GAO

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Report to Congressional Requesters

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TELECOMMUNICATIONS

FCC Has Implemented the Lifeline National Verifier but Should Improve Consumer Awareness and Experience

GAO@100

A Century of Non-Partisan Fact-Based Work

GAO-21-235

Highlights

TELECOMMUNICATIONS

FCC Has Implemented the Lifeline National Verifier but Should Improve Consumer Awareness and Experience

Why GAO Did This Study

FCC's Lifeline program discounts phone and internet service for eligible low-income consumers. In 2019, FCC authorized $982 million in support for 6.9 million eligible consumers. FCC created the Verifier with the stated goals of reducing fraud and costs and improving the consumer experience. The Verifier includes an online application, connections to state and federal benefits databases, and a standardized manual review process.

GAO was asked to review FCC's implementation of the Verifier. This report examines: (1) the status of the Verifier; (2) FCC's coordination with stakeholders and efforts to educate consumers and facilitate tribal stakeholders' involvement; and (3) the extent to which the Verifier is meeting its goals.

GAO reviewed FCC orders and documentation; analyzed Verifier performance and Lifeline subscriber data; interviewed FCC and other agency officials, and selected industry, state, tribal, and consumer stakeholders; and surveyed state officials. Stakeholders were selected to obtain a variety of non-generalizable viewpoints.

What GAO Recommends

GAO is making six recommendations, including that FCC develop a consumer education plan, provide quality information to tribal organizations, and collect information on consumers' experience with the manual review process. FCC agreed to take steps to address all of GAO's recommendations.

View GAO-21-235. For more information, contact Andrew Von Ah at (202)-512-2834 or vonaha@gao.gov.

What GAO Found

As of June 2020, the Federal Communications Commission (FCC) required consumers nationwide to use the Lifeline National Verifier (Verifier), a centralized process and data system, to check their eligibility for Lifeline. Because consumers who participate in certain federal benefits programs qualify for discounted phone and internet service through Lifeline, the Verifier checks state and federal benefits databases to verify consumers' eligibility. The Verifier also includes a manual review process for consumers to submit documents proving their eligibility if they cannot be found in a database. As of November 2020, the Verifier had connections with databases in 20 states and 2 federal agencies. GAO found that although consumers in states without state database connections had the same likelihood of actually meeting eligibility requirements as consumers in states with such connections, they were less likely to be found eligible for Lifeline through the Verifier (see figure).

Average Eligibility Determination for New Lifeline Applicants in States with and without State Database Connections to the Lifeline National Verifier, June 2018 through June 2020
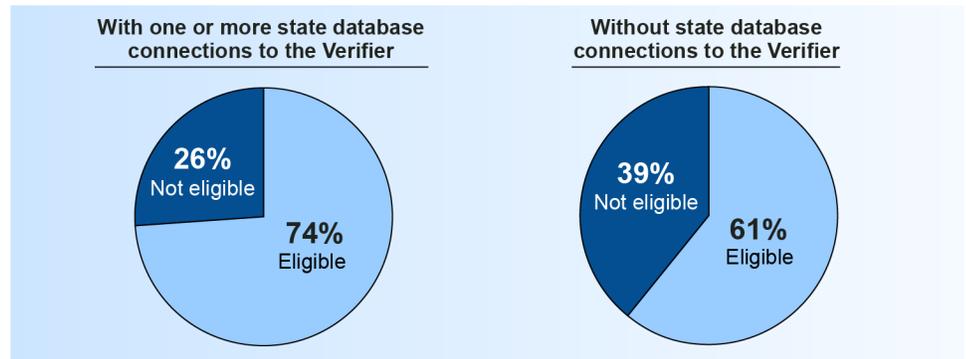
Source: GAO analysis of Federal Communications Commission data. | GAO-21-235

FCC coordinated with state and federal stakeholders to implement the Verifier. However, stakeholders told GAO that many eligible consumers are not aware of the Verifier or Lifeline. Consumers may lack this awareness because FCC's consumer education planning did not always align with key practices, such as developing consistent, clear messages and researching target audiences. As a result, eligible consumers may not apply for Lifeline. Moreover, while FCC originally envisioned tribal governments and organizations assisting residents of tribal lands with the Verifier, it has not provided them with quality information to effectively do so.

Although FCC reported that the Verifier is meeting its goal of improving the consumer experience, GAO found that the manual review process, which FCC used to determine the eligibility of more than half of applicants in many states, is challenging for consumers. However, FCC does not collect complete information on consumers' experience with this process, and thus is limited in its ability to identify and address the challenges consumers face. Such challenges likely contributed to eligible consumers giving up on their applications. For example, we found that more than two-thirds of applicants who underwent manual review between June 2018 and June 2020 did not complete their applications.

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Abbreviations

API	application programming interface
BIA	Bureau of Indian Affairs
Carrier	Eligible Telecommunications Carrier
CMA	Computer Matching Agreement
COVID-19	Coronavirus Disease 2019
FCC	Federal Communications Commission
FNS	Food and Nutrition Service
FPHA	Federal Public Housing Assistance
GSA	General Services Administration
HUD	Department of Housing and Urban Development
IRS	Internal Revenue Service
Lifeline	Lifeline Program
PUC	Public Utility Commission
SNAP	Supplemental Nutrition Assistance Program
SSA	Social Security Administration
SSI	Supplemental Security Income Program
USAC	Universal Service Administrative Company
USF	Universal Service Fund
VA	Department of Veterans Affairs
Verifier	National Lifeline Eligibility Verifier

January 28, 2021

Congressional Requesters:

