

Matt Schmit
Director, Illinois Office of Broadband
Department of Commerce and Economic Opportunity

January 31, 2024

Dear Director Schmit and the Illinois Office of Broadband,

We are submitting public comment on the Illinois Digital Equity Plan on behalf of the Consortium of Academic and Research Libraries in Illinois (CARLI), Illinois Heartland Library System (IHLS), Reaching Across Illinois Library System (RAILS), and the broader statewide Illinois library community.¹ Our organizations collectively serve and represent ILLINET,² a cooperative library resource sharing network comprising approximately 1,760 public, academic, K-12 school, and specialized libraries in Illinois.

We commend you for a comprehensive Digital Equity Plan rooted in equity. As you know, we are partners in this work through the services offered by our organizations and member libraries, as well as our ongoing engagement with the Broadband Advisory Council, Illinois Broadband Lab, Broadband READY projects, individual counties, and other efforts across Illinois. Many of your objectives are core values of the library field, including:

- equitable access to information and essential services,
- facilitating civic and social engagement,
- supporting learners of all ages, and
- taking multifaceted approaches to digital inclusion.

The National Telecommunications and Information Administration (NTIA) recognizes libraries' "central role in supporting and advancing digital equity, literacy, and inclusion,"³ and encourages states to engage them in planning and implementation as a best practice, echoed by the American Library Association (ALA) recommendation to "leverage libraries' expertise, experience, services, and existing connections at the state and local levels to avoid costly program duplication and accelerate planning, development, implementation, and operational efficiency."⁴ With our shared values in mind, we hope you will consider the following recommendations for further strengthening the draft Digital Equity Plan.

2.2.1 Alignment with other state priorities

First, we encourage you to include the Illinois Secretary of State's office and the Illinois State Library in Table 1: Other state priorities related to broadband (p. 16-20). This is crucial because the Illinois Secretary of State's office has a direct impact on digital equity efforts statewide through the Secretary's role as State Librarian and through the \$62 million the office grants to libraries and library systems. As a department of the Secretary of State's office, the Illinois State Library details three focal points that tangibly demonstrate a reliance on

¹ IHLS and RAILS are multitype regional library systems, established by the Illinois Library System Act ([75 ILCS 10/](#)) and funded by annual system area and per capita grants from the Illinois State Library through the Secretary of State's office with funds appropriated by the Illinois General Assembly. CARLI is supported by the University of Illinois System and serves 128 academic libraries throughout the state.

² <https://www.ilsos.gov/departments/library/libraries/illinet.html>

³ [https://broadbandusa.ntia.doc.gov/sites/default/files/2023-03/How to Engage with Libraries for SBOs.pdf](https://broadbandusa.ntia.doc.gov/sites/default/files/2023-03/How_to_Engage_with_Libraries_for_SBOs.pdf)

⁴

https://www.ala.org/advocacy/sites/ala.org.advocacy/files/content/telecom/broadband/Digital_Equity_Report_110222.pdf

broadband and technology and align with the Digital Equity Plan in their Long Range Plan for the Use of Library Services and Technology Act Funds 2023 – 2027,⁵ which we encourage you to review and include:

- Support for access to information and ideas
- Support for opportunities for education, information fluency, and lifelong learning
- Support for innovation.

2.3 Strategy and Objectives, Table 2

We are pleased to see objective A2a: "all Illinois schools, libraries, and public health-related entities have at least 1 Gbps symmetrical broadband service by 2030." Students and vulnerable residents across Illinois rely on libraries for internet access and technology equipment, but preliminary data analysis and outreach in preparation for the BEAD Mapping Challenge has revealed that the cost of 1 Gbps symmetrical service is not affordable for the majority of Illinois public libraries. We hope you will prioritize libraries in deployment projects and urge you to define and ensure affordability for community anchor institutions. This is particularly important for institutions such as public libraries that are providing essential services largely funded by tax dollars with restrictions on additional revenue streams.

Part 3: Current State of Broadband and Digital Inclusion

We have identified omissions of library contributions throughout Part 3, which covers many activities considered throughout the library industry to be core services. Wonderful examples from our member agencies such as Batavia, Chicago, Geneva, Rockford, and Waukegan public libraries are cited in several areas, while other areas do not mention libraries at all. We believe all ILLINET member libraries should be listed as digital inclusion assets and we have included sample data⁶ and anecdotes to substantiate their contributions. Though detailed data is not collected on all services offered at individual institutions, and the available data varies by type of library, we will be happy to provide additional data and insight upon request to assist with expanding these areas where possible.

3.1.1 Digital inclusion assets by covered population, Table 3

"Technical assistance to support digital inclusion services"

- 59% (381) of public libraries offer digital skills training classes, and 61% (397) of public libraries provide one-on-one assistance.
- Most community college libraries and university libraries also provide some form of technical assistance.
- Library workers are a significant asset to digital inclusion; at least 350 library locations have staff dedicated to technology-related activities.
 - Nearly all libraries have staff at least comfortable or proficient with troubleshooting technology or internet issues.
 - On average, library staff feel good about learning new technology or software (comfort level rated 3 or 4 out of 4).

