

NATIONAL VERIFIER ANNUAL REPORT AND DATA

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I. BACKGROUND

In March 2016, the Federal Communications Commission (FCC) adopted the Lifeline Reform and Modernization Order (*2016 Lifeline Order*) to further update the Lifeline program, including the streamlining of eligibility verification for enrollment and recertification.¹ Historically, eligible telecommunications carriers (ETCs) or state administrators were responsible for verifying the eligibility of potential subscribers. The FCC recognized that this structure was complex, burdensome, and had the potential for waste, fraud, and abuse. With the adoption of the *2016 Lifeline Order*, the FCC directed USAC to establish a system for independent, third-party eligibility determinations. To enable this new process, USAC built the National Lifeline Eligibility Verifier (National Verifier) to automate, where possible, and standardize eligibility verification across all states and territories.

USAC deployed the National Verifier in groups of states and territories on a rolling basis beginning in June 2018. As of December 2019, the National Verifier was available for ETCs to use in all states and territories where they previously confirmed subscriber eligibility for the program, although certain jurisdictions were in soft launch status and ETCs could use the system on an optional basis. As of December 2020, the National Verifier had fully launched in all states, territories, and the District of Columbia. Since the initial launch of the National Verifier, consumers have submitted more than 6.8 million applications nationwide.

This annual report provides a summary of the rollout of the National Verifier and its functionality, and outlines how the National Verifier meets the FCC's key objectives to protect against waste, fraud, and abuse; lower costs to the Universal Service Fund (Fund) and ETCs through administrative efficiencies; and better serve eligible beneficiaries by facilitating choice and improving the enrollment experience. It also provides an update on the status of the National Verifier, including recent actions taken to respond to the COVID-19 pandemic.

II. COVID-19 RESPONSE

The FCC released a series of waivers beginning in March 2020 in response to the ongoing COVID-19 pandemic to help ensure low-income consumers are connected to broadband and phone service during this unprecedented time.² The waivers temporarily paused the annual recertification

¹ *Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) (*2016 Lifeline Order*).

² See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 2729 (WCB Mar. 17, 2020) (waiving reverification and recertification requirements for 60 days beginning March 17, 2020); *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 2950 (WCB Mar. 30, 2020) (waiving usage and general de-enrollment requirements and extending prior waiver until May 29, 2020); *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 4482 (WCB Apr. 29, 2020) (relaxing income documentation requirements and extending prior waivers until June 30, 2020); *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 5510 (WCB June 1, 2020) (waiving certain requirements to make it easier for subscribers in rural areas on Tribal lands to begin

process, reverification requirements, usage requirements, and other rules to ensure subscribers are not involuntarily removed from the program during the pandemic.³ Additionally, the FCC and USAC adjusted income documentation requirements for recently unemployed consumers to make it easier to apply.⁴ The FCC and USAC also relaxed documentation requirements for subscribers residing in rural areas on federally recognized Tribal lands to ensure they can get access to service as soon as possible during the waiver period.⁵ These waivers are in effect until February 28, 2021.⁶

To further address subscriber needs during the COVID-19 pandemic, the FCC and USAC gave state public utility commissions and social services organizations enhanced access to the National Verifier portal. This access allows state agency staff to take a more hands-on role in assisting consumers through the Lifeline program application process by giving them the same system capabilities that ETCs have. The FCC and USAC have also continued to promote Lifeline awareness during the pandemic to ensure that consumers who are newly eligible for the program have the information and resources they need to apply. For example, USAC conducted outreach to over 13,000 food banks and homeless shelters and held program training sessions for stakeholder groups nationwide, leveraging partnerships with various federal and state agencies, consumer advocate organizations, and other groups.

