CoSN Education Technology Policy Recommendations

The absence of universal student access to the high capacity broadband and sufficiently powerful devices required for learning is one of the biggest equity gaps in education. The nation’s failure to enable all students to take advantage of the opportunities provided by digital learning has been problematic for many years, but the pandemic has magnified the Homework Gap’s consequences. With most schools operating virtually, or using hybrid in-classroom and virtual models, students that lack access to broadband, technology, or both are being left behind. The Department of Education’s research and other surveys show that the digital learning access gap is most pronounced for rural, low income, and minority students, many of whom already face major obstacles to preparing for life after graduation.

Federal Leaders Must Provide Emergency Supplemental Funding for E-rate to Connect all Students and Teachers to Broadband from Home

Thanks to the E-rate program and strong school district and state leadership, the country has successfully achieved at least basic internet access at almost every school. Unfortunately, home broadband connectivity rates for rural and low income students and teachers are inadequate. With the pandemic requiring tens-of-millions of students to attend school from home during the 2019-20 school year the nation’s failure to connect all households to broadband has created a massive learning gap. The problem is pronounced for rural, low income, and minority students. For example, a 2019 Pew Research Center survey showed that approximately two thirds of rural adults (63%) have a home broadband connection compared to three fourths of urban (75%) and suburban (79%) adults. The Pew survey also showed that rural adults “remain less likely than suburban adults to own “traditional and tablet computers”. The Future Ready Schools initiative reports that “36 percent of Americans living in rural areas of the United States lack high-speed home internet and 14 percent don’t have a computer. The National Center for Education Statistics reported in 2017 that for 5- to 17-year-old students living in households in remote rural areas, the percentage without internet access at home was particularly high; 41 percent of Black students and 35 percent of students living in poverty had either no internet access or only had dial-up access at home.

2 Ibid.
Addressing this problem must be a 2021 priority. Federal leaders should expand the E-rate program’s focus to address home access for students and teachers and provide at least $6 billion in emergency funding to the program for that purpose. This amount is based on a recent study by Common Sense Media and Boston Consulting Group which estimates that between $6 billion and $11 billion in additional emergency funding is required to connect all students and begin to close the digital divide that has been exposed by the pandemic. This assistance is needed to ensure that schools can quickly provide all unconnected learners with the hardware, software, and protected broadband connections needed to deliver safe and secure online learning when school resumes. In an October 2020 report, Common Sense Media, Education Superhighway and Boston Consulting recently published a useful guide that offers insights about the types of devices required for online learning and that, thus, should be supported by this emergency investment. E-rate has a successful record and is well positioned, with additional funding, to help meet this national need. In addition, federal leaders should complement E-rate with broadband infrastructure investments to ensure home broadband, as well as help anchor institutions and companies connect isolated rural residents that are hardest serve. The FCC should also use its authority to the greatest extent possible to promote and support local innovation and creative connectivity solutions to close digital equity gaps at school and home.

Federal Leaders Must Prioritize K-12 Cybersecurity to Protect Students and Staff from Serious Financial, Privacy, and other Harms

Cybersecurity is a significant and growing challenge for school districts. For the third consecutive year, CoSN’s members cited cybersecurity as their top priority when they responded to the organization’s annual leadership survey. The survey adds to rising concerns about the seriousness and scope of the cyber threats facing education networks, including costly ransomware incidents and potential breaches of confidential student and employee data. Recent attacks have resulted in school district closures or delays in opening from Alabama to Nevada, Florida to New York. In Louisiana, the Governor declared a state of emergency after a virus disabled school districts.

Ensuring that every school district has the technical and personnel capacity to repel cyberattacks is important to public education. Ransomware attacks can cause significant lost learning time and the loss of finite education funding that should be focused on students. Other cyberattacks can compromise personally identifiable student and employee data causing economic and other damage to affected individuals and eroding trust between schools and families that is vital to effective data use for learning, administration, policy, and research.

Unfortunately, the E-rate program does not – as a matter of Federal Communications Commission policy - cover the most essential cybersecurity costs. Federal leaders must swiftly expand the program’s eligible services list to included advanced network security and provide federal assistance to ensure that every school district network and district users are protected from cyberattacks. In addition to ensuring that E-rate funds can support cybersecurity, Congress should also:

- direct the Cybersecurity and Infrastructure Security Agency Director to establish a Cybersecurity Clearinghouse to disseminate information, best practices, and grant opportunities to improve cybersecurity.
- establish a Cybersecurity Registry Establishes a Cybersecurity Registry within CISA to track incidents of cyberattacks on elementary and secondary school; and
- establish a K-12 Cybersecurity Human Capacity Grant Program.

Federal Leaders Must Reform the Revenue Structure for the Universal Service Fund

The Universal Service Fund, encompassing the vitally important E-rate, High Cost, Rural Health Care, and Lifeline connectivity programs, is a vital tool in the federal effort to promote access to broadband. The Universal Service Administrative Company, which oversees the four programs’ operations, has published data that shows the breadth of the USF’s impact on connectivity in the United States. The USF program has helped:

- 128,147 Schools & Libraries,
- 9,050 Rural Health Care Clinics,
- People Served 8.1 million Lifeline-Eligible Households, and
- 1.2 million High Cost-Area Households

Unlike most federal initiatives, the USF is not funded through general U.S. Treasury receipts. Instead, USF operations and programs are funded by payments made by telecommunications providers that are then reinvested in the providers’ networks. Telecommunications companies pay a percentage of their interstate end-user revenues (the “contribution factor”) to the USF. Contributing companies include wireline phone companies, wireless phone companies, paging service companies and some Voice over Internet Protocol providers. The system’s dated reliance on interstate telecommunications revenues has caused the contribution factor, which is adjusted every quarter based on program demand, to increase to 25%. This funding model, reliant on a declining telecommunications sales concept, has placed limitations on the system’s ability to address the nation’s broadband gaps, including the need to connect students to broadband at home.

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6 Universal Service Administrative Company, Universal Service Fund Data, Available at usac.org.
Federal leaders should make reforming the USF’s revenue model a top priority for 2021. Although the FCC should play a key role in the process, updating this component of the universal service system should be led by Congress and the Administration. The far-reaching impact of this policy change – and its direct connection to establishing and achieving a universal national broadband connectivity goal – should be determined by the nation’s elected officials. With that vision as our guide, we strongly encourage the White House to issue goals and guiding principles (e.g., establishing a long term basis of USF support; achieving the nation’s broadband goals; equitable contributions and distributions) in 2021, along with a call for Congress to determine which services and providers should be required to contribute to universal service consistent with the White House principles.

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