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# LIFELINE NATIONAL VERIFIER PLAN

**JANUARY 2021**



**Universal Service  
Administrative Co.**

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

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

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

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

The 2016 Lifeline Order also directed USAC to launch the National Verifier<sup>2</sup> in all states and territories by the end of 2019.

<sup>1</sup> Data sources of qualifying eligibility programs (e.g., Medicaid).

<sup>2</sup> Throughout the plan we use the terms National Verifier and NV interchangeably.

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

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## Stronger Program Integrity



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

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## Enhanced Customer Experience



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

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## Cost Effectiveness



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

**USAC designed the National Verifier to meet these objectives. Stakeholder feedback informs the National Verifier implementation and USAC has continuously integrated stakeholder input throughout the multi-year rollout. A list of recent and upcoming improvements can be found on slides 15 and 16.**

# In accordance with the 2016 Lifeline Order, we successfully launched the National Verifier by the end of 2019

## **USAC and the FCC accomplished the following by the end of 2019:**

- Delivered on the 2016 Lifeline Order's expectation of launching the National Verifier with standardized eligibility verification in all states and territories.
  - All 55 states and territories and the District of Columbia (DC) either soft launched or fully launched; two federal database connections and 15 state database connections established;
  - Partnered with California, Oregon, and Texas to soft launch existing eligibility verification processes, providing access to two additional state database connections.
  - Created an estimated \$7.6M in savings in potential manual review costs by having automated connections to state/federal eligibility databases.
- Significantly increased overall automated eligibility pass rate by adding the Centers for Medicare & Medicaid Services (CMS) connection.
- Received more than 1.4M applications since the initial launch of the NV.
- Fulfilled carrier requests for an integrated application experience through new Eligibility Check API, which is now the source of the majority of applications to the National Verifier.

# We have continued to enhance the National Verifier in 2020

- As of December 18, 2020, all 56 states and territories, including the District of Columbia are fully launched in the National Verifier.
  - The three NLAD opt-out states (CA, OR, and TX) fully launched with a modified approach, where the states continue eligibility verification subject to enhanced program integrity measures developed in partnership with the FCC and USAC.
  - Added five additional state/territory database connections in Puerto Rico, Nevada, Wisconsin, Washington, and Florida. The National Verifier also benefits from connections to state databases in Texas and Oregon, bringing the total number of state/territory automated connections utilized in verifying eligibility for the federal Lifeline program to 22. See the National Verifier map on slide 31 for more details.
- Deployed a series of enhancements to improve system usability and navigation across mobile and tablet devices.
- Implemented recertification changes in accordance with the 2019 Lifeline Order in October 2020. Recertification will resume when the COVID-19 waivers lift.
- Released updates to National Lifeline Accountability Database (NLAD) to meet federal accessibility requirements.
- Integrated address update workflow between the National Verifier and NLAD systems to reduce the service provider and consumer burden to resolve address errors.
- Provided more channels for customers to check application and enrollment status, including utilizing the IVR system.

## Program adjustments in response to COVID-19 Pandemic (1/2)

**The FCC and USAC took action beginning in March 2020 to ensure consumers have access to voice and broadband services that are especially vital during the COVID-19 pandemic, and these measures are set to remain in place until February 28, 2021. As part of these measures, the FCC and USAC have:**

- Temporarily waived general de-enrollment, non-usage de-enrollment, annual recertification, and reverification requirements to prevent consumers from being involuntarily removed from the Lifeline program.<sup>1</sup> Process flows outlined herein for de-enrollments associated with recertification and reverification are currently suspended.
- Adjusted the acceptable documentation guidelines for Lifeline income-based eligibility to make it easier for recently unemployed consumers to apply.
- Accepted recently-expired driver's licenses or state identification cards when needed to complete a Lifeline application.
- Allowed consumers on rural Tribal lands to immediately receive Lifeline service even if they still need to submit documentation to complete their application. Those subscribers then have 45 days to verify their eligibility through the National Verifier or they will be de-enrolled.

<sup>1</sup> Though the FCC has temporarily waived involuntary de-enrollment rules, subscribers may still choose to de-enroll from the program.

## Program adjustments in response to COVID-19 Pandemic (2/2)

**The FCC and USAC collaborated with numerous federal, state, and local partners to increase access to Lifeline service during the COVID-19 pandemic. For example, we:**

- Coordinated with the Department of Health and Human Services, Department of Housing and Urban Development (HUD), and other federal agencies to promote the Lifeline program among newly eligible consumers.
- Provided targeted information to food banks and homeless shelters to spread awareness of the program.
- Provided state agencies such as state PUCs and social service organizations, direct access to the National Verifier to assist Lifeline applicants with the application process.
- Conducted outreach to over 13,000 food banks and homeless shelters to spread awareness of the program.
- Held training sessions for consumer advocates and stakeholder groups nationwide to educate them on the program and National Verifier enrollment process.

# Overview of the National Verifier Plan

## PURPOSE

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

## BACKGROUND

**This is the eighth and final update of the National Verifier Plan (the NV Plan) which was created in response to the 2016 Lifeline Order adopted by the FCC in March 2016. The Order required USAC to provide bi-annual updates until the implementation of the National Verifier was complete. The Wireline Competition Bureau at the FCC reviewed and provided input on the initial release and each subsequent update. Stakeholders can continue to access information and provide feedback using the resources mentioned below.**

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

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

# National Verifier Launches

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



<sup>1</sup> Puerto Rico fully launched on June 23, 2020.

<sup>2</sup> California fully launched on December 18, 2020.

## National Verifier Database Connections (1/2)

Through the National Verifier's state and federal partnerships, there are currently 22 state/territory connections and two federal databases used to automatically validate eligibility of applicants for the federal Lifeline program. This includes Oregon and Texas, where the National Verifier relies on automated state eligibility processes, and the states have access to automated data sources for eligibility verification (see slide 12 and 13 for more detail on eligibility verification in the NLAD opt-out states).

Connections to state databases allow a check for Supplemental Nutrition Assistance Program (SNAP) participation, as well as Medicaid and Supplemental Security Income (SSI) participation and income-based eligibility, where available.

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

USAC has federal automated database connections with CMS, providing automated eligibility confirmations for consumers receiving Medicaid, and HUD, providing automated eligibility confirmations for consumers receiving Federal Public Housing Assistance.

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

## National Verifier Database Connections (2/2)

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

- The connection to CMS, which became available in September 2019, increased the average automated pass rate in states and territories without connections to state databases from 6% to around 60%.<sup>1</sup>
- As of mid-January, the National Verifier's overall automated eligibility pass rate was 71%.
- In states and territories with connections to state databases, automated eligibility pass rates are even higher. In states and territories with connections to state databases, the National Verifier is automatically verifying the eligibility of up to 88% of Lifeline consumers.
- As of December 31, 2020, USAC has processed nearly 6.8 million new Lifeline applications since launching the National Verifier.

<sup>1</sup> From the initial launch of the National Verifier in June 2018 through August 2019, the average automated pass rate in states and territories without connections to state databases was 6%. Since the connection to CMS was enabled in September 2019, there has been an automated pass rate of about 60% in states without a connection to state databases.

## National Verifier Full Launch in NLAD Opt-Out States (1/2)

California, Oregon, and Texas have managed eligibility verification and duplicate checking for the federal Lifeline program for many years. The FCC has determined that it is appropriate for the National Verifier to rely on those existing state agency functions, forging a partnership with the states to streamline the application process for consumers and further strengthen program integrity.

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

In the limited circumstances where a state does not verify the eligibility of subscribers, and service providers have performed such processes (i.e., broadband-only consumers in California), the National Verifier conducts eligibility verification as it does in other states.

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

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

## National Verifier Full Launch in NLAD Opt-Out States (2/2)

The National Verifier fully launched in Oregon and Texas on November 18, 2020. Consumers in these states (including consumers on Tribal lands in Oregon who previously applied for Lifeline through their service provider) apply through the states' processes, which enables automated eligibility verification for most consumers.

The full launch of the National Verifier in California took place on December 18, 2020 using the same partnership model followed in Oregon and Texas. The National Verifier took over eligibility verification for broadband-only subscribers at that time. Additionally, the National Verifier will conduct one-time reverification for these consumers once the COVID-19 waivers lift.<sup>1</sup>

USAC updated the Lifeline claims process to further enhance program integrity efforts by reducing incorrect/over claims for the NLAD opt-out states. As of January 2021, service providers may only submit claims in LCS for subscribers who have been approved by the state.

<sup>1</sup> USAC will not begin Reverification until the current COVID-19 waivers expire.

## Performance of the National Verifier

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

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

We track response metrics to ensure consumers are being assisted in a timely manner. The average speed to answer a phone call at the Lifeline Support Center from July 2020 to December 2020 was 22 seconds and the average time to perform a manual application review was under 6 minutes.

We are also focused on ensuring the application process in the National Verifier system moves along in a timely manner. To track this goal, we look at database response time as well as the length of time to complete an application. The average automated database response time from July to December 2020 was approximately one second, and, in December 2020, over half of applications that did not require a manual review were completed in six minutes or less.

## Continuous Improvement of the National Verifier (1/2)

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

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

**Twenty-nine carriers are authorized to access the API, consistent with USAC's expectations that 25-30 carriers would use the API.**

- More than 4.2 million applications have been submitted through the API since it deployed in early December 2019.
- As more carriers have obtained access to the API, we have seen a shift in how applications are submitted. The API continues to be the submission method used by our largest ETCs and in December 2020, 89% of applications were submitted via API .

## Continuous Improvement of the National Verifier (2/2)

**In 2020, USAC and the FCC worked to further improve NV systems and processes in response to the 2019 Lifeline Order, which was released by the FCC on November 14, 2019. The Order established the following new/modified requirements:**

- Prohibits carriers from paying commission on Lifeline enrollments to their agents/employees (effective February 25, 2020).
- Codified existing USAC processes to prevent fraudulent enrollment of deceased subscribers (effective October 13, 2020) and ensure carriers cannot claim more subscribers than are recorded in NLAD (effective January 27, 2020).
- Requires eligibility documentation to be collected in certain instances during annual recertification (effective October 13, 2020).
- Codified rules regarding the creation and use of the Representative Accountability Database (RAD) (effective May 25, 2020).
  - USAC developed and launched the first phase of RAD on June 25, 2019, allowing representatives to register and obtain a unique ID. The registration process involves verification of the representative's identity.
  - As of May 25, 2020, all representatives are required to provide their representative ID with all enrollment transactions, benefit transfers, subscriber information updates, recertification transactions, and de-enrollment transactions.
  - USAC monitors representative activity and may lock representative accounts as necessary.

