

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

January 21, 2021

RE: Emergency Broadband Fund Benefit Program, WC Docket NO. 20-445

Dear Secretary Dortch,

Wider broadband internet access is a necessity if we are to see a just and equitable society with equal opportunity for all. In particular, broadband internet is more critical to student success than ever before. But for too many of our nation's college students, at-home broadband has been unavailable or prohibitively expensive. As the COVID-19 pandemic has increased substantially the number of colleges and universities using exclusively online or hybrid instructional methods, this challenge is even more acute. Students from low-income backgrounds need access to high-quality, reliable broadband internet services at an affordable price.

We at the Institute for Higher Education Policy (IHEP)—a nonprofit, non-partisan research, policy, and advocacy organization that promotes college access and success for historically underserved students—are grateful that federal policymakers have recognized the importance of broadband internet access for college students and the urgency of this need. The *Consolidated Appropriations Act, 2021* made households with a member receiving a federal Pell Grant eligible for the Emergency Broadband Benefit Program, the first time this type of benefit has been made available specifically for low-income college students.

Given the new eligibility of this population for federal broadband support and the urgent need to connect these students, it is critical that the FCC clearly communicate how students and families can verify their Pell Grant receipt to receive the emergency broadband benefits. This guidance should minimize burden for students and families and minimize delay in verification of eligibility, while ensuring the integrity of the program.

We offer the following recommendations to expedite and streamline the alternative verification process for students who receive Pell Grants:

1. Broadband providers (Providers) should be able to accept written or electronic confirmation from a student's Institution of Higher Education (IHE) that the student has been awarded 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 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
5. The FCC should immediately begin the process to enter in a computer matching agreement with the U.S. Department of Education (ED) that would permit the sharing of Pell Grant receipt between the two agencies for the purposes of verifying eligibility to participate in the Emergency Broadband Benefit program.

If you have any questions about these recommendations, please me at mvoight@ihep.org or 202-587-4967.

Sincerely,

Mamie Voight
Senior Vice President of Research and Policy
Institute for Higher Education Policy (IHEP)