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Reverification Process

Today's Presenters





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Course Objectives

Reverification Process



At the end of the course, you will...



...be able to:

- Plan a process to submit documentation to USAC for the reverification of your current consumers
- Identify which types of documents you need to submit for each consumer



...understand:

- Requirements & deadlines for the reverification process
- Your role in the process, including if you choose to opt-out of USAC-conducted outreach
- What documents the National Verifier will accept

Course Overview



- **01** OVERVIEW OF THE REVERIFICATION PROCESS
- **02** | STEP-BY-STEP REVERIFICATION PROCESS
- 03 | NLAD REPORTS
- **04** USAC-CONDUCTED OUTREACH AND THE OPT-OUT PROCESS
- **05** | ACCEPTABLE DOCUMENTATION
- **06 | SUBMIT TO USAC**

Section 1: Overview of the Reverification Process

Reverification vs. Recertification

What is reverification?



Reverification



- A separate, one-time process that is associated only with bringing current Lifeline subscribers into the National Verifier
- Requires a current subscriber to pass same eligibility checks as a new subscriber that enrolls through the National Verifier
- Timeline will vary by NV Launch

Recertification



- Annual process of confirming continued eligibility for the Lifeline benefit via selfcertification
- Per the Lifeline rules, does not require eligibility documentation
- Subscribers who pass reverification must be recertified one year following the date of their successful reverification
- Existed before the National Verifier

June 2019 Reverification Groups



Reverification for subscribers in the June 2019 Launch states (Arizona, Connecticut, Georgia, Iowa, Kansas, Nebraska, Nevada, New York, Vermont, Virginia, and West Virginia) will be performed in groups based on a subscriber's enrollment date.

- **Group 1:** Recent subscribers that enrolled January 1, 2019 through June 24, 2019
- Group 2 & 3: Subscribers that enrolled prior to January 1, 2019
- **Group 4:** Subscribers enrolled through the legacy NLAD process during the soft launch period (enrolled June 25, 2019 through October 22, 2019)

USAC Communications



USAC will make several announcements (via email and the USAC website) regarding the reverification process and window openings.

- On-hand Documentation Submission: Opens a 45-day window for service providers to provide on-hand documentation to USAC.
- Reminders: Notifications to service providers reminding them of upcoming document submission deadlines.
- **USAC Outreach to Subscribers:** USAC will notify service providers when outreach is conducted to subscribers who require additional documentation to complete reverification. Subscribers will be given 60 days to respond with documentation.
- **De-enrollments:** USAC will notify any affected service providers before any subscribers are de-enrolled for failing to reverify.

Note: To be added to the June 2019 launch list, email <u>LifelineProgram@usac.org</u>

Section 2: Step-by-Step Reverification Process

Step-by-Step Process



- 1. National Verifier performs automated database checks.
- 2. USAC opens the **45 day on-hand submission window** for service providers to submit documentation on file for subscribers with failures.
- 3. USAC completes review of existing documentation and conducts outreach to subscribers to collect documentation for unresolved errors.
 - USAC will collect documentation to resolve any remaining errors for subscribers unless service providers opt out.
- 4. USAC will de-enroll subscribers that do not submit acceptable documentation by the deadline, and de-enrolled subscribers will appear on the Failed Reverification De-Enroll Report.

STEP 1: Automated Database Checks



Reverification utilizes several checks to ensure that existing subscribers are eligible for Lifeline.

Automated Database Checks	If automated check fails
Automated eligibility databases	Requires proof of eligibility & Lifeline application
Third Party Identity Verification (TPIV), including checking whether the subscriber is deceased	Requires proof of identity and/or proof of life
USPS Address Matching Service (AMS)	Requires documentation of geo-coordinates or other proof of address
NLAD Duplicate Address	Requires an Independent Economic Household (IEH) form

Please see USAC's <u>Acceptable Documentation Guidelines</u> for additional information.



STEP 2: Service Provider On-Hand Document Submission

If the National Verifier **cannot** verify a subscriber's eligibility through automated checks, service providers will be required to submit any available documentation they have on hand for failed subscribers.

