

AARP Rhode Island

Rhode Island Draft Digital Equity Plan Review/Comments

2/6/24

Executive Summary

AARP appreciates the opportunity to comment on Rhode Island’s Draft Digital Equity Plan (“Plan”), which was created by the Rhode Island Commerce Corporation (“Corporation”). These comments reflect in part AARP’s perspective based on its many years of experience advocating for older adults on many issues, including on reliable, affordable high-speed internet access, as well as its review of the draft digital equity plans of 48 other states.

AARP commends the Plan’s comprehensive discussion and analysis of the challenges to and benefits from achieving digital equity as well as for a thoughtful and clearly articulated roadmap for narrowing digital disparities in Rhode Island. The Plan reflects extensive data analysis as well as extensive stakeholder outreach and engagement. The Executive Summary provides a valuable overview of the core components of the Plan. This will greatly benefit readers who don’t have time to read the entire Plan.

On page 23, the Plan cites Census Bureau data that finds that over 20% of the state’s population reflect individuals with a language barrier (one of the eight “covered populations” in the Digital Equity Act). AARP is hopeful that the Corporation will add links to translations of the Executive Summary into the major languages spoken in Rhode Island, a practice that AARP has observed some other states have implemented. AARP is also hopeful that the website will provide an easy-to-use link for those lacking English proficiency to connect to information about and during the state’s implementation of the Plan.

Introduction and Vision for Digital Equity

AARP supports Rhode Island’s overarching vision for digital equity: “to leverage a best-in-class, resilient, sustainable, and scalable broadband infrastructure to propel the state’s 21st century economic, education, healthcare, civic and social engagement, and quality of life, by ensuring that all Rhode Islanders have access to affordable, accessible high-speed internet in their homes, at their places of employment, and at public facilities by 2027.” This is a robust vision that will aptly guide digital equity progress for years to come.

AARP appreciates the Plan’s commitment to the alignment of Rhode Island’s digital equity efforts with both existing municipal, regional, and tribal digital equity plans and state priorities and outcomes related to economic and workforce development, education, health, civic and social engagement, and delivery of essential services. AARP offers the following to show how advancing each of these priority state outcomes through increased broadband adoption will help older adults in the state:

- Better connectivity will enhance workforce development and economic growth outcomes in the state. While older adults may be exiting the workforce more than other covered populations, AARP is hopeful the final Plan will acknowledge the need for upskilling or learning technology to supplement retirement/fixed income through entrepreneurship. AARP research has shown small businesses are an important source of jobs for older workers; please find additional information from employment and older workers here - <https://www.aarp.org/content/dam/aarp/ppi/2023/4/us-small-business-employment-and-older-workers.doi.10.26419-2fppi.00190.001.pdf>
- Digital equity will positively impact educational outcomes in the state. AARP notes that expanded educational opportunities facilitated by greater connectivity can yield personal growth and career advancement benefits for older adults in Rhode Island. Increased access to education opportunities allows older adults to learn a new talent or skill, start a secondary career, and meet like-minded people. Educational outcomes can help older adults maintain their independence, preserve their dignity, and have a positive attitude toward aging.
- Health outcomes will improve with better connectivity. As people age, doctor appointments become a bigger part of life. Being responsible for driving a loved one to several appointments a week or to specialists dozens of miles away can pose a challenge. The hours spent on the road and in waiting rooms add up fast. Telehealth can assist older adults age in place safely and obtain access to state-of-the-art health care. AARP is hopeful that the implementation phase of the Plan will emphasize assisting older adults connecting to health care.
- Better digital connectivity will enhance the civic and social engagement of older adults in Rhode Island by reducing social isolation. For more information see: <https://www.nytimes.com/2023/09/06/opinion/loneliness-epidemic-solutions.html> and <https://www.nytimes.com/2023/04/30/opinion/loneliness-epidemic-america.html> <https://www.nia.nih.gov/news/social-isolation-loneliness-older-people-pose-health-risks>
- Successful digital equity efforts will expand older adult access to essential services. Particular needs include accessing government programs, telehealth services, digital literacy, and devices to connect them to other support services. Public libraries play an important role in older adults in Rhode Island accessing these essential services and AARP supports efforts to ensure these pillars of the digital equity ecosystem are adequately funded.

