

ATTACHMENT 2

STATEMENT OF WORK

1. INTRODUCTION

USAC is seeking a Contractor to provide Business Process Outsourcing (“BPO”) services for the Rural Health Care (“RHC”) program, which consists of the Healthcare Connect Fund (“HCF”) program and the Telecommunications (“Telecom”) program, and for the Connected Care Pilot Program (“CCPP”). Contractor must produce accurate funding determinations, while also maintaining timely and user-friendly processes to support participants in the RHC program and CCPP. Contractor must demonstrate the ability to quickly build and sustain a workforce that will become knowledgeable about USAC’s policies and procedures for administration of the RHC program and CCPP, as well as the tactical steps required to assist all program participants.

1.2 Background

USAC is the administrator for the Federal Communications Commission (“FCC” or “Commission”) with respect to the FCC’s universal service programs (also known as “support mechanisms”). The goal of the programs is to ensure that all Americans have access to robust, affordable broadband and voice services. USAC administers the Universal Service Fund (“USF”) under the oversight of the FCC, consistent with section 254 of the Communications Act of 1934, as amended, 47 U.S.C. § 254; Part 54 of the Code of Federal Regulations; orders, written directives, and other instructions promulgated by the FCC; and other laws as applicable, including government and FCC accounting requirements. As part of its duties and subject to the FCC’s rules and oversight, USAC bills contributors to the USF, collects USF contributions, and disburses universal service support payments through the following programs:

- The High Cost Program, which provides support for connectivity in rural and underserved communities;
- The Lifeline Program, which provides support to low-income consumers;
- The Rural Health Care Program, which provides support for rural health care providers;
- The Connected Care Pilot Program, which provides funding over a three-year period to support the provision of connected care services; and
- The E-rate Program, which provides support to eligible schools and libraries and consortia of eligible schools and libraries.

The subject of this RFP is the RHC program and the CCPP.

1.2.1 DESCRIPTION OF THE RHC PROGRAM AND CCPP

As administrator of the USF and universal service support mechanisms, USAC has the primary responsibility for administering the RHC Program and the CCPP. USAC, as the USF

administrator, does not set policy, but administers the RHC Program and CCPP under the oversight of the FCC and in accordance with its rules, regulations and directives, through functions performed by USAC's RHC division.

Rural Health Care Program

The RHC program, which includes the HCF and Telecom programs, provides support to eligible health care providers ("HCP"s) for telecommunications and broadband services necessary for the provision of health care, with the goal of improving the quality of health care available in rural areas. The RHC programs provides reduced rates for broadband connectivity via HCF program and telecommunications services via the Telecom program. USAC's RHC division works with HCPs and service providers across the country to support for the HCF and Telecom program goals articulated by the FCC.

The HCF program provides a 65% discount on eligible broadband connectivity expenses for eligible HCPs, which can apply for support as individual HCPs or as members of a consortium, i.e., a group of two or more health care providers. Eligible HCPs applying for support as individual entities must be allocated in rural areas, but when applying as a part of a consortium, eligible HCPs can be non-rural, as long as a majority of the consortium's sites are rural.

The Telecom program provides reduced rates to eligible rural HCPs for telecommunications and voice services necessary for the provision of health care. Telecom program ensures that rural HCPs pay no more than their urban counterparts for eligible telecommunications services. Specifically, an applicant's program support is based on the difference between rural rates charged for telecommunications services in the rural area where the HCP is located, and the rates charged for the services in urban areas in the HCP's state. The rural HCP pays only the urban rate for the telecommunications service, and the USF pays the difference between the urban rate and rural rate for the service to the service provider.

Connected Care Pilot Program

The CCPP provides funding for selected pilot projects to cover 85% of the eligible costs of broadband connectivity, certain network equipment (e.g., network equipment needed to make a support broadband service functional, such as a router), and information services necessary to provide connected care services to the intended patient population. In selecting pilot projects from eligible HCPs, the FCC has a strong preference for pilot projects that will primarily benefit low-income Americans or veterans, and is interested in directing funding towards projects that are primarily focused on addressing public health epidemics, opioid dependency, mental health conditions, high-risk pregnancy, or chronic or recurring conditions that typically require at least several months to treat. Funding these projects will help bring connected care services to rural, tribal, and other underserved areas nationwide.

1.2.2 DESCRIPTION OF RHC AND CCP APPLICATION PROCESS

HCPs apply for RHC program and CCPP funding by submitting a number of FCC forms. The forms and processes are described below. While the RHC program and the CCPP follow very similar rules and processes, each has its own set of forms.

Approximately 16,000 funding requests containing over 90,000 individual funding request lines are submitted each year.

