

# Low Income Program Certification and Verification

- **Consumer Certification**
  - Consumers certify eligibility
- **Company Certification**
  - Companies certify they are following state and FCC rules
- **Verification**
  - Periodic checks to see whether existing Lifeline customers remain eligible



# Low Income Program Certification

- Occurs at the time an individual applies to enroll in Lifeline

## Program-based eligibility

- **States that mandate support:** consumer must follow that state's certification procedures
- **Federal default states:** consumer must self-certify, under penalty of perjury, he or she is enrolled in qualifying assistance program

## Income-based eligibility

- **All states:** consumers must present documentation of income prior to enrolling
- Consumers qualifying under income-based criteria must self-certify, under penalty of perjury:
  - Their eligibility to participate
  - Number of individuals in their household

## **Federal default states**

- If consumer presents documentation of income that does not cover a full year, such as current pay stubs, the consumer must present three consecutive months worth of the same types of documentation within that calendar year.

## States that mandate support

States have the flexibility to:

- Develop certification procedures to document income, in addition to self-certification, which is mandatory
- Determine whether a state agency or individual carriers will serve as the certifying entity

Carriers **must**:

- Be able to document they are complying with state regulations and recordkeeping requirements

## Federal default states

Officer of the company enrolling the Lifeline customer must certify, under penalty of perjury that:

- Company has procedures in place to review income documentation
- To the best of his or her knowledge, company was presented with documentation that consumer's household is at or below 135% of FPG

These certifications must be submitted to USAC by August 31 of each year.



## **States that mandate their own Lifeline program**

An officer of the company must certify that:

- The company is in compliance with state Lifeline and Link Up income certification procedures and that, to the best of his or her knowledge, documentation of income was provided.
- The company is in compliance with its state's certification and verification procedures, including any deadlines set by the state.

These certifications must be submitted to USAC by August 31 of each year.

- ETCs that sell Lifeline connections to non-ETC resellers must obtain certifications from the non-ETC reseller that it is complying with the FCC's Lifeline and Link Up requirements.

See *In the Matter of Lifeline and Link Up*, para. 40 (2004)



# Low Income Program

## **Verification**

- Verification occurs on a periodic basis after consumer certification
  - **States that mandate support:** consumer must follow that state's verification procedures.
  - **Federal default states:** verification requirement began in 2005
- All states must establish procedures to verify consumers' continued eligibility under both program-based and income-based criteria

## Federal default states

- Carriers must verify annually the continued eligibility of a statistically valid sample of their Lifeline subscribers

Verification is done by:

- Verifying directly with a state agency that a particular consumer continues to participate in a qualifying program or income level
- Surveying the consumer directly

## Federal default states

- “Statistically valid sample” is based on the number of Lifeline customers and the number found to be ineligible during the previous year’s verification process.
- Carriers must submit verification results to USAC by August 31 of each year.

## Federal default states

Consumers asked by carriers to verify eligibility must:

- Present qualifying public assistance card and self-certify, under penalty of perjury, that they continue to participate in the Lifeline-qualifying public assistance program (if program-based)
- Present current documentation of income and self-certify, under penalty of perjury, that documentation accurately reflects income and number of individuals in household (if income-based)

## **Mandated support states**

States have flexibility to:

- Design and implement their own verification procedures
- Determine which entity (e.g., state agency, carrier, third-party consultant) will be responsible for verification



## **Mandated support states**

- Carriers must be able to document they are complying with state regulations and verification requirements
- Some states that mandate support require ETCs to submit their verification results to USAC

FCC Public Notice revealed no major changes to the process in 2010.

- Confirmed time period for verification review
- Clarified that a carrier must follow federal default procedures when a state does not impose or enforce certification and verification requirements on the carrier (February 2010 Declaratory Ruling)

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