



January 2023

AFFORDABLE BROADBAND

FCC Could Improve
Performance Goals
and Measures,
Consumer Outreach,
and Fraud Risk
Management

GAO Highlights

Highlights of [GAO-23-105399](#), a report to congressional requesters

Why GAO Did This Study

Broadband, or high-speed internet, is critical since everyday activities increasingly occur online, as highlighted by the COVID-19 pandemic. Yet the inability to afford broadband presents barriers to access for some and contributes to the gap between those with and without access, known as the “digital divide.” As required by statute, FCC launched the Affordable Connectivity Program in December 2021 to help low-income households afford broadband, building from FCC’s May 2021 launch of the predecessor Emergency Broadband Benefit program.

GAO was asked to review FCC’s implementation of the program. This report assesses FCC’s program efforts in: (1) establishing performance goals and measures, (2) conducting outreach, and (3) managing fraud risks. GAO reviewed program documentation, including outreach materials translated into five non-English languages; analyzed enrollment data from May 2021 to September 2022; interviewed FCC officials; and compared FCC’s efforts in each area to applicable leading practices identified in prior GAO work or other federal sources.

What GAO Recommends

GAO is making nine recommendations, including that FCC improve its program goals and measures, revise its language translation process, develop a consumer outreach plan, and develop and implement various processes for managing fraud risks. FCC agreed with our recommendations and described its plans to address each one.

View [GAO-23-105399](#). For more information, contact Andrew Von Ah at (202) 512-2834 or vonaha@gao.gov.

January 2023

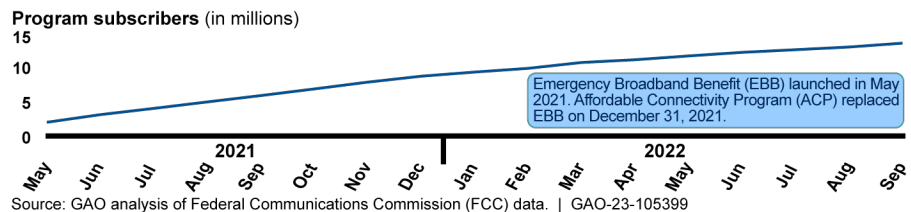
AFFORDABLE BROADBAND

FCC Could Improve Performance Goals and Measures, Consumer Outreach, and Fraud Risk Management

What GAO Found

The Federal Communications Commission’s (FCC) Affordable Connectivity Program offers eligible low-income households discounts on the cost of their broadband service and certain devices. FCC reimburses participating internet service providers for providing these discounts. Since launching, the program has grown to include over 14-million subscribers.

FCC Affordable Connectivity Program’s Subscribers, May 2021–September 2022



FCC established some performance goals and measures for the program. However, the goals and measures do not fully align with key attributes of effective performance management. For example, FCC’s goals and measures lack specificity and clearly defined targets, raising questions about how effective these goals and measures will be at helping FCC gauge the program’s achievements and identify improvements.

FCC has also engaged in various outreach efforts to raise ACP’s awareness and translated its outreach materials into non-English languages to reach eligible households with limited-English proficiency. However, GAO reviewed a selection of these materials and the process to translate them and found that they did not fully align with leading practices for consumer content or for developing translated language products. For example, the translations’ quality varied due to lack of clarity and incompleteness. Also, FCC’s translation process lacked elements that could have improved the materials, such as testing with the target audience. FCC has also not developed a plan to guide its overall outreach efforts. Quality translations are key to informing eligible households with limited-English proficiency, which may include communities FCC has indicated are important to reach. A comprehensive plan to guide its outreach efforts would help ensure funds dedicated to outreach are used most effectively.

FCC has taken steps to manage fraud risks in the program, but FCC’s efforts do not fully align with selected leading practices in GAO’s Fraud Risk Framework. For example, FCC has conducted a fraud risk assessment but has not developed an antifraud strategy to address the identified risks. It also has not developed a process to conduct such risk assessments regularly. Further, FCC has not developed processes to monitor certain antifraud controls. GAO identified weaknesses in these controls, including potential duplicate subscribers, subscribers allegedly receiving fixed broadband at PO Boxes and commercial mailboxes, and subscribers with broadband providers’ retail locations as their primary or mailing addresses. Without regular fraud risk assessments, an antifraud strategy, and sufficient monitoring of controls, FCC may not be able to effectively prevent and detect fraud in this over \$14 billion program.

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Abbreviations

ACP	Affordable Connectivity Program
EBB	Emergency Broadband Benefit program
FAQ	frequently asked questions
FCC	Federal Communications Commission
IIJA	Infrastructure Investment and Jobs Act
PII	personally identifiable information
USAC	Universal Service Administrative Company
Verifier	National Lifeline Eligibility Verifier

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January 18, 2023

The Honorable Roger F. Wicker
United States Senate

The Honorable John Thune
United States Senate

Broadband, or high-speed internet, has become critical for daily life as everyday activities like work, school, health care appointments, and access to economic opportunity and civic engagement increasingly occur online. The COVID-19 pandemic has underscored the importance of access to broadband and highlighted the gap between those with and without access, known as the “digital divide.” Yet, the inability to afford broadband service presents barriers to access, particularly for low-income households. The Federal Communications Commission (FCC) has reported that these households have lower rates of home broadband subscriptions.¹ Further, a nationally representative survey by *Consumer Reports* reported that nearly a third of respondents who lack a broadband subscription said it was because it costs too much, while about a quarter who do have broadband said they find it difficult to afford.² Regarding rates of home broadband subscription, the U.S. Census Bureau has also reported that households with limited-English proficiency lag behind other households.³

As required by statute, FCC created the Affordable Connectivity Program (ACP), the successor to the Emergency Broadband Benefit program (EBB). FCC established EBB to offer eligible low-income households discounts on the cost of broadband service and certain devices, and to reimburse internet service providers that participate in the program

¹*In the Matter of Inquiry Concerning Deployment of Advanced Telecommunications Capability to all Americans in a Reasonable and Timely Fashion*, Fourteenth Broadband Deployment Report, FCC 21-18, para. 47 (2021).

²Consumer Reports, *Broadband Survey: A Nationally Representative Multi-Mode Survey* (July 2021).

³U.S. Census Bureau, *Computer and Internet Use in the United States: 2018* (Washington, D.C.: April 2021).

(participating providers) for these discounts.⁴ In November 2021, the Infrastructure Investment and Jobs Act (IIJA) made several changes to the program to transform it from a temporary, emergency program to a longer-term program known as ACP, and provided an additional \$14.2 billion in funding.⁵ The IIJA also included new provisions on conducting outreach to eligible households to raise awareness of ACP. As required by the IIJA, FCC launched ACP on December 31, 2021, building from its launch of EBB in May 2021. FCC established ACP's final rules in January 2022, after considering public comments submitted by stakeholders.⁶

Although ACP is new, like its predecessor, EBB, it builds from and relies in part on the operation of FCC's Lifeline program, which has provided eligible low-income households discounts on broadband service since 2016. For example, the not-for-profit Universal Service Administrative Company (USAC) administers both ACP and Lifeline on behalf of FCC, and both programs use the same systems for household eligibility verification, enrollment in the program, and participating provider reimbursement claims. We and others have previously reported on the susceptibility of Lifeline to fraud, and FCC has imposed millions of dollars in penalties on providers for apparent program violations.⁷ Some stakeholders have raised concerns about program integrity for ACP, given the program's connections to Lifeline, while others have highlighted the positive role that ACP can play in closing the digital divide.

⁴The December 2020 Consolidated Appropriations Act directed FCC to establish this program. Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, div. N, tit. IX, § 904, 134 Stat. 1182, 2129-36.

⁵The \$14.2 billion was in addition to the \$3.2 billion previously provided for EBB. The Infrastructure Investment and Jobs Act (IIJA), Pub. L. No. 117-58, § 60502(a)(1)(A), (a)(2), 135 Stat. 429, 1238-39 (2020) (authorizing the Affordable Connectivity Program); div. J, tit. IV, 135 Stat. at 1382 (providing additional funding). This program is now codified in 47 U.S.C. § 1752.

⁶*In the Matter of Affordable Connectivity Program, Emergency Broadband Benefit Program*, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-2 (2022).

⁷See, for example, GAO, *Telecommunications: Additional Action Needed to Address Significant Risks in FCC's Lifeline Program*, [GAO-17-538](#) (Washington, D.C.: May 30, 2017); and Department of Justice, Office of Public Affairs, *TracFone Wireless to Pay \$13.4 Million to Settle False Claims Relating to FCC's Lifeline Program*, Press Release Number 22-323 (Apr. 4, 2022). The identification of improper payments could suggest that a program is vulnerable to fraud; however, not all improper payments are fraudulent.

You asked us to review FCC's implementation of ACP.⁸ This report examines the extent to which FCC's ACP efforts align with relevant, selected leading practices in: (1) establishing performance goals and measures; (2) conducting outreach; and (3) managing fraud risks.

To assess FCC's efforts to establish ACP performance goals and measures, we reviewed documentation and data. For example, we reviewed the IIJA and records in FCC's ACP proceeding. For additional context on ACP's performance, we analyzed enrollment data from May 2021 to September 2022, which covers the beginning of EBB to the end of the third quarter following the launch of ACP. We assessed the reliability of these data and determined that they were sufficiently reliable for the purposes of our reporting objective. We assessed FCC's efforts against leading practices for performance goals and measures, including the key attributes for such goals and measures identified in our prior work.⁹

To assess FCC's ACP outreach efforts, we also reviewed agency documentation. For example, we reviewed FCC's ACP outreach materials (including webpages and items from the outreach toolkit) and FCC's outreach plan for EBB (the predecessor program). To assess FCC's outreach materials for households with limited-English proficiency, we reviewed a selection of FCC's non-English ACP outreach materials in Chinese, French, Korean, Spanish, and Vietnamese, as well as FCC's language translation process for developing these materials. We assessed how well the non-English materials aligned with applicable leading practices for consumer-oriented content drawn from various

⁸Senator Wicker's request was in his role as Ranking Member of the Senate Committee on Commerce, Science, and Transportation in the 117th Congress, and Senator Thune's request was in his role as the Ranking Member of that committee's Subcommittee on Communications, Media, and Broadband.

⁹GAO, *Agencies' Annual Performance Plans Under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking*, [GAO/GGD/AIMD-10.1.18](#) (Washington, D.C.: February 1998); *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, [GAO/GGD-10.1.20](#) (Washington, D.C.: April 1998); and *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002). These reports establish guides for assessing and evaluating agency performance plans and attributes of effective performance goals and measures, and we have reiterated these practices in our reporting on agencies' efforts to manage for results. See <https://www.gao.gov/leading-practices-managing-results-government>.

federal sources that we have used in prior work.¹⁰ We also assessed FCC's translation process against applicable recommended practices from the U.S. Census Bureau for developing public-facing translated products.¹¹ We assessed FCC's EBB outreach plan against the leading practices for consumer education planning identified in our prior work.¹²

To assess FCC's efforts to manage ACP fraud risks, we reviewed documentation and data. For example, we reviewed FCC's fraud risk assessment for ACP and relevant program policies and guidance. Additionally, we analyzed a snapshot of ACP enrollment data as of April 1, 2022, and matched relevant elements of these data against U.S. Postal Service and Social Security Administration data. We assessed the reliability of these data and determined that they were sufficiently reliable for the purposes of our reporting objective. We assessed FCC's fraud risk management activities against selected leading practices in our Fraud Risk Framework.¹³

Finally, for additional agency information and context on all of our objectives, we interviewed FCC and USAC officials and a selection of 27 stakeholders. We interviewed stakeholder representatives from 8 industry associations; 5 state, local, and tribal entities; and 14 advocacy groups selected to obtain a variety of viewpoints from a cross-section of interests. While their views are not generalizable to all stakeholders, they provided us with a variety of perspectives.¹⁴ Similarly, we reviewed comments

¹⁰U.S. Digital Service, *Digital Services Playbook*, accessed Dec. 10, 2021, <https://playbook.cio.gov/>; U.S. Web Design System, *Design Principles*, accessed Dec. 10, 2021, <https://designsystem.digital.gov/design-principles/>; and General Services Administration, *Top 10 Best Practices for Multilingual Websites*, accessed Dec. 10, 2021, <https://digital.gov/resources/top-10-best-practices-for-multilingual-websites/>.

¹¹U.S. Census Bureau, *Developing Public-Facing Language Products: Guidance From the 2020 Census Language Program* (Washington, D.C.: Nov. 3, 2021). According to this guidance, the bureau developed this product to share detailed information on how the agency successfully developed and executed the 2020 Census language program, which translated over 7 million words for more than 2,500 projects.

¹²GAO, *Digital Television Transition: Increased Federal Planning and Risk Management Could Further Facilitate the DTV Transition*, [GAO-08-43](#) (Washington, D.C.: Nov. 19, 2007).

¹³GAO, *A Framework for Managing Fraud Risks in Federal Programs*, [GAO-15-593SP](#) (Washington, D.C.: July 2015).

¹⁴Throughout this report, we refer to "some" stakeholders if representatives from 2–5 entities expressed the view (and "several" if 6–10, and "many" if 11 or more).

submitted by stakeholders in FCC's ACP proceeding. Appendix I describes our objectives, scope, and methodology in greater detail.

We conducted this performance audit from October 2021 to January 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

Background

The Affordable Connectivity Program

ACP provides eligible low-income households with monthly discounts on the cost of their broadband service and a one-time discount on the cost of certain devices. Eligible households can receive a discount of up to \$30 per month (\$75 for those on tribal lands) on their broadband service, and a one-time discount of up to \$100 on a tablet, laptop, or desktop computer if the household contributes more than \$10 but less than \$50 toward the device's purchase price.¹⁵ To be eligible, a household must meet the eligibility criteria for a participating provider's own low-income broadband assistance program or one of the following conditions:

- have total income at or below 200 percent of the Federal Poverty Guidelines;¹⁶
- participate in Lifeline or certain other government assistance programs;¹⁷

¹⁵This means the total cost of the device to the household, including discount, can be no more than \$150. Some providers offer tablets, for example, at this price point or may offer additional discounts to meet this price point.

¹⁶The Department of Health and Human Services issues these guidelines each year based on a household's size and location. For example, 200 percent of the 2022 guidelines could range from a single-person household that resides in one of the 48 contiguous states or the District of Columbia that earns \$27,180, to an 8-person household in Alaska that earns \$116,580.

¹⁷These programs include Federal Public Housing Assistance; Medicaid; the National School Lunch or Breakfast Programs, including through the Department of Agriculture's Community Eligibility Provision; the Special Supplemental Nutrition Program for Women, Infants, and Children; the Supplemental Nutrition Assistance Program; Supplemental Security Income; and Veterans Pension or Survivor Benefits.

-
- participate in certain government assistance programs and live on qualifying tribal land;¹⁸ or
 - have received a federal Pell grant during the current award year.

A household can apply to the program by mail, online, or through a participating provider. To process applications, FCC uses a modified version of the same online tool it uses for Lifeline. Known as the National Lifeline Eligibility Verifier (Verifier), FCC completed its launch of this tool in 2020 in response to concerns about Lifeline fraud.¹⁹ Historically, providers verified that applicants met Lifeline eligibility requirements before providing them with discounted service. In response to concerns that FCC's reliance on providers to make such eligibility determinations left the program vulnerable to fraud, FCC established the Verifier to shift responsibility for eligibility verification from providers to USAC.

The Verifier relies on automated connections to federal and state benefits databases and other automated sources to validate an applicant's identity, address, and participation in qualifying programs.²⁰ When applicants cannot be automatically verified, they must submit documentation to USAC for manual review. An applicant may also apply in person with the assistance of a participating provider, or through a provider's website if the provider has established an interface between its website and the Verifier. Alternatively, a provider may use its own FCC-approved alternative verification process to determine eligibility (in

¹⁸These programs include Bureau of Indian Affairs General Assistance; the Food Distribution Program on Indian Reservations; Tribal Head Start (only if the household qualified through the program's income standard); and Tribal Temporary Assistance for Needy Families. FCC's definition of tribal lands for ACP purposes includes "any federally recognized Indian tribe's reservation, pueblo, or colony, including former reservations in Oklahoma; Alaska Native regions established pursuant to the Alaska Native Claims Settlement Act (85 Stat. 688); Indian allotments; Hawaiian Home Lands - areas held in trust for Native Hawaiians by the state of Hawaii, pursuant to the Hawaiian Homes Commission Act, 1920 July 9, 1921, 42 Stat. 108, et. seq., as amended; and any land designated as such by the Commission for purposes of this subpart pursuant to the designation process in § 54.412." 47 C.F.R. § 54.400(e).

¹⁹We previously reported on the Verifier's implementation. See, GAO, *Telecommunications: FCC Has Implemented the Lifeline National Verifier but Should Improve Consumer Awareness and Experience*, [GAO-21-235](#) (Washington, D.C.: Jan. 28, 2021).

²⁰According to USAC reporting as of January 2022, the Verifier has database connections with 2 federal agencies (the Department of Housing and Urban Development and Centers for Medicare and Medicaid Services) and 23 states and territories (Colorado, 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).

addition to, or instead of, the Verifier), or—if the applicant is qualifying through a child or dependent who participates in the free and reduced price school lunch or breakfast programs—may rely on schools for verification. If a household already participates in Lifeline, it need not re-verify its eligibility for ACP.

To subscribe to ACP once deemed eligible, applicants must contact a participating provider to select a broadband service plan and have the provider enroll them in the program and apply the discount. A program subscriber may choose any broadband plan that the provider offers, including mobile plans and bundled plans, though the discount cannot be applied to video services. The provider enrolls the subscriber into the program using the National Lifeline Accountability Database (the same system used for Lifeline). When entering a subscriber into this database, the provider must submit the subscriber's

1. full name,
2. full residential address,
3. date of birth,
4. phone number associated with the ACP-supported service or email,
5. date the ACP discount was initiated, and
6. method by which the subscriber qualified for the program.

A subscriber can only receive the device discount from the same provider from which it receives the service discount. Not all providers offer the device discount. Providers receive reimbursements for these discounts from FCC and manage their reimbursement claims using the Affordable Connectivity Claims System (which is built on the Lifeline Claims System).

While ACP shares similarities with Lifeline, ACP differs from Lifeline in key ways. For example:

- **Funding.** ACP is funded by appropriations from the U.S. Treasury General Fund, while Lifeline is funded by FCC's Universal Service Fund, which is in turn funded by required contributions from telecommunications providers. FCC determines the amount of contributions required from providers each quarter to support the fund's costs, and providers generally pass their contribution fees on to their customers in the form of a line item on their phone bills.

-
- **Household eligibility.** Household eligibility is more expansive under ACP. Unlike ACP, Lifeline does not include the Special Supplemental Nutrition Program for Women, Infants, and Children; the National School Lunch or Breakfast Programs; Federal Pell Grants; or a participating provider's own low-income program as qualifying programs. The income threshold for Lifeline eligibility is 135 percent of the Federal Poverty Guidelines, as opposed to 200 percent for ACP.²¹
 - **Participating providers.** More providers can participate in ACP. To participate in Lifeline, a provider must be designated as an eligible telecommunications carrier by state public utility commissions or FCC; this designation is not required to participate in ACP. Statutory and regulatory requirements are associated with being designated an eligible telecommunications carrier, such as requiring that the provider offer an evolving level of services, such as broadband speeds, throughout its service area.
 - **Discount and level of service.** ACP provides subscribers with a larger discount. Lifeline does not offer a device discount, and subscribers may only receive a broadband service discount of up to \$9.25 per month (\$34.25 for those on tribal lands) with Lifeline, as opposed to up to \$30 per month (\$75 for those on tribal lands) with ACP.²² However, households may participate in both ACP and Lifeline, if they choose, and may apply the discounts to the same or separate qualifying services, and with the same or different providers. Furthermore, providers must meet minimum standards for the Lifeline-supported services they offer, such as minimum broadband speeds, but there are no such minimum standards for ACP.

²¹Income eligibility under ACP's predecessor, EBB, was also 135 percent and EBB also did not include the Special Supplemental Nutrition Program for Women, Infants, and Children. Under EBB, households were also eligible if the household experienced a substantial loss of income due to job loss or furlough if the household's total 2020 income was at or below \$99,000 for single tax filers and \$198,000 for joint filers. A household could also qualify through participation in a provider's own COVID-19 program.

²²ACP's predecessor, EBB, also offered a larger potential service discount of up to \$50 per month.

Fraud Risk Management

Managers of federal programs are responsible for managing fraud risks and implementing practices for combating those risks.²³ The objective of fraud risk management is to ensure program integrity by continuously and strategically mitigating both the likelihood and effects of fraud. Effectively managing fraud risk helps to ensure that federal programs' services fulfill their intended purpose, that funds are spent effectively, and that assets are safeguarded. In July 2015, we issued the Fraud Risk Framework, which provides a comprehensive set of key components and leading practices that serve as a guide for agency managers to use when developing efforts to combat fraud in a strategic, risk-based way.²⁴

The Fraud Reduction and Data Analytics Act of 2015 required the Office of Management and Budget to establish guidelines for federal agencies to create controls to identify and assess fraud risks and to design and implement anti-fraud control activities, and to incorporate the leading practices from the Fraud Risk Framework in the guidelines.²⁵ Although that act was repealed in March 2020, the Payment Integrity Information Act of 2019 requires these guidelines to remain in effect, subject to modification by the Office of Management and Budget as necessary, and in consultation with GAO.²⁶ As depicted in figure 1, the framework describes leading practices within four components: (1) commit, (2) assess, (3) design and implement, and (4) evaluate and adapt.

