

# NATIONAL VERIFIER ANNUAL REPORT AND DATA

SUBMISSION DATE: JANUARY 30, 2026

## I. BACKGROUND

In March 2016, the Federal Communications Commission (FCC) adopted the Lifeline Reform and Modernization Order (*2016 Lifeline Order*), which included changes to eligibility verification for enrollment and recertification.<sup>1</sup> Prior to the *2016 Lifeline Order*, eligible telecommunications carriers (ETCs) or state administrators were responsible for verifying the eligibility of potential households. The FCC recognized that this structure was complex, burdensome, and had the potential for waste, fraud, and abuse. With the adoption of the *2016 Lifeline Order*, the FCC directed the Universal Service Administrative Company (USAC) to establish a system for independent, third-party eligibility determinations. To accomplish this, USAC built the National Lifeline Eligibility Verifier (National Verifier) to automate, where possible, and standardize eligibility verification across all states and territories.

USAC deployed the National Verifier in groups of states and territories on a rolling basis beginning in June 2018. By December 2020, the National Verifier had fully launched in all states, territories, and the District of Columbia. In addition to Lifeline, the National Verifier has been used to administer the Emergency Broadband Benefit (EBB) Program in 2021 and the Affordable Connectivity Program (ACP), which replaced the EBB Program at the end of 2021 and ran through June 1, 2024.

In 2025, the National Verifier received and made eligibility decisions on 15 million Lifeline applications.

This annual report provides a summary of the National Verifier and its functionality, and it outlines how the National Verifier meets the FCC's key objectives: to protect against waste, fraud, and abuse; to lower costs to the Universal Service Fund (Fund) and service providers through administrative efficiencies; and to better serve eligible beneficiaries by facilitating choice and improving the enrollment experience. This report also provides an update on the use and performance of the National Verifier, including a discussion of system enhancements.

## II. NATIONAL VERIFIER OVERVIEW

The National Verifier prioritizes automation, with most eligibility decisions made using connections to state and federal databases and without human review of eligibility documentation. Automated eligibility decisions are made swiftly, at a lower administrative cost, and with the highest level of program integrity by using source data from our state and federal partners.

In 2025, USAC partnered with officials to leverage 26 state & territory database connections, providing an automated check for participation in the Supplemental Nutrition Assistance Program

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<sup>1</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) (*2016 Lifeline Order*).

(SNAP) in each of those states, as well as checks of Medicaid and Supplemental Security Income, where available. USAC and the FCC continue to work with states to achieve additional database connections. See the Appendix for more information.

The National Verifier also has database connections with three federal agencies. In 2018, USAC built a connection to the U.S. Department of Housing and Urban Development (HUD), providing real-time participation results for qualifying Federal Public Housing Authority (FPHA) programs in all 50 states, the District of Columbia, and U.S. territories. USAC expanded this capability in 2023 by connecting to an additional HUD database to further confirm FPHA participation. In 2019, USAC implemented a similar real-time connection to the Centers for Medicare and Medicaid Services (CMS), providing a check of Medicaid participation in all 50 states, the District of Columbia, and in the territories of Puerto Rico and the U.S. Virgin Islands. The CMS connection has the largest impact of any single connection, accounting for 56% of all automated eligibility passes in 2025. In 2022, USAC implemented an automated database connection with the U.S. Department of Veterans Affairs to verify participation in qualifying Veterans Pension and Survivors Benefit programs. USAC continues to work towards identifying and achieving additional federal database connections.

The National Verifier is more than just a collection of state and federal database checks, however. It is a complex system of technical and operational processes that are designed to achieve the highest level of program integrity while reducing burden and confusion for ETCs and consumers. Aside from automated checks for program eligibility, the National Verifier has Application Programming Interface (API) connections with the United States Postal Service's Address Matching Service, a Third-Party Identity Verification service, and geolocation services. The National Verifier also utilizes Business Process Outsourcers (BPOs) to conduct manual reviews, to help with customer service, and to receive and send mail. USAC works very closely with these partners to ensure quality standards are met in all areas.

