

January 19, 2024

Re: Comments on the [draft Colorado Digital Access Plan](#) that was published on December 15, 2023
This document compiles feedback submitted via Google Form to the Digital Equity Team

Spring Institute for Intercultural Learning is a Denver-based nonprofit organization with over 40 years of experience delivering programs and services promoting intergenerational educational attainment and social engagement among immigrant and refugee Coloradans to help build a collective and thriving intercultural community. Our service population includes culturally and linguistically diverse international newcomers and many with limited English proficiency who encounter day-to-day language barriers and other factors like social isolation and economic hardship that are associated with challenges to digital access. As such, we are pleased to be among the collaborating organizations contributing to the development of a Colorado Digital Access Plan that reflects the priorities of immigrant and refugee families and supports the organizations that serve their needs through adult education classes, early childhood education programs, and other vital integration initiatives that are intrinsically related to digital literacy and access.

Throughout 2022 and 2023, Spring Institute hosted listening sessions and conducted surveys in Aurora, Colorado Springs, Denver (in person and virtual), Glenwood Springs, Greeley, and Pueblo with a total of 119 community members representing immigrant and refugee perspectives from such countries of origin as Afghanistan, Democratic Republic of the Congo, El Salvador, Ethiopia, Guatemala, Iran, Iraq, Mexico, Morocco, Myanmar/Burma, Somalia, Thailand, Turkey, and Ukraine. We did so as members of the Skills2Compete Colorado Coalition and in collaboration with fellow members of that coalition and its convener, Colorado Center on Law and Policy. Our research was supported by the Economic Policy Institute and the Community Innovation and Resilience for Care and Learning Equity (CIRCLE) Grant Program.

Spring Institute commends Colorado's Digital Equity Team for developing a draft plan that seems to reflect input we gathered through our community engagement research and demonstrates a concerted effort to include people with language barriers in an initiative that so deeply impacts them. We respectfully offer the following comments as guidance for finalizing the Colorado Digital Access Plan:

- *Under 5.1.1 Strategy 1: Create Colorado's digital equity ecosystem (and first mentioned on p. 27):* In addition to the *regional digital inclusion collaboratives*, the plan should allocate funding for adult education providers to incorporate digital literacy training in their existing programs, purchase devices, and offer digital literacy certifications. Adult education providers already serve thousands of individuals across the state who are in need of digital literacy skill improvement and assistance accessing affordable internet and devices. Given that these organizations already provide a degree of digital literacy training through existing funding, they are well placed to expand their digital literacy work with limited start-up time with access to additional funding.
- *Under 5.1.1 Strategy 1: Create Colorado's digital equity ecosystem (and first mentioned on p. 27):* Provide clarity on how the *regional digital inclusion collaboratives* will be implemented with respect to direct involvement by community-based organizations. We recommend that CBOs who serve target communities should be eligible to apply for funding directly, even if funding eligibility requires

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them to serve as part of a digital inclusion collaborative or be affiliated with a designated hub. There are very few organizations in the state with the financial capacity to serve as the primary fiscal agent to multiple organizations, given the state's extremely slow process for procuring and distributing funds.

- Under '*5.1.2 Strategy 2: Improve the affordability of home internet subscriptions → Activity 2.1*' (p. 108): Specify *who* will conduct community outreach and enrollment assistance (CBOs, navigators, faith institutions, schools, etc), and *how – and to what extent* – this outreach work will be funded. To optimize outcomes, how will we ensure financial and technical resources are going to entities *already trusted* by the communities we are trying to reach?
- Under '*5.1.3 Strategy 3: Embed digital inclusion activities into state efforts to promote online accessibility and inclusivity → Activity 3.1*' (p. 109) and '*Strategy 3 → Activities*' (p. 5): Elaborate/specify what is meant by "leveraging efforts to implement HB21-1110 (Colorado Laws For Persons With Disabilities) and SB23-244 (Technology Accessibility Cleanup) to include language accessibility in all state technology assets." What specific activities and outcomes will occur under this strategy, particularly as they relate to language access and the inclusion of Limited English Proficient (LEP) individuals?
 - If not already included under this or another strategy, establish mechanisms and funding to ensure public benefit applications and essential portions of public-facing government websites are translated into the ten (10) most commonly spoken languages in the state. Utilize a translation service that is accurate, comprehensible, and high quality.
- Under '*Strategy 4: Promote initiatives and programs that build digital skills*' (p. 109-110): Explicitly *prioritize (and fund)* digital navigators who share cultural, experiential, and linguistic backgrounds with covered populations. Hire and train digital navigators who already have their communities' trust. Provide digital navigator training in multiple languages, and with reasonable accommodations. The pilot approach relying on AmeriCorps members was ineffective for our service population given limitations in recruiting navigators with the appropriate skills and cultural and linguistic competencies needed to connect with diverse target populations of immigrants, refugees, and those with limited English proficiency.
- Under '*ONA Goal for New Americans → Measurable Objective*' (p. 27): Clarify the definition of the word "*empower.*" Will communities be eligible to receive funding for digital inclusion programs? And/or will they receive devices/educational materials/technical assistance/training/etc?
- Generally, clarify the definition of '*desktop,*' including whether it applies to devices such as laptops and tablets (ex. → first bullet point under '*Access to the Internet and Devices*' on p. 74). If '*desktop*' does not include laptops, tablets, or other non-smartphone devices, revise KPIs related to device ownership such that they include, at a minimum, both laptops and desktops.
- Under '*Immigrants*' (p. 73): Consider rephrasing the last sentence of the third paragraph to be more inclusive of the range of languages from across the globe that are spoken in Colorado (including but not limited to African, European, and Latin American languages) and incorporate the compelling point that [over a quarter of young children in Colorado are part of dual language learner families where at least one parent speaks a non-English language at home.](#)