Eligibility Determination (FCC Forms 460 and 465)

RHC program and CCPP funding is available to HCPs that are not for-profit/public and qualify as one of the eligible entity types set forth in the FCC's rules. To participate, applicants must first obtain an eligibility determination from USAC by submitting an Eligibility and Registration Form (FCC Form 460) for the HCF program or CCPP, or a Description of Services Requested & Certification Form (FCC Form 465) for the Telecom program, along with supporting documentation to verify their eligibility. Reviewers confirm that the applicant has demonstrated, through information provided on the submitted forms and supporting documentation provided that it meets all of the criteria to qualify for participation in the program. USAC's RHC division issues a decision which either confirms the HCP is eligible, or explains why it is not eligible to receive funding.

Evaluation Criteria and Request for Services (FCC Forms 461 and 465)

Unless they qualify for an exemption, participants in the RHC program and CCPP must conduct a fair and open competitive bidding process for eligible equipment or services, in accordance with all applicable program rules and requirements. That competitive bidding process starts with the applicant's submission of a Request for Services Form (FCC Form 461) to request bids for services in the HCF program or CCPP, or a Description of Services Requested & Certification Form (FCC Form 465) to request bids for services in the Telecom program. These forms describe the services requested and are posted on [USAC's website](#) for a minimum of 28 days, after which time the HCP may select a service provider. The selected service provider must be the service provider who offered the most cost effective method for providing the requested service. The RHC division reviews the forms and competitive bidding documents to verify an open and fair process was conducted in accordance with all applicable rules and requirements.

Funding Request(FCC Forms 462 and 466)

Once program participants select a service provider, they may file a Funding Request Form (FCC Form 462) to request support in the HCF program or CCPP, or a Funding Request and Certification Form (FCC Form 466) to request support in the Telecom program. The initial review of the FCC Forms 462 and 466 received by the RHC division is known as the "Funding Request Review," and includes a review of the submitted form and supporting documentation against an extensive set of program rules and requirements. Different funding requests can have varying levels of complexity and take varying amounts of time for USAC to review, depending on the type of applicant (e.g. single-site vs. multiple sites organized as a consortium) and the specific services or equipment for which support is requested. Once the Funding Request Review is complete, the funding decision is communicated to the applicant via a Funding Commitment Letter (FCL), if support is approved, or a notice of denial if support is denied.

Connection Certification and Invoicing (FCC Forms 463 and 467)

If their funding request is approved, applicants in the Telecom program file a Connection Certification (FCC Form 467) to: (1) certify that the service provider began providing the service, (2) notify USAC that the service provider has ceased to provide service that the HCP had been receiving at reduced rates as a result of its participation in this program, or (3) inform USAC that service was not, or will not be, turned on during the funding year. Once the applicant certifies that the services have started, USAC sends the applicant and service provider an HCP Support Schedule (HSS), and the service provider can begin the invoicing process. There is no FCC form for the Telecom program invoicing process.

For applicants approved for support in the CCPP or HCF Program, the Invoice and Request for Disbursement Form (FCC Form 463) is the invoice that serves as the request for the disbursement of funding for the services, equipment, and/or facilities set forth in an applicant's FCL. The filing of the Form 463 is a joint process between the applicant and the service provider. The applicant initiates the filing of the Form 463, but the vendor has the opportunity to review and revise the Form 463 before it is submitted to USAC for processing and payment.

RURAL HEALTH CARE PROGRAM

Application Process



1.2.3 RHC AND CCPP FORM REVIEW PROCESS

1.2.3.1 As the program administrator, USAC is obligated to review, validate, and adjudicate all forms received during the application process.

1.2.3.2 Form review is the process by which all the data in a submission is validated for program compliance. Forms are reviewed against an extensive set of guidelines and federal regulations that are embodied in the internal application review procedures. The rules and regulations governing universal service are located in [Title 47 of the Code of Federal Regulations, Part 54h](#) and in orders and directives issued by the FCC. This process requires reviewers to validate the information submitted on the form along with any supporting documentation against the form review procedures. In all cases, reviewers must examine the submissions, identify any items that are incomplete, incorrect, and potentially non-compliant, and engage with the applicant on the resolution of those items.

1.2.3.3 Form submission and review is managed through the RHC online portal. Form review is assisted by some business logic built into the RHC online portal, but requires significant manual effort, which includes critical thinking and decision making, communication with applicants, and referencing against internal job aids. Communication with applicants is generally done through email, but may also communicating with applicants, wither through the RHC online portal or another email tool, and also by phone, to ask further questions or request additional documentation. All electronic communications are managed and stored in USAC's IT systems. In addition, some MS Office desktop tools and applications, as well as database information, is required for the completion of the review. The RHC online portal system has multiple integrations with other IT systems within USAC to allow data from the RHC online portal to be shared across the USAC enterprise, and, as appropriate, through public-facing tools.