The National Verifier is a benefit for both program consumers and service providers. Throughout the development and continuous improvement of the National Verifier, USAC communicates with stakeholders and incorporates feedback to provide a better user experience. See Section IV for an overview of the enhancements USAC has made to the National Verifier in 2025 in response to consumer and stakeholder feedback.

### **III. DESCRIPTION OF NATIONAL VERIFIER PROCESSES**

The key processes that the National Verifier supports—application, recertification, continued eligibility checks, enrollment & claims, and opt-out state processes—are summarized below.

#### **APPLICATION**

The purpose of the application process is to determine whether an individual is eligible for Lifeline benefits. Applicants can enroll via the National Verifier consumer portal, receive help from a service provider using the National Verifier service provider portal, or mail the application to the specific program support center. Applicants can also apply through service providers that have access to the National Verifier through the eligibility check API. Applications are validated through available automated eligibility data sources and undergo checks to confirm identity, validate address, confirm one-per-household

compliance, and verify that the consumer is not already enrolled in the program. If an individual's eligibility cannot be validated automatically, they can upload supporting documentation to the National Verifier portal or mail it to the program support center. Submitted documentation undergoes a manual review. Upon completion of the application, the consumer is either deemed qualified for the program benefit or is required to submit more information. Qualified individuals can contact a service provider in their area to enroll in the program.

### RECERTIFICATION

Households must annually certify that they are still eligible for the Lifeline program to continue to participate. During recertification, households are checked against available automated eligibility data sources. If a household's eligibility cannot be validated, they are prompted to recertify in the National Verifier consumer portal, on the phone via an interactive voice response, or via mail. Some households are required to submit eligibility documentation while others may self-certify their eligibility. If the household does not recertify within the 60-day recertification window, they will be de-enrolled and lose their program benefit.

### CONTINUED ELIGIBILITY CHECKS

When USAC has reason to believe that a consumer may no longer be eligible for Lifeline, the consumer may undergo a Continued Eligibility check. Continued Eligibility checks are similar to applications except they are initiated by USAC, not by the consumer. Consumers have 30 days to demonstrate their eligibility, which may require the submission and review of documentation. If they are not found eligible and their Continued Eligibility check fails, the consumer is de-enrolled from Lifeline.

### ENROLLMENT & CLAIMS

The National Lifeline Accountability Database (NLAD) houses the enrollment information of all consumers in Lifeline and prevents duplicate enrollments of a single consumer or household. NLAD existed prior to the National Verifier but was integrated with the National Verifier.

When an ETC attempts to enroll a consumer in NLAD, NLAD matches the consumer's information against application data in the National Verifier. NLAD will only allow the consumer's enrollment if the system identifies a current, qualified application for the consumer in the National Verifier and if there are no duplicates found within NLAD already.

The Lifeline Claims System (LCS) within NLAD manages claim activity. NLAD takes a snapshot of all current subscribers on the first of each month, and NLAD opt-out states each send a monthly snapshot of their subscribers to USAC each month, which USAC uploads to LCS. The snapshots of every ETC's subscribers are the basis for monthly claims. All ETCs in all states, territories, and the District of Columbia use the LCS to submit claims for reimbursement for federal Lifeline support.

