National Verifier Reverification Process Webinar – March 2019 Launch

June 4, 2019

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

- A copy of the slide deck is in the "Handouts" section of the webinar panel

Universal Service Administrative Co.

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Course Objectives
Reverification Process

At the end of the course, you will…

…be able to:

- Plan a process to submit documentation to USAC for the reverification of your current consumers

- Identify which types of documents you need to submit for each consumer

…understand:

- Requirements & deadlines for the reverification process

- Your role in the process, including if you choose to opt-out of USAC-conducted outreach

- What documents the National Verifier will accept

Course Overview

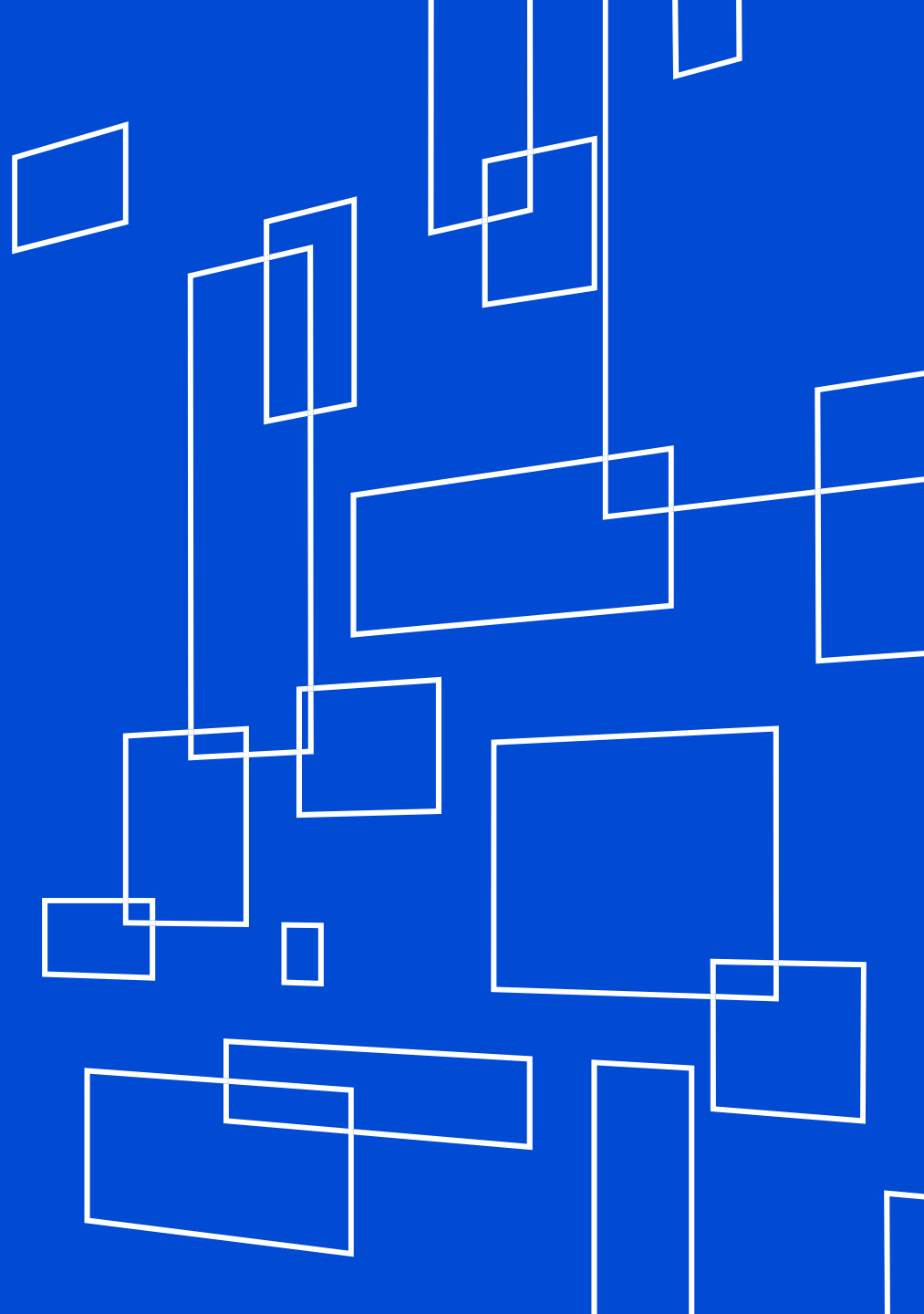**01 | OVERVIEW OF THE REVERIFICATION PROCESS**

02 | NLAD REPORTS

03 | STEP-BY-STEP REVERIFICATION PROCESS

04 | USAC-CONDUCTED OUTREACH AND THE OPT-OUT PROCESS

05 | ACCEPTABLE DOCUMENTATION

06 | SUBMITTING TO USAC

Section 1: Overview of the Reverification Process

Reverification vs. Recertification
What is reverification?