1.2.3.4 Different forms can have different levels of complexity and take a varying amount of time to complete. Less complex forms may not require any contact with the applicant, and can be reviewed within a few hours. Highly complex forms may contain hundreds of lines of information spanning multiple HCP entities. These forms can take days or weeks to complete, and can require considerable communication with the applicant.

1.2.3.5 Reviews can include a four (4)-level review process.

- The first level of review is conducted by an initial reviewer. This individual is the primary owner of the form, and is responsible for resolving all issues identified on the submission, documenting all correspondence and findings, and making a preliminary decision on the form.
- Next, a second reviewer with additional training and experience checks the work of the initial reviewer and, if satisfied with the work and agrees with the preliminary decision, signs-off on the decision. If any of the review is incomplete, or if the second reviewer does not agree with the preliminary decision, the form is returned to the initial reviewer for additional work.
- For the third level of review, the BPO's quality assurance team reviews the form to ensure that the initial and final reviews were done correctly.

- Finally, USAC independently selects applications for USAC quality assurance review. If any issues are found during either of the two (2) quality assurance processes, or at the final review, the application is returned to the initial reviewer for more work.

RHC Review Systems

Reviews are managed through RHC's Review Systems. RHC utilizes an online portal and other IT systems in combination with manual efforts. Communications with applicants to ask questions, or request additional documentation, are generally conducted through the RHC online portal, or MS Outlook, but sometimes are managed via phone. All electronic communications are managed and stored in USAC's IT systems and all electronic communications must be approved by USAC.

Funding Commitment Letter ("FCL"): Once the review is complete, USAC delivers an FCL to the applicant. FCLs are delivered in groups of commitments or batches weekly. Batches are run through RHC systems, and require a distinct series of checks and balances to ensure that applications are committed in compliance with program rules.

Further, the following details show additional administrative tasks associated with funding request review that are required to manage the delivery of funding decisions:

- Manage and maintain a queue of forms prioritizing for review as directed by USAC management as follows:
 - Perform reviews of individual forms against a set of documented criteria;
 - Contact program participants via phone and email to ascertain further information as needed;
 - Resolve questions and issues;
 - Review all submitted forms and documentation for potential fraud, waste, and abuse of USF funds;
 - Complete and store all documentation, record form decisions appropriately within RHC systems;
 - Alert supervisor and/or escalate form-related questions and issues to senior RHC staff
 - Track and denote work on individual and common tracking documents;
 - Implement standards and follow all documented procedures for all activities.

1.2.4 FORM REVIEW-SPECIFIC INFORMATION, *See Attachment 7 (RHC Form Template)*

1.2.4.1 FCC Forms 460, 465, and 461

Reviewers of the eligibility and request for services forms generally complete approximately 120 FCC Forms 460, or 125 FCC Forms 461, or 63 FCC Forms 465 per week, or any combination therein. Cumulative annual volume averages 4,600 forms. The review of these forms must be done expeditiously as the submission of subsequent forms depends on the outcome of these forms.

1.2.4.2 FCC Forms 462 and 466

The review of the funding request forms is the most complex and includes the review of competitive bidding, as well as all items and services for which funding has been requested. These forms are typically submitted with a large volume of supporting documentation that require examination. A reviewer is charged with identifying all portions of a funding request that require further action or inquiry. The reviewer may be able to resolve issues using documentation submitted with the form; however, most of these forms will require considerable communication with the applicant, and can take weeks to complete. All issues flagged by a reviewer require adjudication before a recommended funding decision can be sent for the next level of review. A funding request form review is not complete until it has successfully finished all levels for review, and the corresponding funding decision is queued for delivery to the applicant. Approximately 16,000 funding requests containing over 90,000 individual funding request lines are submitted each year through the RHC online portal system. The USAC RHC team delivers 34 HCF funding request decisions, per person, each week or 10 Telecom funding request decisions per person, each week, or any combination therein. This metric includes all levels of review at the vendor level.

1.2.4.3 Funding Decisions

Once the funding request review is complete, the decision is communicated to the applicant via a FCL if support is approved, or a notice of denial if support is denied. Funding request decisions are batched weekly and created and delivered through the RHC online portal. Batches require a distinct series of checks and balances to ensure that applications are committed in compliance with program rules. RHC delivers an average of 500-570 FCLs weekly.

1.2.4.4 FCC Forms 463 and 467; Invoices

All invoices and connection certifications submitted to USAC are reviewed for accuracy and for compliance with program rules. A complex set of business rules checks for program compliance, which can result in requesting additional information to resolve issues. Once the invoice reviews are complete, invoices are batched twice a month and transferred to USAC's Finance Division for disbursement. Similar to the Funding Commitment process, the authorization for payment requires a distinct series of checks and balances to ensure that invoices are compliant with program rules prior to authorizing payment.