⁵ <https://www.ilsos.gov/departments/library/grants/pdfs/lstalongrangeplan.pdf>

⁶ Data is from Illinois unless otherwise noted, sourced primarily from the Illinois Public Library Annual Report (IPLAR) (<https://www.ilsos.gov/departments/library/libraries/IPLAR/home.html>), and the Secretary of State's recent Public Library Internet Survey.

"Workforce development training and employment services"

- A national survey conducted by the Public Library Association (PLA) found that 63.5% of libraries provide access to online job and employment resources.⁷
- In addition to the many online career tools purchased with local funds and in-person services provided at individual libraries, our organizations provide libraries with access to negotiated rates and centrally managed subscriptions for tools that support learning, research, and career development.
 - The CARLI E-Resources program provides a wide array of electronic resources to support the curriculum and research needs of their libraries, including the Illinois Digital Heritage Hub, several general research databases and core electronic collections at no additional cost, and an additional 2,604 e-resource subscriptions containing \$25.1 million worth of academic content brokered for 121 libraries.
 - RAILS offers BrainFuse, Gale Udemy, EBSCO Learning Express, and Ferguson's Career Guidance Center to dozens of libraries through our Deals and Discounts program, and works with Career Online High School to support 180 graduates and 108 current students to date.
 - The Illinois General Assembly has appropriated funds for the procurement of full text online subscription databases to be provided to Illinois residents by the Illinois State Library. Coverage will be determined in the coming months and is anticipated to include early learning and education, undergraduate academic resources, newspapers, genealogy, test preparation, and business resources.
- Regional library systems (IHLS and RAILS), along with CARLI, the Illinois Library Association, and other library-serving organizations, are important sources of continuing education and training for the Illinois library workforce, with most opportunities offered at no cost to library workers.

"Public Wi-Fi, networks, and access points"

- Data supplied by the Illinois State Library for the Drive-Up Public Wi-Fi map represent public and academic library agencies providing necessary equipment, bandwidth, and maintenance with local funds, and we suggest listing them individually.
 - 46% of public libraries (296) added external Wi-Fi access during COVID.
 - 44% of public libraries (284) increased their external Wi-Fi access during COVID.
- A total of 584, or 90% of public libraries offer public Wi-Fi, but not all of them fully met the specific parameters for inclusion in the Drive-Up Public Wi-Fi map.

3.1.4 Broadband adoption, Table 6

"Loaner computer/ hotspot programs"

- At least 209 public libraries lend hotspots.
- Additionally, 63 offer e-readers, 129 offer tablets, and 216 offer laptops. The data doesn't specify whether these devices are available for checkout and use outside the library, but it would be safe to assume that at least some of them are.

"Programs that provide digital literacy and digital skills training"

- According to IPLAR, at least 381 public libraries (59%) offer digital skills training.
- According to the Secretary of State's Public Library Internet Survey:

⁷ <https://www.ala.org/pla/sites/ala.org.pla/files/content/data/PLA-2020-Technology-Survey-Summary-Report.pdf>

- 85% of library locations offer programming or training, either formally or informally, on basic digital literacy tasks, and
- 192 offer formal training about one or more of the topics of telehealth, remote learning, online forum discussions, streaming, coding, and online legal assistance.

"Public computing labs"

- Hundreds of computers in Illinois public, community college, and university libraries are available to the public.
- 621 public libraries (96%) have publicly accessible computers in their facilities.

"Digital Navigator programs"

- In addition to the digital navigator programs offered at agencies like Chicago Public Library and Waukegan Public Library, one-on-one technical assistance has routinely been provided at libraries since before the "digital navigation" moniker existed.
 - 61% (397) of public libraries provide one-on-one tutorials.
- We believe there is significant potential to formally align library approaches to technical assistance with a burgeoning digital navigator program and look forward to discussing further with the Illinois Broadband Lab and other stakeholders.

3.1.6 Gaps in asset inventory

We concur with your observation that "closing gaps in coverage and program availability will be insufficient if capacity gaps remain unaddressed" (p. 145). Currently, budget constraints limit many libraries' capacity to offer the vital digital education, technology, and programming their communities need. Libraries typically fund existing programs as generously as possible within their available resources, but libraries in underserved and unserved communities often operate on especially meager budgets. Thus, ongoing, future-focused capacity building will ensure robust and sustainable internet access, public computing, device lending programs, and digital skills training in libraries. One-time grants and device donations alone do not provide the increases in operating revenue that may be needed to maintain and replace equipment, ensure personnel for training classes and other events, maintain sufficient open hours, and support continuing advanced learning for employees.

