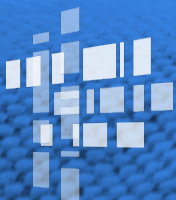


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LIFELINE NATIONAL VERIFIER PLAN

JANUARY 2020



Universal Service
Administrative Co.

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In 2016, the FCC charged USAC to develop and implement the National Verifier to determine Lifeline eligibility

In March 2016, the Federal Communications Commission (FCC) adopted the 2016 Lifeline Order, further updating the Lifeline program to, among other things, streamline eligibility verification for enrollment and recertification.

The 2016 Lifeline Order tasked USAC with the creation of the National Verifier to standardize eligibility verification across all states and territories and to perform the following functions:

- Create the Lifeline Eligibility Database (LED), connected to state and federal data sources,¹ to determine eligibility for both initial enrollment and annual recertification;
- Allow service providers and consumers to check eligibility or enrollment status; and
- Calculate payments to service providers based on data available through the National Verifier.

¹Data sources of qualifying eligibility programs (e.g., Medicaid)

In the 2016 Lifeline Order, the FCC identified three main goals for the National Verifier

1

Stronger Program Integrity



- Independent eligibility verification, with more automatic checks, conducted directly by USAC to reduce waste, fraud, and abuse
- Single eligibility system to audit and report on potential fraud metrics
- Streamlined, consistent processes to distinguish mistakes from waste, fraud, and abuse

2

Enhanced Customer Experience



- Streamlined access to eligibility information for service providers (SPs)
- States relieved of maintaining computer matching agreements and interfaces with multiple SPs
- More automatic checks of data sources to determine eligibility
- Central source of program information and support for consumers

3

Cost Effectiveness



- Service providers relieved of eligibility verification burden
- Lower cost to aggregated system due to more streamlined processes:
 - More automated verification to reduce costly manual reviews; and
 - More automated recertification to reduce costly outreach

USAC designed the National Verifier to meet these objectives. Stakeholder feedback informs the National Verifier implementation and USAC has continuously integrated stakeholder input throughout the multi-year rollout. A list of recent and upcoming improvements can be found on slide 12.

We have successfully achieved the National Verifier goals

In 2019, USAC accomplished a 3-year long endeavor to meet the FCC's key objectives to protect against waste, fraud, and abuse; lower costs to the Universal Service Fund (Fund) and ETCs through administrative efficiencies; and better serve eligible beneficiaries by facilitating choice and improving the enrollment experience. As a result, USAC and the FCC have:

- Delivered on the 2016 Lifeline Order's expectation of launching the National Verifier (NV) with standardized eligibility verification in all states and territories
 - All 55 states and territories and the District of Columbia (DC) launched; 15 state database connections and 2 federal connections established;
 - Lifeline applicants in Oregon and Texas also benefit from automated database connections through the NV's partnership with the NLAD opt-out states to leverage their existing eligibility verification processes
 - Created an estimated \$7.6M in savings in potential manual review costs by having automated connections to state/federal eligibility databases
- Achieved 67% overall automated eligibility pass rate by adding the CMS Medicaid connection
- Accepted 670,000 applications, nearly half of all applications, directly from consumers through user-friendly consumer portal
- Received more than 1.4M applications since the initial launch of the NV
- Fulfilled carrier requests for an integrated application experience through new Eligibility Check API
 - 19 ETCs have ability to access the API
 - Over 280,000 applications received since launch in early December 2019

Overview of the National Verifier Plan

PURPOSE

This document describes the systems and processes of the National Verifier (NV), provides a the status of the project, and details the enhancements we are pursuing to improve the system.

BACKGROUND

This is the sixth update of the National Verifier Plan (the NV Plan) which was created in response to the 2016 Lifeline Order adopted by the FCC in March 2016.

- Since the initial release of the NV Plan in January 2017, USAC has updated this document every six months, as required by the 2016 Lifeline Order.
- The Wireline Competition Bureau reviewed and provided input on the initial release and each subsequent update.

In addition to the NV Plan, interested parties can reference the [NV section of the USAC website](#) for updates on the NV implementation. Stakeholders can submit comments via email at LifelineProgram@usac.org

USAC communicates detailed content, geared toward specific stakeholder groups, regularly through the [NV website](#), [newsletters](#), and [webinars](#).

National Verifier Launches

On June 18, 2018, USAC and the FCC deployed the NV system, kicking off the initial soft launch in six states. To date, the NV has launched in all 55 states/territories and DC across nine separate launches.

46 states/territories and DC have fully launched and 9 states/territories are in the soft launch phase.



*Does not include Puerto Rico, which will fully launch at a later time

Status of the National Verifier

Consistent with the expectation set by the 2016 Lifeline Order, USAC successfully launched the National Verifier in all states and territories by the end of 2019.

States and territories in the first seven launches, with the exception of Puerto Rico, are in the full launch phase, meaning carriers are required to use the NV system. In addition, consumers have access to use the system through the Consumer Portal in these states.

Where the NV is still in the soft launch phase (launches 8 and 9 and in Puerto Rico), NV system use is optional for carriers in those states and territories and consumers do not have access to the system yet. USAC and the FCC will provide advance notice of the full launch dates for these states and territories.

Status of the National Verifier in NLAD Opt-Out States

California, Oregon, and Texas have managed their own Lifeline eligibility verification and duplicate checking processes for many years. The FCC has determined that it is appropriate to continue relying on those existing functions, but with the addition of a greater partnership between the states, USAC, and the FCC to strengthen program integrity.

The National Verifier will operate in these three states by using state eligibility data to validate service providers' claims for federal Lifeline support. Carriers will continue to file and certify their own claims in the Lifeline Claims System (LCS). USAC may reject a claim if it cannot be substantiated by state data, and the carrier will have to refile.

In the limited instances where a state does not verify the eligibility of subscribers, and service providers have been performing such processes, the National Verifier will conduct eligibility verification as it has in other states.* During the soft launch period, carriers may opt to continue using their legacy processes for such eligibility determinations, until such time that a hard launch is announced.

In partnership with the states, USAC and the FCC will also perform reviews of state eligibility information and documentation to ensure that state eligibility determinations are made in accordance with the Commission's rules.

Note: National Verifier and NLAD process information contained in this document applies to all states and territories except California, Oregon, and Texas as they follow the unique processes detailed above.

*Broadband-only consumers in California, and consumers living on Tribal lands in Oregon

National Verifier Database Connections

The National Verifier system connects with state and federal data sources to automatically validate the eligibility of Lifeline applicants.

Currently, the National Verifier has automated connections to 15 state databases. Oregon and Texas, which are NLAD opt-out states, also have access to state eligibility databases (see slide 8 for more detail on the NLAD opt-out states).

The National Verifier has established automated connections to two federal databases. Any applications that do not pass state or federal automated database checks are reviewed manually.

Though a number of states have launched without a connection to a state database, the costs and risks associated with manual review have been mitigated by the establishment of federal database connections, which have nationwide coverage.

USAC has set up a database connection with the Centers for Medicare & Medicaid Services (CMS), providing eligibility confirmations for consumers receiving Medicaid, and with the United States Department of Housing and Urban Development (HUD), providing eligibility confirmations for consumers receiving Federal Public Housing Assistance. The CMS connection enables automatic verification of program eligibility for nearly 60% of the Lifeline population.

Even though all states have launched in the National Verifier, USAC and the FCC continue to pursue automated connections with states where we do not yet have connections. See the Eligibility Data Sources section for more information.

CMS Connection

The CMS connection for nationwide automated Medicaid eligibility data, implemented in September 2019, has greatly improved automated eligibility pass rates, streamlining the application process by reducing the need to collect documentation from applicants.

- Prior to the CMS connection, states and territories **without** connections to state databases were experiencing an average of a 6% automated pass rate through the connection to HUD.
 - With the launch of CMS, we are currently seeing an automated pass rate of nearly 60%.
- Prior to the CMS connection, states and territories **with** connections to state databases and HUD were experiencing an average of a 71% automated pass rate.
 - With the launch of CMS, we are currently seeing similar average pass rates, however some states, including Colorado, Michigan, and New Mexico, have pass rates of 80% or higher

Performance of the National Verifier

On a daily basis, USAC tracks the performance of the NV and the related operational processes, including those performed by the Lifeline Support Center, in order to identify inefficiencies and areas for improvement.

USAC utilizes performance metrics to measure and improve processes to ensure a consistent and reliable experience for current and prospective Lifeline consumers.

We track response metrics to ensure consumers are being answered in a timely manner. The average speed to answer a phone call at the Lifeline Support Center from September through December 2019 was 38 seconds and the average time to perform a manual review was under 6 minutes.

We are also focused on ensuring the application process in the National Verifier system moves along in a timely manner. To track this goal, we look at database response time as well as the length of time to complete an application. The average automated database response time in 2019 was 1.3 seconds and, in December 2019, 80% of applications that did not require a manual review were completed in six minutes or less.

Continuous Improvement of the National Verifier

USAC and the FCC continuously gather feedback from stakeholders to prioritize enhancements. One of the most significant enhancements in 2019 was the Eligibility Check application programming interface (API).

The API was released to production in December 2019 in response to carriers' requests for more automated tools with which to interact with the National Verifier. The API allows authorized carrier systems to communicate directly with the National Verifier to validate consumer eligibility and check the status of applications. With the API, carriers can integrate the National Verifier processes with their existing business processes to help provide consumers a more seamless experience when applying for Lifeline and signing up for service with the carrier.

In 2020, USAC and the FCC will be further improving NV systems and processes in response to the 2019 Lifeline Order, which was released by the FCC on November 14, 2019. Here are a few of the key items from the Order:

- Prohibits carriers from paying commission on Lifeline enrollments to their agents/employees
- Requires eligibility documentation to be collected in certain instances during annual recertification
- Codifies existing USAC processes to prevent fraudulent enrollment of deceased subscribers and ensure carriers cannot claim more subscribers than are recorded in NLAD.
- Codifies rules regarding the creation and use of the Representative Accountability Database (RAD). See the next slide for more details.

Status of the Representative Accountability Database (RAD)

In its 2017 “Safeguards Letter” and then in the 2019 Lifeline Order, the FCC directed USAC to create a system with the ability to register service provider representatives and lock their accounts due to reasons such as suspicious activity and prolonged periods of inactivity. If a representative is locked out, they will not have access to the National Verifier or NLAD.

In response to this request, USAC developed and launched the first phase of RAD on June 25, 2019, allowing representatives to register and obtain a unique ID. The registration process involves verification of the representative’s identity. On December 4, 2019, service providers were given the ability to link the unique ID to existing accounts.

Currently, the RAD functionality is optional for service provider representatives, as the RAD requirements in the 2019 Lifeline Order will not be effective until March 26, 2020.








On that date, all representatives will be required to provide their representative ID with all enrollment transactions, benefit transfers, subscriber information updates, recertification transactions, and de-enrollment transactions. USAC will monitor representative activity and lock representative accounts as necessary. Representatives also must undergo an annual reauthorization process.

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There are a variety of different criteria by which applicants can demonstrate eligibility for Lifeline

