



To: Federal Communications Commission

From: KIPP DC Public Schools

Date: Monday, April 5, 2021

Subject: WC Docket No. 21-93 - Public Comment

KIPP DC is a public charter school in Washington, D.C. that operates 18 schools serving 7,000 students in grades PreK3 through 12 in Wards 5, 6, 7, and 8 in the District. 99% of our student body identify as Black or African American.

Throughout this school year and during the pandemic we have had to adapt and adjust. Since the pandemic began, our primary mode of instruction has been virtual. However, we were also committed to supporting the needs of all students so since early fall, KIPP DC has been operating an optional, weekly, in-person program called Wednesday Workshop for any child that was interested. Originally, more than 400 families and about 125 staff members opted-in for this in-person experience and now both of those numbers have doubled and we ran this programming through the end of February 2021. And now, since March 2021 we have offered four-day programming at all schools and roughly 1,600 students have opted in to these activities. However, throughout this year our primary instruction model has remained virtual.

Since transitioning to virtual learning, all students received the necessary and appropriate technology to learn at home, including a Chromebook at home for every student and hot spots for families that needed Internet support. We have also provided printed materials, books, and classroom supplies. Our campuses continue to serve as meal distribution sites and we have launched an at-home meal delivery service for families who were anxious to travel to school.

We appreciate that the Wireline Competition Bureau is seeking comment on the provision of support from the Emergency Connectivity Fund consistent with section 7402 of the American Rescue Plan. With that in mind, we wanted to share a few considerations from our experience over the last year:

- **This year, our homes have been our classrooms.** We need to expand home internet so learning continues if schools are closed for in-person instruction or students are quarantined. In addition, we anticipate continuing blended learning efforts at home going forward for homework and out-of-school enrichment.

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- **The homework gap existed pre-pandemic and will persist unless we use our resources today to help close the gap.** Early in the pandemic we surveyed families and found that somewhere between 15-20% lacked quality home internet access. Since the beginning of the pandemic we have distributed ~1,300 (20% of families) hot spots directly to families. In addition, we distributed one Chromebook to every student for their use at home so that they had the same opportunity to learn as any other student.
- **Even as schools reopen, we know many children will continue to learn online.** While we are focused on providing five days of in-person instruction for all students next year, we know that some portion of families may want a virtual option at some point next school year. In a recent survey we found that somewhere between 10-20% of families (depending on the school and school type) think that they may choose to start the year virtually for their student.

These are our experiences and the experience of our students, and with that we encourage you to modernize the E-rate program and allow it to support remote learning. Nationwide, one out of three Black, Latino, and American Indian/Alaska Native households do not have high-speed home internet. And nationwide, 16.9 million children remain logged out from instruction because their families lack the home internet access necessary to support online learning, a phenomenon known as the homework gap. As a country we have an opportunity to change this and we encourage you to do so.

Specifically we would encourage you to:

- Allow funds to be used for locations other than school or library (without additional restrictions)
- Use a modified E-rate process (i.e., don't create a new process)
- Create a two-track application process
  - Fast funding for most applicants by using per entity budget caps
  - Special consideration for high-cost networks and consortia
- Adopt a broad eligible services list
  - Give schools and libraries flexibility to extend wireless networks
  - Support all components that a remote learner might need (laptop, video conference platforms, cybersecurity, Internet access)
  - Rely on budget caps (not narrow definitions) to govern funds
  - Consider using GAP funds to help LEA's create private LTE networks
- Make eligible purchases since June 2019 (since many school-based laptops were repurposed to be sent home at the start of the pandemic)

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- Make all purchases subject to state/local/tribal bidding laws
  - Retroactive funding requests do not require Form 470
  - Streamlined Form 470 process for new purchases
  - All purchases documented with Form 471 application
- Allow for hardware to stay with student after one-year of use (i.e., gift rules)
- Do not prohibit schools from providing more than one supported connection and more than one connected device to each student. Virtual learning has required more from technology and we should not limit the number of connections of devices a student needs

If you have any questions, please do not hesitate to contact Dane Anderson, Chief Operating Officer, at [Dane.Anderson@kipfdc.org](mailto:Dane.Anderson@kipfdc.org) or (202) 487-1093.

Sincerely,

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