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# INTERNET FOR ALL

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## Digital Equity Plan Guidance



U.S. Department of Commerce  
National Telecommunications and Information Administration

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# Internet For All

## Introduction

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### Overview of the Digital Equity Plan Requirements

A State that receives funding from the State Digital Equity Planning Grant Program must submit to the Assistant Secretary a Digital Equity Plan that establishes the State’s<sup>1</sup> vision for digital equity in the context of its overarching strategy and goals. The Digital Equity Plan will be a key component of any application the State may later submit seeking a State Digital Equity Capacity grant. States’ Digital Equity Plans need to be driven their broader policy goals that intentionally amplifies the objectives of stakeholders including Community Based Organizations (CBOs), regional government entities, and local government entities.



**IMPORTANT:**

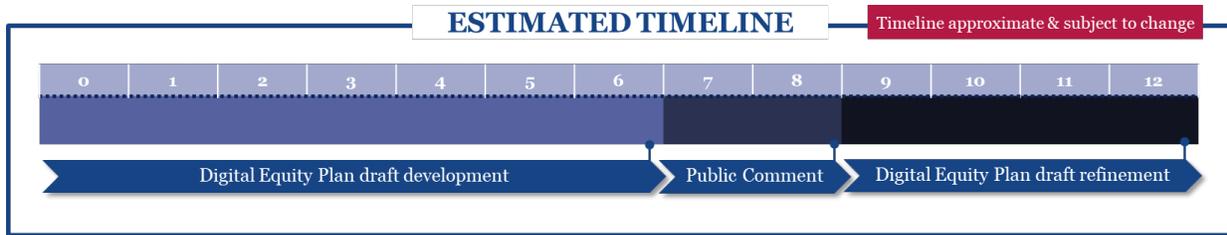
At minimum, a State’s Digital Equity Plan must include 15 requirements, which are detailed in the **State Digital Equity Planning Grant Program NOFO, Section IV.C.1.b.**

At minimum, a State’s Digital Equity Plan must include 15 requirements, which are detailed in the **State Digital Equity Planning Grant Program Notice of Funding Opportunity (NOFO), Section IV.C.1.b.**

Within one year of the date on which a State is awarded State Digital Equity Planning Grant Program funds, that State must develop a State Digital Equity Plan, solicit and respond to public comments on the draft plan, and finalize that draft plan. The State must submit the DE plan to NTIA within the one-year award period (unless extended). *See* Infrastructure Investment and Jobs Act, Section 60304(c)(3)(C)(ii)(I). NTIA may extend the award period for up to 180 days based on a written request from a recipient. Extension requests must be submitted not later than 90 calendar days before the end of the award period. However, the Assistant Secretary will be reluctant to grant a waiver except in extraordinary circumstances.

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<sup>1</sup> The term “State” means, for the purposes of the State Digital Equity Planning Grant Program, any State of the United States, the District of Columbia, and Puerto Rico. *See* NOFO, Section I.C.o.



An online template for the Digital Equity Plan is available, and the use of this template is optional. If a State does not utilize the online template published by NTIA, the State must also provide an index, crosswalk, or similar document to allow the reader to quickly and efficiently locate relevant content. A sample crosswalk is included as an attachment to this document.

If a State has previously conducted a statewide digital equity planning effort, it must demonstrate to NTIA that the resulting plan fully complies with the Section 60304(c) of the Infrastructure Act and the NOFO, including all minimum required elements as listed in Section IV.C.1.b.

NTIA will continue to release resources to assist States in comprehensively meeting the State Digital Equity Planning Grant requirements; these resources will be released on [InternetForAll.gov](https://www.internetforall.gov).

### *Five-Year Action Plan and State Digital Equity Plan Alignment*

The Broadband Equity, Access, and Deployment (BEAD) Program was authorized by the Infrastructure Investment and Jobs Act of 2021 (November 15, 2021), also known as the Bipartisan Infrastructure Law. BEAD provides \$42.45 billion to expand high-speed internet access by funding planning, infrastructure deployment, and adoption programs in all 50 states, Washington D.C., Puerto Rico, the U.S. Virgin Islands, Guam, American Samoa, and the Commonwealth of the Northern Mariana Islands.