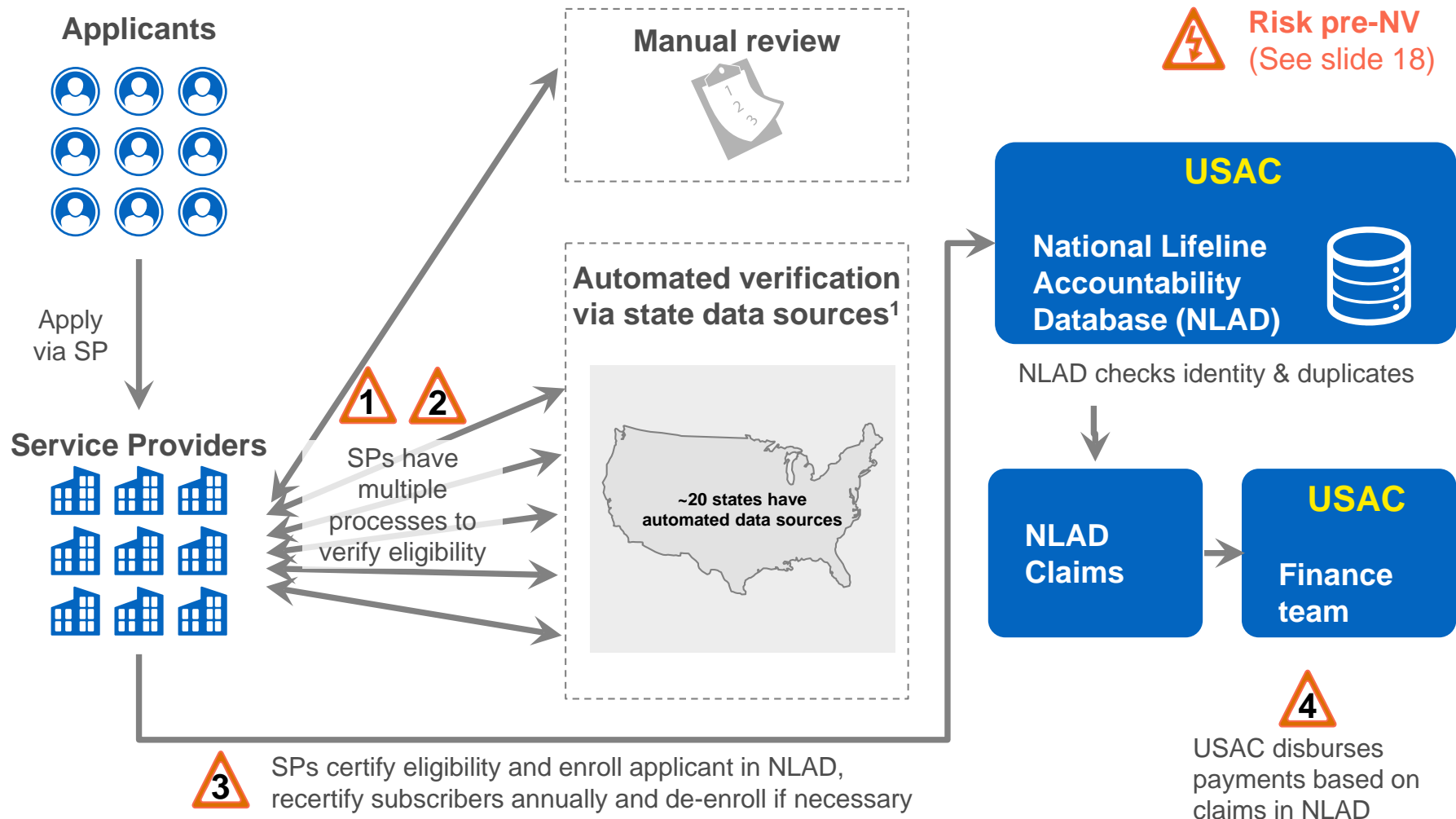
		Current % of Lifeline applicants qualifying through criterion ¹	Comments
Medicaid		29%	<ul style="list-style-type: none"> Qualify through enrollment in Medicaid
SNAP		33%	<ul style="list-style-type: none"> Qualify through enrollment in SNAP
SSI		3%	<ul style="list-style-type: none"> Qualify by receiving SSI payments
Federal Public Housing Assistance		1%	<ul style="list-style-type: none"> Qualify by receiving federal public housing benefits
Income		8%	<ul style="list-style-type: none"> Qualify if income is at or below 135% of the federal poverty line
Tribal ²		0.1%	<ul style="list-style-type: none"> Qualify by receiving certain Tribally-focused assistance programs³
VA		0.4%	<ul style="list-style-type: none"> Qualify by receiving the Veterans Pension / Survivor Benefits

1. Percentages as of December 2019. Numbers do not add to 100% due to rounding and the 2016 Lifeline Order's removal of certain qualifying criteria for Lifeline eligibility determination.

2. Must live on Tribal land to qualify through Tribal programs

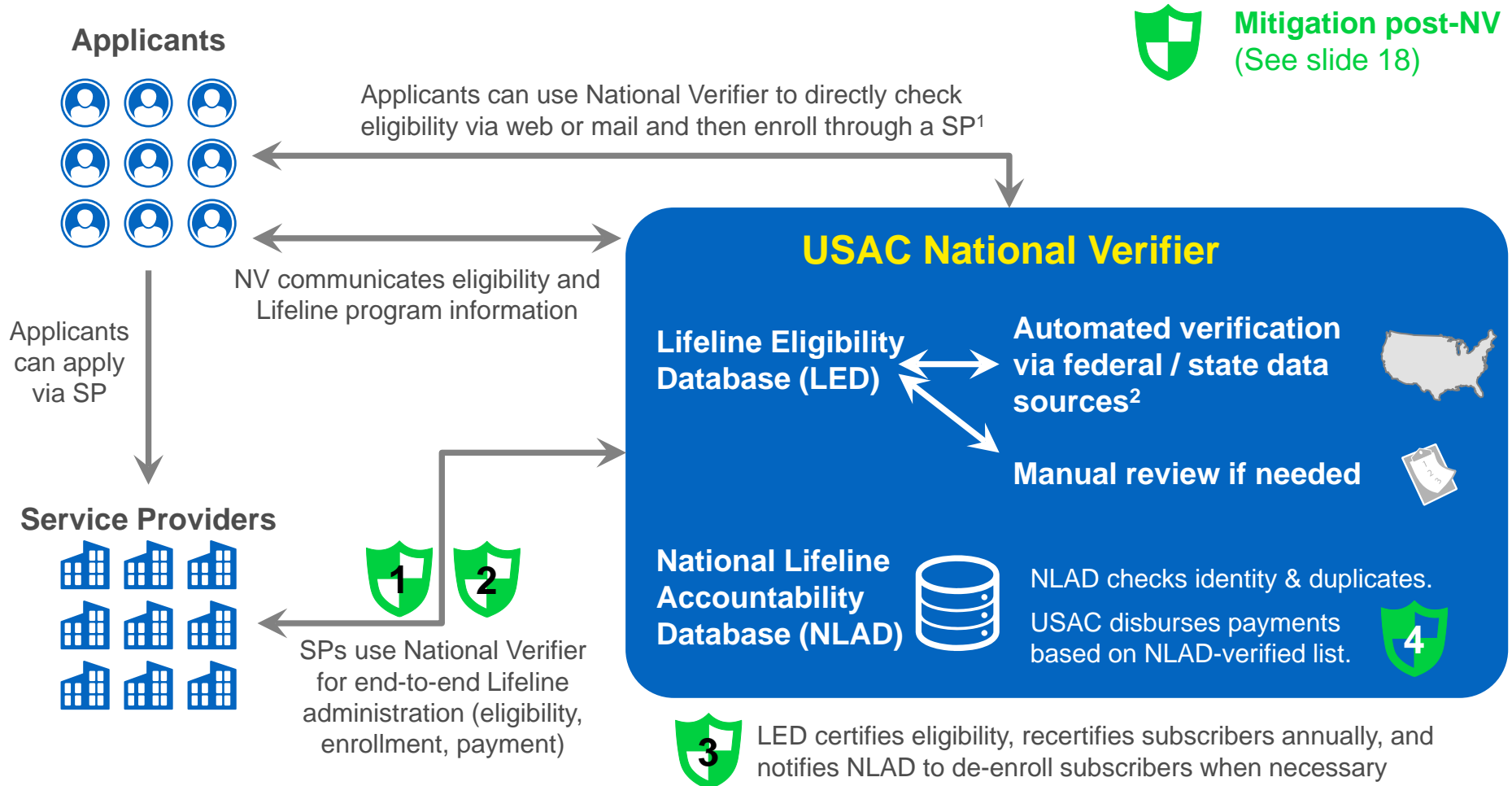
3. Bureau of Indian Affairs General Assistance, Tribally-administered Temporary Assistance for Needy Families, income-based Head Start, or the Food Distribution Program on Indian Reservations

Lifeline is moving from relying solely on service providers to conduct eligibility verification...



¹For example: Medicaid, SNAP, SSI

...to a model where USAC conducts eligibility verification through the National Verifier...



¹If eligible, applicant receives application number and list of nearby SPs

²For example, Medicaid, SNAP, SSI

...which is designed to address several program integrity risks in the current Lifeline program

Pre-NV program integrity risk



Service providers conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse



Variation in eligibility verification processes across service providers and states creates potential for confusion, errors, inconsistency



Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD



Payment complexity due to separate processes for enrollment and claims for reimbursement

NV mitigation strategy



Centralizes eligibility verification with USAC, a neutral party



Standardizes eligibility verification processes through the National Verifier

- More automated verification by pinging state and federal data sources increases accuracy
- Centralized manual reviews conducted by BPO vendor that adheres to consistent quality control standards



Automates recertification to re-confirm eligibility (removing need for self-certification for majority of subscribers)


Automates de-enrollment of subscribers due to non-response for self-certification



Unified NLAD / LED systems streamline ability to tie disbursements directly to subscribers claimed in NLAD

USAC is taking near-term steps to improve these risk areas in parallel to launching the National Verifier

Pre-NV program integrity risk


 **1** Service providers conducting Lifeline eligibility verification creates potential for waste, fraud, and abuse


 **2** Variation in eligibility verification processes across service providers and states creates potential for confusion, errors, inconsistency


 **3** Subscribers whose eligibility has lapsed may not be timely de-enrolled from NLAD


 **4** Payment complexity due to separate processes for enrollment and claims for reimbursement

Near-term mitigation strategy

 **1** USAC samples eligibility verifications performed by service providers, tracks activity by sales agent, and continues to enhance audit processes including the creation of a forensic audit program

 **2** USAC ensures that service providers are using the available state data sources to minimize manual review processes, and verifies this through sampling and audits

 **3** USAC samples recertifications performed by service providers, monitors for deceased subscribers who should no longer be claimed, and continues to enhance audit processes

 **4** Beginning with the January 2018 data month, service providers in all states are paid based on the number of subscribers in NLAD.

With the implementation of the National Verifier, USAC will conduct independent eligibility verification determinations

Service Providers

Facilitate consumer application process (unless Consumer Portal is used)

Support document upload for manual eligibility checks (if needed)

Provide consumer support as appropriate

Retain applicant-provided eligibility / identity documents according to Lifeline rules for new applicants

Check state sources (including manual review where necessary) to confirm consumer eligibility

Conduct annual recertifications¹

USAC

Conduct identity and duplicate checks (NLAD)

Process consumer applications and confirm eligibility prior to enrollment

Conduct all annual recertifications

Provide full service consumer support

Complete computer matching agreements with state and federal agencies

New roles

Reduced burdens

The NV also reduces burden on some state and federal agencies who currently share eligibility data with multiple service providers. Under the NV, the agencies only need to share data with one entity, USAC.

High-level overview of the system

Eligibility

Lifeline Eligibility Database (LED)

- One eligibility engine with many functions:
 - Query qualifying program data sources to determine eligibility;
 - Store yes / no eligibility results; and
 - Queue applications to BPO for manual review when necessary¹
- Portals for eligibility verification (e.g., consumer web portal)

Federal /
State data
sources



Enrollment

National Lifeline Accountability Database (NLAD)

- Database of all enrolled Lifeline subscribers for calculating payments to SPs;
- Services to check duplicate subscribers / addresses and verify identity; and
- Portal for subscriber updates



From a technical standpoint, LED and NLAD are tightly integrated as part of the single National Verifier solution to ensure a streamlined experience.

¹ For example, income verification or when applicant not found automatically in federal / state data sources

Functions and processes in place to support the system

Capabilities come from both internal and external sources

USAC capabilities

USAC / Lifeline team

Rigorous vendor management

Additional capacity for stakeholder engagement and development of computer matching agreements

Complex project planning and KPI tracking

Additional advanced data analytics to detect waste, fraud, and abuse

Vendor capabilities

Systems integrator

Built the National Verifier with all capabilities required to enable the timely and successful completion of its goals

Built the National Verifier to comply with all applicable security- and privacy-related standards and regulations

Test the National Verifier systems to ensure an optimal user experience

BPO provider

Manual processes and consumer call center to:

- Conduct manual eligibility reviews when automatic checks are not available
- Receive and process mail-in applications and IVR recertifications
- Support communication methods (e.g., mail recertification notices)

General consumer support, including all dispute resolutions

Total NV build remains on budget, and annual steady state cost estimates are lower than originally anticipated

Total Build Budget for the National Verifier

- After launching in all remaining states and territories in 2019, the NV build is slightly under the total budget.
- Costs to fully launch in the remaining nine states and territories are expected to fall within the total budget.

	2016 Estimate	Actual (through 2019)
National Verifier build grand total (\$) (costs incurred over ~3 years)	~\$35-\$40M	\$37M

Annual Steady State Estimate (beginning in 2020)

- Having operated the NV for over a year, we have better information on NV volumes and automated pass rates.
- USAC also has firm contracted rates with its vendor to continue supporting the NV.
- The steady state estimate has been updated to reflect this, as well as the current number of Lifeline subscribers.

