



WGU

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Dr. Charles W. Sorenson
*President and CEO Emeritus,
Intermountain Healthcare*

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[Docket No. 220105–0002 Infrastructure Investment and Jobs Act Implementation]

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Michael O. Leavitt
Governor, Utah 1993–2003

National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Avenue NW
Washington, DC 20230

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Thank you for this opportunity which allows Western Governors University (WGU) to respond to the Request for Comment on the NTIA’s Bipartisan Infrastructure Law broadband programs implementation efforts. WGU is a private, nonprofit institution of higher education based in Salt Lake City, Utah, offering online competency-based education programs to students across the nation. WGU is accredited by the Northwest Commission on Colleges and Universities, currently serving over 129,000 students with more than 260,000 graduates across all 50 states. WGU advocates for public policies that enable and empower innovation on behalf of students, ensure academic quality, expand access to affordable education, improve accountability, and prioritize student-centered supports and graduation outcomes.

WGU is uniquely positioned in the discussion on the administration’s goal of ensuring that all Americans have access to affordable, reliable, high-speed broadband. WGU was founded 25 years ago by 19 U.S. governors as a nonprofit, completely online university. From our pioneering launch in 1997, WGU has grown to become the largest online, competency-based university in the country and has changed the lives of more than 260,000 graduates, their families, and their communities.

WGU was founded to boost workforce competitiveness in the United States. As the world moved into the digital age, WGU opened the door to provide learning opportunities to students underserved by traditional higher education institutions. As internet access improves and becomes more widely available, WGU will continue to reinvent higher education so every individual can have a pathway to opportunity and realize their career potential. Most of our students are trained in high-demand fields such as nursing, teaching, business, and information technology fields, which are critical to the nation’s workforce.



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WGU strongly supports the intent of the Bipartisan Infrastructure Law (BIL), which includes a historic investment of \$65 billion to help close the digital divide. Creating access to broadband for all is a far-reaching initiative that will have significant upfront costs but will yield considerable dividends. With broadband in every home, each family will have an access point for learning and work, creating unparalleled opportunities for individual prosperity and economic growth. Therefore, we respectfully submit our feedback on several of the questions listed in the RFC.

Respectfully Submitted,

Scott Pulsipher
President, Western Governors University

1. What are the most important steps NTIA can take to ensure that the Bipartisan Infrastructure Law's broadband programs meet their goals with respect to access, adoption, affordability, digital equity, and digital inclusion?

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A crucial step the NTIA can take to ensure that the Bipartisan Infrastructure Law's broadband programs meet their goals with respect to access, adoption, affordability, digital equity, and digital inclusion would be a requirement for states and territories to include higher education institutions as subgrantees and partners in their broadband plans.

Education is the surest path to opportunity. Unfortunately, at a time when nearly all educational pursuits across the lifelong learning spectrum involve an online component, a devastating number of learners are excluded because they lack access to quality internet connections and digital devices. According to the Federal Communications Commission (FCC), at least 14.5 million Americans do not have access to reliable, high-speed internet at home, with the actual number likely much higher. As schools began shutting down early in the pandemic, much attention was given to the more than 15 million K–12 learners who struggled to engage in education because they did not have broadband access. However, less attention was given to the 57% of college students who wrestled with finding reliable, high-speed internet connections due to a lack of infrastructure and other barriers, such as the cost of reliable, high-speed internet service.¹

In response to a growing need in August 2020, WGU established an Online Access Scholarship Program to close the digital gap for existing and new WGU learners without access to affordable or reliable internet. The scholarship covers the cost of both broadband and a computer device to complete their degrees. This commitment to expand broadband and provide equitable access to education to our vulnerable and underserved student populations, including rural and urban low-income populations.

WGU's effort is important, but in the context of the digital divide that plagues our country, it is a limited stopgap measure. As states grapple with economic recovery and getting people back to work amid the ongoing COVID-19 pandemic, it is critical to identify the infrastructure and support needed to ensure that all adults seeking credentialing and training opportunities have broadband access for flexible learning, anytime, anywhere. America cannot afford to allow adult learners to be offline and left behind. Therefore, engaging higher education institutions in the planning and implementation broadband access programs is crucial. The increasing shift to online learning, work, healthcare, and retail due to the pandemic only underscores the significance of including higher education institutions in BIL broadband access planning, especially for those institutions serving large numbers of rural, military, and low-income learners, as in the case of WGU.

