RAD 101

Wednesday, February 12, 2020

Universal Service
Administrative Co.

Housekeeping

- Audio is available through your computer's speakers
- The audience will remain on mute
- Enter questions at any time using the "Questions" box
  - 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
- Copy of the slide deck in the "handouts" section of webinar panel

Today’s Presenters

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Agenda

1. The 2019 Lifeline Order
2. About RAD
3. Timeline
4. Registration
5. Link Accounts
6. FAQs
7. Resources

The 2019 Lifeline Order

Fifth Report and Order

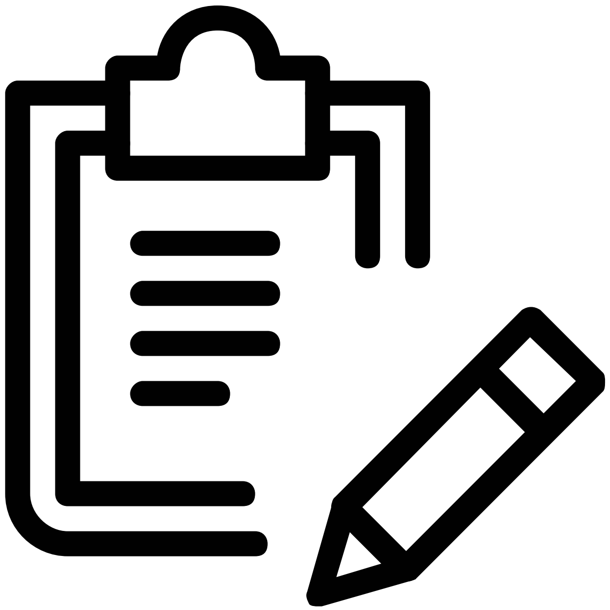
The 2019 Lifeline Order
Summary

- The Lifeline Fifth Report and Order was published in the Federal Register on December 27, 2019
- The order focused on strengthening program enrollment, recertification, and reimbursement processes
- It also increases data transparency, resolves several open petitions, and seeks comment on additional measures to combat waste, fraud, and abuse

The 2019 Lifeline Order
Summary

- The recent FCC order makes several changes or codifies practices to strengthen program integrity

- The Order:
  - Prohibits ETCs from offering or providing commissions based on the number of consumers who apply for or are enrolled in Lifeline
  - Requires eligibility documentation to be collected in certain instances during annual recertification
  - Codifies the creation of the Representative Accountability Database (RAD)



Announcements
Fifth Report and Order

Date	Change	Change Description
January 27	Lifeline Fifth Report and Order	Date the Order became effective.
January 27	Designation of Eligible telecommunications carriers (ETCs)	The Order eliminates the Lifeline Broadband Provider (LBP) ETC category and the FCC designation process for LBPs. Companies should continue to seek ETC designation from their states or the FCC if the state lacks jurisdiction.
January 27	Independent Economic Household (IEH) field	The order prohibits Lifeline providers from selecting the independent economic household (IEH) field in NLAD unless NLAD has indicated there is a shared address. USAC will monitor and correct any erroneous entries.
February 25	Elimination of Commissions	Providers may not pay commission on Lifeline enrollments to their enrollment representatives. Providers may pay out any commissions earned through February 24th.
March 26	Representative Accountability Database (RAD)	RAD will no longer be voluntary and will function as designed and communicated prior to the Order, with minor exceptions noted in this webinar.
TBD *	Annual Recertification	ETCs will now be required to collect eligibility documentation from a subscriber when that subscriber's eligibility was previously determined through an eligibility database, but at the time of recertification, the subscriber's eligibility cannot be confirmed through a database check. This was not previously required.
TBD **	Biennial Audits	ETCs that must complete the audits will be selected using risk-based factors, rather than the level of Lifeline disbursements.

*90 days after announcement of Office of Management and Budget approval under the Paperwork Reduction Act.

** As in the past, those selected for biennial audits will undergo USAC provided training and have access to subject matter experts throughout the process.

About RAD

RAD 101

About RAD

The Representative Accountability Database (RAD) was created to allow USAC to track a representative's transactions in NLAD and the National Verifier.

- Representatives register for a Representative ID (Rep ID) through RAD
- A Rep ID is used during transactions like eligibility checks and enrollments
- USAC will use the data gathered to improve program integrity by monitoring for potentially fraudulent activity
- USAC may lock a user's account if it suspects the user is engaging in potentially fraudulent activity

About RAD
Representative ID

- A key component of RAD is the **Rep ID**:
  - A Rep ID is a unique ID provided to representatives after their identity is verified by USAC through RAD
  - Representatives only have **one** Representative ID, even if they work for multiple service providers
  - A representative needs to have their account linked to **all** service providers for whom they work
  - Service providers do **not have a limit** to how many representatives are linked to their company

About RAD
Who Needs to Register

Service Provider Role	RAD Impact
Form 497 Officer	• Does **not** need Rep ID • Responsible for linking ETC Admins' Rep IDs to their accounts
ETC Administrator	• Needs Rep ID if responsible for eligibility checks, enrollments, etc. • Responsible for linking Rep IDs to subaccounts, including API accounts
Subaccount holder (ETC Analysts, ETC Operations, and ETC Agents)	• Needs Rep ID if responsible for eligibility checks, enrollments, etc.
Anyone who performs enrollments, updates, recertification, etc.	• Needs Rep ID
Master Agent (Individuals that contract directly with ETCs and oversee or manage a team of people working to complete Lifeline enrollments)	• Needs Rep ID
API account managers/technical teams	• Needs to prepare for changes to API requests/batch file template • Plan to include Rep ID on eligibility checks, enrollments, and other transactions performed by API/batch upload