Comment on the Plan’s strategies, objectives, and KPI’s is provided in the Implementation section.

Current State of Digital Equity: Barriers and Assets

AARP appreciates the Plan’s comprehensive inventory of assets across Rhode Island that promote digital equity. Rhode Island has an impressive foundation to support its continuing

efforts to close digital gaps. AARP appreciates being recognized as a digital inclusion asset in 3.1.3 on page 32. We are hopeful the final Plan will also include Older Adults Technology Services (OATS) from AARP's program "Senior Planet" as an asset to older adults in Rhode Island. Please note as well as offering online classes through Senior Planet to older adults in Rhode Island, Senior Planet also hosts a National Tech Hotline: 888-713-3495 which is monitored by Senior Planet Trainers from 9am – 5pm EDT, Monday through Friday. These programs are designed to help older adults aged 60 and older thrive in the digital world and harnesses technology to change the way we age. Senior Planet also has a licensing program that equips local organizations across the country with the tools and curriculum to help older adults access technology and use it to enhance their lives.

AARP is hopeful that the Corporation updates and publicizes these inventories to inform best practices throughout the state and considers making some of the information available in languages in addition to English.

The Plan provides a valuable overview of existing resources that facilitate adoption and affordability. Among other programs are various organizations' and agencies' efforts to increase Affordable Connectivity Program (ACP) participation. AARP welcomes the opportunity to contribute to ACP or successor affordability program outreach and education.

The needs assessment in Section 3.2 is comprehensive and will provide a valuable tool as the Plan implements programs and projects throughout the state. AARP commends the Corporation gathering both quantitative data and qualitative feedback to inform the Plan's needs assessment. Rhode Island's summary findings for older adults are consistent with AARP's experience based on its advocacy in many states and at the federal level:

- Affordability - Affordability remains a key barrier preventing older adults from getting online. Many older adults live on fixed incomes with Social Security being the primary source of income. When adding car or transportation costs, groceries, health and medical costs, and other living expenses, it can be difficult for older residents to manage an additional bill for broadband. Affordability as a barrier for older adults is further evidenced by ACP participation within the state. 49% of all ACP enrollees in Rhode Island are households with a resident 50 or older. That's over 38,000 households. Summary findings on page 52 mention affordability as a barrier for older adults, however the Summary of Barriers to Digital Equity on page 63 does not include affordability as a barrier for older adults. AARP is hopeful that the final Plan will clearly indicate affordability remains a barrier for older adults.
- Reliability - AARP supports an additional Objective within Goal 1 that directs action toward improving internet reliability within the state. Older adults, especially in rural areas, may experience slow speeds that struggle to upload or download items. Completing online job or government benefit applications or ordering something through an e-commerce platform creates a challenge, especially when the internet service times out. Internet reliability is also a significant challenge for educators, institutions, and students, in addition to employers, businesses, and the agriculture sector. User dissatisfaction with reliability and speed are important because they provide evidence of disparate

levels of technology and quality of high-speed internet access. The reliability of the high-speed internet access that covered populations can afford and that are available in their communities should mirror that offered to and subscribed to by others in Rhode Island.