It is anticipated that each Eligible Entity participating in the BEAD Program will concurrently participate in the State Digital Equity Planning Grant Program, and in many of the 13 requirements of the BEAD Five-Year Action Plan, there are opportunities to infuse digital inclusion activities to both satisfy requirements of the State Digital Equity Plan and ensure that digital inclusion is a core component of broadband planning. **Thus, if there are multiple teams developing the Five-Year Action Plan and the State Digital Equity Plan, the teams must ensure they consistently and formally collaborate in order to consolidate efforts and limit confusion for mutually relevant stakeholders.** Requirement 11 of the Five-Year Action Plan may be satisfied by the completion of a State Digital Equity Plan under the State Digital Equity Planning Grant Program.

### *How to use the Digital Equity Guidance and Template*

The following pages include a proposed structure and associated guidance to meet the 15 requirements for the Digital Equity Plan. The proposed structure for the Digital Equity Plan includes six sections:

- [Executive Summary](#);
- [Introduction and Vision for Digital Equity](#);

- [Current State of Digital Equity](#);
- [Collaboration and Stakeholder Engagement](#);
- [Implementation](#); and
- [Conclusion](#).

NTIA recommends that States develop an understanding of the current state of Digital Equity and a plan for collaboration and stakeholder engagement before finalizing the goals and strategies to move towards digital equity within a State.

The [appendix](#) includes:

- A list of the Digital Equity Plan’s 5 statutory requirements and 10 additional requirements, as written in the NOFO, Section IV.C.1.b.

The attachments include:

- A template for the Digital Equity Plan

The guidance and template are structured to align with the NOFO’s 15 total requirements. As such, the sections of the guidance with these requirements include call-out boxes with the NOFO language for reference. Each call-out box will feature the page number of the NOFO to locate the requirement, as well as the location number of the requirement within the Statutory Requirements (NOFO Section IV.C.1.b.i) or Additional Requirements section (NOFO Section IV.C.1.b.ii).

The guidance also includes an overview of the purpose of each proposed section, importance of the content for the success of the program and other optional information and/or data that the State may consider when developing the Digital Equity Plan.

# 1 Executive Summary

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The State should provide a clear and concise summary of the Digital Equity Plan. The Executive Summary should restate the purpose and summarize the key points of the Digital Equity Plan.

## 2 Introduction & Vision for Digital Equity

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### 2.1 Vision

**Relevant Requirements from the [NOFO](#), page 21:**

- A stated vision for digital equity Additional Req.1

The purpose of this section is to provide a clear, specific picture of the State’s vision for digital equity. As part of this vision, States should define digital equity in the context of their State.

Each State may use this section to describe what success looks like for their State, inform strategies, serve as a guide for setting goals and objectives, and determine the activities the State will prioritize in the Digital Equity Plan.

States that are also utilizing funding from the Broadband Equity, Access, and Deployment (BEAD) Program should ensure that the programs and plans are coordinated and that the visions for BEAD and digital equity are aligned.



**What should applicants describe for their vision?**

Applicants should focus on describing what success looks like for their State, and it should inform strategies and serve as a guide for setting goals and objectives:

- What will digital equity look like in in the context of your state?
- 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)

### 2.2 Alignment with Existing Efforts to Improve Outcomes

**Relevant Requirements from the [NOFO](#), pages 20-22:**

- 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—
  - a. Economic and workforce development goals, plans, and outcomes;
  - b. Educational outcomes;
  - c. Health outcomes;
  - d. Civic and social engagement; and
  - e. Delivery of other essential services. Statutory Req.3
- A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan. Additional Req.5
- A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the Broadband

Equity, Access, and Deployment Program, other federal or private digital equity funding. Additional Req.10

The purpose of this section is to describe how the Digital Equity Plan is aligned to the State’s priorities and other existing or planned efforts in the State, and how the State will coordinate its use of funds from the State Digital Equity Capacity Grant Program, the Broadband Equity, Access, and Deployment Program, and/or any other federal or private sources. States should detail how the stated objectives for digital equity will impact and interact with the broader efforts and goals of the State.