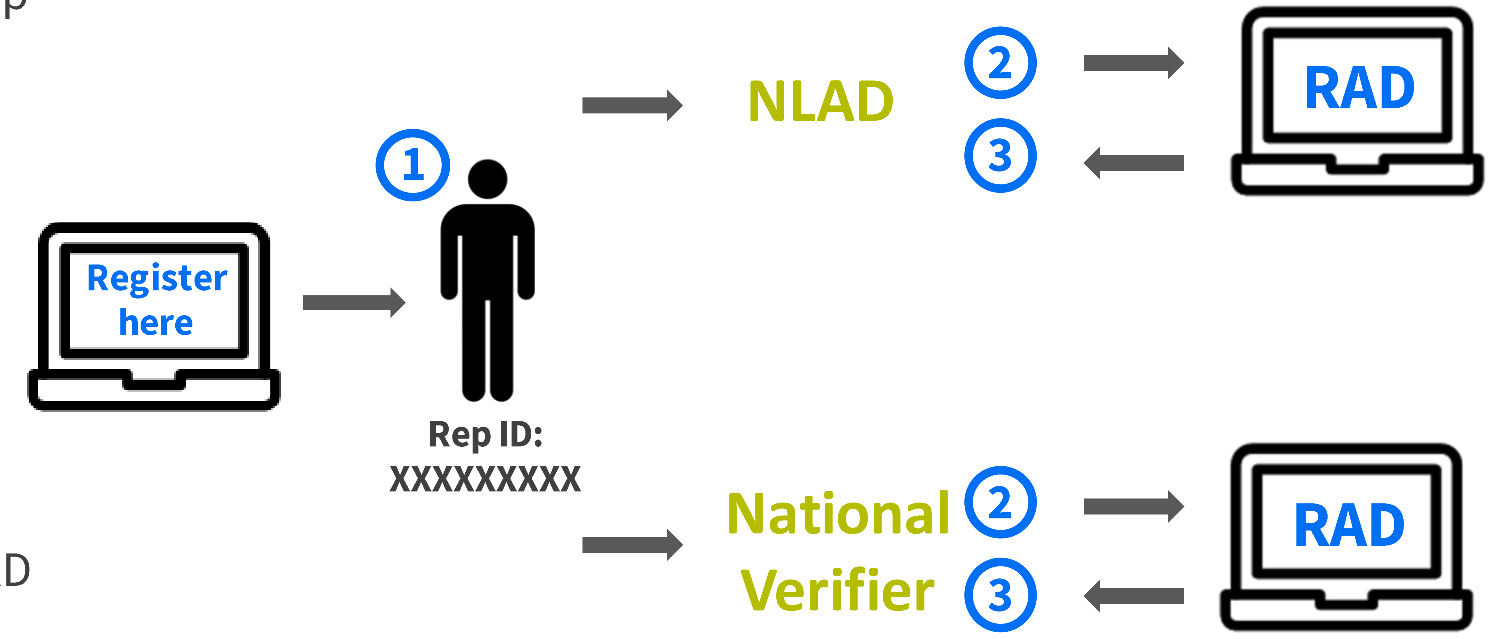
About RAD
Interaction with Lifeline Systems

Enrollment representatives visit RAD to validate their identity and register for their unique ID (Rep ID).

The representative's service provider then links their Rep ID to their NLAD or NV user account.

After this is complete:

1. The enrollment representative performs transactions in the NLAD or NV system
2. NLAD and National Verifier confirms with RAD using the Rep ID that the representative can perform transactions
3. NLAD and National Verifier stores the Rep ID from RAD with each transaction record within NLAD and NV



Questions?

Timeline

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RAD Timeline

2019

June 25 Representatives could begin registering for a Representative ID

July 16 RAD released to staging environments, allowing service providers to begin to test linking Representative IDs to test National Verifier and NLAD accounts

August 1 Additional staging environments release, allowing service providers to test the validations and errors related to a Representative ID during NLAD transactions

December 4 RAD released to the production environments for optional use

December 27 FCC's Fifth Report and Order published in the Federal Register

2020

! **March 26** **The Commission's Enrollment Representative rules are effective, and RAD is Mandatory**

RAD Effective Date

March 26

- **RAD will be mandatory**
- NLAD and National Verifier transactions will require a Representative ID and you will receive an error if you try to perform a transaction without a Rep ID
- Transactions submitted via API must include the correctly populated fields in the API Specifications
  - (RepID or RepNotAssist)

RAD Check List
Preparing for March 26

March 26

- ✓ Ensure your enrollment representatives **self-register** for a Rep ID. All errors must be resolved before use of the Rep ID. This applies to both domestic and international representatives.
- ✓ Collect each Representative ID.
- ✓ **Link** Representative IDs to the respective NLAD/NV user accounts and/or API IDs

RAD Check List
Caution

! Beginning **March 26, 2020**, if a Representative ID is not linked to a NLAD user account, the representative will be unable to perform National Verifier and/or NLAD transactions

! Service providers who use NLAD and NV APIs and fail to include a Rep ID where appropriate in transactions are failing to comply with the FCC's rules

Questions?