- Digital literacy – As technology and Internet-connected devices become more integrated into daily life, there is a tendency to assume that everyone has a certain base level of proficiency. But the reality is that even if we can achieve universal broadband availability, affordability, and device distribution, a lack of digital skills will leave too many older adults in Rhode Island unable to benefit from those successes. From navigating websites, to using a word processor, to assessing the reliability of information online, digital skills building is fundamental to ensuring equitable access to technology and the Internet.
- Devices/Tech support - Not all older adults in Rhode Island have devices that meet their needs. In fact, American Community Survey data show that older adult households in the state continue to lag behind younger demographics, when it comes to devices. AARP maintains that assistive technologies should be available to those who need it and that technical assistance will be needed as more underserved populations get access to devices. This assistance will help ensure that device will be used and lasting over time.
- Cybersecurity - AARP supports efforts to increase awareness and adoption of internet privacy and security practices by older adults in Rhode Island. Trust and privacy concerns remain a barrier preventing older adults from adopting broadband and new technology. A recent AARP survey (Tech Trends 2023) found that 18% of survey respondents expressed concern about trust and privacy. AARP maintains that older adult’s lack of digital literacy and gaps in digital skills exacerbate fears about online safety and privacy, making some more reluctant to obtain home access to high-speed internet. Digital know-how, comfort using new technologies and applications, and having the skills to protect one’s privacy are inter-related and critically important to older adults. Moreover, aging individuals are especially susceptible to scams and are concerned about their privacy being jeopardized. For example, a recent Pew Report states: “Two-thirds (67%) of adults say they understand little to nothing about what companies are doing with their personal data, up from 59%.” The Report also states: About seven-in-ten Americans are overwhelmed by the number of passwords they have to remember. And nearly half (45%) report feeling anxious about whether their passwords are strong and secure. AARP commends Rhode Island for Core Activity 1.3 to incorporate online privacy and cybersecurity skill-building in digital inclusion services. Please use people with lived experience as ambassadors of the campaign.

If possible, please break down Digital Literacy responses shown in Figure 3 “Online Activities Among RI Internet Users” on page 41, by covered population. Likewise for Figure 4 “Highest Concerns for Online Privacy and Cybersecurity.”

AARP has members that span all eight covered populations; therefore, we appreciate the inclusion of Figure 6 “Intersections between Rhode Island’s Covered Populations”, and that Rhode Island has made inferences about these intersections throughout the "Current state of digital equity: Barriers and assets” section.

We appreciate the inclusion of qualitative focus group quotes throughout the “Aging Individuals” section on page 52. With 264,840 adults over the age of 60 within Rhode Island (page 23), we request the final Plan please include the number of Aging Individuals Rhode Island conducted focus groups with and received survey responses from, even if in an Appendix. Similarly, please provide references for “Summary of Barriers to Digital Equity” table on pages 62 through 64.

Stakeholder Engagement

The Plan reflects extensive and multi-faceted outreach. Successful implementation of the Plan depends on maintaining and expanding the impressive level of collaboration and partnerships the Plan undertook.

AARP appreciates the Corporation’s efforts to conduct a Broadband Summit, over 40 listening sessions, 13 Digital Inclusion Week events, and two statewide workshops in 2023. This in-person solicitation provides rich information to overlay the insights provided by federal government data and Rhode Island’s three surveys. AARP suggests the Corporation invest sufficient resources to continue in-person solicitation to ensure effective feedback is received from populations not using the internet. Mail and in-person surveys, focus groups, roundtables, community partner events are all excellent avenues to foster collaboration and to ensure true progress is achieved throughout the forthcoming grant period and beyond.

AARP highly commends the Plan’s “Community Stories” spread throughout the entire document. These stories improve the readability of the Plan and help connect the reader to underserved populations. AARP appreciates being acknowledged as a contributor to the Statewide Digital Equity Working Group on page 71.

Implementation

The Plan’s approach to implementation dovetails well with the assets and barriers the Plan identifies and builds off of the partnerships and relationships described. The many elements of the plans for implementation appear ambitious yet pragmatic. The Summary of Strategies and Core Activities chart on page 76 is useful, however please specify which covered populations will benefit the most from each core activity described.

AARP commends the Plan for committing to Objectives and KPIs for each of the five strategies put forward. We note that the Plan states an intention to refine and finalize proposed strategies and activities after the federal Capacity Grant awards and requirement have been announced. AARP encourages the final Plan to incorporate clear and measurable short, medium, and long-term KPI’s that focus on outcomes, when possible. For example, “Number of training programs for online privacy and cybersecurity” could be changed to “Number of covered individuals that feel more confident in protecting their online privacy after attending a digital skills class”, or instead of “Number of programs providing training on digital skills related to state priorities...”, this could be changed to “Number of covered individuals that report an increase in feeling socially connected due to attending a digital skills class... etc.” AARP is hopeful the final Plan

will tie these covered population-specific actions back to covered population-specific needs assessment findings and anchor them to a quantified baseline for each.

