



January 25, 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 comments on the emergency broadband connectivity assistance included in the Consolidated Appropriations Act of 2021, signed into law on December 27, 2020. We were pleased to see that this legislation includes broadband subsidies for qualifying low-income households through the Emergency Broadband Benefit Program, and particularly that Pell Grant recipients are, for the first time, deemed eligible for the program.<sup>1</sup>

While there has been much important news coverage of the ways in which PreK-12 students are being left behind as a result of poor broadband access, less attention has been paid to the millions of low-income college students who are also unable to reliably access high-quality broadband for classes for which they are paying—and borrowing. A survey commissioned by New America, described below, found that the lack of technology or internet access has led a substantial share of community college students to drop out of college during the pandemic.

As experts in higher education policy, we write to encourage the FCC to implement this provision in a way that places the lowest possible burden on low-income college students to ensure that they are able to quickly access broadband.

### Background on Low-Income College Students

To be eligible for a Pell Grant, students must first complete the Free Application for Federal Student Aid (FAFSA) and receive a determination of aid eligibility. The program, which has existed since the 1970s, serves around 7 million students each year. Those students are overwhelmingly very low-income; approximately two-thirds have an annual income of \$30,000 or less, and nearly half

---

<sup>1</sup> 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-college-students/>

earn \$20,000 per year or less.<sup>2</sup> Half are independent students, meaning they are older than 24, married, have dependents, or meet certain other markers of non-traditional students.<sup>3</sup> Need-based grant programs, like the Pell Grant program (which funds students at a maximum of about \$6,000 each year in grant aid), has been demonstrated to increase enrollment in higher education, improve persistence rates, and increase rates of graduation.<sup>4</sup>

The effects of the COVID-19 pandemic on low-income college students drive home why this policy must be implemented quickly, efficiently, and simply. Nearly one-third of Pell Grant recipients are enrolled at public two-year (community) colleges.<sup>5</sup> This fall, community colleges reported a drop in enrollment of almost 10 percent.<sup>6</sup> These public, two-year colleges serve many of the nation's lowest-income students, as well as a substantial share of adult students and students of color.

Their students have been particularly hard-hit during the pandemic. To learn how, New America commissioned Lake Research Partners to conduct a community college enrollment survey in December 2020. The study found that students who stopped out of their community college program did so largely for financial reasons, including nearly one in five who said a lack of technology or internet access to take classes online prevented them from continuing.<sup>7</sup> This is particularly concerning in light of data showing millions of students with some college experience but no credential, some of whom are left holding debt with no degree.

In short, given the urgent need for students to be able to re-enroll in higher education, it is incumbent upon the FCC to make sure they are able to access the technology subsidies provided for under this law as easily as possible.

## Verification of Pell Grant Receipt

The law includes in Pell Grant eligibility anyone who has received a federal Pell Grant in the current award year (which runs July 1 to June 30). Eligibility may be verified through the National Verifier or the National Lifeline Accountability Database administered by the FCC; or providers may rely upon alternative verification processes, if approved by the FCC.

---

<sup>2</sup> "Congressional Justifications," Student Financial Assistance, U.S. Department of Education, Fiscal Year 2021 Budget Request, May 2020, <https://www2.ed.gov/about/overview/budget/budget21/justifications/p-sfa.pdf>, page P-20.

<sup>3</sup> Ibid

<sup>4</sup> Spiros Protopsaltis and Sharon Parrott, "Pell Grants—A Key Tool for Expanding College Access and Economic Opportunity—Need Strengthening, Not Cuts," Center on Budget and Policy Priorities, July 27, 2017, <https://www.cbpp.org/research/federal-budget/pell-grants-a-key-tool-for-expanding-college-access-and-economic-opportunity>

<sup>5</sup> "Congressional Justifications," Student Financial Assistance, U.S. Department of Education, Fiscal Year 2021 Budget Request, May 2020, <https://www2.ed.gov/about/overview/budget/budget21/justifications/p-sfa.pdf>, page P-21.

<sup>6</sup> 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/>

<sup>7</sup> Ibid

## Match Data with the U.S. Department of Education

We believe the least-burdensome process for verification will be to utilize existing administrative data held by the Department of Education. Specifically, the FCC should immediately begin the process of entering into a computer matching agreement with the U.S. Department of Education to exchange data held by the Department on Pell Grant receipts.