Registration

RAD 101

Registration Process

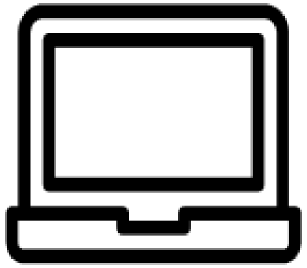
Representative Enters PII into RAD

PII is validated + checked for duplicates

USAC Manual Review (if necessary)

Note: PII collected in RAD will follow the same data security practices as data collected in NLAD, so the same privacy procedures that are followed for subscribers will be applied to representatives. RAD is constructed as part of NLAD, and therefore, RAD is Federal Information Security Modernization Act (FISMA) accredited as being compliant with National Institute of Standards and Technology (NIST) standards.

Registration

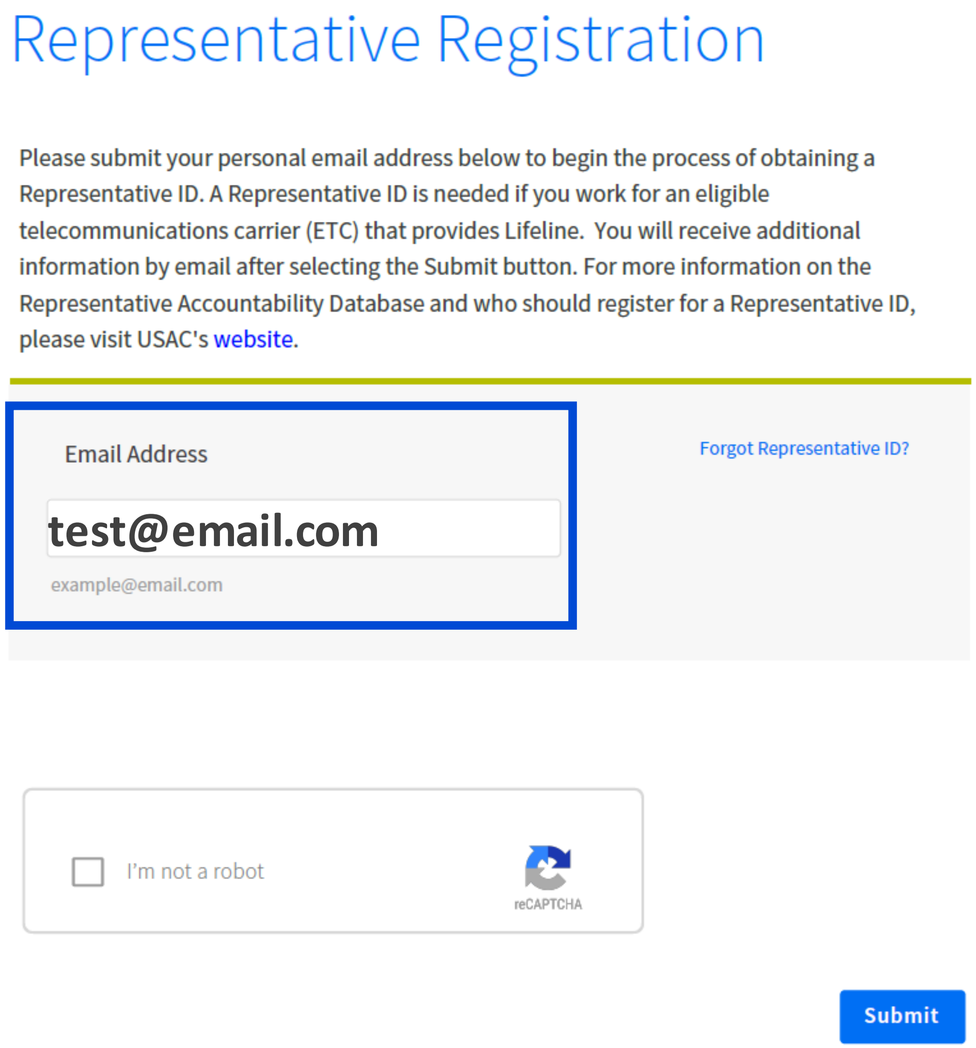


- **Registration** is performed directly by the representative through RAD
- The representative **self registers** at LifelineRAD.org

Registration
Email Address

USAC recommends but does not require that representatives use their **personal** email to register for a Rep ID

- This email address will be used to communicate with a representative throughout the registration process and if they need to retrieve their Representative ID
- Using a personal email will ensure that representatives still have access if they work for more than one Lifeline company, or if they move between companies and are not able to access a company email



Registration

Representatives submit the following personally identifiable information (PII):

- Full name
- Date of birth
- Last four digits of their social security number (SSN4),*
- Residential address, and email address

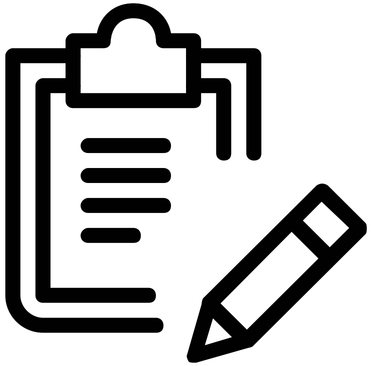
*SSN4 is **optional** beginning at the end of February; however, representatives that opt out of submitting their SSN4 will have to submit documentation to verify their identity, which **will** prolong the registration process.