1.3 Responsibilities and Requirements of Contractor

The primary responsibilities and requirements of Contractor are identified below:

- 1.3.1** Contractor and its reviewers, staff and employees working on the USAC account shall be located within the United States.
- 1.3.2** Contractor shall provide all hardware for successful completion of tasks associated with this engagement.
- 1.3.3** Contractor shall operate its facility in accordance with all federal and state laws and regulations, to include compliance with any accessibility-related requirements (e.g., Section 508 compliance) and with the Electronic Communications Privacy Act and other similar state wiretapping laws (e.g., for recording customer support calls).

- 1.3.4** Contractor shall forecast demand and keep strong workforce management principles to maintain adequate staffing and meet performance standards described in this RFP.
- 1.3.5** Contractor will use USAC's RHC online portal and other IT systems, to conduct the reviews. However, Contractor may suggest additional tool(s) that could be used to supplement existing tools that would drive efficiencies.
- 1.3.6** Contractor shall ensure that the reviews team is available to program participants during regular business hours of 8am – 8pm ET ("Business Hours"), extended hours may be required during Window close.
- 1.3.7** Contractor shall ensure that a supervisor is available during Business Hours to handle escalation, and that program participants will always be transferred to a [contractor] manager upon request.
- 1.3.8** Contractor shall be responsible for all work performed by any subcontractors.
- 1.3.9** Contractor shall ensure resolution of all applicant issues arising from contractor-reviewed forms.
- 1.3.10** Contractor shall provide the following functions, including but not limited to:
 - 1.3.10.1 Utilization of various technologies provided by USAC including Citrix
 - 1.3.10.2 Initiating and Responding to requests for information, escalating to USAC representatives as agreed upon with USAC; and
 - 1.3.10.3 Entering data into the USAC systems and databases.
 - 1.3.10.4 Contractor shall work with USAC to develop an ongoing training and staff development program for all reviewers and managers.
 - 1.3.10.5 Contractor shall dedicate at least one (1) staff member to develop performance metrics and provide regular insights and reporting on those metrics.
 - 1.3.10.6 Reviewers Skills Set (See Attachment – APA Job Description)

2 SERVICES TO BE PERFORMED

2.1 Application Processing

Contractor shall provide BPO services for the RHC program and CCPP. This Contract is for funding request processing work conducted for Funding Year 2022. USAC's RHC division processes approximately 16,000 such forms annually, manages toward an annual cap of approximately \$600 million, and provides funding for the expansion of telecommunications and broadband access to rural communities and health care facilities.

USAC will assign the majority (approximately 90 percent of HCF and 60 percent of Telecom applications) of RHC program applications to Contractor to be completed during the Contract period of performance. Each funding request contains a variable number of lines, each of which requires review and adjudication. The current RHC team delivers 34 HCF funding request decisions, per person, each week, and 10 Telecom funding request decisions per person, each week.

Contractor shall also provide communications and support during the Contract Term. This includes ensuring direct one-on-one communication between USAC stakeholders and Junior / Senior Processing Specialists, ensuring that USAC RHC team is informed, as needed, throughout each processing step. It also includes a higher touch support model following forms review for a to-be-determined time period to quickly assess and address any forms processing issues during the processing window.

2.1.1 Task 1 – Funding Request Review FCC Forms 462 and 466

Activity 3 requires review of requests for funding (FCC Form 462 or FCC Form 466) submitted during the funding year application filing window for compliance with program rules and requirements. The request for funding describes the service(s) selected, the cost, and the duration of services. Based on the review, the RHC team will issue a funding decision delivered to the applicant, which either denies support or describes the amount of funds approved for the eligible equipment or services.

2.1.2 Task 2 – Reporting

On a daily basis, Contractor shall meet with USAC RHC staff to report on progress and percentage of completion for forms processing for each activity and task identified in the Contract, and to collaborate on deliverables planning to ensure 100% accuracy of forms processing. Form processing demonstrations may require by the contractor in the event of noncompliance with SLAs. See reporting requirements below.

2.1.3 Task 3 – Technical Status Meetings

Contractor’s project manager shall convene a weekly “Technical Status Meeting” with the Technical Point of Contacts (“TPOC”s) and other vital USAC stakeholders. The purpose of this weekly Technical Status Meeting is to ensure all stakeholders are informed of Contract activities, provide opportunities to identify other activities and establish priorities, and coordinate resolution of identified problems or opportunities. Contractor shall make available draft copies of design documentation to demonstrate iterative progress for USAC to track final deliverables. Contractor’s project manager shall provide USAC with an agenda for the Technical Status Meeting at least one day in advance of the meeting, and also provide minutes of these meetings, including attendance, issues discussed, decisions made, and action items assigned, to the TPOCs within two workdays following the meeting.

