

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 Previously, 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 2020, the National Verifier had fully launched in all states, territories, and the District of Columbia. In 2022, consumers submitted over 20 million Lifeline applications nationwide. USAC administered the Emergency Broadband Benefit Program (EBB Program) in 2021 and now administers the Affordable Connectivity Program (ACP), which replaced the EBB Program and began on December 31, 2021. The ACP utilizes the National Verifier as one means of eligibility verification. The ACP is discussed further in Section II.

This annual report provides a summary 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), Congress-appropriated ACP funds, and ETCs and ACP providers through administrative efficiencies; and better serve eligible beneficiaries by facilitating choice and improving the enrollment experience. This report also provides an update on the use and performance of the National Verifier, including a discussion of system enhancements for the Lifeline and ACP programs.

II. AFFORDABLE CONNECTIVITY PROGRAM (ACP)

On November 15, 2021, President Biden signed the Infrastructure Investment and Jobs Act (Infrastructure Act), which modified and transitioned the Emergency Broadband Benefit (EBB) Program into the ACP.² On January 14, 2022, the FCC adopted the Affordable Connectivity Program Report and Order (*ACP Order*), which established program rules for the ACP.³ The Infrastructure Act retained many of the requirements of the EBB Program but also made several

¹ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 11-42 *et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (2016) (*2016 Lifeline Order*).

² See 47 U.S.C. § 1752.

³ Press Release, FCC, FCC Adopts Rules to Implement Affordable Connectivity Program (Jan. 14, 2022), <https://www.fcc.gov/document/fcc-adopts-rules-implement-affordable-connectivity-program>; *Affordable Connectivity Program*, WC Docket No. 21-450, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-2 (2022).

modifications, including changes to the eligibility criteria and a reduction of the monthly discount amount for non-Tribal subscribers from up to \$50 to up to \$30. The benefit for consumers living on qualifying Tribal lands of up to \$75 per month stayed the same as it was in EBB. Additionally, a one-time connected device discount of up to \$100 for a laptop, desktop computer, or tablet with a consumer co-pay of more than \$10 but less than \$50 toward the cost of the device was retained.

Households can qualify for ACP if they are enrolled in Lifeline; meet the program income requirements (up to 200% of the Federal Poverty Guidelines);⁴ or participate in a qualifying program including, but not limited to, the Lifeline-qualifying programs (e.g., Federal Public Housing Assistance, Medicaid, Supplemental Nutrition Assistance Program (SNAP), and Supplemental Security Income (SSI)). Additional qualifying programs for ACP that are not qualifying for Lifeline are the Special Supplemental Nutrition Program for Women, Infants, and Children (WIC), free or reduced-price school breakfast/lunch program,⁵ and the federal Pell Grant program.

By utilizing existing Lifeline application and enrollment systems for ACP enrollments through the National Verifier, USAC and the FCC leveraged well-tested processes and automation that contributed to the early success of the ACP. For example, many of the existing data connections with state and federal agency partners were used to verify ACP participation in qualifying programs like Medicaid and SNAP.

From January 1, 2022 to December 31, 2022, the ACP provided discounts on broadband services to over 15.4 million households and discounts on over 3 million connected devices. Thirty-two percent (5 million) of ACP subscribers enrolled directly in the ACP due to their participation in Lifeline. Forty-two percent (6.4 million) of ACP subscribers applied through the National Verifier and the remaining 26 percent (4 million) were enrolled after being verified through their provider's approved alternative verification process. Less than 0.1 percent (around 6,000) of ACP subscribers were verified through the school-based process.

III. COVID-19 LIFELINE WAIVERS

The FCC released a series of waivers beginning in March 2020 in response to the ongoing COVID-19 pandemic to help ensure that low-income consumers were connected to broadband and phone service during this unprecedented time.⁶ The waivers temporarily paused the annual recertification

⁴ The Lifeline benefit's income requirement is 135% or less than the Federal Poverty Guidelines.

⁵ Qualification requirements for the free and reduced price lunch program are under the Richard B. Russell National School Lunch Act, and for the school breakfast program, under section 4 of the Child Nutrition Act of 1966.