Strategy 1: Create and align opportunities for Rhode Islanders to obtain the digital skills necessary to achieve our state’s priorities.

AARP appreciates Rhode Island's consideration of curriculum and trainer development as part of core activities of Strategy 1 “Create and align opportunities for Rhode Islanders to obtain the digital skills necessary to achieve our state’s priorities.” Please ensure “existing Covered Population-serving ecosystems” have standardized curriculum and appropriate resources such as trainers, administrators to ensure long-term access and enjoyment of digital inclusion services.

AARP recommends the final Plan include an action to require subgrantees to detail a plan for ongoing technical assistance related to their devices, whether given for ownership or available as a loan. Subgrantees would provide narrative details on fixes or replacements for broken devices, a plan for basic IT guidance for device recipients, and consider inclusion of limited warranties for refurbished devices. A KPI could track progress through annual subgrantee reporting, including number of devices deployed and number of residents assisted with technical support.

AARP commends Core Activity 1.2 to invest in existing Covered Population-serving ecosystems to ensure all geographic regions (five counties) have access to comprehensive digital inclusion services. In achieving this activity, AARP recommends Rhode Island balance investments between capacity building and direct services and between proven models and new, innovative strategies. For reasons outlined in comments on the Barriers and Needs section above, AARP supports Core Activity 1.3 to incorporate online privacy and cybersecurity skill-building in digital inclusion services. Please ensure aging individuals that have lived experience with digital inclusion services are tapped to support Core Activity 1.4.

Strategy 2: Increase access to affordable, high-quality large-screen internet enabled devices and technical support that meets residents’ needs.

AARP appreciates this strategy as device access is a barrier for all covered populations. This strategy considers accessibility of technology and will ensure those with differing needs can access and adopt the technology they require. How will Rhode Island ensure they understand what devices are required to “meet residents’ needs”? We commend Objective 2 that includes both a help desk and technical support. We recommend that the help desk and technical support are offered in easily accessible locations or virtually and are provided in a culturally competent manner. We also caution Rhode Island from creating an ecosystem of used devices and device loan programs as an avenue for getting devices to people. Used devices can often provide a subpar experience and can be a detriment to overall digital skill adoption as they may require additional maintenance or no longer offer updates/security patches. Device loans may hinder the individual from practicing skills learned in digital skills programs. An example of this can be seen in the plan on page 41 “Government gives out refurbished Androids which are a waste when people have accessibility issues.”– Statewide workshop participant.

It is unclear how the KPIs under Objective 2 “Device Access-prioritize Covered Populations to achieve a goal of 95%...” will measure if a device has met a person’s needs. Please consider incorporating a survey that measures this.

Strategy 3: Build partnerships and coordinate funding for affordable high-quality broadband service for Covered Populations.

AARP supports Core Strategy 3.1 to explore the use of broadband infrastructure funds and other state funding sources to provide a statewide affordable housing broadband program. AARP commends Core Activity 3.3 to explore funding to sustain ACP or other affordable broadband options. As stated above, AARP maintains affordability remains a key barrier prevent older adults from getting online. AARP recommends the final Plan commit to broader affordable measures, including:

- The Plan could specify that affordability will be a primary criterion for Rhode Island selection of BEAD subgrantees. The extent to which BEAD recipients offer and publicize affordable low-income and middle-income high-speed internet access services is a critically important factor contributing to progress toward digital equity. In the same vein, AARP recommends that Rhode Island consider the extent to which BEAD recipients, and indeed, all service providers offer unbundled high-speed internet access.
- The Plan could observe that municipally owned and operated networks can lead to more affordable high-speed internet services than those offered by for-profit companies.
- Strategy 3 could also include an objective and KPI related to transparency in pricing. Costs of internet subscriptions vary widely, and many users subscribe to bundled services that include television and phone lines along with their internet. The price variations and bundled costs can make it hard to know exactly what a customer is paying for. Promotional pricing and added fees can be a further challenge. Discounted rates are often offered to new customers over a one or two-year period, but rates can jump quickly afterward and catch customers by surprise. Fees associated with installation and equipment, including routers, can also be a deterrent. In 2023, the FCC adopted new rules requiring ISPs to show easy-to-understand labels allowing consumers to shop for the best options and compare plans across ISPs. AARP suggests the Plan promote this new, additional price transparency strategy, at a minimum.