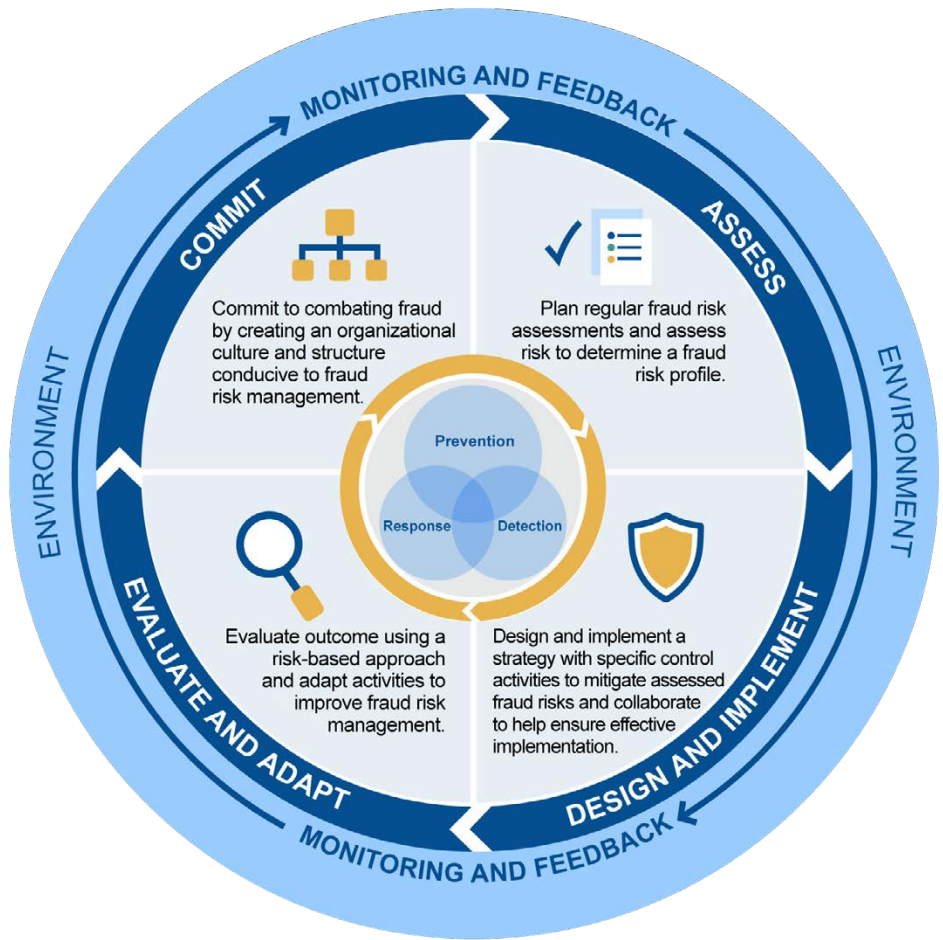
²³As we have previously reported, fraud and fraud risk are distinct concepts. Fraud—obtaining something of value through willful misrepresentation—is challenging to detect because of its deceptive nature. Fraud risk (which is a function of likelihood and impact) exists when people have an opportunity to engage in fraudulent activity, have an incentive or are under pressure to commit fraud, or are able to rationalize committing fraud. Fraud risk management is a process for ensuring program integrity by mitigating the likelihood and impact of fraud. When fraud risks can be identified and mitigated, fraud may be less likely to occur. Although the occurrence of fraud indicates there is a fraud risk, a fraud risk can exist even if actual fraud has not yet occurred or been identified.

²⁴[GAO-15-593SP](#).

²⁵Pub. L. No. 114-186, 130 Stat. 546 (2016); Payment Integrity Act of 2019 § 3(a)(4), Pub. L. No. 16-117, 134 Stat. 113, 133 (2020) (repealing The Fraud Reduction and Data Analytics Act of 2015).

²⁶Pub. L. No. 116-117, § 2(a), 134 Stat. 113, 131-32 (2020), codified at 31 U.S.C. § 3357.

Figure 1: Overview of the Fraud Risk Management Framework



Source: GAO-15-593SP. | GAO-23-105399

FCC Has Established Some Performance Goals and Measures for Its New Broadband Affordability Program, but They Do Not Fully Align with Leading Practices

FCC Has Established Some Program Performance Goals and Measures

FCC has established some performance goals and measures for ACP, as called for by leading practices.²⁷ According to leading practices, effective organizations establish performance goals and measures to help assess and manage program performance. First, organizations set goals that clearly define intended program outcomes. Second, organizations establish measures, which are concrete, observable conditions that clearly link with the goals and allow organizations to assess, track, and show the progress made toward achieving the goals. FCC established three goals for ACP and two measures for each goal (see table 1).

Table 1: FCC’s Affordable Connectivity Program’s (ACP) Performance Goals and Measures

Performance goal	Performance measures
Goal 1: Reduce the digital divide for low-income consumers	<p>Measure 1: Estimate the prior internet access of ACP subscribers and monitor responses over time and by area</p> <p>Measure 2: Analyze ACP enrollments in areas with low adoption rates</p> <p>According to FCC officials, to estimate prior access, FCC will survey subscribers. FCC’s target is to analyze data quarterly to identify if there is an overall increase in first-time broadband connections, an increase in first-time connections tied to targeted outreach, and higher than usual first-time connections for a specific sub-group of subscribers. For the second measure, FCC will pair enrollment data by geographic area with U.S. Census Bureau data and other data that FCC collects to calculate an adoption rate and compare trends in areas with the lowest rates to those with the highest. FCC aims to analyze, quarterly, areas with low rates to monitor progress relative to overall growth. FCC’s target is to identify 5 to 10 Census tracts, ZIP codes, or counties in the bottom 20 percent of broadband penetration rates that have low ACP participation to refer for targeted outreach, and 5 to 10 with high participation to examine reasons for success.</p>

²⁷[GAO/GGD/AIMD-10.1.18](#); [GAO/GGD-10.1.20](#); and [GAO-03-143](#).

Performance goal	Performance measures
Goal 2: Increase awareness of and participation in ACP	Measure 1: Monitor participation over time and by area Measure 2: Estimate ACP awareness According to FCC officials, as part of the first measure, they will pair enrollment data with Census data to calculate an ACP participation rate by state and extrapolate these findings to the ZIP code level. To estimate awareness, they will survey the general public to calculate the percentage of respondents who know about ACP and to capture information about those who do not. FCC's target is to identify at least three geographic areas or demographic groups that are the least aware of ACP to refer for targeted outreach.
Goal 3: Ensure efficient and effective administration of ACP	Measure 1: Evaluate the speed and ease of the application and reimbursement processes Measure 2: Evaluate the overall burden of the program on consumers FCC stated that it will measure the burden on consumers using the same methodology it uses for its Lifeline program to compute a monthly dollar figure.

Source: GAO analysis of *In the Matter of Affordable Connectivity Program, Emergency Broadband Benefit Program*, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-2 (2022) and other Federal Communications Commission (FCC) information. | GAO-23-105399

According to FCC officials, while FCC has not yet begun formally reporting on any of these measures, ACP's millions of subscribers to date demonstrate its progress toward achieving these goals. We analyzed program enrollment data and found that as of September 2022, about 14 million households had enrolled in ACP; this number is approximately a third of the minimum estimate of eligible households.²⁸ See appendix II for additional analysis on ACP participation.

FCC's Program Goals and Measures Do Not Fully Align with Leading Practices

In comparing FCC's ACP performance goals and measures to leading practices for effective goals and measures, we found that they did not fully align with these practices. As noted above, according to leading practices, effective organizations set program goals and measures; steps FCC has taken. However, for goals and measures to be useful for performance management, the practices indicate that they should reflect key attributes, as summarized in table 2.

Table 2: Key Attributes of Effective Performance Goals and Measures

Key attributes	Definitions
Attributes of goals and measures	Objective Goals and measures are reasonably free of significant bias or manipulation that would distort the assessment of performance and do not allow subjective considerations to dominate.
	Measurable and quantifiable Goals and measures include a quantifiable, numerical target or other value and indicate specifically what should be observed, in which population or conditions, and in what time frames.

²⁸We estimated eligibility using the U.S. Census Bureau's 2019 American Community Survey and Puerto Rico Community Survey. For more detail, see appendix I.

Key attributes		Definitions
	Primary function	Goals and measures reflect the program's primary function and core activities.
	Linkage	Goals and measures reflect the agency's strategic goals.
Additional attributes of goals	Results-oriented	Goals focus on the results the program expects to achieve. Outcome goals are included whenever possible; output goals can supplement outcome goals. Outputs are the services delivered by a program; outcomes are the results of those services.
	Crosscutting	Goals reflect the crosscutting nature of programs, when applicable. Goals of programs contributing to the same or similar outcomes are complementary to permit comparisons of results and identification of wasteful duplication, overlap, or fragmentation.
Additional attributes of measures	Clarity	Measure is clearly stated.
	Reliability	Measure provides a reliable way to assess progress and produces the same result under similar conditions.
	Limited overlap	Measure gives new information beyond that provided by other measures.
	Balance	The suite of measures covers an organization's various priorities.
	Government-wide priorities	Each measure covers a priority such as quality, timeliness, efficiency, outcomes, or cost of service.

Source: [GAO/GGD/AIMD-10.1.18](#), [GAO/GGD-10.1.20](#), and [GAO-03-143](#). | GAO-23-105399

As shown in figure 2 and discussed below, FCC's ACP performance goals and measures lack some of these key attributes, in large part because they lack specificity and clearly defined targets.

Figure 2: FCC’s Affordable Connectivity Program’s (ACP) Performance Goals and Measures Compared with Key Attributes of Effective Performance Goals and Measures

		Key attributes of effective performance goals and measures										
		Attributes of goals and measures				Additional attributes of goals		Additional attributes of measures				
Performance goal	Performance measure	Objective	Measurable and quantifiable	Primary function	Linkage	Results-oriented	Crosscutting	Clarity	Reliability	Limited overlap	Balance	Government-wide priorities
Goal 1: Reduce the digital divide for low-income consumers	Measure 1: Estimate the prior internet access of ACP subscribers and monitor responses over time and by area Measure 2: Analyze ACP enrollments in areas with low adoption rates	⊖	⊖	✓	✓	✓	⊖	⊖	⊖	⊖	✓	✓
Goal 2: Increase awareness of and participation in the program	Measure 1: Monitor participation over time and by area Measure 2: Estimate ACP awareness	⊖	⊖	✓	✓	✓	⊖	⊖	⊖	⊖	✓	✓
Goal 3: Ensure efficient and effective administration of the program	Measure 1: Evaluate the speed and ease of the application and reimbursement processes Measure 2: Evaluate the overall burden of the program on consumers	⊖	⊖	⊖	✓	⊖	⊖	⊖	⊖	✓	✓	✓

 The goal and measure(s) aligned with the attribute
  The goal and measure(s) did not fully align with the attribute

Source: GAO analysis of Federal Communications Commission (FCC) information and GAO/GGD/AIMD-10.1.18, GAO/GGD-10.1.20, and GAO-03-143. | GAO-23-105399

FCC’s goals and measures largely align with some of the attributes of effective goals and measures; specifically, those related to reflecting the program’s primary functions and government-wide priorities, linking with strategic goals, and being results-oriented and balanced. For example, the goal to reduce the digital divide reflects the program’s primary function, in that a primary function of the program is to address broadband affordability for low-income households and in that affordability is an aspect of closing the digital divide. Similarly, regarding the goal to increase awareness and participation, the ACP final rules state that for the program to achieve its full potential, households must be clearly informed of the program’s existence, benefits, and eligibility qualifications,

and how to apply.²⁹ Accordingly, awareness is primary to the program's success, as is participation in the program.

These two goals also link to FCC's strategic goal to bring affordable broadband to 100 percent of the population, including low-income Americans, as part of addressing the digital divide, and the third goal (ensure efficient and effective administration) links with FCC's fostering operational excellence strategic goal.³⁰ The digital-divide goal is also results-oriented—since it expresses an outcome (a reduction in the digital divide) of the program's outputs (discounts on the cost of broadband service)—as is the awareness-and-participation goal, since it covers an outcome (participation) of increasing awareness. The measures for all three goals also cover various government-wide priorities such as outcomes, efficiency, and cost, and are balanced because they cover various FCC priorities.

However, FCC's current ACP goals and measures do not fully align with many of the other attributes of effective goals and measures. For example:

- **Measurability and clarity.** All three goals and their corresponding measures are not expressed in a quantifiable manner, and all of the measures also lack clarity. For example, none of the goals or measures define a specific, numerical target. For instance, regarding the measures on prior internet access and enrollment in areas with low adoption, FCC has identified time frames and attempted to set targets for each measure, but the targets are vague and not numerical. Similarly, the measure on speed and ease of the application and reimbursement processes does not define any specific targets, populations, conditions, or time frames. The measures' lack of specificity also means they lack clarity. For example, the specific program achievements that FCC is trying to measure (e.g., a certain number of new broadband connections; percentage increase in low-adoption areas; a certain level of awareness, ease, or burden; or other value) are unclear. Additionally, in the measure on participation over time and by area, it is not clear what "over time" represents, and similarly, in the applications-and-reimbursements measure, it is not clear what "ease" represents.

²⁹FCC 22-2, para. 190.

³⁰FCC, *Strategic Plan: Fiscal Years 2022-2026* (Washington, D.C.: Mar. 29, 2022).

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- **Objectivity and reliability.** The lack of specific targets and clarity means it is also unclear whether the current goals and measures will be objective or reliable measures of progress. For example, without knowing what “specific subgroups” FCC is referring to in the measure on prior internet access or what specific time periods or rate of progress FCC is aiming for in the measures on participation and awareness, FCC could present results in ways that make the results look more or less favorable. Similarly, it is unknown how FCC will weigh the subjective judgments of the different parties captured by the applications-and-reimbursements measure, to ensure objectivity when measuring performance. Regarding the measure on overall consumer burden and its monthly-dollar-figure metric, it is unclear if FCC’s methodology is reliable or aligns with the program’s primary functions or intended results. FCC intends to divide the annual expenditures of the program by the number of U.S. households to derive a monthly dollar figure. If one of the goals of the program is to increase participation and if the program’s expenditures increase as participation increases, then the program’s expenditures-per-U.S.-household will also increase. Therefore, it is unclear how this approach meaningfully conveys program performance.
 - **Crosscutting and limited overlap.** It is unclear how FCC intends to consider the crosscutting nature of Lifeline across its current ACP goals, and how some of the measures might overlap. Specifically, FCC officials have indicated FCC’s interest in incorporating data from Lifeline into its analyses. For example, in exploring first-time broadband subscribership as part of the goal to reduce the digital divide, this could mean those who were not already enrolled in Lifeline and using it to obtain broadband prior to ACP enrollment. However, the lack of specificity regarding what targets FCC is measuring means it is unclear how FCC will gauge the performance of ACP and Lifeline relative to each other. The lack of specificity on what achievements are being measured means it is also unclear how much the measures for the digital divide and participation goals will overlap, as they both entail monitoring participation rates.

ACP provides eligible households with two possible discounts: the monthly broadband service discount and the one-time device discount. However, none of FCC’s established goals and measures address performance of the device discount. FCC officials told us that FCC does not plan to separately analyze performance of this aspect of ACP. According to these officials, this is because program subscribers can only receive the device discount from the same participating provider that they receive the service discount from. As such, FCC officials said they believe

the current goals and measures already capture the device discount as well.

Stakeholders' Views on FCC's ACP Performance Goals and Measures

Many stakeholders we spoke with stressed the importance of the Federal Communications Commission (FCC) using quality information to evaluate the Affordable Connectivity Program's (ACP) performance and said it was unclear if the performance measures FCC had established would be effective. Most stakeholders generally agreed that developing more specific measures that show what the program is achieving would be necessary. For example, they cited metrics detailing how many ACP subscribers are new to ACP versus how many were already Lifeline participants, which enrollment methods subscribers are using, or the program participation rate by various demographic characteristics (such as geography, race, age, and socioeconomic status). Several stakeholders added that, for various reasons, the device discount aspect of the program has not been effective and wanted FCC to assess this aspect in order to help identify improvements.

Source: GAO analysis of information from stakeholders. | GAO-23-105399

According to FCC officials, FCC has not yet fully refined its ACP performance goals and measures because efforts to collect certain information and data are still under way. For example, FCC officials told us they intend to survey program subscribers to learn how ACP affected their internet access. These officials added that the results of that survey will then inform a broader survey of the entire country that will measure outcomes for the general public. To conduct this broader survey, FCC officials stated that FCC plans to request proposals from vendors with public survey experience. According to these officials, FCC plans to use these surveys as sources of information to refine performance measures. The officials said there is no set timeline for implementation of these surveys.

In the meantime, according to FCC officials, USAC conducted outreach to a sample of ACP subscribers in September 2022 for some of FCC's measures, and FCC's Office of Economics and Analytics has also begun analyzing some data that relates to others. These officials noted that FCC plans to establish additional targets after establishing some baselines. FCC officials also noted that the IIJA requires FCC to issue rules on the annual collection of information about the price and subscription rates of internet service offerings received by ACP subscribers.³¹ In June 2022, FCC issued a Notice of Proposed Rulemaking requesting comments on the data to be collected and mechanism for collecting these data. In this notice, FCC also proposed using these data to evaluate whether the program was achieving the established goals and asked questions about this proposal, particularly about what information it should collect to measure performance.³²

ACP represents a significant investment in helping consumers afford broadband, and effective performance goals and measures could help FCC and others gauge the program's achievements and identify opportunities for improvement. We acknowledge that collecting relevant information and data can help agencies establish baselines from which to measure progress. However, knowing what the specific goals are and what needs to be measured should drive what data and information to

³¹ See IIJA § 60502(c)(1).

³² *In the Matter of Affordable Connectivity Program*, Notice of Proposed Rulemaking, FCC 22-44, para. 12 (2022).

collect, how to collect it, and how to balance tradeoffs. For example, it is unclear how FCC's planned survey measuring outcomes for the general public will relate to ACP performance.

We also acknowledge that program subscribers must receive the device discount from the same participating provider from which they receive the broadband service discount. However, not all providers offer the device discount and not all subscribers receive it. Therefore, it is unclear how FCC's current goals and measures will capture this aspect of the program. Without more specific and clearer goals and measures, it is unclear whether FCC will be able to effectively demonstrate the program's achievements to Congress and other stakeholders.

FCC Has Engaged in Outreach for Its New Broadband Affordability Program, but Its Language Translation Process and Outreach Planning Do Not Fully Align with Leading Practices

FCC Has Engaged in Various Outreach Efforts to Raise Program Awareness

To raise awareness of ACP, FCC has completed a variety of outreach activities, including (1) creating consumer outreach materials, (2) partnering with federal agencies, and (3) engaging and leveraging other outreach partners.

- **Creating consumer outreach materials.** FCC has created a variety of outreach materials (available in English and non-English languages) to inform eligible households about the program. FCC's website has several ACP consumer-focused webpages with information about program eligibility, how to apply, and responses to frequently asked questions (FAQ). FCC has also created a toolkit with various items such as flyers and fact sheets available to download, print, and distribute. These items include those intended for outreach partners to distribute to the public and those intended for government

entities to use, including posters and a letter inviting eligible households to participate. FCC can also print these items and mail them to outreach partners across the country upon request. According to FCC documentation, from January 2022 to September 2022, FCC mailed almost 200,000 printed items to outreach partners to distribute to their communities.

- **Partnering with federal agencies.** To raise awareness of ACP, the IJJA requires FCC to work with the seven federal agencies³³ that administer programs that qualify households for ACP.³⁴ To promote ACP, FCC officials told us they have leveraged existing relationships with these agencies that they developed during outreach efforts for ACP's predecessor, EBB. See table 3 for examples.

Table 3: Examples of FCC Partnerships with Federal Agencies to Raise Awareness for the Affordable Connectivity Program (ACP)

Federal agency	Outreach effort(s) completed or planned
Department of Agriculture	According to FCC officials, they are working with the department to include information about ACP in the department's meetings with its stakeholders, who include state-level administrators of departmental programs.
Department of Education	According to FCC officials, they worked with the department to share information about ACP with Pell grant recipients for the 2020–2021 and 2021–2022 academic years via email. FCC officials said they planned to replicate this effort in future years, including the 2022–2023 academic year.
Department of Housing and Urban Development	In March 2022, FCC officials presented at a departmental webinar and gave an overview of ACP along with best practices for engaging residents of public housing, outreach, and program enrollment.
Department of Veterans Affairs	FCC officials stated that FCC will work with the department to provide digital consultations to veterans to help them learn about ACP.

³³These agencies are the Departments of Agriculture (Food Distribution Program on Indian Reservations; National School Lunch or Breakfast Programs; Special Supplemental Nutrition Program for Women, Infants, and Children; Supplemental Nutrition Assistance Program), Education (Federal Pell Grants), Health and Human Services (Medicaid, Tribal Head Start, Tribal Temporary Assistance for Needy Families), Housing and Urban Development (Federal Public Housing Assistance), Interior (Bureau of Indians Affairs General Assistance), and Veterans Affairs (Veterans Pension or Survivor Benefits), as well as the Social Security Administration (Supplemental Security Income).

³⁴The IJJA requires FCC to “collaborate with relevant Federal agencies, including to ensure relevant Federal agencies update their System of Records Notices, to ensure that a household that participates in any program that qualifies the household for the Affordable Connectivity Program is provided information about the program, including how to enroll in the Program.” IJJA § 60502(a)(3)(B)(ii). FCC concluded that it does not have the authority to compel these other agencies to do this, but directed various staff offices within FCC to fulfill this collaboration requirement through other activities. See FCC 22-2, para. 199.

Federal agency	Outreach effort(s) completed or planned
Social Security Administration	In March 2022, FCC published a guest blog post on the Social Security Administration’s website that explained the benefits of ACP and program eligibility. According to FCC officials, the Social Security Administration agreed to add information about ACP to media playing in its waiting rooms. FCC officials said the Social Security Administration also included information on ACP in a “Dear Colleague Letter,” an outreach notice the agency distributed to its stakeholders.

Source: GAO analysis of Federal Communications Commission (FCC) information. | GAO-23-105399

Note: Each of the listed agencies administer programs that qualify eligible low-income households for ACP.