III. SUCCESS OF THE NATIONAL VERIFIER

As described in this report, USAC has successfully prioritized automation in the National Verifier so that eligibility decisions are made automatically, using connections to eligibility databases and without human review of eligibility documentation, approximately 71% of the time as of mid-January 2021. Automated eligibility decisions can be made swiftly, at a lower administrative cost, and with a high level of accuracy by using source data and limited human review wherever possible. USAC has partnered with state officials to leverage 22 state database connections,⁷ providing an automated check for participation in the Supplemental Nutrition Assistance Program (SNAP) in each of those states, as well as a check of Medicaid, Supplemental Security Income, and income eligibility, where available. USAC continues to work with willing states to achieve additional connections. See the Appendix for additional information regarding state database connections. The National Verifier also has database connections with two federal agencies. In 2018, USAC built a connection to the U.S. Department of Housing and Urban Development (HUD), providing real-time Federal Public Housing Authority (FPHA) participation results

receiving Lifeline service and extending prior waivers until August 31, 2020); *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 8791 (WCB Aug. 17, 2020) (extending prior waivers until November 30, 2020); *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 12954 (WCB Nov. 16, 2020) (extending prior waivers until February 28, 2021).

³ See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 2950 (WCB Mar. 30, 2020). Though the FCC temporarily waived involuntary de-enrollment, subscribers may still choose to de-enroll from the program.

⁴ See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 4482 (WCB Apr. 29, 2020).

⁵ See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 5510 (WCB June 1, 2020).

⁶ See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 12954 (WCB Nov. 16, 2020).

⁷ Colorado, Florida, Georgia, Indiana, Iowa, Kentucky, Michigan, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Oregon, Pennsylvania, Puerto Rico, South Carolina, Tennessee, Texas, Utah, Virginia, Washington, and Wisconsin. Note: ETCs and consumers in Oregon and Texas do not use the National Verifier for eligibility verification as these states are NLAD opt-out states. However, both states have connections to state databases.

nationwide and in the U.S. territories. In 2019, USAC implemented a similar real-time connection to the Centers for Medicare & Medicaid Services (CMS), providing a check of Medicaid participation nationwide and in the territories of Puerto Rico and the Virgin Islands. The CMS connection alone increased the average automated pass rate in states and territories without connections to state databases from 6% to nearly 60%.⁸

In addition to significantly improving the program integrity posture of the Lifeline program, the National Verifier is also a success story for both program consumers and ETCs. Throughout the development and continuous improvement of the National Verifier system, USAC has been communicating with stakeholders and incorporating feedback to provide a better user experience. See Section V for enhancements USAC made to the National Verifier in 2020 in response to consumer and stakeholder feedback.

IV. DESCRIPTION OF NATIONAL VERIFIER PROCESSES

The key processes that the system supports - application, recertification, and reverification - are summarized below. Also described below are the disbursement process, which occurs in the claims system within the National Lifeline Accountability Database (NLAD), and the eligibility verification process for NLAD opt-out states.

APPLICATION

The purpose of the application process is to determine whether an individual is eligible for the Lifeline program benefit. Applicants can use the National Verifier consumer portal, receive help from an ETC using the National Verifier service provider portal, or mail the application to the Lifeline Support Center. As of December 10, 2019, applicants can also apply through ETC websites that have access to the National Verifier through the eligibility check API.⁹ Applications are validated through available automated eligibility data sources and also undergo checks to confirm identity, verify that the consumer is not already a Lifeline participant, and ensure compliance with other program rules. If an individual's eligibility cannot be validated through these checks, they can upload supporting documentation to the National Verifier portal or mail it to the Lifeline Support Center. Upon completion of the application process, the individual is either deemed qualified for the Lifeline benefit or is required to submit more information. Qualified individuals can contact an ETC in their area to enroll in the Lifeline program.

RECERTIFICATION

Subscribers must recertify annually that they are still eligible for the program in order to continue to receive a Lifeline discount. During recertification, subscribers are checked against available automated eligibility data sources. If a subscriber's eligibility cannot be

⁸ 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.