2.1.4 Task 4 – Project Management Plan (“PMP”)

Contractor shall document all Contract support requirements in a PMP. The PMP shall:

- a) Describe the proposed project management approach

- b) Include milestones, tasks, and subtasks required in this Contract, as required
- c) Provide for an overall Work Breakdown Structure (“WBS”), WBS dictionary, project schedule, level of effort, and describe associated responsibilities and partnerships between USAC organizations and stakeholders, as required
- d) Include Contractor’s Quality Management Plan (“QMP”) to include any Service Level Agreements (“SLA”s) and SLA monitoring and reporting methods
- e) Risk management and risk mitigation procedures and lines of authority

The Contractor shall provide USAC with a draft PMP at the project kick-off meeting on which USAC will make comments, and a revised PMP should be delivered by ten (10) working days after the kick-off meeting.

The PMP is an evolutionary document that shall be updated when there are changes that affect cost, schedule, and scope.

2.1.5 Task 5 – Optional Services

USAC may require additional support as it becomes familiar with the new processes and finalizes operational activities. This work shall be deemed Optional Services and shall be billed on a variable labor hour basis per CLIN 03 (**See RFP**). USAC and Contractor will negotiate terms of optional services when the determination for such services is required.

2.2 Quality Assurance

The primary quality control and assurance standards that apply to Contractor are identified below:

- 2.2.1** Ensure that all review processes are subject to quality assurance unless specifically exempted in the approved procedures.
- 2.2.2** Contractor line supervisors or quality control staff shall be located on site with the majority of reviewers to conduct quality control measures, including monitoring operational day-to-day service delivery, monitoring performance, escalating problems for resolution, and maintaining technical support relationships.
- 2.2.3** Contractor shall perform the following quality control measures:
 - 2.2.3.1.1 Provide a point of contact for weekly meetings on reporting management;
 - 2.2.3.1.2 Support audit requirements requested by USAC;
 - 2.2.3.1.3 Provide visibility to USAC regarding volumes of reviews by function etc.;
 - 2.2.3.1.4 Outline the process of dispositioning contacts and audits to assess dispositioning quality of reviewers;
 - 2.2.3.1.5 Provide audit remediation research and resolution and other related support as required;
 - 2.2.3.1.5.1 Identify problems that may arise and propose solutions; and
 - 2.2.3.1.5.2 Monitor and manage efforts to remedy a failure of performance.
 - 2.2.3.1.6 Quality audit results shall meet or exceed criteria set by USAC and provided to Contractor. Quality should focus on reviewer behaviors, accuracy of the reviews decisions, and adherence to the approved procedures.
 - 2.2.3.1.7 Contractor shall facilitate and allow USAC access to Contractor screen data displaying real time contact activities (e.g., all volumes, number of reviews by function, number

of reviews complete by level and type, application review forecasts, available staff, etc.). The screen display will be available for remote use by USAC.

2.2.3.1.8 Contractor will provide continuous quality assurance and quality improvement through:

2.2.3.1.8.1 Identification and application of best practices from its other operations; and

2.2.3.1.8.2 Implementation of concrete programs, practices, and measures designed to ensure, at a minimum, that the services are performed in accordance with the agreement and to improve service levels.

2.2.3.1.9 Contractor shall develop and implement a Quality Assurance Surveillance Plan (“QASP”) to be mutually agreed on by USAC at Contract signing, to be revised as requested by USAC. The QASP shall include metrics and performance standards that measure the quality of Contractor's performance and compliance with Contract obligations.

2.2.3.1.9.1 Standards to include in the QASP – This applies to the period after the Ramp Up.

2.2.3.1.9.2 Contract Proficiency and Quality Assurance Reviews

Contractor Proficiency will be determined as follows:

Contractor will begin processing and performing Quality Assurance Reviews on 100% of the FY2021 forms if, and until, adjustments are approved as described below. The cumulative number and percentage of returns will be reported to USAC weekly as provided for in Section 1.13.4. Proficiency of the Contractor will be measured weekly based on the cumulative number and percentage of forms returned from USAC quality assurance reviews (“QA Reviews”).

Percentage of Quality Assurance Reviews to be Performed by Contractor:

Contractor will perform Quality Assurance Reviews of 100% of forms until the rate of returns from USAC Quality Assurance Reviews falls below 20.00%. If the rate of return falls below 20.00%, Contractor may reduce its sample size to no less than 60.00%, based on a sample size that targets reviewers who do not demonstrate proficiency in addition to forms containing items tied to top quality issues. Contractor will document the outcome of the quality assurance review of each application, to include the reviewer, the issues found, and the resolution and report the results to USAC on a weekly or otherwise agreed upon basis.