FCC officials told us they are working to formalize their relationships with other agencies. For example, they are in the process of developing memorandums of understanding with some of these agencies. According to FCC officials, they have also leveraged a White House initiative to formalize commitments from other agencies and convene cross-agency meetings.³⁵

- Engaging and leveraging other outreach partners.** FCC shares information with its outreach partners—including participating providers; state, local, and tribal entities; and advocacy groups—through emails, monthly meetings, and other events. FCC sends ACP-related information to an email listserv that contains over 50,000 unique email addresses as of March 2022. FCC has also hosted monthly partner meetings to discuss program updates, and completed a number of other events to engage its outreach partners. According to FCC documentation, between November 2021 and September 2022, FCC completed about 400 presentations, discussions, “train-the-trainer” events, virtual town halls, and briefings.

FCC also leverages these outreach partners’ activities to help raise awareness of ACP. In the program’s final rules, FCC states that outreach partners’ activities, as described below, play an important role in raising awareness about the program.³⁶

Participating providers: The ACP final rules require participating providers to publicize the availability of the program and carry out public awareness campaigns. FCC gives providers flexibility in how to

³⁵In May 2022, the White House launched the website [getinternet.gov](https://www.getinternet.gov) to help raise awareness of ACP and connect eligible households with participating providers that would provide broadband service at no cost to ACP subscribers. This initiative is separate from FCC-led outreach efforts.

³⁶FCC 22-2, para. 271.

meet these requirements.³⁷ According to some industry stakeholders we spoke with, providers have various efforts to raise awareness of ACP, such as including flyers in utility bills, using radio and television advertisements, or advertising online. We reviewed a selection of 20 participating provider websites for additional context on how providers advertise ACP online and found that some of the websites did not provide detailed information about the program and some did not advertise ACP at all.³⁸ According to FCC officials, providers that do not advertise on their websites could still be considered in compliance with program rules if they advertise by other means, such as by mail and customer service calls. FCC officials also said they would likely incorporate providers' advertising efforts into future reviews of the program, which would help FCC identify non-compliance with the requirement to publicize the program.

State, local, and tribal entities: State, local, and tribal entities have also made various efforts to raise awareness of ACP. For example, in a letter submitted to FCC, Montgomery County, Maryland, described the 14 enrollment campaign events it held in June 2022 and noted that the county used these events to help eligible households enroll in ACP. Some states and cities, in collaboration with the White House, planned to text eligible residents about the program.³⁹ In comments submitted to FCC, the city of Boston described how it planned to train volunteer tax preparers to share information about ACP with those who qualify for the Earned Income Tax Credit, since these individuals often qualify for ACP. One tribal stakeholder we spoke with said that some entities have partnered with tribes to communicate with tribal elders and used other "on the ground" efforts to raise awareness.

³⁷FCC 22-2, para. 205, 207. The IIJA requires the public awareness campaign. (IIJA § 60502(3)(B)(ii)). The ACP final rules state that participating providers must publicize the availability of ACP in a manner reasonably designed to reach consumers likely to qualify and in a manner that is accessible to individuals with disabilities. FCC does not prescribe specific forms of outreach that providers must use but does establish that providers must collaborate with state agencies, public interest groups, and non-profit organizations on public awareness campaigns and provides other guidance.

³⁸At the time of our review, according to FCC data, 10 of the providers we selected accounted for nearly 80 percent of the program's subscribers.

³⁹In May 2022, the White House announced it was partnering with two states (Massachusetts and Michigan) and three cities (Mesa, Arizona; New York City; and Philadelphia) to text millions of eligible households about ACP.

Advocacy groups: Advocacy groups have also conducted a variety of outreach efforts. For example, *ACP Para Mi* (ACP For Me) is a nationwide partnership of local and national Latino organizations and community leaders working to raise awareness for the program by serving as a bilingual resource hub. This partnership provides outreach content in English and Spanish, along with a step-by-step guide for community advocates to help families navigate the ACP enrollment process. The National Digital Inclusion Alliance, a nonprofit focused on digital equity, published an extensive FAQ resource on its website, and hosted a webinar titled “What You Need to Know about the FCC Affordable Connectivity Program.”

FCC’s Language Translation Process and the Resulting Non-English Program Outreach Materials Do Not Fully Align with Leading Practices

FCC has translated ACP outreach materials into non-English languages, but we found that the materials did not always align with leading practices for consumer-oriented content.⁴⁰ Specifically, FCC translated some of its outreach materials (including webpages and items from its outreach toolkit) into multiple non-English languages for use by individuals with limited-English proficiency.⁴¹ FCC employed an original translation process used for materials it distributed when ACP launched and later began updating this process in September 2022. In reviewing a selection of the materials in five of the non-English languages (Chinese,⁴² French, Korean, Spanish, and Vietnamese), we found that the translations were not always clear and accurate or complete (compared to the English materials). We also found the translated materials did not always include elements that make them practical or help manage users’ expectations (such as directing a user to additional assistance or indicating when a user will navigate to an English-only area). See figure 3 and the discussion below.

⁴⁰U.S. Digital Service, *Digital Services Playbook*; U.S. Web Design System, *Design Principles*; and General Services Administration, *Top 10 Best Practices for Multilingual Websites*.

⁴¹The ACP consumer-oriented webpages are available in Chinese, Korean, Spanish, Tagalog, and Vietnamese. Items from the outreach toolkit are available in Arabic, Chinese, French, Haitian-Creole, Korean, Portuguese, Russian, Spanish, Tagalog, and Vietnamese.

⁴²The ACP webpages were translated into Traditional Chinese, while the outreach toolkit items were available in both Traditional and Simplified Chinese, a form of written Chinese where traditional Chinese characters have been simplified. We reviewed the webpage in Traditional Chinese and toolkit items in Simplified Chinese to ensure coverage of both forms of Chinese. For more detail, see appendix I.

Interactive graphic

Figure 3: Selection of FCC's Chinese, French, Korean, Spanish, and Vietnamese Affordable Connectivity Program (ACP) Outreach Materials Compared with Leading Practices for Consumer-Oriented Content



Print instructions

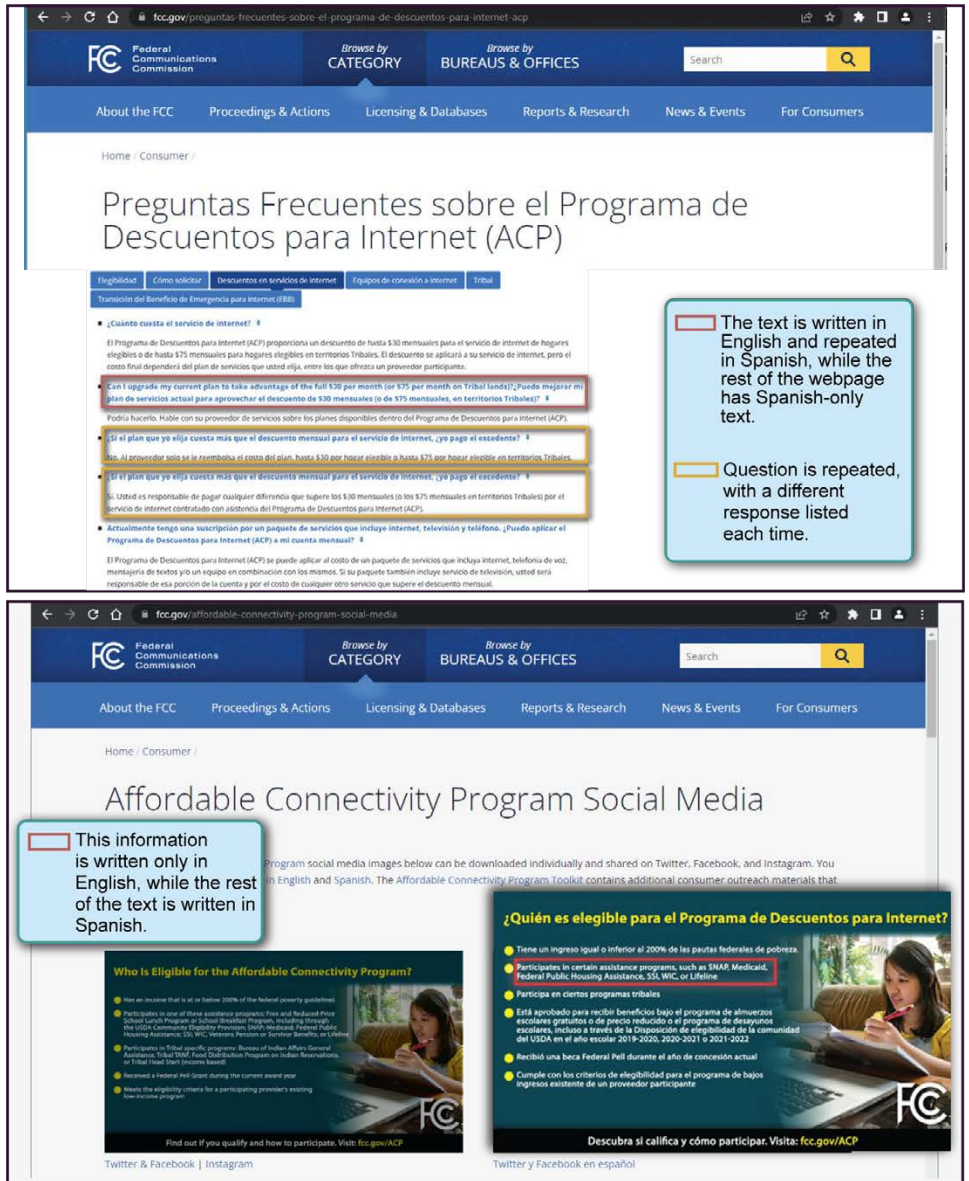
To access a printable version of this interactive graphic, see appendix III.

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- **Clarity and accuracy.** According to leading practices for consumer-oriented content, outreach materials should be written in clear, easy-to-follow language that is factually accurate, and federal documents should be identifiable as a federal product. We found that the Spanish and Chinese materials were clear and easy to understand, but some other non-English materials reviewed were difficult to understand. In particular, we found clarity issues in the Korean and Vietnamese materials. In the Korean content, we consistently found grammatical errors, spacing issues (which, in the Korean language, may confer incorrect or different meanings), and mistranslations that inadvertently changed the meaning of the text.⁴³ We also found that the Vietnamese webpages read as though they had been generated by a machine translation, as they read unnaturally and were difficult to parse.

Additionally, in most of the non-English materials we reviewed, accurate information was conveyed; headings, images, and links were accurately labeled; and hyperlinks functioned properly. However, we also found some instances where inaccurate information could confuse a user. For example, one response to a question on the Korean Consumer FAQ webpage stated that households on tribal lands may receive up to \$70 (rather than \$75) per month off their broadband service, which is correctly listed elsewhere on other Korean materials. In another instance, the Korean ACP main webpage conveyed that the participating provider (rather than the household) must contribute between \$10 and \$50 toward the purchase of the device. The Spanish Consumer FAQ webpage repeated the same question twice and listed a different response to the question each time. We also found that a Spanish social media image included English text. See figure 4 for these examples.

⁴³Korean relies on correct spacing to convey specific grammatical constructs, thus missing or incorrect spacing in written Korean can create confusion in meaning.

Figure 4: Examples of Duplicated Spanish Text on FCC’s Spanish Version of the Affordable Connectivity Program Consumer FAQ Webpage and English Text on Spanish Social Media Image



Source: <https://www.fcc.gov/preguntas-frecuentes-sobre-el-programa-de-descuentos-para-internet-acp>, and <https://www.fcc.gov/affordable-connectivity-program-social-media>, accessed on March 9, 2022. | GAO-23-105399

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- **Completeness.** Leading practices for consumer-oriented content call for the content on non-English materials to match the content on the English materials. We found that the content on the non-English outreach toolkit items generally matched their English counterparts. However, we also found that all of the non-English ACP main webpages were missing information. Most lacked hyperlinks to the FCC's Complaint Center (where consumers can file an informal complaint about ACP) and to the Consumer FAQ webpage.⁴⁴ The non-English ACP main webpages were also missing information on upcoming events and, in some cases, were missing the phone number for the ACP Support Center. Consumers can call this center to learn about the status of their application, documents needed to prove eligibility, and participating providers that service the caller's area.

In addition, the leading practices describe the importance of consistent maintenance of non-English content compared to its English version. This allows users of both versions to have a comparable experience. We found that FCC delayed updating the non-English ACP main webpages. While the English version of this webpage was updated in March 2022, the non-English versions had not been updated since January 2022.

- **Practicality.** According to leading practices, consumer-oriented content should be practical, allowing users to easily understand and complete key tasks and directing users to additional assistance. We found that all of the non-English materials we reviewed contained information to direct users to begin the application process, such as by listing instructions or directing users to the ACP website. However, although many of the non-English materials also included the ACP Support Center phone number, they did not disclose that callers could receive assistance in other non-English languages. In fact, FCC

⁴⁴According to FCC officials, not linking to the center was a deliberate choice, as it is only available in English. However, consistent with leading practices, in some other parts of its non-English webpages, FCC included an indicator signaling when a user would navigate to an English-only area.

officials told us that callers can receive assistance in up to 200 non-English languages via a third-party translator service.⁴⁵

- **Managing users' expectations.** With respect to online content, leading practices for consumer-oriented content state that the website maintain users' expectations on non-English websites by indicating when a user will navigate to an English-only area. We found that the Spanish webpages sometimes included a parenthetical *en inglés* (in English), but the other non-English webpages did not disclose when hyperlinks led to content in English.

Stakeholders' Views on the Quality of FCC's Non-English ACP Outreach Materials

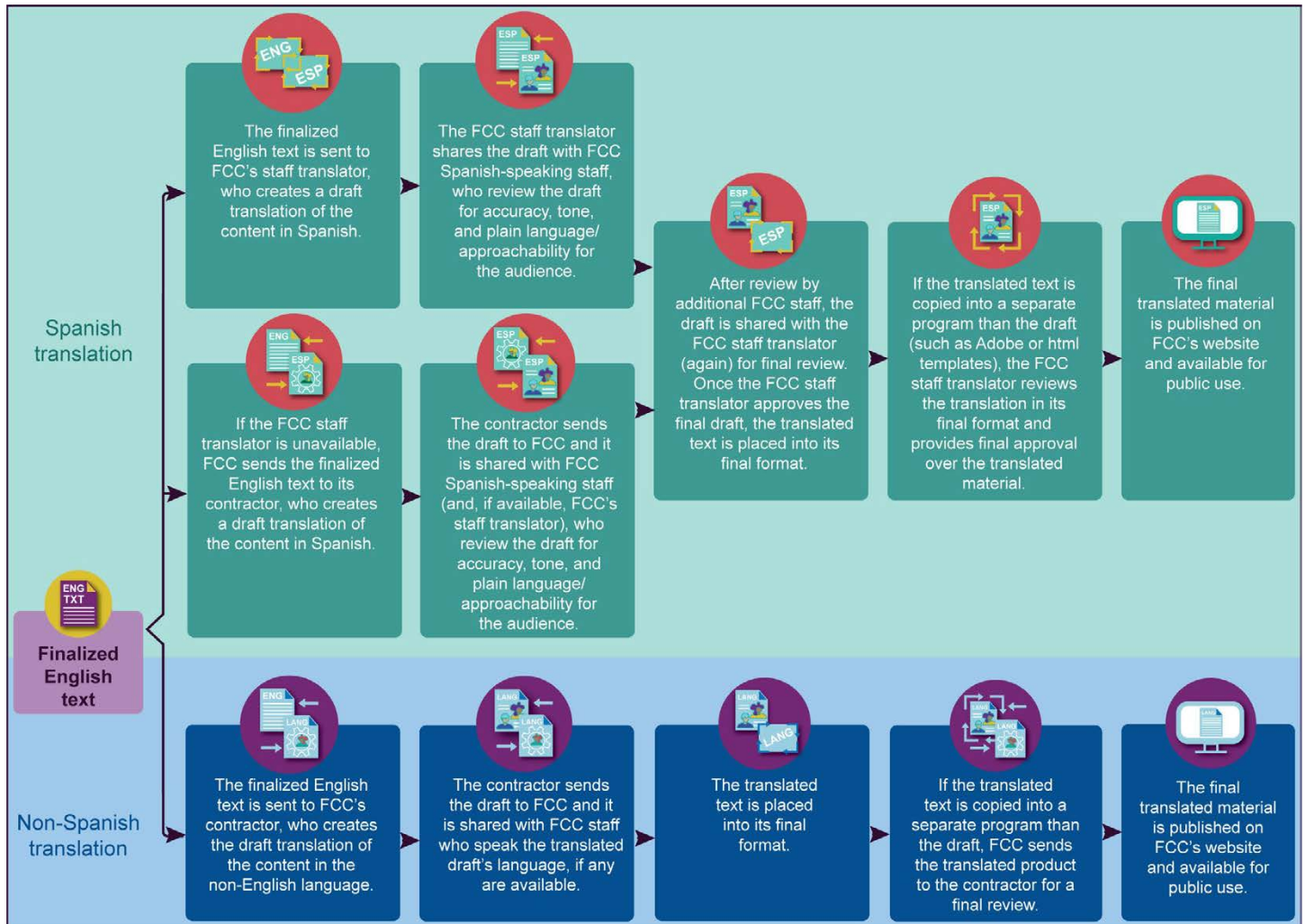
Many stakeholders we spoke with stressed the importance of non-English, culturally competent outreach materials. Some said that the Federal Communications Commission's (FCC) Affordable Connectivity Program (ACP) translations were ineffective. For example, one stakeholder that advocates for populations with limited-English proficiency said that FCC's translated materials were so poor that the group produced its own. Furthermore, when the program launched as ACP after the initial launch of the Emergency Broadband Benefit program (EBB), some stakeholders said the quality of the translated materials had not improved, even though one group had worked with FCC to improve translated EBB materials. One stakeholder said that FCC published ACP materials in Portuguese, but labeled them as Spanish. The stakeholder said FCC quickly remedied the issue.

Source: GAO analysis of information from stakeholders. | GAO-23-105399

FCC's original translation process for producing these non-English outreach materials varied slightly based on the target language. FCC primarily used an internal (or, "in-house") staff translator for Spanish translations and a language translation contractor for other non-English languages, as well as for Spanish when the staff translator was not available. See figure 5.

⁴⁵FCC officials told us that callers may request to speak with a Spanish-speaking agent. The other non-English languages are supported via a language service, which a caller may request once connected to an agent. They added that, if an interpreter is available, the interpreter joins the call and translates the conversation in real time. If an interpreter is unavailable, the caller can leave a message, which could be translated and addressed once an interpreter is available. FCC officials said that it is common for this type of service to function this way.

Figure 5: FCC’s Original Translation Process for Creating Non-English Affordable Connectivity Program Consumer Outreach Materials



Source: GAO analysis of Federal Communications Commission (FCC) information. | GAO-23-105399

According to FCC documentation, under this original process, FCC’s contractor had two quality assurance controls for translation tasks. First, translators were required to meet certain language proficiency requirements. FCC officials told us that they received documentation to verify that translators met these requirements. As a second control, FCC’s translation contract stated that the contractor would have at least two native language or proficient individuals collaborate and review the accuracy of each translation task assigned. According to FCC officials,

FCC did not receive documentation that the contractor had completed this second quality assurance control, but FCC staff had active discussions with the contractor.

We found that this original process, which FCC used to produce ACP's non-English outreach materials, did not fully align with recommended practices. In comparing FCC's original language translation process to recommended practices from U.S. Census Bureau guidance for developing public-facing translated language products, we found that FCC's process lacked certain elements that could improve the quality and effectiveness of its non-English materials. See table 4.

Table 4: Comparison of FCC's Original Translation Process to Recommended Practices for Developing Public-Facing Translated Language Products

Recommended practice	Description	How FCC's translation process aligns with the practice
1. Develop a plan for designing and producing translated products	The plan reflects the translation's goals and audience, identifies which languages and what materials will be translated, and serves to document the translation workflow process and define the roles and responsibilities of the translation team. When possible, plans are informed by data, research, and results from previous projects.	<i>Partially aligns.</i> FCC's process did not include a plan to identify the translation's goals, audience, and which languages would be supported. However, it did describe how FCC shares information on the target audience with FCC's contractor and staff translator.
2. Incorporate review and quality assurance steps into the translation process and document these steps	A first translator completes an initial draft of the translation, then a second translator (the reviewer) reviews the draft, comparing it to the English version for accuracy. As a final check, a quality assurance monitor reviews the product to identify quality assurance issues. This process is documented to ensure that all requirements have been met.	<i>Partially aligns.</i> Translated drafts were to be reviewed by at least one additional person to review the draft for accuracy. However, FCC did not require documentation to verify that the contractor completed its quality assurance processes.
3. Develop and test the product with others who represent its intended audience	After the content is translated, translators and other staff work together to ensure the translation is correctly placed into its final format, such as a webpage or flyer. Once placed, a diverse group of individuals who represent the intended audience provides feedback on the product's effectiveness.	<i>Partially aligns.</i> FCC worked with the contractor and staff translator to ensure the translated content was correctly placed in its final format. FCC considered external feedback on translations after publication, but did not test the product with a group that represented its intended audience to incorporate feedback before it was finalized.
4. Update and finalize the product based on testing results	The translation team incorporates appropriate feedback into the final product. Then, the reviewer examines the updated translation to ensure accuracy and that no other changes are needed. Team members review the final product to ensure translations were inserted correctly and all requirements have been met.	<i>Does not align.</i> FCC did not solicit feedback from its intended audience to incorporate into a final product prior to publication, so it could not update and finalize the product based on that feedback.