3.2.3 Covered Population Needs Assessment

Libraries serve all covered populations at all stages of life, and the types of barriers experienced by these residents often lead them directly to library resources, where capacity is limited and must be addressed by digital equity and broadband expansion funding. Public library funding is often dependent on property tax revenue, which further restricts libraries' capacity to serve covered populations in areas impacted by redlining and other structural and economic barriers. The Pew Research Center found in 2015 that "for lower-income Americans and those who are members of communities of color, libraries have a special role as places to learn new job skills, explore new digital technologies and provide services to them or their community."⁸

Assistive technology and other approaches to greater accessibility for disabled residents are also crucial to digital equity, in libraries and far more broadly, and we suggest embedding this principle more deeply into the Plan and its implementation.

⁸ <https://www.pewresearch.org/internet/2015/09/15/lower-income-americans-and-communities-of-color-more-likely-to-see-libraries-as-community-anchors/>

4.1.4 Collaborating partners in BEAD and DE programs

You state, "The [Illinois Office of Broadband] partners with the ILLINET in its stakeholder engagement efforts to market local events and support community members participating in the online survey" (p. 234) and "The IOB partners with the Office of the Secretary of State, which houses the Illinois State Library. The Illinois State Library supports the state in conducting its stakeholder engagement process by connecting the IBL with local libraries. These libraries serve as a marketing channel to Illinois residents who frequent these community institutions" (p. 235).

Acknowledging the importance of these activities and the value of this open communication channel, we wish to provide clarification to serve our ongoing collaborations. Your list omits regional library systems (IHLS and RAILS, along with the Chicago Public Library System), which are separate organizations charged by the Illinois State Library and the Library System Act with serving, representing, and facilitating the alliance of individual library organizations known collectively as ILLINET. In this capacity we've partnered with the IOB and IBL to serve as a marketing channel to local libraries as well as other library-serving organizations, ensuring they are informed of opportunities to participate in and reach residents with surveys and stakeholder engagement events, along with other important messages about digital equity and broadband-related activities and funding. We look forward to continuing this collaboration.

We also invite you to take a more expansive perspective on how local libraries, regional library systems, and statewide library organizations can serve as collaborating partners beyond channeling marketing messages. As detailed in this letter, library organizations advance digital equity through a broad range of activities, collectively and individually, and can make significant contributions toward facilitating and strengthening the Digital Equity Plan implementation.

5.1.1.1 Digital equity source of truth

We can supply useful library data for the asset inventory, including the Illinois Public Library Annual Report and directory information for all ILLINET libraries (public, school, academic, and specialized), including accurate legal names, addresses, and other critical information for each institution.

5.1.1.2 State and university partnerships - Digital Navigator Program

In your work to "identify local digital equity barriers and to launch programs and services that address unique local needs" (p. 248), we encourage you to specifically mention and plan to actively partner with public and community college libraries. These agencies are already doing this work in their communities and can leverage their existing awareness of community needs, service models, digital skills curricula, patron relationships, community partnerships, facilities, equipment, and mobile outreach activities. Additionally, IHLS and RAILS may be able to serve as resources for regional coordination and training.

5.1.1.3 Digital Equity Competitive Grant program

Given the significant overlap between library services and the range of potential programs cited in the Digital Equity Plan, we suggest that you require applicants to include libraries in their projects or, at a minimum, review existing local library services to avoid duplication of effort and identify potential partnerships. Libraries are an essential link to social programs and government services via the technology and internet connections they offer and through the direct efforts of library workers and their connections with residents and community organizations. They should be considered as primary potential grantees and collaborative partners.

As you develop the reporting mechanisms for the grant program, we also encourage you to consider the importance of preserving library patron privacy and confidentiality as affirmed by the ALA Library Bill of Rights⁹ and regulated by the Library Records Confidentiality Act¹⁰.

5.1.1.4 Stakeholder engagement

We ask you to engage local libraries and regional library systems (IHLS and RAILS) on the ground floor of the planning process to fully benefit from their community reach and ability to contribute to engagement efforts. Community engagement is foundational to library operations, and while we can continue to help promote opportunities, we can also provide high quality insight into the stakeholder engagement process. Library facilities are also vibrant community gathering places and can provide meeting spaces in many cases; 519 public libraries (80%) have meeting rooms, 339 (52%) have study rooms, and 524 (81%) have at least one of the two.

5.1.1.5 Community of Practice

Our organizations would welcome the opportunity to help establish and build library engagement in communities of practice, library-specific or otherwise.

Thank you for your consideration of this feedback. We look forward to further collaboration with your office and invite you to reach out directly for follow-up on this letter or any other matters where we may be of assistance.

Sincerely,



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⁹ <https://www.ala.org/advocacy/intfreedom/librarybill>

¹⁰ <https://www.ilga.gov/legislation/ilcs/ilcs3.asp?ActID=1004&ChapterID=16>