- Once USAC makes an announcement opening the 45 day on-hand submission window for service providers will:
 - Login to NLAD to view the Reverification Subscriber Status Report.
 - Review the failures and gather any existing documentation that would resolve the failures.
 - Send the documents to USAC within 45 days after USAC's announcement.
 - Preferred: Send electronic files via USAC's <u>secure webpage</u>
 Use the <u>document upload process</u> for instructions on how to prepare and submit files.
 - Alternative: Mail paper items to USAC
 Reverification Cover Sheet is required for all paper submissions.

Note: For Groups 2 & 3, only AMS, TPIV, Deceased, and IEH errors can be resolved with existing (onhand) documentation. *Service providers should not submit certifications or program eligibility documents for subscribers in Groups 2 & 3.*



STEP 3: Outreach to Subscribers to Collect Documentation

If the National Verifier **cannot** verify a subscriber's eligibility from documentation provided by service providers, USAC will reach out to subscribers to collect documentation for unresolved failures.

- Subscribers will receive a letter from USAC requesting the documentation needed to resolve errors. The letter will provide details on what documentation is needed and how to submit it to USAC.
- Subscribers will be required to submit documentation within 60 days.

Subscribers could be asked to submit documentation for any or all of the following:

- Proof of Eligibility
- Lifeline application form
- One-per-household worksheet

- Proof of date of birth
- Proof of social security number
- Proof of valid address

Please see USAC's <u>Acceptable Documentation Guidelines</u> for additional information.

Universal Service Administrative Co.

STEP 4: National Verifier Determines Eligibility

USAC will review all of the documentation collected, whether the service provider or USAC conducted the subscriber outreach.

- Subscribers that successfully complete reverification will maintain their Lifeline benefit. No further action is required until they are required to recertify their eligibility by their next anniversary date which is reset upon the completion of reverification.
- USAC will de-enroll subscribers that fail reverification from NLAD and mail a deenrollment notice.

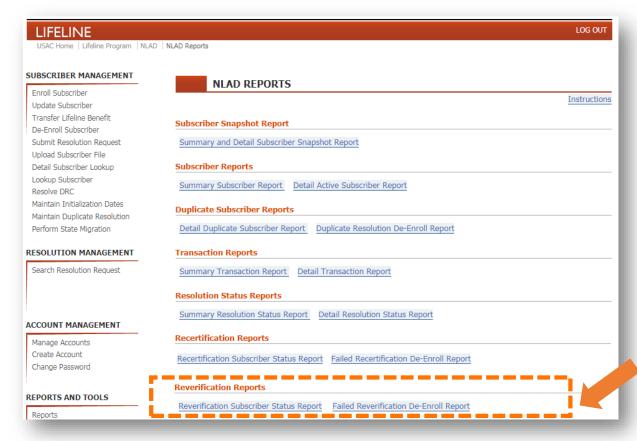
After the reverification process is complete, the Failed Reverification De-Enroll Report in NLAD will show which subscribers failed the reverification process and that USAC has de-enrolled.

Section 3: NLAD Reports

Reverification Process



The **Reverification Subscriber Status Report** provides service providers with the reverification status for each of their consumers.

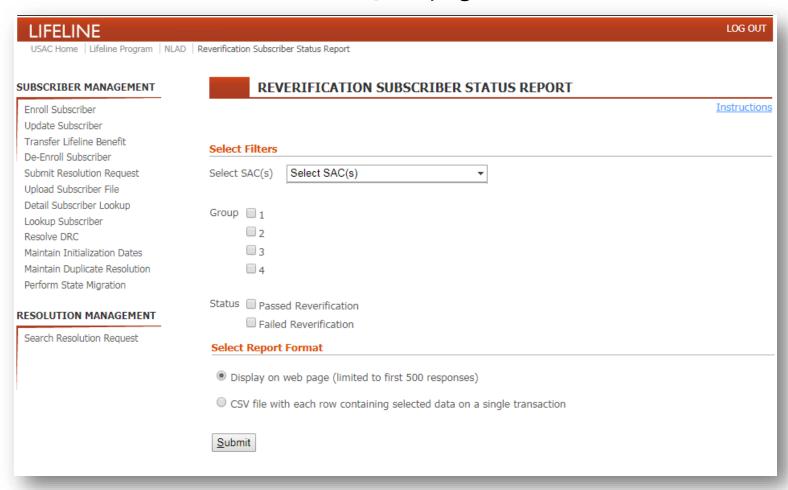


Where to find the Reverification Subscriber Status Report in NLAD

Reverification Process



Reverification Subscriber Status Report page in NLAD



Reverification Process



The Reverification Subscriber Status Report:

- Available in NLAD upon the completion of USAC's automated reverification checks for each subscriber and is updated as documentation reviews are conducted
- Updated daily, but the report is subject to change
 - Service providers should only take action when USAC makes official announcements
- Shows whether a subscriber has passed reverification, and, if they haven't, which errors still need to be resolved for that subscriber
- Shows whether documentation was reviewed for each error and whether the documentation was approved or rejected

Reverification Process



The Reverification Subscriber Status Report provides the status for each of the following potential errors.

Error	This field indicates
Data Source Check Fail	If the subscriber failed the automated eligibility check
TPIV DOB Failure	If the subscriber failed the date of birth check
TPIV SSN Failure	If the subscriber failed the SSN check
TPIV Not Found Failure	If the subscriber failed the identity check
AMS Fail	If the subscriber failed the address check
Duplicate Address Failure	If the subscriber failed the duplicate address check
Cert Form Required	If the subscriber is required to provide a certification form to pass rever

Reverification Process

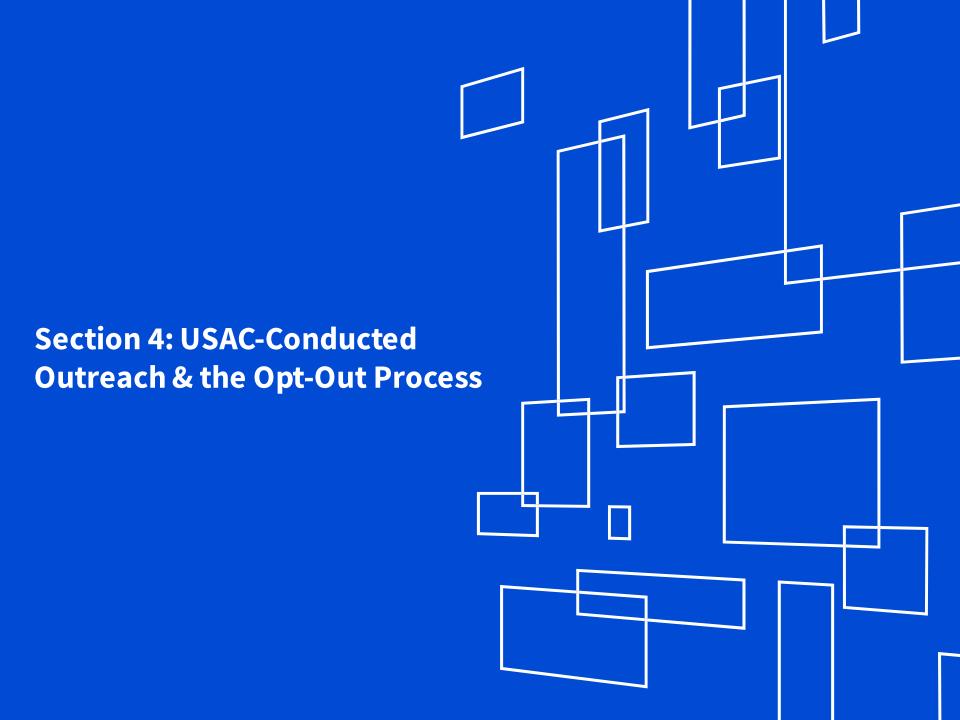


In the **Reverification Subscriber Status Report**, errors and resolutions are in separate columns.