Source: GAO analysis of Federal Communications Commission (FCC) information and U.S. Census Bureau, *Developing Public-Facing Language Products: Guidance from the 2020 Census Language Program* (Nov. 3, 2021). | GAO-23-105399

Regarding the gaps in its translated content and translation process, FCC officials told us that the compressed timelines associated with launching ACP affected their ability to produce non-English outreach materials in full alignment with recommended practices. For example, they told us that conducting testing through focus groups or surveys would have significantly delayed the production of materials. In September 2022, FCC updated its original language translation process as part of a change in its language translations contractor. The updated process addresses some, but not all, of the gaps we identified. For example, the updated process includes additional quality assurance steps for FCC's contractor. In particular, according to documentation from FCC's contractor, an editor will review and proofread translators' work to help ensure quality, and FCC requires the contractor to provide certification of these individuals' credentials. The October 2022 performance work statement for the new contractor also includes requirements for the contractor to maintain a quality control plan and, according to documentation from the contractor, results from the contractor's quality reviews are documented. However, it is unclear how FCC is documenting that all quality assurance steps are taken for translated materials produced when FCC's internal translators and reviewers are involved for Spanish translations (which, based on the updated process, are still produced predominately by FCC staff, not the contractor).

The updated process also does not reflect an overall plan for designing and producing translated products. While some FCC and contractor documentation reference elements of a plan, such as the types of audiences and languages, it does not constitute a comprehensive plan. Additionally, the updated process—like the original one—does not include testing of the translated material with those who represent the intended audience prior to publication. Such testing could take place through a variety of methods, such as by providing the materials to stakeholder groups for feedback.

Producing quality non-English content is key to informing eligible households with limited-English proficiency, which may include households from communities FCC has indicated are important to reach. Specifically, FCC has acknowledged the importance of its outreach efforts reaching people of color, persons with disabilities, persons who live in rural or tribal areas, and others who are or have been historically unserved, marginalized, or adversely affected by persistent poverty or

inequality.⁴⁶ Without a sufficient language translation process, FCC may continue to produce and distribute non-English ACP outreach materials that lack the quality necessary to help those with limited-English proficiency understand and use the information, which could hamper their ability to enroll in the program.

FCC Has Not Developed a Consumer Outreach Plan for ACP

Although FCC has completed a variety of ACP outreach efforts, it has not developed an outreach plan to guide these activities. According to FCC officials, FCC has largely leveraged the outreach infrastructure from the program's predecessor, EBB, (such as tools, strategies, and partnerships) to inform its new, ACP outreach efforts. These officials said that FCC had not created an ACP outreach plan due to the compressed timelines for launching ACP required by the IIJA.

The FCC officials added that FCC was in the process of developing a plan that makes use of expanded outreach tools specified in the IIJA but could not provide a specific timeline of when one would be completed.⁴⁷ FCC officials told us that they are currently pursuing contracting and personnel to implement these tools, which include an outreach grant program, paid media campaigns, and focus groups. FCC has issued rules for the grant program, which will fund partners' outreach efforts, and for a separate pilot program focused on increasing ACP awareness among households that receive federal housing assistance.⁴⁸ Many stakeholders we spoke with generally agreed that these tools would increase awareness of ACP, especially the grant program.

We have previously determined that agencies should have a plan for outreach activities to help them overcome challenges that may emerge, and identified nine leading practices for such planning, as show in table 5.⁴⁹

⁴⁶FCC 22-2, para. 194.

⁴⁷IIJA § 60502(a)(3)(B)(ii), adding 47 U.S.C. § 1752(b)(10)(C).

⁴⁸*In the Matter of Affordable Connectivity Program*, Second Report and Order, FCC 22-64 (2022); and *In the Matter of Affordable Connectivity Program*, Third Report and Order, FCC 22-65 (2022).

⁴⁹[GAO-08-43](#). In 2021, we recommended that FCC develop and implement a plan to educate eligible consumers about requirements for Lifeline and the Verifier that align with these leading practices, since we found that FCC's consumer education plan for these also did not fully align with these practices. See [GAO-21-235](#). While USAC developed a plan in response to this recommendation, the recommendation remains open as of October 2022 because it does not yet fully align with the practices.

Table 5: Leading Practices for Planning Effective Consumer Outreach

Leading practice	Description
Analyze the situation	Analyze the situation, including key target dates and competing voices or messages. Review relevant past experiences to identify applicable “lessons learned” that may help guide efforts.
Identify stakeholders	Identify and engage all key stakeholders involved in outreach efforts and clarify their roles and responsibilities.
Identify credible messengers	Identify who will be delivering the messages and ensure that the source is credible with audiences.
Design media mix	Plan the media mix (e.g., online, print, broadcast) to optimize earned media (e.g., news stories, opinion editorials) and paid media.
Define goals and objectives	Define the goals of the outreach campaign and the objectives that will help the campaign meet those goals.
Identify resources	Identify available short-term and long-term budgetary and other resources.
Research target audiences	Conduct audience research and measure audience awareness. Identify any potential audience-specific obstacles, such as access to information.
Develop consistent, clear messages	Develop clear and consistent audience messages based on budget, goals, and audience research findings.
Establish metrics to measure success	Establish both process and outcome metrics to measure success in achieving objectives of the outreach campaign.

Source: GAO-08-43. | GAO-23-105399

Although FCC has not created an ACP outreach plan, FCC developed an outreach plan for the program’s predecessor, EBB. However, we found this plan did not fully align with these leading practices. Specifically, we found the EBB outreach plan partially aligned with some practices and did not align with others. For example, as part of planning a mix of different media (e.g., online, print, broadcast), the plan referenced earned media methods, but did not strategize how to optimize them with other media or specify the frequency or duration. FCC officials told us that the compressed timelines associated with launching EBB did not allow them to develop a plan that fully aligned with these practices, though they adapted their approaches as the program progressed. In response to the evolving pandemic environment, FCC used a phased outreach plan to guide its efforts when EBB launched, and FCC officials told us that they intend to build on elements of this previous plan for ACP.

ACP outreach involves numerous stakeholders and efforts, and—as established in the ACP final rules—a \$100 million budget, making it a complex undertaking that could benefit from a comprehensive plan to ensure these funds are effectively used to reach the target audience.⁵⁰

⁵⁰FCC 22-2, para. 193.

For example, as ACP continues to grow and additional stakeholders emerge, it will be even more important for FCC to align stakeholders to relay consistent messages, as inconsistent messaging could confuse households. Indeed, one stakeholder we spoke with noted that variation in messaging is likely to confuse those who may be interested in the program. While we acknowledge the compressed timelines that FCC faced and that some of FCC's planned outreach tools are still in development, a consumer outreach plan could drive the development of these tools, including the development of newer tools. For example, a plan could help guide FCC in making decisions about what mix of tools will be most effective in helping FCC meet its goal of raising awareness of and participation in the program.

FCC Has Taken Steps to Manage Fraud Risks in Its New Broadband Affordability Program, but Its Efforts Do Not Fully Align with Selected Leading Practices

FCC has taken some steps to manage fraud risks in ACP. For example, it has identified the Office of Managing Director to lead fraud risk management activities at the agency, including for ACP. Additionally, FCC assessed fraud risks in ACP in May 2022. However, some of FCC's efforts do not fully align with leading practices in the Fraud Risk Framework.⁵¹ Specifically, FCC has not established a process to ensure that fraud risk assessments for ACP occur on a regular basis or that these assessments are updated to reflect changes to the program. Further, FCC has not developed an antifraud strategy to address the risks identified in its assessment. Finally, FCC has not developed processes to monitor its fraud management activities, including certain antifraud controls, which could provide valuable information for assessing and responding to fraud risks.

⁵¹[GAO-15-593SP](#).

FCC Identified a Dedicated Entity to Lead Fraud Risk Management Activities

Fraud Risk Framework Component:

Commit to combating fraud by creating an organizational culture and structure conducive to fraud risk management



Source: [GAO-15-593SP](#). | GAO-23-105399

Consistent with a leading practice outlined in our Fraud Risk Framework, FCC identified a dedicated entity to lead fraud risk management activities across the agency. Specifically, in July 2020, FCC issued its Antifraud Directive to lay out high-level policies for managing fraud risks in its programs.⁵² The directive named FCC's Office of Managing Director as the entity to lead fraud risk management activities in FCC programs, which includes ACP. According to FCC officials, the Enterprise Risk Management Group within this office will function as the dedicated entity. As discussed further below, the dedicated entity's responsibilities for overseeing fraud risk management activities for ACP will be critical as these activities mature.

⁵²FCC, *Policy for Detecting and Deterring Fraud and Promoting Ethical Conduct within the FCC*, FCCINST 1102.6 (Washington, D.C.: July 2020).

FCC Assessed Fraud Risks for ACP but Lacks a Process to Ensure Such Assessments Occur Regularly or Are Updated

Fraud Risk Framework Component:

Plan regular fraud risk assessments and assess risks to determine a fraud risk profile



Source: [GAO-15-593SP](#). | GAO-23-105399

May 2022 Fraud Risk Assessment

In May 2022, FCC conducted a fraud risk assessment for ACP. We found that this assessment generally aligned with five leading practices for identifying and assessing fraud risks. However, FCC has not met two related leading practices for planning regular fraud risk assessments. Specifically, FCC has not (1) developed a process to conduct such assessments at regular intervals or when there are changes to the program or (2) identified specific tools, methods, and sources for gathering information about fraud risks.

FCC assessed fraud risks in ACP in May 2022. Prior to this effort, FCC had not assessed fraud risks in ACP or the program's predecessor, EBB.⁵³ We found that FCC's fraud risk assessment for ACP generally aligned with the Fraud Risk Framework's five leading practices for identifying and assessing risks. These practices include (1) identifying inherent fraud risks, (2) assessing the likelihood and impact of those risks, (3) determining fraud risk tolerance, (4) examining the suitability of existing fraud controls and prioritizing residual risks, and (5) documenting the program's fraud risk profile. For example, FCC identified and assessed 24 inherent fraud risks related to ACP and documented its assessment in a fraud risk profile. The profile summarizes risks compared to FCC's risk tolerance, related antifraud controls, and suggested mitigation efforts for each identified risk. While FCC generally followed

⁵³FCC conducted a programmatic risk assessment for EBB in May 2021. Although this risk assessment considered fraud, it was not a fraud risk assessment as outlined by leading practices in the Fraud Risk Framework.

No Process for Planning
Regular Fraud Risk
Assessments or Identifying
Information Sources

leading practices for assessing fraud risks, we identified concerns related to two aspects of the assessment, concerns that are discussed later in this report.⁵⁴

FCC has not established a process to ensure that it regularly assesses fraud risks in ACP in the future or revisits the assessment if there are changes to the program. According to the Fraud Risk Framework, a separate leading practice for fraud risk management is to plan to conduct fraud risk assessments at regular intervals and when there are changes to the program or operating environment, as assessing fraud risks is an iterative process.

FCC has not established such a process because responsibilities for these assessments—and, in turn, any processes to regularly conduct them—are not clearly defined. FCC's Antifraud Directive outlines, at a high-level, the agency's intention to manage fraud risks in its programs, including assessing fraud risks regularly. The Directive explains that fraud risks will be considered as part of the agency's broader enterprise risk-management process. The Fraud Risk Framework acknowledges that agencies may use initiatives like enterprise risk management to assess fraud risks, but that does not eliminate the need for separate and independent fraud risk-management efforts.⁵⁵ For example, assessing entity-level risks as part of enterprise risk management may not devote sufficient attention to program-level fraud risks. FCC officials stated that they understood the distinction between these concepts and explained that the agency will be assessing its programs' fraud risks separately from its enterprise risk management process. In an August 2022 presentation to its Senior Management Council, FCC noted that its next steps for fraud risk management include formalizing its governance framework for fraud risk management, including a methodology for fraud risk assessments conducted on a 3-year cycle. Currently, responsibilities and schedules for

⁵⁴The concerns related to (1) the consideration of prior programs when assessing the likelihood of inherent fraud risks and (2) the examination of existing controls and how they mitigate identified fraud risks.

⁵⁵In October 2022, the Office of Management and Budget issued an alert reminding agencies that, consistent with the guidelines contained in OMB Circular A-123, they must establish financial and administrative controls to identify and assess fraud risks. In addition, the office reminded agencies that they should adhere to the leading practices in GAO's Fraud Risk Framework as part of their efforts to effectively design, implement, and operate an internal control system that addresses fraud risks, which includes fraud risks that do not rise to the level of enterprise-wide risks. See Office of Management and Budget, *Establishing Financial and Administrative Controls to Identify and Assess Fraud Risk*, CA-23-03 (Oct. 17, 2022).

fraud risk assessments in ACP (or any FCC program) are not documented in the Antifraud Directive or other policies.

Additionally, FCC has not identified specific tools, methods, and sources for gathering information about fraud risks, which is a related leading practice for planning regular fraud risk assessments outlined in our Fraud Risk Framework. We identified an area in which FCC may have understated the likelihood of certain risks in its May 2022 fraud risk assessment by overlooking available information from the Lifeline program. As part of its assessment, FCC considered whether the identified risks had been observed in similar programs, including in EBB and Lifeline. According to the assessment, 20 of the 24 identified risks had not been observed. However, as described below, we identified multiple instances where these risks appear to have occurred in Lifeline, even though FCC's assessment indicated they have not been observed in similar programs.

- **Lack of data on non-usage of broadband service.** According to FCC's assessment, the lack of non-usage data resulting from a system not properly tracking usage could lead to participating providers receiving reimbursements for program subscribers who are not using their broadband service.⁵⁶ We identified similar issues related to two Lifeline program violations. For example, in one instance, FCC reported that a provider identified a flaw in the provider's system used to monitor its Lifeline service usage, which affected the number of subscribers that should have been de-enrolled for non-usage. FCC determined that the provider continued to seek reimbursement for ineligible subscribers.
- **Reimbursement claim falsification.** According to FCC's assessment, intentional submission of incorrect reimbursement amounts or failure to revise claims when errors are identified presents a risk of program fraud. We identified similar issues in a Lifeline program violation. Specifically, FCC reported that a provider submitted a significant amount of claims for subscribers who were ineligible or should have been de-enrolled, even after it had known of the issues. The issues included deceased subscribers and subscribers who did not use the provider's Lifeline service.

⁵⁶Non-usage refers to certain instances in which subscribers who receive their broadband service free (after discounts are applied) do not use the service.

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- **Failure of timely de-enrollment.** According to FCC’s assessment, delaying necessary de-enrollment of a subscriber could result in collection of additional months of reimbursements.⁵⁷ We identified a similar issue in a Lifeline program violation. Specifically, a provider indicated that it had received Lifeline overpayments because of its failure to de-enroll ineligible non-usage and other subscribers, even after it represented to FCC that it had corrected the issues.

Formally documenting a process to assess fraud risks regularly—with clear responsibilities for such assessments and specific tools, methods, and sources of information about fraud risks to be used in the assessment—can help ensure that fraud risk management activities are carried out. This is especially notable given that effective fraud risk management is an iterative process and that assessments are to leverage useful, available information about fraud risks facing the program.

⁵⁷Although timeframes may differ given the circumstances, ACP rules generally require providers to de-enroll subscribers who (1) are no longer eligible for the program, (2) receive duplicative support, (3) do not meet non-usage requirements, (4) fail to recertify their eligibility when required, or (5) request to be de-enrolled.

FCC Has Not Developed an Antifraud Strategy for ACP

Fraud Risk Framework Component:

Design and implement a strategy with specific control activities to mitigate assessed fraud risks and collaborate to help ensure effective implementation



Source: GAO-15-593SP. | GAO-23-105399

Although FCC has assessed fraud risks in ACP, it has not yet developed an antifraud strategy for the program based on the fraud risk profile. According to the Fraud Risk Framework, a leading practice for managers who effectively manage fraud risk is to develop and document an antifraud strategy that describes the program's activities for preventing, detecting, and responding to the risks identified in the fraud risk profile.

According to FCC officials, FCC is reviewing the actions suggested by the contractor that prepared FCC's ACP fraud risk assessment and will develop a plan for implementing those actions, as appropriate.⁵⁸ The officials said FCC is also planning to determine whether residual fraud risks—such as issues related to participating providers claiming reimbursements for subscribers who did not use the service—require additional internal controls. While these steps are important for addressing residual risks identified in the assessment, they do not constitute an antifraud strategy as outlined in our framework. Specifically, key elements of an antifraud strategy include identifying what the agency is doing to manage fraud risks in the program and roles and responsibilities for fraud risk management activities (see fig. 6).⁵⁹

⁵⁸As noted in the Fraud Risk Framework, managers consider the benefits and costs of control activities to address identified residual risks when developing an antifraud strategy.

⁵⁹As discussed above, FCC's Antifraud Directive outlines high-level policy for fraud risk management for the agency, but it does not document responsibilities for fraud risk management activities for ACP.

Figure 6: Key Elements of an Antifraud Strategy

Who is responsible for fraud risk management activities?	Establish roles and responsibilities of those involved in fraud risk management activities, such as the antifraud entity and external parties responsible for fraud controls, and communicate the role of the Office of Inspector General to investigate potential fraud.
What is the program doing to manage fraud risks?	Describe the program's activities for preventing, detecting, and responding to fraud, as well as monitoring and evaluation.
When is the program implementing fraud risk management activities?	Create timelines for implementing fraud risk management activities, as appropriate, including monitoring and evaluations.
Where is the program focusing its fraud risk management activities?	Demonstrate links to the highest internal and external residual fraud risks outlined in the fraud risk profile.
Why is fraud risk management important?	Communicate the antifraud strategy to employees and other stakeholders, and link antifraud efforts to other risk management activities, if any.

Source: GAO-15-593SP. | GAO-23-105399

Developing an antifraud strategy that aligns with the leading practices in the Fraud Risk Framework would help ensure that FCC effectively manages the risks identified in its fraud risk profile. Such a strategy would also fully and clearly establish roles and responsibilities for those involved in fraud risk management activities for ACP.

FCC Has Not Developed Processes to Monitor Its ACP Fraud Risk Management Activities, including Certain Antifraud Controls

FCC has not developed processes to comprehensively or regularly monitor its ACP fraud risk management activities, including its fraud risk assessment and certain antifraud controls. The Fraud Risk Framework notes that monitoring and evaluating the effectiveness of antifraud activities, including fraud risk assessments and antifraud controls, is a leading practice for fraud risk management. Such monitoring processes can produce useful information to support efforts to consider how existing controls mitigate fraud risks as part of a fraud risk assessment.

Fraud Risk Framework Component:

Evaluate outcomes using a risk-based approach and adapt activities to improve fraud risk management



Source: GAO-15-593SP, | GAO-23-105399

While FCC's ACP fraud risk assessment generally aligned with leading practices in the Fraud Risk Framework for conducting those assessments, as discussed above, we identified concerns related to FCC's consideration of how existing controls mitigate identified risks. The ACP fraud risk assessment acknowledges that the consideration of how existing controls mitigate fraud risks is subjective. However, we identified issues related to three major controls for ACP: (1) duplicate subscriber check, (2) identity verification, and (3) address validation.⁶⁰ FCC did not consider these issues in its fraud risk assessment because it did not comprehensively monitor these controls. The issues we identified call into question whether the controls are having their intended effect—to prevent and detect fraud—and their mitigation of identified fraud risks.⁶¹

Duplicate Subscriber Check

FCC uses its enrollment database to prevent duplicate subscribers in ACP (and Lifeline) as the ACP discounts are limited to one per household. However, we identified over 2,500 potential duplicate subscribers in the ACP enrollment data as of April 1, 2022. The specifics of these potential duplicates vary, although the majority of them have at least slight variations in personally identifiable information (PII), like name

⁶⁰We analyzed a snapshot of ACP enrollment data as of April 1, 2022. The enrollment data contain information on approximately 11.2 million households enrolled in ACP as of that date.

⁶¹We plan to share the results of our data analytics with FCC for additional review and action, as appropriate.

or date of birth (similar to prior Lifeline program violations).⁶² The remaining potential duplicates appear to have identical PII. We analyzed ACP reimbursements for a non-generalizable sample of 60 pairs of these potentially duplicative subscribers. We identified that providers received simultaneous reimbursements for 26 of 45 pairs of potential duplicates with variation among PII, and 0 of 15 pairs of potential duplicates with identical PII.⁶³ Figure 7 illustrates an anonymized example of potentially duplicative subscribers for which participating providers received simultaneous reimbursements.

⁶²For this analysis, we reviewed first name, middle name, last name, date of birth, phone number, the last four digits of the Social Security number, and primary address fields (street address, city, state, and ZIP code). Some subscribers are eligible for ACP through a benefit-qualifying person, who is another household member, such as a child or dependent. We did not review personal information in the fields related to the benefit-qualifying person. In September 2022, the FCC Office of the Inspector General reported on several instances in which multiple subscribers used the same child's personal information to enroll in ACP. According to FCC, the agency is taking steps to address issues related to the benefit-qualifying person.

⁶³Potentially ineligible households for which providers did not submit reimbursement claims still represent a risk of potential fraud. All households in a snapshot of ACP enrollment data may be claimed for reimbursement, though providers should only claim households if they received and used service during the relevant month. Providers have up to 6 months from the snapshot date to submit claims or upward revisions on prior claims. Additionally, we identified 10 pairs of potential duplicates with varied PII and seven pairs of potential duplicates with identical PII that had claims activity on both potential duplicate subscribers but in different months. Claims history in both potential duplicate subscribers presents a fraud risk, even if the claims for those potential duplicates do not overlap.