¹ <https://www.common sense media.org/digital-divide-stories#/state> and <http://thirdway.imgix.net/New-America-and-Third-Way-Higher-Ed-Student-Polling-Data.pdf>



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6. The Bipartisan Infrastructure Law requires states and territories to competitively select subgrantees to deploy broadband, carry out digital equity programs, and accomplish other tasks. How should NTIA assess a particular state or territory's subgrant award process? What criteria, if any, should NTIA apply to evaluate such processes? What process steps, if any, should NTIA require (e.g., Request for Proposal)? Are there specific types of competitive subgrant processes that should be presumed eligible (e.g., publicly released requests for proposals and reverse auctions)?

When assessing a state or territory's subgrant award process, the NTIA should consider a requirement for states and territories to include a variety of higher education institutions as sub-grantees and partners within their broadband plans. The increasing shift to online learning, work, healthcare, and retail due to the pandemic only underscores the significance of including higher education institutions in BIL broadband access planning, especially for institutions that serve large numbers of rural, military, and low-income learners.

As states grapple with economic recovery and getting people back to work amid the ongoing impacts of COVID-19, it is critical to identify the infrastructure and supports needed to ensure all adults seeking credentialing and training opportunities have broadband access for flexible, online learning. In November 2021, the National Student Clearinghouse Research Center reported that undergraduate higher education enrollment has declined by 8% since 2019. Community colleges, which typically enroll large numbers of diverse underrepresented and low-income students, experienced a 15% decrease during the same period. It is estimated that 57% of higher education learners struggled to secure reliable, high-speed internet connections due to a lack of infrastructure and other barriers, such as costs.² America cannot afford to allow adult learners to be offline and left behind. Higher education's engagement in broadband access programs is crucial.

7. NTIA views the participation of a variety of provider types as important to achieving the overall goals of the Bipartisan Infrastructure Law broadband programs. How can NTIA ensure that all potential subrecipients, including small and medium providers, cooperatives, non-profits, municipalities, electric utilities, and larger for-profit companies alike have meaningful and robust opportunities to partner and compete for funding under the programs?

As states grapple with economic recovery and the return to work amid the constantly changing backdrop of the COVID-19 pandemic, it is critical to identify the infrastructure and supports needed to ensure all adults seeking credentialing and training opportunities have broadband access for flexible, online learning. America cannot afford to allow adult learners to be offline and left behind. Higher education's engagement in broadband access programs is crucial.

² <https://www.common sense media.org/digital-divide-stories#/state> and <http://thirdway.imgix.net/New-America-and-Third-Way-Higher-Ed-Student-Polling-Data.pdf>



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The increasing shift to online learning, work, healthcare, and retail due to the pandemic only underscores the significance of including higher education institutions in BIL broadband access planning, especially for institutions that serve large numbers of rural, military, and low-income learners. It is estimated that 57% of higher education learners struggled to secure reliable, high-speed internet connections due to a lack of infrastructure and other barriers, such as cost.²

The NTIA can ensure that all potential subrecipients have meaningful and robust opportunities to partner and compete for funding under the programs by taking steps to incorporate higher education providers as required subrecipients under the program. Post-secondary providers, including private, non-profit, online institutions with digital access and equity as identified priorities for serving adult learners, can serve as crucial partners in ensuring that those who need broadband access to participate in education and training can secure connections and service and the technology necessary to succeed. Online institutions with experience providing equitable access to broadband service can act as thought leaders and share best practices with less experienced institutions.

26. Some states and territories will benefit from technical assistance in preparing Digital Equity Plans. What types of technical assistance, support, data, or programmatic requirements should NTIA provide to states and territories to produce State Digital Equity Plans that fully address gaps in broadband adoption, promote digital skills, advance equitable access to education, healthcare and government services, and build information technology capacity to enable full participation in the economy for covered populations? What steps, if any, should NTIA take to monitor and assess these practices?

As states and territories prepare to produce State Digital Equity Plans that fully address gaps in broadband adoption, promote digital skills, advance equitable access to education and other services, their success will depend upon collaboration with partners who can assist them in building the capacity needed to help underserved populations fully participate in the skills economy. It is critical to identify the infrastructure and supports required to ensure that all adults seeking credentialing and training opportunities have broadband access for flexible, online learning.

America cannot afford to allow adult learners to be offline and left behind. Higher education's engagement in broadband access programs is crucial. The increasing shift to online learning, work, healthcare, and government services during the pandemic only underscores the significance of including experienced higher education institutions in BIL broadband access planning. Online institutions, like WGU, which have identified digital access and equity as priorities in serving their students, should be considered high-priority partners, especially those that serve large numbers of rural, military, and low-income learners via online delivery methods. These institutions are uniquely able to provide data about the challenges faced by their students and hands-on experience in



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implementing potential interventions for underserved students. In this role, these institutions can serve as thought leaders and provide best practices for peer institutions. Therefore, the NTIA should take steps to monitor and assess whether states and territories have designated State Equity Plan leadership teams that implement strategies and practices which ensure diverse higher education institutions are included as planning partners and subrecipients in grant funding.