	2016 Estimate	2020 Estimate
Verification: <ul style="list-style-type: none"> Application processing; Eligibility verification (automated / manual); and Recertification outreach. 	~ \$25-30M	\$9.8M
Consumer support:	~ \$10-15M	\$6.8M
Tech systems / tools:	~ \$4-6M	\$2.5M
Human capital:	~ \$3-5M	\$2.2M
Operations grand total (\$):	~\$40-\$55M	\$21.3M

See comparison to current costs incurred by SPs on next slide

NV direct verification costs expected to be half of direct verification costs previously incurred by service providers

Efficiencies gained by the National Verifier

Increased automated verification for enrollment

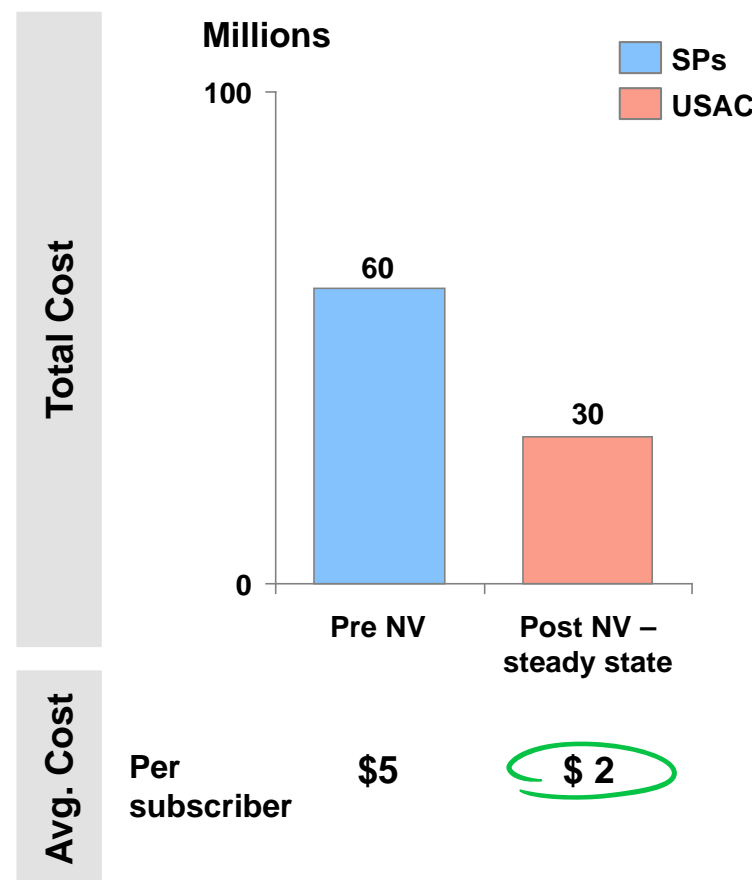
- Automated API link to federal and state data sources where possible; and
- Costly manual verification only if applicant is not found in a data source.

Automated verification and notification for recertification

- Costly outreach (e.g., mail and reminder calls / texts) only if subscriber is not found in a data source.

Larger volumes enable efficiencies of scale and drive down costs.

Estimated direct verification cost savings^{1,2}



¹ Only includes enrollment and recertification costs; does not include consumer support, tech systems, or human capital costs.

² In the NLAD opt-out states (CA, TX, and OR), the states continue to bear the cost of eligibility verifications. Oversight and coordination with the National Verifier ensures consistent quality and program integrity.

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Eligibility Data Sources: Executive summary

The National Verifier system connects with eligibility data sources to verify identity and determine if a Lifeline applicant is eligible.

NLAD has always utilized third party identification and address verification services. The National Verifier continues to use these services and also utilizes eligibility data sources.

USAC and the FCC are working with state and federal agencies, as well as Tribal governments who administer qualifying programs, to obtain access to eligibility information.

This process culminates in computer matching agreements between USAC, the FCC, and the entities who maintain eligibility program enrollment data. Finalized computer matching agreements are public documents and are available on USAC's website.

USAC has set up automated connections with 15 state databases and two federal, nationwide databases (CMS and HUD).

While applications in all states are queried against federal databases, not all states have connections to state databases. Any applications that cannot be verified through available databases require a manual review of submitted documentation.

The National Verifier interacts with distinct data sources to answer each question in the application process

Application question	Verification Step	Activity to complete	Data source
Does your personal information pass identity verification?	Identity & address check	Check applicant personally identifiable information (PII) against third party identity verification system (TPIV); conduct address verification;	NLAD
Are neither you nor anyone in your household currently receiving Lifeline?	Duplicate check	check applicant PII against those already enrolled in Lifeline	NLAD
Are you eligible for the Lifeline program?	Eligibility check	1st Step: Check applicant PII against automated data sources to determine if they are enrolled in a qualifying benefit program 2nd Step (if necessary): Conduct manual review to determine eligibility	1st Step: State or federal data sources of qualifying programs 2nd Step (if necessary): Eligibility documents from qualifying programs

Focus of this section

Eligibility data sources can be accessed in multiple ways

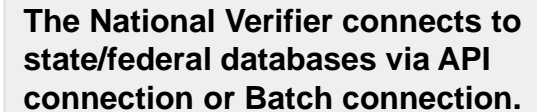
The National Verifier accesses eligibility data from available data sources through a variety of methods.

- **Application Programming Interface (API):** Connections that transfer data in real time on a per inquiry basis.
- **Batch Processing:** Connections that provide results for multiple inquiries on a regular basis - daily, weekly or monthly.

Due to technological or other constraints, the National Verifier may not always have an automated data source to verify a consumer's eligibility in every state or territory.
In these cases, consumers will need to submit eligibility documentation for review.

USAC and the FCC are pursuing as many automated connections as possible in order to streamline the process and allow for near real-time responses.

All states and territories have been successfully rolled into the National Verifier



Note: Chart illustrates the connections that are currently in place. OR and TX also rely on automated connections in conducting eligibility checks. USAC will continue to work with states that have launched with federal connections only to establish state connections if able.

Federal connections are utilized in all participating states, regardless of the connection type with the individual state. USAC is pursuing additional nationwide data sources (e.g., federal agencies that manage qualifying programs) to validate eligibility in all states and territories.

USAC and the FCC work closely with state agencies to develop connections where able

Initially, USAC makes contact with a state and scopes the work. USAC and the FCC may engage in the following activities with the state:

- Identify points of contact
- Conduct briefings for state officials about the Lifeline program and the National Verifier
- Determine technical and programmatic limitations and assets at the state level
- Socialize timelines and USAC business requirements with state officials
- Determine best connection type to pursue

If USAC, the FCC, and the state agency determine they would like to pursue an automated connection, USAC will:

- Execute a computer matching agreement, signed by the FCC, USAC, and the state agency, to ensure the data will be shared and used and the individual will not be unfairly denied benefits as required by the Privacy Act
- Execute an interconnection security agreement to ensure the data will be protected in accordance with the Privacy Act and in accordance with National Institute of Standards and Technology (NIST) guidelines and Federal Information Security Management Act (FISMA) requirements
- Establish agreed upon business and technical requirements
- Develop and test connection based upon technical requirements

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Process Flows and Descriptions: Executive Summary (1/2)

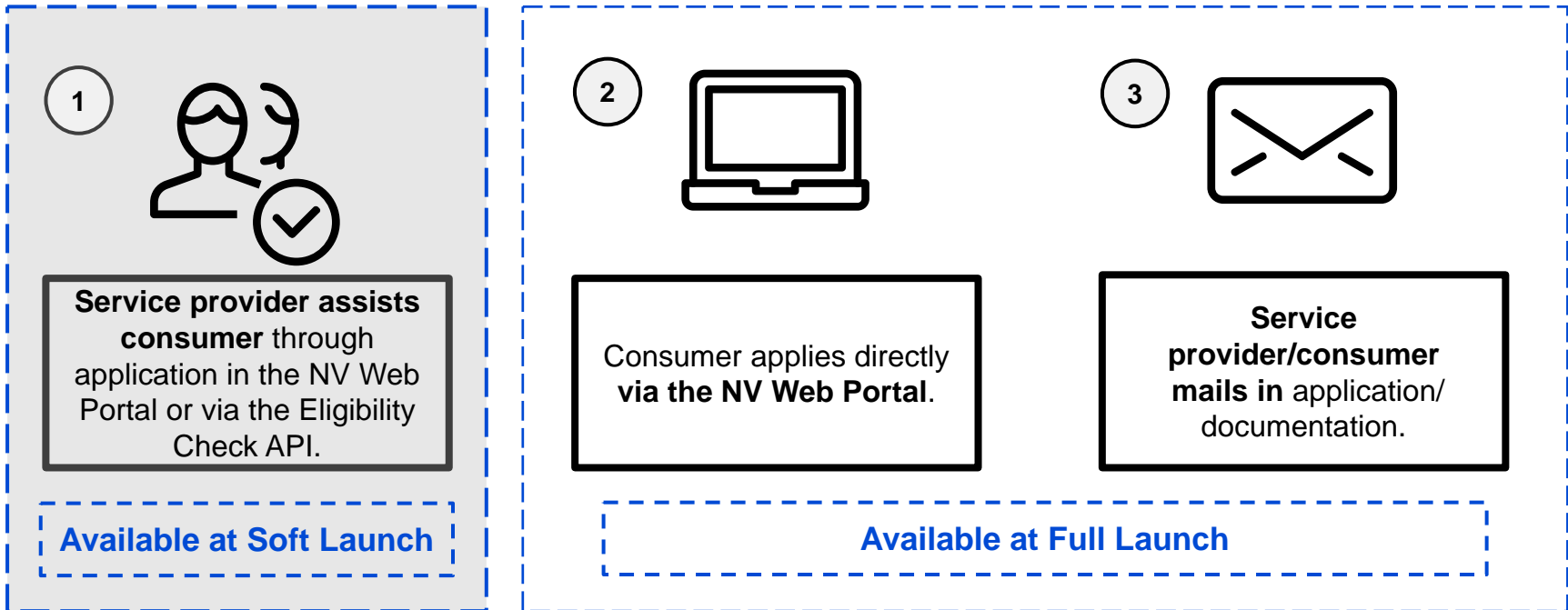
Seven key processes are supported by the National Verifier. These include:

- A** Eligibility Check
- B** Manual Review
- C** Consumer Information Update
- D** Benefit Transfer
- E** Recertification
- F** Reverification
- G** Claims and Disbursements

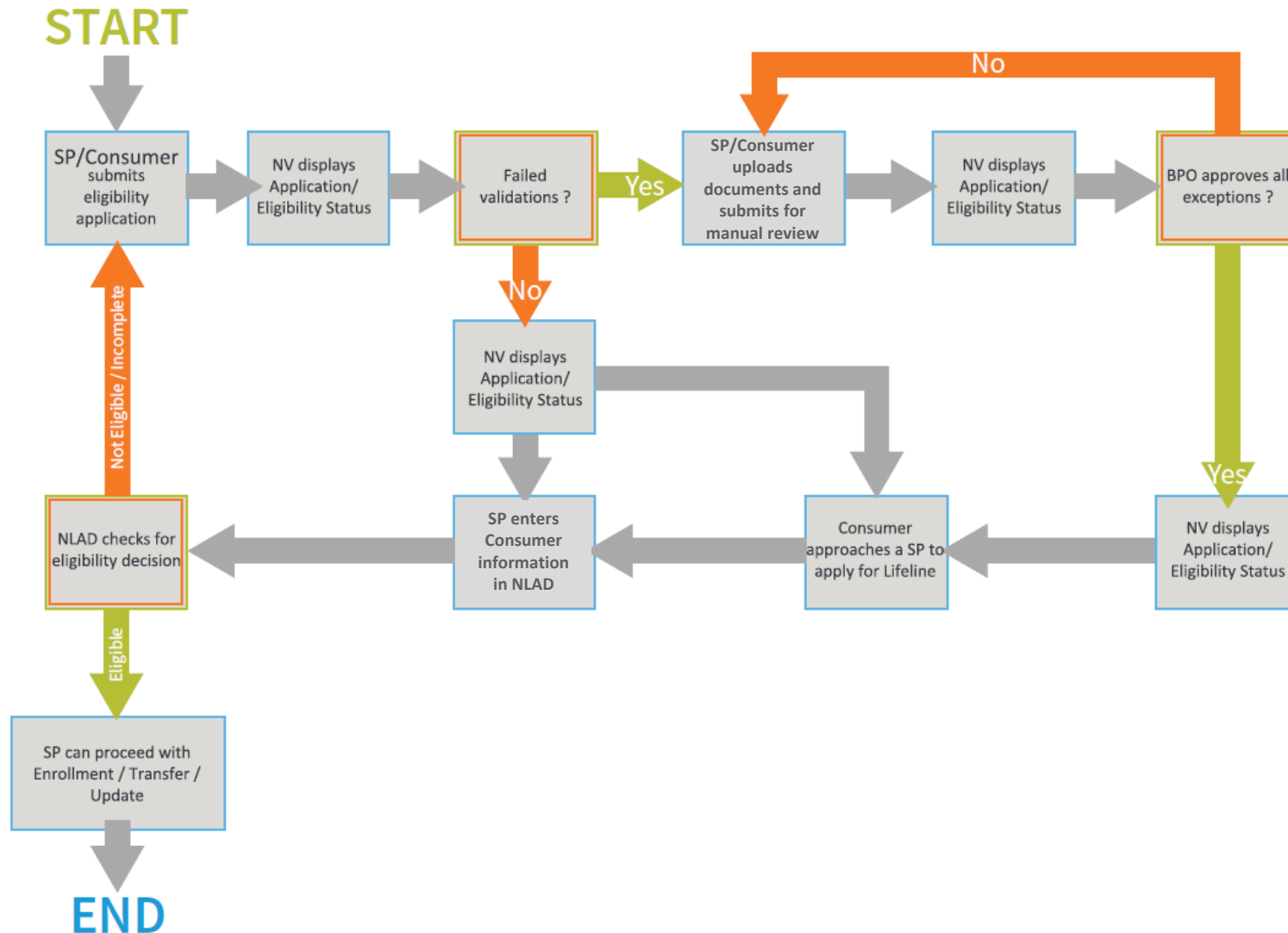
Process Flows and Descriptions: Executive Summary (2/2)

During soft launch, consumers will not have access to the portal and must work with a service provider to verify eligibility.