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

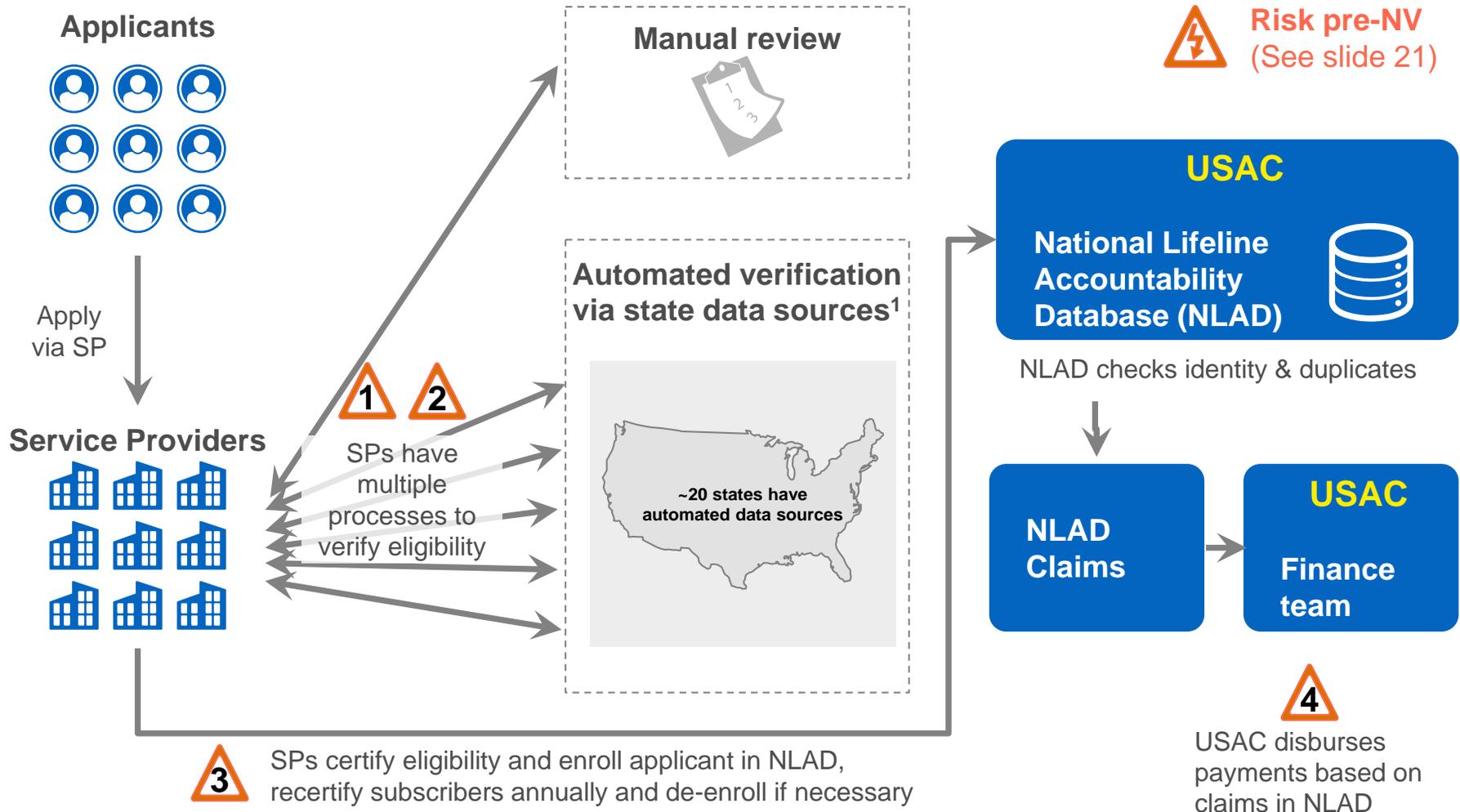
		Current % of Lifeline applicants qualifying through criterion <sup>1</sup>	Comments
Medicaid		71%	<ul style="list-style-type: none"> <li>Qualify through enrollment in Medicaid</li> </ul>
SNAP		25%	<ul style="list-style-type: none"> <li>Qualify through enrollment in SNAP</li> </ul>
SSI		<1%	<ul style="list-style-type: none"> <li>Qualify by receiving SSI payments</li> </ul>
Federal Public Housing Assistance		1%	<ul style="list-style-type: none"> <li>Qualify by receiving federal public housing benefits</li> </ul>
Income		3%	<ul style="list-style-type: none"> <li>Qualify if income is at or below 135% of the federal poverty line</li> </ul>
Tribal <sup>2</sup>		<1%	<ul style="list-style-type: none"> <li>Qualify by receiving certain Tribally-focused assistance programs<sup>3</sup></li> </ul>
VA		<1%	<ul style="list-style-type: none"> <li>Qualify by receiving the Veterans Pension/ Survivor Benefits</li> </ul>

<sup>1</sup> Percentages as of December 2020. Numbers do not add to 100% due to the 2016 Lifeline Order's removal of certain qualifying criteria for Lifeline eligibility determination.

<sup>2</sup> Must live on Tribal land to qualify through Tribal programs.

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

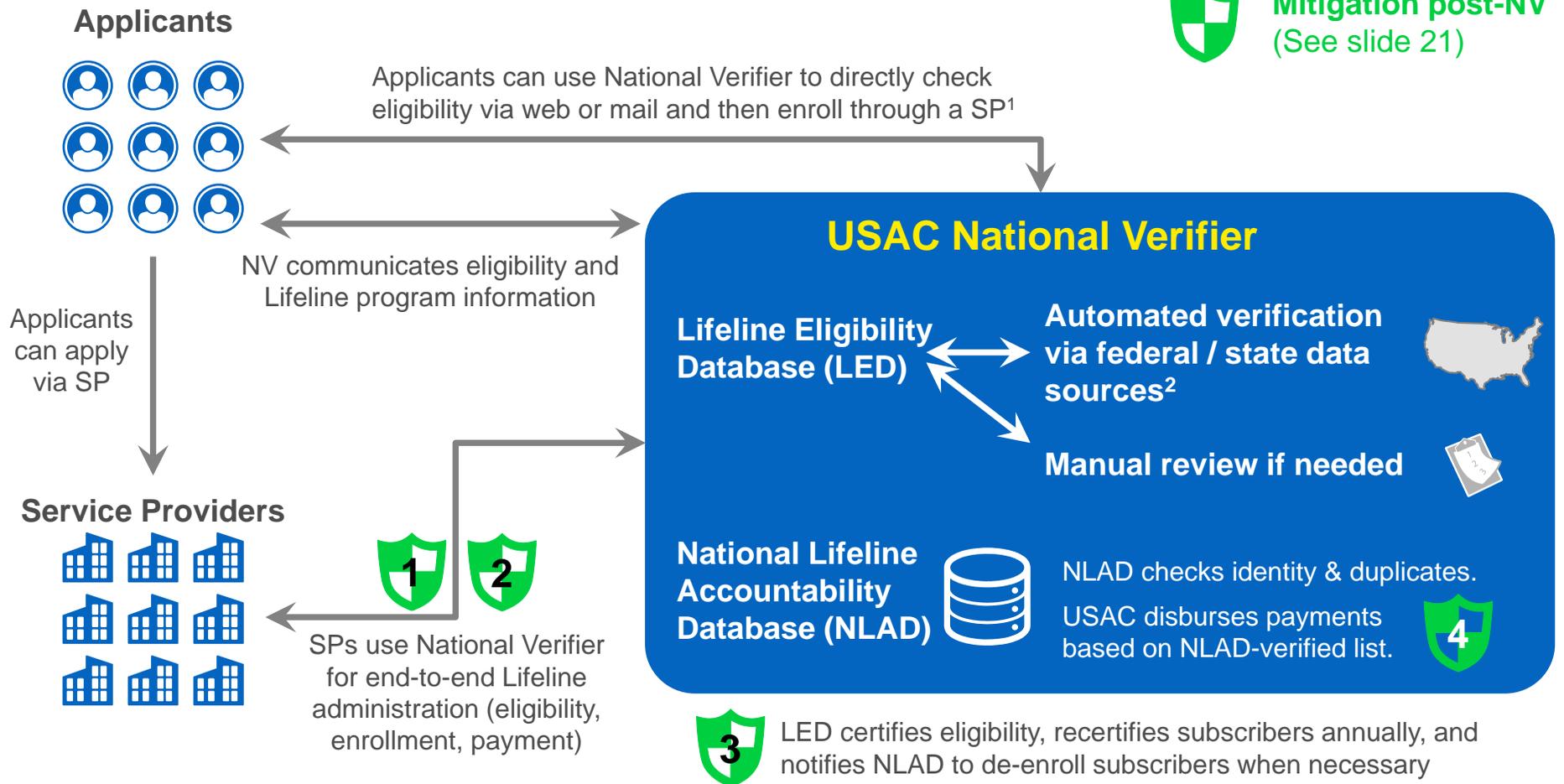
# Lifeline has moved from relying solely on service providers to conduct eligibility verification...



<sup>1</sup> For example: Medicaid, SNAP, SSI.

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

 Mitigation post-NV  
(See slide 21)



<sup>1</sup> If eligible, applicant receives application number and list of nearby SPs.

<sup>2</sup> For example, Medicaid, SNAP, SSI.

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

## Pre-NV program integrity risk



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



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



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



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

## NV mitigation strategy



Centralizes eligibility verification with USAC, a neutral party



Standardizes eligibility verification processes through the National Verifier

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



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

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



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

# With the implementation of the National Verifier, USAC conducts independent eligibility verification determinations

## Service Providers

Facilitate consumer application process (unless Consumer Portal is used)

Support document upload for manual eligibility checks (if needed)

Provide consumer support as appropriate

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

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

Conduct annual recertification

## USAC

Conduct identity and duplicate checks (NLAD)

Process consumer applications and confirm eligibility prior to enrollment

Conduct all annual recertifications

Provide full service consumer support

Complete computer matching agreements with state and federal agencies

*New roles*

*Reduced burdens*

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

# High-level overview of the system

## Eligibility

### Lifeline Eligibility Database (LED)

- One eligibility engine with many functions:
  - Query qualifying program data sources to determine eligibility;
  - Store yes / no eligibility results; and
  - Queue applications to BPO for manual review when necessary<sup>1</sup>
- Portals for eligibility verification (e.g., consumer web portal)

Federal /  
State data  
sources



## Enrollment

### National Lifeline Accountability Database (NLAD)

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



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

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

# Functions and processes in place to support the system

Capabilities come from both internal and external sources

## USAC capabilities

### USAC / Lifeline team

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**Rigorous vendor management**

**Additional capacity for stakeholder engagement and development of computer matching agreements**

**Complex project planning and KPI tracking**

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

## Vendor capabilities

### Systems integrator

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

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

**Tests the National Verifier systems to ensure an optimal user experience**

### BPO provider

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**Manual processes and consumer call center to:**

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

**General consumer support, including all dispute resolutions**

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

## Total Build Budget for the National Verifier

- After fully launching in all remaining states and territories in 2020, the NV build is slightly under the total budget.

	2016 Estimate	Actual (through December 2020)
<b>National Verifier build grand total (\$)</b> <i>(costs incurred over ~3 years)</i>	<b>~\$35-\$40M</b>	<b>\$39.6M</b>

## Annual Steady State Estimate vs Actual 2020 Steady State Cost

- The 2016 Estimate was based on an assumption that the Lifeline Program would have over 13M subscribers in 2020. As of December 2020, the program had 8.5M subscribers. In addition, the waivers put in place by the FCC during the COVID-19 pandemic halted reverification and recertification, further reducing verification and consumer support costs.