Figure 7: Example of Anonymized Potential Duplicate Subscribers and Their Related Claims in FCC’s Affordable Connectivity Program

Enrollment data:

Case	Last name	First name	Middle name	Phone number	Date of birth	Benefit-qualifying person	Address	Enrollment source
1	Smith	John Joseph	None	123-456-7890	10/1/1989	Child 1	123 Main Street	National verifier application
2	Smith	John	None	123-456-8146	10/1/1989	Child 2	234 First Avenue	National verifier application
3	Smoth	John	Joseph	123-785-4615	10/1/1989	Child 1	234 First Avenue Apt 3	National verifier application

Anonymized example shows three subscribers that appear to be duplicates of one household

Slight modifications in the personally identifiable information to appear as distinct households

Claims data:

Case	Service initiation date	Provider	Reimbursement claims ^a							Device
			Broadband service							
			Dec 2021	Jan 2022	Feb 2022	Mar 2022	Apr 2022	May 2022	Jun 2022	
1	12/1/2021	Company 1	✓	✓	✓	✓	✓	✓	⊖	✓
2	12/1/2021	Company 1	✓	✓	✓	✓	✓	✓	⊖	✓
3	2/19/2022	Company 2	⊖	⊖	⊖	✓	✓	⊖	⊖	⊖

✓ Provider received reimbursements

⊖ Provider did not receive reimbursements

One provider received reimbursements for broadband service for two instances of this potentially duplicate household for six months

A second provider received reimbursement for broadband service for two months, concurrently with cases 1 and 2

One provider received two reimbursements for devices for instances of this potentially duplicate household

Source: GAO analysis of Federal Communications Commission (FCC) data. | GAO-23-105399

^aInternet service providers are allowed 6 months to submit and revise reimbursement claims in the program, so claims for May and June 2022 may be submitted after we pulled claims data for this example.

Identity Verification

Verification of identity depends on how an applicant applies for ACP. For applicants applying through the Verifier, FCC uses a third-party vendor to verify the applicant’s identity by using personal information, like name and date of birth, entered on the application.⁶⁴ According to agency officials, applicants who do not apply through the Verifier are not subject to this identity verification, although participating providers who use their alternative verification processes to determine eligibility and enroll

⁶⁴According to USAC officials, the third-party vendor uses last name, date of birth, and the last four digits of an applicant’s Social Security number to verify identity. If applicants do not provide the last four digits of their Social Security number, they are required to submit additional documentation, such as a driver’s license or passport. However, according to USAC officials, the third-party vendor can verify identity in most cases, regardless of whether the applicant provides the last four digits of the Social Security number.

subscribers directly are expected to use verification processes at least as stringent as the Verifier.

Our analysis of ACP enrollment data identified subscribers with questionably old and young dates of birth. Specifically, we identified over 200 subscribers whose dates of birth were over 110 years old and 109 subscribers whose dates of birth were over 120 years old. The majority of these subscribers were enrolled through providers' alternative verification processes, which bypass FCC's third-party identification process described above. Conversely, we identified 20 subscribers whose dates of birth were under 10 years old and 12 subscribers whose dates of birth were under 5 years old.⁶⁵ All of these subscribers were enrolled through the Verifier and should have been verified by FCC's third-party identity verification process.

We also identified ACP subscribers who provided partial Social Security numbers that do not match records from the Social Security Administration. As mentioned earlier, a vendor validates the identities of applicants who submit information through the Verifier using name, date of birth, and if provided, the last four digits of the applicant's Social Security number. Based on our analysis, we found that over 874,000 (over 10 percent) of the approximately 8.5 million ACP subscribers who included the last four digits of their Social Security number did not match records in the Social Security Administration's Enumeration Verification System. These mismatches may be due to inaccurate identifying information and could be caused by non-fraudulent issues, like data entry errors. Nonetheless, these mismatches represent a fraud risk that monitoring processes may flag for further review.

Address Validation

Validation of an applicant's address depends on how the individual applies for ACP. For applicants applying through the Verifier, FCC uses U.S. Postal Service data to validate addresses prior to enrollment.⁶⁶ According to agency officials, applicants who do not apply through the Verifier are not subject to this address validation, although participating providers who use an alternative verification process are expected to use verification processes at least as stringent as the Verifier. Our analysis of

⁶⁵This includes two subscribers whose dates of birth were less than a month before their broadband service began.

⁶⁶If the address cannot be validated through this system, applicants may be able to electronically drop a pin on a map and submit documentation (such as a utility bill or mortgage or lease statement) to verify their address.

ACP enrollment data against U.S. Postal Service data identified addresses flagged as: (1) PO Boxes or commercial mailboxes, (2) having missing or invalid secondary information, and (3) unique ZIP codes that may warrant additional attention.⁶⁷ Although not all cases may be indicative of potential fraud, they represent issues that monitoring processes should flag for further review.

- **PO Boxes and commercial mailboxes.**⁶⁸ The ACP application explains that the primary address should be where the subscriber receives broadband service and instructs applicants to not provide a PO Box as a primary address. PO Box and commercial mailbox addresses raise questions about where the service is being provided—particularly for wired service—and can hinder efforts to enforce ACP’s one-per-household rule. Our analysis of ACP enrollment data flagged over 4,200 primary addresses as PO Boxes and over 6,600 primary addresses as commercial mailboxes.⁶⁹ Further, our analysis flagged 85 of these PO Box addresses and 126 of these commercial mailbox addresses that reportedly received wired service at those locations. Furthermore, in reviewing selected addresses to visit, we identified one PO Box and one commercial mailbox at locations that have closed or been demolished, with service initiation dates that appear to be after the locations were closed or demolished. Finally, we identified subscribers using commercial mailboxes as primary addresses and participating provider retail locations as mailing addresses. This type of arrangement could misdirect efforts to contact the household or mask a fictitious enrollment. We identified 10 different provider retail locations in our review of commercial mailbox addresses. Across the enrollment data, we identified over 275 households with one of these provider retail locations as either a primary or mailing address.⁷⁰ Figure 8 shows examples of these issues.

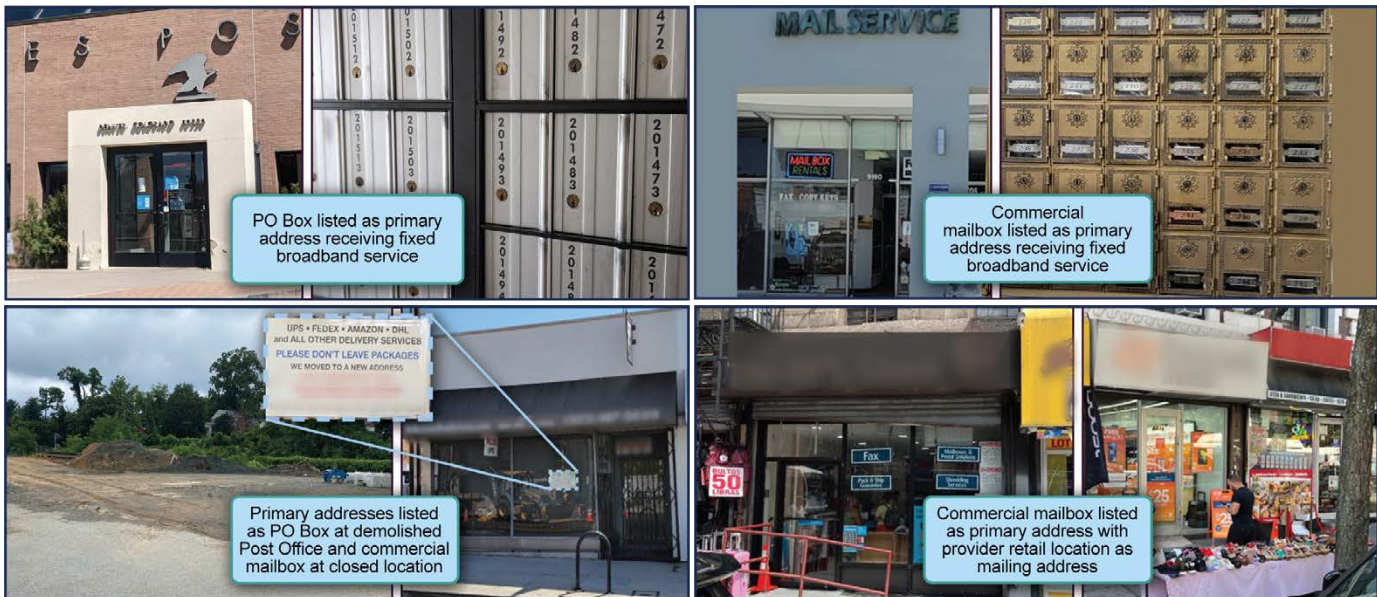
⁶⁷We also identified addresses that did not match U.S. Postal Service records and addresses flagged as vacant.

⁶⁸According to U.S. Postal Service guidance, a Commercial Mail Receiving Agency receives and handles mail for a client. An example of this type of entity is a United Parcel Service store. For purposes of this report, we refer to Commercial Mail Receiving Agencies as commercial mailboxes.

⁶⁹An address flagged as a commercial mailbox may not be inherently indicative of potential fraud. For example, a homeless shelter may be designated as a commercial mailbox if it collects and distributes mail.

⁷⁰We did not conduct a comprehensive review of ACP enrollment data to identify provider retail location addresses.

Figure 8: Examples of Issues Related to PO Box and Commercial Mailbox Addresses in Affordable Connectivity Program Enrollment Data



Source: GAO. | GAO-23-105399

- Missing or invalid secondary address information.** Secondary address information includes elements like apartment or floor number. This information is important for FCC to identify potentially duplicative subscribers and enforce the one-per-household rule. Our analysis identified over 289,000 subscriber addresses flagged as missing expected secondary address information. Additionally, we identified over 514,000 subscriber addresses flagged when dropping the secondary information entered (i.e., primary addresses were valid, but secondary address information was invalid).⁷¹
- Unique ZIP codes.** According to the U.S. Postal Service, unique ZIP codes are assigned to companies, government agencies, or other entities with sufficient mail volume. Our analysis flagged over 700 ACP subscriber addresses with unique ZIP codes. Use of a unique ZIP code is not inherently indicative of potential fraud. For example, college campuses may have unique ZIP codes, and Pell grant recipients are eligible for ACP. However, some of the unique ZIP

⁷¹Invalid secondary address information may not be inherently indicative of potential fraud. For example, subscribers listing the address of a homeless shelter or health care facility like a nursing home may include information beyond U.S. Postal Service address records.

codes flagged in our analysis raise questions about the corresponding subscribers. For example, we identified subscribers with unique ZIP codes related to prisons, commercial sites like banks, and Business Reply Mail services.⁷²

FCC did not consider these types of issues related to significant antifraud controls as part of its fraud risk assessment because it has not established monitoring processes for these controls (specifically, duplicate subscriber prevention, identity verification, and address validation). As noted above, the Fraud Risk Framework calls for managers to monitor and evaluate the effectiveness of antifraud activities, including fraud risk assessment and antifraud controls. Additionally, another leading practice in the Fraud Risk Framework is to use the results of monitoring and evaluations to improve the design and implementation of fraud risk management activities. For example, monitoring processes can produce useful information to support efforts to consider how existing controls mitigate fraud risks as part of a fraud risk assessment.

According to FCC officials, FCC has not established monitoring processes because most of the controls identified above are automated. They explained that some manual controls are monitored. For example, manual review of ACP applications includes a quality assurance review to ensure that eligibility decisions were made appropriately. Additionally, FCC officials noted that USAC's program integrity reviews may capture quality assurance information for specific controls, although these reviews are not specifically designed for this purpose. These efforts can result in useful information for monitoring certain controls, but they do not enable FCC to comprehensively monitor its antifraud controls.

Without sufficient monitoring of its antifraud controls, including automated controls, FCC lacks assurance that its antifraud efforts are effectively preventing, detecting, and responding to fraud, and safeguarding program funds. Further, such monitoring processes can produce information to more effectively assess inherent fraud risks and consider the effect of antifraud controls in reducing those risks.

Conclusions

ACP represents a significant investment in closing the digital divide, and FCC has made significant progress in quickly implementing the program under the timelines required by the IIJA. FCC's efforts to establish

⁷²Business Reply Mail is a service that enables a sender to provide a recipient with a prepaid method for replying to a mailing and is frequently used by direct marketers, researchers, publishers, and other businesses.

program performance goals and measures, dedicate funds to outreach and translate its outreach materials into non-English languages, and conduct a program fraud risk assessment demonstrate its commitment to the program's success. As FCC continues to implement and mature the program, including refining its goals and measures, translation process and outreach planning, and fraud risk management activities, it could strengthen the program's effectiveness—and its ability to clearly demonstrate program accomplishments—by better aligning these efforts with leading practices. For example, by aligning its goals and measures with key attributes of effective goals and measures, revising the language translation process, and developing a plan to guide consumer outreach activities, FCC will be better positioned to ensure the program's success. Similarly, by developing and implementing an antifraud strategy and monitoring antifraud controls (and then using information from monitoring to regularly assess fraud risks and evaluate fraud risk management activities), FCC will be better positioned to manage fraud risks to the program and, ultimately, ensure the best use of the program's funds.

Recommendations for Executive Action

We are making the following nine recommendations to FCC:

The Chair of FCC should ensure that ACP performance goals and measures align with key attributes of effective performance goals and measures. (Recommendation 1)

The Chair of FCC should revise the language translation process (for both "in-house" and contracted translations, as appropriate) for developing ACP non-English outreach materials to include the following steps: (1) develop a plan for designing and producing translated products; (2) incorporate review and quality assurance steps into the translation process and document completion of these steps during each process; (3) develop and test the products with others who represent the intended audience; and (4) update and finalize the products based on development and testing results. (Recommendation 2)

The Chair of FCC should develop a consumer outreach plan, which aligns with leading practices for consumer outreach planning, to educate eligible consumers about ACP. (Recommendation 3)

The Office of the Managing Director should develop and implement a process, with clearly defined responsibilities and sources of information on fraud risks, for conducting fraud risk assessments for ACP at regular intervals and when there are changes to the program or operating environment. (Recommendation 4)

The Office of the Managing Director should develop and implement an antifraud strategy for ACP that aligns with leading practices in the Fraud Risk Framework. These practices include documenting and communicating the program's activities for preventing, detecting, and responding to fraud and establishing roles and responsibilities of those involved in fraud risk management activities. (Recommendation 5)

The Office of the Managing Director should develop and implement processes to monitor antifraud controls related to preventing duplicate subscribers in ACP. (Recommendation 6)

The Office of the Managing Director should develop and implement processes to monitor antifraud controls related to subscriber identity verification in ACP. (Recommendation 7)

The Office of the Managing Director should develop and implement processes to monitor antifraud controls related to subscriber address validation in ACP. (Recommendation 8)

The Office of the Managing Director should use information obtained from monitoring processes to improve the design and implementation of fraud risk management activities in ACP, including its fraud risk assessment and subsequent antifraud strategy. (Recommendation 9)

Agency Comments and Our Evaluation

We provided a draft of this report to FCC for review and comment.

In its comments, reproduced in appendix IV, FCC agreed with our recommendations and described its plans to address each one. For example, regarding our recommendation to ensure that ACP performance goals and measures align with key attributes of effective performance goals and measures, FCC described actions to collect information and establish targets. Regarding our recommendation to revise the language translation process for ACP outreach materials, FCC described actions it is taking or plans to take in line with the steps detailed in the recommendation, such as developing a quality control process for internal translations. Similarly, regarding our recommendation to develop a consumer outreach plan, FCC described its ongoing and planned actions, such as developing a national strategy to promote ACP. Finally, regarding our recommendations related to various processes for managing fraud risks, FCC also described various implementation steps, such as updating its policies and procedures and working with a contractor to develop an antifraud strategy.

Although FCC agreed with our recommendation related to ACP performance goals and measures, it disagreed with two aspects of the related analysis.

- First, regarding the measure on overall consumer burden and FCC's monthly-dollar-figure metric, FCC disagreed that using the monthly dollar figure to measure overall consumer burden will be distorted by increased participation. The ACP final rules establish that FCC will calculate this metric by dividing the annual expenditures of the program by the number of households in the U.S., with the total being a monthly dollar amount. However, in its comments on the draft report, FCC appears to describe a different calculation related to the program's administrative costs per subscriber. Our report notes that FCC's goals and measures lack clarity and this example (i.e., the difference between what is described in the final rules versus in FCC's comments) further illustrates that FCC's goals and measures could be strengthened by additional clarity.
- Second, FCC disagreed that its goals do not meet the crosscutting criteria. FCC notes, for example, areas where performance information it captures for ACP could also be relevant for Lifeline. We agree that performance information for ACP could also be relevant for Lifeline, given that ACP and Lifeline share similarities. However, as stated in our report, the lack of specificity regarding what targets FCC is measuring means it is unclear how FCC will gauge the performance of ACP and Lifeline relative to each other. In its comments on the draft report, FCC describes actions it will take to implement our recommendation, including actions that will help to clarify what, specifically, it is measuring and what the targets are. These actions could, in turn, aid in making it clearer how exactly FCC is gauging ACP and Lifeline relative to each other and permit FCC to compare results.

We also provided relevant report excerpts related to the Enumeration Verification System to the Social Security Administration for technical comment. The Social Security Administration provided technical comments, which we incorporated as appropriate.

As agreed with your offices, unless you publicly announce the contents of this report earlier, we plan no further distribution until 7 days from the report date. At that time, we will send copies to the appropriate congressional committees, the Chairwoman of FCC, and other interested parties. In addition, the report will be available at no charge on the GAO website at <https://www.gao.gov>.

If you or your staff have any questions about this report, please contact me at (202) 512-2834 or vonaha@gao.gov. Contact points for our Offices of Congressional Relations and Public Affairs may be found on the last page of this report. GAO staff who made key contributions to this report are listed in appendix V.

A handwritten signature in black ink, appearing to read 'Andrew Von Ah', written in a cursive style.

Andrew Von Ah
Director, Physical Infrastructure

Appendix I: Objectives, Scope, and Methodology

This report examines the extent to which the Federal Communications Commission's (FCC) Affordable Connectivity Program (ACP) efforts align with relevant selected leading practices in: (1) establishing performance goals and measures; (2) conducting outreach; and (3) managing fraud risks.

To assess FCC's ACP performance goals and measures, we reviewed documentation and interviewed officials from FCC and the Universal Service Administrative Company (USAC), the not-for-profit entity that administers various programs on behalf of FCC. For example, we reviewed public notices, orders, and other records in FCC's proceedings for ACP and ACP's predecessor, the Emergency Broadband Benefit program (EBB).¹ We also reviewed relevant planning documentation, such as FCC's Strategic Plan and Equity Action Plan,² and the laws establishing EBB and ACP—the Consolidated Appropriations Act, 2021 and the Infrastructure Investment and Jobs Act (IIJA).³ Due to the similarities between ACP and FCC's other broadband affordability program, Lifeline, we also reviewed the orders establishing Lifeline's performance goals and measures and modernizing the Lifeline program, as well as our prior work on Lifeline.⁴

For additional context on household participation in ACP, we also analyzed FCC enrollment data for ACP, EBB, and Lifeline. We analyzed Lifeline data due to similarities between ACP and Lifeline and because Lifeline is FCC's other broadband affordability program. We analyzed enrollment data from May 2021 to September 2022, which represents the beginning of EBB to the end of the third quarter following the launch of

¹*In the Matter of Affordable Connectivity Program*, FCC WC Dkt. No. 21-450; *In the Matter of Emergency Broadband Benefit Program*, FCC WC Dkt. No. 20-445.

²FCC, *Strategic Plan: Fiscal Years 2022-2026* (Washington, D.C.: Mar. 29, 2022); and *Equity Action Plan Pursuant to the President's Executive Order On Advancing Racial Equity and Support for Underserved Communities Through the Federal Government* (Washington, D.C.: Apr. 14, 2022).

³Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, div. N, tit. IX, § 904, 134 Stat. 1182, 2129-36; IIJA, Pub. L. No. 117-58, 135 Stat. 429, 1238. The program is now codified at 47 U.S.C. § 1752.

⁴*In the Matter of Lifeline and Link Up Reform and Modernization*, Report and Order and Further Notice of Proposed Rulemaking, 27 FCC Rcd 6656 (8) (2012); *In the Matter of Lifeline and Link Up Reform and Modernization*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962 (5) (2016); and see, for example, GAO, *Telecommunications: FCC Should Evaluate the Efficiency and Effectiveness of the Lifeline Program*, [GAO-15-335](#) (Washington, D.C.: Mar. 24, 2015).

ACP. We analyzed various characteristics from these data, including the method used to verify the subscriber's program eligibility and geographic indicators (such as subscribers' state and whether they live on program-qualifying tribal lands).

To estimate the number of ACP-eligible households, we used relevant U.S. Census Bureau American Community Survey and Puerto Rico Community Survey data from 2019, the most current available at the time of our analysis (excluding 2020 survey data, which the U.S. Census Bureau has deemed experimental due to the impacts of the COVID-19 pandemic). Specifically, we analyzed data elements that provide information about household income and the use of certain government assistance programs to create a minimum estimate of the eligible population nationally and in each state. We identified households as eligible if their previous year's total income was less than or equal to 135 percent of the federal poverty thresholds⁵ or if any household member in the past 12 months participated in the Supplemental Nutrition Assistance Program, received income from various public assistance programs targeting low-income households, received supplemental security income, or—at the time of the surveys' data collection—was covered by Medicaid (or any other government-assisted health insurance program for those with low incomes or a disability).⁶ We assessed the reliability of these data by reviewing relevant system documentation, interviewing agency officials, or conducting electronic testing, where possible. We determined that the data elements we used from these data sets were sufficiently reliable for the purposes of our reporting objective.

We assessed FCC's efforts to establish goals and measures against applicable leading practices for effective performance management that we identified from our prior reports, particularly our Government Performance and Results Act assessment and evaluation guides and key

⁵We used the 135 percent threshold because ACP's predecessor, EBB, required household income to be 135 percent or less of the federal poverty level to qualify for the program based on income.

⁶Additional qualifying eligibility criteria, such as receiving a Pell grant; participation in the Special Supplemental Nutrition Program for Women, Infants, and Children; or participation in other qualifying programs cannot be identified in the American Community Survey data. As the estimate for eligibility is based on household incomes less than or equal to 135 percent of the federal poverty level (as opposed to 200 percent under ACP) and we are not able to capture all qualifying eligibility criteria, the estimate for eligibility represents a minimum.

attributes of successful performance measures.⁷ The Government Performance and Results Act, as enhanced by the Government Performance and Results Act Modernization Act, establishes the importance of agencies using performance goals and measures as a way to improve the management of federal programs by focusing on the results of programs.⁸ While the Acts' requirements apply at the departmental level, we have previously stated that they can serve as leading practices at the program level.⁹ The leading practices we identified included 11 attributes of effective performance goals and measures, and we assessed FCC's efforts against all 11 attributes. One analyst assessed the relevant information about each goal and measure against each of these attributes, and other reviewers reviewed this assessment. Based on these assessments, we determined whether the goal or measure either aligned with the elements that an attribute entailed or did not fully align with the elements that an attribute entailed.