This section must describe how existing municipal, regional, and/or Tribal digital equity plans are incorporated into the State Digital Equity Plan. It must also detail how the stated objectives for digital equity will impact and interact with the following broader efforts and goals of the State:

-  Economic and workforce development goals, plans, and outcomes
-  Educational outcomes
-  Health outcomes
-  Civic and social engagement
-  Delivery of other essential services

### 2.3 Strategy and Objectives

In this section, States should provide an overview of the overarching strategies for driving towards the vision outlined in section 2.1. While broadband affordability and adoption are key tenets of the Digital Equity Act Programs, States should strive to think about how increased access to high-speed internet can drive equitable outcomes outside of these areas and develop strategies to use Digital Equity funds in service of those goals.

For example:

Goal	Strategy
Improve rural health outcomes	Build capacity of rural health centers and libraries to increase use of telehealth
Increase underrepresented youth employment in technology-related fields	Build career pathways related to in-demand industry sectors and occupations

After laying out overarching strategies, States can lay out measurable tactics and objectives for meeting these goals.

**Relevant Requirements from the [NOFO](#), pages 20-22:**

- Measurable objectives for documenting and promoting, among each Covered Population located in that 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. Statutory Req.2
- An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should (a) establish measurable goals, objectives, and proposed core activities to address the needs of covered populations, (b) set out measures ensuring the plan’s sustainability and effectiveness across State communities, and (c) adopt mechanisms to ensure that the plan is regularly evaluated and updated. Additional Req. 6

In this section, States should provide an overview of the measurable objectives to realize the vision for digital equity in their State. The objectives outlined in the Digital Equity Plan will inform the plan’s implementation strategy and should ensure the plan’s sustainability and effectiveness. As such, each State should consider long-term objectives for closing the digital divide by addressing the needs of covered populations.

The measurable objectives should document and promote the following among each covered population in the State:

 <p><b>Broadband Availability &amp; Affordability</b></p>	 <p><b>Online Privacy &amp; Cybersecurity</b></p>
 <p><b>Online Accessibility &amp; Inclusivity</b></p>	 <p><b>Device Availability &amp; Affordability</b></p>
 <p><b>Digital Literacy</b></p>	

For each topic above, provide a Key Performance Indicator (KPI) to measure progress, a baseline measure (if available), and a near-term and a long-term target.

These measures can differ depending on what data is available and what the State’s priorities are. For example, there are multiple factors affecting broadband affordability. Measures can focus on the price factor; other measures can focus on the Affordable Connectivity Program (ACP), which impacts the effective price for consumers.

*Example: Price*

- **KPI:** Average price of a monthly Internet subscription at 25/3
- **Baseline:** \$X.XX average monthly Internet cost
- **Near-term Target:** 5% decrease
- **Long-term Target:** 20% decrease

*Example: Participation in ACP*

- **KPI:** Number of state residents enrolled in ACP
- **Baseline:** X residents
- **Near-term Target:** 30% increase
- **Long-term Target:** 100% increase

Where possible, States should create these measurable objectives with specifications for each covered population. For example, include information about ACP participation among low-income households, aging individuals, and so on. These measurable objectives should inform the collaboration and stakeholder engagement strategy as well as data collection practices so that the data can be standardized and validated.

## 3 Current State of Digital Equity: Barriers and Assets

### 3.1 Asset Inventory

#### Relevant Requirements from the [NOFO](#), page 21:

- An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments. Additional Req.3

The purpose of this section is to catalogue the applicant's unique assets that promote digital equity for each of the State's covered populations, including current resources, programs, and strategies. Both publicly and privately funded assets should be included. The asset inventory should also include existing digital equity plans and programs among municipal, regional, and Tribal governments.

The asset inventory will identify the resources available to implement the Digital Equity Plan and to address the needs and gaps to achieve the State's goals and objectives for digital equity. An asset mapping resource will be released to aid States in documenting digital equity assets.

#### 3.1.1 Digital Inclusion Assets by Covered Population

Identify digital inclusion assets in the State that support the various covered populations. Keep in mind that multiple assets could exist for a single covered population and that some assets could support multiple covered populations.

Potential resources the State may consider as they conduct their asset inventory are outlined in the following sub-sections, 4.1.1 and 4.1.2.

#### 3.1.2 Existing Digital Equity Plans

Catalogue digital equity plans and programs instituted by municipalities, regions, and/or Tribes that also have a presence in the State. Be sure to note gaps in existing programs.

#### 3.1.3 Existing Digital Equity Programs

Catalogue digital equity plans and programs instituted by municipalities, regions, and/or Tribes that also have a presence in the State. Be sure to note gaps in existing programs.