	2016 Estimate	2020 Cost
<b>Verification:</b> <ul style="list-style-type: none"> <li>Application processing;</li> <li>Eligibility verification (automated / manual); and</li> <li>Recertification outreach.</li> </ul>	~ \$25-30M	\$6.9M
<b>Consumer support:</b>	~ \$10-15M	\$4.0M
<b>Tech systems / tools:</b>	~ \$4-6M	\$2.4M
<b>Human capital:</b>	~ \$3-5M	\$1.8M
<b>Operations grand total (\$):</b>	<b>~\$40-\$55M</b>	<b>\$15.1M</b>

See comparison to current costs incurred by SPs on next slide

# NV direct verification costs estimated at half of direct verification costs previously incurred by service providers

## Efficiencies gained by the National Verifier

### Increased automated verification for enrollment

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

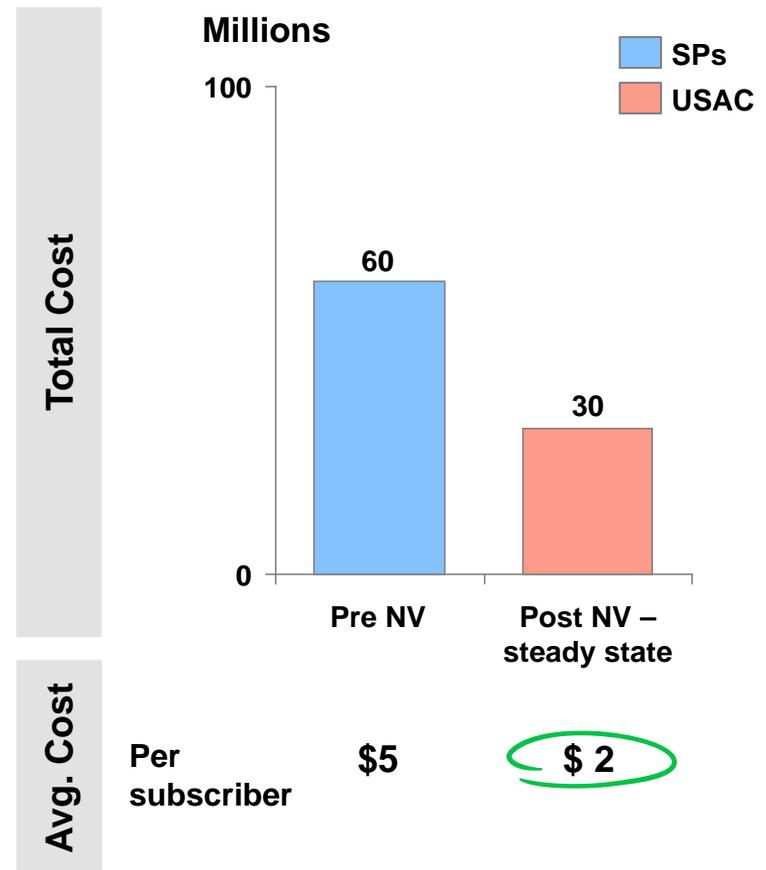
### Automated verification and notification for recertification

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

### Larger volumes enable efficiencies of scale and drive down costs.



## Estimated direct verification cost savings<sup>1,2</sup>



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

<sup>2</sup> In the NLAD opt-out states (CA, TX, and OR), the states continue to bear the cost of eligibility verifications (except broadband-only consumers in California). Oversight and coordination with the National Verifier ensures consistent quality and program integrity.

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## Eligibility Data Sources: Executive summary

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

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

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

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

**USAC and the FCC have computer matching agreements, which, together with other available state data sources for Texas and Oregon, enable access to 22 state/territory databases and two federal, nationwide databases (CMS and HUD).**

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

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

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

*Focus of this section*

## Eligibility data sources can be accessed in multiple ways

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

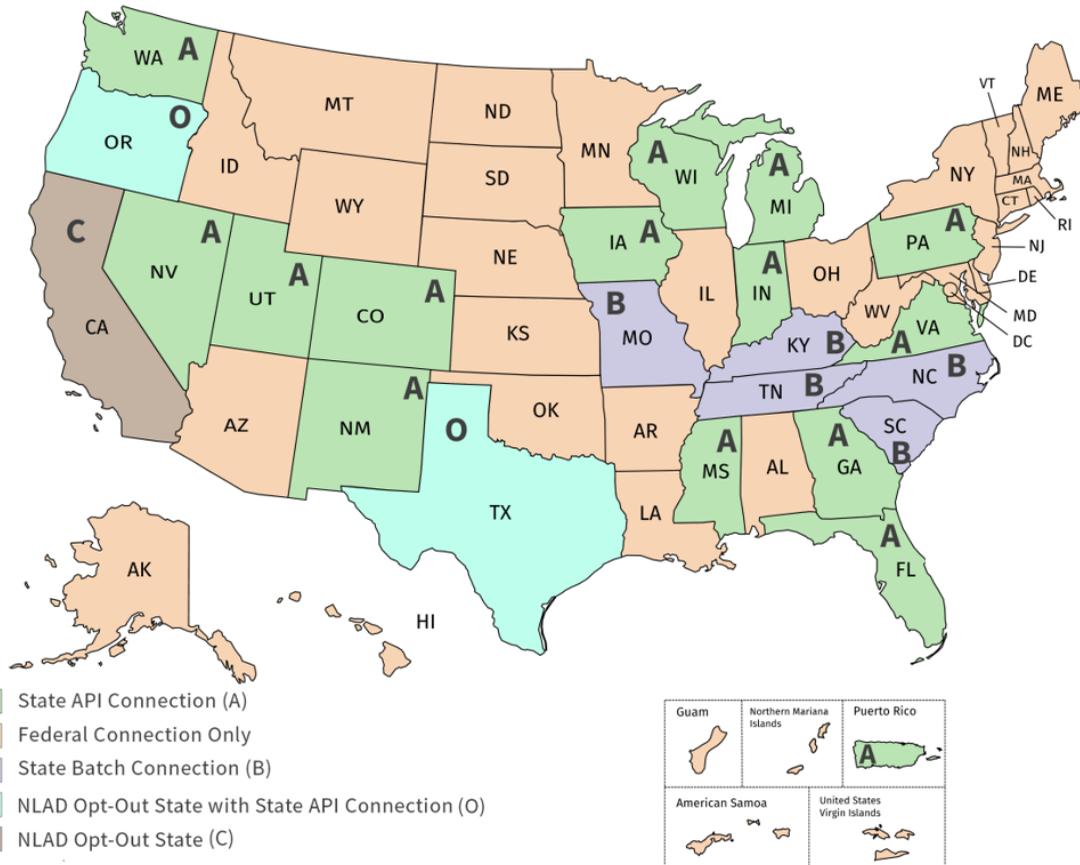
- **Application Programming Interface (API):** Connections that transfer data in real time on a per inquiry basis.
- **Batch Processing:** Connections that provide results for multiple inquiries on a regular basis - daily, weekly or monthly.

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

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

# States and territories have different types of automated connections

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



The National Verifier connects to state/federal databases via API connection or Batch connection.

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

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

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

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

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

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

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

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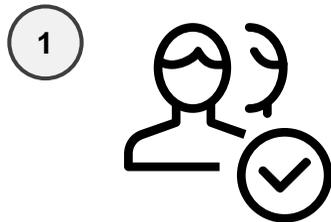
## Process Flows and Descriptions: Executive Summary (1/2)

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

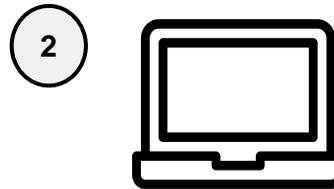
- A** Eligibility Check
- B** Manual Review
- C** Consumer Information Update
- D** Benefit Transfer
- E** Recertification
- F** Reverification
- G** Claims and Disbursements

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

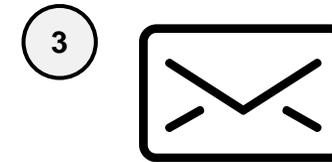
Consumers have three ways they can apply through the National Verifier:



Service provider, state PUC, or a social service organization assists consumer through application in the NV Web Portal or via the Eligibility Check API.

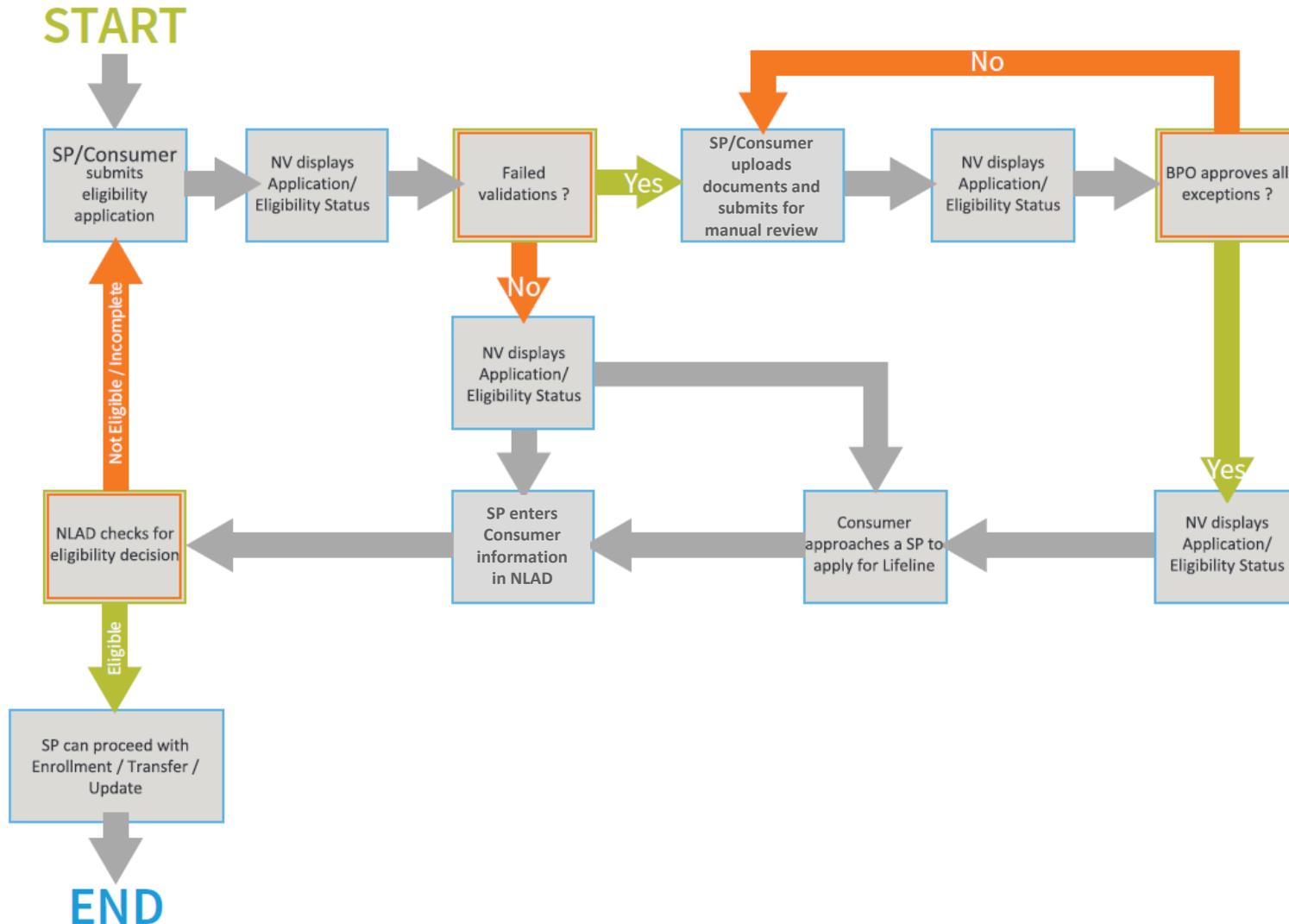


Consumer applies directly via the NV Web Portal or directly via the Service Provider Eligibility Check API.