⁹ Access to the eligibility check API is optional for ETCs. If an ETC would like access, they must sign required security documentation and work with USAC on account management activities.

validated, they are prompted to recertify in the National Verifier consumer portal, on the phone via an interactive voice response (IVR), or via mail. If the subscriber does not recertify within the required 60-day recertification window, they will be de-enrolled, meaning they lose their Lifeline program benefit. The FCC recently strengthened controls within the recertification process to combat waste, fraud, and abuse in the *2019 Lifeline Order*.¹⁰ As of October 13, 2020, subscribers whose eligibility was previously validated through an eligibility database, but cannot be validated through a database check at recertification, will need to provide documentation to prove their eligibility. The new recertification requirement will be implemented after the COVID-19 waiver period ends on February 28, 2021. Subscribers who are not subject to this new requirement are allowed to self-certify their continued eligibility for the program.

REVERIFICATION

Reverification is a one-time validation of existing Lifeline subscribers' eligibility, unique to the roll out of the National Verifier. The purpose is to ensure that all existing Lifeline subscribers who were previously deemed eligible by an ETC or state administrator have been deemed eligible by the National Verifier. It occurs after a state or territory is rolled into the National Verifier at a soft launch and is similar to recertification, except subscribers cannot self-certify and must always provide documentation to prove eligibility if their eligibility cannot be validated through automated data sources. If documentation is required and the ETC has that documentation on hand, they can submit it. If they do not have it on hand, the subscriber is given an opportunity to submit the appropriate documents. Reverification is on hold until after the COVID-19 waivers lift on February 28, 2021.

DISBURSEMENTS

The Lifeline Claims System (LCS) within NLAD, which is the system of record for enrolled subscribers, handles disbursement activity. NLAD existed prior to launch of the National Verifier but is now integrated with the National Verifier to, among other things, streamline the ability to tie disbursements to eligibility data. An ETC must enroll an individual in NLAD, which is only possible if the National Verifier has deemed the individual eligible, in order for the individual to obtain the Lifeline benefit. All ETCs in all states, territories, and the District of Columbia use the LCS to submit claims for reimbursement for federal Lifeline support.

NATIONAL VERIFIER OPERATIONS IN NLAD OPT-OUT STATES

California, Oregon, and Texas have managed eligibility verification and duplicate checking for the federal Lifeline program for many years. Pursuant to waivers granted under the *2012 Lifeline Order*, ETCs in these states do not enroll their subscribers in NLAD. Due to the unique circumstances in these states, the National Verifier launched in these states using a modified approach. The FCC determined that it is appropriate to continue relying

¹⁰ *Lifeline and Link Up Reform and Modernization et al.*, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, FCC 19-111 (2019) (*2019 Lifeline Order*).

on the existing state 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 ETCs' claims for federal Lifeline support. ETCs continue to file and certify their own claims in the LCS. However, USAC validates the claims against state-approved subscriber data. USAC rejects a claim if it cannot be substantiated by state data, and the carrier must refile. In partnership with the three states, USAC also performs reviews of state eligibility information and documentation to ensure that state eligibility determinations are made in accordance with the FCC's rules.

The National Verifier fully launched in Oregon and Texas on November 18, 2020 and in California on December 18, 2020.¹¹ Though the National Verifier continues to rely on existing state eligibility processes for the majority of consumers in California, the National Verifier conducts eligibility verification for broadband-only consumers in the state, and will also conduct reverification for these subscribers once the COVID-19 waivers expire.

V. NATIONAL VERIFIER MEETS 2016 LIFELINE ORDER OBJECTIVES

The three objectives for the National Verifier in the *2016 Lifeline Order* are to: (1) protect against waste, fraud, and abuse; (2) lower costs to the Fund and ETCs through administrative efficiencies; and (3) better serve eligible beneficiaries by facilitating choice and improving the enrollment experience.¹² These goals are being met through the design of the National Verifier system and the administration of related processes.

One of the key features of the National Verifier that furthers all three objectives is automated access to eligibility data sources. USAC has built direct, automated connections to eligibility data sources that are managed by the state and federal agencies that administer the relevant qualifying programs. Automation reduces the need for manual reviews, which are more expensive administratively, increase the burden to ETCs and consumers, and can be subject to human error or manipulation. As of mid-January, the National Verifier is automatically verifying the eligibility of up to 88% of Lifeline consumers in states where it has access to both state and federal database connections and has achieved an average automated database pass rate of about 71% nationwide.