In addition to the relevant requirements above, States may also choose to include information or resources related to digital inclusion, including existing state policies, mapping, or other technological resources used to inform broadband-related activities, studies and best practices, or outreach endeavors.

### 3.1.4 Broadband Adoption

States may identify and detail the assets in the State, which include, but are not limited to the following:

- Percentage of residents within the State/Territory who have adopted broadband;
- Programs that provide digital literacy and digital skills training, including:
  - Digital skills training in service of workforce development;
- Programs that provide subsidized or low-cost devices (e.g., computers, tablets) (devices);
- Digital Navigator programs;
- Programs that conduct awareness and outreach activities of digital inclusion programming and resources (e.g., marketing and awareness campaigns);
- Existing ISP programs that promote adoption (e.g., adoption campaigns, lifeline, low-cost plans, digital inclusion initiatives);
- Incentives (e.g., subsidies, tax benefits) for incorporation of broadband across different sectors (e.g., education, agriculture, economic development, telemedicine);
- Public computing labs;
- Loaner computer/hotspot programs;
- Programs that offer discounted or low-cost devices with affordable maintenance costs;
- K-12 school system one-to-one computer programs;
- Computer refurbishing programs; and/or
- Digital equity/inclusion coalitions.

While assessing the current landscape of broadband adoption, States should understand the population of high-speed internet users who engage in *meaningful use*, referring to how an individual uses their digital literacy skills to enhance educational and employment opportunities.

### 3.1.5 Broadband Affordability

States may identify and detail the efforts in the State, which include, but are not limited to the following:

- The number of residents eligible for the ACP, the percentage of eligible residents who have accessed the ACP, and the steps taken to increase enrollment in the ACP;
- Discount or subsidized broadband service and equipment programs;
- Utility assistance programs for consumers with limited incomes; and/or
- Provider agreements and contracts that are near expiration (i.e., provide the opportunity for new agreements and contracts that provide more affordable broadband services).

## 3.2 Needs Assessment

**Relevant Requirements from the [NOFO](#), pages 20-21:**

- Identification of barriers to digital equity faced by Covered Populations in the State.  
Statutory Req.1
- A digital equity needs assessment, including a comprehensive assessment of the baseline from which the State is working and the State’s identification of the barriers to digital equity faced generally and by each of the covered populations in the State.  
Additional Req.2

The purpose of this section is to identify the baseline from which the State is working and the barriers to digital equity, especially those that covered populations encounter. Barriers could be related to affordability, devices, digital skills, technical support, and digital navigation.

The needs assessment will serve as a current baseline from which the State can measure its progress toward digital equity. Identifying barriers and conducting a needs assessment will require data collection, both qualitative and quantitative, as well as analysis and evaluation.

**What data sources are available to use?**



[NTIA Internet Use Survey](#)



[NTIA Indicators of Broadband Need Map](#)



[American Community Survey](#)



**IMPORTANT:**

If data or other information is unclear or unavailable, identify plans to clarify and/or obtain this data.

**3.2.1 Covered Population Needs Assessment**

Identify barriers to digital equity that covered populations in the State face. Many barriers will have an associated need. Keep in mind that multiple barriers and needs could exist for a single covered population and that some barriers and needs are experienced by multiple covered populations. Barriers could include factors such as geography, de facto segregation, lack of education, lack of trust, and/or lack of institutional knowledge.

**3.2.2 Broadband Adoption**

States may identify and detail the State’s needs and barriers, which could include, but is not limited to the following:

- Improved digital literacy;
- Increased household broadband subscription;
- Increased households, businesses, and CAIs with access to internet-capable devices; and/or

- Increased emphasis on multi-sector strategies to broadband adoption (e.g., from educational, agricultural, economic development, and telemedicine perspectives).

### 3.2.3 Broadband Affordability

States may identify and detail the needs and gaps in the State, which includes, but is not limited to the following:

- Increased support for enrollment in assistance programs (such as ACP) for low-income consumers; and/or
- Increased financial assistance for low-income consumers;
- Increased options for broadband services, including a wider range of low-cost services.

