

# USAC Request for Information (RFI) #LI-23-132 for Automated Income-Based Eligibility Verification Tool

## I. PURPOSE

Universal Service Administrative Company (USAC) is issuing this Request for Information (RFI) seeking information from US-based companies with the ability to provide a software application that can be installed or called as a service from other USAC software applications that can verify the applicant's eligibility for the Lifeline & ACP program benefits based on household income. This RFI aims to provide USAC with the latest information on solutions that are available to automatically verify income based on personally identifiable information (PII) and share the verification results in real time (or near real time). Please note that this is not a solicitation for products and/or services and this inquiry will not result in an award or contract.

The specifications and information gathered from responses to this RFI will be used to evaluate the offerings of the current marketplace and may lead to the development and preparation of a formal Request for Proposal (RFP). For simplicity, USAC will refer to Automated Income-Based Eligibility Verification as 'AIEV' throughout the remainder of this RFI. USAC is soliciting information from commercial vendors, application service providers, associated integration service providers, and other interested parties capable of assisting USAC in identifying a software solution that can be configured or customized to check the reported income and share the results with USAC systems. USAC Lifeline/ACP would share the applicant's Personally Identifiable Information (PII) with the vendor using an automated connection (i.e., API) to validate applicants' income information without applicants submitting their income documents.

Furthermore, USAC would be interested in the provider providing support with the configuration, customization, implementation, and training. Information submitted by any interested party will be done so voluntarily and with the understanding that this RFI is for information-gathering purposes only and is not a formal solicitation. Similarly, cost ranges will be used solely to analyze and establish a target budget. Information presented during this information-gathering process will not be considered a response to any solicitation subsequently issued by USAC.

Respondents may be asked to provide a demonstration of their products and services. This would include a guided tour of their product, business capabilities, and technology. Demonstrations may be presented through Internet web conferencing. USAC will make no compensation for demonstrations.

## II. BACKGROUND

Through its administration of the Universal Service Fund ("USF") programs on behalf of the Federal Communications Commission ("FCC"), the Universal Service Administrative Company ("USAC") works to promote the availability of quality telecommunications services at just, reasonable, and affordable rates, and to increase access to advanced telecommunications services throughout the nation. Specifically, the USF programs fund expanding telecommunications and broadband access to rural communities, healthcare facilities, schools and libraries, and low-income households. Through program administration,



auditing, and outreach, USAC works with contributors, service providers, and program beneficiaries to achieve the goals articulated by the FCC for the High-Cost Program, Lifeline Program, Rural Health Care Program, and Schools and Libraries Program.

USAC strives to provide efficient, responsible stewardship of the programs, each of which is a key national asset in making important telecommunications and Internet services available to consumers, healthcare providers, schools, and libraries throughout the United States. The program divisions are supported by additional USAC personnel in other divisions, including Finance, General Counsel, Information Systems, Audit and Assurance, Enterprise Program Management, and Human Resources.

Consistent with FCC rules, USAC does not make policy nor interpret unclear provisions of statutes or the FCC's rules. The USF is funded by contributions from telecommunications carriers, including wireline and wireless companies, and contributions from interconnected voice over internet protocol ("VoIP") providers, including cable companies that provide voice service, based on assessing their interstate and international end-user revenues. These contributions are typically passed to consumers through a universal service fee line item on their telephone bills.

## **High-Cost Program**

The High-Cost Program is designed to ensure that consumers in rural, insular, and high-cost areas have access to modern communications networks capable of providing voice and broadband service, both fixed and mobile, at rates that are reasonably comparable to those in urban areas ("High Cost"). High Cost fulfills this universal service goal by allowing eligible carriers who serve these areas to recover some of their costs from the USF. Like all USF programs, the administration of High Cost has undergone significant modernization in the last several years to increase innovation and ensure beneficiaries have access to updated technology. USAC developed and now leverages the High-Cost Universal Broadband Portal ("HUBB"), which allows participating carriers to file deployment data showing where they are building out mass-market, high-speed internet service by precise location. This information includes latitude and longitude coordinates for every location where service is available. USAC displays this information on a public-facing map to show the impact of high-cost funding on broadband expansion throughout the United States.