Specifically, the National Verifier leverages automated connections with 22 state agencies and two federal agencies in connection with eligibility verification for the federal Lifeline program.¹³ Though some ETCs had access to eligibility data sources prior to the National Verifier, the automation provided by the National Verifier is an improvement in many states. The National

¹¹ See *Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier in Oregon and Texas*, PN, DA 20-1237 (2020) and *Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier in California*, PN, DA 20-1372 (2020).

¹² See *2016 Lifeline Order*, 31 FCC Rcd at 4007, para. 128.

¹³ In addition to the National Verifier's 20 state connections, Texas and Oregon also utilize automated connections to state databases for their eligibility verification processes.

Verifier has automated connections to SNAP databases that were not previously available to carriers in at least seven states. The National Verifier also has established connections to two federal, nationwide databases (HUD and CMS) not previously available to ETCs. The CMS connection has made the biggest impact in maximizing automation in the National Verifier, but is particularly valuable in states where the National Verifier does not have access to a state database.¹⁴ Before CMS launched, the National Verifier was experiencing a 6% automated eligibility pass rate in states and territories without connections to state databases, on average. With CMS, that rate increased to nearly 60%.¹⁵ In states with connections to state databases, average automated pass rates pre-CMS were already high at 71%. With CMS, some states, such as Colorado, Michigan, New Mexico, Virginia and Wisconsin now have average pass rates of 80% or higher.

Even though the National Verifier has fully launched in all states and territories, USAC is continuously working to increase access to state and federal data sources. There are a number of states where USAC is planning to launch state connections in 2021.

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

i. Protect Against Waste, Fraud, and Abuse

The National Verifier was designed to close one of the key program integrity concerns in the Lifeline program: trusting ETCs to determine subscriber eligibility. Ensuring compliance with Lifeline subscriber eligibility rules and obtaining/maintaining customers are goals that could be, or could be perceived to be, at odds with one another. Hence, creating an independent administrator with a centralized system to conduct eligibility determinations mitigates this conflict of interest. Since its initial launch in June 2018, the National Verifier has continuously improved USAC's capabilities to prevent fraud, waste, and abuse as identified in audits and investigations performed by the Government Accountability Office and FCC Inspector General. USAC, as a neutral administrator, now has visibility into each Lifeline application submitted to the National Verifier, including those where automated checks are not able to verify eligibility, and has visibility into all supporting documents submitted to the National Verifier that are relied upon to qualify for the program.

Though the NLAD opt-out states do not follow the typical National Verifier processes, eligibility determinations are made by an independent third party, as the state reviews eligibility and performs all required validations, including duplicate checks. As described in section IV, the FCC and

¹⁴ A nationwide automated connection to CMS does not diminish the value provided by connections to state databases. Though many of the state connections include Medicaid data, USAC primarily relies on SNAP data from the states. As reflected in the Appendix, all state connections have either SNAP data only or SNAP and Medicaid data. USAC is not pursuing automated state connections to Medicaid-only databases since the National Verifier now has a connection to nationwide CMS data.

¹⁵ 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.

USAC have also implemented enhanced program integrity measures in partnership with the states to prevent waste, fraud, and abuse.

In addition to validating eligibility for new Lifeline subscribers, the National Verifier performs reverification to ensure that existing subscribers whose eligibility was initially validated by a service provider are still eligible for the Lifeline program. To date, USAC has completed reverification of 98% of subscribers in the first five launch groups with an 84% average success rate. Reverification is an ongoing process, and we expect to see numbers remain strong and increase as more subscribers are confirmed eligible. Any subscribers who fail to demonstrate eligibility after ample opportunity within the reverification process will be de-enrolled in accordance with USAC's ongoing efforts to combat waste, fraud, and abuse. Reverification is on hold until after the COVID-19 waivers lift on February 28, 2021.

