



February 16, 2021

Ms. Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: [In the Matter of Emergency Broadband Benefit Program, WC Docket No. 20-445](#)

Dear Ms. Dortch:

Thank you for the opportunity to submit a reply to comments on the Emergency Broadband Benefit (EBB) Program. The inclusion of broadband subsidy eligibility for Pell Grant recipients in the EBB Program was a welcome addition.¹ Many Americans struggle accessing reliable and affordable broadband, and as experts in higher education policy we know that is true for many students in college — particularly the approximately 7 million low-income students who receive Pell Grants.

Low-income college students are unable to reliably access high-quality broadband for the classes for which they are paying—and borrowing. Pell students graduate college at a lower rate compared to their more affluent peers and the pandemic is exacerbating these disparities. A survey commissioned by New America found that the lack of technology or internet access has already led a substantial share of community college students to drop out of college during the pandemic.² Implementing this program both quickly and effectively so that these students can access this benefit will help low-income students complete this semester, and eventually their degree.

[Verification of Pell Grant Receipt](#)

We recognize that verification of Pell Grant receipt is a hurdle for implementation. To verify eligibility based on receipt of a Pell Grant in the current award year (which runs July 1 to June 30) according to the law, we recommend that the FCC immediately pursue a **data match with the U.S. Department of Education**. We continue to believe that utilizing existing administrative data held by the Education Department will provide the least burdensome process for students to meet the verification requirements.

¹ Iris Palmer and Wesley Whistle, “Spending Deal Supports Broadband Access for College Students,” New America, *EdCentral*, January 12, 2021, <https://www.newamerica.org/education-policy/edcentral/spending-deal-supports-broadband-access-colleg-e-students/>

² Rachel Fishman and Sophie Nguyen, “Where Did All the Students Go?: Understanding the Enrollment Decline at Community Colleges During the Pandemic,” New America, *EdCentral*, January 14, 2021, <https://www.newamerica.org/education-policy/edcentral/community-college-enrollment-survey/>

However, the time required to facilitate data-sharing agreements should not delay students from accessing this benefit. Until data-sharing agreements are secured, we ask that the FCC adopt a wide range of options for verification documentation as proposed by many higher education experts in their comments, including the four we mentioned in our previous comment:³

1. Written or electronic confirmation from students' institutions of higher education that students received Pell Grants in the current award year.
2. Copies of the Student Aid Report indicating Pell Grant receipt in the current award year.
3. Official financial aid offer letters, provided by the institution to the student, demonstrating students' receipt of a Pell Grant in the current award year.
4. Copies of paid invoices documenting the student's receipt of a Pell Grant in the current award year.

However, the need to ensure students can access broadband to complete their education is urgent. For that reason, we agree with others, including internet providers like T-Mobile and Verizon, that flexibility is particularly warranted for rapid delivery of the benefit until data-matching can be successfully accomplished. Verizon recommended that those enrolled in the free or reduced price school lunch program be able to self-verify their eligibility. If the FCC agrees, we recommend that the same flexibility be extended to Pell Grant recipients. Pell students should not be subject to onerous paperwork that sends them to the back of the line, given the challenges facing low-income college students as they struggle—and take on debt—to succeed in postsecondary education during the pandemic. Equity in application processing is particularly important given the fiscal nature of this program; the program's \$3.2 billion appropriation may be drawn down rapidly, given extraordinary need across the country.

Conclusion

We again thank the FCC for the opportunity to comment and for its commitment to ensuring low-income college students are able to “meaningfully access and participate in remote learning during the COVID-19 pandemic.”⁴ We believe the above-proposed options for verification will ensure that students can access broadband subsidies in the short-term, as well as avert the risk of waste, fraud, and abuse among applicants.

Sincerely,

Amy Laitinen
Director of the Higher Education Program, New America

³ Comments of New America and the State Higher Education Executive Officers Association (SHEEO), filed January 25, 2021. Others include: the National College Attainment Network (NCAN), Higher Learning Advocates, the Institute for Higher Education Policy (IHEP), the National Association of Student Financial Aid Administrators (NASFAA), and more.

⁴ “Public Notice: Wireline Competition Bureau Seeks Comment on Emergency Broadband Connectivity Fund Assistance,” Federal Communications Commission, WC Docket No. 20-445, January 4, 2021, <https://docs.fcc.gov/public/attachments/DA-21-6A1.pdf>