## Lifeline Program & Affordable Connectivity Program (ACP)

The Lifeline Program provides support for discounts on broadband and voice services to eligible low-income households ("Lifeline"). USAC uses its centralized application system, the Lifeline National Eligibility Verifier ("National Verifier"), to verify consumer eligibility through proof of income or the consumer's participation in a qualifying federal benefits program, such as Medicaid, the Supplemental Nutritional Assistance Program ("SNAP"), Federal Public Housing Assistance, or Veterans and Survivors Pension Benefit. The Affordable Connectivity Program is an FCC benefit program that helps households afford the broadband they need for work, school, healthcare, and more. The benefit provides a discount of up to \$30 per month toward internet service for eligible households and up to \$75 per month for households on qualifying Tribal lands. Eligible households can also receive a one-time discount of up to \$100 to purchase a laptop, desktop computer, or tablet from participating providers if they contribute more than \$10 and less than \$50 toward the purchase price. USAC reviews processes regularly to increase



compliance, identify avenues for operational improvements, and refine program controls, such as audit processes.

## **Rural Health Care Program**

The Rural Health Care Program supports healthcare facilities in bringing medical care to rural areas through increased connectivity ("RHC"). RHC consists of two main component programs: (1) the Telecommunications Program ("Telecom") and (2) the Healthcare Connect Fund Program ("HCF"). The FCC established Telecom in 1997 to subsidize the difference between urban and rural rates for telecommunications services. Under Telecom, eligible rural health care providers can obtain rates on telecommunications services in rural areas that are reasonably comparable to rates charged for similar services in corresponding urban areas. In 2012, the FCC established HCF to promote the use of broadband services and facilitate the formation of healthcare provider consortia that include both rural and urban healthcare providers. HCF discounts an array of advanced telecommunications and information services such as Internet access, dark fiber, business data, traditional DSL, and private carriage services. These telecommunications and broadband services support telemedicine by ensuring that healthcare providers can deliver cutting-edge solutions and treatments to Americans residing in rural areas.

## **Schools and Libraries Program (E-Rate)**

The Schools and Libraries Program helps schools and libraries obtain high-speed Internet access, telecommunications services, and equipment at affordable rates ("E-Rate"). E-Rate provides a discount for the cost of broadband and telecommunications services to and within schools and libraries in order to support a modern and dynamic learning environment. Applicants and service providers submit FCC Forms (e.g. requests for services or funding) and other compliance-related documentation to the E-Rate Productivity Center ("EPC"). This electronic platform enables participation in the program. USAC frequently invests in new tools and data analytics capabilities to support the program's success in alignment with the FCC's goals.

Additional information on USF programs can be found at: About USAC

# III. TECHNICAL REQUIREMENTS

## FUNCTIONALITIES/CAPABILITIES:

Description of AIEV requirements:

USAC is soliciting information on available income-based eligibility verification solutions for the Lifeline Program and ACP. Following are some of the required functionalities/capabilities needed from the proposed solution:

i. Ability to check and verify income based on the PII and household size shared by the applicant. A household is a group of people who live together and share income and expenses, even if they are unrelated. If applicants live together and share money, they are one household. If they don't live together or don't share money, they are two or more households. Vendors may need to consider

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household size when performing income-based eligibility verification. The income thresholds for qualification change as the household size increases. USAC is interested in vendor solutions that address the fact that USAC only gathers PII for an individual, not for everyone in their household. Therefore, validating income for a household of one is one use case. Validating income for a household of two or more, with only the PII of one individual, is another use case.

- ii. USAC can provide the following five pieces of information as part of the applicant's Personally Identifiable Information (PII). The data is typically accessible via an API call allowing system-to-system data transmission.
  - First Name
  - Last Name
  - Date of Birth
  - Address
  - Last 4 digits of the social security number
- iii. Applicants meet income-based requirements if their household income is at or below 200% of the Federal Poverty Guidelines (FPG) for ACP and 135% of the FPG for Lifeline. The FPGs are updated annually, typically before the end of January each year. Therefore, the ability to adjust the qualifying income threshold based on revisions to the FPG is also desired.
- iv. Income verification results are returned in real-time/near real-time.

