



Kim Cook
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25 January 2021

Marlene. H. Dortch, Secretary
Office of the Secretary
Federal Communications Commission

Ms. Dortch:

Thank you for the opportunity to submit comments on WC-Docket No. 20-445 to address how participating providers in the new Emergency Broadband Connectivity Fund should verify that a household is eligible to participate based on the receipt of a federal Pell Grant. I am writing on behalf of the members of the National College Attainment Network (NCAN), hundreds of nonprofits, schools, and colleges around the country that help millions of students beat the odds and complete postsecondary education.

Equity gaps remain in postsecondary education, with students from low-income backgrounds only half as likely to complete a postsecondary certificate or degree by age 26 as a high-income student. Moreover, students of color and those who are the first in their families to attend college experience disproportionately lower rates of postsecondary success.

Unfortunately, the current pandemic has only exacerbated the challenges that our students face. The ability for our students from low-income backgrounds to access the internet and supporting devices is crucial to their ability to succeed in higher education. The inclusion of Pell Grant eligibility as a qualifier for participation in this program is a welcome addition to eligible household determination.

Pell grant recipients must complete the Free Application for Federal Student Aid (FAFSA) in order to receive the need-based Pell Grant. Given that the U.S. Department of Education Office of Federal Student Aid already has their qualification for this need-based aid on file, the best option would be for ED and the FCC to use a data computer matching agreement to verify Pell Grant receipt with possible options including the Common Origination and Disbursement (COD) System or the National Student Loan Database System. Additionally, it is important that the matching happen on a regular basis, not a once and down upload, as those Pell recipients in those databases change regularly. Further, it is of utmost importance that FSA and the FCC quickly develop this agreement so that postsecondary students are able to participate in a timely manner.

In the interim until this agreement is established, and to provide a pathway for students who may not be part of the most recent data batch shared, NCAN strongly recommends the option for streamlined

alternative verification processes permitted in the law that ensure the financial integrity of the program. We recommend the following options for alternative verification of Pell Grant receipt:

1. Providers should be able to accept written or electronic confirmation from a student's Institution of Higher Education (IHEs) 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 students' 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

Given the profound challenges students are currently facing, including reduced enrollment with technology barriers as a factor, it is crucially important to implement this program as quickly as possible. For this reason, 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. We strongly urge the consideration of the four alternatives above until the completion of an FCC to ED matching agreement can be implemented.

Thank you for your time and the opportunity to provide these comments.

Sincerely,

Kim Cook

Executive Director