Strategy 4: Leverage digital equity ecosystem to support Rhode Island’s Ongoing Digital Government Initiatives.

AARP supports Core Activity 4.1 to integrate online public resource assistance and feedback into digital inclusion services. AARP recommends incorporating a survey measure that captures covered population confidence in navigating online public resources to effectively track progress over the grant program period.

Strategy 5: Plan for long-term sustainability and continuity of services

AARP highly commends Strategy 5. By placing a high emphasis on fostering successful partnerships, building local capacity, and strengthening the digital equity ecosystem, on-the-ground practitioners and providers who deliver resources and services will have the support needed to sustain digital equity efforts beyond the five-year funding of the Digital Equity Act. AARP believes storytelling and outreach campaigns can build a strong foundation for digital

equity in communities with limited trust or are hesitant to learn new technologies. AARP encourages the final Plan to include a Core Activity to invest in storytelling to secure community buy-in and increase awareness of what a fully connected community can achieve. This activity should reap benefits over the long-term as it shows industry, philanthropy, and government that each will reap the benefits of investment in digital equity programs.

AARP fully supports data-driven, informed policymaking, the sharing of best practices, reliance on the resources and skills of academic institutions, accountability, transparency, and collaboration. AARP commends the Plan committing to crafting an evaluation strategy that features project specific evaluation and impact evaluation. Impact evaluation has great potential to measure social, health, and financial outcomes for covered populations.

As part of Rhode Island's system for measuring outcomes and plan progress, AARP is hopeful that the Plan will:

- Commit to regularly collect, analyze, and report internet access adoption and deployment, by technology and speed, at a geographically granular level so that Rhode Island can monitor the extent to which some communities and some populations may be relying on inferior high-speed internet access.
- Commit, if and as needed, to seek legislative authority to require providers to submit data to assist with the implementation and assessment of the progress of the Plan (e.g., regarding deployment, prices, adoption, speeds, and technology). AARP has engaged in state legislative high-speed internet access advocacy in many jurisdictions throughout the country and is fully prepared to assist with legislative advocacy that would facilitate the division's achievement of digital equity.

To encourage older adults to get online, AARP is hopeful the final Plan will also:

- Commit to provide sufficient resources to senior centers and to organizations that work with aging individuals so that Rhode Island can successfully close age-based digital equity gaps. Also, AARP is hopeful the Plan will explore, where possible, bringing digital equity solutions to where people live – not all aging individuals can travel, for example, to senior centers, libraries and community centers for digital literacy training.
- Recognize that aging individuals include people with a wide range of abilities and potential to navigate high-speed internet access applications. Nonetheless a high-speed internet connection can enhance the lives of all, even those who are not able to tap into internet-based applications without real-time assistance. For that reason, the Plan could acknowledge that high-speed internet access adoption and literacy training programs should also include caregivers so that they, in turn, can facilitate aging individuals' digital connections (videoconferencing with their grandchildren, getting remote health care, watching a movie, etc.) – not all aging individuals – even with training – will be able to navigate internet-based applications on their own yet they can still benefit from having access to internet-based applications, which, with adequate training, their caregivers can facilitate in real-time.

Conclusion

AARP welcomes the opportunity to work with the Corporation and other key stakeholders to help Rhode Island make progress toward its ambitious digital equity goals. Aging individuals overlap with other covered populations -- AARP is fully prepared to partner with other organizations and community-based groups to contribute to achieving digital equity for all. AARP commends Rhode Island on its Draft Digital Equity Plan and respectfully requests consideration of suggestions contained herein be incorporated into the final Plan.