Since 1985, the Federal Communications Commission (FCC) has supported telecommunications access for low-income consumers through the Lifeline program (Lifeline), one of four universal service programs designed to help ensure that affordable telecommunications services are available to the greatest number of Americans possible.[1] Traditionally, Lifeline discounted only phone services for eligible low-income consumers, but in a 2016 Order FCC modernized Lifeline to also discount broadband service, recognizing its importance to participation in society and the affordability barriers to broadband adoption.[2] According to FCC, 25 percent of eligible Americans nationwide were enrolled in Lifeline in 2020, and in 2019 FCC authorized about $982 million to Lifeline eligible telecommunications carriers (carriers) in support for 6.9 million Lifeline subscribers.[3]

When it modernized the Lifeline program in 2016, FCC also fundamentally changed how consumers' eligibility for Lifeline support is verified. Historically, carriers verified that consumers met Lifeline eligibility requirements before providing them with discounted service. In response to concerns that FCC's reliance on carriers to make such eligibility determinations left the Lifeline program vulnerable to waste, fraud, and

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[1]The other three programs are (1) high-cost, which assists telecommunications carriers serving high-cost, rural, or insular areas; (2) Schools and Libraries, or "E-rate", which assists eligible schools and libraries in procuring telecommunications services, internet access services, internal connections, and basic maintenance of internal connections; and (3) Rural Health Care, which assists eligible health-care providers through discounts for broadband and telecommunications services.

[2]See Federal Communications Commission, *Lifeline and Link Up Reform and Modernization, Third Report and Order, Further Report and Order, and Order on Reconsideration,* 31 FCC Rcd. 3962 (2016). In this report, we refer to this as the 2016 Modernization Order.

[3]Lifeline subscribership for 2020 reflects subscribership in October 2020, but subscribership may fluctuate throughout the year. FCC derived participation rates for 2020 from actual Lifeline subscribership and estimates of eligible households based on the 2019 American Community Survey from the U.S. Census Bureau. Authorized support includes all funding approved for disbursement for calendar year 2019, including funding approved but not yet disbursed.

abuse, FCC established the National Lifeline Eligibility Verifier (Verifier).[4] The Verifier centralizes authority for eligibility determinations with the Universal Service Administrative Company (USAC)—a not-for-profit corporation that has administered Lifeline since 1998—and includes a set of standardized processes and supporting data systems. FCC established three goals for the Verifier: (1) to protect against and reduce waste, fraud, and abuse; (2) to lower costs to the government and Lifeline carriers through administrative efficiencies; and (3) to better serve eligible consumers by facilitating choice and improving the enrollment experience.[5] To implement the Verifier, FCC instructed USAC to coordinate with a variety of stakeholders, including state and federal agencies, carriers, and tribal governments.[6] USAC began a phased launch of the Verifier in June 2018, and required use of the Verifier in almost all 50 states, five U.S. territories, and the District of Columbia as of June 2020.[7]

You asked us to review FCC's implementation of the Verifier. This report examines (1) the status of the Verifier; (2) the extent to which FCC coordinated with state and federal stakeholders, educated consumers, and facilitated involvement of tribal stakeholders; and (3) the extent to which the Verifier is meeting its goals.

To address all three objectives, we reviewed FCC's documents and orders on its implementation of the Verifier, including the 2016

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[4]31 FCC Rcd. 3962, ¶ 129 (2016).

[5]31 FCC Rcd. 3962, ¶ 128 (2016).

[6]31 FCC Rcd. 3962, ¶ 135 (2016).

[7]For the purposes of our report, we will refer to these as "states." The Verifier was available for use in all states as of December 2019, but many states were not required to use the Verifier until later in 2020. We consider full implementation to occur when use of the Verifier is required in a state.

Modernization Order, as well as our prior reports on Lifeline.[8] We also analyzed FCC and USAC data on the Verifier's performance, subscribership, and participation rates from June 2018, when the Verifier first launched, to June 2020, the most recent data available at the time of our review. We determined these data to be sufficiently reliable for our reporting purposes of describing the Verifier's performance and changes in subscribership and participation over time based on, among other steps, manual and electronic reviews. Additionally, we interviewed a selection of industry, tribal, and consumer stakeholders regarding their coordination with FCC and USAC and experiences using the Verifier. In total, we selected 25 stakeholders for variety based on a range of factors such as the population they represent, geographic location, and recommendations or public comments in FCC's Lifeline docket. While these interviews are not generalizable, they provided us with a variety of perspectives on the Verifier's implementation. For reporting purposes, we developed the following series of indefinite quantifiers to describe collective responses from the 25 stakeholders we interviewed including: "a few" (three to five); "some" (six to nine); "about half" (10 to 15); "most" (16 to 20); and "almost all" (21 to 24).

To determine the extent to which FCC coordinated with state and federal stakeholders, educated consumers, and facilitated involvement of tribal

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[8]See *Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, 27 FCC Rcd. 6656 (2012); *Lifeline and Link Up Reform and Modernization, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order,* 30 FCC Rcd. 7818 (2015); 2016 Modernization Order; *Lifeline and Link Up Reform and Modernization, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry,* 32 FCC Rcd. 10475 (2017); *Lifeline and Link Up Reform and Modernization, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 34 FCC Rcd. 10886 (2019); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-285 (WCB Mar. 17, 2020); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-354 (WCB Mar. 30, 2020); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-462 (WCB Apr. 29, 2020); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-577 (WCB Jun. 1, 2020); *Lifeline and Link Up Reform Modernization,* WC Docket No. 11-42, Order, DA 20-891 (WCB Aug. 17, 2020); *Lifeline and Link Up Reform Modernization*, WC Docket No. 11-42, Order, DA 20-1357 (WCB Nov.16, 2020). See GAO, *Telecommunications: Additional Actions Needed to Address Significant Risks in FCC's Lifeline Program*, GAO-17-538 (Washington, D.C.: May 30, 2017); GAO, *Telecommunications: FCC Should Evaluate the Efficiency and Effectiveness of the Lifeline Program*, GAO-15-335 (Washington, D.C.: Mar. 24, 2015); GAO, *Telecommunications: Improved Management Can Enhance FCC Decision Making for the Universal Service Fund Low-Income Program*, GAO-11-11 (Washington, D.C.: Oct. 28, 2010).