If the rate of returns from USAC Quality Assurance Reviews falls below 10.00%, the Contractor may reduce its sample size, as approved in writing by USAC, and choose to perform Quality Assurance Reviews based on a sample size that targets reviewers who do not demonstrate proficiency in addition to forms containing items tied to top quality issues. If Contractor reduces the sample size below 100% and if USAC performs Quality Assurance Reviews and determines Contractor is not meeting the 100% proficiency standard, Contractor will be required to increase its sample size by a measure agreed upon with USAC. USAC is the final arbiter regarding appropriate percentages of review. The intention of this requirement is to ensure proficiency level is monitored on an ongoing basis and adjusted to target 100% accuracy.

Target for Returns Based on USAC Quality Assurance Reviews:

Contractor will target a less than or equal to 20.00% return rate for the Ramp Up Period of 45 days and a less than or equal to 10.00% return rate for the period following the Ramp Up. A service level credit will apply to forms processed after the Ramp Up Period, where the targets are not met as described in Section 5.3.2.

Percentage and Timing of Quality Assurance Reviews to be Performed by Contractor:

At its discretion, USAC will continue to perform 100% Quality Assurance Reviews of all forms processed by Contractor to determine if the Contractor demonstrates 100% proficiency. At which point USAC determines it is no longer necessary for it to perform 100% Quality Assurance Review, it will reduce its sample size. If ongoing reviews indicate a need for an increased sample size, USAC will adjust its sample size. If during its reviews, USAC determines an error is consistently being made, Contractor will have the opportunity to review forms that are in USAC's Quality Assurance queue for the error and resubmit for USAC QA without penalty or being deemed as a return. If consistent or systemic errors are identified, USAC reserves the right to return forms (on a program-specific basis) in a sample that have not been reviewed by USAC if it determines that the forms reviewed show sufficient error to warrant the return of the entire program-specific sample. USAC shall identify the specific error(s) requiring correction by Contractor.

USAC will make its best effort to complete Quality Assurance Reviews within two weeks (10 business days) of submission of each form to USAC. USAC will maintain a spreadsheet reporting the types of errors identified and details of each return will be added to the spreadsheet to include the (1) category of the issue (2) detailed reason and (3) the reference to the relevant procedure, guidance, or training material as soon as the review is complete. The spreadsheet will be presented during the weekly Operational Board Meetings. If USAC is unable to finish its Quality Assurance Review within the two week time period, the form will not be subject to a service level credit. However the Contractor will be required to make the corrections and resubmit the form for a secondary Contractor Quality Assurance Review. Any instances where USAC is unable to meet the two week turnaround on Quality Assurance Reviews, will be escalated to the Strategic Board for discussion about any necessary contractual adjustments.

If the Contractor does not believe a form should have been returned, it must be disputed within two weeks of the return. The reason must be documented in detail in the QA Return Proficiency Report, noting the relevant procedure, guidance, or training material. The return reasons will be reviewed during the weekly Operational Board Meetings and any disputes not resolved by the following Operational Board meetings, will be escalated to the Strategic Board for resolution.

USAC will be the final arbiter of the validity of a returned form.

2.3 Vendor Governance

2.3.1 USAC intends to govern Contractor primarily through two key committees: the Strategic Board and the Operational Board.