In 2017, the FCC directed USAC to create the Representative Accountability Database (RAD) as an additional mechanism to guard against waste, fraud, and abuse.¹⁶ RAD is a registration system that validates the identities of representatives performing transactions in USAC systems, including the National Verifier and NLAD. As of May 25, 2020, all representatives are required to obtain a representative ID to perform Lifeline transactions. USAC regularly monitors activity and has authority to lock representative accounts in instances of suspicious activity and/or misuse of the National Verifier and other USAC systems.

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

Centralizing the Lifeline application process under an independent, third party greatly reduces the overall cost to administer the Lifeline program. Using a single, streamlined process rather than the previous framework where each ETC developed and followed its own unique approach generates significant savings to the Fund. In addition to efficiencies gained through a unified platform, the National Verifier has achieved greater automation than the ETCs had, which reduces costly manual reviews and decreases the likelihood of improper payments. Before the National Verifier, ETCs in approximately 20 states benefited from automated connections or processes made available by states for eligibility verification. The National Verifier fills that gap for all ETCs in all states, as it has automated connections to nationwide data sources, as well as additional states where ETCs did not previously benefit from automated connections.

USAC is attentive to the costs of administering the National Verifier system and processes. For example, connections to federal, nationwide databases allow a single investment that can benefit all states and territories and preserve a quality subscriber experience, including real-time results. To date, USAC has avoided an estimated \$25M in potential manual review costs due to having automated connections to state/federal eligibility databases. These efficiencies are related to new applications submitted and reverifications performed since the initial soft launch. Partnership with the NLAD opt-out states also ensures containment of costs and administrative efficiencies as the state administrators will rely on existing processes and their own connections to automated data

¹⁶ See Letter from Ajit V. Pai, Chairman, FCC, to Vickie Robinson, Acting Chief Executive Officer and General Counsel, USAC (2017).

sources.¹⁷ Finally, the incurred costs to stand up and operate the National Verifier system have remained within budget.

iii. Facilitate choice and improve the enrollment experience

The National Verifier has a dedicated consumer portal where consumers can apply for the Lifeline program without needing to apply through an ETC. The consumer portal is simple and user-friendly and available in both English and Spanish. It provides a standardized application process for all subscribers, no matter where they live or what ETC they ultimately choose. Upon qualification for the Lifeline program in the National Verifier consumer portal, the consumer is directed to a list of ETCs located in their area, ensuring that they know their options and can pursue service from the ETC they prefer.

For consumers who wish to apply with assistance from their ETC, there are two options: the National Verifier service provider portal and the eligibility check API, which is integrated within an ETC's own website or online enrollment platform. Not all ETCs have chosen to use the eligibility check API, but all ETCs have access to the service provider portal. Using the service provider portal, an ETC can help a consumer apply with an interview-style approach to gather the necessary information. (The ETC's agent must be present with a consumer to obtain real-time certifications and eligibility information.) The eligibility check API allows a consumer to apply through an ETC's website, if the ETC is participating in this option, and will route the consumer directly to the National Verifier to complete the required certifications. USAC deployed the eligibility check API in December 2019 in response to requests from ETCs for more automated tools with which to interact with the National Verifier. Twenty-nine carriers have been authorized access to the API and over 4.2 million applications have been submitted through the eligibility check API since it was launched. Currently, 89% of Lifeline application transactions occur through the API.

Consumers may also submit applications through the mail, in recognition of limited internet access among the eligible population. Additionally, consumers now have the option to apply with assistance from state agencies.

Consumers in the NLAD opt-out states benefit from the state administrator continuing to manage the eligibility and duplicate check processes, with oversight by the National Verifier. Consumers in these states follow a single, streamlined process to apply for both the federal Lifeline benefit and the state low-income subsidy.