Reverification

- A separate, one-time process that is associated only with bringing current Lifeline subscribers into the National Verifier

- Requires a current subscriber to pass same eligibility checks as a new subscriber that enrolls through the National Verifier

- *Timeline will vary by NV Launch*

Recertification

- Annual process of confirming continued eligibility for the Lifeline benefit via self-certification

- Per the Lifeline rules, ***does not*** require eligibility documentation

- Subscribers who pass *reverification* must be *recertified* one year following the date of their successful reverification

- *Existed before the National Verifier*

Overview of the Reverification Process
March 2019 Reverification Groups

Group 1: Recent subscribers that enrolled October 1, 2018 through March 11, 2019

Group 2: Subscribers that enrolled April 1, 2017 through September 30, 2018

Group 3: Subscribers that enrolled prior to April 1, 2017

Group 4: Subscribers enrolled through the legacy NLAD process during the soft launch period (enrolled March 12, 2019 through June 10, 2019)

Overview of the Reverification Process
Automated Database Checks

Reverification utilizes several checks to ensure that existing subscribers are eligible for Lifeline.

Automated Database Checks	If automated check fails…
Automated eligibility databases	Requires proof of eligibility
Third Party Identity Verification (TPIV), including checking whether the subscriber is deceased	Requires proof of identity and/or proof of life
USPS Address Matching Service (AMS)	Requires documentation of geo-coordinates or other proof of address
NLAD Duplicate Address	Requires an Independent Economic Household (IEH) form

Please see USAC's Acceptable Documentation Guidelines for additional information.

Overview of the Reverification Process
Service Provider On-Hand Document Submission

If the National Verifier **cannot** verify a subscriber's eligibility through automated checks, service providers will be required to submit any available documentation they have on hand for failed subscribers.

- USAC will open a 45 day window for service providers to submit documentation they have on hand for all subscribers with failures.

Note on documentation: On-hand certifications and documentation for *program/income* eligibility (Medicaid, SNAP, etc.) are only acceptable for Groups 1 & 4.

- For Groups 2 & 3, only AMS, TPIV, Deceased, and IEH errors can be resolved with existing (on-hand) documentation. *Service providers should not submit certifications or program eligibility documents for subscribers in Groups 2 & 3.*

- USAC will reach out to subscribers in Groups 2 & 3 (subscribers who enrolled prior to October 2018) for such documentation as needed.