⁶ 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 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);

process, reverification requirements, usage requirements, and other rules to ensure that subscribers were not involuntarily removed from the program during the pandemic.⁷ Additionally, the FCC and USAC adjusted income documentation requirements for recently unemployed consumers to make it easier to apply.⁸ The FCC and USAC also relaxed documentation requirements for subscribers residing in rural areas on federally recognized Tribal lands to ensure they received access to service as soon as possible during the waiver period.⁹ The waiver related to usage requirements expired on May 1, 2021.¹⁰ The waivers largely remained in effect through June 30, 2022. The waiver of recertification and reverification requirements for subscribers residing on Tribal lands is currently expected to run through April 30, 2023.¹¹

IV. SUCCESS OF THE NATIONAL VERIFIER

USAC has successfully prioritized automation in the National Verifier so that many eligibility decisions are made automatically, using connections to state and federal databases and without human review of eligibility documentation for both Lifeline and ACP.¹² Automated eligibility decisions are made swiftly, at a lower administrative cost, and with the highest level of program integrity by using source data from our state and federal partners. In 2022, USAC partnered with officials to leverage 24 state database connections and a similar database connection with Puerto

Lifeline and Link Up Reform and Modernization, Order, 35 FCC Rcd 12954 (WCB Nov. 16, 2020) (extending prior waivers until February 28, 2021); *Lifeline and Link Up Reform and Modernization*, Order, 36 FCC Rcd 4448 (WCB Feb. 24, 2021) (extending prior waivers through June 30, 2021 with the exception of the waiver of the Lifeline non-usage requirement); *Lifeline and Link Up Reform and Modernization Order*, Order, DA 21-760, 2021 WL 2668477 (WCB June 28, 2021) (extending prior waivers through September 30, 2021); *Lifeline and Link Up Reform and Modernization Order*, Order, DA 21-1191, 2021 WL 4354767 (WCB Sept. 22, 2021) (extending prior waivers through December 31, 2021); *Lifeline and Link Up Reform and Modernization Order*, Order, DA 21-1650, 2021 WL 6197252 (WCB Dec. 30, 2021) (extending prior waivers through March 31, 2022); *Lifeline and Link Up Reform and Modernization*, Order, WC Docket No. 11-42, DA 22-691, 2022 WL 2399681 (WCB June 30, 2022) (partially extending Lifeline program recertification and reverification requirements for subscribers residing on Tribal lands through September 30, 2022) (*Twelfth Lifeline Waiver Order*); *Lifeline and Link Up Reform and Modernization*, Order, WC Docket No. 11-42, DA 22-1039, 2022 WL 5241251 (WCB Sept. 30, 2022) (partially extending Lifeline program recertification and reverification requirements for subscribers residing on Tribal lands through Jan. 31, 2022) (*Thirteenth Lifeline Waiver Order*); *Lifeline and Link Up Reform and Modernization*, Order, WC Docket No. 11-42, DA 23-84 (WCB 2023) (extending limited program recertification and reverification requirements for subscribers residing on Tribal lands through Apr. 30, 2023) (*Fourteenth Lifeline Waiver Order*).

⁷ 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.

⁸ See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 4482 (WCB Apr. 29, 2020).

⁹ See *Lifeline and Link Up Reform and Modernization*, Order, 35 FCC Rcd 5510 (WCB Jun. 1, 2020).

¹⁰ See *Lifeline and Link Up Reform and Modernization*, Order, 36 FCC Rcd 4448 (WCB Feb. 24, 2021).

¹¹ See *Lifeline and Link Up Reform and Modernization*, Order, WC Docket No. 11-42, DA 22-691, 2022 WL 2399681 (WCB June 30, 2022) (partially extending Lifeline program recertification and reverification requirements for subscribers residing on Tribal lands through Sept. 30, 2022) (*Twelfth Lifeline Waiver Order*); *Lifeline and Link Up Reform and Modernization*, Order, WC Docket No. 11-42, DA 22-1039, 2022 WL 5241251 (WCB Sept. 30, 2022) (extending the partial waiver for Tribal recipients through Jan. 31, 2023) (*Thirteenth Lifeline Waiver Order*); *Lifeline and Link Up Reform and Modernization*, Order, WC Docket No. 11-42, DA 23-84 (WCB 2023) (extending limited program recertification and reverification requirements for subscribers residing on Tribal lands through Apr. 30, 2023) (*Fourteenth Lifeline Waiver Order*).

