

Commission's Secretary
Office of the Secretary
Federal Communications Commission
45 L Street, NE
Washington, D.C. 20554

Re: Docket WC Docket No. 20-445

To Whom It May Concern:

On behalf of Higher Learning Advocates, a nonprofit organization that supports and advances policy changes to support a system of higher learning that is student-centered, equitable, outcomes-based, and focused on educational quality, I am writing to comment on the notice seeking public comment on the implementation of the Emergency Broadband Connectivity Fund Assistance initiative.

The *Consolidated Appropriations Act, 2021*, established the \$3.2 billion broadband subsidy program for qualifying low-income households known as the Emergency Broadband Benefit Program. This program will reimburse participating carriers for the retail cost of broadband Internet service and certain connected devices provided to eligible low-income households, including those which contain a student who has received a Pell Grant for the current award year. HLA believes that the inclusion of students who have received Pell Grants is critical, especially as the pandemic continues. Pell recipients already graduate at lower rates than non-Pell recipients and face many financial barriers to succeeding in higher education, even before the pandemic and widespread online learning. Ensuring that students receiving Pell Grants have access to affordable broadband Internet and devices is essential to their success.

The legislation defines "eligible household" as any household with at least one member who (1) is qualified to participate in the federal Lifeline program; (2) is qualified to participate in the free and reduced price lunch program; (3) has experienced a substantial loss of income since February 29, 2020 that is documented by layoff or furlough notice, application for unemployment insurance benefits, or other similar document; (4) has received a Federal Pell Grant in the current award year; or (5) meets the eligibility criteria for a participating provider's existing low-income or COVID-19 program. Eligibility is to be verified through the National Verifier or National Lifeline Accountability Database administered by the FCC, or a participating provider can rely upon an alternative verification process if such process is approved by the FCC.

Your agency proposes a series of approaches for the verification of eligibility for households. While HLA believes that the inclusion of Pell Grant students for this subsidy is extremely important, we also acknowledge that in this initial notice, the FCC provides little direction as to how Pell Grant receipt will be verified. We therefore urge FCC to provide further clarity on how Pell Grant status can be verified expeditiously and accurately by Internet Service Providers and how the FCC can expedite such verification to support students swiftly.

To support the verification process, it is crucial that the FCC pursue a computer matching agreement with the U.S. Department of Education (ED) to verify eligibility and to provide streamlined verification processes that maximize eligibility while ensuring the financial integrity of the Emergency Broadband Connectivity Fund. FCC should immediately begin the process to enter into a data matching agreement with ED that would permit the sharing of Pell Grant status

between the two agencies for the purposes of verifying eligibility to participate in the Emergency Broadband Benefit program.

In absence of a data matching agreement with ED, internet service providers should be able to verify students have received a Pell Grant and are, therefore, eligible for the broadband benefit through the following menu of options:

1. Providers should be able to accept written or electronic confirmation from a student's Institution of Higher Education (IHE) that the student has received a Pell Grant for the current award year;
2. Providers should be able to accept a student's official financial aid award letter documenting the amount of a student's Pell Grant award received for the current year;
3. Providers should be able to accept a copy of a paid invoice from a student that clearly documents the student's receipt of a Pell Grant during the current award year;
4. Providers should be able to accept a copy of a student's Student Aid Report that clearly documents the student's receipt of a Pell Grant during the current award year; and

The submission of the documentation described above should be recognized upfront by the FCC as an alternative means of verification through Internet Service Providers that meets statutory requirements. This upfront recognition would eliminate the need for providers to seek FCC approval for verification on a case-by-case basis.

In closing, we urge the FCC to provide clarification and adopt our recommendations to ensure that Pell Grant status can be verified expeditiously and accurately by providers in order to allow students to access the broadband benefit as soon as possible as access to the Internet and connected devices is essential to student success. Thank you for the opportunity to comment on this notice.

Sincerely,

Julie Peller

Executive Director