- 2.3.2** The Strategic Board will provide executive-level governance of USAC's relationship with Contractor, and will have the following characteristics:
- 2.3.2.1.1** The Strategic Board will be chaired by the Vice President of RHC (USAC) and other members will include various USAC RHC Directors and certain Key Personnel (Contractor), and other participants as required (e.g., program staff and project managers).
 - 2.3.2.1.2** The Strategic Board will meet monthly for six (6) months, beginning at execution of the Contract, and every three (3) months thereafter (or on the request of any member, subject to approval by the Chairperson).
 - 2.3.2.1.3** The Strategic Board will have the following functions:
 - 2.3.2.1.3.1** Review status and performance of the agreement.
 - 2.3.2.1.3.2** Discuss and define new strategies.
 - 2.3.2.1.3.3** Provide executive governance; conduct high level monitoring of project goals, Key Performance Indicators (“KPI”s), and service levels.
 - 2.3.2.1.3.4** Make decisions on gain sharing and contractual adjustments / amendments (SLAs, KPIs), including the expectation that SLAs and/or KPIs may be adjusted to match process improvements annually.
 - 2.3.2.1.3.5** Consider and resolve issues elevated by the Operational Board.
 - 2.3.2.1.3.6** Contractor should expect to conduct quarterly Strategic Board with USAC leadership to review performance, discuss process improvement and share outlook for upcoming quarter performance. Such meetings may occur more frequently, especially at the beginning of the Contract, and are at USAC’s discretion.
 - 2.3.2.1.4** The Operational Board will provide operational governance of USAC's relationship with Contractor, and will have the following characteristics:
 - 2.3.2.1.4.1** The Operational board will be chaired by the RHC Director of Operations (USAC). Other required members will be Contractor’s Key Personnel as well as other USAC RHCstaff.
 - 2.3.2.1.4.2** The Operational Board will meet weekly beginning at the start of the Contract.
 - 2.3.2.1.5** The Operational Board will have the following functions:
 - 2.3.2.1.5.1** Contractor shall schedule and prepare an agenda and coordinate weekly meetings with USAC governance body (likely containing Executive leadership and RHC representatives). Meetings should include project and forms processing status updates, a summary of challenges experienced by Contractor in performing its duties, including alternative strategies for accomplishing its tasks, as appropriate
 - 2.3.2.1.5.2** Monitor operations and measure performance based on key reports, KPIs, SLAs, workload consumption plan (actual vs. plan), etc.
 - 2.3.2.1.5.3** Analyze critical issues/problems; escalate to the Strategic Board as appropriate.
 - 2.3.2.1.5.4** Ensure quality output/processes and problem solve as required.
 - 2.3.2.1.5.5** Ensure compliance with USAC standards and requirements, including review of business rules for acceptable eligibility documents.
 - 2.3.2.1.5.6** Discuss and resolve issues brought by the Project Manager / Problem Manager.
 - 2.3.2.1.6** USAC intends to hold weekly meetings with Contractor during the ramp-up phase.
 - 2.3.2.1.6.1** Weekly meetings will include the Vice President of USAC’s RHCdivision, USAC RHC Directors, and other members will be the Project Director (Contractor),

Operational Manager (Contractor), Training / QA Manager (Contractor), Information Technology Manager (Contractor), and other participants as required (e.g., USAC Rural Healthcare staff, additional Contractor staff).

2.3.2.1.6.2 Meetings during the ramp-up will focus on the following functions

2.3.2.1.6.3 Monitor set up of BPO work site, including staffing, and activities to transition from prior BPO (if needed).

2.3.2.1.6.4 Ensure smooth integration of all platforms

2.3.2.1.6.5 Ensure quality set-up of work site and problem solve as required

2.3.2.1.6.6 Ensure compliance with USAC standards and requirements.

2.3.2.1.6.7 Oversee initial trainings of identified Trainers.

2.4 Continuous Improvement Standards

The primary continuous improvement (CI) responsibilities and requirements of Contractor are identified below.

2.4.1 Contractor shall stand up a CI team with clear governance for the entire CI process, as agreed to by USAC, applicable to Task 2 and 3 only.

2.4.2 Contractor shall define and quantify expected and measurable quality and efficiency benefits of improvement initiatives, applicable to Task 1 and 3 only.

2.4.3 Contractor shall set up regular monthly meetings to review the improvement initiatives and their measurable impact, applicable to Task 1 and 3 only.

2.5 Transition Plan

2.5.1 Contractor must include in its proposal a comprehensive plan to transition operations of functions from USAC, which should include the following topics:

2.5.1.1 Risk analysis and proposed solution(s) and/or mitigation strategy(ies), including an assessment for the transition.

2.5.1.2 Staffing.

2.5.1.3 Hardware and software tools, including platforms utilized.

2.5.1.4 End-to-end performance testing (test period to begin during the transition period), which shall assess the complete business process including, at a minimum:

2.5.1.4.1 Testing with existing system applications and services as appropriate;

2.5.1.4.2 Validating of system set-up for transactions and user access;

2.5.1.4.3 Confirming use of system in performing business processes;

2.5.1.4.4 Verifying performance of business critical functions;

2.5.1.4.5 Confirming integrity of business process, data, services security, and end product;

2.5.1.4.6 Verifying all requirements of the Contract have been met;

2.5.1.4.7 Identifying performance speed; and

2.5.1.4.8 Identifying error and/or failure rate(s).

2.5.1.5 Contractor also must provide a ramp down plan for the end of the awarded Contract term. This plan shall document and demonstrate how the services and operations provided to USAC by Contractor will be transferred to USAC or to another vendor, if USAC chooses

not to renew the relationship with Contractor. The plan shall include, but not be limited to, knowledge transfer, training, and technical support for the handover.

