

CHICAGO

2017

National Lifeline Association

LIFELINE WORKSHOP



National Verifier

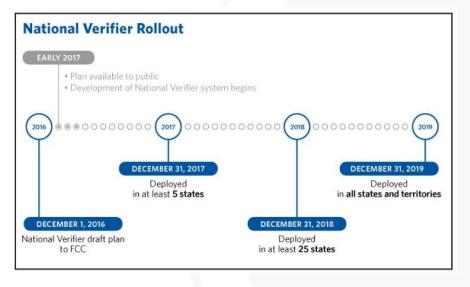
Chuck Campbell CGM, LLC



National Verifier



- USAC Taking Responsibility for Eligibility Determination.
- Mandated in the 2016 Lifeline Modernization Order.
- RFP Process initiated by BCG in Two Parts. Accenture Awarded Bid to Build Platform. Call Center Partner has not yet been announced.



- Rollout Targeted for December '17 Through December '19.
- Considerable Political Capital Associated with the Project.
- Lifeline Program Budget Expands to Estimated \$40M to Support the Platform.
- First Wave of States Announced:
 CO, MS, MT, NM, UT, WY

Part 1: Migration & Re-verification



- All Existing Lifeline Subscribers Must be "Reverified" Prior to Entering the National Verifier Database.
- Reverification Includes confirmation of valid Eligibility, Identity, Address, and a Duplicate Check. Will be Performed by NV.
- Eligibility Check:

Step 1: Dip Subscriber in All Available Eligibility Databases **Step 2:** For All Subscribers that Fail Step 1, Eligibility Proof Documents Must Be Provided to the National Verifier, Which Were Obtained After July 1, 2017.

State	Qualifying Programs with Automated Data Sources
Colorado	SNAP, Medicaid, Federal Public Housing
Mississippi	SNAP, Federal Public Housing
Montana	Federal Public Housing
New Mexico	SNAP, Medicaid, Federal Public Housing
Utah	SNAP, Medicaid, Federal Public Housing
Wyoming	Federal Public Housing

^{*}Generally, Valid Eligibility Document Must Include Subscriber's Name and not be Expired.





Identity Check

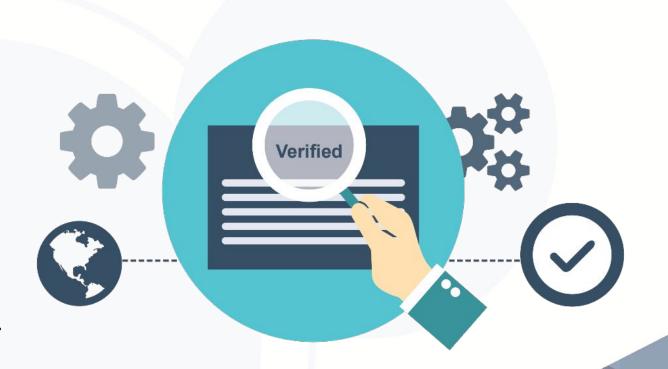
- **Step 1:** Dip Subscriber into Lexis/Nexis (TPIV) Database.
- **Step 2:** For All Subscribers that Fail Step 1, Identity Proof Doc Must Be Provided to NV.

Address Check

- **Step 1:** Dip Subscriber Address into USPS AMS Database. Will also Determine if IEH Form is Required from Subscriber.
- **Step 2:** For All Subscribers that Fail Step 1, Address Proof Doc Must Be Provided to NV.

Duplicate Check

 Step 1: Dip Subscriber's PII Against Active NLAD Subscriber Base.





Part 1: Migration & Re-verification (cont'd)

- Additionally, a New Certification/Enrollment Form Must be Obtained from Subscriber if Existing Certification Form is More Than [X] Months Old at Time of State Launch
- Example...For States Launching in First Wave with Documentation Cut-off Date of July 1, 2017.
 - For All Subscribers Enrolled Prior to Documentation Cutoff Date (July 1, 2017):

 Must Have Successful dip in Eligibility database OR Provide New Proof of Eligibility Doc and a Newly Executed Certification/Enrollment Form. "New" is defined as Obtained After July 1, '17.
 - For All Subscriber Enrolled After Documentation Cutoff Date:

 Must Have Successful dip in Eligibility database OR Provide Proof of Eligibility Doc.

Part 2: Enrollment



- On Course to Require Subscriber to Interact Directly with NV, and Remove Existing Electronic API Communication Between NV and ETC.
 - Disables Efficient, Automated Process that Currently Serves 99% of Enrollments.
 - Would Establish a Two-Decision Process That will Drive Applicant Confusion.
 - Would Require Applicant to Enter their PII Twice, on Each of Two Sites/Apps.
 - Not Compliant with 2016 Lifeline Modernization Order.
 - Disadvantages On-Line/e-commerce Enrollments.
 - Much More Costly for NV. They'll Have to Handle 50% More Applications.
 - Threatens Existing ETC Controls over Enrollment Attempts And Provides No Safe Harbor from Audit Findings.
- Industry Proposed an Alternative Solution that Would Retain APIs.

Part 3: Recertification



- Generally, the NV will Assume Responsibility for Annual Recertification Once a State Launches.
- Generally, If a Subscriber's Annual Recertification Date Occurs Within the First 6 Months After Migration, the Reverification Process will Count as Recertification.
- Key Elements to the Historically Successful Fed Process Remain:
 - Eligibility Proof Captured at Time of Benefit-Port Checks the Recertification Box; Resets Clock to One Year from that Date.
 - Eligibility Proof is not Required for end-of-year Recertification.
 - ETC Can Remain Actively Involved in the Recertification Effort.