Service provider/consumer mails in application/ documentation.

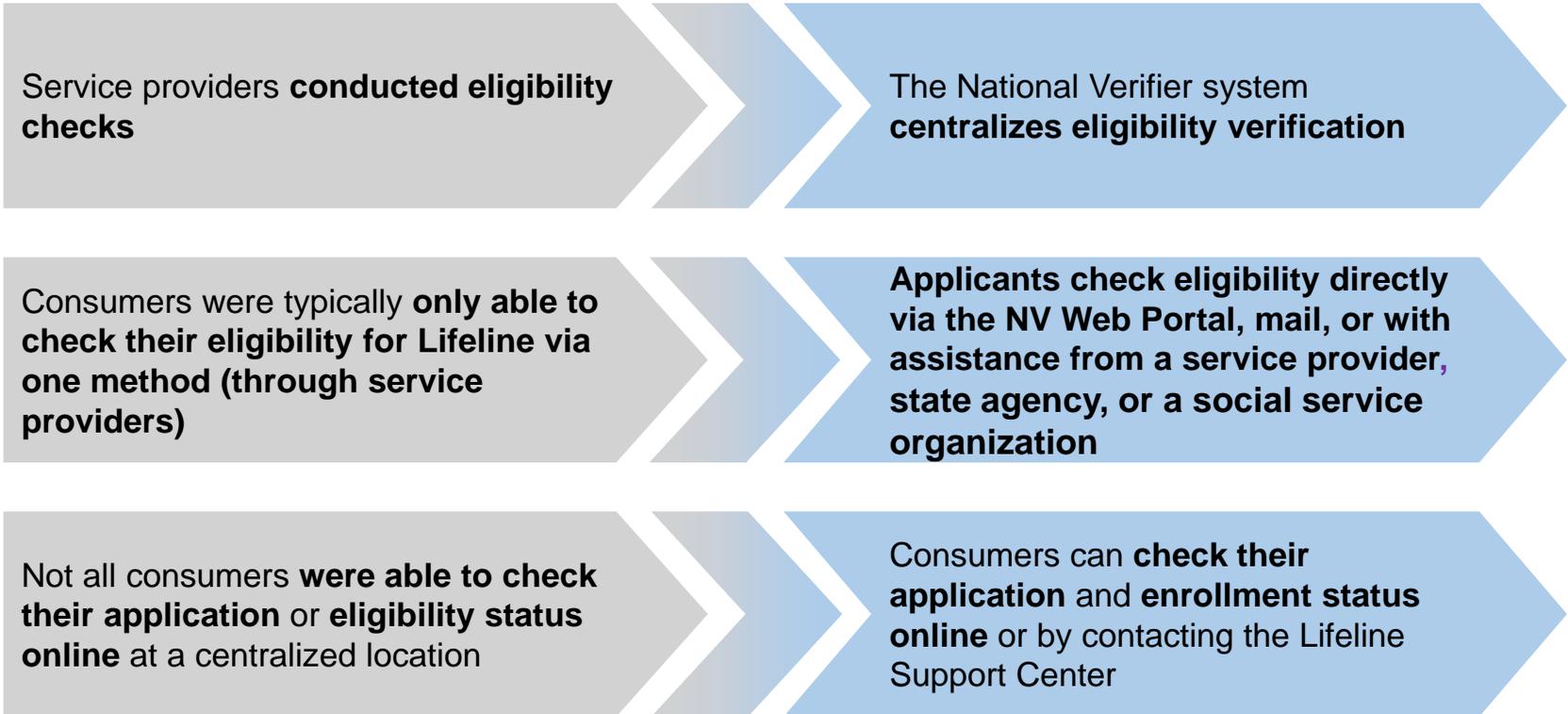
# Process Flow: Eligibility Check



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

## Before the National Verifier

## With the National Verifier



## Process Description: Service Provider Access

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

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

With the implementation of RAD, SP representatives must obtain a representative ID for monitoring activity when interacting with USAC systems. The existing NLAD/NV account management structure is utilized for RAD.

State agencies and social service organizations assisting Lifeline applicants with the application process are subject to the same rules and follow a similar method to access the National Verifier.

Please see slide 16 for more detail on the RAD processes.

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

## Process Description: Application with SP Assistance

### 1 GATHER INFORMATION

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

### 2 CONSENT, CERTIFY AND SIGN

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

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

### 3 RESULTS

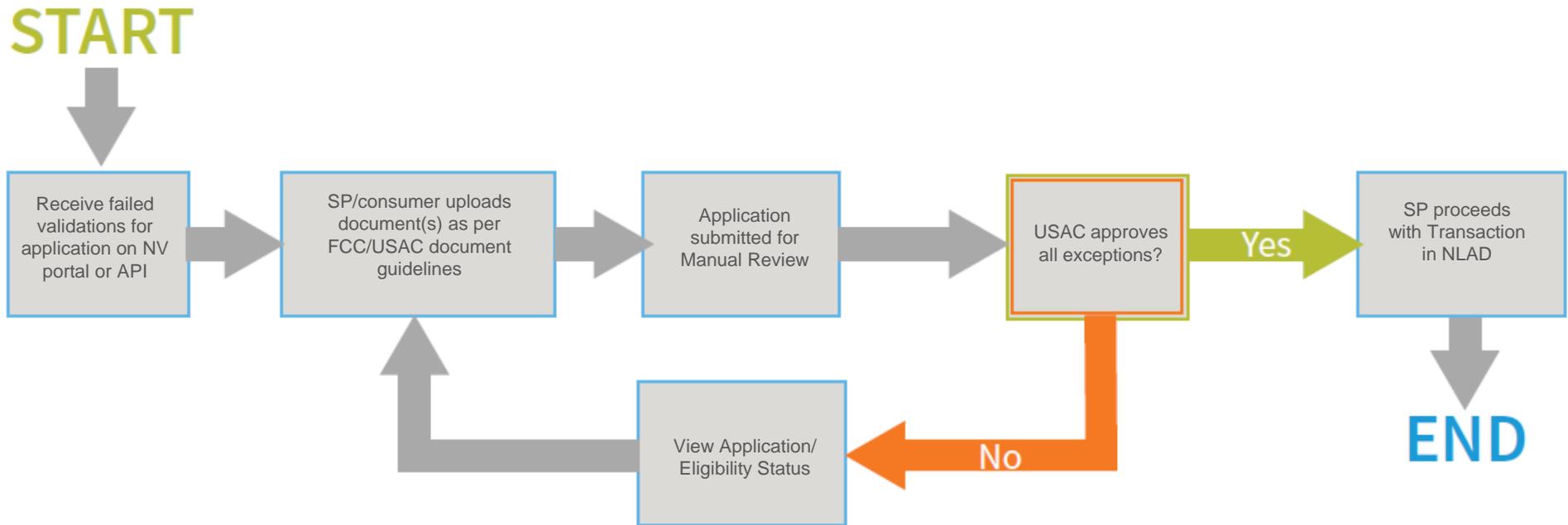
Once the service provider representative finishes assisting the consumer with the process, the representative will see the consumer's status and whether the consumer can be enrolled. Result types are on the next page.

## Process Description: Result Types

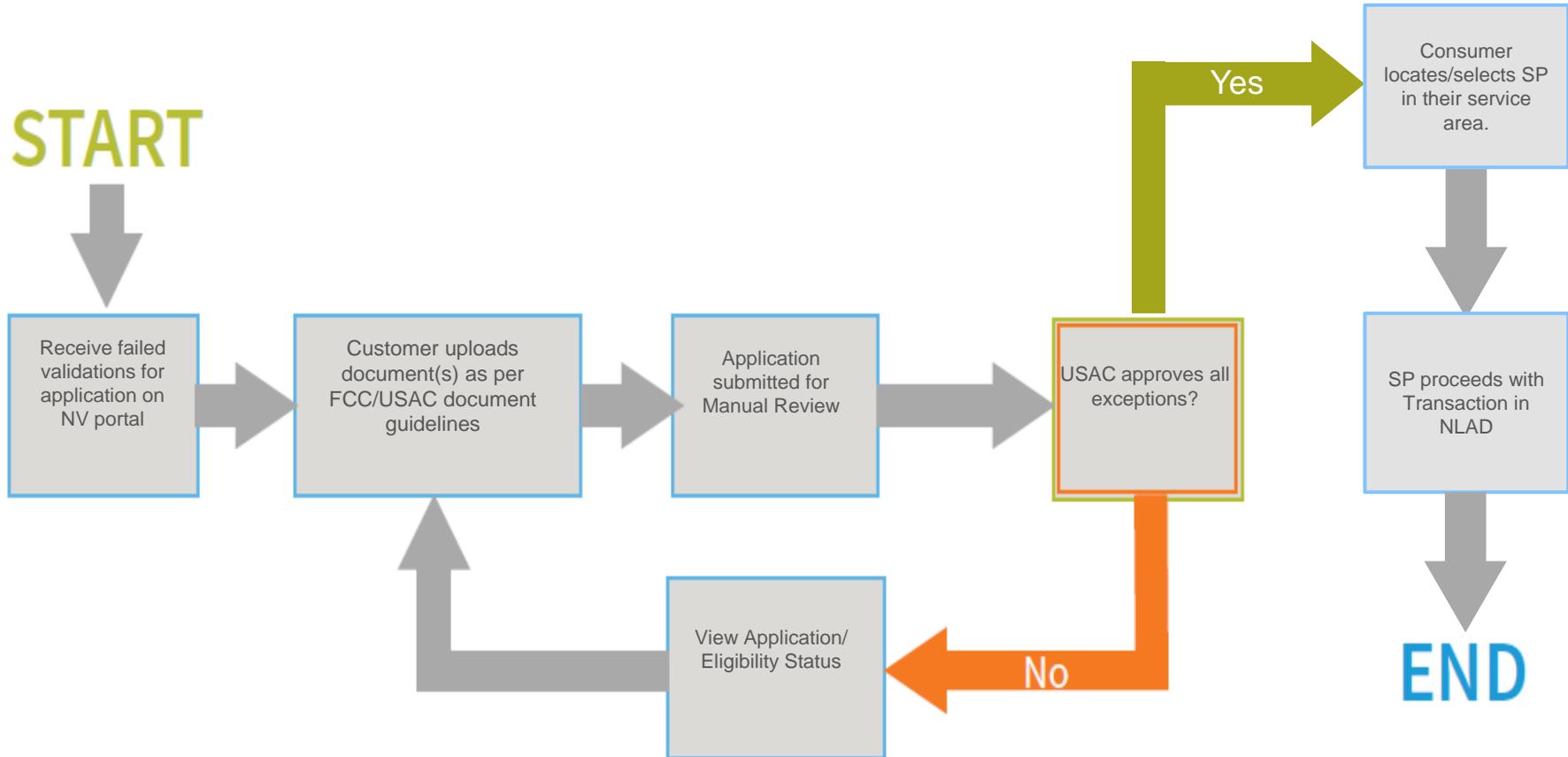
After submitting all of the required information, the system will return one of the following result types:

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

# Process Flow: Manual Review (Service Provider)



# Process Flow: Manual Review (Consumer)



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

## Before the National Verifier

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

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

## After the National Verifier

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

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

## Process Description: Error Types

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

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

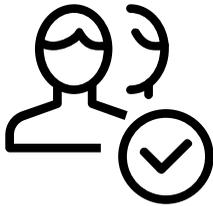
Error	Document Required
TPIV (Identity Verification Error)	Proof of identity
AMS (Address Verification Error)	Proof of residential address
Duplicate Address	Household Worksheet
Under 18	Proof of emancipated minor status
Program Eligibility	Proof of program/income eligibility
Deceased Subscriber	Proof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

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

## Process Description: Document Submission

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

1



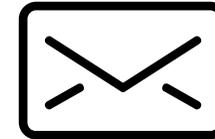
Submit documentation with assistance **from a service provider.**

2



Upload documentation **via the NV Web Portal.**

3



Send in documentation **via mail.**

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

## Process Description: Document Submission Results

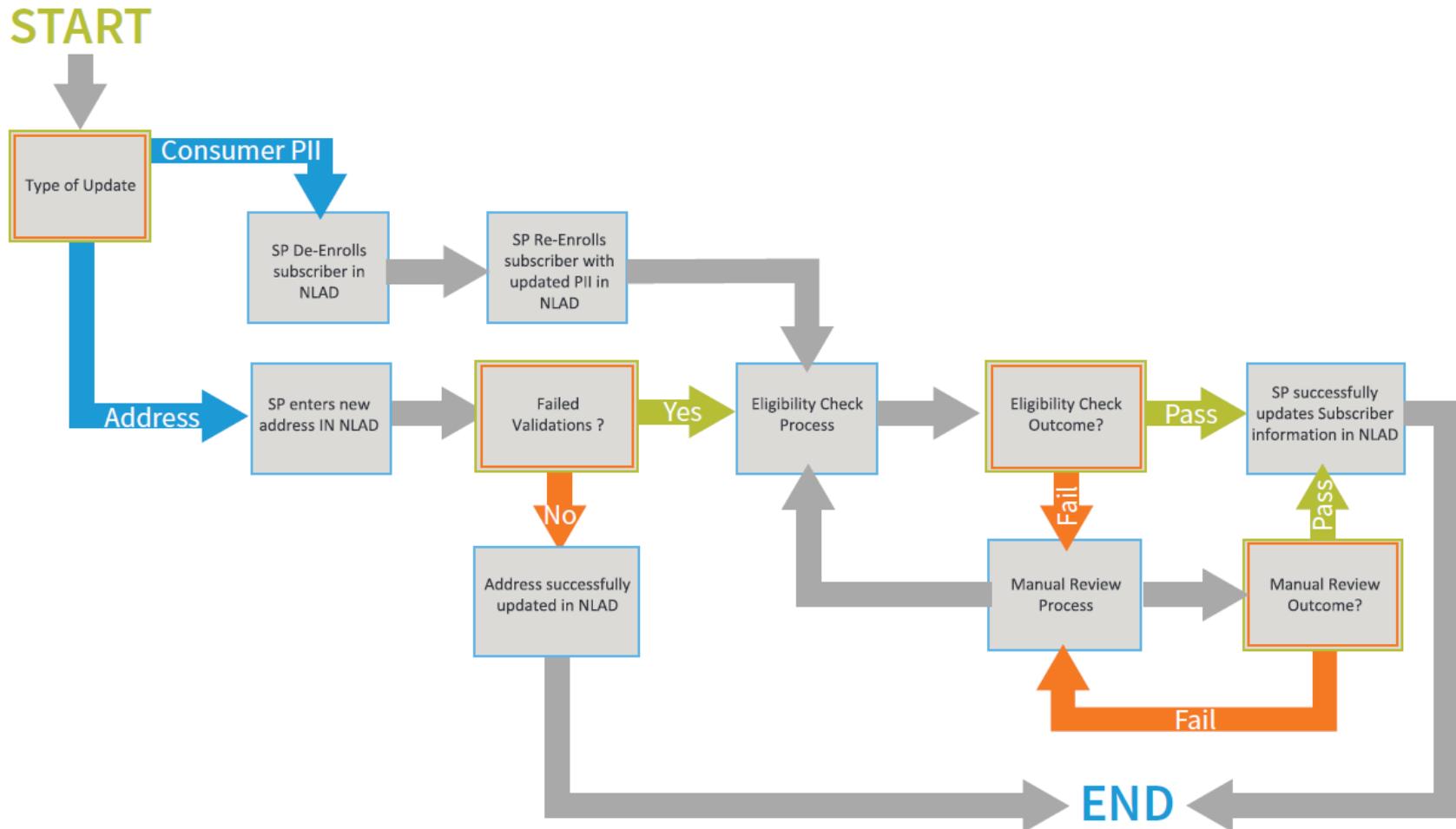
**After the service provider or consumer uploads all required supporting documents for manual review, the NV will display a confirmation message to confirm that USAC is reviewing the application to verify the consumer's eligibility to receive Lifeline support.**

- If the eligibility check was initiated through a service provider via the SP portal or Eligibility Check API, the service provider can also assist the consumer in checking their eligibility status. Result types are available on slide 40 in the Eligibility Check section. If the consumer is eligible, the service provider will see their updated eligibility status.
- If the eligibility check was initiated by a consumer, their status will be provided to them by mail, email, and/or on the consumer portal (depending on their preferred method of contact).

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

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

# Process Flow: Consumer Information Updates



## Process Description: Consumer Information Updates

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

**Under the Current Process, a Service Provider can only update a Subscriber's address in NLAD.**

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

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

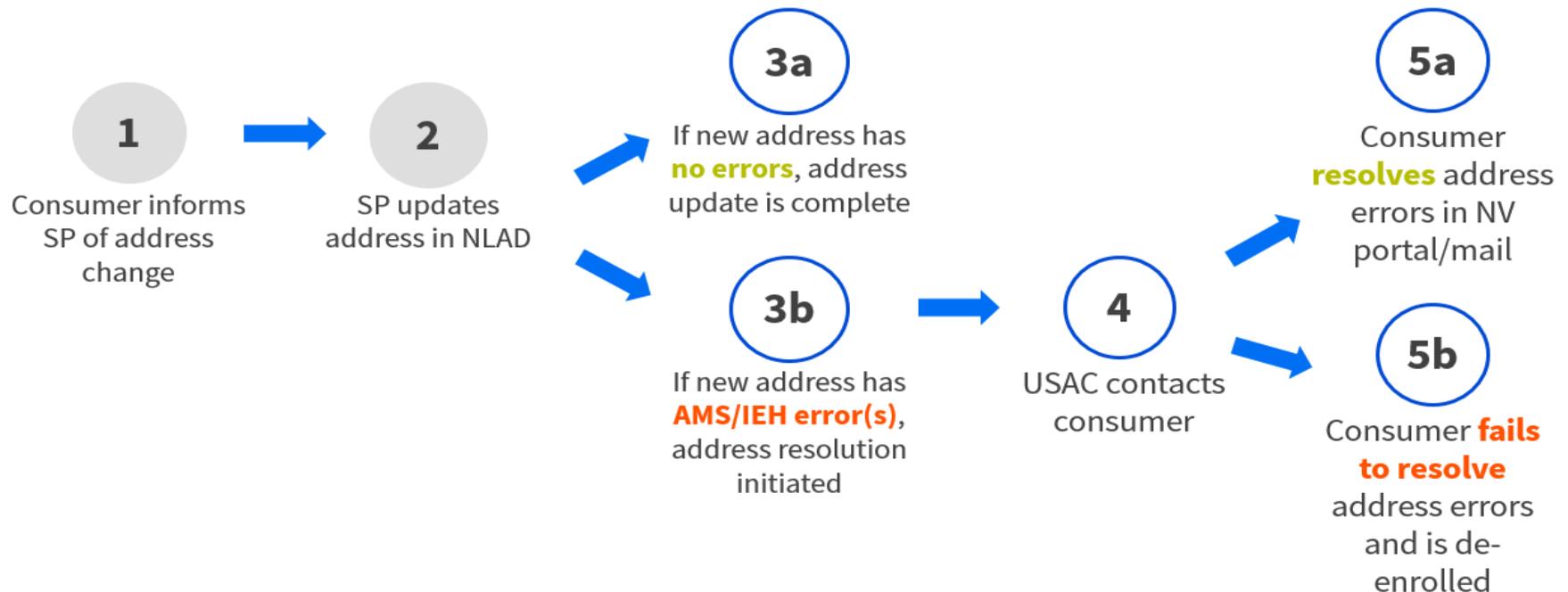
**The service provider must first de-enroll the subscriber from NLAD and then re-enroll with the corrected PII. When this happens, NLAD will check LED for a qualified application.**