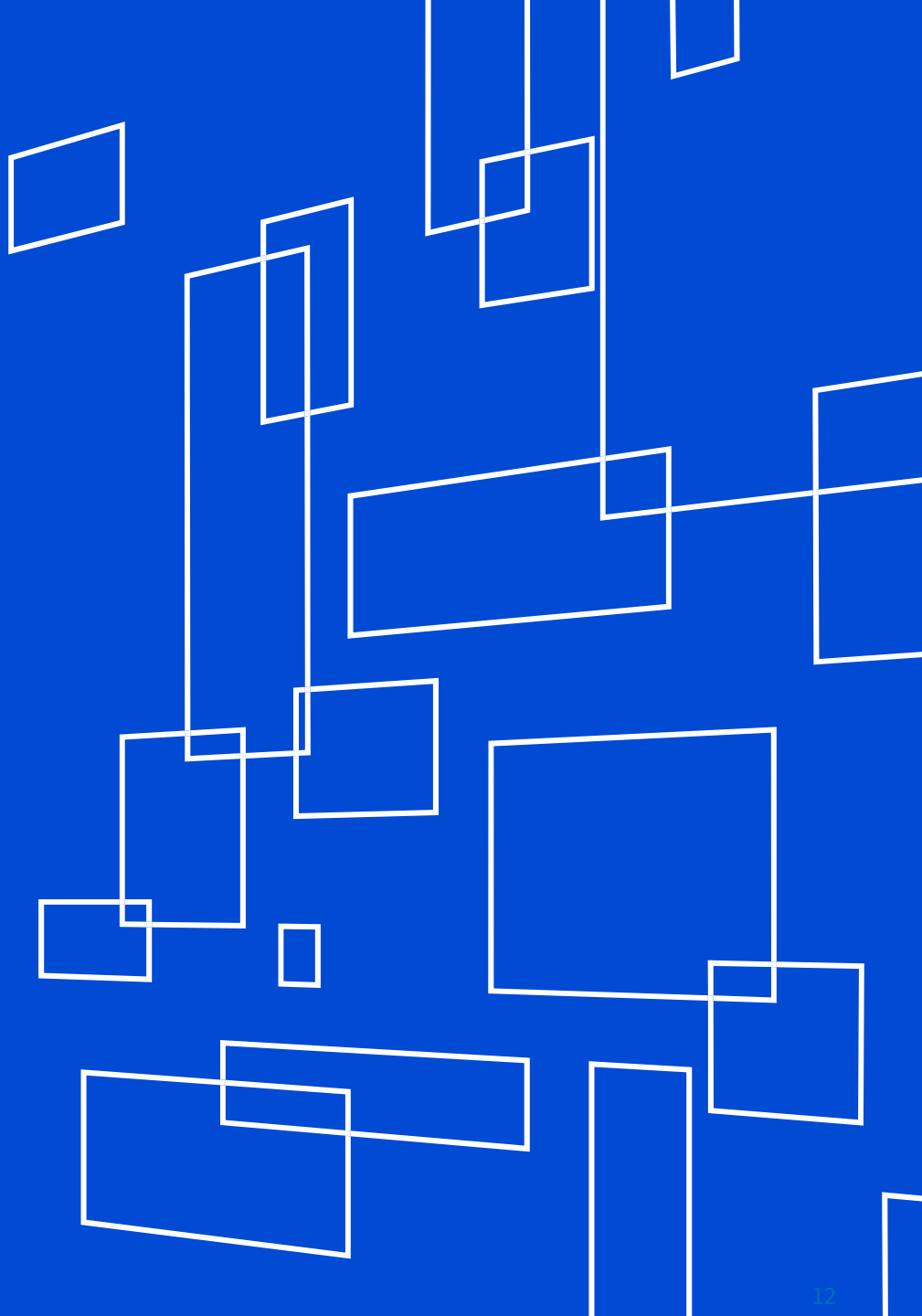# Overview of the Reverification Process
USAC Communications

USAC will make several announcements (via email and the USAC website) regarding the reverification process and window openings.

- **On-hand Documentation Submission:** Opens a 45-day window for service providers to provide on-hand documentation to USAC.
- **Reminders:** Notifications to service providers reminding them of upcoming document submission deadlines.