At full launch, consumers can apply on the portal without assistance from a service provider. In addition, service providers and consumers can mail in applications/documentation to USAC.



Process Flow: Eligibility Check



There are some key changes to the eligibility check process that accompany the launch of the National Verifier

Before the National Verifier

Service providers **conducted eligibility checks**

Consumers were typically **only able to check their eligibility for Lifeline via one method (through service providers)**

Not all consumers **were able to check their application or eligibility status online** at a centralized location

With the National Verifier (Full Launch)

The National Verifier system **centralizes eligibility verification**

Applicants check eligibility directly via the NV Web Portal, mail, or with assistance from a service provider

Consumers can **check their application and enrollment status online** or by contacting the Lifeline Support Center

Process Description: Service Provider Access

A service provider representative will log into the NV Web Portal using their credentials.

SP representatives are not permitted to share accounts; each user must have their own account. Representatives who already have NLAD accounts can use these credentials to log into the NV Web Portal.

With the implementation of RAD, SP representatives are now able to obtain a representative ID for tracking purposes. The existing NLAD/NV account management structure is utilized for RAD.

Please see slide 13 for more detail on the RAD processes.

If a service provider representative does not have an existing NLAD account, they must have their Admin grant them the appropriate access level. The representative will be given credentials that they can use for the Portal.

Process Description: Application with SP Assistance

1 GATHER INFORMATION

The representative will ask the consumer for their information and enter it into the system. Information includes name, address, date of birth, last 4 numbers of Social Security Number (SSN4) and qualifying program(s). With the implementation of the Eligibility Check API, this information may be collected via the carrier's system, such as through their website, and transmitted to the NV.

2 CONSENT, CERTIFY AND SIGN

The consumer must check a box indicating they consent to use their information to check if they qualify for Lifeline. The consumer must initial electronically that they agree to the Lifeline certifications and must type in their name to sign the application form. If using the Eligibility Check API, the consumer will be redirected from the carrier's website to the NV to perform this step.

Note: SP representatives cannot consent, certify or sign on the consumer's behalf.

3 RESULTS

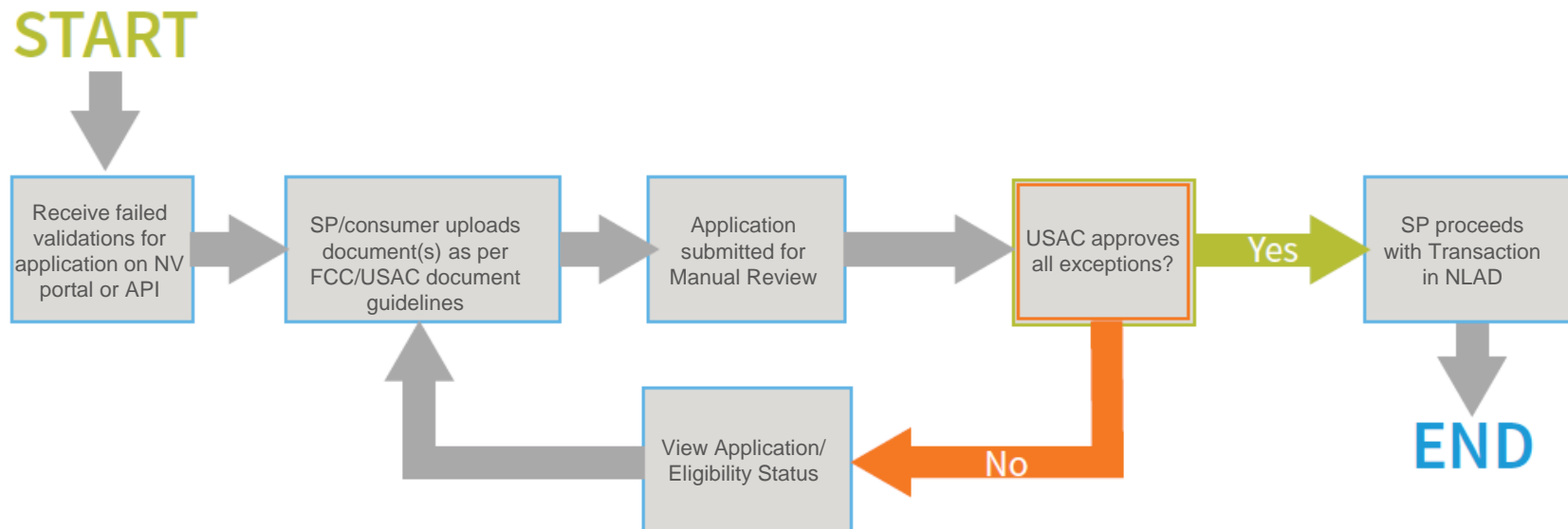
Once the service provider representative finishes assisting the consumer with the process, the representative will see the consumer's status and whether the consumer can be enrolled. Result types are on the next page.

Process Description: Result Types

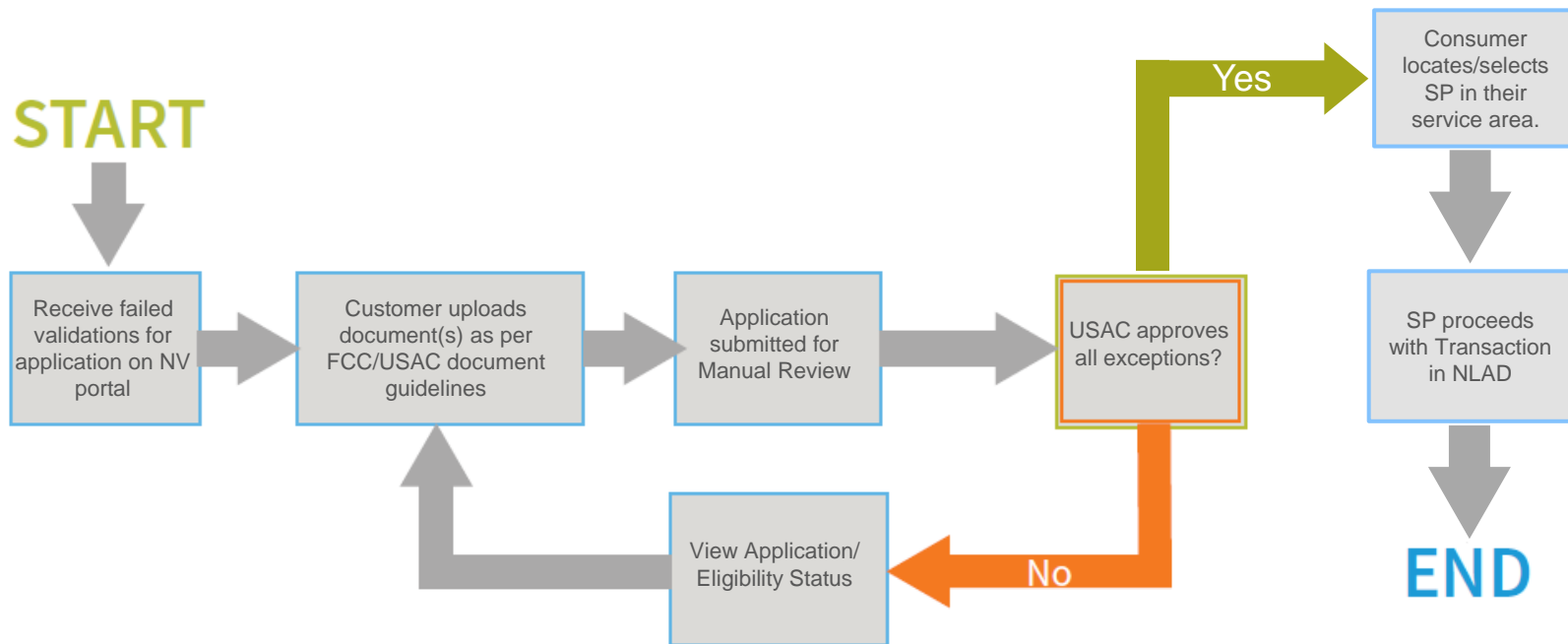
After submitting all of the required information, the system will return one of the following results types:

Result Type		Interpretation
"Already Enrolled in Lifeline."	➔	The consumer is already receiving Lifeline benefits, and no action is required. They can transfer their benefit to a new service provider, if desired.
"More Documentation Needed."	➔	The consumer's eligibility was not verified, and they need to submit documentation to prove their eligibility (which may include documents to support identity, address, program eligibility, etc.). <i>Please see the next process flow on Manual Review for more detail.</i>
"Pending Review."	➔	The consumer's Application Form is still under review by the Lifeline Support Center and an eligibility decision is pending.
"Pending Batch Decision."	➔	The consumer's eligibility is being confirmed by their state eligibility data source (may take up to 1-3 days). Users are able to submit documentation to resolve all potential errors prior to receiving an eligibility determination.
"Qualified."	➔	The consumer is eligible for the Lifeline benefit and can be enrolled in NLAD. The consumer needs to be added to NLAD within 90 days or their "Qualified" eligibility result will expire.
"Pending Certification."	➔	The consumer is eligible for the Lifeline benefit, but must complete the Lifeline certifications before a service provider can enroll them in NLAD.

Process Flow: Manual Review (Service Provider)



Process Flow: Manual Review (Consumer)



There are some key changes to the manual review process in the National Verifier system

Before the National Verifier

Service providers manually reviewed documentation on **behalf of the consumer**

After the National Verifier (Full Launch)

Consumer submits required documents directly via the **NV Web Portal or mail**, and can ask for assistance from a service provider representative if needed

There was **variation** in **manual eligibility review procedures**

The Lifeline Support Center **centralizes** and **standardizes manual reviews**

Process Description: Error Types

An application may result in an error that requires the consumer to submit additional documentation* for Lifeline Support Center manual review.

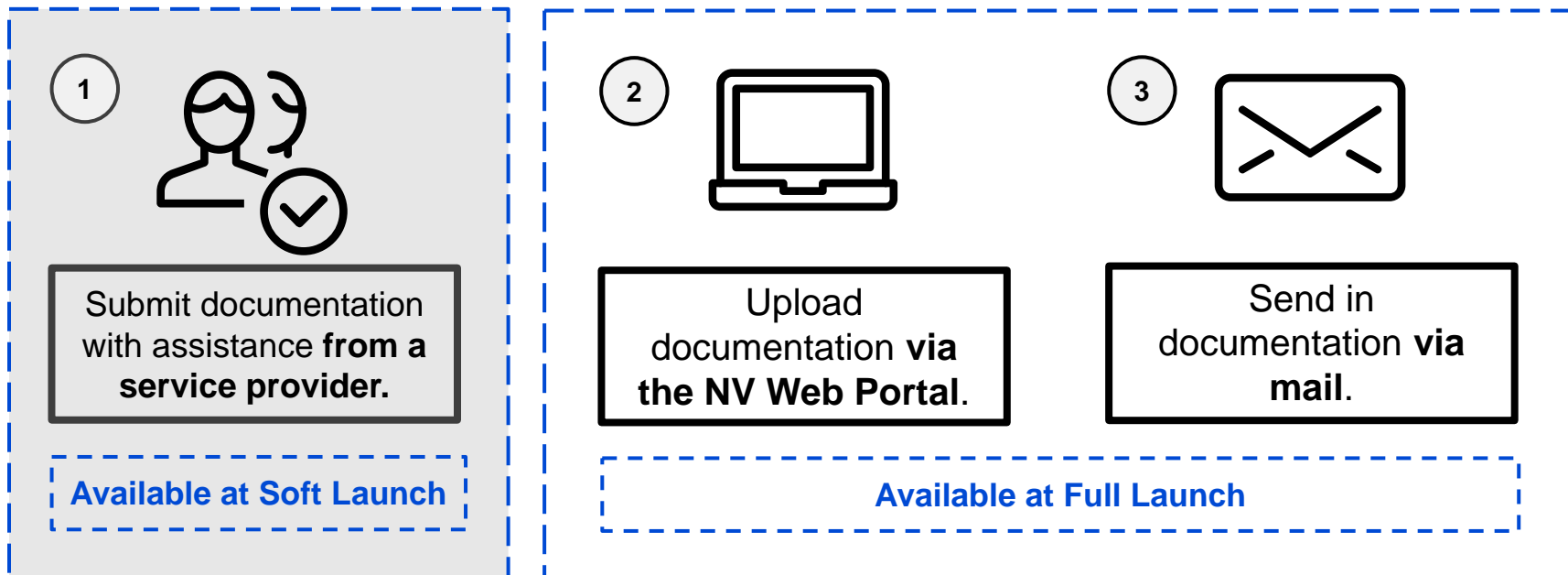
The following errors require additional documentation that must be mailed in or uploaded to the NV Web Portal.

