

February 26, 2021

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To Whom It May Concern:

Today's students in college face imminent challenges to continuing their education and are increasingly grappling with basic needs insecurity as a result of the ongoing COVID-19 pandemic. We are writing to ask that the Office of Management and Budget (OMB), under the directive of President Biden's recent [Executive Order on Economic Relief Related to the COVID-19 Pandemic](#), ensure that the millions of postsecondary students who have been negatively impacted by the pandemic receive the aid that Congress approved in the *Consolidated Appropriations Act of 2021*. OMB can do so by promoting efforts to improve coordination across federal agencies and ensure the expertise and competencies of agencies is not wasted by having agencies work at cross-purposes, as is the purpose of Executive Order 14002.

On January 22, 2021, President Biden signed an [Executive Order on Economic Relief Related to the COVID-19 Pandemic](#). The Order specifically directs federal agencies to take actions that will "facilitate better use of data and other means to improve access to, reduce unnecessary barriers to, and improve coordination among programs" in order to ensure that federal COVID-19 relief reaches people without delay. In considering how this order could be implemented to support today's students, we have identified several cases where agency coordination will be crucial to ensure that students receive the relief that they are entitled to.

We see opportunities for specific interagency coordination in the following areas:

- ***Federal Communications Commission (FCC) and the U.S. Department of Education (ED) for the Emergency Broadband Benefit for Pell students.*** Due to the pandemic, almost all of today's students attending postsecondary education are studying at least partially online. Access to broadband and technology is even more critical now than ever, and we know that too many of today's students are just making do. Lack of technology access has the potential to hit underserved students and students of color the hardest. The recent Emergency Broadband Benefit Program established by the FCC (which includes students who receive a Pell Grant as an eligible group), brings an opportunity for these two agencies to coordinate and collaborate to ensure that the verification process under this program allows all eligible students to quickly access the benefit. In this instance, it would be crucial that FCC and ED coordinate through the Commission establishing a computer matching agreement that provides a streamlined verification process that maximizes eligibility while ensuring the financial integrity of the program.
- ***Federal Agencies' Coordination on new Supplemental Nutrition Assistance Program (SNAP) availability for college students.*** A key principle of the Supplemental

Nutrition Assistance Program (SNAP) is ensuring that every family in every community has access to healthy and affordable food. Food insecurity is a growing and serious problem for today's students enrolled in postsecondary education—estimates show that about one-third of college students experience some form of food insecurity. Further, while 18 percent of college students qualify for SNAP benefits, only three percent of students actually receive such benefits. The *Consolidated Appropriations Act of 2021* now means that students who have zero Expected Family Contribution on the Free Application for Federal Student Aid (FAFSA) or who receive Federal Work Study can now qualify for SNAP benefits. The Department of Agriculture and ED should work together to swiftly enroll eligible students in SNAP to break the cycle of food insecurity among college students.

- ***Coordination between U.S. Department of Health and Human Services (HHS) and the U.S Department of Education (ED) on child care for student parents.*** These two agencies manage two key child care programs that enable student parents—who make up 22 percent of college students—to focus more time on their postsecondary education and work toward degree completion. The Child Care Access Means Parents in School Program (CCAMPIS) managed by ED allows institutions of higher education to establish and expand on-campus child care services, and the Child Care & Development Block Grant (CCDBG) managed by HHS provides grants to bolster child care for children from low-income families whose parents work, train for work, attend school, or whose children receive or need protective services. Both programs have proven to be critical in providing access to childcare for parents who otherwise wouldn't be able to afford it. ED and HHS should examine how CCAMPIS programs and the administration of CCDBG funding by states can be better utilized to benefit student parents, especially while on-campus child care offerings may be closed or dramatically scaled back due to the COVID-19 pandemic.

Improving efficiency, effectiveness, and coordination can help to overcome potential dysfunctions in policy implementation and ensure that all students receive aid and access to means-tested benefits in a timely manner. Greater coordination can reduce costs for both the government and regulated entities not only by avoiding duplication of functions but also by increasing opportunities for agencies exercising related responsibilities to manage and reconcile differences in approach. Coordination that takes the form of interagency consultation can improve the overall quality of decision-making and will allow agencies to work with the urgency needed to respond to the ongoing crisis.

The federal government can begin addressing the challenges of fragmentation and overlap through improved coordination. OMB is well positioned to promote coordination among the agencies listed above to improve services and programs that benefit today's students enrolled in postsecondary education. Thank you for your attention and we look forward to assisting in any way possible.

Sincerely,

Higher Learning Advocates

Accrediting Commission for Community and Junior Colleges

AMC Consulting
America Forward
American Association of University Women (AAUW)
American Council on Education
Ascend at the Aspen Institute
Association of Governing Boards of Universities and Colleges
Breakthrough Central Texas
CivicLab
College Bound - St. Louis
College Forward
Educate Maine
EDUCAUSE
Foundation for Tacoma Students
Georgetown University Center on Education and the Workforce
LeadMN - College Students Connecting for Change
Maine Development Foundation (MDF)
Middle States Commission on Higher Education
National Association of Student Financial Aid Administrators
New America Higher Education Program
Results for America
St. Louis Graduates
State Higher Education Executive Officers Association
Student Veterans of America
Students United
The Education Trust
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