- **USAC Outreach to Subscribers:** USAC will notify service providers when outreach is conducted to subscribers who require additional documentation to complete reverification. Subscribers will be given 60 days to respond with documentation.
- **De-enrollments:** USAC will notify any affected service providers before any subscribers are de-enrolled for failing to reverify.

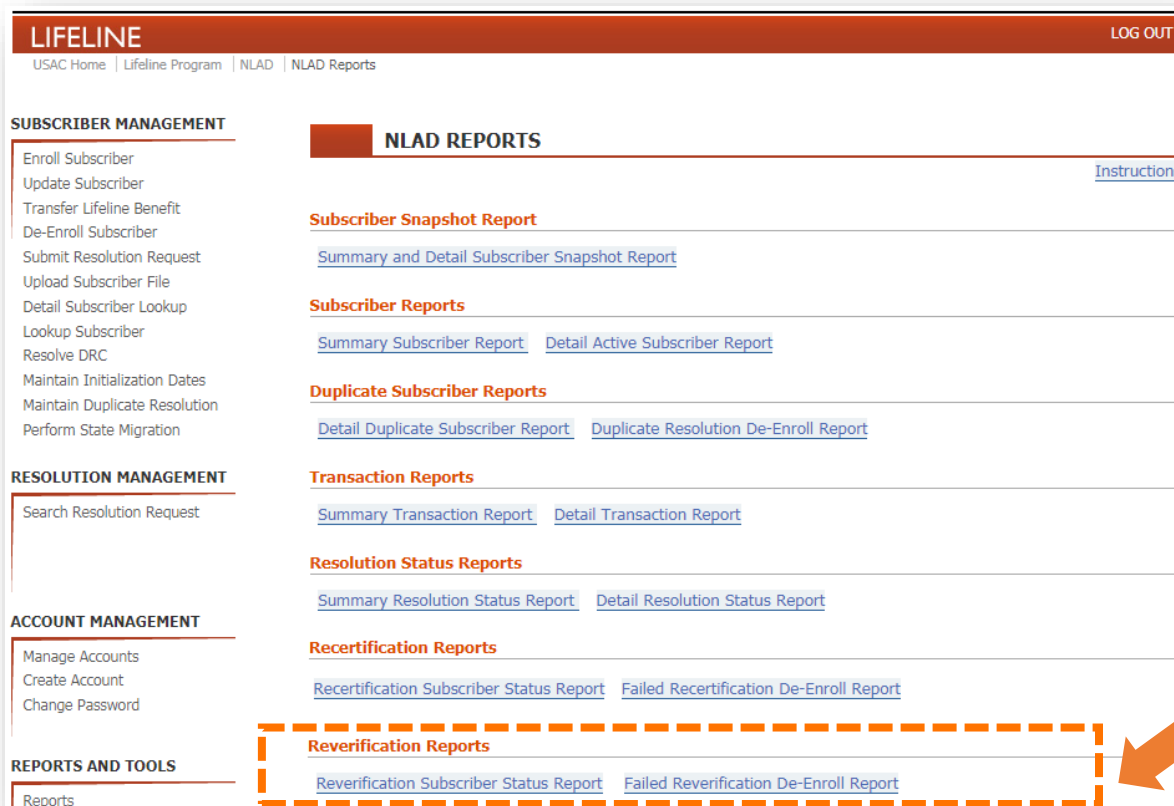**Note:** To be added to the March 2019 launch list, email LifelineProgram@usac.org