### OPT-OUT STATE PROCESSES

California, Oregon, and Texas have managed eligibility verification and duplicate checking

for the federal Lifeline program for several years. Pursuant to the process adopted in the *2012 Lifeline Order*,<sup>2</sup> ETCs in these states largely do not enroll their Lifeline households in NLAD. Due to the unique circumstances in these states, the National Verifier launched in these states using a modified approach. At the time of the *2012 Lifeline Order* the FCC determined that it was appropriate to continue relying on the existing functions of certain states, which include application determinations and enrollment tracking. On November 20, 2025, the Wireline Competition Bureau of the FCC issued an Order announcing that starting on February 1, 2026, the National Verifier and related federal processes will determine eligibility and perform duplicate checks for all consumers in California, and Lifeline service providers will use the National Lifeline Accountability Database (NLAD) to enroll eligible California consumers.<sup>3</sup>

#### IV. NATIONAL VERIFIER MEETS 2016 LIFELINE ORDER OBJECTIVES

The three objectives for the National Verifier in the *2016 Lifeline Order* are to: (1) protect against waste, fraud, and abuse; (2) lower costs to the Fund and ETCs through administrative efficiencies; and (3) better serve eligible beneficiaries by facilitating choice and improving the enrollment experience.<sup>4</sup> These goals are being met through the design of the National Verifier system and the administration of related processes.

One of the key features of the National Verifier that furthers all three objectives is automated access to eligibility data sources. USAC has built direct, automated connections to eligibility data sources that are managed by the state and federal agencies that administer the relevant qualifying programs. Automation reduces the need for manual reviews, which are more expensive administratively, increase the burden to service providers and consumers, and can be subject to human error or manipulation. In 2025, the National Verifier used its automated eligibility database connections to confirm the program eligibility for the majority of applicants who qualified for Lifeline.

As mentioned above, the National Verifier leverages automated connections with 26 states and territories, along with three federal connections. Though some connections existed prior to the National Verifier, those connections were limited to certain ETCs in certain states. In addition, the National Verifier's number and quality of connections greatly exceeds what was available previously, especially when considering the National Verifier's nationwide connection for Medicaid which has made the biggest impact in maximizing automation in the National Verifier.

USAC is continuously working to increase access to state and federal data sources. In addition to automated access to eligibility data sources, the objectives of the *2016 Lifeline Order* are further met through the design of the National Verifier systems and processes, as described below.

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<sup>2</sup> *Lifeline and Link Up Reform and Modernization et al.*, WC Docket Nos. 11-42 et al., Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656, 6752, para. 221 (2012) (*2012 Lifeline Order*).

<sup>3</sup> See *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Order, DA 25-965 (WCB Nov. 20, 2025).

<sup>4</sup> See *2016 Lifeline Order*, 31 FCC Rcd at 4007, para. 128.

### *i. Protect Against Waste, Fraud, and Abuse*

The National Verifier was designed to address one of the key program integrity concerns in Lifeline: relying on ETCs to determine household eligibility. For service providers, ensuring compliance with Lifeline household eligibility rules and obtaining/maintaining their customer base are goals that could be, or could be perceived to be, at odds with one another. Hence, creating an independent administrator with a centralized system to conduct eligibility determinations helps to mitigate this conflict of interest. Since its initial launch in June 2018, the National Verifier has continuously improved USAC's capabilities to prevent fraud, waste, and abuse as identified in audits and investigations performed by the Government Accountability Office and FCC Inspector General. USAC, as a neutral administrator, now has visibility into each Lifeline application submitted to the National Verifier, including those where automated checks are not able to verify eligibility, and has visibility into all supporting documents submitted to the National Verifier that are relied upon for an applicant to qualify for the program. While USAC conducts the eligibility verification process, service providers are still responsible for ensuring their compliance with all program rules.

In 2017, the FCC directed USAC to create the Representative Accountability Database (RAD) as an additional mechanism to guard against waste, fraud, and abuse.<sup>5</sup> RAD is a registration system that validates the identities of enrollment representatives performing transactions in USAC systems, including the National Verifier and NLAD. As of May 25, 2020, all enrollment representatives are required to obtain a Representative ID to perform Lifeline transactions. USAC regularly monitors activity and has authority to lock representative accounts in instances of suspicious activity and/or misuse of the National Verifier and other USAC systems.