¹² As of December 2022, the automated pass rate for the Lifeline program is approximately 65%.

Rico,¹³ providing an automated check for participation in SNAP in each of those states, as well as a check of Medicaid, Supplemental Security Income, and income eligibility, where available. Twenty-two of the 24 connections are also used for ACP eligibility verification.¹⁴ USAC and the FCC continue to work with states to achieve additional database connections for use in both programs. See the Appendix for additional information regarding state database connections.

The National Verifier also has database connections with three federal agencies for both Lifeline and ACP. In 2018, USAC built a connection to the U.S. Department of Housing and Urban Development (HUD), providing real-time participation results for qualifying Federal Public Housing Authority (FPHA) programs in all 50 states, the District of Columbia, and U.S. territories. In 2019, USAC implemented a similar real-time connection to HHS Centers for Medicare and Medicaid Service (CMS), providing a check of Medicaid participation in all 50 states, the District of Columbia, and in the territories of Puerto Rico and the U.S. Virgin Islands. The CMS connection has contributed to the increased average automated pass rate in states and territories without connections to state databases from 6% to nearly 65% for Lifeline.¹⁵ Finally, in November 2022, USAC implemented an automated database connection with the U.S. Department of Veterans Affairs to verify participation in qualifying Veterans Pension and Survivors Benefit programs. USAC continues to work towards identifying and achieving additional federal database connections for use in Lifeline and ACP.

The National Verifier is a success story for both program consumers and service providers. 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 VI for an overview of the enhancements USAC has made to the National Verifier in 2022 in response to consumer and stakeholder feedback.

V. 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 NLAD, and the eligibility verification process for Lifeline NLAD opt-out states.

APPLICATION

The purpose of the application process is to determine whether an individual is eligible for Lifeline and/or ACP benefit(s). Applicants can enroll via the National Verifier through the

¹³ State database connections in 2022 include Colorado, Connecticut, Florida, Georgia, Indiana, Iowa, Kentucky, Michigan, Minnesota, 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.

¹⁴ State database connections in 2022 for ACP include Colorado, Connecticut, Florida, Georgia, Indiana, Iowa, Kentucky, Michigan, Minnesota, Mississippi, Missouri, Nevada, New Mexico, North Carolina, Pennsylvania, Puerto Rico, South Carolina, Tennessee, Utah, Virginia, Washington, and Wisconsin.

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%. As of December 2022, there has been an automated pass rate of about 65% in states without a connection to state databases.

National Verifier consumer portal, receive help from a service provider using the National Verifier service provider portal, or mail the application to the specific program support center. Applicants can also apply through service provider websites that have access to the National Verifier through the eligibility check Application Programming Interface (API).¹⁶ Applications are validated through available automated eligibility data sources and also undergo checks to confirm identity, verify that the consumer is not already enrolled in the program, 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 program support center. Upon completion of the application process, the individual is either deemed qualified for the program benefit or is required to submit more information. Qualified individuals can contact a service provider in their area to enroll in the program.

RECERTIFICATION

Subscribers must recertify annually that they are still eligible for the ACP and Lifeline programs in order to continue to be eligible to participate in the programs. During recertification, subscribers are checked against available automated eligibility data sources. (ACP subscribers who participate in Lifeline and pass Lifeline recertification can rely on their Lifeline recertification.) If a subscriber's eligibility cannot be validated, they are prompted to recertify in the National Verifier consumer portal, on the phone via an interactive voice response (IVR), or via mail.¹⁷ If the subscriber does not recertify within the required 60-day recertification window, they will be de-enrolled, meaning they lose their program benefit. The FCC strengthened controls within the recertification process to combat waste, fraud, and abuse in the *2019 Lifeline Order*.¹⁸ 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 was implemented after the COVID-19 waiver period ended on June 30, 2022. 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

¹⁶ Access to the eligibility check API is optional for service providers. If a service provider would like access, they must sign required security documentation and work with USAC on account management activities.

¹⁷ If a subscriber was determined eligible through an FCC-approved ACP alternative verification process (AVP), the service provider is responsible for recertifying their subscribers by the end of each calendar year.