Error	Document Required
TPIV (Identity Verification Error)	Proof of identity
AMS (Address Verification Error)	Proof of residential address
Duplicate Address	Household Worksheet
Under 18	Proof of emancipated minor status
Program Eligibility	Proof of program/income eligibility
Deceased Subscriber	Proof of life

**A list of acceptable documents can be found on the [NV website](#).*

Process Description: Document Submission

If the consumer receives an eligibility error, they will be notified of the specific error type associated with their application.¹ Consumers may choose to submit documentation through the following methods.



¹ For applications through the portal, key information is communicated directly to the SP and /or consumer via the portal. Additional communication may arrive through email or mail, depending on if the consumer provided an email address during the application process.

Process Description: Document Submission Results

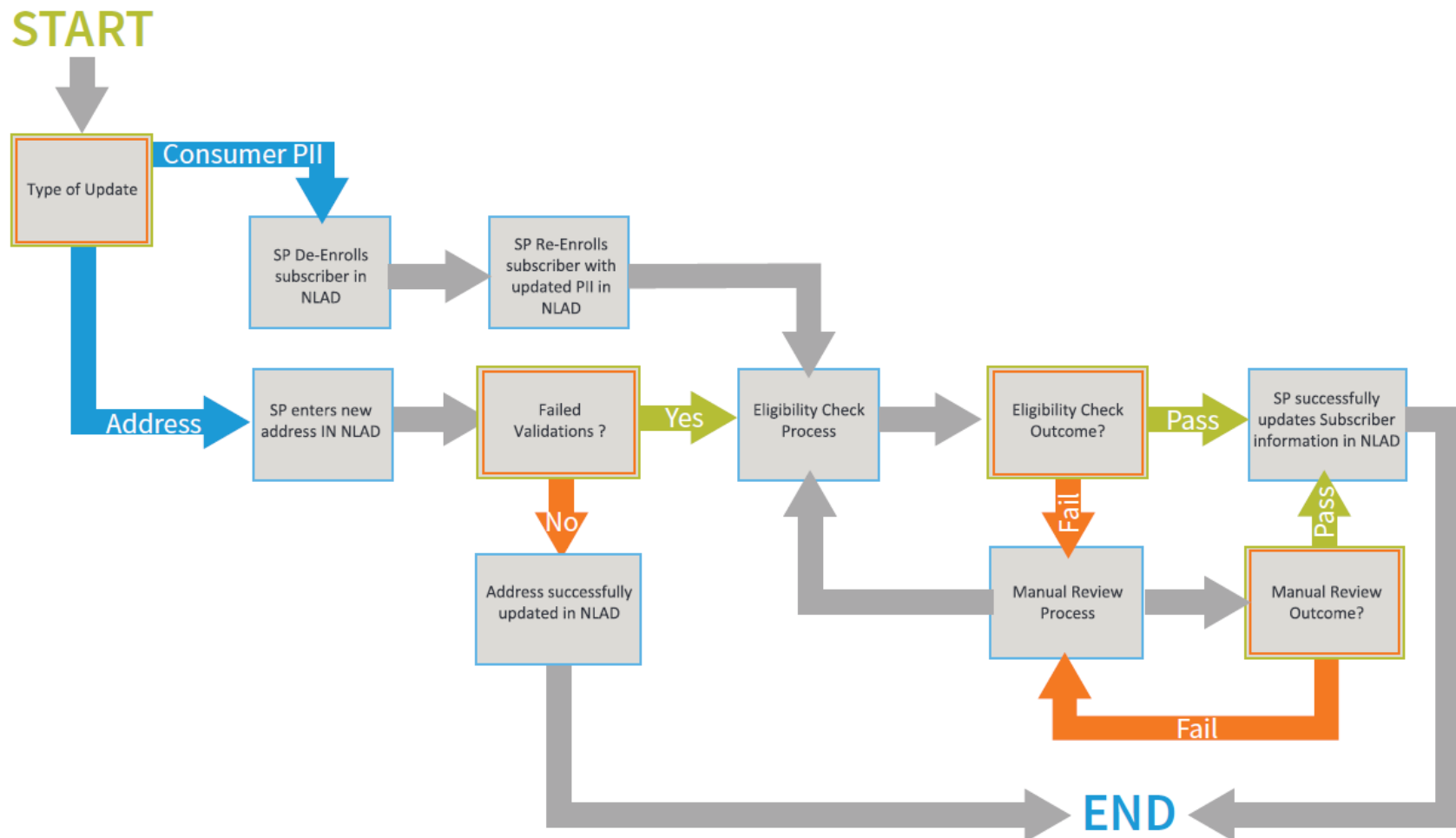
After the service provider or consumer uploads all required supporting documents for manual review, the NV will display a confirmation message to confirm that USAC is reviewing the application to verify the consumer's eligibility to receive Lifeline support.

- If the eligibility check was initiated through a service provider via the SP portal or Eligibility Check API, the service provider can also assist the consumer in checking their eligibility status. Result types are available on slide 38 in the Eligibility Check section. If the consumer is eligible, the service provider will see their updated eligibility status.
- If the eligibility check was initiated by a consumer, their status will be provided to them by mail, email, and/or on the consumer portal (depending on their preferred method of contact).

Upon notification that the consumer is “Qualified,” the consumer can select a service provider and request to be enrolled in NLAD.

If the consumer's eligibility still cannot be verified after the documentation review, they can end their application process or ask a SP representative for assistance in submitting the necessary documentation to address the errors. The consumer can also dispute the result of the manual review.

Process Flow: Consumer Information Updates



Process Description: Consumer Information Updates

When the service provider is trying to update the Subscriber's address:

A Service Provider can only update a Subscriber's address in NLAD.

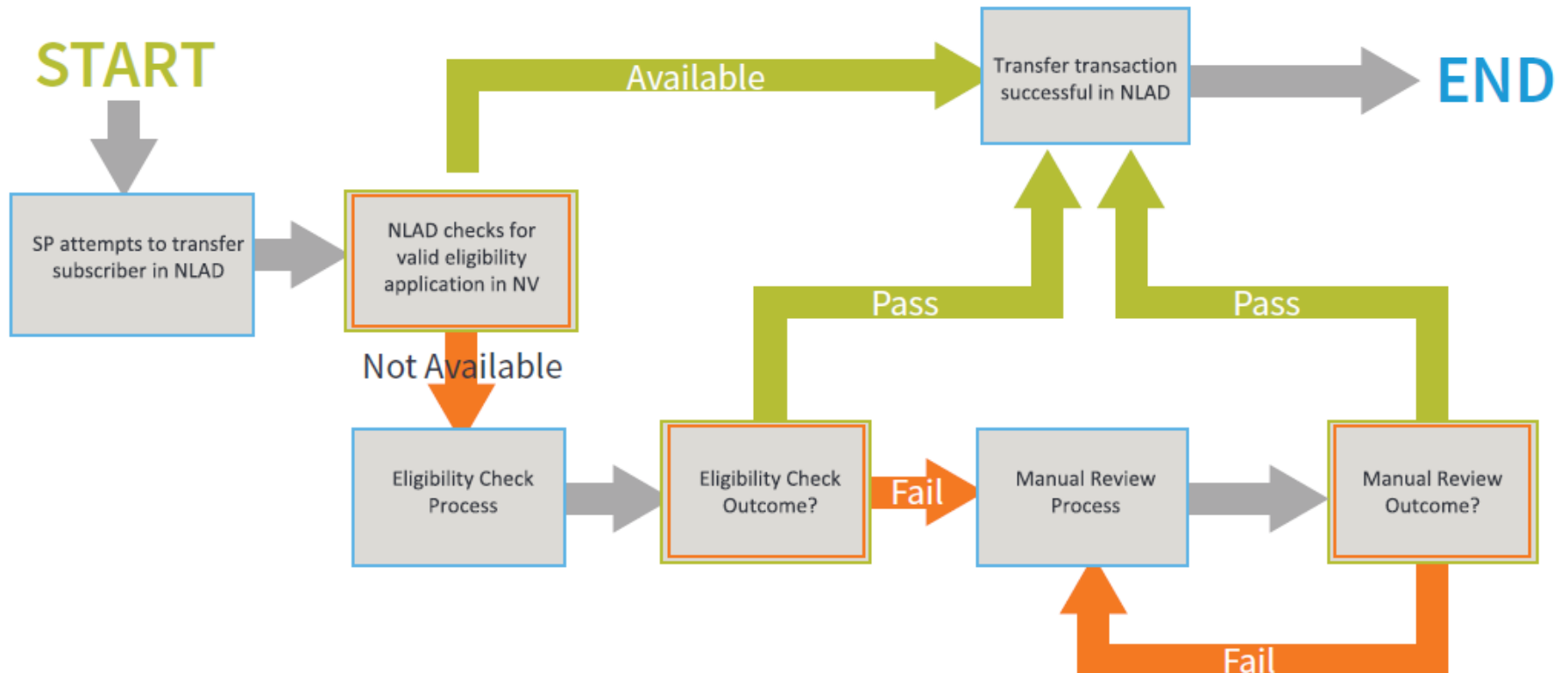
- If the new address passed all validations, the update transaction in NLAD goes through successfully.
- If the new address fails the validations, NLAD checks LED to determine whether an application exists:
 - If an application is found, the consumer's new address must pass the address validations and must not be already in use by another subscriber to receive Lifeline. If there are address failures, all failures must be resolved for the Update transaction in NLAD to go through successfully.
 - If no application is found, the SP will have to submit a new application through the portal or Eligibility Check API and ensure the address is validated or ensure address failures are resolved before the Update transaction can go through successfully.

In order for a service provider to edit any other field (first/last name, DOB, L4SSN, Benefit Qualifying Person (BQP) information):

The service provider must first de-enroll the subscriber from NLAD and then re-enroll with the corrected PII. When this happens, NLAD will check LED for a qualified application.

- If a qualified application is found, the Enroll transaction in NLAD goes through successfully.
- If no application is found, the SP will have to submit a new application through the portal or Eligibility Check API before the Enroll transaction can go through successfully.
- If during the eligibility check, the subscriber has failed any validation check, they need to resolve those issues before the Enroll transaction can be successful.

Process Flow: Benefit Transfer



There are some key changes to the benefit transfer process in the National Verifier system.

Before the National Verifier

New service provider representative
initiates benefit transfer in NLAD

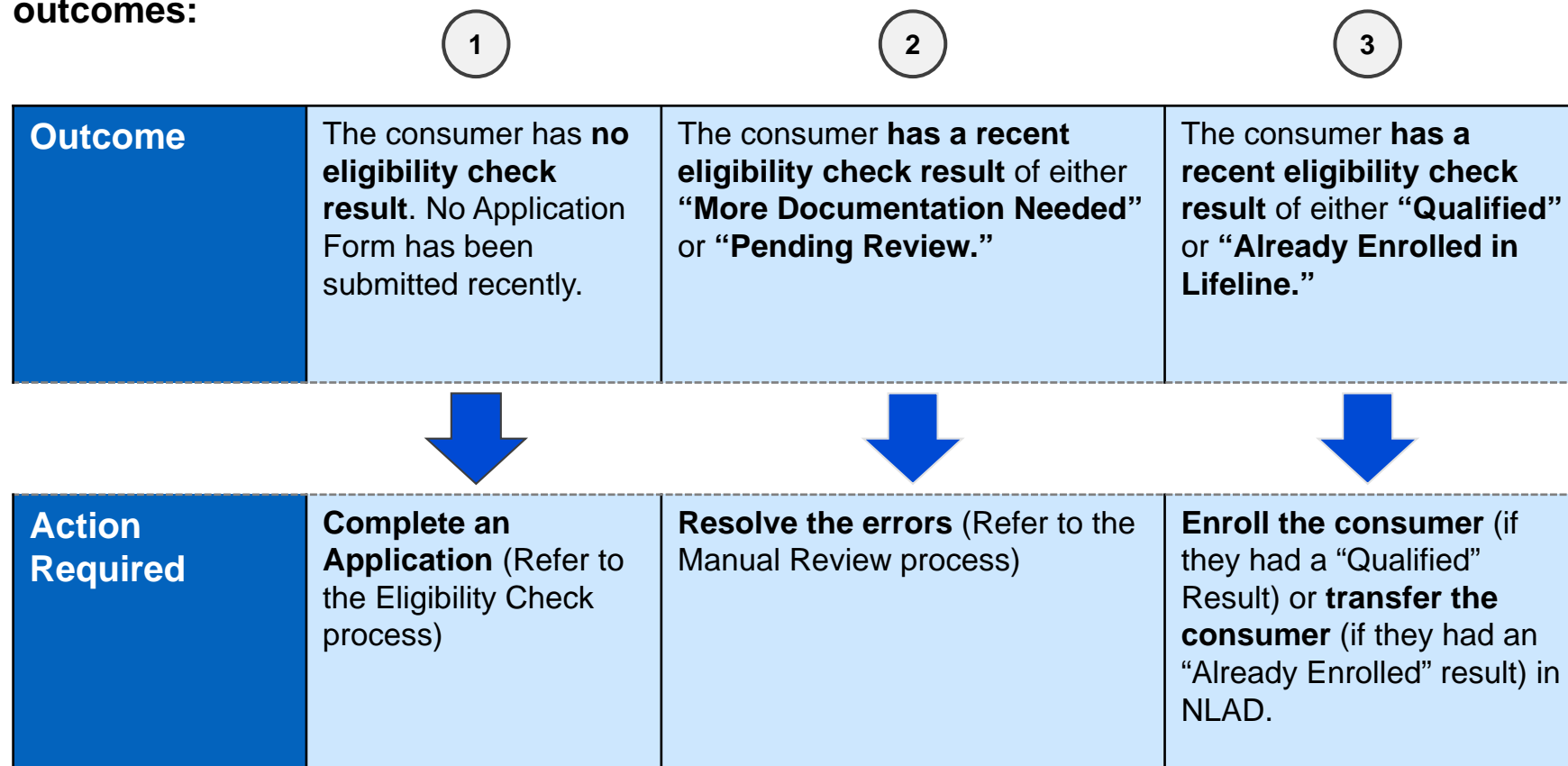
After the National Verifier

Benefit transfers cannot occur in NLAD
unless **NV contains a successful
eligibility check** for the consumer

Process Description: Benefit Transfer

The new service provider representative logs into NLAD or uses the NLAD API and submits the consumer's PII to check if the consumer has qualified within the last 90 days.