Section 2: NLAD Reports

The **Reverification Subscriber Status Report** provides service providers with the reverification status for each of their consumers.

Where to find the **Reverification Subscriber Status Report** in NLAD

Reverification Subscriber Status Report page in NLAD

The **Reverification Subscriber Status Report**:

- Available in NLAD upon the completion of USAC's automated reverification checks for each subscriber and is updated as documentation reviews are conducted

- Updated daily, but the report is subject to change
    - Service providers should only take action when USAC makes official announcements

- Shows whether a subscriber has passed reverification, and, if they haven't, which errors still need to be resolved for that subscriber

- Shows whether documentation was reviewed for each error and whether the documentation was approved or rejected

NLAD Reports
Reverification Process

The **Reverification Subscriber Status Report** provides the status for each of the following potential errors.

Error	This field indicates…
Data Source Check Fail	If the subscriber failed the automated eligibility check
TPIV DOB Failure	If the subscriber failed the date of birth check
TPIV SSN Failure	If the subscriber failed the SSN check
TPIV Not Found Failure	If the subscriber failed the identity check
AMS Fail	If the subscriber failed the address check
Duplicate Address Failure	If the subscriber failed the duplicate address check
Cert Form Required	If the subscriber is required to provide a certification form to pass rever

In the **Reverification Subscriber Status Report**, errors and resolutions are in separate columns.

Column Type	Description
Failure	Y – indicates a failed check, that requires additional documentation
	N – indicates a passed check, and no documentation is required
Resolution	Blank - indicates that no review of documentation has occurred
	Y – indicates that documentation has been reviewed that resolved the error
	N – indicates that documentation has been reviewed that did not resolve the error.

After the reverification process is complete, USAC will conduct de-enrollments of subscribers that have not qualified. The **Failed Reverification De-Enroll Report** will show which consumers failed the reverification process and have been de-enrolled from NLAD.

- The report will be updated several times as USAC conducts new de-enrollments.

Section 3: Step-by-Step Reverification Process

Step-by-Step
Reverification Process

1. Once USAC makes an announcement opening the on-hand submission window, log into NLAD to view the **Reverification Subscriber Status Report**.

2. Look at the failures for your subscribers and gather any documentation you have on hand that would resolve the failures.

   - For Groups 2 & 3: Remember, only AMS, TPIV, Deceased, and IEH errors can be resolved with existing (on-hand) documentation. Program/income eligibility documentation and certification forms (Lifeline application forms) on hand with the service provider *will not be accepted* for these groups. Please do not submit them.

3. Label the documents; prepare for submission to USAC.

   - Use the National Verifier's naming conventions and submission instructions

4. Send the documents to USAC within 45 days after USAC's on hand document submission announcement.

   - Preferred: Send electronic files via USAC's secure webpage

   - Alternative: Mail paper items to USAC

6. Once USAC completes the reviews of the documentation you submitted in the initial 45-day window, the **Reverification Subscriber Status Report** will show the remaining errors that USAC will be reaching out to subscribers to resolve.