The NTIA should also assess how state groups utilize data to make strategic decisions. Many states have identified important questions to be answered as they address the digital divide for online learners and workers and are cognizant of instances where a dearth of data may impede their ability to answer those questions. A state that already has an individual or agency with broadband responsibility should conduct a realistic assessment of whether there is sufficient capacity to oversee a multifaceted, collaborative broadband strategy, with the ability to add capacity as appropriate. This approach will require providers to help coordinate existing data to identify potential interventions and track their outcomes. When responsibility is unclearly allocated to an office or agency, or if there is an unclear individual or agency with broadband responsibility, states should be encouraged to designate an authority explicitly.

The NTIA should also monitor how states with a task force or broadband office assess the process for engaging with higher education institutions in planning efforts and problem-solving conversations. Additionally, any statewide broadband initiatives to improve access to online learning and work should track and report outcomes as a way of aggregating best practices in a timely and consistent manner.

28. How should NTIA ensure that State Digital Equity Plans impact and interact with the State's goals, plans and outcomes related to: (i) Economic and workforce development; (ii) education; (iii) health; (iv) civic and social engagement; (v) climate and critical infrastructure resiliency; and (vi) delivery of other essential services, especially with respect to covered populations mentioned in Bipartisan Infrastructure Law § 60303(2)(C)?

The digital divide is the gap between those who have access to reliable high-speed internet and those who do not. Research shows that more than 4 in 10 adults with household incomes below \$30,000 a year do not have home broadband services, and roughly 39 percent of rural Americans lack access to high-speed broadband, compared with just 4 percent of urban Americans. Also, approximately 2/3 of all new jobs since 2009 require a medium to medium-high digital literacy and require the individual to connect online.³

The glass ceiling has recently been transformed into a digital ceiling for women, individuals of color, and those from lower-income communities. Gaps in digital literacy and broadband access are fueling a growing wage disparity. Therefore, WGU supports policy efforts to expand reliable broadband access to support the online delivery of

³ <https://www.pewresearch.org/fact-tank/2019/05/07/digital-divide-persists-even-as-lower-income-americans-make-gains-in-tech-adoption/>



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educational programming for students. Reliable broadband allows learners everywhere to access education and ongoing skill training at any time, thereby increasing employability and social mobility. The governors who founded WGU saw the power the internet has to transform education, particularly for rural communities. While the internet continues to be a tool for educational innovation, it has proven to be even more vital with the onset of COVID-19. The pandemic has shown that broadband is the backbone for the entire education continuum, not to mention its impact on work, healthcare, and everyday interpersonal interactions.

State Digital Equity Plans must be designed with the state goals, plans, and outcomes in mind to ensure that education and workforce systems do not fall short of inclusivity.

Economic and workforce development must be inextricably linked to post-secondary education to strategically eliminate systemic barriers that limit opportunities for traditionally underserved communities. The intentional linkage of these two systems will organically support goals in healthcare, civic and social engagement, climate and critical infrastructure resiliency, as well as the delivery of other essential services.

The NTIA can ensure that all Americans, especially those covered populations mentioned in BIL programs, receive access by evaluating State Digital Equity Plans on their inclusion of and collaboration with higher education providers with outcomes tied to workforce needs, digital access, and equity. States must clearly designate an individual, agency, or group as the broadband leader within the state, with the capacity to assess broadband needs in an ongoing fashion, problem-solve with a wide variety of stakeholders, and braid together a variety of funding streams. Since the start of the pandemic, many higher education institutions have stepped in to help connect students with free or reduced-cost broadband services and devices. They are critical stakeholders who should be intentionally and strategically engaged in broadband planning and implementation conversations. States should engage with a variety of higher education stakeholders, including private, nonprofit, online institutions with demonstrated outcomes in related areas. Any statewide initiatives to expand broadband access should also mandate service quality by incorporating specified minimum hardware and software requirements sufficient for online learning and working.

States will have to take a targeted approach to address the digital divide truly. This includes assessing the digital skill gap in their state, understanding what skills are most critical for higher education and employers, and ensuring that digital skill training offerings are accessible to those most in need and aligned to the most vital skills. States should convene higher education institutions, employers, and others to understand which digital skills are imperative and ensure digital literacy initiatives in the state align to those needs.

Overall, the NTIA should require states to report how they have engaged higher education institutions in planning efforts as potential subrecipients for grant funds. Additionally, any statewide broadband initiatives should meaningfully track and report on intervention outcomes to help improve state and national understanding of best practices.