Registration

PII will go through a validation process similar to subscriber third-party identity verification (TPIV) and duplicate checks

- All PII submitted is subject to the same protections consumer data receives

Registration



USAC will manually review identity documentation for any representative whose identity cannot be verified or who is identified as a duplicate

- This review must be complete and all errors resolved prior to use of Rep ID

Registration
Resolving Errors

Representatives may be identified as a duplicate or their information may encounter one or more of the following errors

- Identity cannot be found
- Date of birth cannot be verified
- SSN4 (last four digits of their social security number) cannot be verified
- Identified as deceased
- Chose not to provide SSN4

Registration
Resolving Errors

Representatives, or their service providers on their behalf, may submit documentation to resolve errors encountered during the registration:

- Online, through USAC's secure webpage, **or**
  - You can review the online document submission guide here
- Through the mail, at:
  - **Lifeline Support Center:**
    P.O. Box 7081
    London, KY 40742

Representatives must submit documentation within **45 days** of the notification that they need to provide more information.

Registration
Resolving Errors: Domestic Representatives

Information on the documentation needed to resolve errors associated with a domestic representative's Rep ID is available on the RAD Resolving Errors webpage

- A RAD cover Sheet must be included with any documentation submitted to resolve errors
- Representatives that opt out of submitting their SSN4 will be required to submit official, unexpired documentation with their name and date of birth, such as a driver's license or passport

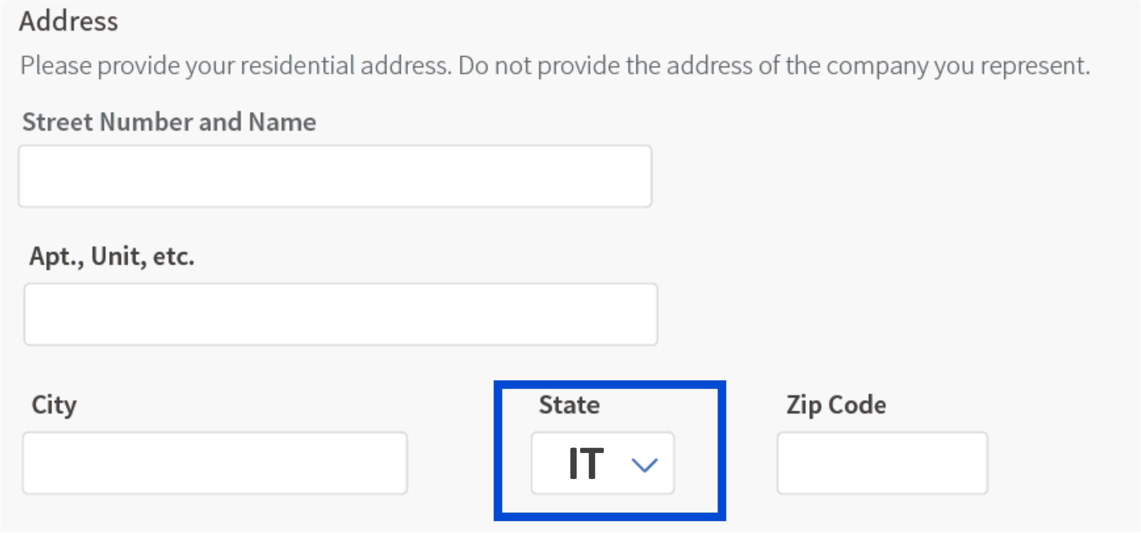
Registration

International Representatives

Registration
International Representatives

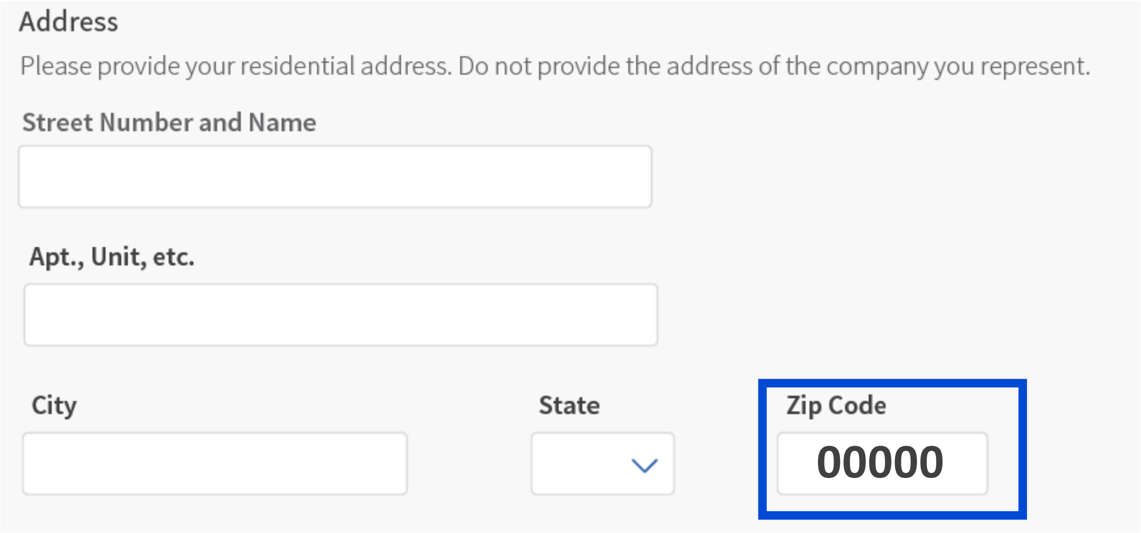
Representatives employed outside of the United States must follow a few special instructions when registering:

- In the “State” field:
  - From the state dropdown menu, select “IT” (international)