### *ii. Lower costs to the Fund and ETCs through administrative efficiencies*

Centralizing the application process under an independent, third party reduces the overall cost to administer the Lifeline program. For Lifeline, the single, streamlined National Verifier process is very efficient compared to a patchwork process where each ETC develops and follows its own unique approach. In addition, the National Verifier has achieved greater automation than ETCs had previously. Prior to the National Verifier, ETCs in approximately 20 states benefited from automated connections or processes made available by states for eligibility verification. The National Verifier fills that gap for all ETCs in all states, as it has automated connections to nationwide data sources. In addition, the National Verifier has connections in additional states where ETCs did not previously benefit from automated connections.

The automation in the National Verifier reduces burdensome and complex manual reviews and decreases the likelihood of improper payments. Before the National Verifier, such manual reviews were the responsibility of ETCs, each with their own review process. In the National Verifier, manual reviews are completed uniformly by the Lifeline Support Center, with USAC providing close guidance and training.

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<sup>5</sup> See Letter from Ajit V. Pai, Chairman, FCC, to Vickie Robinson, Acting Chief Executive Officer and General Counsel, USAC (July 11, 2017).

### *iii. Facilitate choice and improve the enrollment experience*

The National Verifier has a dedicated consumer portal where consumers can apply for Lifeline without needing to apply through a service provider. It provides a standardized application process for all households, no matter where they live or what service provider they ultimately choose. Upon qualification in the National Verifier consumer portal, the consumer is directed to a list of service providers located in their area, ensuring that they know their options and can pursue service from the provider they prefer.

For consumers who wish to apply with assistance from their service provider, there are two options: the National Verifier service provider portal and the eligibility check API. The API can be integrated within a provider's own website or online enrollment platform. Not all service providers utilize the eligibility check API, but all providers have access to the service provider portal. Using the service provider portal, a provider can help a consumer apply with an interview-style approach (the service provider's agent must be present with the consumer). The eligibility check API allows a consumer to apply through a service provider's website, if the provider uses this option, and it will route the consumer directly to the National Verifier to complete the required certifications. USAC deployed the eligibility check API in December 2019 in response to requests from service providers for more automated tools with which to interact with the National Verifier. Several Lifeline service providers have been authorized to access the API. Almost 12 million Lifeline applications were submitted through the eligibility check API in 2025, making up 77% of all Lifeline applications.

Consumers may also submit applications through the mail, due to potentially limited internet access among the eligible population. Lastly, Lifeline consumers have the option to apply with assistance from state agencies and Tribal partners.

Each of the opt-out states offers a streamlined eligibility process that includes an automated state database eligibility check and duplicate check. Consumers in these states follow a single process to apply for both the federal Lifeline benefit and state benefits.

USAC has continued implementing enhancements to the National Verifier in 2025 to improve user experience across several systems, including the Lifeline online application. Comprehensive application instructions were released in English and nine additional languages to guide consumers effectively through the application process. In December 2025, USAC completed the migration of the National Verifier to USAC Amazon Web Services cloud. This milestone supports long-term program stability, performance, and operational efficiency.

Lifeline program rules were temporarily waived for consumers impacted by Helene Weather Events and Hurricane Milton, starting in October 2024. Impacted consumers receiving assistance from the Federal Emergency Management Agency's (FEMA) Individuals and Households Program (IHP) were able to enroll using this waiver, and de-enrollment requirements tied to the existing Lifeline eligibility standards for those households were temporarily waived until April 2, 2025 and April 10, 2025, respectively.<sup>6</sup> In January 2025, the FCC also temporarily waived the

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<sup>6</sup> *Lifeline and Link Up Reform*, WC Docket No. 11-42, Order, 39 FCC Rcd 11274 (2024), at 4–5, paras. 6–7; *Lifeline*

annual recertification requirements and de-enrollment for failed recertification under the Lifeline rules for households receiving broadband-only Lifeline service for consumers affected by California wildfires.<sup>7</sup>