## 4 Collaboration and Stakeholder Engagement

### 4.1 Coordination and Outreach Strategy

#### Relevant Requirements from the [NOFO](#), pages 20-22:

[A] description of how the State plans to collaborate with key constituencies in the State, which may include:

- a. Community anchor institutions;
- b. County and municipal governments;
- c. Local educational agencies;
- d. Where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;
- e. Nonprofit organizations;
- f. Organizations that represent—
  - i. Individuals with disabilities, including organizations that represent children with disabilities;
  - ii. Aging Individuals;
  - iii. Individuals with language barriers, including 1) Individuals who are English learners; and 2) Individuals who have low levels of literacy;
  - iv. Veterans; and
  - v. Individuals in that State who are incarcerated in facilities other than Federal correctional facilities;
- g. Civil rights organizations;
- h. Entities that carry out workforce development programs;
- i. Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;
- j. Public housing authorities in the State; and
- k. A partnership between any of the entities described [above.] Statutory Req.4
- A list of organizations with which the Administering Entity for the State collaborated in developing the Plan. Statutory Req.5
- To the extent not addressed in connection with item 4 of Section IV.C.1.b.i (Statutory Requirement 4), a coordination and outreach strategy, including opportunities for public comment by, collaboration with, and ongoing engagement with representatives of each category of covered populations within the State and with the full range of stakeholders within the State. Additional Req.4
- A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with:

- Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations;
- Labor organizations and community-based organizations; and
- Institutions of higher learning, including but not limited to four-year colleges and universities, community colleges, education and training providers, and educational service agencies Additional Req.8

The purpose of this section is for the State to:

- Identify key external collaborators and constituencies the State collaborated with to develop the Digital Equity Plan
- Detail its coordination and outreach strategy to collaborate, including opportunities for public comment and ongoing engagement, to achieve the State’s digital equity goals and objectives
- Describe how the State will implement its strategy by partnering with workforce agencies, labor organizations, and institutions of higher of learning

Successful workforce policy implementation is one level Eligible Entities can use to build equity into all Internet For All programs. States that are also utilizing funding from the Broadband Equity, Access and Deployment (BEAD) Program should ensure that the outreach and engagement plans to state and local agencies in economic development, health, and education are coordinated across the two programs.

**What are key organizations to include?**

- Community anchor institutions
- County and municipal governments
- Local educational agencies
- Indian Tribes, Alaska Native entities, and Native Hawaiian organizations
- Nonprofit organizations
- Organizations that represent covered populations
- Civil rights organization
- Entities that conduct workforce development programs
- State agencies responsible for adult education and literacy activities
- Public housing authorities

## 5 Implementation

### 5.1 Implementation Strategy & Key Activities

#### Relevant Requirements from the [NOFO](#), page 22:

- An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should (a) establish measurable goals, objectives, and proposed core activities to address the needs of covered populations, (b) set out measures ensuring the plan’s sustainability and effectiveness across State communities, and (c) adopt mechanisms to ensure that the plan is regularly evaluated and updated. Additional Req.6
- 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 (Statutory Requirement 1). Additional Req.7

The purpose of this section is to outline the foundational strategy and key activities that will inform the State’s Request for Proposal (RFP) for the State Digital Equity Capacity Grant Program. The implementation strategy should be holistic and include activities that address the barriers to digital equity identified in the Current State of Digital Inclusion section of the plan, as well as address the gaps in existing state, local, and private efforts to address those barriers.

The implementation strategy must:

- Establish core activities to achieve the stated goals and objectives;
- Incorporate measures to ensure the plan is sustainable and effective across State communities; and
- Adopt mechanisms to ensure the plan is regularly evaluated and updated.

To determine the implementation strategy and key activities, States should draw from the findings of the Asset Inventory and Assessment of Needs & Barriers sections. States must clearly lay out their strategy, the barriers addressed, measurable goals, corresponding activities, and estimated timeline.

### 5.2 Timeline

#### Relevant Requirements from the [NOFO](#), pages 22:

- A timeline for implementation of the plan. Additional Req.9

The purpose of this section is to provide a timeline for the implementation of the plan. States may consider including conditions that could impact the estimated timeline, such as those that would extend or escalate the timeline.

## 6 Conclusion

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The purpose of this section is to provide a conclusion that reiterates the purpose and the key points of the State Digital Equity Plan.

Each State may also choose to provide insight into the impact of its execution on digital inclusion for the State.