stakeholders, we administered two surveys: one to state public utility commissions and one to state health agencies.[9] The response rate for our surveys was 89 percent (50 of 56) and 80 percent (45 of 56), respectively. For copies of the survey questionnaires and consolidated results, see app. I. Further, we interviewed three state health agencies, selected based on survey responses, and interviewed officials from all seven federal agencies that own data on federal programs that qualify consumers for Lifeline to learn about FCC's efforts to collaborate with these agencies. We also reviewed written data-sharing agreements between FCC and state and federal agencies. We compared this information to leading collaboration practices identified in our previous work.[10] In addition, we assessed USAC's consumer education efforts, based on interviews with USAC officials and internal documents, against selected key practices for consumer education planning identified in our previous work.[11] We also assessed whether FCC and USAC were externally communicating quality information about the Verifier to tribal governments, as called for in federal internal control standards, based on FCC and USAC documents and our interviews with tribal stakeholders.[12]

To assess the extent to which the Verifier is meeting the three goals FCC identified for it, we interviewed FCC and USAC officials and took a number of specific steps for each goal. For example, we reviewed FCC documentation on how the Verifier addresses fraud risks and FCC's efforts to detect fraud. We also reviewed cost documentation and measures, and compared this information to leading practices for

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[9]We administered two surveys because USAC told us they engaged with both state public utility commissions and health agencies, which had different roles in Lifeline administration and Verifier implementation. In some cases, USAC told us they worked with one agency that fulfilled both of these roles for the state or territory. In these cases, we administered both surveys to the agency and refer to them as a public utility commission or health agency when discussing the results from each survey.

[10]We evaluated FCC's collaborative efforts against all of the seven key collaboration practices we identified in our previous work. GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, GAO-12-1022 (Washington, D.C.: Sep. 27, 2012).

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

[12]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G (Washington, D.C.: September 2014).

performance management regarding performance measures.[13] Additionally, we reviewed information from our stakeholder interviews and the results of our analysis of Verifier performance data and compared this information to internal control standards to assess whether FCC and USAC collected and used quality information about consumer experiences with the Verifier.[14] Further, we identified selected characteristics of leading federal website design that directly relate to a user's ability to access, navigate, and understand a website based on the U.S. Digital Service's *Digital Services Playbook* and U.S. Web Design System's *Design Principles*.[15] We assessed the Verifier's online application and support website against these characteristics. Additionally, we interviewed General Services Administration (GSA) officials responsible for registering government websites. Appendix II contains additional information on our scope and methodology.

We conducted this performance audit from November 2019 to January 2021 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

Lifeline Program

The goal that communication services should be available "so far as possible, to all the people of the United States" was set forth in the Communications Act of 1934.[16] To this end, FCC established four universal service programs, including the Lifeline program, which FCC created in the mid-1980s and which promotes telephone and broadband subscribership among low-income households.

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[13]GAO, *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance Plans*, GAO/GGD-10.1.20 (Washington, D.C.: April 1998).

[14]GAO-14-704G.

[15]U.S. Digital Service, *Digital Services Playbook*, accessed May 21, 2020, https://playbook.cio.gov and U.S. Web Design System, *Design Principles*, accessed May 21, 2020, https://designsystem.digital.gov/design-principles.

[16]Pub. L. No. 73-416, tit. I, § 1, 48 Stat. 1064, 1064 (1934), *codified as amended at* 47 U.S.C. § 151.

Households not located on tribal lands may receive a Lifeline discount of up to $9.25 per month on qualifying phone or internet service based on their participation in one of five qualifying federal assistance programs or if their income is 135 percent or less than the federal poverty level.[17] Qualifying programs include: Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps; Medicaid; Supplemental Security Income (SSI); Federal Public Housing Assistance (FPHA); and Veterans Pension and Survivors Benefit. Historically, nearly 80 percent of Lifeline subscribers qualified based on their participation in Medicaid or SNAP.

Residents of tribal lands may qualify for a discount of up to $34.25 per month and may qualify based on their income, or through participation in one of these five qualifying federal assistance programs or one of four tribal-specific assistance programs: Bureau of Indian Affairs General Assistance; Tribal Head Start if the household met Tribal Head Start's income qualifying standard; Tribal Temporary Assistance for Needy Families; and Food Distribution Program on Indian Reservations.[18] Lifeline subscribers must also meet several other program requirements, such as annually recertifying their continued eligibility, some of which FCC temporarily waived beginning in March 2020 in light of the Coronavirus Disease 2019 (COVID-19).

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[17]For the purposes of this report, we will refer to the programs and the income qualification collectively as "qualifying programs." FCC establishes minimum service standards for Lifeline services. FCC plans to phase out Lifeline support for voice-only services by December 1, 2021 except in areas with only one Lifeline carrier.

[18]For the purposes of the Lifeline program, tribal lands include 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 held in trust for Native Hawaiians by the state of Hawaii pursuant to the Hawaiian Homes Commission Act; and any land designated as tribal lands by the Commission because they maintain the same characteristics as tribal lands. 47 C.F.R. § 54.400(e). Residents of tribal lands qualify for an enhanced tribal benefit if (1) they reside in rural locations and (2) the telecommunications carrier certifies that it will pass through the full enhanced tribal benefit to the resident and that it has received any non-federal regulatory approvals necessary to implement the required rate reduction. 47 C.F.R. § 54.403(a)(3). In 2000, FCC stated that the enhanced tribal benefit was needed due to, among other reasons, low incomes and limited participation in Lifeline on tribal lands. In 2019, a federal appeals court ruled the FCC's regulation limiting the enhanced tribal benefit to rural locations was arbitrary and capricious, vacated the requirement for residency in a rural location, and remanded the issue to the FCC for a new rulemaking. *Nat'l Lifeline Ass'n v. F.C.C.,* 921 F.3d 1102 (2019). As of January 15, 2021, FCC had not initiated a new rulemaking.