Through this check, the service provider representative will see one of three possible outcomes:



Process Description: Benefit Transfer

Ultimately, the consumer must have an “Already Enrolled in Lifeline” or “Qualified” eligibility result to successfully transfer their benefit or enroll in Lifeline.

Depending on the outcome of the NLAD check, they can arrive at these statuses through one of the following methods:

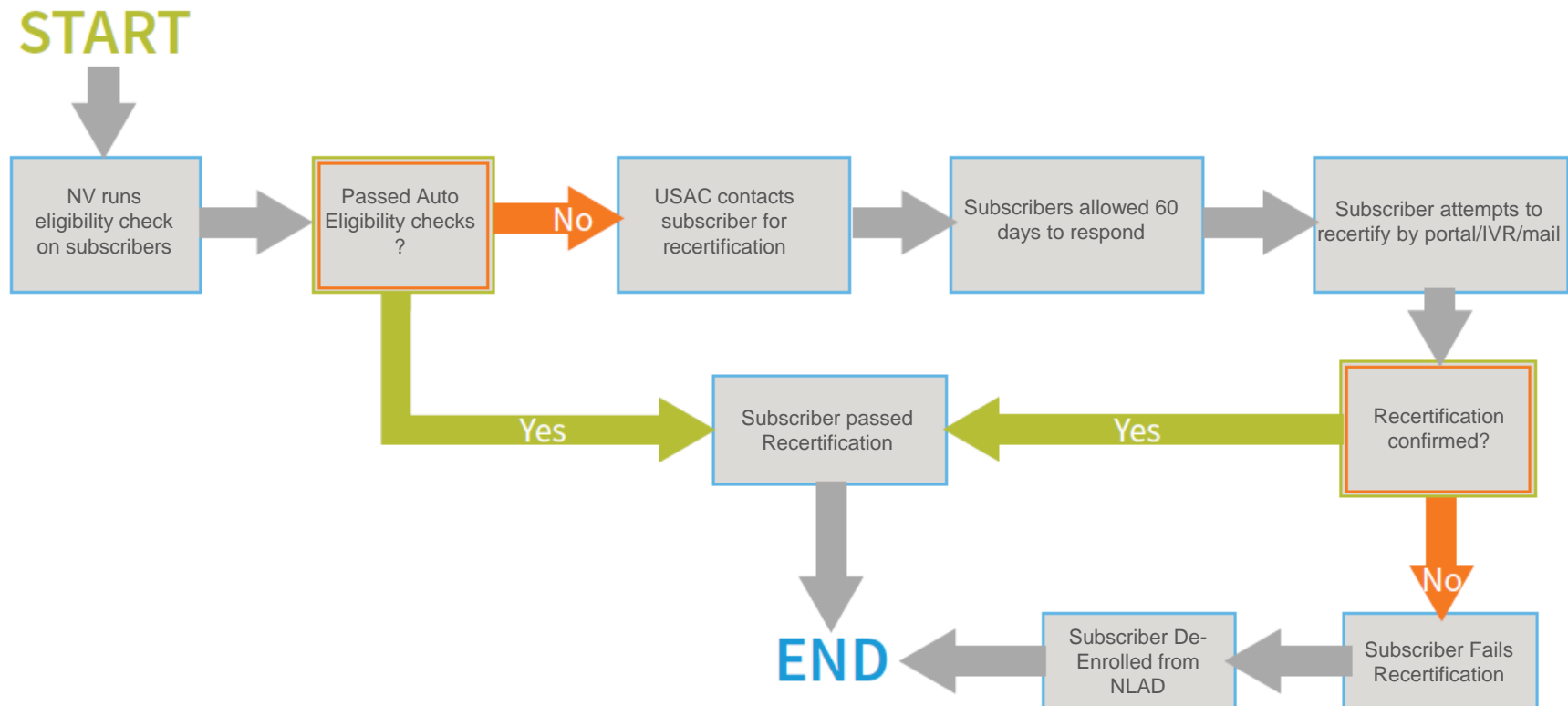
- The NLAD check results in an initial eligibility status of either “Qualified” or “Already Enrolled in Lifeline.”
- The consumer sees either of these statuses after completing an Application.
- The consumer sees either of these statuses after resolving the errors associated with their Application.

Once the consumer has the “Already Enrolled in Lifeline” status, the service provider representative can perform the benefit transfer in NLAD. NLAD will:

1. Label the consumer as having been transferred as the result of a benefit transfer.
2. Notify the old and new service providers of the change.
3. End the benefit transfer transaction.

The SP should notify the consumer of the outcome.

Process Flow: Recertification



There are some key changes to the recertification process in the National Verifier system.

Before the National Verifier

Service providers **led recertification** or opted for USAC-led coordination

Service providers **de-enrolled consumers who did not manually self-certify**

After the National Verifier

NV **automates recertification** and **prompts consumer action** when necessary

NLAD automatically **de-enrolls** consumers if they do not pass the automated recertification check and do not manually self-certify

Process Description: Recertification (1/4)

Consumers already receiving a Lifeline benefit must recertify their eligibility every year to continue receiving their benefit.

The National Verifier will complete recertification on a rolling basis, based on the consumer's Anniversary Date. Service providers will no longer conduct recertification in NV states.

The National Verifier will:

- Automate recertification via available state and federal data sources.
- Allow consumers the opportunity to conduct manual self-certification when they do not pass the automated recertification check.*
- Provide dynamic status reporting to service providers to track their customers' recertification results.

In states where the National Verifier has fully launched, consumers who do not pass the automated recertification check must go through official USAC manual self-certification processes via the NV Web Portal, IVR, or mail. Consumers in these states cannot manually self-certify through any other processes.

*The 2019 Lifeline Order requires eligibility documentation to be collected in certain instances during annual recertification, which was previously not required. These changes are not yet effective, and thus are not reflected in the process descriptions of this plan.

Process Description: Recertification (2/4)

If a consumer does not pass automated recertification, they will receive a letter from the Lifeline Support Center offering multiple ways to manually self-certify. Below are the different processes through which a consumer can manually self-certify:



1. Manually self-certify directly **via the NV Web Portal.**



2. Manually self-certify directly **via IVR.**



3. Manually self-certify directly **via mail.**

Process Description: Recertification (3/4)

Service providers have a time period when they can reach out to the consumer and encourage manual recertification. Below is an example timeline detailing when the service provider can assist with this process.

Automated Recertification Check Occurs

Lifeline Support Center letter sent (will occur no later than 60 days from their Anniversary Date)

Consumer's 60-day window to manually self-certify

Consumer must manually self-certify by this date

Consumer's Anniversary Date

Service providers can provide educational outreach about recertification **prior to the recertification window.**

First Month						
1	2	3	4	5	6	7
8	9	10	11	12	13	14
15	16	17	18	19	20	21
22	23	24	25	26	27	28
29	30	31				

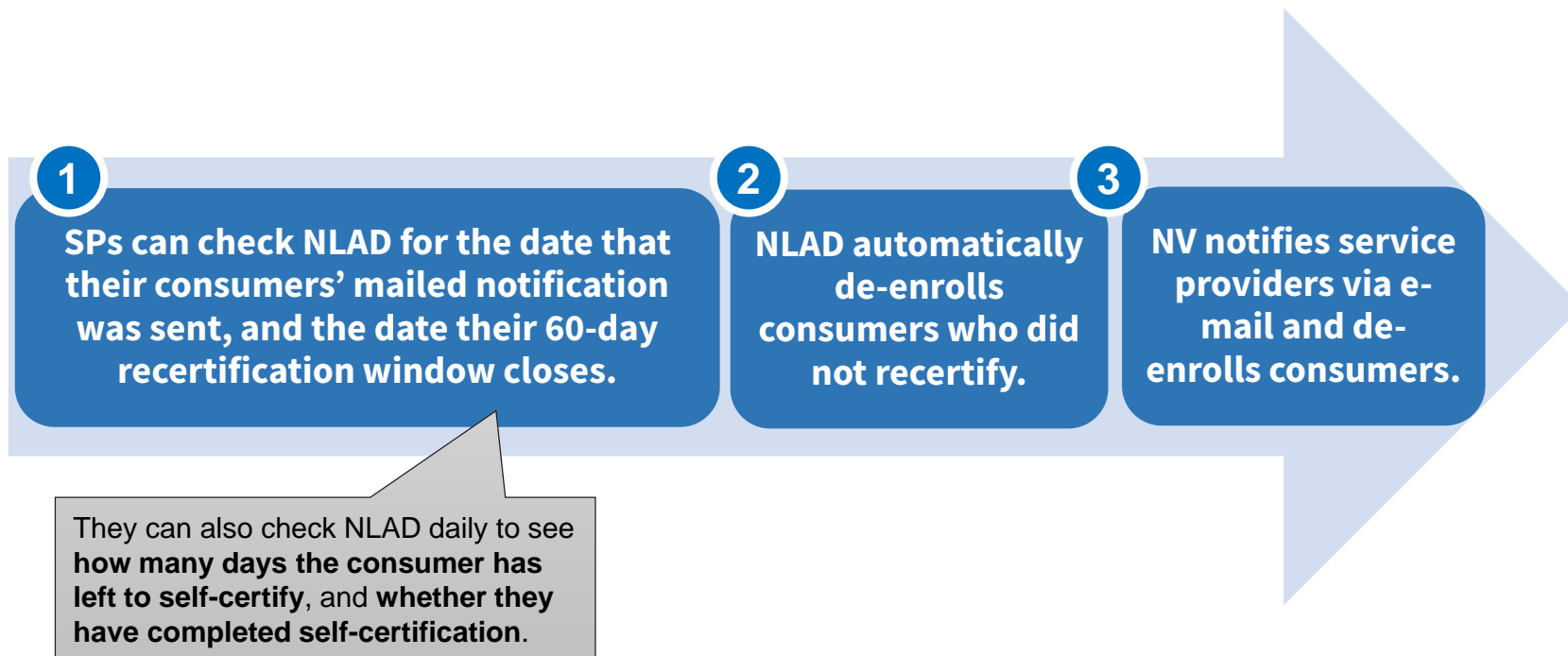
Second Month						
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

Third Month						
					1	2
3	4	5	6	7	8	9
10	11	12	13	14	15	16
17	18	19	20	21	22	23
24	25	26	27	28	29	30

