



April 27, 2023

Stephanie Weiner  
Acting Chief Counsel  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue NW  
Room 4878  
Washington, D.C. 20230

RE: Digital Equity Act of 2021 Request for Comments (NTIA-2023-0002)

Dear Acting Chief Counsel Weiner,

On behalf of the Coalition to End Social Isolation and Loneliness (the Coalition), we appreciate the opportunity to provide input on the Digital Equity Act of 2021 Request for Comments.<sup>1</sup> Established in 2018, the Coalition brings together a diverse set of national organizations including consumer groups, technology innovators, health care providers, patient advocates, and health plans to develop and advocate for federal policy solutions to address the issues of social isolation and loneliness in the United States. With a comprehensive [policy agenda](#) that focuses on public awareness, social and health services, technology, and research, the Coalition works to combat the adverse health effects of social isolation and loneliness and advance approaches that improve social connectedness for all Americans through targeted and evidence-based policy recommendations.

### **The Value of Digital Equity for Covered Populations**

The Coalition commends the National Telecommunications and Information Administration (NTIA) for its long-standing commitment to promoting equity, access, and civil rights through equitable information technology systems. As NTIA described in the request for comments, COVID-19 brought to light the need for high-speed internet access for all Americans to fully participate in modern economy and society. As such, we strongly support NTIA's requirement that Digital Equity grant programs include low or no-cost technologies and digital literacy education.

Evidence shows that barriers such as affordability and digital literacy, including user comfort, prevent significant numbers of older adults from accessing and utilizing digital tools and broadband. In addition, there are disparities seen across different racial, ethnic, and socioeconomic groups with respect to successfully implementing digital technology. Investments in national connectivity plans, municipal broadband networks, and education systems are needed to provide older and underrepresented racial and ethnic populations the resources to maximize digital technology uptake.<sup>2</sup>

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<sup>1</sup>[88 FR 13101](#)

<sup>2</sup> Ruth M. Tappen, et al., Digital Health Information Disparities in Older Adults: a Mixed Methods Study, 9 J. RACIAL. ETHN. HEALTH DISPARITIES 82 (Jan. 7, 2021)  
<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC7790471/>.



Similarly, Americans dealt with widespread impacts on mental health, social isolation, and loneliness as individuals struggled to manage new health, economic, and social stresses caused by the pandemic. More than half of Americans (58 percent) reported being lonely in 2021, an increase from 46 percent in 2018.<sup>3</sup>

The covered populations and underrepresented communities targeted by the Digital Equity Act programs encompass the same groups that are at high risk for social isolation and loneliness, including veterans, individuals with disabilities, rural communities, older adults, and underrepresented racial groups. For example, 75 percent of Hispanic adults and 68 percent of Black adults were classified as lonely in 2021.<sup>4</sup> Given these parallels, our input and recommendations serve to not only illuminate the importance of greater technological integration, but also help NTIA implement the Digital Equity Act programs in a manner that allows community members to effectively harness the opportunities for integration and companionship provided by access to technology and internet services, and protect against the potential for harms and social isolation.

Recent advances in technologies and innovative solutions hold the promise to connect individuals with loved ones, services, and programs. Continued innovation in affordable access to and uses of telehealth, social media, services, assistive devices, and other consumer solutions holds great potential for addressing social isolation and loneliness. An analysis of over 60,000 individuals aged 50 or older found a significant association between internet use and decreased loneliness.<sup>5</sup> In addition, among older adults, more frequent internet use is associated with reduced depression levels in individuals both cross-sectionally and longitudinally.<sup>6</sup> In our policy priorities, the Coalition advocates for fostering public-private and cross-agency partnerships to develop a plan to provide equity in access to effective technologies to individuals who are at high risk for social isolation, through family-centered and multi-generational approaches.<sup>7</sup>

However, we recognize that technology may lead to an increase in an individual's sense of isolation, particularly among teens and younger adults. A recent survey of teen social media use found that nearly one-third believed social media had a negative effect on their peers, and over a quarter of teen girls reported social media made them feel worse about their own lives.<sup>8</sup> Given the differing impacts and outcomes associated with internet use across different populations, a one-size approach may not be sufficient to advance NTIA's goals and meet communities' social connection needs. **The Coalition, therefore, recommends that NTIA ensure that intervention strategies that promote internet access also facilitate social connection.** We further recommend that evaluation strategies examine which technologies, digital tools, or usages promote and facilitate social connection and which exacerbate social isolation and loneliness.

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<sup>3</sup> The Cigna Group [The Loneliness Epidemic Persists: A Post-Pandemic Look at the State of Loneliness among U.S. Adults.](#)

<sup>4</sup> Ibid.

<sup>5</sup> Patrícia Silva, Alice Delerue Matos & Roberto Martinez-Pecino (2022) Can the internet reduce the loneliness of 50+ living alone?, *Information, Communication & Society*, 25:1, 17-33, DOI: 10.1080/1369118X.2020.1760917

<sup>6</sup> Cotten SR, Ford G, Ford S, Hale TM. Internet use and depression among retired older adults in the United States: a longitudinal analysis. *J Gerontol B Psychol Sci Soc Sci*. 2014 Sep;69(5):763-71. doi: 10.1093/geronb/gbu018.