While subscribers qualify for Lifeline based on individual need, FCC disburses Lifeline funds directly to carriers. Lifeline carriers offer discounted services to eligible consumers and FCC reimburses the cost of the discounts on a per subscriber basis.[19] Lifeline and other universal services programs are funded by the Universal Service Fund (USF), which is in turn funded by required contributions from carriers.[20] USAC reported that in 2019, FCC authorized more than $8.3 billion in USF support, with about $982 million of that authorized for Lifeline support.

Lifeline subscribership has fluctuated over the past decade and Lifeline has historically had a low participation rate. Subscribership steadily decreased from a high of over 17 million in 2012 to 7.3 million in June 2020. Subscribership has notably decreased in recent years, declining by more than 2.3 million subscribers (24.4 percent) between June 2018 and June 2020, the period during which USAC implemented the Verifier. USAC determined that just 25 percent of the more than 33.2 million eligible households participated in Lifeline in 2020.[21] While FCC officials told us that the Verifier may have some impact on Lifeline subscribership, officials said they believe the decline in subscribership during this period was also due to other rule changes and program integrity initiatives.[22]

Over the past decade, we have identified challenges with FCC's management of Lifeline, including weaknesses for waste, fraud, and abuse. In 2010, we reported that, among other things, Lifeline had limited abilities to detect and prevent ineligible and duplicate subscribers from enrolling in the program.[23] In 2015, we identified challenges households faced accessing and retaining benefits, including lack of awareness of the

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[19]To receive Lifeline support, carriers must be designated as eligible telecommunications carriers by state public utility commissions or FCC. See 47 U.S.C. § 214(e); 47 C.F.R. § 54.201.

[20]The Telecommunications Act of 1996 requires every telecommunications carrier providing interstate telecommunications services to contribute to federal universal service, unless exempted by FCC. Pub. L. No. 104-104, § 101 110 Stat. 56, 73, *codified at* 47 U.S.C. § 254(d). FCC determines the amount of contributions required from carriers each quarter, and carriers generally pass their contribution fees on to their customers in the form of a line item on their monthly telephone bill.

[21]USAC derived the 2020 participation rate from October 2020 Lifeline subscribership data and data in the U.S. Census Bureau's 2019 American Community Survey.

[22]For example, FCC officials cited rules to prevent fraudulent enrollments and efforts to identify and remove ineligible subscribers.

[23]See GAO-11-11.

program and difficulty providing documentation of eligibility.[24] Further, in 2017 we identified program integrity risks, including weaknesses in FCC's oversight of Lifeline carriers and reliance on carriers to perform eligibility verification activities, which we found could lead to waste, fraud, and abuse.[25] In each of these reports, we made recommendations to FCC to improve internal controls in the Lifeline program, and FCC has implemented about half of these recommendations.[26]

FCC issued a series of reforms to modernize Lifeline and strengthen program integrity. For example, in 2012, FCC established a database containing information on all Lifeline subscribers to detect and prevent duplicative support.[27] Four years later, FCC established the Verifier, which includes the Lifeline Eligibility Database and processes for USAC to verify subscribers' eligibility.[28] Finally, in 2019 FCC issued a regulation requiring carriers to register their agents in order to access these databases.[29]

Lifeline National Verifier and Eligibility Verification Processes

Prior to the Verifier, carriers were primarily responsible for verifying the eligibility of potential Lifeline subscribers. To do so, carriers either collected and reviewed documentation of a consumer's identity and participation in a qualifying program or accessed state benefits data, which USAC reported that carriers had access to in approximately 20 states. The Verifier shifts responsibility for eligibility verification from carriers to USAC and seeks to maximize the use of state and federal benefits data, among other data sources. FCC requires that both new

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[24]See GAO-15-335.

[25]See GAO-17-538.

[26]In GAO-11-11, we made five recommendations, including that FCC develop goals and measures, and conduct a risk assessment of the program. We closed four recommendations as implemented, and one recommendation as not implemented. In GAO-15-335, we made one recommendation, that FCC conduct a program evaluation to determine the extent to which the Lifeline program is efficiently and effectively reaching its goals. We reported that this recommendation was not implemented as of November 2020. In GAO-17-538, we made seven recommendations to FCC, including that FCC should facilitate carriers' access to automated data sources for eligibility verification. FCC implemented this recommendation and two others, and we reported that four recommendations remain not implemented as of September 2020.

[27]27 FCC Rcd. 6656, ¶ 179 (2012).

[28]31 FCC Rcd. 3962, ¶ 126 (2016).

[29]34 FCC Rcd. 10886, ¶ 78 (2019).

applicants and, when the Verifier launches in a state and during annual recertification, existing Lifeline subscribers be found eligible through the Verifier before a carrier can enroll them in or continue providing Lifeline service. USAC implemented the Verifier in states between June 2018 and June 2020.

The Verifier includes the Lifeline subscriber and eligibility databases, automated connections to selected state and federal benefits databases, and a set of standardized procedures for USAC to manually review consumers' eligibility when necessary. The Verifier has automated connections to those state and federal benefits databases for which FCC and USAC reached data-sharing agreements with the state or federal owner of the data. These agreements typically lay out data uses, security procedures, and storage practices, among other things.[30] FCC and USAC must reach a data-sharing agreement with state or federal data owners before an automated connection can be established. The Verifier relies on its automated connections to state and federal benefits databases and other automated sources to validate an applicant's identity, address, and participation in qualifying programs. However, when a consumer cannot be automatically verified, the consumer must submit documentation electronically or through the mail to USAC's Lifeline Support Center for manual review.