Note: Dates are for illustrative purposes only

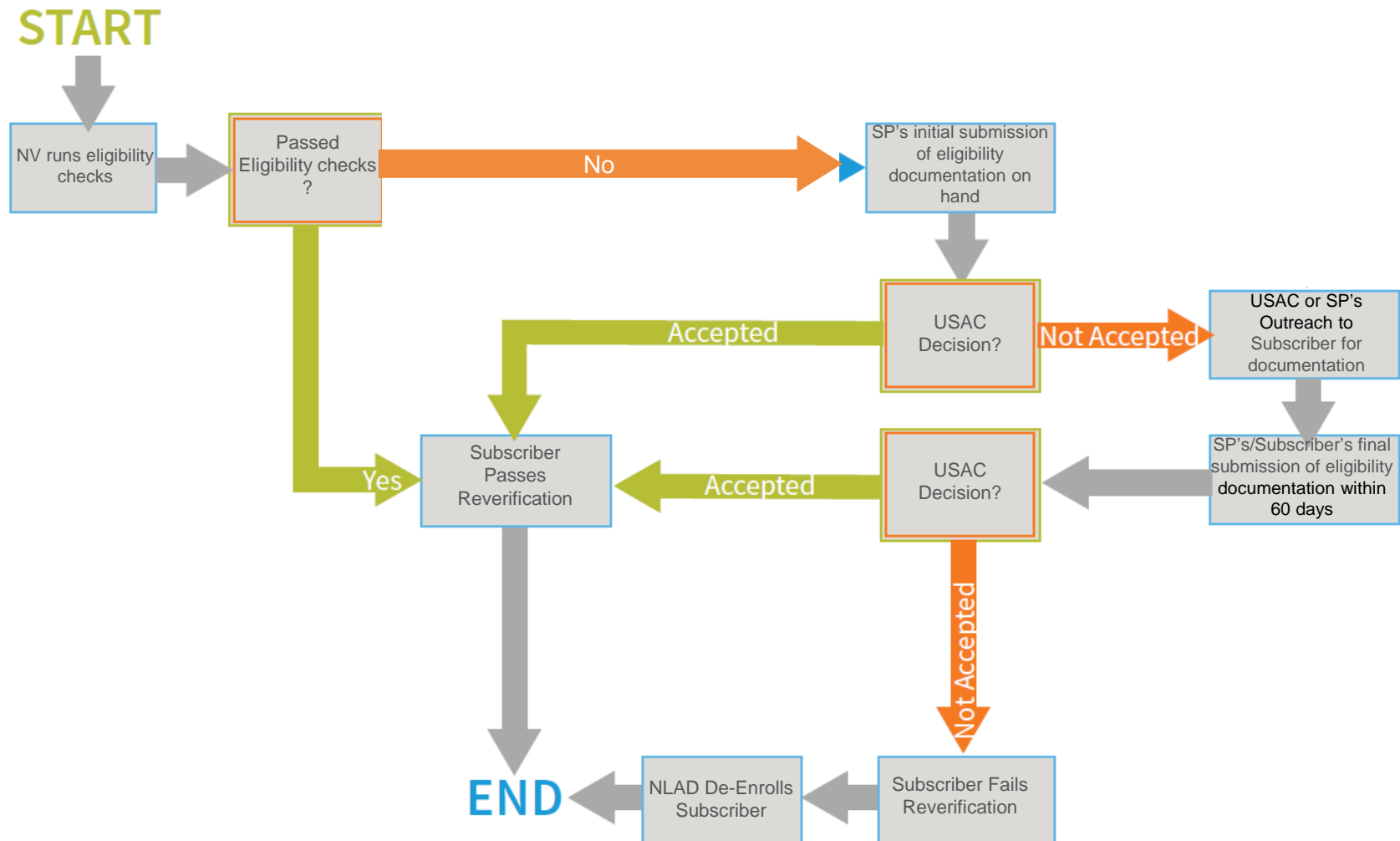
Process Description: Recertification (4/4)

If consumers do not successfully manually self-certify within 60 days of their Lifeline Support Center letter being sent, they will be automatically de-enrolled. NLAD will compile a list of consumers who did not recertify, de-enroll them, and notify the consumers and their respective service providers. The de-enrollment process is below:



Note: Service providers will also have access to relevant recertification information via NLAD reports.

Process Flow: Reverification



Process Description: Reverification (1/3)

When the National Verifier launches in a state, the eligibility of all Lifeline subscribers in that state will be reverified.

- USAC will run existing NLAD subscriber records through the National Verifier to conduct an automated eligibility check (database check)
- If the National Verifier cannot confirm the consumer's eligibility, service providers must follow the reverification process and submit documentation to confirm the subscriber's eligibility before their information is accepted by the National Verifier
 - Service providers must submit on-hand documentation to USAC based upon subscriber enrollment date (requirements around age of documentation will vary depending on the enrollment date)
 - If on-hand documentation is not sufficient or is too old, USAC will conduct consumer outreach to attempt to resolve eligibility failures, unless service provider chooses to perform the outreach themselves

Process Description: Reverification (2/3)

Reverification is the one-time process to confirm that all existing Lifeline subscribers meet the National Verifier's eligibility standards.

Reverification is different from annual recertification.

Main differences:

- Reverification happens once, when the National Verifier launches in a state.
- Service provers must complete reverification for all existing subscribers; it is not related to when they last recertified.
- Reverification resets the subscriber's anniversary date and fulfills the annual recertification requirements.

Process Description: Reverification (3/3)

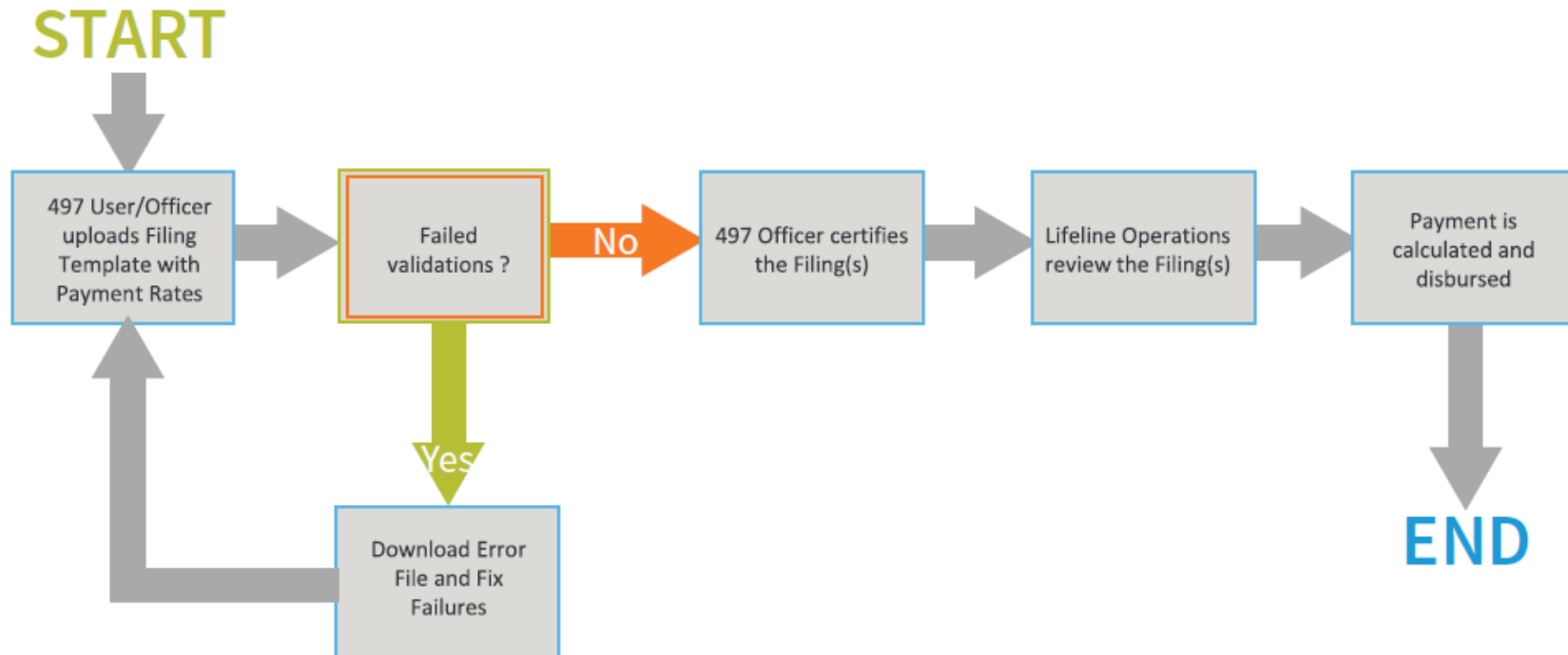
USAC will reverify subscribers in states, as they are rolled into the National Verifier, in four groups, based on their Lifeline enrollment date:

- **Group 1:** Subscribers recently enrolled (date will vary by launch) at the time of soft launch. Documentation collected at enrollment may be accepted. USAC gives 45 days for documents to be submitted.
- **Groups 2 & 3:** Subscribers enrolled prior to the Group 1 cut-off date. USAC will conduct outreach to collect updated/recent eligibility documentation.¹ USAC gives subscribers 60 days to submit documentation.
- **Group 4:** Subscribers enrolled through the legacy process during the soft launch period. Documentation collected at enrollment may be accepted. USAC gives 45 days for documents to be submitted.

Documentation outreach and collection is only necessary for consumers that are not automatically verified. USAC contacts SPs first and then to consumers as needed. For additional instructions please reference the USAC [website](#).

¹Service provider may opt out of USAC conducting outreach and would therefore conduct the outreach themselves.

Process Flow: Claims and Disbursements



This process applies to all service providers in all states regardless of NV launch status.

Process Description: Claims and Disbursements

What is new about this process:

The FCC Form 497 was retired after the December 2017 data month filings.

For data months prior to January 2018, claims were submitted using the FCC Form 497.

Starting with the January 2018 data month, all service providers in all states began using the new Lifeline Claims System (LCS). In this new system, service providers:

- (1) Download a report of subscribers eligible for reimbursement from NLAD.
- (2) Add the dollar amount for subscribers being claimed (or reason code for subscribers being unclaimed), before certifying/submitting the filing for processing.
- (3) Carriers in NLAD opt-out states will not download their list of eligible subscribers; they will upload their subscriber lists directly to LCS. Under the National Verifier, the state commissions in NLAD opt-out states will submit data to the National Verifier in order for USAC to validate carrier claims.

What remains the same:

Service providers are still required to submit a claim (even if there are no changes since previous month).

Snapshot taken on the first day of the month shows the subscriber count for the prior month.

- For example: A snapshot taken on February 1 shows the subscriber count for the January data month.

Service providers to receive reimbursement in the same month if claim is certified by the 8th of the month.

Options to report quarterly or up to one year after data month.

Lifeline reimbursement claims do not result in any automatic de-enrollments.

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Success Metrics: Executive Summary

Establishing the right metrics is critical to monitoring the success of the National Verifier.

Key performance indicators (KPIs) must measure the success of the National Verifier based on goals outlined in the 2016 Lifeline Order:

- Reducing waste, fraud, and abuse to improve program integrity;
- Improving consumer experience; and
- Reducing cost and complexity.

Thus far, we have identified four primary key performance indicators (KPIs) to track. (KPIs are listed on slide 66.)

- USAC leadership reviews these primary KPIs to facilitate data-driven executive decision making.
- These KPIs complement broader Lifeline metrics that are regularly monitored.
- The KPIs may evolve over time to ensure the National Verifier continues to meet the FCC's objectives.

USAC will also monitor additional general program metrics (e.g., transaction volume, recertification percentage) to identify anomalies and outliers.

Based on goals in the 2016 Lifeline Order, we have identified KPIs to measure the success of the NV

GOALS	1 Stronger Program Integrity	2 Enhanced Consumer Experience	3 Cost Effectiveness
	<p>Protect against and reduce fraud, waste and abuse</p> <ul style="list-style-type: none"> • Increase accountability of Lifeline program; and • Reduce payments for ineligible subscribers. 	<p>Improve consumer experience in the enrollment process</p> <ul style="list-style-type: none"> • Streamline consumer application channels; Provide consumer support; and • Reduce complexity. 	<p>Lower costs through increasing administrative efficiencies</p> <ul style="list-style-type: none"> • Provide automated eligibility verification; and • Streamline processes for enrollment, recertification, & reimbursement to SPs.

The biggest one-time impact on Program Integrity and Cost Effectiveness is the reverification process conducted when a state rolls into the National Verifier.

This process will de-enroll consumers that are not found in the databases to which USAC has connected and cannot provide necessary documentation to prove their eligibility.

Key Metrics and KPI Matrix

These key metrics will help USAC monitor the success of the National Verifier in the three key areas of **Program Integrity**, **Cost Effectiveness**, and **Consumer Experience**.

	KPI/Metric	Program Integrity	Consumer Experience	Cost Effectiveness
1	% of Enrollments Requiring Manual Review	✓	✓	✓
2	Repeat Cases (Customer Service or Application Processing)	✓	✓	✓
3	Processing Time		✓	✓
4	Actual versus Projected Volumes			✓

We also use data analytics (e.g., transaction volume, recertification percentage) to track for anomalies and outliers across a number of general program metrics.

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User Support: Executive Summary

Proactively engaging key stakeholders is critical to the success of the National Verifier. Stakeholder feedback helps USAC understand the implications of the decisions we make for those who interact with the National Verifier regularly.




To best assist stakeholders, USAC has implemented a comprehensive training plan for service providers as the National Verifier has launched. Training content includes:

- Live courses delivered via webinar
- Live service provider office hours to answer questions in between webinars
- Supplemental user support materials, including user guides and how-to videos

USAC will continue to engage stakeholders through:

- Webinars
- Outreach calls
- Educational content

Three types of supplemental materials were created to assist users outside of formal trainings

	Material	Description	Sample Topics
	User Guide	<ul style="list-style-type: none">• Provide comprehensive guidance on system navigation and use• Break concepts into small, intuitive sections with step-by-step instructions	<p>Service provider (SP) functions including:</p> <ul style="list-style-type: none">• Pre-Production• Address Resolutions• Updating Consumer Addresses
	How-To Videos	<ul style="list-style-type: none">• Deliver detailed step-by-step instructions on how to perform specific functions• Incorporate screen captures	<ul style="list-style-type: none">• Eligibility Check as a SP• Document Submission as a SP
	Video Overviews	<ul style="list-style-type: none">• Deliver detailed step-by-step instructions on how to perform specific functions• Incorporate screen captures	<ul style="list-style-type: none">• Overview of the National Verifier SP portal

These materials are available to service providers on USAC’s website.