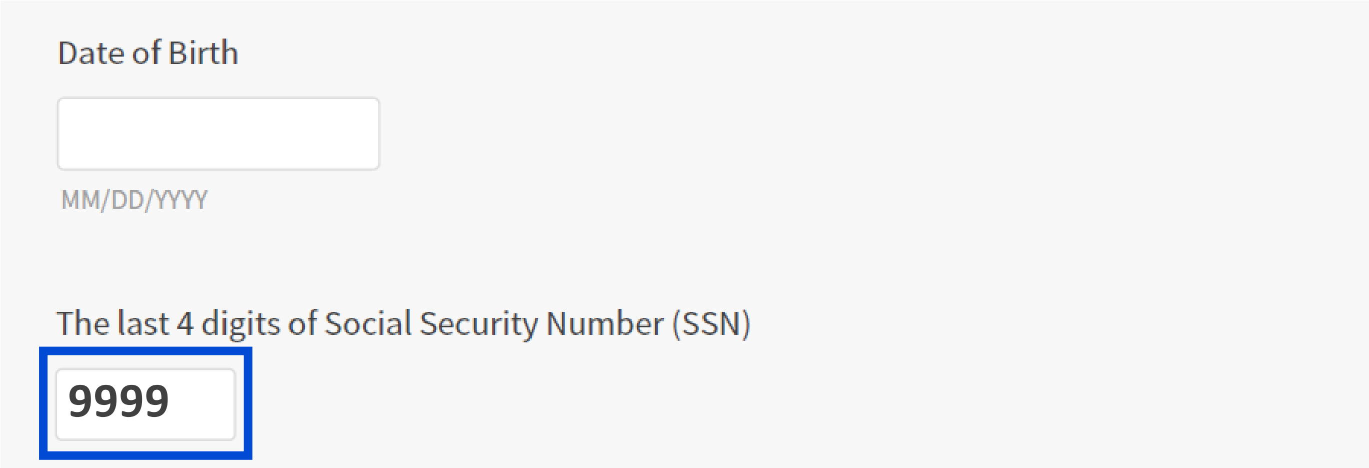
Registration
International Representatives

- In the “Zip Code” field:
  - International representatives should enter “00000”



Registration
International Representatives

- In the “Social Security Number” field:
  - Currently international representatives should enter “9999”
  - **Once SSN4 becomes an optional field, they should leave it blank**



Registration
Resolving Errors: International Representatives

Information on the documentation needed to resolve errors associated with an international representative's Rep ID is available on the International Representative webpage.

Required documentation for international representatives:

- A letter that includes:
  - The service provider's name and contact information of an employee that can confirm the representative's position
  - The representative's full legal name and Representative ID
  - The employer's signature and the date it was signed
- A copy of some form of government-issued identification
- RAD cover Sheet

Link Accounts

RAD 101

Link Accounts

- **497 Officers** have to link Representative IDs to **ETC Admin** roles
- **ETC Admins** have to link Representative IDs to all **subaccount** roles and/or API IDs

Link Accounts
Existing User Accounts

ETC Admins and 497 Officers will upload a file to NLAD to link a Representative ID to existing representatives' subaccounts

- Do not include spaces after a representative's name when populating template
- The file may contain one or more accounts
- All 8 column headers are required in the file template
- Values for "User Name" and "API ID" are conditional (1 of the 2 are required, but cannot have values for both in the same row)
- Master Agent values are optional

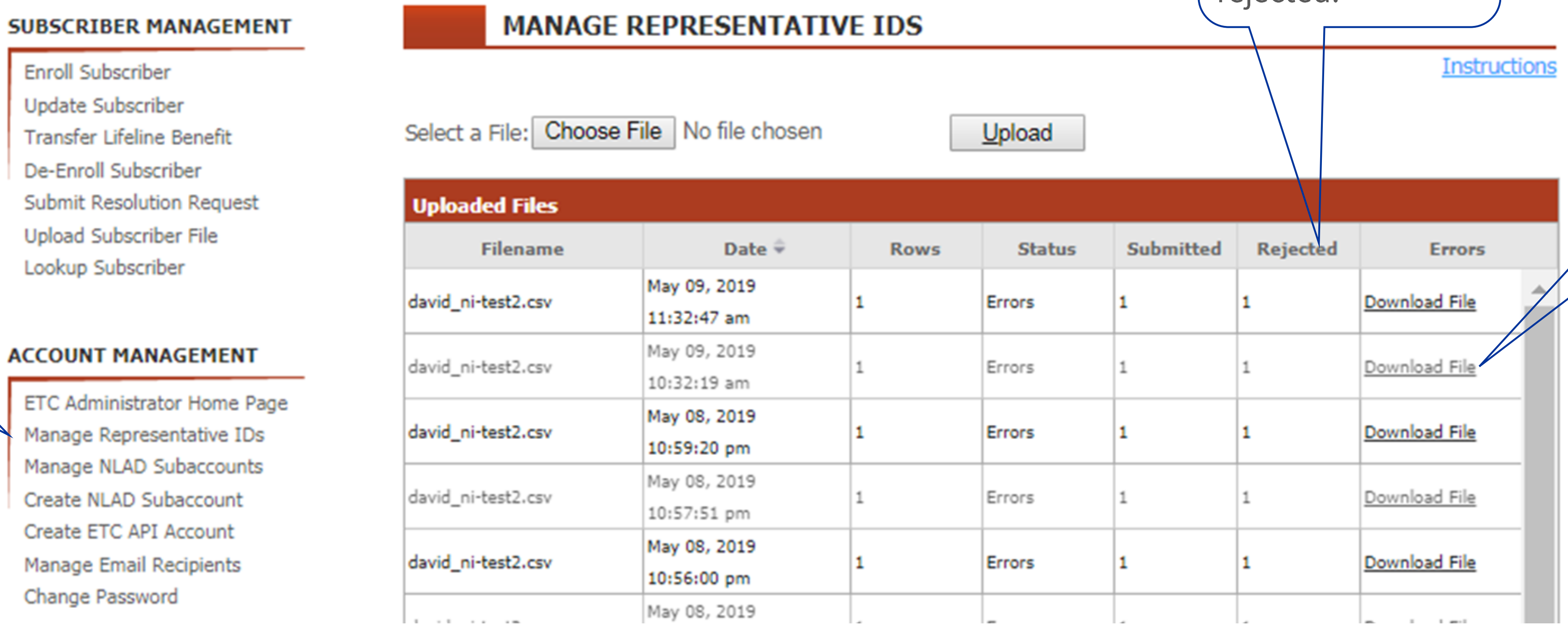
	A	B	C	D	E	F	G	H
1	firstName	lastName	representativeId	userName	apiId	masterAgentFirstName	masterAgentLastName	masterAgentRepID
2								
3								
4								
5								
6								

