, **we encourage WSBO to not just measure access to telehealth services but also (1) utilization and (2) patient satisfaction with**

usability or accessibility of telehealth resources. While there are significant portions of the state where broadband access and provider adoption of telehealth services are the primary barriers, there are other areas that are less impacted by these environmental barriers where comfort utilizing these resources (whether because of lack of comfort navigating digital spaces or the real or perceived absence of culturally sensitive and linguistically adequate resources).

We also noted that the Health Outcomes section in 2.2.3 (Using the Digital Equity Plan to Further Broader Goals, p 25) is less built out and specific than the other four domains. Other domains (Economic Workforce Development, Educational Outcomes, and Civic Engagement) feature specific goals and/or have defined governing principles that will direct the intersection with Digital Equity. **The section on Health Outcomes lacks a plan on how it will expand telehealth access** (p 25). If expansion of telehealth access (and utilization) is the center point, we recommend that the Department of Health and WSBO begin by (1) benchmarking existing access to telehealth services, (2) identifying other metrics to measure impact, and (3) defining a regular, inter-agency program evaluation plan as it relates to this intersecting

Finally, while we agree that increased telehealth access and utilization is the correct target objective, we encourage WSBO (and partner agencies like the Department of Health) to think "outside of the box" when it comes to how partners seek to advance telehealth utilization and online health resources through digital navigation services and other supports. We have noted (both in our role assisting provider agencies in many different communities and states but also as *patients*) that there is a tendency to focus on digital navigation as it relates to a patient's accessing and using a provider's web portal (as one example). In our experience, this strategy has limited impact, as it is an example where an outreach initiative is driven by the *provider's* interests or operational priorities, <u>as opposed to the motivations and priorities of the end user</u>. In our experience, many stakeholders (including but **not** limited to provider practices) require this kind of direction or "permission" from a funding entity in order to think "outside of the box" in how to prioritize and deliver outreach.

(Optional) Do you identify or work for an organization that works with any of the following "covered" or underserved populations? (Note: The "Covered populations" definition is part of the Digital Equity grant program from the National Telecommunications and Information Administration and will help us track if we are receiving comments from these populations.)	
☒Low-income household	☐Individuals with disabilities

☒Aging individuals (60+)	☒Individuals with a language barrier
☐Incarcerated individuals	☐Individuals who are members of a racial or ethnic minority group
☐Veterans	☒Individuals who primarily reside in a rural area