Consumers may interact with the Verifier (1) directly through the online application or through the mail, or (2) indirectly by obtaining in-person assistance from a carrier or other third party, or applying to the Verifier through a carrier's website.[31] To facilitate assistance from carriers and third parties, USAC developed a separate third party portal for its online application where carriers and other third parties can directly enter application information on behalf of consumers. Carriers and third parties must apply for, and USAC must approve, access to this portal. See table

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[30]FCC and USAC enter into memoranda with state or federal agencies called Computer Matching Agreements (CMA) under section o of the Privacy Act of 1974, as amended; the Federal Information Security Modernization Act of 2014, as amended; and National Institute of Standards and Technology and Office of Management and Budget guidelines.

[31]A consumer may only apply through a carrier's website if the carrier has established an approved automated interface between its website and the Verifier, called an application programming interface (API). USAC introduced carrier eligibility check APIs to the Verifier as an option for carriers in December 2019. With an eligibility check API, a carrier sets up a data-sharing connection between its website and the Verifier, which allows consumers to access the Verifier through the carrier's website. When a consumer uses an API, all actual eligibility verification activities still occur through the Verifier.

1 for more information on how consumers interact with the Verifier, and the automated and manual review processes.

Table 1: Lifeline National Verifier (Verifier) Processes for New Applicants and Existing Subscribers

	Description	Verifier Process
New Applications	Consumers who are not currently enrolled in the Lifeline program apply to have their eligibility verified.	**Automated Review:** A consumer enters their personal information into the Verifier online application independently or through a carrier or third party, or mails a paper application.[a] The Verifier checks the consumer's identity, address, participation in qualifying programs, and current Lifeline subscription status against available databases. If the consumer is automatically approved, they have 90 days to enroll in a qualifying Lifeline service with a carrier.
		Manual Review Process: If the consumer cannot be automatically verified, they must submit supporting documentation to the Universal Service Administrative Company (USAC) for manual review within 45 days. USAC reviews the documentation and renders a decision. If the documentation is insufficient, the consumer has the remainder of the 45 days to submit further documentation before their application expires.
Reverification	Existing Lifeline subscribers undergo a one-time reverification of their eligibility for Lifeline after the Verifier launches in their state.	**Automated Review:** After the Verifier fully launches in their state, the Verifier checks the existing Lifeline subscriber's identity, address, and participation in qualifying programs against available state and federal databases. If the subscriber is automatically reverified, they remain enrolled in Lifeline and no further action is needed.
		Manual Review Process: If the subscriber cannot be automatically reverified, USAC first requests that the subscriber's carrier submit the eligibility documentation it has on file to USAC for manual review within 45 days. If the documentation provided by the carrier is insufficient or not provided on time, USAC contacts the subscriber via mail for supporting documentation, or the carrier chooses to contact the subscriber. If the subscriber submits documentation within 60 days, USAC reviews it and renders a decision. If the documentation is not sufficient or timely, they are de-enrolled and no longer receive Lifeline support.
Recertification	Existing Lifeline subscribers annually recertify that they continue to be eligible for Lifeline.	**Automated Review:** On the existing subscriber's recertification date–which is one year after enrollment or reverification–the Verifier checks the subscriber's eligibility against available state and federal databases. If the subscriber is automatically recertified, they remain enrolled in Lifeline and no further action is needed.
		Self-Certification and Manual Review Process: Until October 2020, if the subscriber could not be automatically recertified, the subscriber could self-certify within 60 days via the Verifier online application, mail, or phone to continue receiving Lifeline support. In 2019, FCC amended the Lifeline program rules to require that existing subscribers whose eligibility was previously confirmed through a state or federal eligibility or income database provide proof of continued eligibility if they could not be verified through available state and federal databases. These changes were effective as of October 13, 2020.[b]

Source: GAO analysis of Federal Communications Commission (FCC) and USAC documents. | GAO-21-235

[a]Consumers may apply with the assistance of a carrier in-person, or through a carrier's website if the carrier has established an interface between its website and the Verifier.

Roles and Responsibilities

Implementation and operation of the Verifier involves participation from carriers; federal, state, and tribal government agencies; and consumer stakeholders. In the 2016 Modernization Order, FCC directed USAC to work with all of these stakeholders to develop and implement the Verifier.

Carriers. Carriers market and provide discounted qualifying services to eligible consumers. Carriers are permitted, but not required, to assist consumers with the Verifier process by working with them in person to enter their information into the third-party portal for the online application and helping them provide supporting documents, or by developing interfaces between their websites and the Verifier's online application.

Federal, state, and tribal government agencies. Agencies that collect and store data on recipients of qualifying benefits programs may enter into data-sharing agreements with FCC and USAC to allow the Verifier to check consumers' participation in these programs. State public utility commissions may also receive and monitor consumer complaints about Lifeline services. Additionally, as of May 2020, FCC granted state agencies access to the Verifier's third-party portal for the online application to directly assist consumers with their Verifier applications.

Consumer groups, service organizations, and consumers. Consumer groups and service organizations, such as homeless shelters, may assist consumers with the Verifier process by helping them enter their information or provide proof of eligibility. Consumers must initiate the application process, provide personal information and proof of eligibility when USAC requests it, and maintain and attest to their compliance with Lifeline rules.