We have continued to implement enhancements to the National Verifier in 2020. In response to feedback from consumers, USAC added a progress bar to the National Verifier portal and Eligibility Check API workflow to inform consumers of where they are within their application process. USAC improved National Verifier portal web responsiveness to enhance navigation across smartphone and tablet devices. USAC also enhanced the information made available to consumers regarding Tribal eligibility in the National Verifier, including a specific error explaining why a consumer cannot be enrolled for the enhanced Tribal benefit and information

¹⁷ Both Texas and Oregon have access to automated data sources in their states.

regarding Tribal consumers' geo-coordinates for their home addresses. Previously, consumers had to wait until enrolling with their carrier to verify Tribal eligibility.

Next, USAC made several improvements to make it easier for consumers to obtain application and enrollment status information. Specifically, consumers can access information in the National Verifier about their current Lifeline enrollment, as well as search for applications within the consumer dashboard. Additionally, consumers are now able to use the Lifeline Support Center IVR system to check the status of their application over the phone.

Finally, in compliance with Section 508 of the Rehabilitation Act of 1973, an external vendor performed functional and usability testing of USAC public websites and Lifelines systems to ensure accessibility to those with disabilities. USAC released updates to NLAD on December 15, 2020 to address the findings provided by the vendor.

VI. NATIONAL VERIFIER GAO ENGAGEMENT

The Government Accountability Office (GAO) performed an audit of the National Verifier in 2020. The audit examined the status of the National Verifier, the FCC's coordination with stakeholders, and the extent to which the National Verifier is meeting the FCC's goals.¹⁸ GAO released the final report in January of 2021, which includes several recommendations on how the FCC and USAC can build on the successful implementation of the National Verifier by expanding consumer awareness and further improving the consumer experience. USAC will work closely with the FCC on implementation of GAO's recommendations. Indeed, some of the enhancements that GAO suggests (e.g., changes to the National Verifier portal and USAC's websites) are already underway.

VII. LOOKING AHEAD

USAC is committed to continuous improvement of the National Verifier and welcomes feedback from all stakeholders. Through newsletters, webinars, surveys, and other communication tools, we have created open channels to explain functionality and processes, answer questions from ETCs, consumers, and other stakeholder groups, and to obtain feedback on the user experience. We use this feedback to enhance system efficiency and ease of use.

In 2021, USAC will continue to work with state and federal agencies to add more automated data sources to the National Verifier. USAC will also continue to track the performance of the National Verifier system and the related operational processes, including those performed by the Lifeline Support Center, on a daily basis in order to identify inefficiencies and areas for improvement. We are 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 in 2020 was one second and, in December 2020, over half of applications that did not require a manual review were

¹⁸ See *FCC Has Implemented the National Verifier but Should Improve Consumer Awareness and Experience*, GAO-21-235 (January 28, 2021). <https://www.gao.gov/assets/720/712068.pdf>.

completed in six minutes or less. Additionally, we use a number of performance metrics to ensure we are responsive to Lifeline stakeholders. For example, the average speed to answer a phone call at the Lifeline Support Center from July to December 2020 was 22 seconds and the average time to perform a manual review was under 6 minutes.¹⁹ As mentioned above, USAC will also be working with the FCC to address the recommendations in the January 2021 GAO Report as part of ongoing efforts to optimize the National Verifier application experience for Lifeline consumers.

¹⁹ This is the average manual review time during Lifeline Support Center business hours from 9 a.m. to 9 p.m. ET.

