Rural Tribal Waiver Training

June 2020
Housekeeping

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  - There is a large audience signed in today. We will accept as many questions as possible!
- If your audio or slides freeze, restart the webinar
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Today’s Presenters

Catie Miller
Leah Sorini
Delante Cherry
Agenda

1. Introduction
2. Application Process
3. Enrollment
4. Lifeline Service Claims
Introduction to Tribal Waiver

Changes in Response to COVID-19 Pandemic
Introduction

• The FCC issued an order on June 1, 2020 to make it easier for those who reside in rural areas on Tribal lands to enroll in the Lifeline program during the COVID-19 pandemic.

• In times of social distancing, access to affordable communications services for low-income households is more important than ever, especially for consumers residing in rural areas on Tribal lands.

• This training will cover the waiver, application process, and enrollment in compliance with this waiver.
Introduction: Modifications Under Waiver

Through **August 31, 2020**, carriers have the option to allow eligible consumers living in rural areas on Tribal lands to enroll in Lifeline without immediately satisfying any or all of the documentation requirements for any errors in their application such as:

- AMS (address),
- IEH (one-per-household),
- TPIV (identity), or
- Program/income eligibility.
Introduction: Qualifying for the Benefit

• Consumers must enroll for Lifeline through their service provider to benefit from this waiver. Service providers may choose to voluntarily offer the application flexibility authorized by this waiver.

• This waiver applies only to consumers who reside in rural areas on, Tribal lands.

• Consumers who enroll through this waiver process will have 45 days to provide the required documentation after sign up.

• Carriers cannot claim reimbursement for these consumers until they have successfully qualified for the benefit through the National Verifier.
Questions?
Application Process
Application Process: Before You Get Started

- This waiver applies only to consumers who reside in rural areas on Tribal lands.
- Service providers must confirm the consumer lives in a rural area on Tribal lands prior to starting this process.
- Use the NLAD Tribal Lands Eligibility Verification mapping tool or other method to confirm a consumer’s eligibility for the waiver.
Application Process: Rural Tribal Waiver

Consumer applies using the standard National Verifier application process.

If the consumer receives a qualified result in the National Verifier initially:

- The consumer will not need to use the waiver process.
- The service provider should enroll the consumer in NLAD as normal.

If the consumer is unable to qualify in the National Verifier:

- The service provider should enroll the consumer through the legacy process in NLAD
- Consumers have 45 days to provide the required documentation before their application expires.
- Documentation needs to be mailed to Lifeline Support or uploaded in the National Verifier.

* This process differs for consumers living on Rural Tribal Lands in California and Texas
Enrollment
With the Legacy Process
Enrollment Process

- For consumers in rural areas on Tribal lands who are **unable** to automatically qualify in the National Verifier:
  - The NLAD legacy enrollment process should be used to enroll them.
- This allows consumers to be enrolled in NLAD even though they have yet to qualify through the National Verifier.
Enrollment Process

• To enroll a consumer who lives in a rural area on Tribal lands using the legacy NLAD enrollment process:
  • Turn the National Verifier Mode off, and
  • Complete the enrollment transaction as you would have prior to the National Verifier.
**Enrollment Process: Turn Off NV**

**How to Turn Off the National Verifier Mode:**

- Navigate to the top of the Enroll Subscriber page and locate the National Verifier button in the top right corner, just underneath the "LOG OUT" option.
- If National Verifier Mode is ON, click on the blue button to turn it off.
Enrollment Process: Turn Off NV

**WARNING:**

- Enrolling a Tribal consumer through the legacy process starts a 45-day clock for the consumer to qualify in the National Verifier through submission of required documentation.

- The consumer must qualify for the benefit **and** the service provider **must** conduct a de-enroll/re-enroll to ensure the consumer retains the benefit beyond the initial 45 days.
Enrollment Process: Resolve Errors

<table>
<thead>
<tr>
<th>Error</th>
<th>Resolution</th>
</tr>
</thead>
<tbody>
<tr>
<td>AMS (Address Matching Service Error)</td>
<td>Non-Deliverable Address Validation/Tribal Address Flag</td>
</tr>
<tr>
<td>Duplicate Address</td>
<td>Independent Economic Household Flag</td>
</tr>
<tr>
<td>Duplicate Subscriber Error</td>
<td>Collect Documentation in Order to Dispute</td>
</tr>
<tr>
<td>TPIV (Identity Verification Error)</td>
<td>Dispute Resolution Request Utilizing New “T23” Code</td>
</tr>
</tbody>
</table>
Enrollment Process: Final Steps

• Consumers who are enrolled through the NLAD legacy process and receive service remain in NLAD for up to 45 days.
  • These consumers cannot be claimed in LCS until they qualify in the National Verifier.

• If the consumer completes their National Verifier application and qualifies:
  • The service provider must de-enroll the original legacy enrollment and re-enroll through the NV-mode in NLAD.

• If, after 45 days, the consumer is still in NLAD through the legacy enrollment, USAC will de-enroll the subscriber from NLAD.
Questions?
Lifeline Service Claims

Claiming Subscribers
Lifeline Service Claims – Information for Providers

• Service providers will **not** be able to claim support for service provided until after the subscriber has qualified through the National Verifier.

• Consumers enrolled through this legacy process will appear on your snapshot report, but a reason code must be provided for any subscriber that has not qualified through the NV yet.

• Use reason code “U6” in the LCS system to indicate why the subscriber is not being claimed.

• Once the subscriber is fully qualified, service providers will have an opportunity to revise up for service provided, dating back to the day service began up to the day of qualification, not to exceed 45 days.
Lifeline Service Claims - Example

Here is an example of how you would make a claim in LCS if the consumer qualifies within 45 days:

- June 15th – Legacy enrollment in NLAD
- July 1st – The consumer appears on July 1 snapshot (June data month)
  - Carrier cannot claim support for consumer and should use the “U6” reason code
- July 25th – Consumer qualifies through the NV (40 days after enrollment)
  - Carrier can go back and upward revise claim for June data month (July 1 snapshot) for this subscriber
Questions?
Resolving AMS Errors
For Consumers on Tribal Lands
A Note on Address Errors
Resolving AMS Errors Online

• If a consumer entered a descriptive address or another address that cannot be verified, they will need to provide more information using this mapping tool.
• The map will try to locate the consumer’s home based on the information originally entered.
  • The latitude and longitude fields will automatically populate.
• The consumer can move the pin around to locate where they live.
• Dropping a pin or providing coordinates is crucial for those who reside on Tribal lands.
A Note on Address Errors
Resolving AMS Errors on Paper

**Option 1:** If a consumer has access to the internet but does not want to submit an online application, USAC recommends that they use a mapping tool (such as Google maps) to drop a pin where they live.

- Consumers may take a screenshot of the mapping tool (the image should include the dropped pin and the consumer’s latitude and longitude coordinates)
A Note on Address Errors
Resolving AMS Errors on Paper

Option 2: A consumer may use a map from their community (i.e., from a gas station or if their phone/internet company or Tribal government has maps of the area)

• The consumer must circle the location of their home

• If coordinates are known, the consumer should write them on the map (otherwise, USAC will determine coordinates based on the map)
A Note on Address Errors
Resolving AMS Errors on Paper

**Option 3:** Consumers may hand draw a map to show where they live

- This map should include **cross roads, identifiable landmarks, and distances**
- If coordinates are known, the consumer should write them on the map (otherwise, USAC will determine coordinates based on the map)
Questions?
Thank You!

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