7. USAC will conduct outreach to subscribers to collect documentation that will resolve the errors for each subscriber. USAC will provide subscribers 60 days to submit documentation.

8. USAC will de-enroll subscribers that do not submit acceptable documentation to USAC by the deadline, and de-enrolled subscribers will appear on the **Failed Reverification De-Enroll Report**.

Note: USAC will collect documentation to resolve any remaining errors for subscribers in all four groups unless service providers opt out

Start dates are subject to change.

Section 4: USAC-Conducted Outreach & the Opt-Out Process

Consumer Outreach
Reverification Process

USAC will conduct outreach to subscribers who require additional documentation to complete reverification. Subscribers will be given 60 days to respond with documentation.

- Subscribers who require new program or income eligibility documentation will be provided a copy of the National Verifier Application Form to send back with their eligibility proof.

- Subscribers with an open duplicate address failure will be provided a copy of the Independent Economic Household worksheet to return to USAC.

- Subscribers with a TPIV (including deceased) error and/or an AMS error will be provided acceptable documentation guidelines in order to successfully submit documentation.

Consumer Outreach
Reverification Process

Service providers may reach out to applicable subscribers before the 60-day reverification window to inform them about USAC and the reverification process. Correspondence may include:

- General information about USAC and the requirement to reverify their eligibility to keep their benefits

- USAC will reach out to them and request personal documentation from them

- If they do not respond to USAC's outreach, they may lose their Lifeline benefit

Service providers **should not**:

- Provide or estimate deadlines for responding to USAC outreach

- Allow subscribers to respond directly to service provider with requested documentation

Note: USAC will provide notice to ETCs at least 10 days prior to conducting outreach to subscribers.

Opt Out of USAC-Conducted Outreach
Reverification Process

Service providers may opt out of USAC-conducted outreach and choose to reach out to their subscribers instead. Service providers that opt-out of USAC-conducted outreach have several additional requirements.

- Service providers *must* ensure that *all* subscribers that have not passed reverification after USAC's initial review are contacted and given the opportunity to prove eligibility.

- The notice sent to subscribers by service providers must be in writing (separate from the subscriber's bill and in clear, easy to understand language), must indicate what documentation (or type of document) is needed, and must provide exactly 60 days for the subscriber to respond.

- Service providers must collect the documentation received from subscribers (cannot direct subscribers to mail directly to the Lifeline Support Center), must submit the documents to USAC by the date they are due (see timeline on *next slide)*, and must follow all document submission guidelines.
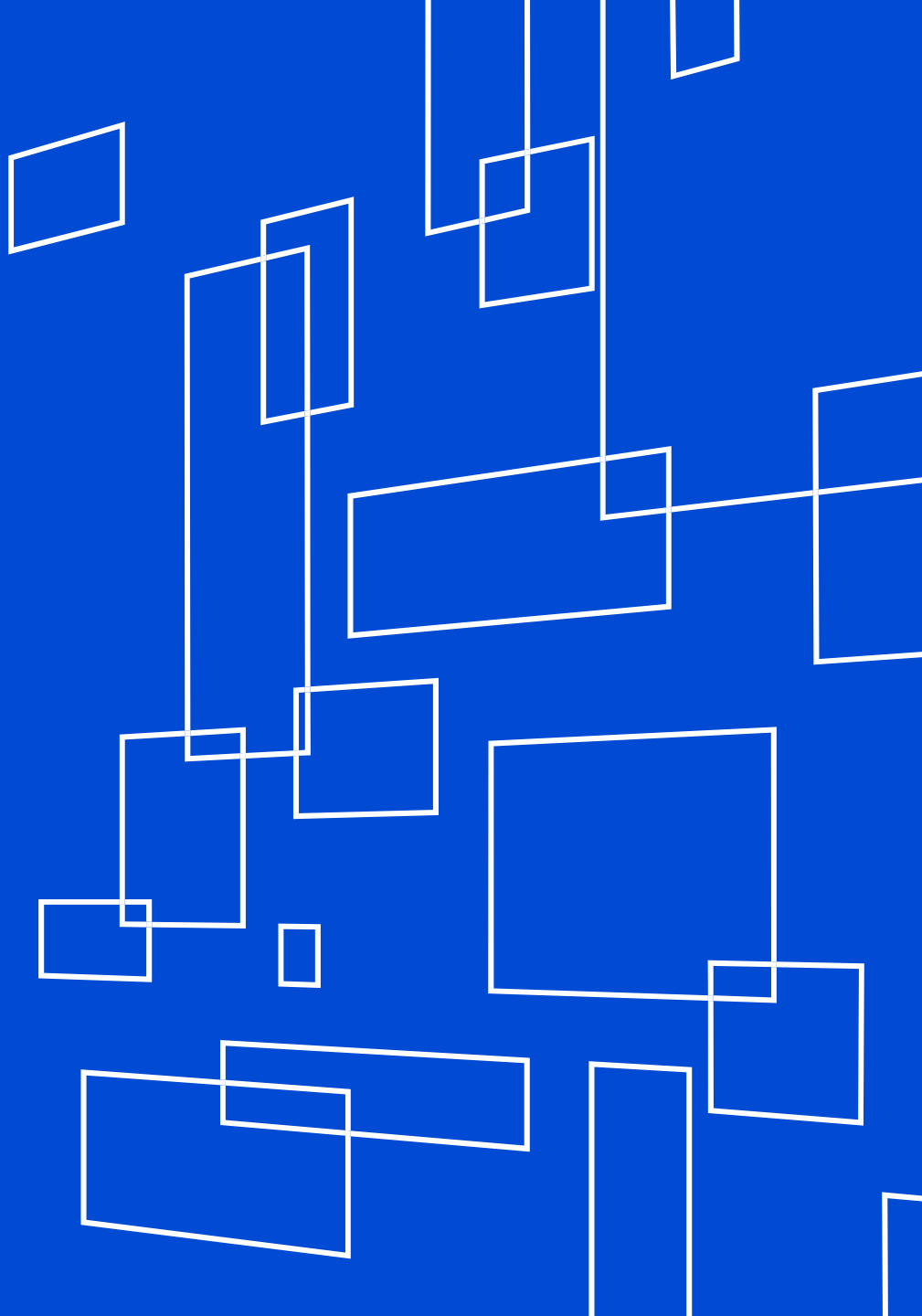
Opt Out of USAC-Conducted Outreach
Reverification Process Timelines

