Supporting Equitable Access to Education by Closing the Homework Gap

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Summary

The next administration should maximize the use of all available policy tools to close the homework gap and keep it closed. First, the Federal Communications Commission (FCC) should update the existing E-rate program to allow schools to ensure home access to broadband for every student and teacher (Pre-K to Grade 12). Second, the FCC, in coordination with the Department of Education, should launch a one-to-one device program for students and teachers (Pre-K to Grade 12). Third, the FCC should incentivize the deployment of “future-proof” networks that are capable of at least 100/100 mbps to meet the needs of distance learning. Fourth and finally, the FCC should provide schools and states clear guidance on the key data needed to assess their homework gap and include this data in a public facing dashboard for broader stakeholder analysis.

Challenge and Opportunity

The homework gap—which refers to the divide between students who have home access to the technology tools necessary for education versus those without—has existed for decades.

At the start of the pandemic, 55 million students were sent home due to school closures and school districts initiated large-scale distance learning efforts. However, an estimated 16 million students and 400,000 teachers lacked access to an adequate home broadband connection or device needed to effectively engage in distance learning.¹ Recent reports find that the homework gap disproportionately impacts lower-income and minority students.² For these students in the homework gap, some schools—striving to continue any form of education—began to offer paper packets. Others opted to close early for the year, understanding that if they proceeded with a distance learning program without addressing the homework gap, they would further exacerbate existing inequities in education. The pandemic has forced our nation to see the consequences of the homework gap in real time. Educational and economic experts connect the disruption in access to education to learning loss, which negatively impacts children’s long-term economic well-being and the US economy as a whole.³ Of course, it is worth underlining the fact that a pandemic is not the only reason schools have been closed in recent years as the effects of climate change, including extreme heat, wildfires, flooding, hurricanes, and tornadoes, have all caused extended disruptions to in-school instruction, and will continue to in the future. It is incumbent on policymakers to support school efforts to nimbly shift to distance learning when needed.

While policymakers have made progress on this issue by focusing on connecting and resourcing anchor institutions, such as schools, libraries and other community-based organizations, efforts

to date have largely focused on providing students in the homework gap with an alternative public resource outside of the home. While some of these outside supports have their own benefits (e.g. trained staff, access to printers) they force students in need of access to remain outside of the home after school hours. For a family with limited time and resources, shuttling to and from various public computing centers (e.g. libraries, community-based organizations) cuts into work hours and requires additional funds for transportation. Even when these public resources are known to be available, teachers avoid assigning homework that may require heavy use of the internet because of the lack of home access to broadband for students.\(^4\) With years of institutional connectivity investments in place, anchor institutions are well positioned to help close the homework gap at home for teachers and students alike, once and for all.

In Congress, several bills (See HEROES Act\(^5\) and Emergency Educational Connections Act\(^6\)) have been introduced to fund the homework gap and to be administered through the FCC’s E-rate program, indicating that significant support exists to bolster the FCC’s current commitment to ensure connectivity for schools also extends to students with both funding and necessary updates to relevant statutes.

Prioritizing the resilient delivery of education and supporting equitable access to education by closing the homework gap helps to shelter our nation’s students in times of crisis and helps to ensure that all students have an opportunity to thrive when times are calm.

**Plan of Action**

**E-rate**

The FCC should update the existing E-rate program to clarify that the program will support schools to ensure home access to broadband for every student and teacher (Pre-K to Grade 12). The E-rate program is well known to schools, libraries and community-based organizations who are already working to address the homework gap. Since the start of the pandemic, states and schools have quickly built programs to try to cover the homework gap for as many students as possible. Without reliable funding these initiatives are at risk of ending, pushing students back into the homework gap. Ensuring reliable funding depends both on Congress doing its part to legislate and commit necessary funds,\(^7\) as well as the FCC to modernize the E-rate program to better serve the educational needs of students and robustly support home broadband access.