On November 15, 2023, the FCC adopted a Report and Order implementing the requirements of the Safe Connections Act of 2022, which, among other priorities, allows qualifying survivors of domestic violence and related crimes to receive emergency communications support for a period of up to six months.<sup>8</sup> In the Report and Order, the Commission designated the Lifeline program to provide discounted phone, internet, or bundled services to qualifying survivors, and in 2024, USAC implemented new processes to support survivors applying for and enrolling in the program. USAC updated application workflows, downstream systems, and implemented enhanced system controls to safeguard survivor confidentiality, reinforcing commitment to protecting vulnerable populations while delivering operational excellence. The Lifeline program undertook extensive outreach initiatives targeting affected communities, delivering impactful webinars, and releasing tailored resources to help raise awareness and guide survivors through the application process. These efforts supporting survivors included 12 newsletters, five webinars, and two office hours over six months. USAC continued to accept Lifeline applications for the Survivor Benefit throughout 2025.

## V. CONCLUSION

USAC is committed to continuous improvement of the National Verifier and welcomes feedback from all stakeholders. Over the recent years, through newsletters, webinars, surveys, and other communication tools, we have created open channels to explain functionality and processes; to answer questions from service providers, consumers, and other stakeholder groups; and to obtain feedback on the user experience.

During 2025, the National Verifier State & Federal Partnership team at USAC focused on strengthening and expanding connections with state and federal agencies to enhance the Lifeline program's efficiency. Over the course of year, USAC maintained National Verifier connections by ensuring reliable system performance and consistent efforts to ensure all Computer Matching Agreements (CMAs) remained effective and operational. As USAC works to establish additional database connections, key initiatives include cultivating relationships with agency partners and executing CMAs to establish secure database connections that support automated eligibility verification. By leveraging these new partnerships, USAC aims to streamline processing efficiency, improve data accuracy, and strengthen program integrity, while supporting timely access to Lifeline benefits for eligible consumers. Continued outreach and collaboration with additional agencies remain a priority to further strengthen Lifeline program operations.

In 2026, USAC will continue to track the performance of the National Verifier system and the

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*and Link Up Reform*, WC Docket No. 11-42, Order, 39 FCC Rcd 11776 (2024), at 3–4, paras. 5–6.

<sup>7</sup> *Lifeline and Link Up Reform et al.*, WC Docket No. 11-42 et al., Order, 40 FCC Rcd 480 (WCB 2025), at 3, para. 7.

<sup>8</sup> *Supporting Survivors of Domestic and Sexual Violence et al.*, WC Docket No. 22-238 et al., Report and Order, 38 FCC Rcd 11280 (2023); *see also* Safe Connections Act of 2022, Pub. L. No. 117-223, 116 Stat. 2280.

related operational processes, including those performed by the Lifeline Support Center, to identify inefficiencies and areas for improvement. We are focused on optimizing the application process in the National Verifier.