Service providers can contact USAC through multiple avenues

Dedicated Soft Launch Support Sessions

- USAC holds regular service provider assistance sessions after soft launch.
- These sessions are hosted live on GoToWebinar, and USAC answers questions and collects user feedback.

Lifeline Support Center Accessibility

- The Lifeline Support Center customer service representatives are able to answer questions from service providers submitted via e-mail and phone.
- The Lifeline Support Center is available to carriers and consumers from 9 a.m. to 9 p.m. ET, Monday through Sunday.
 - **Carrier and Customer Lifeline Support Center: 1-800-234-9473**

USAC provides additional training and support sessions upon hard launch

USAC gathers feedback from National Verifier launch participants to refine and update training and support sessions. Training and support at full launch includes:

- Webinars
- How-To Videos
- Video Overviews
- Office Hours

These trainings include launch-specific information. Training materials are posted on USAC's website after training sessions.

USAC also engages stakeholders after their states are launched through:

- **National Verifier system demonstrations:** USAC walks stakeholders through the National Verifier consumer and service provider portals.
- **Monthly calls with NARUC:** USAC shares information with and gathers feedback from representatives of the states about the National Verifier system and processes.
- **Newsletter outreach:** USAC shares National Verifier updates in the Lifeline monthly newsletter.
- **Tribal Engagement:** USAC attends Tribal workshops and meetings to provide updates on the National Verifier and hear Tribal-specific feedback and questions
- **Web content:** USAC maintains a National Verifier-dedicated section on USAC.org to inform stakeholders about systems and processes.
- **Industry engagement:** USAC meets regularly with groups such as state and national telecommunication associations.

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Privacy and information security: Executive Summary

Privacy and data security have been key considerations throughout the development of the National Verifier and its associated processes.

- USAC obtained the Authority to Operate (ATO) prior to the launch of the National Verifier in compliance with the Federal Information Security Modernization Act (FISMA) and National Institute of Standards and Technology (NIST) requirements.¹
- USAC's Privacy and Security Teams have been, and will continue to be, key contributors and integral partners throughout the design and implementation process.
- USAC will ensure that the National Verifier continues to adhere to all applicable federal and state security and privacy requirements standards, inclusive of any vendors or contractors who may work on or with the NV.

The National Verifier and its associated processes are designed to minimize risks stemming from data collection and retention.

- The National Verifier will collect the minimum amount of PII required to successfully execute on its goals.
- USAC will maintain an appropriate data retention policy for all applicant / subscriber data.
 - All data retention policies will comply with USAC and FCC records schedule(s).

¹ NLAD also adheres to all relevant FISMA and NIST requirements. NLAD, which includes the RAD functionality, has an ATO.

The NV and its related processes must comply with federal privacy and security laws

USAC supports the FCC in administering federal programs. Therefore, USAC adheres to federal privacy and security regulations, including but not limited to the Privacy Act and FISMA.

The National Verifier is a designated federal system of records. The system has undergone FISMA authorization, completing the six-step Risk Management Framework (RMF) established by NIST.

FISMA authorization for the National Verifier helps to ensure that the system is secured, that the proper NIST security and privacy controls are operating effectively, and that the system undergoes continuous monitoring. Any changes or modifications to the National Verifier will be assessed and the controls, processes and/or system security plan (SSP) will be updated accordingly.

USAC has also implemented appropriate privacy controls such as obtaining consent, collecting and using the minimum amount of PII necessary, and using PII only for authorized purposes.

USAC vendors and subcontractors are contractually required to meet the same federal security and privacy requirements as USAC.

USAC continues to invest resources into additional testing for the National Verifier to ensure the reliability, availability, and security of the system.

The NV is designed to minimize data collection and retention to the extent possible in order to limit exposure to risk

Subscriber / process information: Keep limited information (including some PII)

Information provided by subscribers

- Name (First, Last)
- Address (including geolocation data)
- Date of birth
- Social Security Number (last four digits)
- Eligibility for enhanced Tribal subsidy
- Self-reported qualifying program(s)
- Preferred method of communication
- Contact information (e.g., phone, email)
- Type of service (e.g., broadband, mobile)
- Submitted documents (e.g., for manual review)

Fields typically
transmitted to query
eligibility sources

Data generated through National Verifier processes

- Yes / no decision on eligibility from each data source queried (i.e., each program)
- Date of verification
- Application channel (e.g., mail, web portal)
- Name and unique ID of individual SP employee performing any transaction

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USAC response to Frequently Asked Questions (1/4)

FAQ

USAC response

What are the functions of the National Verifier system?

The National Verifier system:

- Determines initial consumer eligibility
- Conducts annual recertification
- Populates the Lifeline Eligibility Database (all subscribers deemed eligible for the Lifeline Program)
- Tracks all subscribers enrolled in Lifeline through NLAD
- Records sales agent information in order to log agent activity

What is the difference between soft and hard launch?

The primary difference is that at soft launch, only service providers are able to use the NV. At hard launch, the consumer NV Web Portal also is available.

Starting at soft launch, service providers have the option to start using the service provider NV Web Portal and NV forms, but are not mandated to do so until the hard launch. Service providers also have the option to use the Eligibility Check API beginning at soft launch.

USAC response to Frequently Asked Questions (2/4)

FAQ

USAC response

How can service providers access the NV Web Portal?

Service provider representatives can use their existing NLAD credentials in order to access the service provider NV Web Portal. If they do not have existing credentials, a person with Service Provider Administrator credentials in NLAD can create new service provider accounts.

The NLAD account types have the same permissions in the service provider NV Web Portal, and varying permissions in NLAD depending on the user type.

Is there an API that permits SPs to interact with the NV?

Based on stakeholder feedback, USAC built an Eligibility Check API that allows authorized SP systems to communicate directly with the NV to verify consumer eligibility and check the status of applications.

Is the NV Web Portal available in Spanish?

Yes, the consumer NV Web Portal and printed versions of forms are available in Spanish. The service provider NV Web Portal is only available in English at this time.

USAC response to Frequently Asked Questions (3/4)

FAQ

USAC response

What is the difference between applying and enrolling? Can the NV Web Portal be used to enroll a consumer?

The National Verifier enables consumers, and service providers assisting them, to apply for Lifeline by checking their eligibility. Consumers must be eligible for Lifeline and receive a "Qualified" status before they then can be enrolled in Lifeline.
The NV cannot be used to enroll consumers in Lifeline; enrollments must occur in NLAD.

What are the different ways that consumers can check their eligibility for the Lifeline benefit?

A consumer can apply or check their eligibility for Lifeline with the assistance of a service provider via the service provider NV Web Portal or Eligibility Check API (available at soft launch), the consumer NV Web Portal (available at hard launch), or a printed version of the Application Form or a paper application submitted via mail to the Lifeline Support Center (available at soft launch).

When do consumers need to provide documentation?

When consumers apply, there is a possibility that the NV will be able to verify their eligibility automatically (if they are qualifying through a program that has an automated data source) and no additional documentation will be needed to validate a consumer's eligibility.
If there are errors associated with a consumer's application, they will need to provide additional documentation to resolve the errors in order to eventually receive a "Qualified" eligibility status. In addition, if the consumer is qualifying through a program that cannot be checked using an automated data source, the consumer will need to provide documentation so that their eligibility can be checked manually.

USAC response to Frequently Asked Questions (4/4)

FAQ

USAC response

Is a NV Web Portal account needed in order to use the NV Web Portal?

All consumers using the consumer NV Web Portal or service provider representatives using the service provider NV Web Portal must have their own individual accounts. No one is allowed to share accounts with another person.

What is the process for qualified consumers to select a carrier?

If a consumer applies via the service provider portal and is found qualified, the service provider can enroll them into NLAD immediately after receiving a qualified eligibility decision from the National Verifier.

If a consumer qualifies via a paper application, the consumer will be notified by mail of their qualified status and will need to contact a participating Lifeline service provider to be enrolled into NLAD.

If a consumer qualifies via the consumer NV web portal, they will be taken to a “Qualified” screen which will provide instructions to enroll with a carrier. Like with paper applications, the consumer will need to contact a participating Lifeline service provider to be enrolled into NLAD to receive the Lifeline benefit.

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Glossary (1/4)

Term	Definition	Explanation
AMS	Address Management System	A service provided by the U.S. Post Office that allows subscribers to verify the existence of an address, and to standardize it into proper format.
API	Application Programming Interface	A code that allows two software programs to interact with one another. The API defines the correct methods by which a developer can write a program that requests services from another application.
BPO	Business Process Outsourcing	The process of contracting non-primary business activities to a third-party vendor (e.g., consumer support / service, manual review support).
BQP	Benefit Qualifying Person	If an individual is not eligible for the Lifeline Program discount, but has a child or dependent that is eligible, the individual qualifies for Lifeline based on the status of their child/dependent. The eligible child/dependent, in this case, is the BQP.
CMA	Computer Matching Agreement	The computerized comparison of records for the purpose of establishing or verifying eligibility for a federal benefit program.
Data use agreement	Data use agreement	A formal agreement between two parties to establish protocols and standards that govern the handling (including storage) of any data transferred between the parties.
Dispute resolution	Dispute resolution process	A process by which USAC, through the National Verifier, will review an adverse decision upon the request of the applicant.
FCC	Federal Communications Commission	An independent agency of the United States Federal Government charged with regulating interstate and international communications by radio, television, wire, satellite and cable in all US states and territories.
Form 497	Form filled out by Lifeline SPs to claim Lifeline subsidies	Form for service providers that have provided eligible consumers with Lifeline Program-supported service to receive reimbursement for providing service at discounted rates. This form is no longer being used to receive reimbursement after the December 2017 data month.

Glossary (2/4)

Term	Definition	Explanation
IEH	Independent Economic Household	A unit that may only receive one Lifeline benefit (commonly known as the one-per-household rule); also refers to a form that certain consumers must submit in order to certify that no more than one Lifeline benefit is received per household.
IVR	Interactive Voice Response	Technology that allows humans to interact with a computer over the phone, through use of speech recognition and/or the telephone keypad.
KPI	Key Performance Indicator	A business metric used to evaluate performance with respect to factors crucial to the success of the National Verifier.
LCS	Lifeline Claims System	An online filing system for service providers to submit original and revised claims for providing eligible consumers with Lifeline Program-supported service to receive reimbursement.
LED	Lifeline Eligibility Database	System to check whether a consumer is eligible for Lifeline based on income or enrollment in qualifying assistance programs.
NARUC	National Association of Regulatory Utility Commissioners	National association representing state public service (utility) commissioners.
NLAD	National Lifeline Accountability Database	Existing system that allows SPs to check on a real-time, nationwide basis whether a consumer is already receiving a Lifeline Program-supported service, and to maintain records of Lifeline subscribers.
NV	National Verifier	A system to conduct eligibility determinations and other functions necessary to enroll eligible subscribers into Lifeline.
PII	Personally identifiable information	Any information about an individual that can be used to distinguish or trace an individual's identity either alone or when combined with other information that is linked or linkable to a specific individual.

Glossary (3/4)

Term	Definition	Explanation
RFP	Request for Proposal	A document issued by an organization that desires to procure services or commodities; the document typically outlines the services or commodities desired and initiates the formal procurement process.
RAD	Representative Accountability Database	RAD was created to allow USAC to track a representative's transactions in NLAD and the National Verifier. Representatives register for a Representative ID through RAD and then provide that Representative ID to the service providers for which they perform Lifeline transactions.
SI	Systems Integrator	A company that specializes in integrating multiple component subsystems or parts into a single system.
System of Records	System of Records	A group of records under control of any federal agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.
SORN	System of Records Notice	A notice in the Federal Register in which a federal agency announces the establishment, amendment, or deletion of a system of records.
SP	Service Provider	A telecommunications company that provides service (i.e., wireline voice, wireless voice, wireline broadband, wireless broadband) to consumers.
States	States, territories, and Tribal lands	50 U.S. States + DC, Puerto Rico, Guam, U.S. Virgin Islands, Northern Mariana Islands, American Samoa, and Tribal lands.
TPIV	Third party identity verification	A service that verifies the existence of a person who corresponds to the PII submitted by an applicant by using public and private records (e.g., birth certificates, real estate ownership, credit history).
UI/UX	User Interface / User Experience	The components of a system with which humans interact, as well as the actual experience of an end user's interaction with the system.

Glossary (4/4)

Term	Definition	Explanation
USAC	The Universal Service Administrative Company	A non-profit corporation designated by the Federal Communications Commission (FCC) as the permanent administrator of the Universal Service Fund (USF), which includes the Lifeline program.
USF	Universal Service Fund	A fund, established by the Telecommunications Act of 1996, whose goal is to ensure that every American has access to vital telecommunications services; the Lifeline program is a component of the USF.
Verifier Partner	A data source used to check for Lifeline eligibility	An agency or organization (often, but not exclusively, governmental) that partners with the National Verifier to provide a data source that the National Verifier can check in order to determine whether an applicant is eligible for the Lifeline subsidy.