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\(^7\) The cost to close the homework gap for students and teachers in the first year is estimated to be 12 billion dollars. After the first year of investment there may be lower costs in following years since some device may not need to be replace every year. Chandra, S. et al., (2020). Closing the K–12 Digital Divide in the Age of Distance Learning. San Francisco, CA. Common Sense Media. Boston, Massachusetts, Boston Consulting Group.
Because the FCC has E-Rate as an existing program that schools already work with on connectivity, expanding E-rate to also coordinate funding for student devices is efficient, school-friendly, and common-sense policy. Separating the device component of the homework gap to a new program would slow down delivery of support and require schools to navigate additional and a potentially new administrative process. The FCC should collaborate with Department of Education (ED) and Bureau of Indian Education (BIE) to ensure that both the device and connectivity components of a support program meet the needs of students and educators.

Connectivity
The FCC should
- Allow schools to use E-rate funded networks to support innovative programs to deliver home broadband access to students.8
- Allow E-rate funds to pay for home broadband subscriptions for students.
- Allow for consortia and bulk purchasing.
- Extend rules around pricing transparency to funds used for home broadband subscription for students and publish pricing information on the FCC website.

Devices
The FCC, in coordination with ED and BIE, should launch a one-to-one device program to
- Ensure access to developmentally appropriate devices for students and teachers (Pre-K to Grade 12), as well as supplying the kind of equipment necessary for high quality STEM learning opportunities and equitable STEM education broadly.
- Develop a joint taskforce with Department of Commerce, ED, and BIE to address supply chain constraints for devices, ensure that the educational market is prioritized, require transparency in pricing and publish pricing information on the FCC website.

Infrastructure Upgrades and Deployment
The FCC should incentivize deployment of “future-proof” networks—capable of at least 100/100 mbps—that can meet the needs of distance learning. Distance learning efforts since March have revealed that even if the cost of a monthly broadband subscription could be addressed, many students still lack access to a broadband service capable of delivering a synchronous distance learning program (at least 200/10 mbps). The FCC should
- Ensure that supported networks are able to deliver synchronous distance learning programs where the FCC provides funding for broadband infrastructure deployment.
- Prioritize infrastructure upgrades and deployment in areas that have broadband service of 25/25 mbps or less.

Review rules, regulations and guidance from the FCC to encourage community broadband projects and other forms of public/private partnerships to apply for infrastructure funding.

Encourage open access of funded infrastructure.

Supporting School-level Assessments

To ensure these programs continue to serve schools and students effectively, the FCC should provide schools and states clear guidance on the key data needed to assess the current state of the “Homework Gap” and include this data in a public facing dashboard for broader stakeholder analysis. Schools across the country have already begun to assess the homework gap in their own districts down to the address level and plan to continue these assessments periodically. The Administration should also encourage these efforts by launching a national homework gap mapping project to assess gaps. The FCC should encourage data collection on

- Broadband service availability
- Broadband service speeds
- Quality of broadband service
- Service providers available
- Needs for IT support (for both students/caregivers and teachers)
- Needs for digital literacy support (for both students/caregivers and teachers)
- Location information (while remaining FERPA compliant)
- Demographic information
- Language(s) primarily spoken

Conclusion

The FCC should modernize and expand its approach to closing the homework gap. Students, parents, and teachers need the federal government to step up and commit to a historic effort to ensure poor Internet access is no longer a systemic barrier in our society. Programs must be expanded or developed to ensure that all students and teachers have continuing support for home access to broadband and devices that meet the current and future demands of distance learning. Federal funds used for the expansion of broadband infrastructure must prioritize communities that lack the ability to adequately support distance learning (25/25 mbps or less) and require that any new deployment not only meet today’s demand for distance learning but also be able to evolve to meet future educational requirements. The FCC has an opportunity to work in partnership with schools, cities, and states to develop a recurring, granular, robust, assessment of the homework gap that would provide current, actionable data to support and encourage efforts to keep the gap closed.
About the Author

Amina Fazlullah is the Equity Policy Counsel for Common Sense where she works on a range of issues on behalf of kids and families, including platform accountability, expanding access to technology, digital well-being, and privacy. Amina was a Technology Policy Fellow at Mozilla, where she worked to promote broadband connectivity in underserved communities around the world. Amina has also worked with the Benton Foundation, U.S. Public Interest Research Group, for the Honorable Chief Judge James M. Rosenbaum of the U.S. District Court of Minnesota, FCC’s Office of Policy and Planning and the EEOC’s Office of Legal Counsel.

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