Although the Verifier Is Required Nationwide, the Majority of Lifeline Subscribers Live in States without State Database Connections

As of June 2020, the Verifier was checking new Lifeline applications nationwide, reverification of existing subscribers was substantially completed, and the Verifier had taken over annual recertification for subscribers in 38 states.[32] Starting in June 2018, USAC implemented the Verifier in waves of states referred to as "launches." Within each launch USAC employed a phased approach, giving carriers a 3 to 5 month grace period—known as a "soft launch"—before the Verifier became required after "hard launch."[33] USAC launched the Verifier earlier in states with fewer Lifeline subscribers. About 19 percent of Lifeline subscribers lived in the 27 states where the Verifier was in soft launch between June 2018 and May 2019, while about 81 percent of Lifeline subscribers lived in the 29 states where the Verifier soft launched between June 2019 and December 2019.[34]

While the Verifier had nationwide automated connections to two federal databases, the majority of Lifeline subscribers lived in states without state database connections to the Verifier. The Verifier established an automated connection with the nationwide FPHA database in June 2018 and with the nationwide Medicaid database in September 2019.[35] However, as of November 2020, the Verifier had automated connections to one or more benefits databases in just 20 of the 56 states, and we found that 60 percent of Lifeline subscribers resided in the 36 states in which the Verifier did not have any automated connections to state benefits databases.[36] In these states, consumers who qualify based on

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[32]FCC approved California, Oregon, and Texas to continue their legacy eligibility verification processes in partnership with the Verifier. In these states, verification of consumers' eligibility for Lifeline is generally conducted by a state agency or third-party administrator. See FCC, *Public Notice: Wireline Competition Bureau Announces the Next National Lifeline Eligibility Verifier Launch in Three States* (Washington, D.C.: Dec. 18, 2019). However, broadband-only consumers in California use the Verifier rather than state processes for eligibility verification. Because FCC has oversight of eligibility verification in these states, we consider the Verifier to be implemented in these states. FCC officials told us that as of September 2020, the Verifier had taken over recertification for subscribers in all states except California, Oregon, and Texas.

[33]Consumers did not have access to the online application until hard launch.

[34]Based on Lifeline subscribership as of June 2020.

[35]Federal FPHA data includes data for residents of all states; federal Medicaid data includes data for all states except American Samoa, Guam, and the Northern Mariana Islands.

[36]Based on Lifeline subscribership data as of June 2020. This includes California, Texas, and Oregon. FCC officials told us that Oregon and Texas use state databases in their eligibility verification processes. However, these state databases do not have a connection to the Verifier.

programs other than Medicaid or FPHA cannot be verified automatically and must undergo the manual review process. Figure 1 shows the state benefits databases with automated connections to the Verifier as of November 2020.

Figure 1: Automated Connections between the Lifeline National Verifier and State Benefits Databases as of November 2020
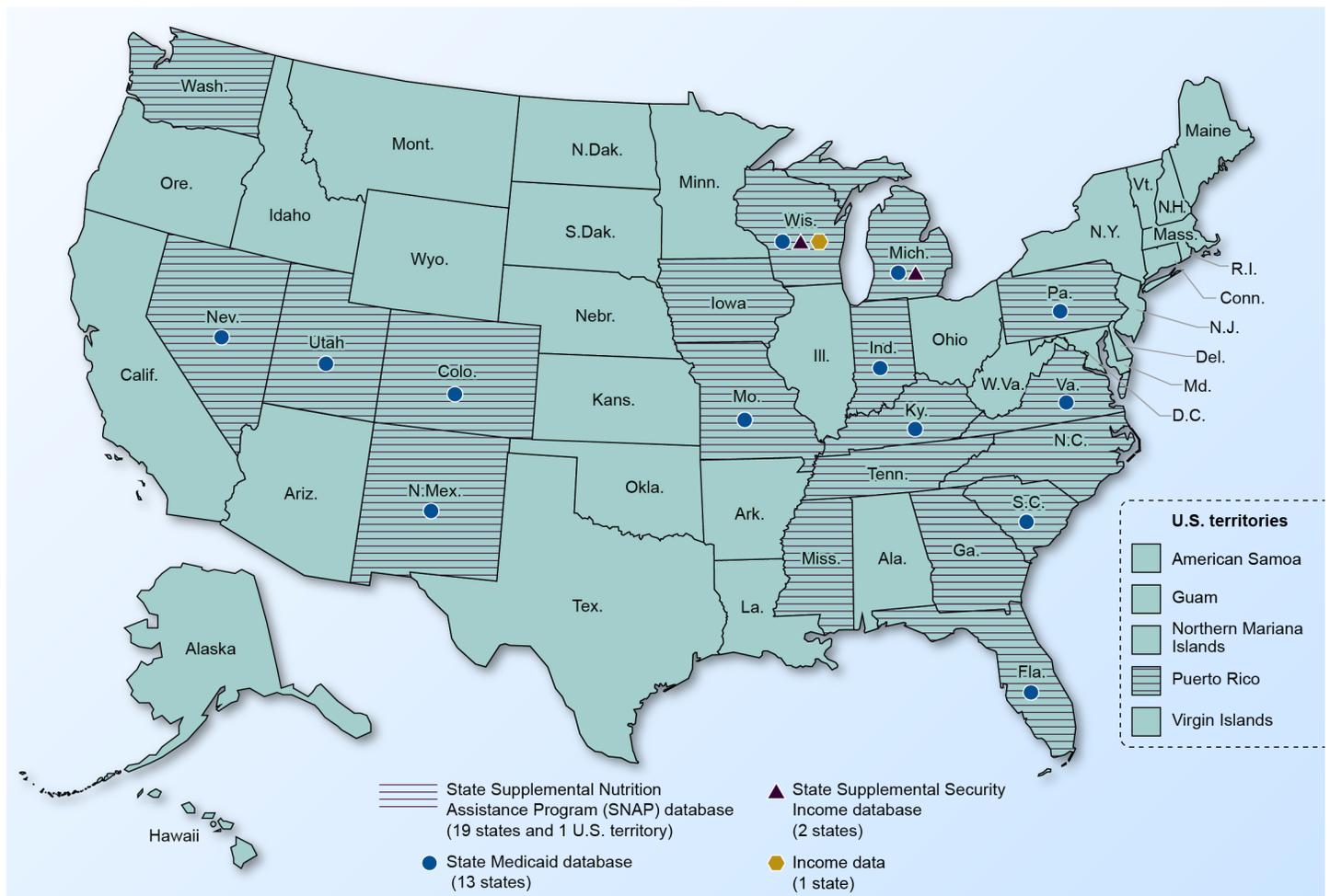
Source: GAO analysis of Federal Communications Commission data and Map Resources. | GAO-21-235

Note: The Lifeline National Verifier (Verifier) has nationwide connections to two federal databases: the Federal Public Housing Assistance database, which covers all states and territories, and the Medicaid database, which covers all states and territories except American Samoa, Guam, and the Northern Mariana Islands. In California, Texas, and Oregon, a third party or state administrator verifies most consumers' eligibility, and according to FCC, Oregon and Texas use state data to do so, but the Verifier does not have a connection to any state data.