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

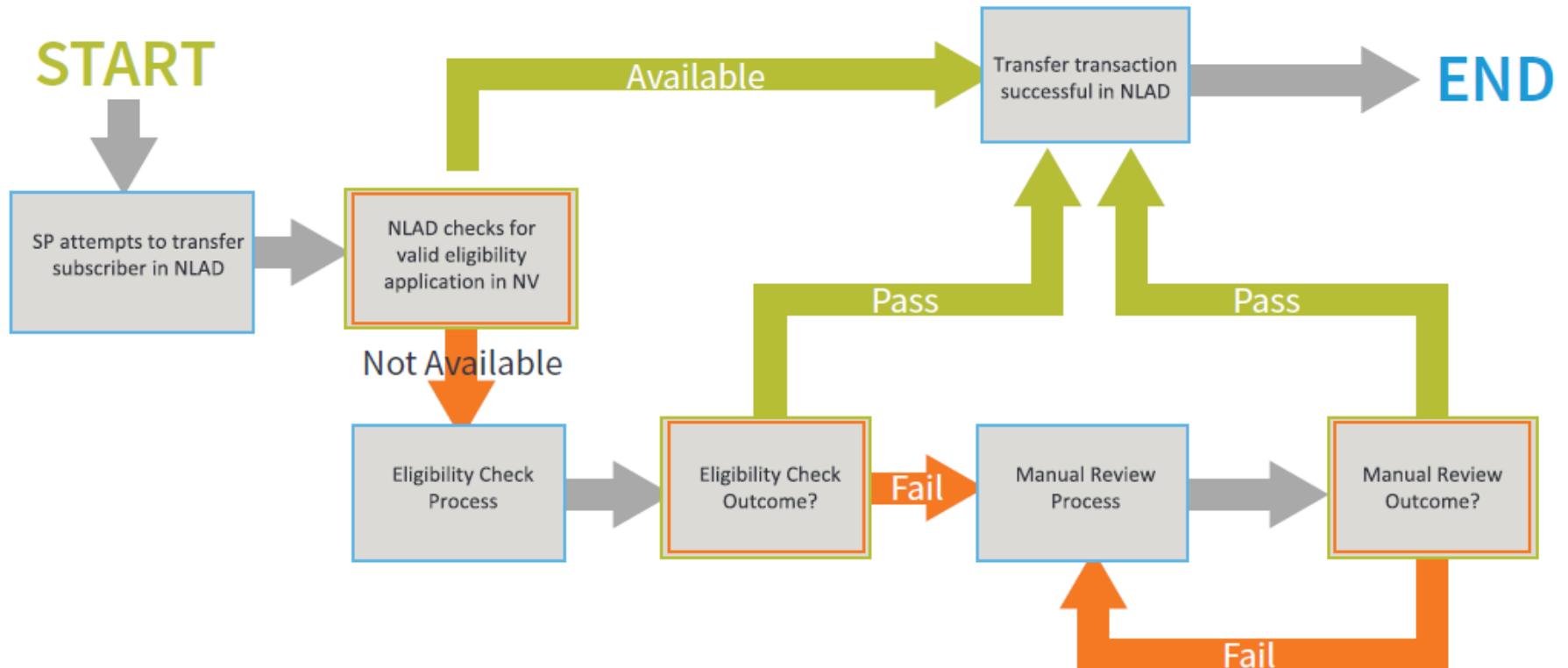
## Process Flow: Consumer Information Updates

USAC is planning to release a new updated consumer address workflow, which is expected to make the address error resolution process a lot more seamless. Please note that this release is tentative and contingent upon how the COVID-19 pandemic continues to evolve and will likely not take place until after COVID-19 waivers are lifted.

The graph below summarizes how the updated consumer address workflow will work:



# Process Flow: Benefit Transfer



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

## Before the National Verifier

New service provider representative initiates benefit transfer in NLAD

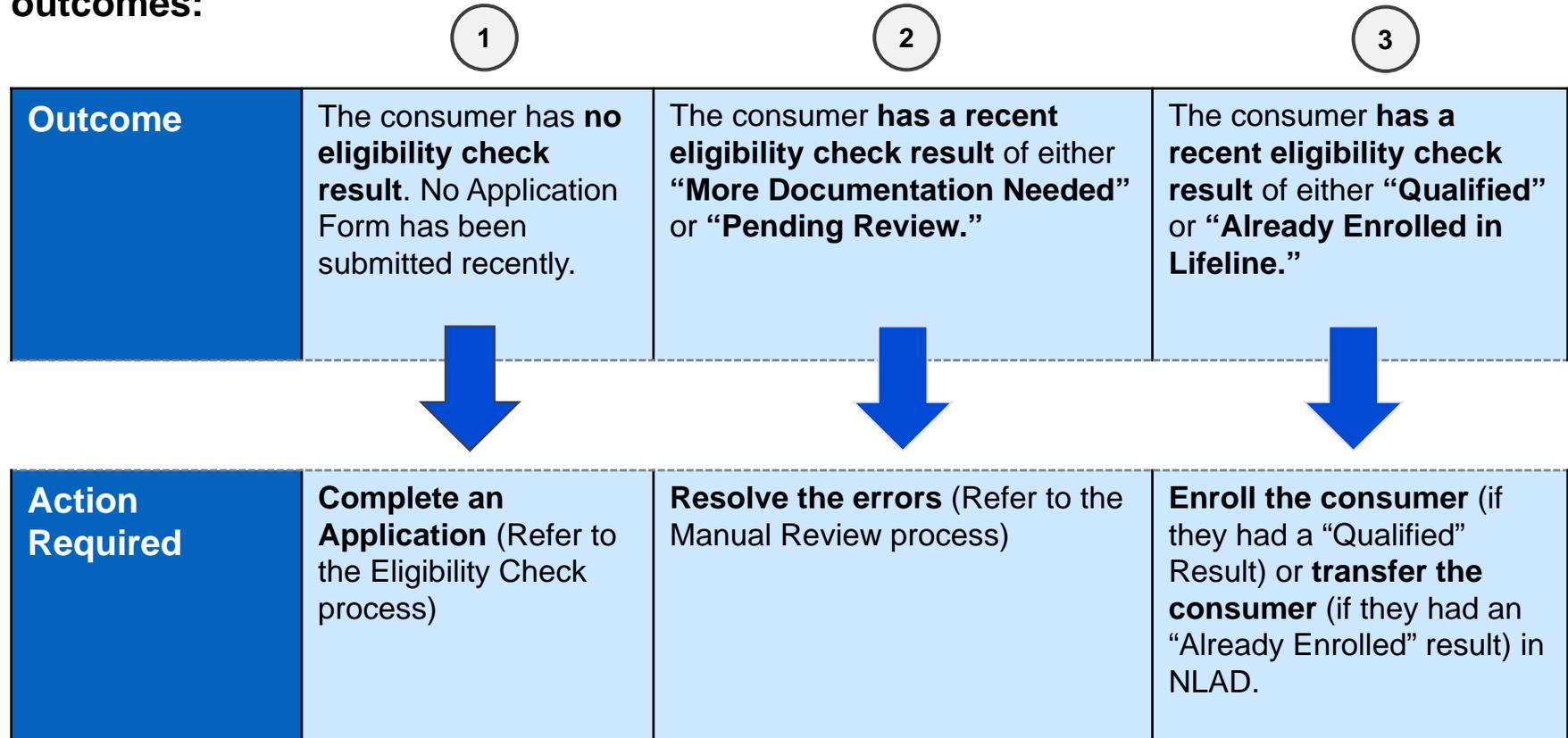
## After the National Verifier

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

## Process Description: Benefit Transfer

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

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



## Process Description: Benefit Transfer

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

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

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

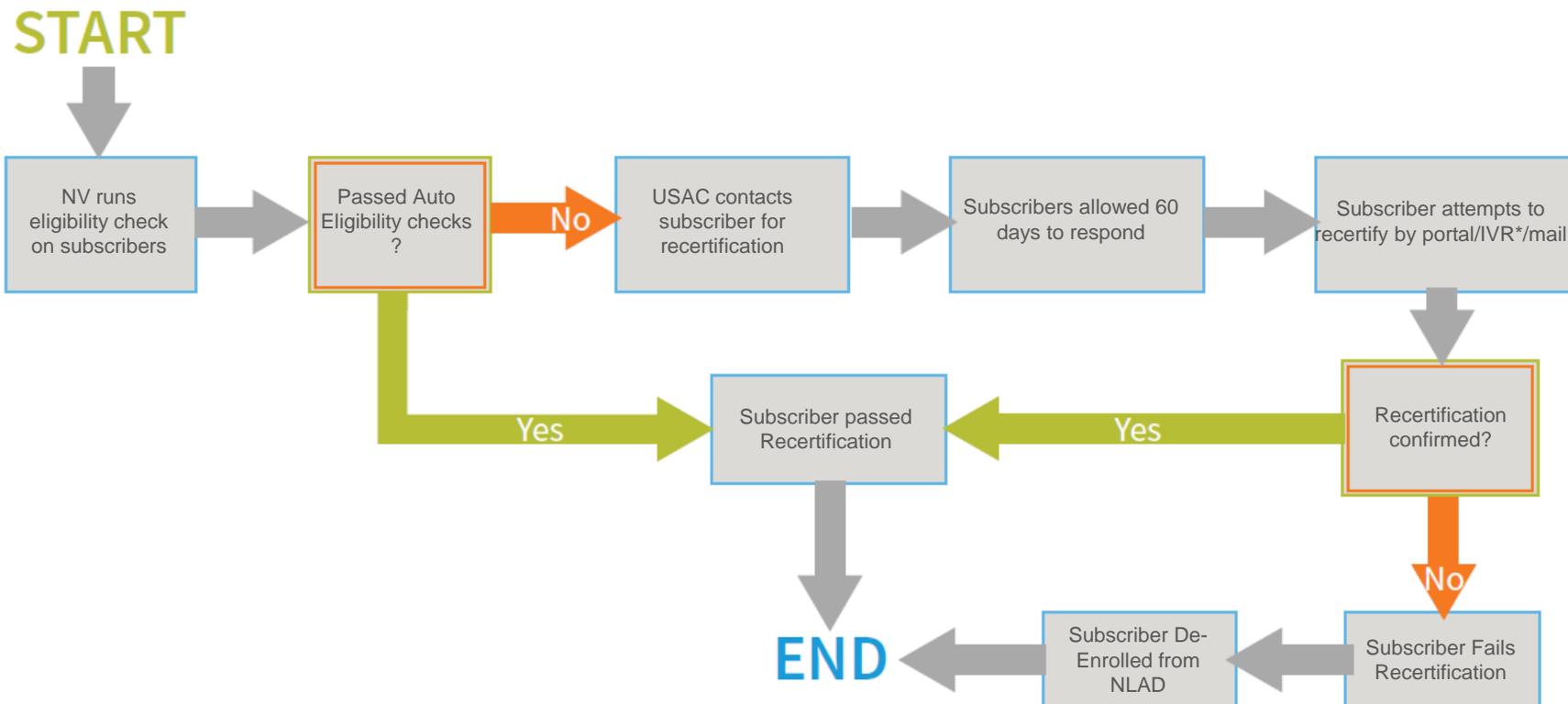
**Once the consumer has the “Already Enrolled in Lifeline” status, the service provider representative can perform the benefit transfer in NLAD. NLAD will:**

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

**The SP should notify the consumer of the outcome.**

## Process Flow: Recertification

**Rule change in effect as of October 13, 2020** - In the 2019 Lifeline Order, the FCC adopted changes to require additional supporting eligibility documentation during the annual recertification process. The new rules apply to subscribers who passed their previous automated eligibility database check, but have failed the automated check during the annual recertification.



\*IVR only available for subscribers who are not required to recertify via additional supporting documentation.

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

## Before the National Verifier

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

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

## After the National Verifier

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

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

## Process Description: Recertification (1/4)

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

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

The National Verifier will:

- Automate recertification via available state and federal data sources.
- Allow consumers the opportunity to manually recertify when they do not pass the automated recertification check.<sup>1</sup>
- Provide dynamic status reporting to service providers to track their customers' recertification results.

Consumers who do not pass the automated recertification check must go through official USAC manual recertification processes via the NV Web Portal, IVR, or mail.