¹⁸ *Lifeline and Link Up Reform and Modernization et al.*, WC Docket No. 17-287, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking, 34 FCC Rcd 10886 (2019) (*2019 Lifeline Order*).

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 was on hold until after the COVID-19 waivers were lifted on June 30, 2022 for subscribers not residing on Tribal lands.

The ACP removed two eligibility program criteria that existed in the EBB Program—substantial loss of income since February 29, 2020, and participation in a service provider’s COVID-19 program. USAC performed reverification on subscribers who previously relied on the two eliminated programs and de-enrolled subscribers who could not verify their eligibility through the new ACP eligibility criteria by March 1, 2022.

DISBURSEMENTS

The Lifeline and ACP Claims Systems within NLAD handles disbursement activity. NLAD is the system of record for enrolled subscribers and 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, for the individual to obtain the Lifeline benefit. Eligibility determination through the National Verifier is not required when a subscriber is determined eligible through an FCC-approved ACP alternative verification process (AVP) or school-based verification. All ETCs and ACP providers in all states, territories, and the District of Columbia use the claims systems to submit claims for reimbursement for federal Lifeline and ACP 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 the process adopted in 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 on the existing state functions, forging a partnership with the states to streamline the application process for consumers and further strengthen program integrity.

In these three states, the state public utility commissions, or their designated administrators, verify eligibility for Lifeline rather than the National Verifier. The state commissions then submit Lifeline subscriber files to USAC. USAC uses these files to populate NLAD and generates the monthly snapshot based on the files. ETCs then use the same process as other states to submit and certify claims for reimbursement in the Lifeline Claims System. 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 Lifeline National Verifier fully launched in Oregon and Texas on November 18, 2020 and in California on December 18, 2020.¹⁹ Though the National Verifier continues to rely on existing state eligibility processes for Lifeline for the majority of consumers in California, the National Verifier conducts eligibility verification for broadband-only consumers in the state.

The ACP does not allow any states to opt out of using NLAD or take a modified approach to use of the National Verifier. Therefore, consumers and providers in California, Oregon, and Texas are required to utilize all of the normal ACP processes. However, since participation in Lifeline is a qualifying criteria for ACP, USAC has specific processes to validate ACP consumers against Lifeline enrollment data that is submitted to USAC by California, Oregon, and Texas. USAC receives these data on a frequent basis to ensure USAC systems remain as up-to-date as possible on the status of Lifeline enrollments in the NLAD opt-out states. This minimizes interruptions to consumer enrollments in ACP as USAC is able to validate the consumers' Lifeline enrollment in a timely manner.

VI. 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.²⁰ 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 service providers and consumers, and can be subject to human error or manipulation. In 2022, the National Verifier automatically verified the eligibility of 68% of Lifeline applications in states where it has access to both state and federal database connections and has achieved an average automated database pass rate of about 65% nationwide.

Specifically, the National Verifier leverages automated connections with 24 state and Puerto Rico agencies and three federal agencies in connection with eligibility verification for the federal Lifeline programs. The National Verifier also leverages automated connections with 22 state and Puerto Rico agencies and three federal agencies in connection with eligibility verification for the ACP. Though some service providers 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 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 three federal, nationwide databases (HUD, CMS, and VA) not previously available to service providers.

¹⁹ See *Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier in Oregon and Texas*, Public Notice, DA 20-1237 (2020) and *Wireline Competition Bureau Announces the Launch of the National Lifeline Eligibility Verifier in California*, Public Notice, DA 20-1372 (2020).

²⁰ See *2016 Lifeline Order*, 31 FCC Rcd at 4007, para. 128.

The CMS connection has made the biggest impact in maximizing automation in the National Verifier and is particularly valuable in states where the National Verifier does not have access to a state database.²¹ Before CMS launched, the National Verifier was experiencing a 6% automated eligibility pass rate for Lifeline in states and territories without connections to state databases, on average. With CMS, that rate increased to nearly 65% for Lifeline.²²

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 several states where USAC is planning to launch state connections in 2023, including Arizona, which recently launched in the first quarter.