To assess how FCC conducted outreach to raise awareness for ACP, we reviewed documentation and interviewed officials from FCC and USAC. For example, we reviewed FCC documentation related to the number and types of outreach events completed between November 2021 and September 2022. We also reviewed ACP outreach materials. These materials included the program's main webpage and the consumer frequently-asked-questions webpage, as well as items from the program's outreach toolkit, such as flyers, one-pagers, and public service announcement scripts. In addition, we interviewed FCC and USAC officials to obtain greater context on the agency's outreach efforts.

⁷GAO, *Agencies' Annual Performance Plans Under the Results Act: An Assessment Guide to Facilitate Congressional Decisionmaking*, [GAO/GGD/AIMD-10.1.18](#) (Washington, D.C.: February 1998); *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, [GAO/GGD-10.1.20](#) (Washington, D.C.: April 1998); and *Tax Administration: IRS Needs to Further Refine Its Tax Filing Season Performance Measures*, [GAO-03-143](#) (Washington, D.C.: Nov. 22, 2002). These reports establish guides for assessing and evaluating agency performance plans and attributes of effective performance goals and measures, and we have reiterated these practices in our reporting on agencies' efforts to manage for results. See <https://www.gao.gov/leading-practices-managing-results-government>.

⁸Pub. L. No. 103-62, 107 Stat. 285 (1993), as enhanced by Pub. L. No. 111-352, § 3, 124 Stat. 3866, 3867 (2011) codified at 31 U.S.C. § 1115(b)(2), (6).

⁹See, for example, GAO, *Telecommunications: FCC Should Enhance Performance Goals and Measures for Its Program to Support Broadband Service in High-Cost Areas*, [GAO-21-24](#) (Washington, D.C.: Oct. 1, 2020).

To obtain additional context on how participating providers advertised ACP on their websites, we used two selection processes to identify a total of 20 provider websites to review.¹⁰ First, we used FCC data from November 2021 (the most readily available at the time of our selection) to identify the 10 largest participating providers as measured by subscriber enrollment in EBB. Although the data did not account for providers that joined the program after the launch of ACP, we still found the data to be appropriate given that the 10 largest participating providers at this time accounted for nearly 80 percent of program subscribers.

We used a combination of random sampling and judgmental selection to identify 10 additional providers, so we could review websites from providers that may be smaller than the ones identified in our initial selection. We randomized FCC’s list of participating providers and identified the first 10 providers on the randomized list as our sample. If the providers listed in this sample had similar characteristics—such as all of them offering the same type of broadband service or not offering a device discount—we considered the next provider listed (number 11) to substitute into the sample. We repeated this process until we achieved a variety of these characteristics in the sample. These two selection processes allowed us to identify a variety of provider websites that, while non-generalizable, provided useful insights on how some participating providers are advertising the program; the 20 providers we identified are listed in the table below.

Table 6: List of Participating Providers Selected for Website Review

Providers identified based on number of subscribers	Providers identified using randomized judgmental selection
Assurance Wireless	Arctic Slope Telephone Association Cooperative, Inc.
AT&T	Arrowhead Communications Corporation
Charter Communications (doing business as Spectrum)	Catnect Communications, Inc.
Comcast Cable Communications	Cellspan Inc.
Dish Wireless LLC	Commnet Four Corners, LLC
Excess Telecom Inc.	Franklin Telephone Co., Inc.
Global Connection Inc. of America	Gen Mobile, Inc.

¹⁰At the time of our selection, the program had approximately 1,300 participating providers.

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Providers identified based on number of subscribers	Providers identified using randomized judgmental selection
Q Link Wireless LLC	North Central Telephone Cooperative
Sage Telecom Communications, LLC (doing business as TruConnect)	Sano Health, LLC
Tracfone Wireless Inc.	The Preston Telephone Company

Source: GAO. | GAO-23-105399

We identified program information related to household eligibility and similar information that would help consumers understand ACP. For each provider website, two analysts reviewed each website for this program information to determine if it was present on the website and reconciled any differences in findings. Based on this analysis, we were able to obtain greater context on how these providers advertised the program online and the level of information that these websites provided to the consumer.

We also reviewed a selection of FCC’s non-English ACP outreach materials. To determine which non-English languages to review, we analyzed 2019 American Community Survey data (the most current available at the time of our selection) and found that Spanish, Chinese, Vietnamese, Korean, and French (including Haitian or Cajun) accounted for the highest number of limited-English-speaking households in the United States.¹¹ FCC has translated ACP outreach materials into these languages, with the exception of Cajun. We then identified analysts across our agency who spoke these languages to assist in our review of the non-English materials.¹²

We selected materials for review based on (1) the availability of the material in non-English languages; (2) the means by which the material is consumed (i.e., online, such as a webpage, or in print, such as a flyer); and (3) the type of information on the material. (See table 7.) For example, we reviewed the ACP main webpage and Consumer FAQ webpage because they were available for online audiences and, in some cases, these materials conveyed information excluded from the print materials. We did not review certain flyers from the outreach toolkit because they contained similar information to other toolkit items we reviewed. We also reviewed additional materials that were only available in Spanish; we reviewed the Spanish audio public service announcement script, newsletter blurb, and select social media images, as they are

¹¹U.S. Census Bureau, *American Community Survey 1-Year Estimates Detailed Tables*, B16002 (Washington, D.C.: 2019).

¹²We were unable to identify analysts who spoke Haitian, so we only reviewed materials translated into French.

consumed differently than other materials included in our review. We reviewed these materials in March 2022.

Table 7: Federal Communications Commission’s (FCC) Non-English Affordable Connectivity Program (ACP) Outreach Materials Reviewed

Source	Material	Non-English language selected for review
FCC website	ACP main webpage	Traditional Chinese, Korean, Spanish, Vietnamese
	Consumer FAQ webpage	Traditional Chinese, Korean, Spanish, Vietnamese
Outreach toolkit	Fact sheet	Simplified Chinese, French, Korean, Spanish, Vietnamese
	Consumer handout (9"x5")	Simplified Chinese, French, Korean, Spanish, Vietnamese
	Consumer handout (4"x4")	Simplified Chinese, French, Korean, Spanish, Vietnamese
	Public service announcement script	Spanish
	Newsletter blurb	Spanish
	Social media images	Spanish

Source: GAO. | GAO-23-105399

We assessed the non-English ACP outreach materials we reviewed against applicable leading practices for consumer-oriented content. We identified relevant leading practices for consumer-oriented content from various federal sources that we have previously used in prior work.¹³ We then identified four key attributes—clarity and accuracy, completeness, practicality, and, for online content, managing users’ expectations—from these leading practices that were relevant to our work. We used these attributes to gauge each materials’ alignment with the practices. To review the materials, analysts worked in pairs; each pair spoke one of the five non-English languages reviewed. For each non-English language, one analyst completed an initial review of each material, followed by a second analyst performing an additional review. If the two analysts disagreed, they discussed and reached a consensus on how well the material aligned. We scored each material as “Met,” as in the material met that attribute; “Partially met,” as in the material met some, but not all elements of the attribute; and “Did not meet,” as in the material did not meet any elements of the attribute.

¹³U.S. Digital Service, *Digital Services Playbook*, accessed Dec. 10, 2021, <https://playbook.cio.gov/>; U.S. Web Design System, *Design Principles*, accessed Dec. 10, 2021, <https://designsystem.digital.gov/design-principles/>; and General Service Administration, *Top 10 Best Practices for Multilingual Websites*, accessed Dec. 10, 2021, <https://digital.gov/resources/top-10-best-practices-for-multilingual-websites/>.

We also assessed FCC's language translation process for ACP outreach materials against recommended practices from U.S. Census Bureau guidance for developing public-facing translated products.¹⁴ We reviewed this guidance and identified four broad recommended practices that reflect the 2020 Census translation workflow phases and that encompass language translation efforts from planning to completion. According to FCC officials, they also considered U.S. Census Bureau best practices for the language translation process for ACP outreach materials. One analyst assessed FCC's translation process against each of the identified practices and other reviewers reviewed this assessment. Based on these assessments we determined whether the process aligned, partially aligned, or did not align with the elements the practice entailed.

Finally, we reviewed FCC's outreach plan for EBB, ACP's predecessor, and assessed it against the nine leading practices for consumer education planning identified in our previous work.¹⁵ One analyst assessed the plan against each of the practices and other reviewers reviewed this assessment. Based on these assessments, we determined whether the plan met, partially met, or did not meet the elements the practice entailed.

To obtain additional context on FCC's ACP goals, measures, and outreach, we sought additional perspectives from relevant stakeholders. We reviewed a selection of stakeholder comments filed in the record for FCC's ACP proceeding to identify comments related to key performance goals and measures and outreach themes. We limited our review of stakeholder comments to exclude certain categories of filings that are often duplicative (such as filings that disclose and summarize meetings a stakeholder held with FCC staff). We also selected 27 stakeholders—specifically, 8 industry associations; 5 state, local, and tribal entities; and 14 advocacy groups—to interview. To select knowledgeable stakeholders that represent a variety of viewpoints from a cross-section of interests, we considered various factors including the alignment of the stakeholders'

¹⁴U.S. Census Bureau, *Developing Public-Facing Language Products: Guidance From the 2020 Census Language Program* (Washington, D.C.: Nov. 3, 2021). According to this guidance, the bureau developed this product to share detailed information on how the agency successfully developed and executed the 2020 Census language program, which translated over 7 million words for more than 2,500 projects.

¹⁵GAO, *Digital Television Transition: Increased Federal Planning and Risk Management Could Further Facilitate the DTV Transition*, [GAO-08-43](#) (Washington, D.C.: Nov. 19, 2007).

missions or activities with the issues under our review, their engagement in the proceeding, and how broad their representations are. Table 8 lists these stakeholders. Because stakeholders vary in their expertise with various topics, not every stakeholder provided an opinion on every topic. Accordingly, their views are not generalizable to those of all stakeholders, though they provided us with a variety of perspectives.¹⁶ Additionally, not all selected stakeholders accepted our requests for interviews or were responsive to our requests.

Table 8: List of Stakeholders Interviewed

Industry associations
ACA Connects – America’s Communications Association
American Association of Service Coordinators
CTIA
National Lifeline Association
NCTA – The Internet & Television Association
USTelecom – The Broadband Association
Wireless Internet Service Providers Association
WTA – Advocates for Rural Broadband
State, local, and tribal entities
National Association of Regulatory Utility Commissioners
National Association of Telecommunications Officers and Advisors
National Congress of American Indians
National Tribal Telecommunications Association
Native American YesWeCan Foundation
Advocacy groups
AAPI Tech Table
AARP
Benton Institute for Broadband and Society
Common Cause
Consortium for Citizens with Disabilities’ Technology and Telecommunications Task Force
EducationSuperHighway
Free Press
Multicultural Media, Telecom, and Internet Council
National Coalition on Black Civic Participation, Black Women’s Roundtable

¹⁶Throughout this report, we refer to “some” stakeholders if representatives from 2–5 entities expressed the view (and “several” if 6–10, and “many” if 11 or more).

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National Consumer Law Center
National Hispanic Media Coalition
New America
Public Knowledge
United Church of Christ

Source: GAO. | GAO-23-105399

To assess FCC’s fraud risk management activities, we reviewed relevant documentation and interviewed FCC and USAC officials. For example, in addition to the documentation described above, we reviewed FCC’s fraud risk assessment for ACP, its Antifraud Directive,¹⁷ and relevant program policies and guidance. Because of similarities between ACP and Lifeline, we also reviewed FCC Office of Inspector General reports and our prior reports on Lifeline and documentation related to prior Lifeline program violations.¹⁸

We assessed FCC’s fraud risk management activities against selected leading practices in our Fraud Risk Framework.¹⁹ Initially, because the program is new, we selected leading practices from the Commit and Assess components of the framework to evaluate FCC’s efforts. However, because FCC conducted a fraud risk assessment for ACP during our audit work, we also selected certain practices from the Design and Implement component and the Evaluate and Adapt component of the framework. We selected these additional leading practices because they are important steps in addressing the fraud risks FCC identified and assessed. Table 9 shows the selected leading practices from the Fraud Risk Framework used in this review.

¹⁷FCC, *Policy for Detecting and Deterring Fraud and Promoting Ethical Conduct within the FCC*, FCCINST 1102.6 (Washington, D.C.: July 2020).

¹⁸See, for example, FCC Office of Inspector General, *Advisory Regarding Provider Efforts to Deceive Lifeline Consumers to Enroll for Unwanted Government-Subsidized ACP Services* (Mar. 11, 2022).

¹⁹GAO, *A Framework for Managing Fraud Risks in Federal Programs*, [GAO-15-593SP](#) (Washington, D.C.: July 2015).

Table 9: Selected Leading Practices for Fraud Risk Management

Component	Leading practice
Commit	<p>Designate an entity to design and oversee fraud risk management activities that</p> <ul style="list-style-type: none"> understands the program and its operations, as well as the fraud risks and controls throughout the program; has defined responsibilities and the necessary authority across the program; has a direct reporting line to senior-level managers within the agency; and is located within the agency and not the Office of Inspector General, so the latter can retain its independence to serve its oversight role.
Assess	<p>Plan to conduct fraud risk assessments at regular intervals and when there are changes to the program or operating environment, as assessing fraud risks is an iterative process.</p> <p>Identify specific tools, methods, and sources for gathering information about fraud risks, including data on fraud schemes and trends from monitoring and detection activities.</p> <p>Identify inherent fraud risks affecting the program.</p> <p>Assess the likelihood and impact of inherent fraud risks.</p> <ul style="list-style-type: none"> Involve qualified specialists, such as statisticians and subject-matter experts, to contribute expertise and guidance when employing techniques like analyzing statistically valid samples to estimate fraud losses and frequency. Consider the nonfinancial impact of fraud risks, including impact on reputation and compliance with laws, regulations, and standards. <p>Determine fraud risk tolerance.</p> <p>Examine the suitability of existing fraud controls and prioritize residual fraud risks.</p> <p>Document the program's fraud risk profile.</p>
Design and Implement	<p>Develop, document, and communicate an antifraud strategy to employees and stakeholders that describes the program's activities for preventing, detecting, and responding to fraud, as well as monitoring and evaluation.</p>
Evaluate and Adapt	<p>Monitor and evaluate the effectiveness of preventive activities, including fraud risk assessments and the antifraud strategy, as well as controls to detect fraud and response efforts.</p> <p>Use the results of monitoring and evaluations to improve the design and implementation of fraud risk management activities.</p>

Source: GAO. | GAO-23-105399

As part of this review, we analyzed a snapshot of ACP enrollment data as of April 1, 2022.²⁰ The enrollment data contain information on approximately 11.2 million subscribers enrolled in ACP as of that date, including name, address, date of birth, enrollment method, and broadband service type. Additionally, we matched relevant elements of the enrollment data against data in the U.S. Postal Service's Address Management System.²¹ For a non-generalizable sample of households,

²⁰We plan to share the results of our data analytics with FCC for additional review and action, as appropriate.

²¹The Address Matching System application program interface is a commercially available software package that standardizes addresses and provides specific flags, such as commercial mailboxes, vacant, or invalid addresses.

we conducted additional reviews of addresses flagged as PO Boxes, commercial mailboxes, and unique ZIP codes. In certain cases, we reviewed ACP reimbursement claims data to determine whether providers had received reimbursements for a non-generalizable sample of households. Although not representative of all cases, these non-generalizable samples provide important illustrations of potential issues with ACP subscribers.

We also compared ACP enrollee identity information to the Social Security Administration's Enumeration Verification System to identify enrollees whose identity information may not have been accurate. Specifically, we submitted enrollment information for individuals whose enrollment data included the last four digits of their Social Security number.²² If the name and date of birth information corresponded to at least one Social Security Administration record, we were able to then identify the full Social Security number(s) for that record. We then compared the partial Social Security numbers in the enrollment data to the full Social Security number.²³ This comparison helped to identify enrollees who have potentially invalid identity information in their enrollment record. We assessed the reliability of the data by reviewing relevant system documentation, interviewing agency officials, or conducting electronic testing, where possible. We determined that the data elements we used from these data sets were sufficiently reliable for the purposes of our reporting objective.

We conducted this performance audit from October 2021 to January 2023 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on our audit objectives. We believe that the evidence obtained provides a reasonable basis for our findings and conclusions based on our audit objectives.

²²As of April 1, 2022, the enrollment data contained partial Social Security numbers for approximately 8.5 million of the total 11.2 million ACP subscribers (76 percent).

²³We performed this analysis because, per Social Security Administration policy, to verify a Social Security number, the full number and name for the record are required. A partial number cannot be submitted through the Enumeration Verification System in order to obtain a verification. Matching on a partial number has a higher risk of error than matching a full number and may result in individuals incorrectly being identified as a match.

Appendix II: Analysis of ACP and EBB Enrollment Data

For additional context on the status of household participation in the Federal Communications Commission's (FCC) Affordable Connectivity Program (ACP), we analyzed enrollment data from May 2021 to September 2022. The Emergency Broadband Benefit program (EBB) began in May 2021,¹ and in response to the Infrastructure Investment and Jobs Act, ACP replaced EBB on December 31, 2021.² Due to the similarities between ACP and FCC's other broadband affordability program, Lifeline, we also analyzed EBB and ACP enrollment relative to Lifeline enrollment, for further context.

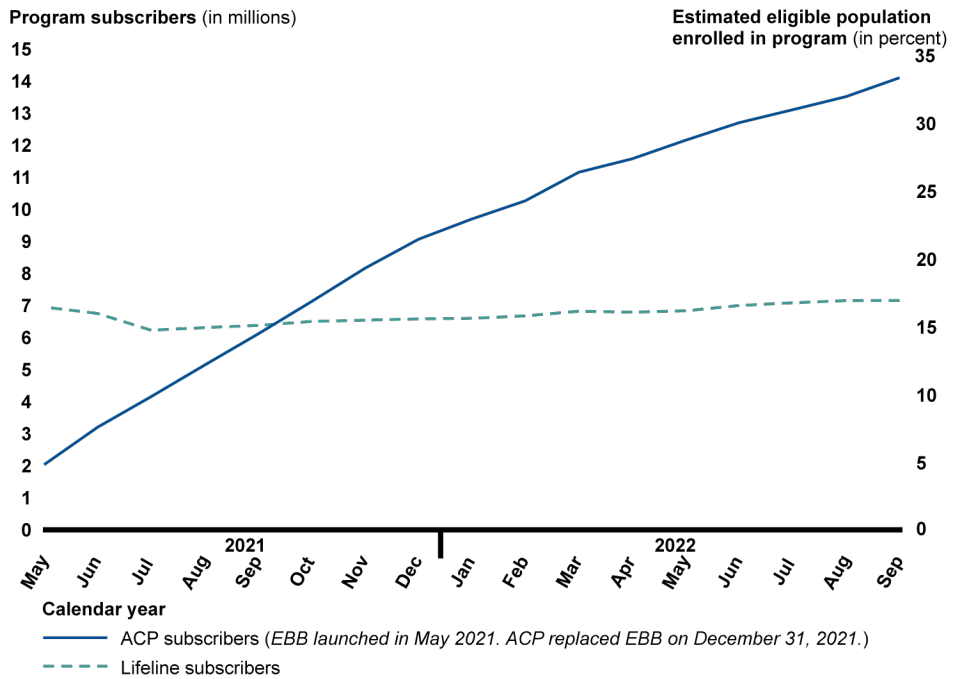
As shown in figure 9, about 14 million households were enrolled in ACP as of September 2022 (with enrollment overtaking Lifeline enrollment within EBB's first 6 months), which constituted about a third of the minimum estimated eligible population of about 42 million households.³

¹EBB was authorized by the Consolidated Appropriations Act, 2021. Pub. L. No. 116-260, div. N, tit. IX, § 904, 134 Stat. 1182, 2129-36.

²As such, May 2021 to September 2022 represents the beginning of EBB to the end of the third quarter following the launch of ACP. The Infrastructure Investment and Jobs Act (IIJA), Pub. L. No. 117-58, § 60502(a)(1)(A), (a)(2), 135 Stat. 429, 1238-39 (2020) (authorizing the Affordable Connectivity Program); div. J, tit. IV, 135 Stat at 1382 (providing additional funding). This program is now codified in 47 U.S.C. § 1752. See also *In the Matter of Affordable Connectivity Program, Emergency Broadband Benefit Program*, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-2 (2022).

³For more detail regarding estimating eligibility, see appendix I.