Column Type	Description
Y – indicates a failed check, that requires additional documentation	
Failure	N – indicates a passed check, and no documentation is required
Resolution	Blank - indicates that no review of documentation has occurred
	Y – indicates that documentation has been reviewed that resolved the error
	N – indicates that documentation has been reviewed that did not resolve the error

After the reverification process is complete, USAC will conduct de-enrollments of subscribers that have not qualified. The **Failed Reverification De-Enroll Report** will show which consumers failed the reverification process and have been de-enrolled from NLAD.

The report will be updated several times as USAC conducts new de-enrollments.



Consumer Outreach

Reverification Process



USAC will conduct outreach to subscribers who require additional documentation to complete reverification. Subscribers will be given 60 days to respond with documentation.

- Subscribers who require new program or income eligibility documentation will be provided a copy of the National Verifier Application Form to send back with their eligibility proof.
- Subscribers with a duplicate address failure will be provided a copy of the Independent Economic Household worksheet to return to USAC.
- Subscribers with a TPIV (including deceased) error and/or an AMS error will be provided acceptable documentation guidelines in order to successfully submit documentation.

Consumer Outreach

Reverification Process



Service providers may reach out to applicable subscribers before the 60-day reverification window to inform them about USAC and the reverification process. Correspondence may include:

- General information about USAC and the requirement to reverify their eligibility to keep their benefits
- USAC will reach out to them and request personal documentation from them
- If they do not respond to USAC's outreach, they may lose their Lifeline benefit

Service providers **should not** tell subscribers timeframes of when they should expect to receive letters as these dates are subject to change.

Note: USAC will provide notice to ETCs about 7 days prior to conducting outreach to subscribers.

Opt Out of USAC-Conducted Outreach

Reverification Process



Service providers may opt out of USAC-conducted outreach and choose to reach out to their subscribers instead. Service providers that opt-out of USAC-conducted outreach have several additional requirements.

- Service providers must ensure that all subscribers that have not passed reverification after USAC's initial review are contacted and given the opportunity to prove eligibility.
- The notice sent to subscribers by service providers must be in writing (separate from the subscriber's bill and in clear, easy to understand language), must indicate what documentation (or type of document) is needed, and must provide exactly 60 days for the subscriber to respond.
- Service providers must collect the documentation received from subscribers (cannot direct subscribers to mail directly to the Lifeline Support Center), must submit the documents to USAC by the date they are due (see timeline on *next slide*), and must follow all document submission guidelines.

Opt Out of USAC-Conducted Outreach

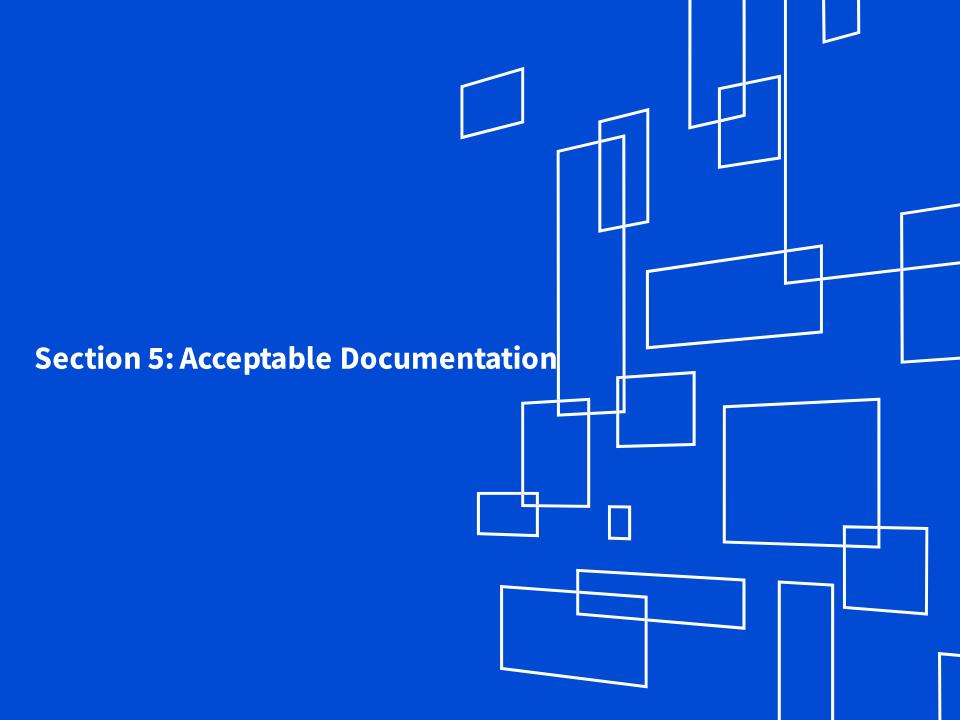
Reverification Process Timelines



Service providers who opt out of USAC-conducted outreach will have the following timelines.