# Questions to be addressed by Vendors regarding the matching criteria:

- Feasibility of the applicant's income verification based on the above information?
- Difference in results received due to sharing only the last 4 digits of the social security number?
- Ability to verify the income of a household when only the PII for one individual is gathered?
- What other information would be required to perform the income verification for the applicants?
- Feasibility and process to verify that a household has no income?

USAC expects that this tool can be built or configured to operate as a Software Service that could be called from the USAC system that operates the ACP and Lifeline application processes. The tool shall also be made available so that it is secure and compatible with USAC's security requirements as follows:

- i. The system availability shall be at minimum 99.6%.
- ii. The system shall achieve a FISMA ATO based on USAC IT Security standards.
- iii. Development of the system shall use standard USAC IT Development-Security-Operations ("DevSecOps") processes, procedures, and technologies.
- iv. Core components of AIEV shall be modular with well-defined services/micro services for re-use by other applications.



## IV. RFI PROPOSED TIMELINE

Event	Date
Release RFI	May 19, 2023
Questions Due	May 25, 2023
Answers to Questions Released	May 30, 2023
Responses Due	June 8, 2023
Demos (if needed)	June 19-23, 2023

# V. RFI SUBMISSION INSTRUCTIONS

All responses to this RFI are due no later than **Thursday**, **June 8**, **2023 by 11:00 AM ET**. Responses received after this date and time may not be considered for review.

The RFI response should also include a sample workflow of how the AIEV process would work, including how USAC eligibility systems could review and further process the income-based eligibility determination of the program applicants.

Responses should be prepared simply and economically and provide a straightforward and concise explanation of the information requested. Emphasis should be on completeness and clarity.

Please submit one (1) electronic copy (PDF) of your response to USAC at <u>rfp@usac.org</u>. All submissions must include "Response to RFI LI-23-132 – Automated Income-Based Eligibility Verification" in the subject line. Please note: all electronic submissions must be limited to a maximum size of 25 GB.

## VI. RFI RESPONSE FORMAT

The response must have numbered pages and include an index or table of contents referencing the appropriate page numbers for the below sections.

#### SECTION 1 - ORGANIZATIONAL OVERVIEW

## Maximum: Three (3) Pages

Please provide a response that includes the following:

- Years of experience in developing software solutions related to Automated Income-Based Eligibility Verification, or other relevant areas
- Your company's core competencies
- What differentiates your organization and existing solutions in the market
- Number of clients you serve with similar solutions



## SECTION 2 - TECHNICAL Q&A

## Maximum: Eight (8) pages

Please provide a solution response to the associated AIEV requirements in Section III that are related to your proposed software solution and product. Solution descriptions must be concise and directly address the requirements.

#### SECTION 3 – EXPERIENCE

# Maximum: Two (2) Pages

Proposals shall provide a response that addresses the following question:

• What relevant corporate experience does the company have with developing similar software or products for a similar-sized engagement?

In addition, proposals shall provide client references demonstrating similar solutions for those organizations.

#### SECTION 4 – PRICING ESTIMATE

# Maximum: One (1) Page

(Note: Any prices provided as part of this RFI are intended solely for budgetary analysis and to establish a reasonable target budget).

Responses shall include a cost estimate for the following:

- Include an estimate for all relevant software components, such as software purchases, licenses and ongoing software support.
- Include an estimate for integration and overall project management services to lead the implementation effort, develop business processes that include recommendations on incorporating numerous processes, workflows, and requirements in an integrated platform and provide training.

# VII. VENDOR INQUIRIES AND QUESTIONS

Questions and inquiries regarding this RFI must be submitted in writing by May 25, 2023, 11:00 AM ET. Please submit all questions to USAC at <a href="mailto:rfp@usac.org">rfp@usac.org</a> and include "Questions to RFI LI-23-132 — Automated Income-Based Eligibility Verification" in the subject line.