Between June 2018 and June 2020, almost 12 million new, reverification, and recertification applications went through the Verifier process nationwide, and the majority of applicants were found eligible for Lifeline. Further, during this time period, almost all of the new and existing subscribers the Verifier found eligible were verified through a state or federal database.[37]

We found that connections between state benefits databases and the Verifier were critical to facilitating these automatic verifications, and the likelihood of a consumer's application requiring manual review varied based on whether a consumer's state had an automated connection to the Verifier. Nearly half of the roughly 2.75 million new applications that were automatically approved through a database nationwide were verified through the 16 state databases with connections to the Verifier at the time of our review. Additionally, less than one-third of new applicants and existing subscribers in these 16 states required manual review.[38] On the other hand, new applicants and existing subscribers from states without such a connection were more likely to be required to submit documentation for manual review to be verified (see fig. 2).[39]

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[37]It is unclear if these outcomes are typical as there are no available federal data on eligibility verification outcomes prior to the Verifier because carriers maintained this information. Because FCC waived some requirements in light of COVID-19, USAC conducted reverification and recertification only through automated checks between mid-March 2020 and June 2020.

[38]There were only 16 active automated state database connections during the period for which we reviewed data.

[39]As of June 2020, California, Oregon, and Texas had not started reverification, and so were not included in the reverification data we analyzed.

Figure 2: Average Percentage of New Lifeline Applications Requiring Manual Review in States with and without State Database Connections to the Lifeline National Verifier from June 2018 through June 2020

With one or more state database connections to the Verifier

30% Manual review

70% Automated databases

Without state database connections to the Verifier

43% Automated databases

57% Manual review

Source: GAO analysis of Federal Communications Commission data. | GAO-21-235

Further, we found that application outcomes varied based on whether a consumer lived in a state with an automated state connection to the Verifier and whether the applicant had to undergo the manual review process. Specifically, we found that new applicants or existing subscribers in states where the Verifier has connections to only federal data sources were less likely to be found eligible for Lifeline than applicants or subscribers in states with one or more state database connections. Yet, we found that consumers in states with and without state database connections had about the same likelihood of actually meeting eligibility requirements.[40] We also found that, nationwide, new and reverification applicants who went through the manual review process were less likely to be found eligible, in particular due to abandoned applications, meaning applicants had not supplied any supporting documentation for manual review as of June 2020.[41] For example, of the more than 1.6 million new applications requiring manual review nationwide between June 2018 and June 2020, just 16 percent were found eligible while 1.1 million new applications (68 percent) were abandoned. More than two-thirds of new applicants and reverification applicants who went through the manual review process abandoned their applications. Given the higher likelihood of manual review in states without state database connections, this high abandonment rate could have contributed to the lower rate of applicants found eligible in these

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[40]Using FCC's estimates of the total number of Lifeline eligible households in each state, which FCC derived based on the Census Bureau's American Community Survey, and the total number of households in each state based on the American Community Survey, we determined the estimated percentage of eligible households in states with state database connections to the Verifier to be about the same as the percentage of eligible households in states without state database connections to the Verifier. Specifically, we found that according to FCC's 2018 estimates and the Census Bureau's 2017 American Community Survey data—the most recent data available at the time of our analysis—33 percent of households in states with state database connections to the Verifier were estimated to be eligible for Lifeline, while 32 percent of households in states without such connections were estimated to be eligible.

[41]It is possible that some abandoned applications had not expired as of June 2020, so some of these applicants could still submit supporting documentation and be found eligible after June 2020. However, as of June 2020, these applicants had not submitted any supporting documentation for manual review. FCC officials noted that applicants may fail to submit documentation for multiple reasons, including limited means to submit documentation or actual ineligibility. Additionally, because FCC waived reverification requirements in March 2020, USAC conducted only automated reverification between April 2020 and June 2020. As a result, FCC considers these applications pending because it is possible that some subscribers whose reverification applications are categorized as abandoned as of June 2020 may submit supporting documents and be found eligible when USAC resumes manual reverification.

states. Figure 3 shows the average percentage of new applicants found eligible in states with and without state database connections.

Figure 3: Average Eligibility Determination Rates for New Lifeline Applicants in States with and without State Database Connections to the Lifeline National Verifier from June 2018 through June 2020
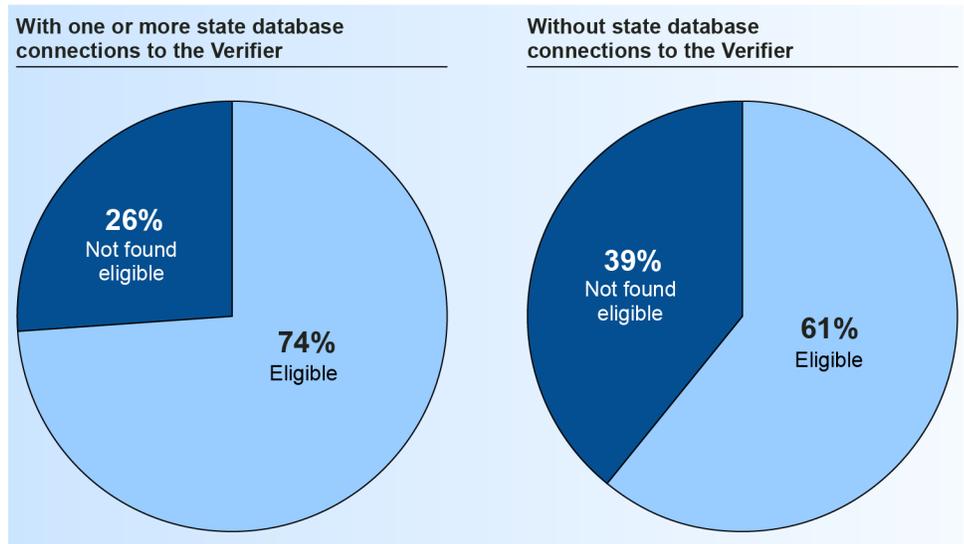
Source: GAO analysis of Federal Communications Commission data. | GAO-21-235