Figure 9: Enrollment in FCC’s Emergency Broadband Benefit Program (EBB), Affordable Connectivity Program (ACP), and Lifeline, May 2021–September 2022

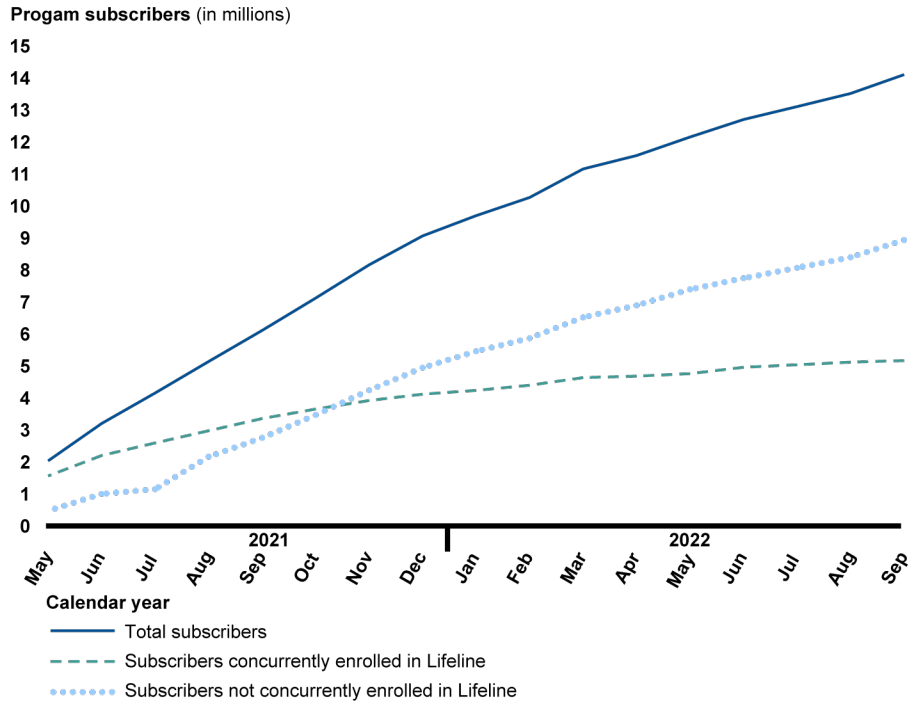


Source: GAO analysis of Federal Communications Commission (FCC) and U.S. Census Bureau data. | GAO-23-105399

Note: The eligible population is estimated using data from the 2019 American Community Survey and Puerto Rico Community Survey. Households were identified as eligible if their previous year’s total income was less than or equal to 135 percent of the federal poverty thresholds or if any household member in the past 12 months participated in the Supplemental Nutrition Assistance Program, received income from various public assistance programs targeting low-income households, received supplemental security income, or—at the time of the surveys’ data collection—was covered by Medicaid (or any other government-assisted health insurance program for those with low incomes or a disability). As additional qualifying eligibility criteria cannot be identified in the American Community Survey and Puerto Rico Community Survey data, the eligibility estimate is a minimum.

In EBB’s first 6 months, subscribers who were concurrently enrolled in Lifeline represented the majority of subscribers, but subscribers not concurrently enrolled in both programs grew to represent the majority of subscribers (specifically, representing about 63 percent of ACP subscribers as of September 2022). (See fig. 10.)

Figure 10: Enrollment in FCC’s Emergency Broadband Benefit Program (EBB) and Affordable Connectivity Program (ACP) by Lifeline Enrollment Status, May 2021–September 2022



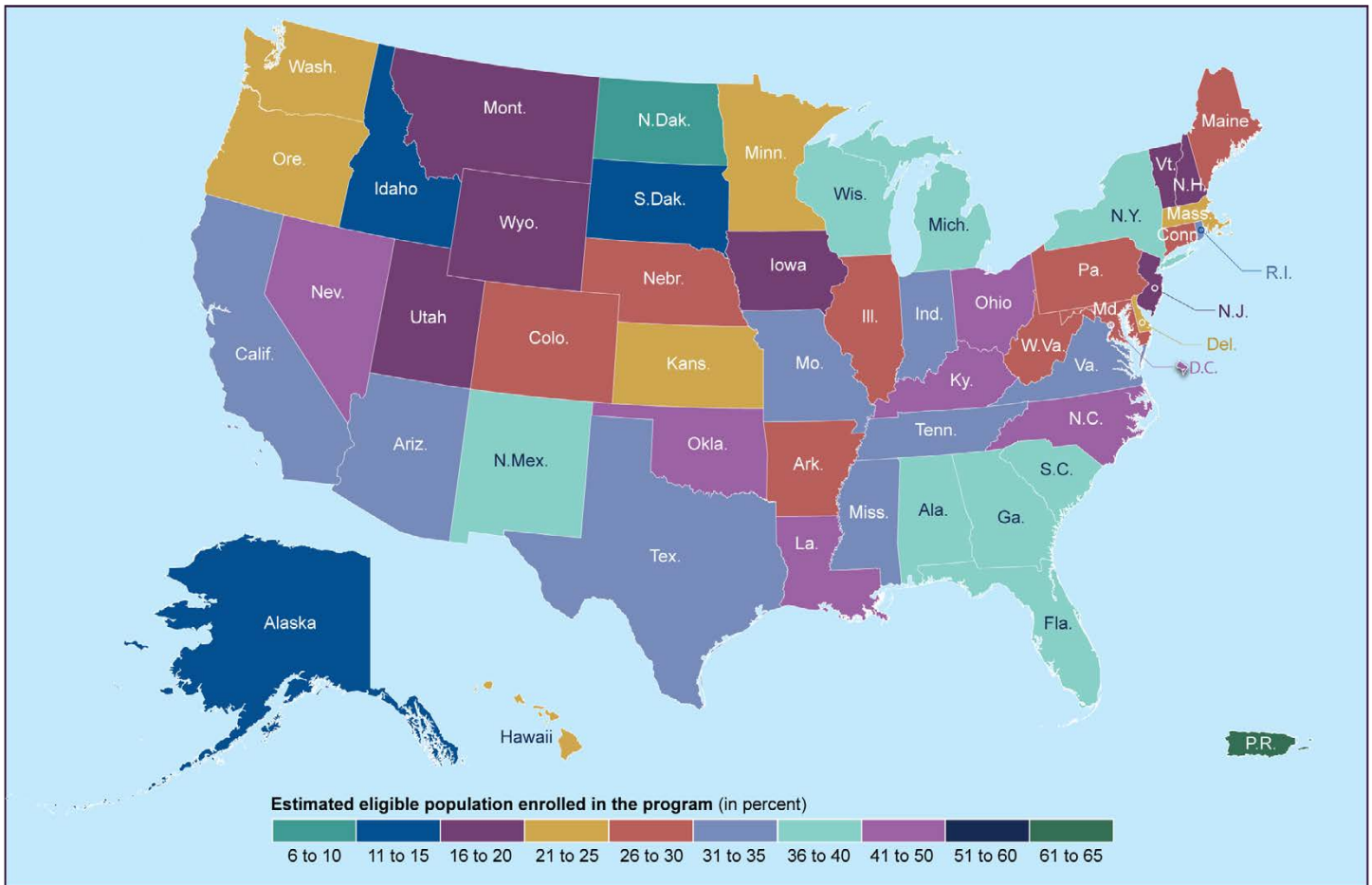
Source: GAO analysis of Federal Communications Commission (FCC) data. | GAO-23-105399

Note: EBB launched in May 2021. ACP replaced EBB on December 31, 2021.

ACP enrollment has varied throughout the country, with some states or territories having a higher percentage of their minimum estimated eligible population enrolled in the program than others. As shown in figure 11, as of September 2022, the percentage of the minimum estimated eligible population enrolled in the program across states and territories primarily fell in the 16 to 40 percent range. From May 2021 to September 2022, subscribers who live on qualifying tribal lands represented a small portion of total EBB and ACP subscribers (averaging under 2 percent).

Appendix II: Analysis of ACP and EBB Enrollment Data

Figure 11: Enrollment in FCC’s Affordable Connectivity Program (ACP) by State as of September 2022



Source: GAO analysis of Federal Communications Commission (FCC) and U.S. Census Bureau data. | GAO-23-105399

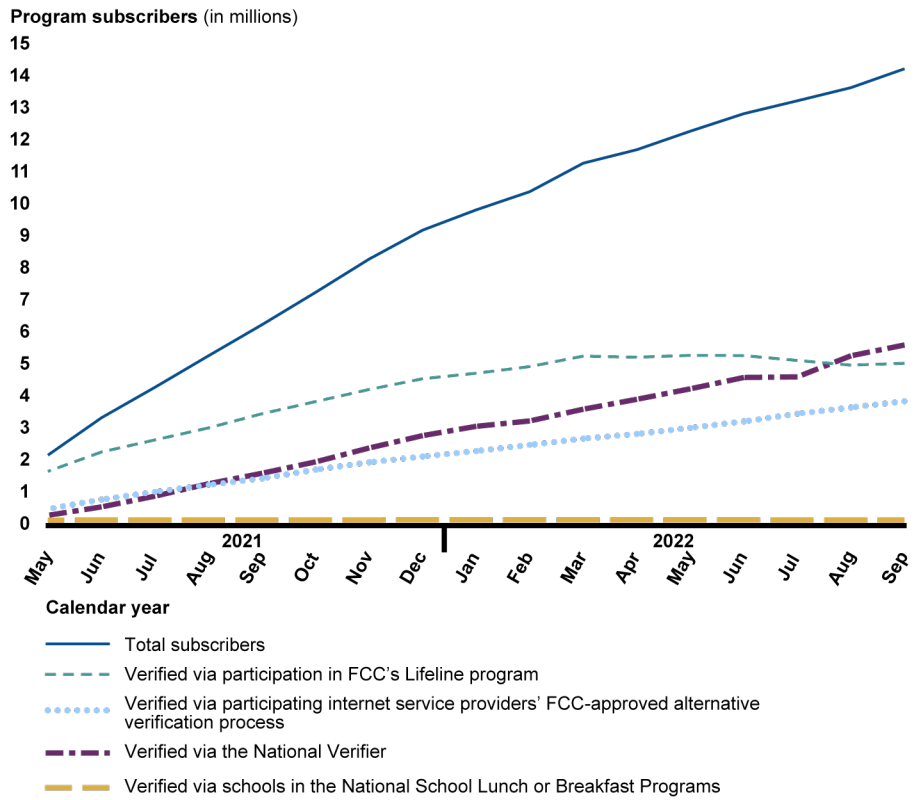
Note: The eligible population is estimated using data from the 2019 American Community Survey and Puerto Rico Community Survey. Households were identified as eligible if their previous year’s total income was less than or equal to 135 percent of the federal poverty thresholds or if any household member in the past 12 months participated in the Supplemental Nutrition Assistance Program, received income from various public assistance programs targeting low-income households, received supplemental security income, or—at the time of the surveys’ data collection—was covered by Medicaid (or any other government-assisted health insurance program for those with low incomes or a disability). As additional qualifying eligibility criteria cannot be identified in the American Community Survey and Puerto Rico Community Survey data, the eligibility estimate is a minimum.

Finally, regarding the criteria used to verify subscribers’ eligibility when enrolling in ACP, as of September 2022, the National Verifier accounted for about 39 percent of verifications, followed by participation in Lifeline (35 percent), a participating provider’s alternative verification process (26 percent), and a provider’s reliance on schools for verification of eligibility

Appendix II: Analysis of ACP and EBB Enrollment Data

via participation in the free and reduced price school lunch or breakfast programs (less than 1 percent). (See fig. 12.)

Figure 12: Enrollment in FCC’s Emergency Broadband Benefit Program (EBB) and Affordable Connectivity Program (ACP) by Method Used to Verify Program Eligibility, May 2021–September 2022



Source: GAO analysis of Federal Communications Commission (FCC) data. | GAO-23-105399

Note: EBB launched in May 2021. ACP replaced EBB on December 31, 2021.

Appendix III: Printable Versions of Interactive Figure 3

Figure 13: Printable Version of Interactive Figure 3 – Clarity and Accuracy



Clarity and accuracy

Definition:
Consumer-oriented content should be written in clear, easy-to-follow language that is factually accurate.

- Attributes:**
- Written in clear, consistent, easy-to-follow language
 - Authorship is clear
 - Free from factual errors
 - Online content is correctly formatted with accurate headings, images, and hyperlinks

Outreach material		Language of material									
		Chinese (Traditional and Simplified)		French		Korean		Spanish		Vietnamese	
		Clarity	Accuracy	Clarity	Accuracy	Clarity	Accuracy	Clarity	Accuracy	Clarity	Accuracy
Webpages	ACP main webpage	✓	⦿	⊘	⊘	⦿	⦿	✓	✓	✓	⦿
	Consumer FAQ webpage	✓	✓	⊘	⊘	⦿	⦿	✓	⦿	⦿	✓
Outreach toolkit	Fact sheet	⦿	✓	⦿	⦿	⦿	⦿	⦿	✓	✓	✓
	Consumer handout (9"x5")	⦿	⦿	⦿	✓	⦿	⦿	⦿	✓	⦿	✓
	Consumer handout (4"x4")	⦿	✓	⦿	✓	⦿	⦿	⦿	✓	⦿	✓
	PSA script	⊘	⊘	⊘	⊘	⊘	⊘	⦿	✓	⊘	⊘
	Newsletter blurb	⊘	⊘	⊘	⊘	⊘	⊘	⦿	✓	⊘	⊘
	Social media images	⊘	⊘	⊘	⊘	⊘	⊘	⦿	⦿	⊘	⊘
Overarching observations		Observations									
While all of the printed toolkit items we reviewed included the FCC logo, consumers may not recognize this logo and the items did not clearly state that FCC created these documents.		Language on both Traditional Chinese webpages was clear, and most content was accurate. However, there was a hyperlink on the ACP main webpage that linked to a webpage for the program's previous iteration, the Emergency Broadband Benefit program, rather than ACP.		While most of the French content was accurate, the fact sheet omitted key information on the device discount aspect of ACP.		The Korean webpages did not use consistent language throughout and had many grammatical errors and some inaccurate translations. The toolkit items also had grammatical errors, including misspellings.		While the Spanish webpages were consistently clear, there were some inaccurate elements in the Consumer FAQ webpage. For example, the webpage lists the same question twice with a different response to each question.		Language on the Vietnamese ACP main webpage was inconsistent, and the translation sometimes used obscure or uncommon terms.	

- ✓ **Met.** All of the translated content was clear and accurate.
- ⦿ **Partially met.** Some, but not all of the translated content was clear and accurate.
- ⊘ **Not available.** Material not translated.

Source: GAO analysis of Federal Communications Commission (FCC) Affordable Connectivity Program (ACP) documentation. | GAO-23-105399

Appendix III: Printable Versions of Interactive Figure 3

Figure 14: Printable Version of Interactive Figure 3 – Completeness



Completeness

Definition:
Non-English consumer-oriented content should match the content of its English version.

- Attributes:**
- Non-English content matches English content
 - Non-English web content contains the same hyperlinks as English web content

Outreach material		Language of material				
		Chinese (Traditional and Simplified)	French	Korean	Spanish	Vietnamese
		Completeness	Completeness	Completeness	Completeness	Completeness
Webpages	ACP main webpage	⊖	NA	⊖	⊖	⊖
	Consumer FAQ webpage	✓	NA	✓	⊖	✓
Outreach toolkit	Fact sheet	✓	✓	✓	✓	✓
	Consumer handout (9"x5")	✓	✓	✓	✓	✓
	Consumer handout (4"x4")	✓	✓	✓	✓	✓
	PSA script	NA	NA	NA	✓	NA
	Newsletter blurb	NA	NA	NA	✓	NA
	Social media images	NA	NA	NA	⊖	NA
Overarching observations		Observations				
<p>The non-English ACP main webpages we reviewed did not include information on upcoming outreach events, while the English ACP main webpage listed several events.</p>		<p>The Traditional Chinese ACP main webpage did not include any hyperlinks to the Consumer FAQ webpage, the webpage for consumers to file a complaint, nor the phone number for the ACP Support Center, which were included on the English ACP main webpage. It also did not include information on upcoming events.</p>		<p>The Korean webpages were missing content that was available on the English webpages. For example, the ACP main webpage did not include a phone number for the ACP Support Center and did not contain a hyperlink to the Consumer FAQ webpage.</p>	<p>The Spanish webpages were missing content that was available on the English webpages. For example, the ACP main webpage did not include a hyperlink to the Consumer FAQ webpage.</p> <p>The content on the Spanish toolkit items largely matched the English content. However, the Spanish social media images did not translate some of the eligibility criteria for the program and left this text in English.</p>	<p>The Vietnamese ACP main webpage did not list the phone number for the ACP Support Center and it did not list a link for consumers to file a complaint, which are both included on the English ACP main webpage.</p>

✓ **Met.** The non-English version of the material contained all of the content present on the English version.

⊖ **Did not meet.** The non-English version of the material did not contain all of the content present on the English version.

NA **Not available.** Material not translated.

Source: GAO analysis of Federal Communications Commission (FCC) Affordable Connectivity Program (ACP) documentation. | GAO-23-105399

Figure 15: Printable Version of Interactive Figure 3 – Practicality



Practicality

Definition:

Consumer-oriented content should be actionable and should direct consumers to assistance if needed.

Attributes:

- Steps to enroll are easy to understand
- Lists ways for users to obtain help in their native language if they have questions

Outreach material		Language of material				
		Chinese (Traditional and Simplified)	French	Korean	Spanish	Vietnamese
		Practicality	Practicality	Practicality	Practicality	Practicality
Webpages	ACP main webpage					
	Consumer FAQ webpage					
Outreach toolkit	Fact sheet					
	Consumer handout (9"x5")					
	Consumer handout (4"x4")					
	PSA script					
	Newsletter blurb					
	Social media images					
Overarching observations						
While most content had easy to understand steps for enrolling, they did not disclose how users could obtain help in their native language.						

Partially met. Some, but not all of the translated content was actionable or directed consumers to additional assistance.

Did not meet. The translated content was not actionable and did not direct consumers to additional assistance.

Not available. Material not translated.

Source: GAO analysis of Federal Communications Commission (FCC) Affordable Connectivity Program (ACP) documentation. | GAO-23-105399

Figure 16: Printable Version of Interactive Figure 3 – Managing Users’ Expectations



Managing users’ expectations

Definition:
Online consumer-oriented content should manage users’ expectations by disclosing when users are directed to content in different languages or on other websites.

- Attributes:**
- Hyperlinks that lead to different language content disclose that they do so
 - Hyperlinks that lead to different websites (i.e., non-FCC websites) disclose that they do so

Outreach material		Language of material			
		Chinese (Traditional and Simplified)	Korean	Spanish	Vietnamese
		Managing users’ expectations	Managing users’ expectations	Managing users’ expectations	Managing users’ expectations
Webpages	ACP main webpage	⊖	⊖	⦿	⊖
	Consumer FAQ webpage	⊖	⊖	⦿	⦿

Overarching observations

While all the hyperlinks on the Spanish webpages disclosed that they led to English content, the other non-English webpages did not have similar disclosures. Additionally, some hyperlinks did not disclose when they led to non-FCC websites in the same language as the rest of the webpage.

- ⦿ **Partially met.** Some, but not all of the hyperlinks disclosed when they led to different language content or when they led to different, non-FCC websites in the same language as the rest of the webpage.
- ⊖ **Did not meet.** None of the hyperlinks disclosed when they led to different language content or when they led to different, non-FCC websites in the same language as the rest of the webpage.

Source: GAO analysis of Federal Communications Commission (FCC) Affordable Connectivity Program (ACP) documentation. | GAO-23-105399

Appendix IV: Comment from the Federal Communications Commission



Federal Communications Commission
Washington, D.C. 20554

December 23, 2022

Andrew Von Ah
Director, Physical Infrastructure
Government Accountability Office
441 G Street NW
Washington, DC 20548

Dear Mr. Von Ah:

Thank you for the opportunity to review the GAO's draft report, "Affordable Broadband, FCC Could Improve Performance Goals and Measures, Consumer Outreach, and Fraud Risk Management." The Federal Communications Commission (FCC or Commission) is committed to closing the digital divide and bringing digital opportunity to all Americans. The Emergency Broadband Benefit Program (EBB Program) and the successor, Affordable Connectivity Program (ACP or Program), represent important steps towards bringing broadband connectivity to low-income consumers. We appreciate your recommendations as we continue to enhance the ACP in support of the FCC's mission.

On December 27, 2020, the Consolidated Appropriations Act, 2021 (Consolidated Appropriations Act) became law.¹ Among other actions intended to provide relief during the pandemic, the Consolidated Appropriations Act established an Emergency Broadband Connectivity Fund of \$3.2 billion in the Treasury of the United States for the fiscal year 2021,² to remain available until expended. The Consolidated Appropriations Act directed the Commission to use that fund to establish the EBB Program, under which eligible low-income households may receive a discount off the cost of broadband service and certain connected devices during an emergency period relating to the COVID-19 pandemic, and participating providers can receive a reimbursement for such discounts.³ The FCC's primary focus, consistent with its statutory directive to quickly distribute support to help low-income households stay connected during the COVID-19 pandemic, was to expeditiously set up rules, systems, and processes to administer the program leveraging existing resources to the maximum extent possible. To that extent, the Commission's roll-out of the EBB Program was successful. The Commission adopted final rules and met the expected timeline to roll-out the EBB Program on February 25, 2021 (60 days following enactment of the statute). The Commission began accepting provider participation applications and elections on March 8, 2021 (11 days after final rules). The EBB Program began accepting consumer applications on May 12, 2021 (76 days after final rules).

Building upon the success of the EBB Program, the enactment of the Infrastructure Investment and Jobs Act (IIJA) on November 15, 2021 modified and extended the EBB Program to a longer-term

¹ Consolidated Appropriations Act, 2021, Pub. L. No. 116-260, 134 Stat. 1182 (2020), available at <https://www.congress.gov/bills/116/consolidated-appropriations-act> (Consolidated Appropriations Act).

² *Id.* § 904(i).

³ *Id.* § 904(b)(1). Under section 904, the emergency period "ends on the date that is 6 months after the date on which the determination by the Secretary of Health and Human Services pursuant to section 319 of the Public Health Service Act (42 U.S.C. § 247d) that a public health emergency exists as a result of COVID-19, including any renewal thereof, terminates." *Id.* § 904(a)(8).

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broadband affordability program, the ACP.⁴ Congress directed to the Commission to launch the ACP by December 31, 2021 (46 days after enactment) while also providing for adoption of final rules for the new ACP 60 days after enactment. Again, the Commission was successful in launching the ACP on December 31, 2021, issuing necessary guidance during this transition period, and adopting final rules on January 14, 2022.⁵ We appreciate the GAO's acknowledgement that the Commission has made significant progress in quickly implementing the Program under the timelines required by the IJJA. Further, we agree with the GAO that the Commission's efforts to establish Program performance goals and measures, dedicate funds to outreach and translate its outreach materials into non-English languages, and conduct a program fraud risk assessment demonstrate the Commission's commitment to the Program's success.

