



1/22/2021

Wireline Competition Bureau
Federal Communications Commission

WC Docket 20-445

To Whom It May Concern:

On behalf of The National Association of Student Financial Aid Administrators (NASFAA) and our 3,000 member institutions, we respectfully submit our comments to the Federal Communications Commission on the provision of assistance from the Emergency Broadband Connectivity Fund and through the Emergency Benefit Program, as established by the Consolidated Appropriations Act, 2021.

NASFAA represents nearly 20,000 financial aid professionals who serve 16 million students each year at colleges and universities in all sectors throughout the country. NASFAA member institutions serve nine out of every ten undergraduates in the U.S.

Under the Emergency Benefit Program, eligible households, including households where at least one member has received a Federal Pell Grant in the current award year, may receive a discount off the cost of broadband service and certain connected devices during an emergency period relating to the COVID-19 pandemic, and participating providers can receive a reimbursement for such discounts. The participating broadband provider will verify the household's eligibility for benefits by one of several methods, depending on the applicant's basis for eligibility. For households seeking to establish eligibility on the basis of receipt of a Federal Pell Grant, the broadband provider will use an eligibility verification process approved by the Commission.

NASFAA is a strong advocate for sharing of information across federal agencies, where appropriate and with privacy and security safeguards, so applicants for various federal programs are not forced to provide the same information repeatedly. These sorts of bureaucratic inefficiencies create real and significant barriers that prevent beneficiaries from receiving the very benefits Congress created for them. Ideally, a federal broadband benefit program predicated on receipt of a Federal Pell Grant would entail a computer matching agreement between the Commission and the Department of Education (ED), whereby the Commission can verify Pell Grant receipt directly with ED. Such computer matching agreements, which ED utilizes with other federal agencies to verify student aid eligibility criteria such as citizenship, significantly improve program integrity and reduce administrative burden for all parties. While a computer matching agreement may be difficult and manual in the near term since the broadband benefit program was established as an emergency program intended to provide benefits during the COVID-19 pandemic, it remains the gold standard on coordinated federal benefit programs,

and we encourage exploration of this option if there is consideration of establishing a permanent broadband benefit program.

In the short term, if the Commission cannot obtain information directly from the U.S. Department of Education, and cannot simply rely on self-certification from students, a verification process must be as simple as possible, so as not to deter qualified applicants from obtaining the benefit.

If needed, we recommend that the Commission develop guidelines for providers, to include:

1. Documentation that is easily accessible by Pell Grant recipients on a self-service basis

Requiring that students collect documentation from their institution adds burden to the process. Forms of documentation that are more readily available to students directly might include copies of the student's:

- Institutional bill or financial account;
- Student Aid Report (the output document of the Free Application for Federal Student Aid, or FAFSA);
- Financial aid offer; or
- Financial aid history from the National Student Loan Data System (NSLDS)

2. Multiple forms of acceptable documentation

Not all students will have access to the same forms of documentation. Multiple forms of acceptable documentation will increase the ability of students to comply with requirements.

3. Acceptance of documentation provided directly by the student rather than the institution

Several of the suggested forms of documentation above are institutional sources and requiring that it be submitted directly by the institution will not strengthen program integrity in a measurable way and will introduce burdensome and complicated consent issues. Many applicants will simply not complete the application and those who do will face a significantly slower process.

4. Use of a Commission-developed template to document Pell Grant receipt

Not all students will have access to one of any given provider's acceptable documents. In such cases, the Commission should make available a standard template that an applicant can provide to their school for completion that would document Pell Grant receipt. To avoid consent issues, the student would collect the completed form from the institution and provide it to the provider.

Because a template involves significantly more burden for both the student and the institution, we would strongly object to a provider policy mandating a form completed by the institution as the only acceptable form of documentation. Instead, we would recommend the use of a template as an option of last resort, for cases when the student cannot obtain another form of acceptable documentation. In these cases, a standard template made available by the Commission will ensure consistency and avoid duplication of work by the many providers.

We appreciate the opportunity to comment on the Emergency Benefit Program. If you have any questions regarding these comments or we can be of further assistance regarding the Pell Grant eligibility qualifier, please contact me or NASFAA Director of Policy Analysis at mccarthyk@nasfaa.org.

Regards,

A handwritten signature in black ink, appearing to read 'Justin Draeger', with a stylized flourish at the end.

Justin Draeger, President & CEO