<sup>1</sup> As of October 13, 2020, the 2019 Lifeline Order requires eligibility documentation to be collected in certain instances during annual recertification, which was previously not required.

## Process Description: Recertification (2/4)

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



1. Manually recertify directly  
**via the NV Web Portal.**



2. Manually recertify directly  
**via IVR.**



3. Manually recertify directly  
**via mail.**

# Process Description: Recertification (3/4)

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

Automated Recertification Check Occurs

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

Consumer's 60-day window to manually **recertify**

Consumer must manually **recertify** by this date

Consumer's Anniversary Date

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

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

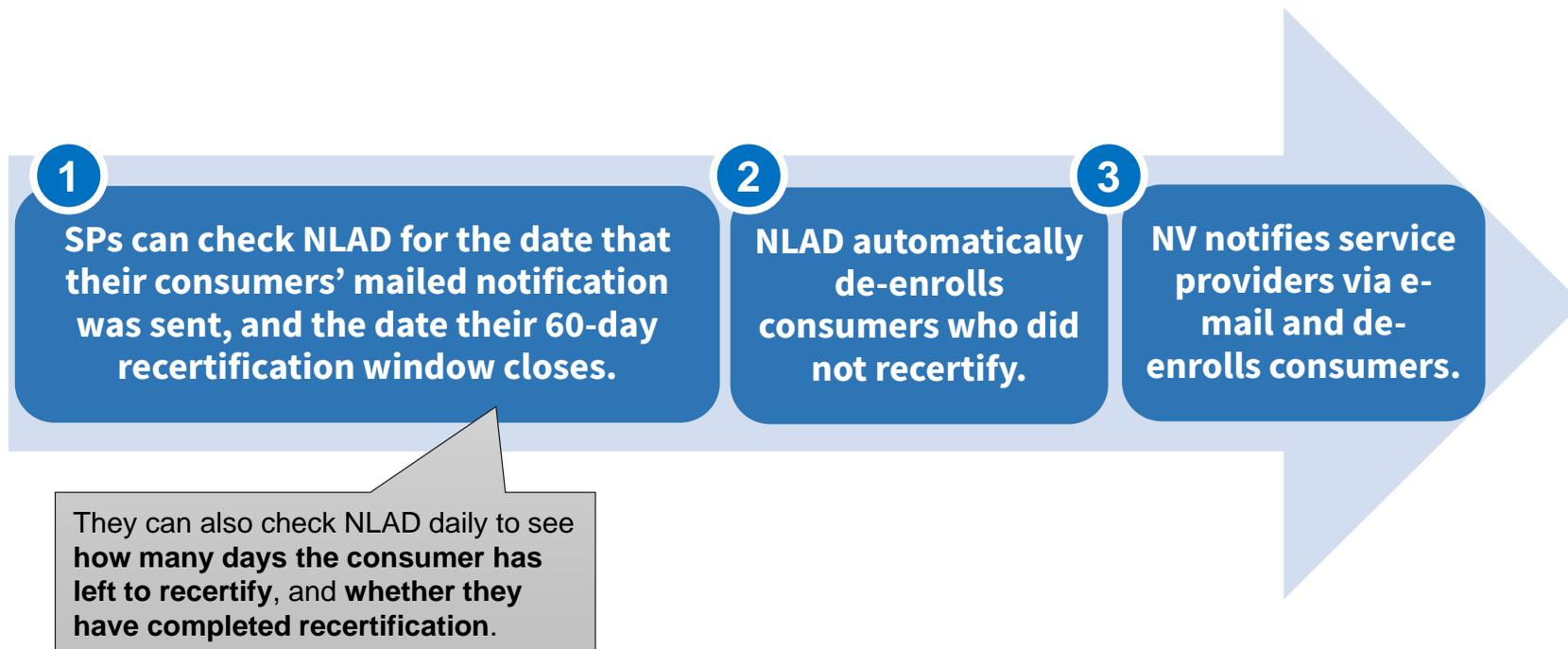
Second Month						
			1	2	3	4
5	6	7	8	9	10	11
12	13	14	15	16	17	18
19	20	21	22	23	24	25
26	27	28	29	30		

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

**Note: Dates are for illustrative purposes only**

## Process Description: Recertification (4/4)

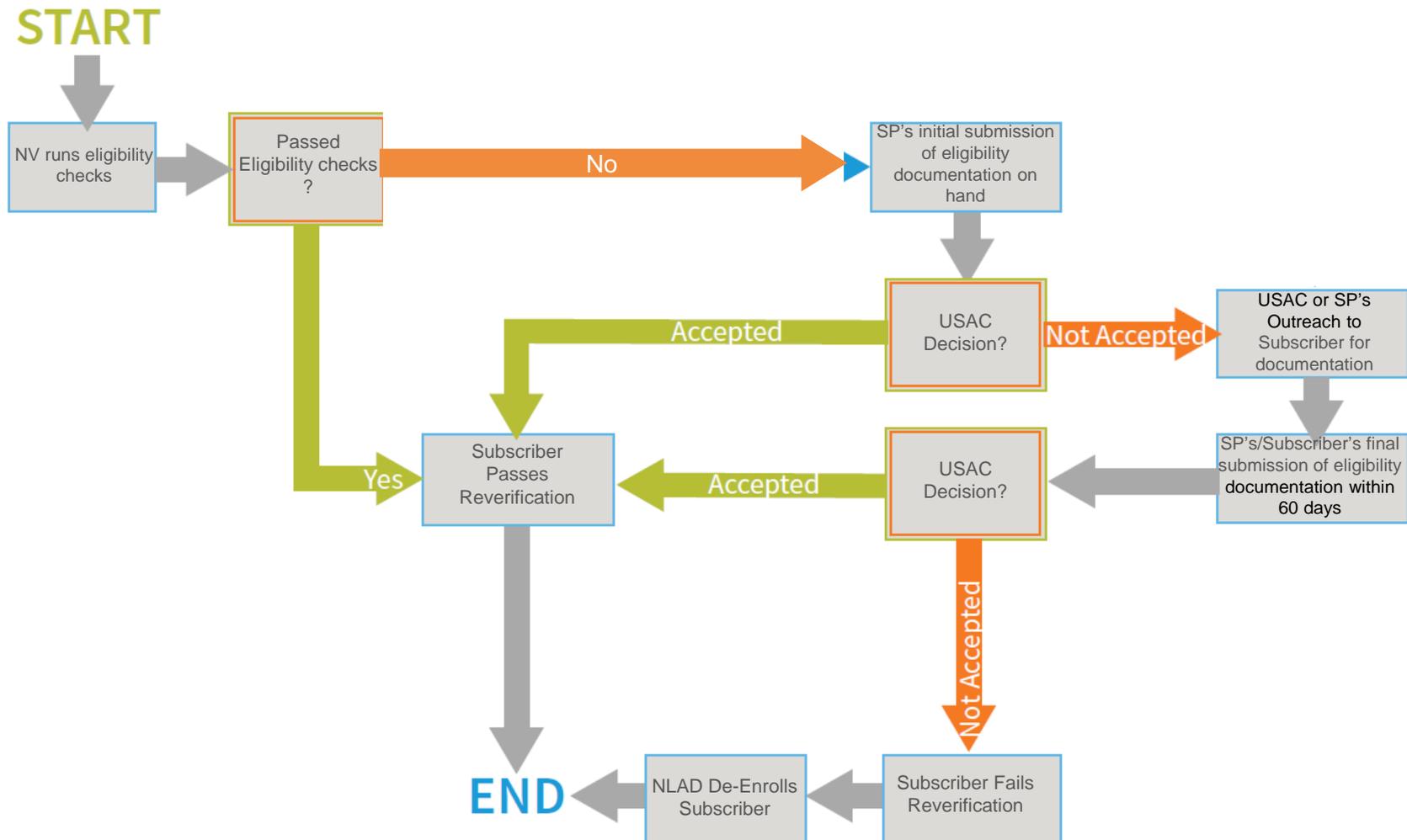
If consumers do not successfully manually recertify within 60 days of their Lifeline Support Center letter being sent, they will be automatically de-enrolled. NLAD will compile a list of consumers who did not recertify, de-enroll them, and notify the consumers and their respective service providers. The de-enrollment process is below <sup>1</sup>:



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

<sup>1</sup> De-enrollments are currently suspended until the current COVID-19 waivers expire.

# Process Flow: Reverification



## Process Description: Reverification (1/3)

**When the National Verifier launches in a state, the eligibility of all Lifeline subscribers in that state whose eligibility was previously determined by a service provider will be reverified.**

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

## Process Description: Reverification (2/3)

**Reverification is the one-time process to confirm that all existing Lifeline subscribers whose eligibility was previously determined by a service provider meet the National Verifier's eligibility standards.**

**Reverification is different from annual recertification.**

### Main differences:

- Reverification happens once, when the National Verifier launches in a state.
- Reverification must be completed for all existing subscribers for which service providers determined eligibility; it is not related to when the subscriber last recertified.
- Reverification resets the subscriber's anniversary date and fulfills the annual recertification requirements.
- USAC has completed reverification of 98% of subscribers in the first five launch groups as of January 2020 with an 84% average success rate.

## Process Description: Reverification (3/3)

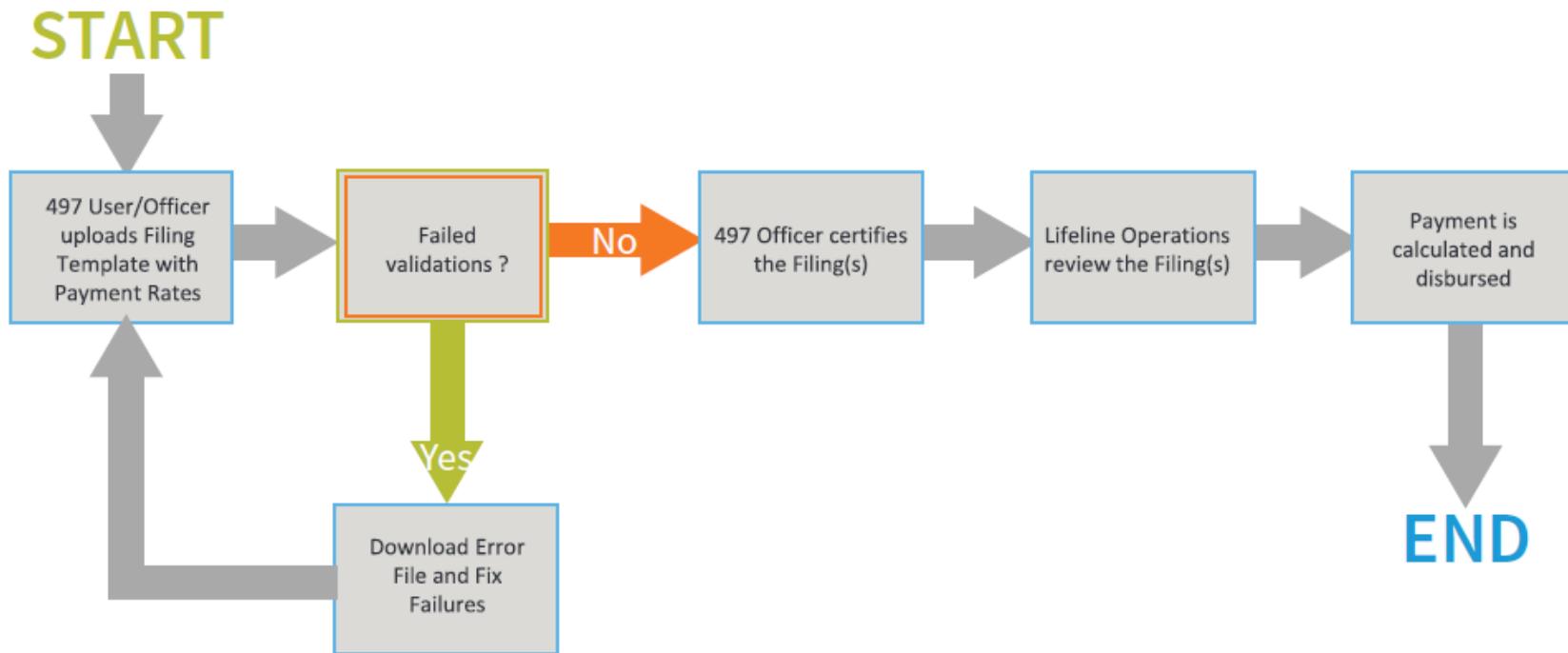
**USAC reverifies subscribers in four groups, based on their Lifeline enrollment date:**