In the report, the GAO makes nine recommendations to help the Commission enhance the ACP's performance goals and measures, language translation process, consumer outreach plan, and various processes for managing fraud risk. We respond and provide a plan to address each recommendation below.

The report's first recommendation is, "the Chair of the FCC should ensure that ACP performance goals and measures align with key attributes of effective performance goals and measures (Recommendation 1)." We agree with this recommendation, and we are taking the following actions to implement it. In the adoption of final FCC rules for the ACP after an expedited 60-day rulemaking period mandated by Congress, the FCC established three performance goals for the ACP: 1) reduce the digital divide for low-income consumers, 2) promote awareness and participation in the ACP, and 3) ensure efficient and effective administration of the ACP.⁶ The Commission also provided detail on how to measure progress toward those performance metrics, but we agree that the performance goals should include more specific and clearly defined targets, particularly at this stage of the Program.

For the first goal, reducing the digital divide for low-income consumers, we plan to utilize surveys as well as adoption rates by Census tract to analyze our progress. The current performance goals do not state a specific number or percentage of total ACP subscribers that we aim to have as first-time broadband subscribers enroll in the ACP. This is partly because we did not have insight into how many ACP households are first-time broadband users at a baseline level at the launch of the Program. Without a baseline estimate, setting a specific target or number would be arbitrary. Thus, at the outset of the ACP, we set a goal of increasing the number of first-time broadband enrollments over time. FCC staff directed the Universal Service Administrative Company (USAC), the administrator of the ACP, to initiate a pilot to test potential outreach methods to ACP subscribers and applicants. That recent pilot included a survey question regarding prior internet access and approximately 16% of respondents indicated they had no internet access prior to enrollment in the ACP. Commission staff and USAC are developing a plan informed by the results of the outreach pilot to send a survey on prior internet use to a greater segment of the ACP enrolled households. We expect to begin sending the survey on prior internet use to a broader group of ACP subscribers by July 1, 2023. By that time, the Commission's expanded efforts through the

⁴ Infrastructure Investment and Jobs Act, Public Law 117-58, div. F, tit. V, § 60502 (2021) (IJJA); 47 U.S.C. § 1752.

⁵ *Affordable Connectivity Program*, WC Docket No. 21-450, Report and Order and Further Notice of Proposed Rulemaking, FCC 22-2 (Jan. 14, 2022) (*ACP Order*).

⁶ *ACP Order* at 98, paras. 210-13 (establishing performance goals for the ACP); *id.* at 3-4, para. 3 (explaining the expedited rulemaking timeline for establishing rules for the ACP).

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ACP Outreach Grant Program⁷ and the ACP Pilot Programs⁸ as well as the launch of a paid media campaign to raise awareness of and increase enrollment in the ACP will be underway. Thus, it is our goal to see the number of respondents who recently enrolled in the ACP and who indicate they are using the benefit for a first-time broadband connection increase by 5% each quarter from the prior quarter's results.⁹ If USAC begins broader outreach in July, we expect to have sufficient information to establish a baseline number in September. Therefore, we aim for the outreach conducted in October, three months after the first outreach, to meet our target by showing a 5% increase compared to the prior quarter's outreach results.

The second stated goal of the ACP is to increase awareness and participation in the program. The FCC currently tracks the ACP participation rate,¹⁰ however, we have not set a specific target for the ACP participation rate. We clarify here that our goal is to see the participation rate increase each month between 1.5% and 3%. Utilizing the Center of Poverty and Social Justice's estimate of 48.6 million eligible ACP households,¹¹ we estimate approximately 30.2% of eligible households were enrolled as of November 1, 2022. Thus, under our proposed target of a 1.5% and 3% monthly increase in the participation rate we would aim for the annual participation rate to be between 36.1% and 43.1% by November 1, 2023, based on the current estimates of eligible ACP households. Each month's percentage increase will be calculated using the total enrollment as of the first of the month (i.e., snapshot date); thus, it will account for the prior month's enrollments and de-enrollments. Therefore, our goal is to see 1.5% to 3% growth each month despite de-enrollments that may occur as a result of the nature lifecycle of the program, including typical household de-enrollments and those occurring due to programmatic controls to combat waste, fraud, and abuse.

For the third goal, we plan to measure ease of applying to the ACP through consumer surveys of recently enrolled subscribers and by tracking the applications that pass a program eligibility database check. USAC recently conducted outreach to a random sample of 5,000 recently enrolled ACP subscribers to seek feedback on the application process. In November 2022, USAC reported to the FCC that approximately 71.2% of respondents found the application and enrollment process easy to complete, 24.3% found it somewhat easy, and 4.6% indicated it was not easy at all. The FCC is continuously working to improve the application process for consumers and is launching pilot programs to test ways to increase participation among eligible households, including by offering application assistance from trusted community members. We expect USAC to begin conducting additional consumer surveys by July

⁷ *Affordable Connectivity Program*, WC Docket No. 21-450, Second Report and Order, FCC 22-64 (Aug. 5, 2022) (*ACP Outreach Grant Program Order*).

⁸ *ACP Order*, at 37, para. 70 (establishing the ACP Navigator Pilot); *Affordable Connectivity Program*, WC Docket No. 21-450, Third Report and Order, FCC 22-65 (Aug. 5, 2022) (*Your Home, Your Internet Order*) (establishing the Your Home, Your Internet Pilot).

⁹ For example, a 5% increase in the percentage of responses from the current 16% of respondents indicating they had no prior broadband service would result 16.8% of respondents who recently enrolled stating they were a first-time broadband user. The goal would result in the following quarter growing to 17.64%.

¹⁰ For ACP purposes, the Commission determines the participation rate by establishing the percentage of the total estimated eligible household population that is actively enrolled in the program.

¹¹ Katherine Friedman and Christophe Wimer, *Understanding the Potential Reach of the Affordable Connectivity Program*, Center on Poverty and Social Policy, Columbia University, May 4, 2022, available at <https://www.povertycenter.columbia.edu/publication/2022/affordable-connectivity-program>.

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31, 2023. Our goal by one year after the awards are issued for the ACP Pilot Programs or April 30, 2024, whichever is later, is to see an increase of 5% in the number of respondents who found the enrollment process easy to complete, which would be approximately 75% of respondents. Additionally, we aim to reduce the number of respondents who found the application and enrollment process “not easy at all” by approximately 15%, which would be approximately 4% of respondents.

Additionally, for the third goal, we also plan to measure the speed of applying for the ACP through multiple metrics. One potential method is to examine the average time each applicant spends on each page of the application. The Commission and USAC are exploring the feasibility of measuring how long a consumer spends on each page of the application. Our goal is to determine if this is a viable metric in early 2023. If it is, then we will work to establish a baseline and track the average time per page. From there, the Commission will work to continue improving the application process, and track if each change has an impact on the baseline. Our goal is to enact at least one round of changes that show a decrease in the average number of minutes spent on one page of the application. Additionally, we plan to improve the speed of applying for the ACP through the National Verifier by aiming for a lower percentage of qualified applications that require manual review and increasing the percentage of applications that are automatically qualified. The National Verifier is designed to ease the qualification process by leveraging connections with state and federal database connections. Eligibility database connections greatly increase the speed at which applicants are verified, as applicants found in these databases can be verified almost immediately. The Commission and USAC have been focused on working with state and federal partners to establish data-matching connections that allow for automated eligibility verification of low-income consumers participating in other qualifying programs. To date, we have established connections with three federal agencies and 22 states and territories, with more connections coming online in early 2023.¹² From December 31, 2021 through December 1, 2022, the National Verifier automatically verified the eligibility of up to 43% of ACP applicants applying through the National Verifier in states where it has a state and federal connection, and up to 59% of ACP National Verifier applicants nationwide. With additional state and federal partner data-matching connections established, we believe these rates can increase. The FCC and USAC will continue to monitor the status of state and federal partner outreach, the application pass rate, and the application activity, especially in light of increased application assistance and awareness efforts to implement this recommendation.

While we are generally supportive of the GAO’s first recommendation to ensure that performance goals and measures align with key attributes of effective performance goals and measures, we disagree that using the monthly dollar figure to measure overall consumer burden will be distorted by increased participation. Program funding is used for reimbursement and program administration. Based on our experience with the EBB Program, Lifeline, and the ACP, we do not expect the Program’s administration costs to increase per subscriber as the enrollment in the program increases. Thus, as the number of subscribers in the program increases, the reimbursement total will be higher, but the program administration costs will generally not increase per subscriber. As participation increases the total administrative costs per household should decline. Our goal is to see this ratio decline over time; specifically, we aim to have this ratio calculated for all previous months by the end of January 2023. At that point, we will be able to calculate historic month-over-month changes and propose a specific and realistic numeric target for future months. The FCC and USAC will continue to monitor the impact of increased enrollment on the program’s administration costs to implement this recommendation.

¹² USAC, *ACP Database Connections*, <https://www.usac.org/about/affordable-connectivity-program/acp-processes/check-consumer-eligibility/database-connections/> (last visited Dec. 23, 2022).

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We disagree that these goals do not meet the crosscutting criteria. The GAO report defines crosscutting as “goals of programs contributing to the same or similar outcomes are complementary to permit comparisons of results and identification of wasteful duplication, overlap, or fragmentation.” For the third goal, improving the ease and speed of the application process, is relevant to Lifeline because Lifeline also utilizes the National Verifier. An increase in number of database connections for the ACP and Lifeline, for example, will increase the ease and speed of the verification step of the application process in both programs. For the first performance metric, we are able to tie consumer responses to USAC surveys to those that are also in the Lifeline program (or ask the respondent if they are enrolled in Lifeline). For example, subscribers can utilize their Lifeline subsidy for voice and their ACP subsidy for broadband. Thus, there may be Lifeline subscribers who are using their ACP subsidy for a first-time broadband connection. Capturing this does meet the crosscutting criteria. Additionally, for outreach surveys conducted on ACP awareness, we plan to include questions about the respondent’s awareness of Lifeline, thus satisfying the crosscutting criteria for the second measure. Lastly, participation rates are calculated for Lifeline and can be compared to the ACP. We can also measure the percentage of Lifeline consumers participating in the ACP, which again addresses the crosscutting criteria.

The report’s second recommendation is, “the Chair of the FCC should revise the language translation process (for both ‘in-house’ and contracted translations, as appropriate) for developing ACP non-English outreach materials to include the following steps: (1) Develop a plan for designing and producing translated products; (2) Incorporate review and quality assurance steps into the translation process and document completion of these steps during each process; (3) Develop and test the products with others who represent its intended audience; and (4) Update and finalize the products based on development and testing results. (Recommendation 2).” We agree with this recommendation, and we are taking the following actions to implement it. First, the FCC will develop a plan that reflects the goals and intended audience for its translated products. The plan will include target languages. Second, when the Commission sought a new translation vendor, we prioritized a quality control process that provides the Commission with deliverables that attest to the completion of the review and assurance efforts that the contractor has agreed to in the performance work statement. The new translations vendor offers expanded language services, and our contract with this vendor clearly defines quality control standards that include two independent reviews per translation request. We will develop a similar quality control process for internal translations. Third, the FCC established a new bilingual (English-Spanish) full-time copy writer position that will collaborate with our in-house Spanish translator and contractors to ensure consistency and oversee quality control for all translated materials. Steps to fill the position are underway. Documentation of the adherence to the steps completed during each process for both internal- and contractor-completed translations will be retained. Fourth, the FCC contracted a strategic communications firm to develop a strategic plan for paid and earned media that includes the design of new ACP promotional materials. Materials will be produced in English and 12 other languages, consistent with the Census “non-English language support” guidance (which includes Spanish, Chinese, Vietnamese, Korean, Russian, Arabic, Tagalog, Polish, French, Haitian Creole, Portuguese, and Japanese). Both ACP and EBB Program non-English outreach materials have benefited from updates made in response to stakeholder feedback. We will take steps to formalize and enhance our language translations process for ACP non-English outreach materials to include testing the products with representatives from the intended audience and then updating and finalizing products based on development and testing results. The process will include community review by native speakers to test the effectiveness of translated products and allow the FCC to adapt as needed before publishing.

The report’s third recommendation is, “the Chair of the FCC should develop a consumer outreach plan to educate eligible consumers about ACP that aligns with leading practices for consumer outreach

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planning (Recommendation 3).” We agree with this recommendation, and we are taking the following actions to implement it. First, the FCC is expanding its outreach efforts by establishing and implementing the Affordable Connectivity Outreach Grant Program (ACP Outreach Grant Program). The ACP Outreach Grant Program provides eligible governmental and non-governmental entities with the funding and resources needed to increase awareness of and participation in the Affordable Connectivity Program among eligible households in need of affordable connectivity. The ACP Outreach Grant Program seeks to expand innovative outreach efforts nationwide by strengthening partner networks and empowering them with the resources necessary to increase program awareness and enrollment, with a focus on reaching historically unserved and underserved populations. The ACP Outreach Grant Program allocates \$60 million dollars for a National Competitive Outreach Program, and \$10 million dollars for a Tribal Competitive Grant Program. The FCC has committed a minimum funding allocation of \$500,000 to each State (including the District of Columbia and Puerto Rico) and \$250,000 to each U.S. Territory for ACP outreach activities.

The FCC also established two additional ACP Pilot Programs: (1) the Your Home, Your Internet Pilot Program; and (2) the ACP Navigator Pilot Program. The Your Home, Your Internet Pilot Program is a one-year pilot program designed to increase awareness of the ACP, specifically among recipients of federal housing assistance. The Your Home, Your Internet Pilot Program provides grant funding to federal agencies and their partners; state, local, and Tribal housing agencies; tenant associations; and non-profit and community-based entities to increase awareness and encourage participation in the ACP among households receiving federal housing assistance. The ACP Navigator Pilot Program is a one-year pilot that will provide a limited number of neutral, trusted third party entities, such as schools and school districts, or other local, Tribal or state government entities, access to the National Verifier for purposes of assisting consumers with completing and submitting an application for the ACP. The ACP Navigator Pilot Program provides grant funding to support outreach activities, including application assistance, by trusted, neutral third-party entities, such as schools and school districts, or other local or state government entities, to increase awareness and encourage participation in the ACP among eligible households. The ACP Outreach Grant Program and Pilot Programs are currently accepting applications through January 9, 2023, with anticipated awards on or by March 10, 2023.

Second, the FCC is incorporating paid and earned media as a critical component of outreach. We have recently procured a paid media contract to develop a strategic paid and earned media plan, including the development of effective multilanguage messaging, and are finalizing procurements to develop consistent non-English language outreach campaigns that will target diverse and linguistically isolated communities.

Third, the FCC is also working to expand its internal outreach and engagement capacity to develop a national strategy to promote the ACP that aligns with the nine leading practices for effective outreach planning.¹³ The Commission has established a team to lead and implement the ACP Outreach Grant Program, and is planning to incorporate additional team members, Community Impact Managers, to oversee outreach in a region of the country and focus on historically unserved and underserved communities.

¹³ These practices are identified within GAO’s report on pages 25-26 and include: 1) analyze the situation; 2) identify stakeholders; 3) identify credible managers; 4) design media mix; 5) define goals and objectives; 6) identify resources; 7) research target audiences; 8) develop consistent, clear messages; and, 9) establish metrics to measure success

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The FCC is in the process of developing a comprehensive community engagement plan that defines clear goals and objectives to measure the success of outreach, leverages new and existing FCC outreach resources, incorporates research informed messages (translated into 12 languages), and a paid and earned media mix which will be universally available and reported on to the FCC's list of 50,000 outreach partners and state-based ACP Outreach Grant recipients. This comprehensive outreach plan will leverage a diverse mix of tools needed to reach a target goal of increasing ACP participation by 1.5% to 3% monthly and ensure that the funds allocated to ACP outreach are effective and responsive to the ground truth of communities across the nation.

The report's fourth recommendation is, "the Office of Managing Director [(OMD)] should develop and implement a process, with clearly defined responsibilities and sources of information on fraud risks, for conducting fraud risk assessments for ACP at regular intervals and when there are changes to the program or operating environment (Recommendation 4)." We agree with this recommendation and are taking steps to implement it. As GAO has acknowledged, the Commission is in the process of implementing GAO's Fraud Risk Framework for Managing Fraud Risks in Federal Programs. As part of that process, the FCC's dedicated entity for fraud risk management is developing a new chapter to its policies and procedures to fully document this new fraud risk process being instituted that will satisfy this recommendation.

The report's fifth recommendation is, "the Office of Managing Director should develop and implement an antifraud strategy for ACP that aligns with leading practices in the Fraud Risk Framework. These practices include documenting and communicating the program's activities for preventing, detecting, and responding to fraud and establishing roles and responsibilities of those involved in fraud risk management activities (Recommendation 5)." We agree with this recommendation and are taking action to implement it. OMD has engaged a consultant to conduct several tasks to assist in developing an antifraud strategy for the ACP that aligns with leading practices in the GAO's Fraud Risk Framework. In doing so, the strategy is designed to include advanced data analysis and supporting visualization on the full universe of ACP data to identify relevant trends, variables, and relationships. Results from this analysis will inform the codification of an antifraud strategy which:

- Documents all existing fraud risk prevention practices, including internal controls;
- Identifies gaps in existing fraud risk procedures;
- Creates procedures and templates that can be leveraged for preventing, detecting, and responding to fraud;
- Develops and documents an annual Fraud Risk Assessment workflow process; and,
- Identifies and documents key roles / responsibilities for monitoring controls and conducting fraud assessments at regular intervals and when there are changes to the program or operating environment.

The report's sixth recommendation is, "the Office of Managing Director should develop processes to monitor its antifraud controls related to preventing duplicate subscribers in ACP (Recommendation 6)." We agree with this recommendation, and OMD is overseeing the actions in response. Since the launch of the EBB Program, existing system controls have been in place to prevent duplicate subscribers based on matching household Personal Identifiable Information (PII). Throughout the lifecycle of the EBB Program and the ACP, these controls have been reviewed through recurring quality control analyses and audited to ensure their effectiveness. USAC has and continues to make modifications in its duplicate identification and prevention. In particular for the ACP, in coordination

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with USAC, system controls have been analyzed for identifying duplicate subscribers enabling USAC to develop enhanced system functionality that will prevent such enrollments. This enhanced system functionality was deployed on December 8, 2022. In addition, since August 2022, USAC has performed monthly inspection of all subscribers in the ACP and de-enrolled any duplicate subscribers. OMD also looks forward to analyzing GAO's duplicate subscriber data and analytics to further improve the ACP processes for preventing duplicate subscribers.

The report's seventh recommendation is, "The Office of Managing Director should develop processes to monitor its antifraud controls related to subscriber identity verification in ACP (Recommendation 7)." We agree with this recommendation, and OMD is overseeing actions in response. Specifically, USAC will review its subscriber data to identify subscribers under 18 and subscribers over 100 years old to determine how many of such subscribers are ineligible. In addition to de-enrolling these ineligible subscribers, USAC plans to determine the root cause of ineligible subscribers entering the program. Based on this root cause analysis, USAC will identify and implement system or audit controls to strengthen the validation of subscribers' identity information. OMD also looks forward to analyzing GAO's subscriber identity verification data and analytics to further improve the ACP processes for preventing ineligible subscribers, including additional information on the social security number analysis.

The report's eighth recommendation is, "the Office of Managing Director should develop processes to monitor its antifraud controls related to subscriber address validation in ACP (Recommendation 8)." We agree with this recommendation, and OMD is overseeing actions in response. USAC, on a quarterly basis, will review its residential address data to identify subscribers using post office boxes as their residence of record. USAC will then conduct outreach to such subscribers and inform them they are required to update their post office box address with the subscriber's residential street address. In instances where a subscriber does not comply, USAC will de-enroll the subscriber. OMD also looks forward to analyzing GAO's subscriber address verification data and analytics to further improve the ACP processes for preventing ineligible subscribers.

The report's ninth recommendation is, "the Office of Managing Director should use information obtained from monitoring processes to improve the design and implementation of its fraud risk management activities in ACP, including its fraud risk assessment and subsequent antifraud strategy (Recommendation 9)." We agree with this recommendation, and we are taking the following actions to implement it. OMD's consultant, as discussed above, plans to obtain and analyze data from several processes to improve fraud risk management activities. This analysis will examine the universe of ACP data to identify any areas of interest related to improper payments, program non-compliance, fraud, or general programmatic risk. Analytics will be guided, in part, by key questions developed in conjunction with FCC and USAC. The results of the analysis will influence the understanding and development of FCC's antifraud strategy discussed above (i.e., Recommendation 5) by providing insights "to improve the design and implementation of fraud risk management activities in ACP." In addition, USAC plans to improve its fraud risk management through controls designed to identify suspicious documents and activity arising from National Verifier uploads, data analytics, and whistleblower complaints.

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The FCC and USAC believe that the actions described in this letter will address each of the GAO's recommendations and ultimately improve the Affordable Connectivity Program to build upon its current success. Ensuring broadband access for more than 48.6 million eligible households through use of the benefit is one of the FCC's most critical missions. Broadening awareness and participation while also safeguarding the program from waste, fraud, and abuse remain important goals for the Commission. Thank you for the opportunity to review the GAO's recommendations. We look forward to working with the GAO in the future.

Sincerely,

Mark
Stephens 
Mark Stephens
Managing Director

Appendix V: GAO Contact and Staff Acknowledgments

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Staff Acknowledgments

In addition to the contact named above, Andrew Huddleston (Assistant Director); Nalylee Padilla (Analyst in Charge); Melissa Bodeau; Emily Crofford; Melanie Diemel; Gabrielle Fagan; Myra Francisco; James Healy; Gina Hoover; Alec McQuilkin; Brenda Mittelbuscher; Rebecca Shea; Royal Srem-Sai; and Janet Temko-Blinder made key contributions to this report.

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