Service providers who opt out of USAC-conducted outreach will have the following timelines.

1. Opt-out service providers will have **45 days** to provide all on-hand documentation for Groups 1 – 4 that would resolve open failures for their subscribers (except program/income eligibility documentation and certifications for *Groups 2 & 3*). This step is the same for opt-out as it is for every other service provider.

2. Once USAC completes initial reviews and makes an announcement that outreach is beginning, opt-out service providers will have **90 days** to submit to USAC any documentation collected for *Group 1 & 2* subscribers and **120 days** for *Group 3 and 4* subscribers. The 90- and 120-day windows include the 60 days service providers must give subscribers to respond.

The opt-out period for March 2019 launch starts today, June 4, 2019, and ends on June 18, 2019. The link to the opt-out form is available [here](#) and will be emailed to all March 2019 launch service providers.

Section 5: Acceptable Documentation

Acceptable Documentation
National Verifier – Eligibility

Documentation that proves participation in a Lifeline qualifying program must include:

- The consumer's name, or the name of consumer's benefit qualifying person (BQP);

- The name of the Lifeline-qualifying program, such as SNAP;

- The government or Tribal program administrator or the managed care organization (MCO) that issued the document; and

- An issue date within the last 12 months or a future expiration date that aligns with the benefit period.
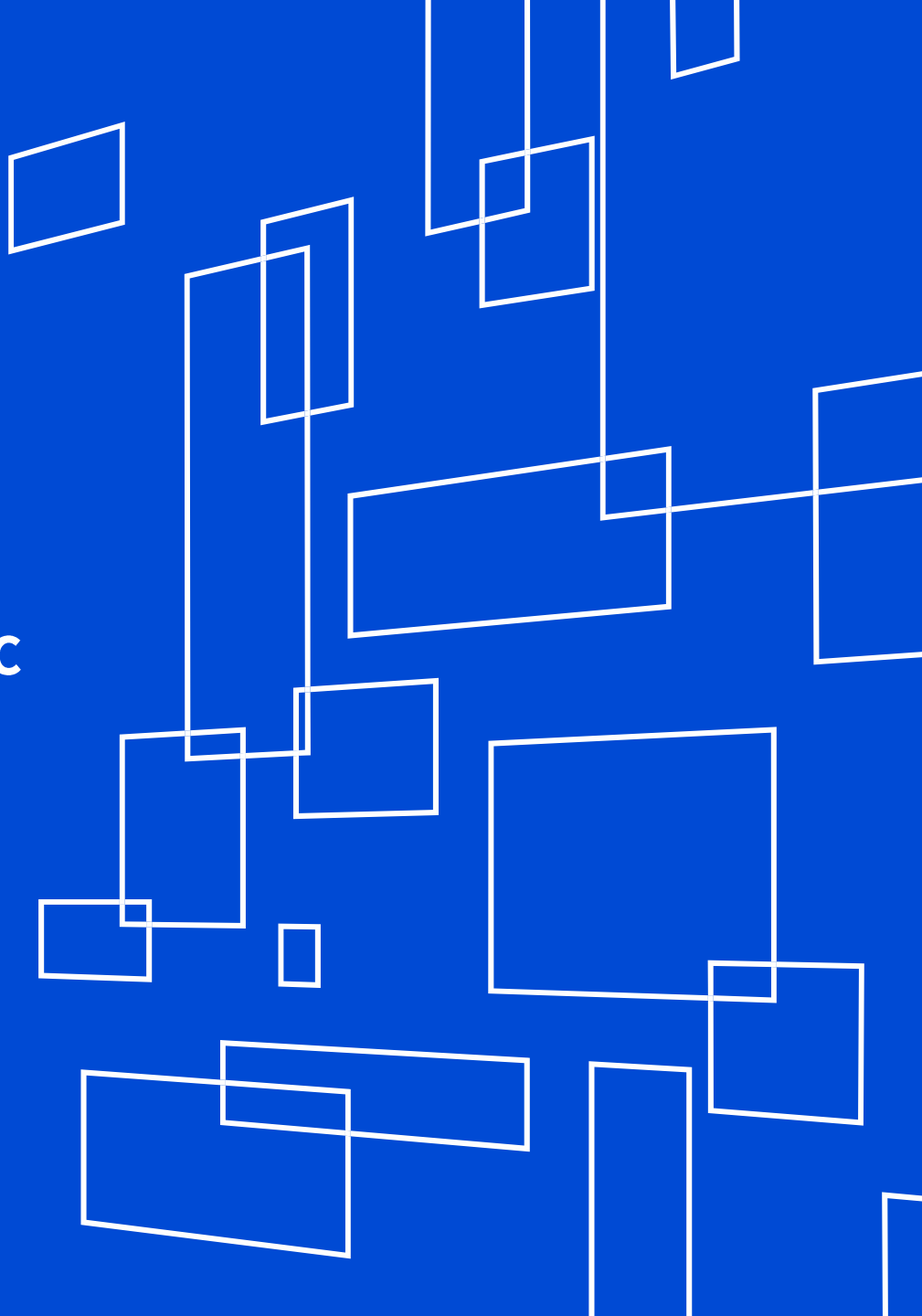
Acceptable Documentation
National Verifier - Other

- Visit our website for details regarding acceptable documentation for income.

- The website also includes types of acceptable documentation for:

  - Proof of identity (TPIV dispute resolution)
  - Proof of Life (Deceased dispute resolution)
  - Proof of address (AMS dispute resolution)
  - Benefit qualifying persons (BQP)

Section 6: Submitting to USAC

Submitting to USAC
How to Submit Documents to USAC

Submission options:

1.   Provide documents via USAC's secure webpage (preferred)

2.   Mail paper documents to USAC

USAC will not accept documentation until after the respective March 2019 launch Reverification Announcements are made.

For mailed in documents, the postmarked date must meet the deadline for each window.

Submitting to USAC
Via Secure Webpage

- Prepare a single PDF document per consumer

  - Submit all documentation as one PDF per consumer

  - Use the naming convention ApplicationID.pdf
    for example, XXX-123-4X56.pdf

  - Use the Application ID shown on the Reverification Subscriber Status Report

- Combine the batch of consumer PDFs into a single .zip file

  - Use the naming convention
    nv_reverification_SACname_MMDDYYYY_HHMMSS.zip
    for example, nv_reverification_americantelco_12152017_153056.zip

  - For the hours minutes and seconds, please use a 24-hour clock

- Upload the .zip file to the secure webpage

  - Upload the completed reverification .zip files to the "Reverification" folder on the secure webpage

Submitting to USAC
Via Mail

- Mail paper documents to USAC

  - Use the <u>required cover page</u> for each consumer showing only their application ID (as shown in the Reverification Subscriber Status Report) and last name

  - Use the cover sheets to create separation between each consumer's documentation (do not staple or paper clip). Use a cover sheet any time you are mailing documents for a consumer for reverification.