## 7 Appendices

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### 7.1 Digital Equity Plan Statutory Requirements

The statutory requirements for the contents of State Digital Equity Plans are set forth in Section 60304(c)(1) of the Infrastructure Act, and are listed below and in Section IV.C.1.b.i of the State Digital Equity Planning Grant NOFO:

1. Identification of barriers to digital equity faced by Covered Populations in the State.
2. Measurable objectives for documenting and promoting, among each Covered Population located in that State—
  - a. The availability of, and affordability of access to, fixed and wireless broadband
  - b. technology;
  - c. The online accessibility and inclusivity of public resources and services;
  - d. Digital literacy;
  - e. Awareness of, and the use of, measures to secure the online privacy of, and cybersecurity with respect to, an individual; and
  - f. The availability and affordability of consumer devices and technical support for those devices.
3. An assessment of how the measurable objectives identified in item 2 above will impact and interact with the State’s—
  - a. Economic and workforce development goals, plans, and outcomes;
  - b. Educational outcomes;
  - c. Health outcomes;
  - d. Civic and social engagement; and
  - e. Delivery of other essential services.
4. In order to achieve the measurable objectives identified in item 2 above, a description of how the State plans to collaborate with key stakeholders in the State, which may include—
  - a. Community anchor institutions;
  - b. County and municipal governments;
  - c. Local educational agencies;
  - d. Where applicable, Indian Tribes, Alaska Native entities, or Native Hawaiian organizations;
  - e. Nonprofit organizations;
  - f. Organizations that represent—
    - i. Individuals with disabilities, including organizations that represent children with disabilities;

- ii. Aging Individuals;
  - iii. Individuals with language barriers, including—
    - 1. Individuals who are English learners; and
    - 2. Individuals who have low levels of literacy;
  - iv. Veterans; and
  - v. Individuals in that State who are incarcerated in facilities other than Federal correctional facilities;
  - g. Civil rights organizations;
  - h. Entities that carry out workforce development programs;
  - i. Agencies of the State that are responsible for administering or supervising adult education and literacy activities in the State;
  - j. Public housing authorities in the State; and
  - k. A partnership between any of the entities described in clauses (a) through (k).
5. A list of organizations with which the Administering Entity for the State collaborated in developing the Plan.

## 7.2 Digital Equity Plan Additional Requirements

In addition to the above requirements, the State Digital Equity Plan developed with planning grant funds shall, at a minimum, include the following:

1. A stated vision for digital equity;
2. A digital equity needs assessment, including a comprehensive assessment of the baseline from which the State is working and the State’s identification of the barriers to digital equity faced generally and by each of the covered populations in the State;
3. An asset inventory, including current resources, programs, and strategies that promote digital equity for each of the covered populations, whether publicly or privately funded, as well as existing digital equity plans and programs already in place among municipal, regional, and Tribal governments;
4. To the extent not addressed in connection with item 4 of the State Digital Equity Planning Grant NOFO, Section IV.C.1.b.i, a coordination and outreach strategy, including opportunities for public comment by, collaboration with, and ongoing engagement with representatives of each category of covered populations within the State and with the full range of stakeholders within the State;
5. A description of how municipal, regional, and/or Tribal digital equity plans will be incorporated into the State Digital Equity Plan;
6. An implementation strategy that is holistic and addresses the barriers to participation in the digital world, including affordability, devices, digital skills, technical support, and digital navigation. The strategy should (a) establish measurable goals, objectives, and proposed core activities to address the needs of covered populations, (b) set out measures ensuring the plan’s sustainability and effectiveness across State communities, and (c) adopt mechanisms to ensure that the plan is regularly evaluated and updated;

7. 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 the State Digital Equity Planning Grant NOFO;
8. A description of how the State intends to accomplish the implementation strategy described above by engaging or partnering with:
  - a. Workforce agencies such as state workforce agencies and state/local workforce boards and workforce organizations;
  - b. Labor organizations and community-based organizations; and
  - c. Institutions of higher learning, including but not limited to four-year colleges and universities, community colleges, education and training providers, and educational service agencies;
9. A timeline for implementation of the plan; and
10. A description of how the State will coordinate its use of State Digital Equity Capacity Grant funding and its use of any funds it receives in connection with the Broadband Equity, Access, and Deployment Program, other federal or private digital equity funding.