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 address one of the key program integrity concerns in Lifeline: 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 and applicant for the program. These benefits also extend to the ACP. We note that while USAC is involved in the eligibility verification process, service providers are ultimately responsible for ensuring their compliance with all program rules.

Though the Lifeline 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 VI, the

²¹ 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. The Infrastructure Act also required the Secretaries of the U.S. Department of Health and Human Services (HHS), U.S. Department of Agriculture (USDA), and U.S. Department of Education to enter into a Memorandum of Understanding with USAC to share data through the National Verifier for the purpose of verifying consumer eligibility for ACP. The MOU with USDA was executed in June 2022. USAC and FCC currently have a computer matching agreement (CMA) with HHS Centers for Medicare and Medicaid Service (CMS), an operating division of HHS, for Medicaid data.

²² As of December 2022, there has been an automated pass rate of about 65% in states without a connection to state databases.

FCC and 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 Lifeline. To date, USAC has completed reverification of 98% of subscribers in the first five launch groups with an 84% average success rate. 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 was largely paused until after the COVID-19 waivers lifted on June 30, 2022.²³

In 2017, the FCC directed USAC to create the Representative Accountability Database (RAD) as an additional mechanism to guard against waste, fraud, and abuse.²⁴ RAD is a registration system that validates the identities of enrollment representatives performing transactions in USAC systems, including the National Verifier and NLAD. As of May 25, 2020, all enrollment representatives are required to obtain a representative ID to perform Lifeline transactions. RAD registration was also required for the EBB Program and is currently required for enrollment representatives performing ACP 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 application process under an independent, third party greatly reduces the overall cost to administer the Lifeline and ACP Programs. For Lifeline, using a single, streamlined process rather than the previous framework where each ETC developed and followed its own unique approach encourages efficiency. In addition, 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. The cost efficiencies of the National Verifier also extend to the ACP, where service providers are permitted by the Infrastructure Investment and Jobs Act to use the National Verifier to confirm a household's eligibility for the program.²⁵

²³ Reverification is still paused for subscribers residing on Tribal lands until April 30, 2023. See *Lifeline and Link Up Reform and Modernization, Order*, WC Docket No. 11-42, DA 22-691, 2022 WL 2399681 (WCB June 30, 2022) (partially extending Lifeline program recertification and reverification requirements for subscribers residing on Tribal lands through Sept. 30, 2022) (*Twelfth Lifeline Waiver Order*); *Lifeline and Link Up Reform and Modernization, Order*, WC Docket No. 11-42, DA 22-1039, 2022 WL 5241251 (WCB Sept. 30, 2022) (extending the partial waiver for Tribal recipients through Jan. 31, 2023); *Lifeline and Link Up Reform and Modernization, Order*, WC Docket No. 11-42, DA 23-84, 2023 (WCB 2023) (partially extending Lifeline program recertification and reverification requirements for subscribers residing on Tribal lands through Apr. 30, 2023) (*Fourteenth Lifeline Waiver Order*).

²⁴ See Letter from Ajit V. Pai, Chairman, FCC, to Vickie Robinson, Acting Chief Executive Officer and General Counsel, USAC (July 11, 2017).

²⁵ Infrastructure Act, div. F, tit. V, section 60502(b)(1), *amending* Consolidated Appropriations Act, 2021, [Public Law 116-260](#), div. N, tit. IX, section 904(a)(6), (a)(7)(A) (2020); [47 U.S.C. 1752\(a\)\(6\)](#), (a)(7)(A).

iii. Facilitate choice and improve the enrollment experience

The National Verifier has a dedicated consumer portal where consumers can apply for the program(s) without needing to apply through a service provider. The consumer portal is 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 in the National Verifier consumer portal, the consumer is directed to a list of service providers located in their area, ensuring that they know their options and can pursue service from the provider they prefer.

For consumers who wish to apply with assistance from their service provider, there are two options: the National Verifier service provider portal and the eligibility check API. The API can be integrated within a provider's own website or online enrollment platform. Not all service providers choose to use the eligibility check API, but all providers have access to the service provider portal. Using the service provider portal, a provider can help a consumer apply with an interview-style approach (the service provider's agent must be present with the consumer). The eligibility check API allows a consumer to apply through a service provider's website, if the provider 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 service providers for more automated tools with which to interact with the National Verifier. Twenty-nine Lifeline service providers have been authorized to access the API, and over 15 million Lifeline applications were submitted through the eligibility check API in 2022. Currently, 76% 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, Lifeline consumers have the option to apply with assistance from state agencies and Tribal partners. Furthermore, service providers can also ask the FCC to approve their alternative verification process and use that approved process to check consumer eligibility for the program.