- **Group 1:** Subscribers recently enrolled (date will vary by launch) at the time of soft launch.
- **Groups 2 & 3:** Subscribers enrolled prior to the Group 1 cut-off date.
- **Group 4:** Subscribers enrolled through the legacy process during the soft launch period.
- For groups 1 and 4, documentation collected by service providers at enrollment may be accepted. For groups 2 & 3, only errors unrelated to eligibility (e.g., AMS, IEH, etc.) can be resolved using existing documentation. USAC gives service providers 45 days to submit on-hand documentation.
- After collecting any documentation the service provider has on hand, USAC will conduct consumer outreach to collect updated/recent eligibility documentation, as needed.<sup>1</sup> USAC gives subscribers 60 days to submit documentation.

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

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

## Process Flow: Claims and Disbursements



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

## Process Description: Claims and Disbursements

### What is new about this process:

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

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

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

- (1) Download a report of subscribers eligible for reimbursement from NLAD.
- (2) Add the dollar amount for subscribers being claimed (or reason code for subscribers being unclaimed), before certifying/submitting the filing for processing.
- (3) From January 2018 until January 2021, carriers in NLAD opt-out states submitted a file containing the required data to USAC for reimbursement purposes. As of January 2021, carriers in NLAD opt-out states submit their claims based on a report of subscribers that are eligible for reimbursement provided directly to USAC by state commissions.

### What remains the same:

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

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

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

**Service providers to receive reimbursement in the same month if claim is certified by the 8<sup>th</sup> of the month.**

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

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

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## Success Metrics: Executive Summary

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

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

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

**Thus far, we have identified four primary key performance indicators (KPIs) to track. (KPIs are listed on slide 69.)**

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

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

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

## 1 Stronger Program Integrity

## 2 Enhanced Consumer Experience

## 3 Cost Effectiveness

GOALS

**Protect against and reduce fraud, waste and abuse**

- Increase accountability of Lifeline program; and
- Reduce payments for ineligible subscribers.

**Improve consumer experience in the enrollment process**

- Streamline consumer application channels;
- Provide consumer support; and
- Reduce complexity.

**Lower costs through increasing administrative efficiencies**

- Provide automated eligibility verification; and
- Streamline processes for enrollment, recertification, & reimbursement to SPs.

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

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

## Key Metrics and KPI Matrix

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

	KPI/Metric	Program Integrity	Consumer Experience	Cost Effectiveness
1	<b>Automated Program Eligibility %</b>	✓	✓	✓
2	<b>System Uptime</b>	✓	✓	✓
3	<b>Manual Review Processing Time</b>		✓	✓
4	<b>Customer Satisfaction / 1<sup>st</sup> Call Resolution</b>			✓

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

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## User Support: Executive Summary

**Proactively engaging key stakeholders is critical to the success of the National Verifier.**

Stakeholder feedback helps USAC understand the implications of the decisions we make for those who interact with the National Verifier regularly.

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

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

**To best assist consumers and those supporting consumers, USAC has implemented detailed outreach which includes:**

- Educational one-pagers for consumers
- A Tribal specific flyer and toolkit for Tribal communities
- Continuous enhancements to the consumer-facing website based on feedback from stakeholders
- Continuous revisions to mailed outreach for consumers to improve readability
- Consumer advocate and Tribal consumer advocate webinars to help entities with shared Lifeline consumers assist Lifeline eligible consumers successfully navigate the program
- Improvements to consumer videos

**USAC will continue to engage stakeholders through:**

- Webinars
- Outreach calls
- Educational content

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

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

These materials are available on [USAC's learning page](#) and LifelineSupport.org

# Stakeholders can contact USAC through multiple avenues

## Dedicated Support Sessions

- USAC holds regular support sessions.
- These sessions are hosted live on GoToWebinar, and USAC answers questions and collects user feedback.
- USAC has created targeted training for service providers, consumer advocates, and Tribal consumer advocates to ensure all partners have the tools they need to support consumers.

## Lifeline Support Center Accessibility

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

## USAC provides training and support sessions

**USAC gathers feedback from National Verifier users to refine and update training and support sessions.**

**Training and support includes:**

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

These trainings include launch-specific information, including reverification, as well as how to complete common transactions such as eligibility checks and document submission. Training materials are posted on USAC's website after training sessions.

**USAC also engages stakeholders through:**

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

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## Privacy and information security: Executive Summary

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

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

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

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

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

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

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

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

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

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

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

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

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

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

### Information provided by subscribers

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

Fields typically transmitted to query eligibility sources

### Data generated through National Verifier processes

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

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## USAC response to Frequently Asked Questions (1/4)

### FAQ

What are the functions of the National Verifier system?

The National Verifier system:

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

How can service providers access the NV Web Portal?

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

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

Is the NV Web Portal available in Spanish?

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

## USAC response to Frequently Asked Questions (2/4)

### FAQ

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

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

When do consumers need to provide documentation?

### USAC response

The National Verifier enables consumers, service providers, and state agencies assisting them, to apply for Lifeline by checking their eligibility. Consumers must be eligible for Lifeline and receive a "Qualified" status before they then can be enrolled in Lifeline.

The NV cannot be used to enroll consumers in Lifeline; enrollments must occur in NLAD.

A consumer can apply or check their eligibility for Lifeline with the assistance of a service provider or state agency via the service provider NV Web Portal or Eligibility Check API, the consumer NV Web Portal or a paper application submitted via mail to the Lifeline Support Center.

When consumers apply, there is a possibility that the NV will be able to verify their eligibility automatically (if they are qualifying through a program that has an automated data source) and no additional documentation will be needed to validate a consumer's eligibility.

If there are errors associated with a consumer's application, they will need to provide additional documentation to resolve the errors in order to eventually receive a "Qualified" eligibility status. In addition, if the consumer is qualifying through a program that cannot be checked using an automated data source, the consumer will need to provide documentation so that their eligibility can be checked manually.

## USAC response to Frequently Asked Questions (3/4)

### FAQ

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

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

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

### USAC response

All consumers state users, or service provider representatives using the NV web portal must have their own individual accounts. No one is allowed to share accounts with another person.

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

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

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

If a consumer qualifies via the consumer NV web portal, they will be taken to a “Qualified” screen which will provide instructions to enroll with a carrier. Like with paper applications, the consumer will need to contact a participating Lifeline service provider to be enrolled into NLAD to receive the Lifeline benefit. A direct link to Lifeline’s Companies Near Me tool will appear on the “Qualified” screen so consumers can easily navigate to this tool and find companies that serve their area.

## USAC response to Frequently Asked Questions (4/4)

### FAQ

Can other stakeholders besides service providers access the service provider portal to assist consumers with the application process?

How does the National Verifier work in CA, OR, and TX (NLAD Opt-Out States)?

### USAC response

- State agencies such as state public commissions, state departments of health and human services, and social service agencies, may access the service provider portal to help consumers submit online applications, upload eligibility or other documentation (as needed), and track the status of applications.
- The National Verifier relies on existing state eligibility verification processes in these three states, using state eligibility data to validate service provider claims for support and reviewing state eligibility determinations to ensure compliance with FCC rules. Consumers should continue to sign up for federal and state Lifeline support using the states' application process, except for standalone broadband subscribers in California. Consumers in CA that wish to sign up for standalone-broadband service should work directly with their service provider to apply through the National Verifier.

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## Glossary (1/3)

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

## Glossary (2/3)

Term	Definition	Explanation
ISA	Interconnection Security Agreement	A formal agreement between two parties to establish protocols and standards that govern the handling of any data transferred between the parties and the technical requirements and security components of the interconnections between IT systems.
RAD	Representative Accountability Database	RAD was created to allow USAC to monitor a representative's transactions in NLAD and the National Verifier. Representatives register for a Representative ID through RAD and then provide that Representative ID to the service providers for which they perform Lifeline transactions.
Recertification	Annual eligibility check	Each year, a consumer must complete recertification to confirm they are still eligible for the Lifeline benefit. If their eligibility is not confirmed via an automated data check, USAC will ask the consumer for information to verify their eligibility.
Reverification	One-time eligibility check	When the National Verifier launches in a state, all existing Lifeline subscribers whose eligibility was previously determined by a service provider go through a one-time process to verify they meet the National Verifier's eligibility standards.
SI	Systems Integrator	A company that specializes in integrating multiple component subsystems or parts into a single system.
System of Records	System of Records	A group of records under control of any federal agency from which information is retrieved by the name of the individual or by some identifying number, symbol, or other identifying particular assigned to the individual.
SP	Service Provider	A telecommunications company that provides service (i.e., wireline voice, wireless voice, wireline broadband, wireless broadband) to consumers.

## Glossary (3/3)

Term	Definition	Explanation
States	States, territories, and Tribal lands	50 U.S. States + DC, Puerto Rico, Guam, U.S. Virgin Islands, Northern Mariana Islands, American Samoa, and federally-recognized Tribal lands.
TPIV	Third party identity verification	A service that verifies the existence of a person who corresponds to the PII submitted by an applicant by using public and private records (e.g., birth certificates, real estate ownership, credit history).
UI/UX	User Interface / User Experience	The components of a system with which humans interact, as well as the actual experience of an end user's interaction with the system.
USAC	The Universal Service Administrative Company	A non-profit corporation designated by the Federal Communications Commission (FCC) as the permanent administrator of the Universal Service Fund (USF), which includes the Lifeline program.
USF	Universal Service Fund	A fund, established by the Telecommunications Act of 1996, whose goal is to ensure that every American has access to vital telecommunications services; the Lifeline program is a component of the USF.