Link Accounts
Existing User Accounts

The ETC Admin clicks “**Manage Representative IDs**.”

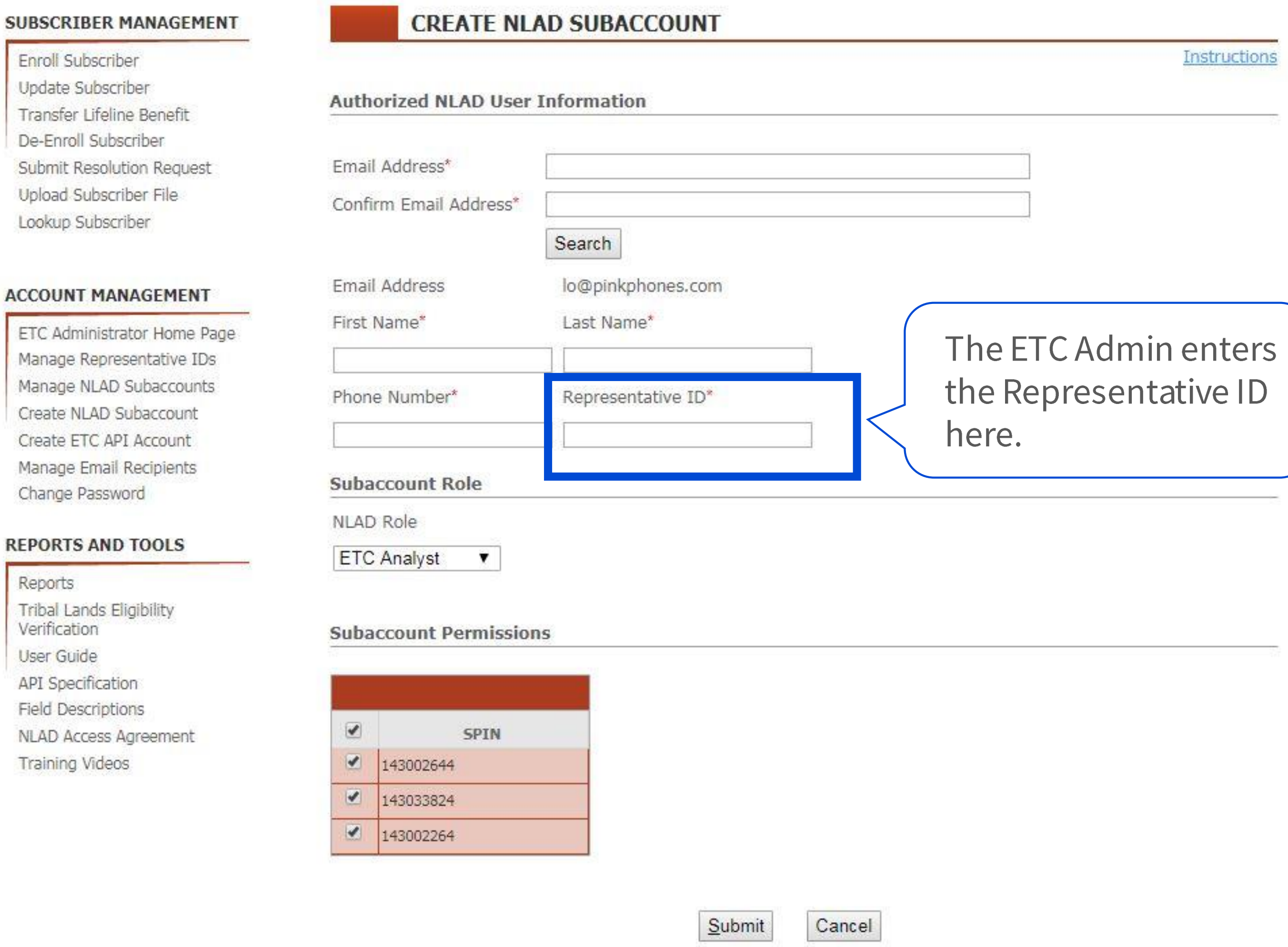
This column displays how many rows in a file were rejected.

If any Representative IDs received an error, you can download this file to see what errors are associated with the Representative IDs.