Appendix: States/Territories Currently Participating in the National Verifier

State	Launch #	Soft / Full Launch	Connection to State Data Source?	Automated Data Connections Established	Applications Received (Through 12/31/2020)
Colorado	1	June '18 / Nov. '18	Yes	SNAP ²⁰ , Medicaid ²¹ , FPHA ²² , CMS ²³	145,014
Mississippi			Yes	SNAP, FPHA, CMS	189,198
Montana			No	FPHA, CMS	5,577
New Mexico			Yes	SNAP, Medicaid, FPHA, CMS	122,793
Utah			Yes	SNAP, Medicaid, FPHA, CMS	66,155
Wyoming			No	FPHA, CMS	1,119
Guam	2	Oct. '18 / Jan. '19	No	FPHA	1,430
Hawaii			No	FPHA, CMS	24,636
Idaho			No	FPHA, CMS	31,159
New Hampshire			No	FPHA, CMS	15,211
North Dakota			No	FPHA, CMS	11,069
South Dakota			No	FPHA, CMS	10,770
Missouri	3	Dec. '18 / March '19	Yes	SNAP, Medicaid, FPHA, CMS	235,605
North Carolina			Yes	SNAP, FPHA, CMS	225,821
Pennsylvania			Yes	SNAP, Medicaid, FPHA, CMS	585,247
Tennessee			Yes	SNAP, FPHA, CMS	180,214
America Samoa	4	Feb. '19 / May '19	No	FPHA	1,984
District of Columbia			No	FPHA, CMS	31,881
Delaware			No	FPHA, CMS	24,004
Maine			No	FPHA, CMS	25,243
Northern Mariana Islands			No	FPHA	3,936
Rhode Island			No	FPHA, CMS	46,965
Virgin Islands			No	FPHA, CMS	770
Indiana	5	March '19 / June '19	Yes	FPHA, SNAP, Medicaid, CMS	265,230
Kentucky			Yes	FPHA, SNAP, Medicaid, CMS	288,376
Michigan			Yes	FPHA, SNAP, Medicaid, SSI, ²⁴ CMS	373,016
Arizona	6	Jun. '19 / Oct. '19	No	FPHA, CMS	198,981
Connecticut			No	FPHA, CMS	88,932
Georgia			Yes	SNAP, Medicaid, CMS	371,453
Iowa			Yes	FPHA, SNAP, CMS	55,351
Kansas			No	FPHA, CMS	58,311
Nebraska			No	FPHA, CMS	5,844
Nevada			Yes	FPHA, SNAP, Medicaid, CMS	112,892
New York			No	FPHA, CMS	503,082

²⁰ SNAP is the Supplemental Nutrition Assistance Program.²¹ Medicaid refers to the State Database.²² FPHA is Federal Public Housing Assistance.²³ CMS is Centers for Medicare & Medicaid Services and refers to the Federal Database.²⁴ SSI is Supplemental Security Income.

State	Launch #	Soft / Full Launch	Connection to State Data Source?	Automated Data Connections Established	Applications Received (Through 12/31/2020)	
Vermont			No	FPHA, CMS	8,578	
Virginia			Yes	SNAP, Medicaid, CMS	114,922	
West Virginia			No	FPHA, CMS	90,135	
Alabama	7	Oct.'19 / Jan. '20	No	FPHA, CMS	84,037	
Arkansas			No	FPHA, CMS	121,409	
Louisiana			No	FPHA, CMS	263,916	
Maryland			No	FPHA, CMS	145,114	
Massachusetts			No	FPHA, CMS	70,378	
New Jersey			No	FPHA, CMS	73,194	
Oklahoma			No	FPHA, CMS	192,562	
Puerto Rico ²⁵			Yes	SNAP, FPHA, CMS	166,983	
South Carolina			Yes	FPHA, SNAP CMS	118,509	
Washington			Yes	FHPA, SNAP, Medicaid, CMS	140,821	
Florida			8	Dec.'19 / Mar.'20	Yes	FPHA, SNAP, Medicaid, CMS
Illinois	No	FPHA, CMS			153,412	
Minnesota	No	FPHA, CMS			72,555	
Ohio	No	FPHA, CMS			347,498	
Wisconsin	Yes	FPHA, SNAP, Medicaid, SSI, CMS			102,807	
California ²⁶	9	Dec.'19 / Nov. '2020	No	N/A	181	
Oregon			Yes	SNAP, Medicaid, SSI*	408	
Texas			Yes	SNAP, Medicaid*	0	
	TOTAL					6,835,154

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

²⁵ Puerto Rico fully launched on June 23, 2020.

²⁶ California fully launched on December 18, 2020.