<sup>7</sup> [CESIL 2023-2024 Policy Priorities](#)

<sup>8</sup> Pew Research Center, November 2022, [Connection, Creativity and Drama: Teen Life on Social Media in 2022](#)



## **Harnessing Technology to Promote Social Connection**

To leverage the Digital Equity Act programs to help address the social isolation and loneliness crisis, the Coalition respectfully offers comments on the following questions:

- **What additional guidance/resources should NTIA provide to States, Territories, and Tribal entities as they develop their Digital Equity Plans?**
- **How should NTIA define success for the Capacity Grant Program?**
- **How should NTIA define success for the Competitive Grant Program?**
- **How can NTIA encourage and measure the effects of investments in our youth and young adults?**

### **What additional guidance/resources should NTIA provide to States, Territories, and Tribal entities as they develop their Digital Equity Plans?**

In addition to the current guides and resources for States, Territories, and Tribal entities, the Coalition recommends that NTIA provide guidance and technical assistance that help these entities incorporate tools or measures directly related to social isolation, loneliness, and social connection. The Systems of Cross-sector Integration and Action across the Lifespan (SOCIAL) Framework published by the Foundation for Social Connection, our sister organization, recommends that government agencies develop a consistent, evidence-based set of benchmarks and measures related to social isolation, loneliness, and social connection.<sup>9</sup> The Coalition and the Foundation are currently working with the leaders of Healthy People 2030, the national Equitable Long-Term Resilience and Recovery initiative, and other relevant stakeholders to develop a set of measures for all federal programs to use.

While that consensus is established, there are several validated assessment tools that NTIA could consider recommending. Ongoing evaluation of the levels of social isolation, loneliness, and social connection within targeted communities would inform NTIA and States, Territories, and Tribal entities of their baseline and progress towards realizing the joint goals of access to the internet and facilitating social connection. While some states, such as Pennsylvania, have already begun to highlight the potential for their broadband initiatives to support social connections, these plans generally do not incorporate robust evaluation tools and methods for states to measure how their own initiatives have impacted their populations.<sup>10</sup> Additionally, data from these evaluations could then also inform efforts to allocate resources to communities for related initiatives, including the Affordable Connectivity Program.

### **How should NTIA define success for the Capacity Grant Program?**

NTIA should consider including metrics related to social isolation, loneliness, and connection to help define success for the Capacity Grant Program. These would enable NTIA to quantify and connect the impact of technology, access, and infrastructure on community members. This additional analysis will be vital in grasping a holistic perspective of the impacts of the Capacity Grant Program.

### **How should NTIA define success for the Competitive Grant Program?**

The Coalition recommends that NTIA also consider including metrics for social isolation, loneliness, and social connection in the community-wide surveys for the Competitive Grant Program. We believe that investments in community environments, infrastructure, and technologies, including enhanced broadband infrastructure will develop accessible community spaces and platforms for individuals to gather and form social connections. By comparing these additional data between covered and non-covered populations, NTIA

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<sup>9</sup> Foundation for Social Connection [SOCIAL Framework: The Work, Employment, & Labor \(WEL\) Sector](#)

<sup>10</sup> Pennsylvania Dept. of Community and Economic Development: [Statewide Broadband Plan November 2022](#)



will be able to gain additional insights into which population(s) may struggle with relatively high levels of social isolation and loneliness, and therefore may potentially most benefit from the additional digital infrastructure and supports provided by the grant population.

**How can NTIA encourage and measure the effects of investments in our youth and young adults?**

The Coalition agrees with the NTIA’s analysis that the COVID-19 pandemic has had a particularly devastating impact on youth mental health. Youth and young adults have increasingly high rates of social isolation and loneliness, more than twice the rate of older adults. In addition, recent data show that, 79 percent of adults aged 18 to 24 report feeling lonely compared to 41 percent of seniors aged 66 and older.<sup>11</sup> By evaluating how investments in internet access and technology shape youth and young adults’ feelings of social isolation, loneliness, and social connection, NTIA can gain unique insights into these critical drivers of health and well-being.

**Conclusion**

The investments made by the Bipartisan Infrastructure law into the Digital Equity Act grant programs are a historic opportunity for the NTIA to close longstanding digital divides which drive adverse health, economic, and social outcomes. Thoughtful investments and infrastructure can help encourage social connection for all Americans, particularly those most at-risk for social isolation and loneliness.

We appreciate the opportunity to provide input for consideration in the implementation of Digital Equity Act programs and welcome discussing these recommendations with you further. Please do not hesitate to reach out to the Associate Vice President for Advocacy, Daneen Sekoni ([dsekoni@healthspieren.com](mailto:dsekoni@healthspieren.com)), with any specific questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Am', is positioned above the typed name.

Andrew MacPherson  
Founder and Chairman

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<sup>11</sup> The Cigna Group [The Loneliness Epidemic Persists: A Post-Pandemic Look at the State of Loneliness among U.S. Adults.](#)