Link Accounts

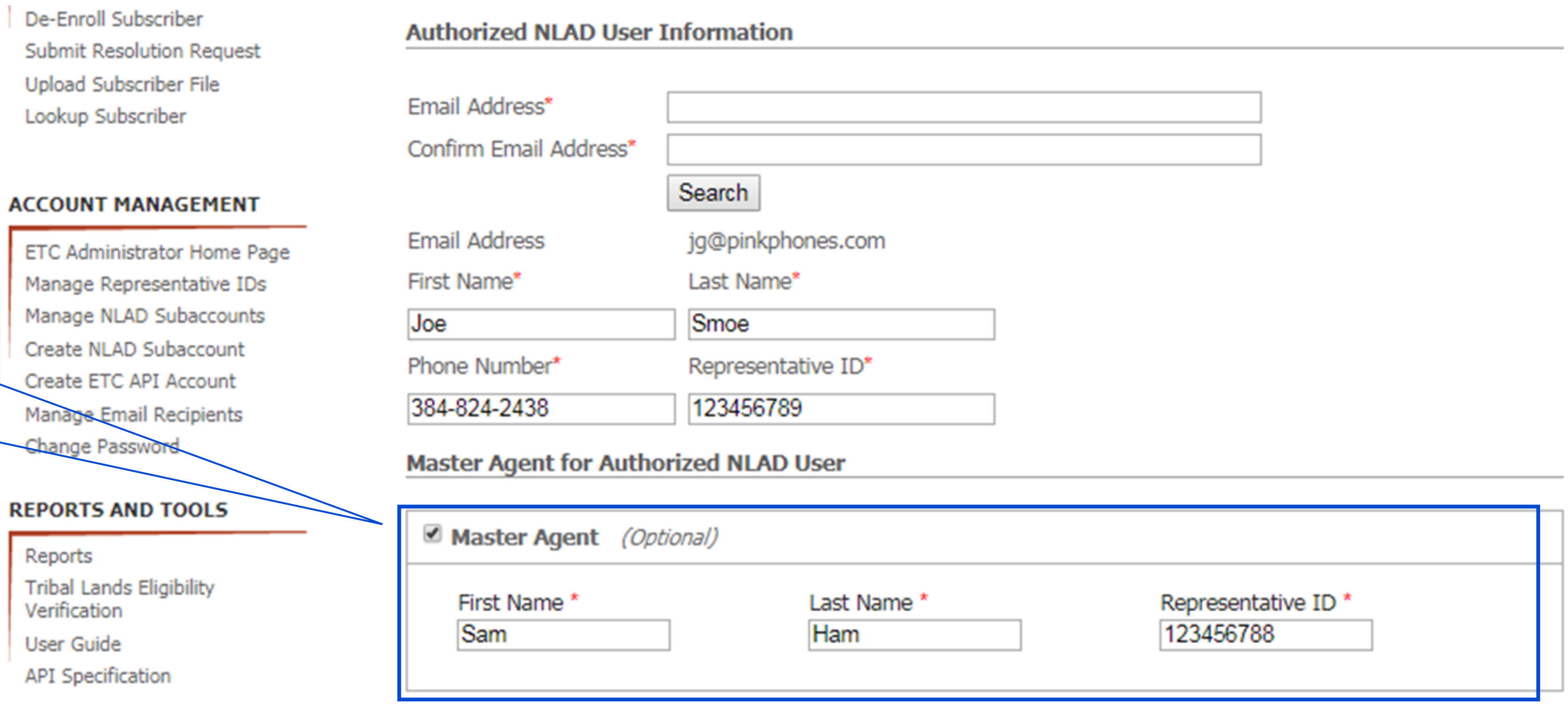
New User Accounts



The ETC Admin enters the Representative ID here.

Link Accounts
New User Accounts: Master Agent

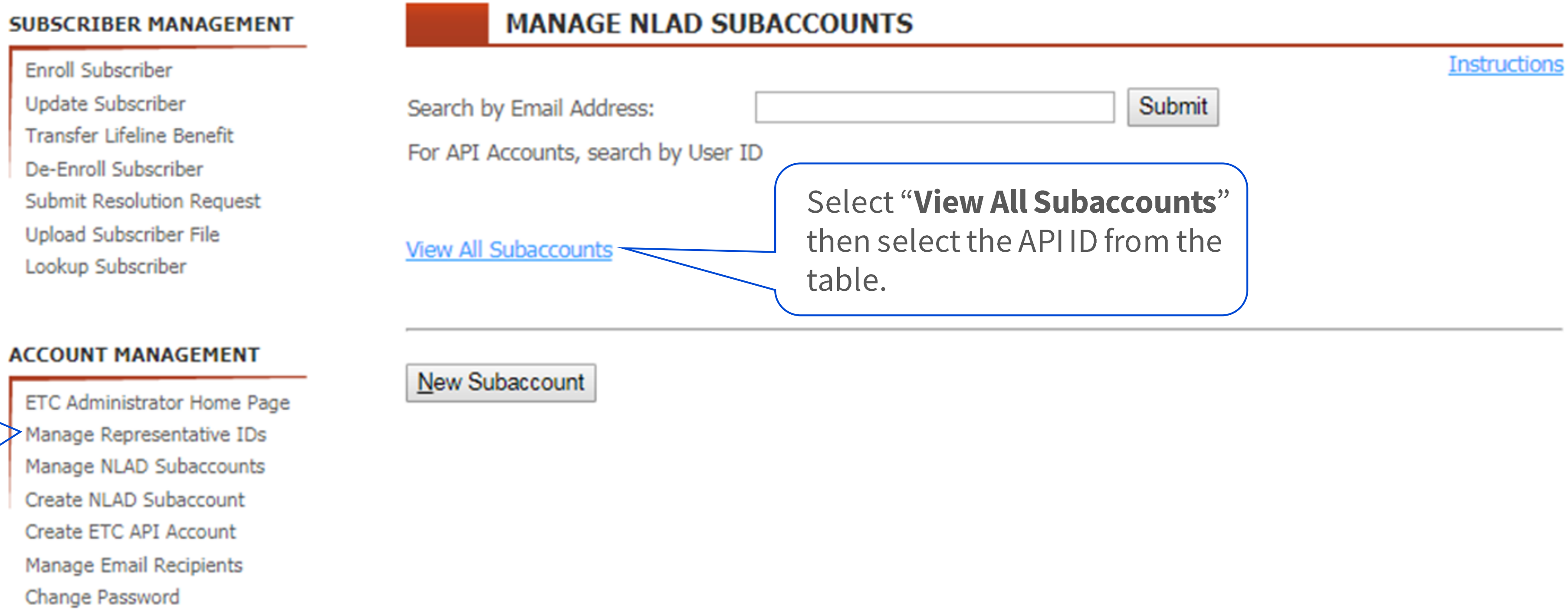
The Master Agent is an optional field. The ETC Admin should provide Master Agent information for all representatives that this applies to.