The Education Department holds Computer Matching Agreements with numerous other agencies, including:<sup>8</sup>

- The Selective Service System (to verify the registration of FAFSA applicants);
- The Department of Homeland Security (to verify citizenship status of FAFSA applicants);
- The Department of Justice (to verify drug convictions);
- The Department of Housing and Urban Development (to assess delinquent debts);
- The Social Security Administration (to verify Social Security numbers and immigration status, and to identify borrowers who are totally and permanently disabled for discharge eligibility);
- The Department of Veterans Affairs (to verify veteran status of FAFSA applicants, and to identify borrowers who are totally and permanently disabled for discharge eligibility); and
- The Department of Defense (to identify the children of military personnel who have died as a result in military service in Iraq or Afghanistan since September 11 for grant eligibility, and to identify borrowers eligible for imminent danger pay and hostile fire pay for student loan benefits).

Another data-sharing agreement, this time with the FCC, will be the simplest way to provide the FCC with the very basic information needed to verify eligibility for broadband access benefits.

## Alternative Verification for Providers

To ensure multiple avenues are available to students in need of these benefits, as quickly as possible, the FCC should **also** approve multiple forms of documentation from students. This will be especially critical as the FCC and the Department work to establish a data-sharing agreement, so that students are not forced to wait in the meantime. These forms of documentation should include, at a minimum, the three types listed below.

---

<sup>8</sup> “Department of Education’s Computer Matching Agreements,” U.S. Department of Education, Office of Management, Privacy Safeguards Division, Last Modified June 8, 2020, <https://www2.ed.gov/about/offices/list/om/pirms/cma.html>

Importantly, all of these forms of verification should be considered acceptable. The U.S. higher education system is highly decentralized, with thousands of colleges operating largely independently and utilizing systems and processes that differ widely across campuses. Institutions have differing capacity and resources, organizational structures, and modalities and formats. Simply put, a one-size-fits-all solution to alternative verification will not work, because this verification will necessarily differ drastically across institutions. By providing students with a menu of options that they can utilize to verify their status as Pell Grant recipients, the FCC will ensure minimal burden on colleges and their students.

**1. Written or electronic confirmation from students' institutions of higher education that students received Pell Grants in the current award year.**

Pell Grant dollars are awarded to students via their institutions of higher education, meaning that institutions hold the needed information to confirm that their students received Pell Grant eligibility. Students should be permitted to obtain and submit documentation from their institutions of Pell Grant receipt for the current award year.

**2. Copies of the Student Aid Report indicating Pell Grant receipt in the current award year.**

All students, upon completing the FAFSA, receive a student aid report detailing their eligibility for federal financial aid, including Pell Grants. The SAR is typically available to the student very quickly, within a week or two of completing the FAFSA, at most. It is also available to students electronically (if they include an email address on the FAFSA) or in paper form, via mail (if they don't); and students who need another copy of the student aid report may find it by logging into [fafsa.gov](https://fafsa.gov) or by calling the help line at the Office of Federal Student Aid for the Department of Education.

**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.**

Many institutions provide applicants to their institution with a "financial aid offer letter," which demonstrates the federal, state, and/or institutional eligibility for the student in a given award year. While financial aid offer letters are inconsistent from institution to institution,<sup>9</sup> students who have such documentation should be able to use it to verify eligibility for the broadband access benefits. Additionally, thousands of institutions participate in the Education Department's voluntary initiative termed the College Financing Plan (previously known as the Financial Aid Shopping Sheet), which standardizes the aid information provided to students. This version of a financial aid offer, if provided to students, should also qualify as valid documentation.

---

<sup>9</sup> Stephen Burd, Rachel Fishman, Laura Keane, Julie Habbert, Ben Barrett, Kim Dancy, Sophie Nguyen, and Brendan Williams, "Decoding the Cost of College: The Case for Transparent Financial Aid Award Letters," *New America* and *uAspire*, June 5, 2018, <https://www.newamerica.org/education-policy/policy-papers/decoding-cost-college/>

**4. Copies of paid invoices documenting the student's receipt of a Pell Grant in the current award year.**

Institutions also provide invoices and billing receipts to students demonstrating their tuition charges and how their charges are repaid. Where invoices or receipts document receipt of a Pell Grant (either for institutional charges like tuition or dorms, or for non-institutional charges like books and supplies or living expenses), the student should be able to use that information to verify their Pell Grant status.

## 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.”<sup>10</sup> We believe the above-proposed options for verification will ensure accuracy in the awarding of broadband subsidies; avert the risk of waste, fraud, and abuse among applicants; and provide critical benefits to a set of Americans very much in need of affordable access to stable broadband.

Sincerely,

Amy Laitinen  
Director, Higher Education Program  
New America

Robert Anderson  
President  
State Higher Education Executive Officers Association

---

<sup>10</sup> “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>