- 1. Opt-out service providers will have **45 days** to provide all on-hand documentation for Groups 1 4 that would resolve open failures for their subscribers (except program/income eligibility documentation and certifications for *Groups 2 & 3*). This step is the same for opt-out as it is for every other service provider.
- Once USAC completes initial reviews and makes an announcement that outreach is beginning, opt-out service providers will have 90 days to submit to USAC any documentation collected for Group 1 & 2 subscribers and 120 days for Group 3 and 4 subscribers. The 90- and 120-day windows include the 60 days service providers must give subscribers to respond.

The opt-out period for June 2019 launch starts today, October 14, 2019, and ends on October 29, 2019. The link to the opt-out form is available here and will be emailed to all June 2019 launch service providers.



Acceptable Documentation

National Verifier – Eligibility



Documentation that proves participation in a Lifeline qualifying program must include:

- The consumer's name, or the name of consumer's benefit qualifying person (BQP);
- The name of the Lifeline-qualifying program, such as SNAP;
- The government or Tribal program administrator or the managed care organization (MCO) that issued the document; and
- An issue date within the last 12 months or a future expiration date that aligns with the benefit period.

Acceptable Documentation

National Verifier - Other



- Visit our <u>website</u> for details regarding acceptable documentation for income.
- The website also includes types of acceptable documentation for:
 - Proof of identity (TPIV dispute resolution)
 - Proof of Life (Deceased dispute resolution)
 - Proof of address (AMS dispute resolution)



Submit to USAC

How to Submit Documents to USAC



Submission options:

- 1. Provide documents via USAC's <u>secure webpage</u> (preferred)
 - Use the <u>document upload process</u> for instructions on how to prepare and submit files.
- 2. Mail paper documents to USAC
 - For mailed in documents, the postmarked date must meet the deadline for each window.
 - Reverification Cover Sheet is required for all paper submissions.

USAC will not accept documentation until after the respective June 2019 launch Reverification announcements are made. Credentials for the secure webpage will be provided when USAC opens up the 45 day window to submit existing documentation.

Submit to USAC

Via Secure Webpage



- Prepare a single PDF document per consumer
 - Submit all documentation as one PDF per consumer
 - Use the naming convention Application ID.pdf for example, XXX-123-4X56.pdf
 - Use the Application ID shown on the Reverification Subscriber Status Report
 - Combine the batch of consumer PDFs into a single.zip file
 - Use the naming convention nv_reverification_SACname_MMDDYYYY_HHMMSS.zip for example, nv_reverification_americantelco_12152017_153056.zip
 - For the hours minutes and seconds, please use a 24-hour clock
- Upload the .zip file to the secure webpage
 - Upload the completed reverification.zip files to the "Reverification" folder on the secure webpage

Submit to USAC

Via Mail



- Mail paper documents to USAC
 - Use the <u>required cover page</u> for each consumer showing only their application ID (as shown in the <u>Reverification Subscriber Status Report</u>) and last name.
 - Use the cover sheets to create separation between each consumer's documentation (do not staple or paper clip). Use a cover sheet any time you are mailing documents for a consumer for reverification.
- Mailing address

USAC Lifeline Support Center

P.O. Box 7081

London, KY 40742

Questions?

Thank You!

- Thank you for joining us!
- Sign up for Lifeline Program email updates and upcoming events
 - Visit usac.org/li and click "Subscribe" in the upper right hand corner
- Need help? Contact us!
 - General: <u>LifelineSupport@usac.org</u>
 - Specific reverification questions:
 <u>LiVerifications@usac.org</u>