Link Accounts
API

- There are two options to link a Representative ID to an API ID:
  1. Use the batch linking process and file upload on the Manage Representative IDs page
  2. Individually link representatives on the Update NLAD Subaccount page

Link Accounts
API



Navigate to the "**Manage NLAD Subaccounts**" page and search by User ID of the ETC API account you want to add representatives to.

Select "**View All Subaccounts**" then select the API ID from the table.

Questions?

FAQs

RAD 101

FAQs
Registration

Who needs to register?

- NLAD/NV user roles require a Representative ID if the individual in that role is considered an enrollment representative and may perform Lifeline enrollments, eligibility checks, recertifications, etc.
- This includes enrollment representatives in opt-out states that use USAC's systems for these activities

Who is a Master Agent?

- Individuals that contract directly with ETCs and oversee or manage a team of people working to complete Lifeline enrollments

FAQs
Registration

Can a representative use their company email to register if they would like?

- A representative may use their company email to register for a Representative ID, although USAC recommends that representatives use a personal email

What PII is required during registration?

- First name, last name, date of birth, SSN4*, and address

* SSN4 will become optional in late February

How is this PII protected?

- PII collected in RAD will follow the same data security practices as data collected in NLAD, so the same privacy procedures that are followed for subscribers will be applied to representatives
- RAD is constructed as part of NLAD, and therefore, RAD is Federal Information Security Modernization Act (FISMA) accredited as being compliant with National Institute of Standards and Technology (NIST) standards

FAQs
Linking

Where is the linking performed?

- All accounts (NLAD, NV, and API) are linked to Rep IDs in NLAD

Where can we find information on the instructions to link Representative IDs to accounts?

- The RAD Resources page includes to linking guides
  - NLAD Production Guide: RAD with Individual User Accounts
  - NLAD Production Guide: RAD with API Accounts

Can ETCs have more than one Rep ID linked to their accounts?

- There is **no** limit to the amount of representatives that may be associated with a service provider

FAQs
Linking

Is linking a Representative ID instant?

- Linking is instant if there are no validation errors. You will receive an error in NLAD the Rep ID does not match the first/last name, the Rep ID is locked, or the representative has unresolved registration errors

Can we link multiple representatives to the API NLAD account?

- Yes, you can link multiple representatives to an API NLAD account
- However, only Rep ID should be submitted at a time

FAQs
Linking

If a service provider has more than one SAC, do we have to link the rep to each one?

- No, representatives are linked to the company through accounts based on the SPIN(s) the account has access to rather than by SAC

Will Representative IDs be required at account creation?

- Representative IDs are **not** required for account creation
- Beginning March 26, a Representative ID will be required for a representative to **perform NLAD and NV transactions, and the API fields must be populated correctly (RepID or RepNotAssist)**

FAQs
Transactions

If one representative enrolls an applicant and another representative reviews proofs (in a state that is not using the NV – i.e. soft launch state), which Rep ID should be associated with the transaction?

- Provide the Rep ID of the person closest to the transaction
- For example, if the application is going through review on the service provider's side before the enrollment, then the service provider should provide the Rep ID of the final approver, as that is the person actually completing the required step for the carrier to send the enrollment

Resources

RAD 101

Resources
Visit Our Website

For general RAD information, visit the RAD section of usac.org.

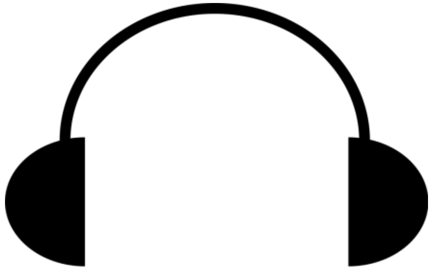
- The RAD Resources page includes:
  - NLAD Staging Guides for linking individual user accounts and APIs
  - NLAD Production Guides for linking individual user accounts and APIs
  - Linking Representatives File Upload Template
  - Bulk Upload with NLAD Input
  - Slide decks from previous training sessions

Resources
Watch a Video

Review our series of short videos:

- RAD 101
- How to Register
- How to Submit Documentation

Resources
Upcoming Office Hours



- **Thursday, February 20:**
  - RAD Office Hours: API Users
- **Thursday, February 27:**
  - RAD Office Hours: Individual Users

Thank You!

- Thank you for joining us!
- Sign up to our Lifeline Program newsletter to receive the latest news about RAD
  - Visit our subscription center
- Need help? Contact us!
  - General inquiries: LifelineProgram@usac.org
  - RAD inquiries: LifelineSupport@usac.org

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