**Appendix: States/Territories Currently Providing Eligibility Database Checks to the National Verifier**

State	Connection to State Data Source?	Automated Data Connections Established	Lifeline Applications Received in 2025
Alabama	No	FPHA, CMS, VA	258,142
Alaska	No	FPHA, CMS, VA	26,270
American Samoa	No	FPHA, VA	2,781
Arizona	Yes	SNAP, FPHA, Tribal TANF, CMS, VA	356,743
Arkansas	No	FPHA, CMS, VA	178,867
California	Yes	SNAP	2,425
Colorado	Yes	SNAP, Medicaid, FPHA, CMS, VA	166,395
Connecticut	Yes	FPHA, SNAP, Medicaid, CMS, VA	39,092
Delaware	No	FPHA, CMS, VA	15,816
District of Columbia	No	FPHA, CMS, VA	20,932
Florida	Yes	FPHA, SNAP, Medicaid, CMS, VA	973,950
Georgia	Yes	FPHA, SNAP, CMS, VA	482,214
Guam	No	FPHA, VA	476
Hawaii	No	FPHA, CMS, VA	29,990
Idaho	No	FPHA, CMS, VA	28,131
Illinois	No	FPHA, CMS, VA	470,620
Indiana	Yes	FPHA, SNAP, Medicaid, CMS, VA	266,895
Iowa	Yes	FPHA, SNAP, CMS, VA	86,525
Kansas	No	FPHA, CMS, VA	43,696
Kentucky	Yes	FPHA, SNAP, Medicaid, CMS, VA	312,866
Louisiana	No	FPHA, CMS, VA	458,962
Maine	No	FPHA, CMS, VA	23,538
Maryland	No	FPHA, CMS, VA	375,495
Massachusetts	No	FPHA, CMS, VA	119,584
Michigan	Yes	FPHA, SNAP, Medicaid, SSI, CMS, VA	557,447
Minnesota	Yes	FPHA, SNAP, Medicaid, CMS, VA	176,628
Mississippi	Yes	FPHA, SNAP, CMS, VA	266,379
Missouri	Yes	FPHA, SNAP, Medicaid, CMS, VA	227,038
Montana	No	FPHA, CMS, VA	13,144
Nebraska	No	FPHA, CMS, VA	28,253
Nevada	Yes	FPHA, SNAP, Medicaid, CMS, VA	299,537
New Hampshire	No	FPHA, CMS, VA	9,201
New Jersey	No	FPHA, CMS, VA	405,443
New Mexico	Yes	FPHA, SNAP, Medicaid, CMS, VA	58,585
New York	No	FPHA, CMS, VA	3,467,911
North Carolina	Yes	FPHA, SNAP, CMS, VA	169,439
North Dakota	No	FPHA, CMS, VA	14,776

Northern Marianas	No	FPHA, VA	1,393
Ohio	No	FPHA, CMS, VA	617,324
Oklahoma	No	FPHA, CMS, VA	669,753
Oregon	Yes	Medicaid, SNAP, SSI	199
Pennsylvania	Yes	SNAP, Medicaid, FPHA, CMS, VA	1,153,836
Puerto Rico	Yes	FPHA, NAP/PAN, CMS, VA	696,191
Rhode Island	No	FPHA, CMS, VA	62,417
South Carolina	Yes	FPHA, SNAP, Medicaid, CMS, VA	258,100
South Dakota	No	FPHA, CMS, VA	13,656
Tennessee	Yes	FPHA, SNAP, CMS, VA	303,118
Texas	Yes	Medicaid, SNAP	810
Utah	Yes	SNAP, Medicaid, FPHA, CMS, VA	70,932
Vermont	No	FPHA, CMS, VA	9,695
Virgin Islands	No	FPHA, CMS, VA	604
Virginia	Yes	FPHA, SNAP, Medicaid, CMS, VA	313,432
Washington	Yes	FHPA, SNAP, Medicaid, CMS, VA	281,880
West Virginia	No	FPHA, CMS, VA	98,217
Wisconsin	Yes	FPHA, SNAP, Medicaid, SSI, CMS, VA	178,308
Wyoming	No	Medicaid, FPHA, CMS, VA	5,284
<b>Total</b>			<b>15,169,335</b>

## Key:

FPHA: Federal Public Housing Assistance

CMS: Centers for Medicare &amp; Medicaid Services (Federal Database)

VA: Veterans and Survivors Pension Benefit

SNAP: Supplemental Nutrition Assistance Program

TANF: Temporary Assistance for Needy Families

Medicaid: State Medicaid (State Database)

NAP/PAN: Puerto Rico's Nutrition Assistance Program

SSI: Supplemental Security Income

California, Texas, and Oregon have access to automated data sources and utilize them as part of their eligibility verification process. The National Verifier does not have direct access to these data sources.