For Lifeline, NLAD opt-out states each offer a streamlined eligibility process that includes an automated state database eligibility check and duplicate check. Consumers in these states follow a single process to apply for both the federal Lifeline benefit and the state low-income subsidy. These consumers can also use their federal Lifeline enrollment to enroll in the ACP.

USAC has continued to implement enhancements to the National Verifier in 2022 to improve user experience. As an example, USAC embedded the Companies Near Me Tool within the National Verifier making it easier for a consumer to access this tool after they are qualified. This tool can help users find companies in their area that offer Lifeline and ACP.

USAC made several improvements to the National Verifier portal to make it easier for consumers to manage their information and complete applications for either Lifeline or ACP. A recent enhancement includes the "Fix It Here" functionality, which gives the consumers the ability to update their information directly in the National Verifier portal if they believe they entered it incorrectly. In December 2022, new features were added to the Consumer Homepage, including

helpful distinctions between Lifeline and the ACP, the option to apply for each program side by side, and a “Need Help?” option that leads to frequently asked questions and answers.

In an effort to improve communication with consumers, USAC updated and revised language provided to consumers on both the portal and via email, when a document they submitted is rejected. USAC added language on the Eligibility Document Upload Page of the ACP Portal, to provide more information about the requirements for identity and eligibility documentation, and improve the likelihood the consumer submits valid documents. Additionally, in November 2022 alone, 9% (or 340,000) of all users who created an account in the National Verifier never went on to submit an application. To address this, USAC created a new reminder email that will be sent if a consumer creates an account in the National Verifier and does not create an application within two days. This email includes information about each program and directs the consumer back to the National Verifier portal. Finally, USAC added a second reminder email for consumers who still need to provide documents to qualify. This decision was informed by consumer research USAC performed during fall 2022.

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 service providers, consumers, and other stakeholder groups, and to obtain feedback on the user experience. In fall of 2022, USAC reached out directly via email and text message to over 40,000 ACP consumers to gather feedback on the application, enrollment, and de-enrollment processes. USAC will use the results to enhance our systems and communications and will continue to solicit input from consumers in 2023. Finally, USAC and FCC built awareness of ACP by collaborating on outreach campaigns with federal agencies, such as the U.S. Social Security Administration and the U.S. Department of Education, that administer ACP qualifying programs. In 2023, we will continue to partner with state and federal agencies to foster program awareness and understanding and ease consumer burden through information sharing.

In 2023, USAC will continue to track the performance of the National Verifier system and the related operational processes, including those performed by the Lifeline Support Center and the ACP Support Center, 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 2022 for Lifeline was one second for the majority of applications that did not require a manual review. Additionally, we use several performance metrics to ensure we are responsive to Lifeline stakeholders.

Finally, the FCC will launch two pilot programs in 2023 - the “Your Home, Your Internet Pilot Program” and the “ACP Navigator Pilot Program” - that will grant pilot participants access to the National Verifier to assist consumers in completing and submitting the ACP application. The application window opened on November 21, 2022 and closed on January 9, 2023. The “Your Home, Your Internet Pilot Program” and the “ACP Navigator Pilot Program” are expected to begin in March 2023.

