

National School Boards Association Comments

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, DC 20554**

In the Matter of)
)
Emergency Connectivity Fund for) WC Docket No. 21-93
Educational Connections and Devices)
to Address the Homework Gap)
During the Pandemic)

**COMMENTS FROM THE NATIONAL SCHOOL BOARDS ASSOCIATION (NSBA)
REGARDING THE EMERGENCY CONNECTIVITY FUND FOR EDUCATIONAL
CONNECTIONS AND DEVICES TO ADDRESS THE HOMEWORK GAP DURING
THE PANDEMIC**

Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

RE: Comments in the Form of a Letter

Dear Acting Chair Rosenworcel, Commissioner Carr, Commissioner Starks, and Commissioner Simington:

The National School Boards Association (NSBA) applauds the recent passage of the American Rescue Plan Act (ARP) and its dedicated funding of \$7.171 billion (Emergency Connectivity Fund) to help millions of students without Internet access during the pandemic. This funding will provide help to many of the students impacted by the digital divide in education, commonly called the homework gap. We urge the Federal Communications Commission (Commission) to expedite the Emergency Connectivity Fund’s distribution in a low-burden manner that best helps the largest number of students while employing transparent and flexible approaches that promote local decision-making by districts and local school boards and protects the program’s overall intent and furthers its success.

NSBA is a not-for-profit organization and federation of 49 state school board associations and the U.S. territory of the Virgin Islands, representing more than 90,000 school board officials, that advocate on behalf of the more than 50 million students who attend a public school. Closing the homework gap is a high priority for NSBA and its members. Since the pandemic began, NSBA has advocated that any direct funding to close the homework gap be distributed through the E-Rate, due to schools’ familiarity with the program. We encourage the Commission to use existing processes when possible. However, NSBA also understands that due to the uniqueness of this one-time appropriation, the Commission needs to explore a variety of methods to ensure the best allocation of funding to connect the highest number of needy students.

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The homework gap has been a major equity issue in education for many years. The COVID-19 pandemic has only exacerbated this existing problem. In August 2019, NSBA, and all its state association federation members, first called on the Commission to “address the digital divide in education.”¹ Lack of access by millions of students to high-speed broadband and adequate devices stands in the way of their success and is a prime concern for school board members in school districts across the nation highlighting a problem that existed long before the pandemic.

During COVID-19, NSBA has expanded its call to the Commission, Congress, and the past and current Administration to address this issue. NSBA joined a January 26, 2021 joint filing by the Schools, Health, & Libraries Broadband (SHLB) Coalition and seven other education groups (Petitioners) in a petition calling for the Commission to issue an expedited declaratory ruling and waivers allowing the use of E-Rate funds for remote learning during the COVID-19 pandemic.² NSBA also aggressively called on Congress and the Administration to appropriate dedicated funding that would run through the E-Rate program to help with this issue during the pandemic. Approval and implementation of the Emergency Connectivity Fund is an important step in helping the students who need assistance the most, but there must be continued focus to address this issue by federal leaders including making a long-term commitment to closing the homework gap.

As NSBA cited in other filings with the Commission, the lack of Internet access is widespread across the nation but hits high poverty and rural students the hardest. The recent report issued by the Alliance for Excellent Education (All4Ed), National Indian Education Association (NIEA), National Urban League (NUL), and UnidosUS found 16.9 million children lack high-speed broadband access at home.³ This serious equity issue must be addressed.

NSBA recently launched the Public School Transformation Now! initiative to focus on how to improve student success and learning through promotion of access, equity, and innovation in public education. Transforming public schools and offering students more personalized learning and other innovative instructional models requires greater resources and tools such as access to technology and high-speed broadband both in school and out. It is imperative that the homework gap be addressed to meet the goals of this important initiative. The homework gap is not just a problem of the pandemic, rather, it is a serious problem that needs to be addressed for the future of education and the well-being of the national economy.

¹ Reply Comments to the Federal Communications Commission, National School Boards Association et al, Accessed April 5, 2021, <https://www.fcc.gov/ecfs/filing/1082769606228>

² Petition for Expedited Declaratory Ruling and Waivers filed by the Schools, Health & Libraries Broadband Coalition, et al., WC Docket No. 13-184 (filed Jan. 26, 2021), <https://www.fcc.gov/ecfs/filing/101260036427898> (SHLB Petition). The Petitioners include the Schools, Health and Libraries Association (SHLB), National School Boards Association (NSBA), American Library Association (ALA), Consortium for School Networking (CoSN), State Education Technology Directors Association (SETDA), State E-rate Coordinators Alliance (SECA), Urban Libraries Council (ULC), Wireless Futures Project Open Technology institute at New America, and the Wisconsin Department of Public Instruction.

³ Future Ready Schools, “Students of Color Caught in the Homework Gap” (July 2020), available at <https://futureready.org/homework-gap/> (Future Ready Schools Report). Accessed April 5, 2021.

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NSBA is intensely focused on providing valuable feedback, based on school board member's insights about their local broadband needs, to the Commission on this crucial issue. We are talking with our members and working closely with other national organizations to identify the best possible methods for allocating the funding to connect the largest number of students and educators. It is vital that the allocation is transparent, flexible, supports local decision-making to the extent possible, keeps the current E-Rate program strong, and meets Congress's intent. NSBA will offer detailed recommendations and observations during the reply comment period based on this focused work to assist the Commission as it makes these important decisions regarding the Emergency Connectivity Fund. Closing the homework gap is a high priority equity issue for NSBA, our state association members, and school board members across the nation.

We thank the Commission for the opportunity to comment on this important issue. We look forward to offering detailed reply comments in the coming weeks. NSBA commends the Commission leadership on this important issue and looks forward to working with you to close the homework gap.

Sincerely,

A handwritten signature in blue ink that reads "Anna M. Chavez". The signature is written in a cursive, flowing style.

Anna Maria Chávez, Esq.
Executive Director & CEO
National School Boards Association