2.6 Training

- 2.6.1** All training costs, except those specifically identified as otherwise, are the responsibility of Contractor. USAC will not accept any separate invoicing for training and/or associated expenses. Training will likely occur every fund year as reviewers change and FCC approved procedure are updated for the respective fund year.
- 2.6.2** Contractor shall provide steady state service to include planning, preparation and delivery of training for RHC forms processing and BPO services training delivery to support goals for workforce oversight and real-time form status. Contractor shall:
 - 2.6.2.1** Deliver, maintain and update Contractor training, ongoing/refresher training, and processing training; and
 - 2.6.2.2** Develop, distribute, and update training reference materials (e.g., desk reference, “handy” guide, Frequently Asked Questions (“FAQ”s), etc.) and delivery media.
- 2.6.3** USAC will provide initial training to include trainers, supervisors, and reviewers, including onsite (or remote) meetings and train-the-trainer activities, resources and support as needed. This training will start at the beginning of the onboarding period unless otherwise determined by mutual agreement of USAC and Contractor. The training activities should not exceed more than 40 hours to occur within a 30 day period, to include train-the-trainer and BPO staff. USAC will provide supplemental training for each Option Term that USAC exercises to cover any FCC updates.
- 2.6.4** Examples of when additional training might be required include
 - 2.6.4.1** If the rules of the program change for any reason;
 - 2.6.4.2** Annual procedures updates;
 - 2.6.4.3** System training; and/or
 - 2.6.4.4** If a one-time event occurs that requires special training to handle properly.
- 2.6.5** Contractor’s supervisors/trainers shall work with USAC staff to review Contractor-created training manual. USAC will approve all training materials.
- 2.6.6** Contractor shall train and manage review staff as follows:
 - 2.6.6.1** Contractor shall develop, conduct and maintain a comprehensive and continuous training program providing trainers and staff with the appropriate knowledge and current information to perform services required by USAC.
 - 2.6.6.2** Contractor shall ensure that all staff are trained in applicable policies, procedures and operations.
 - 2.6.6.3** Contractor shall develop and update training manuals and training records for USAC review and approval.
 - 2.6.6.4** Contractor shall implement a procedure for ongoing refresher training, updated for retraining of information as needed.

2.6.6.5 Contractor shall have a dedicated trainer onsite to conduct training that will be monitored by USAC.

2.6.6.6 Contractor shall conduct a Security, Safety and Conduct training that will include, but not be limited to:

2.6.6.6.1 Compliance training, to include accessibility / 508 compliance, privacy and information security;

2.6.6.6.2 Sensitivity awareness;

2.6.6.6.3 Projecting a positive and helpful attitude;

2.6.6.6.4 Communicating with confidence and competence;

2.6.6.6.5 Adhering to confidentiality policies and procedures;

2.6.6.6.6 Customer service soft skills; and

2.6.6.6.7 Data and security training.

2.6.6.7 Contractor shall conduct program rules training that will include, but not be limited to program rules, as they pertain to the application and funding process.

2.6.6.8 Contractor shall provide manual review training that will include, but not be limited to;

2.6.6.8.1 RHC's procedures (which will be provided by USAC to the Contractor);

2.6.6.8.2 Standards of review for specific documents; and

2.6.6.8.3 Signs of waste, fraud, and abuse (e.g., to enable reviewers to recognize and report potential fraud).

2.6.6.9 USAC shall update the managers/trainers on an as-needed basis with respect to policy updates. USAC may also support provision of current reference materials and updates as needed.

2.6.6.9.1 Any training of Contractor managers /trainers required for new projects or new subject matter throughout the term of the Contract shall be at the cost and responsibility of Contractor.

2.6.6.9.2 Whenever new projects are introduced, USAC and Contractor managers / trainers shall evaluate the quality standards and time required to train staff.

2.6.6.9.3 Training can be formal in a classroom setting, video conferencing or on-the-job training as mutually agreed to by USAC and Contractor.

3. DELIVERABLES AND REPORTING OBLIGATIONS

The following Contractor Deliverables and duties will be identified in the executed contract:

3.1 Contractor shall provide leadership staff to participate in meetings via conference call with USAC staff, to be held as required, in order to discuss business trends, issues, or any other pertinent information.

3.2 Contractor shall be capable of generating customized reports.

3.2.1 Contractor shall generate reports as required by USAC, whether on a regular or one-time basis.

3.2.2 Contractor's reporting software, if approved by USAC, must permit real-time access to all the system's data.

3.3 Contractor shall also provide USAC with access to transaction and performance data at USAC's discretion in an open, standard format, such that USAC can perform its own data analytics.

3.4 Reports shall include, at a minimum, the SLAs and quality metrics in **Attachment 4 (SLA Template)** and progress and updates on executing the Transition Plan.

3.5 Contractor shall also provide USAC with the required FISMA reports and updates.