Appendix: States/Territories Currently Participating in the National Verifier

State	Connection to State Data Source?	Automated Data Connections Established	Lifeline Applications Received in 2022
Alabama	No	FPHA ²⁶ , CMS ²⁷ , VA ²⁸	471,916
Alaska	No	FPHA, CMS, VA	17,093
America Samoa	No	FPHA, VA	1,782
Arizona ²⁹	Yes	SNAP ³⁰ , FPHA, Tribal TANF ³¹ , CMS, VA	507,715
Arkansas	No	FPHA, CMS, VA	324,710
California	No	N/A	109,519
Colorado	Yes	SNAP, Medicaid ³² , FPHA, CMS, VA	291,311
Connecticut	Yes	SNAP, FPHA, CMS, VA	213,583
Delaware	No	FPHA, CMS, VA	62,208
District of Columbia	No	FPHA, CMS, VA	99,819
Florida	Yes	FPHA, SNAP, Medicaid, CMS, VA	1,374,974
Georgia	Yes	FPHA, SNAP, Medicaid, CMS, VA	1,258,168
Guam	No	FPHA, VA	1,419
Hawaii	No	FPHA, CMS, VA	57,007
Idaho	No	FPHA, CMS, VA	49,907
Illinois	No	FPHA, CMS, VA	939,620
Indiana	Yes	FPHA, SNAP, Medicaid, CMS, VA	563,192
Iowa	Yes	FPHA, SNAP, CMS, VA	144,965
Kansas	No	FPHA, CMS, VA	124,923
Kentucky	Yes	FPHA, SNAP, Medicaid, CMS, VA	532,312
Louisiana	No	FPHA, CMS, VA	747,960
Maine	No	FPHA, CMS, VA	57,266
Maryland	No	FPHA, CMS, VA	422,122
Massachusetts	No	FPHA, CMS, VA	381,319

²⁶ FPHA is Federal Public Housing Assistance.

²⁷ CMS is Centers for Medicare & Medicaid Services and refers to the Federal Database.

²⁸ VA is Veterans and Survivors Pension Benefit.

²⁹ The connection for Arizona deployed in the first quarter for 2023.

³⁰ SNAP is the Supplemental Nutrition Assistance Program.

³¹ TANF is Temporary Assistance for Needy Families.

³² Medicaid refers to the State Database.

Michigan	Yes	FPHA, SNAP, Medicaid, SSI ³³ , CMS, VA	944,129
Minnesota	Yes	FPHA, SNAP, Medicaid, CMS, VA	233,680
Mississippi	Yes	SNAP, FPHA, CMS, VA	429,892
Missouri	Yes	SNAP, Medicaid, FPHA, CMS, VA	423,504
Montana	No	FPHA, CMS, VA	28,312
Nebraska	No	FPHA, CMS, VA	42,077
Nevada	Yes	FPHA, SNAP, Medicaid, CMS, VA	310,128
New Hampshire	No	FPHA, CMS, VA	41,838
New Jersey	No	FPHA, CMS, VA	479,421
New Mexico	Yes	SNAP, FPHA, Medicaid, CMS, VA	179,658
New York	No	FPHA, CMS, VA	1,737,553
North Carolina	Yes	SNAP, FPHA, CMS, VA	676,904
North Dakota	No	FPHA, CMS, VA	19,085
Northern Mariana Islands	No	FPHA, VA	2,517
Ohio	No	FPHA, CMS, VA	1,097,716
Oklahoma	No	FPHA, CMS, VA	413,140
Oregon	Yes	SNAP, Medicaid, SSI*	41,562
Pennsylvania	Yes	SNAP, Medicaid, FPHA, CMS, VA	1,048,427
Puerto Rico	Yes	SNAP, FPHA, CMS, VA	826,829
Rhode Island	No	FPHA, CMS, VA	68,931
South Carolina	Yes	FPHA, SNAP, CMS, VA	459,015
South Dakota	No	FPHA, CMS, VA	17,986
Tennessee	Yes	SNAP, FPHA, CMS, VA	589,226
Texas	Yes	SNAP, Medicaid*	-
Utah	Yes	SNAP, Medicaid, FPHA, CMS, VA	99,511
Vermont	No	FPHA, CMS, VA	25,444
Virgin Islands	No	FPHA, CMS, VA	2,000
Virginia	Yes	SNAP, Medicaid, FPHA, CMS, VA	484,314

³³ SSI is Supplemental Security Income.

Washington	Yes	FHPA, SNAP, Medicaid, CMS, VA	395,486
West Virginia	No	FPHA, CMS, VA	209,811
Wisconsin	Yes	FPHA, SNAP, Medicaid, SSI, CMS, VA	357,690
Wyoming	No	Medicaid, FPHA, CMS, VA	10,435
TOTAL			20,451,031

* 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.