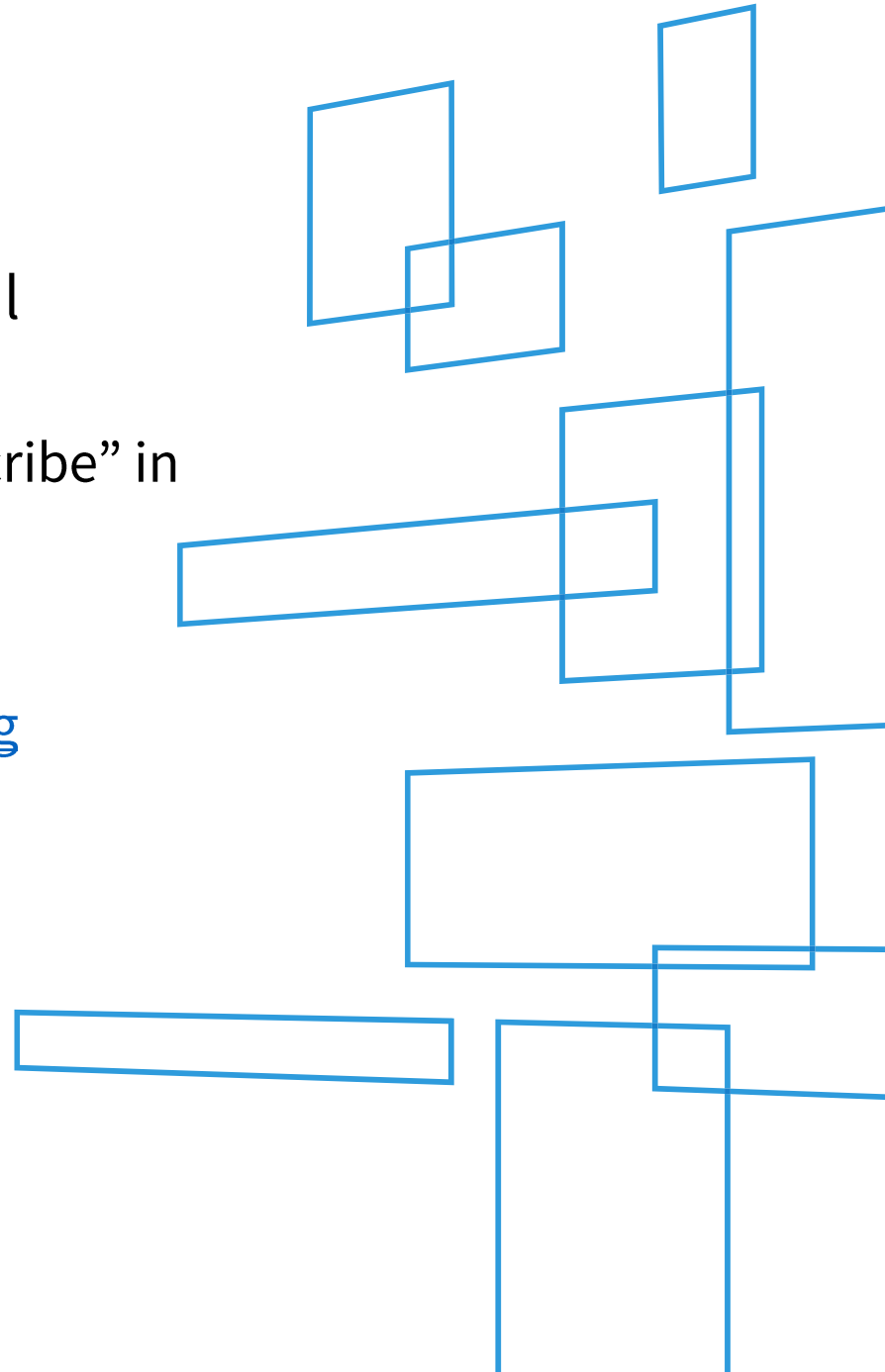- Mailing address

  USAC Lifeline Support Center

  P.O. Box 7081

  London, KY 40742

Questions?

Thank You!

- Thank you for joining us!

- Sign up for Lifeline Program email updates and upcoming events
  - Visit usac.org/li and click "Subscribe" in the upper right hand corner

- Need help? Contact us!

  - General: LifelineSupport@usac.org

  - Specific reverification questions: LiVerifications@usac.org

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