Note: Some applicants who had not been found eligible by the Verifier abandoned their applications, meaning they had not supplied supporting documentation for manual review as of June 2020. This group may include some applications that had not yet expired, meaning applicants still had time to submit supporting documentation. As a result, USAC considers some of these applications pending as it is possible that some applicants that were not found eligible as of June 2020 may still submit supporting documents and be found eligible after June 2020.

FCC Coordinated with a Wide Range of Stakeholders but Did Not Take the Steps Needed to Educate Consumers and Involve Tribal Stakeholders

FCC Coordinated with State and Federal Agencies to Establish Data-Sharing Agreements

We found FCC's and USAC's efforts to establish the data-sharing agreements with state and federal agencies that enable automated database connections generally aligned with leading collaboration practices. USAC officials told us that they have contacted representatives in all states and coordinated with those that were responsive, and 33 of the 45 state health agencies that responded to our survey said that as of May 2020, USAC had contacted them to develop a data-sharing agreement.[42] Additionally, representatives from all seven federal agencies that administer or supervise qualifying programs reported coordinating with USAC to the extent possible. As of November 2020, two federal agencies had established automated database connections with the Verifier. Based on survey responses and USAC documentation of its outreach and coordination with states, we found that FCC and USAC followed all seven leading collaboration practices we identified in our prior work.[43] For example, FCC and USAC publicly reported on the progress of their collaborative efforts, established written data-sharing agreements that clarified all agencies' roles and responsibilities, and established procedures for operating across agency boundaries, among other leading collaboration practices.

Despite FCC's and USAC's efforts to establish data-sharing agreements, USAC and officials from state agencies reported encountering challenges to reaching these agreements and ultimately establishing connections to

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[42]We asked state health agencies whether USAC had contacted them about establishing a data-sharing agreement as of May 1, 2020. FCC told us that USAC prioritized establishing data-sharing agreements with the federal and state data sources that would cover the largest eligible populations, but would work with any state agency interested in establishing a data-sharing agreement.

[43]For a full list of these seven leading practices, see app. II and GAO-12-1022.

the Verifier such as time, privacy and security issues, or statutory requirements. For example, USAC reported that negotiating an agreement typically requires 9 to 12 months of work, so USAC had to prioritize its efforts through cost-benefit analysis. Additionally, 21 of the 45 state health agencies that responded to our survey indicated that among other challenges, the time required to establish a connection to the Verifier posed a challenge (see fig. 4). Some of these challenges are related. For example, one of the state health agencies we spoke to told us that because the multiple entities involved in their agreement had different statutory requirements governing data security, it took over a year for the agencies to negotiate the agreement.

Figure 4: Challenges to Establishing Automated Connections between State Benefits Databases and the Lifeline National Verifier, as Reported by Surveyed State Officials
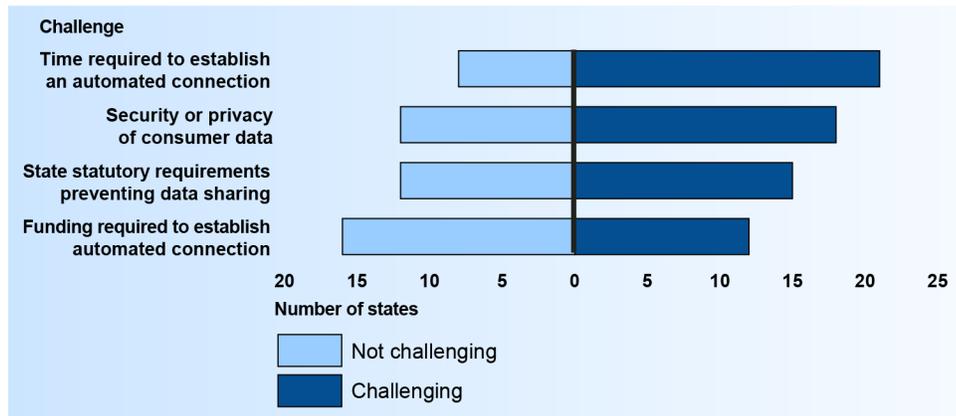
Source: GAO survey of state health agencies. | GAO-21-235

Most of the federal agencies we spoke to also reported challenges achieving automated connections to the Verifier, including statutory and regulatory barriers and competing agency priorities (see table 2).

Table 2: Results and Challenges of the Federal Communications Commission's (FCC) Efforts to Establish Automated Connections between Federal Benefits Data Sources and the Lifeline National Verifier (Verifier)

Lifeline qualifying program	Federal agency	Connection established?	Results and challenges
Medicaid	Centers for Medicare and Medicaid Services (CMS)	Yes	FCC reached an agreement to connect to the CMS Transformed Medicaid Statistical Information System, which includes data on Medicaid recipients in 50 states, two U.S. territories, and the District of Columbia. The connection went live in September 2019. USAC reimburses CMS annually for the development, maintenance, and operation of the connection.
Federal Public Housing Assistance	Department of Housing and Urban Development (HUD)	Yes	FCC reached an agreement to connect to HUD's Inventory Management System/Public and Indian Housing Information Center data system, which includes data on tenants of public housing. The connection went live in June 2018. HUD officials told us that they encountered challenges with delays from FCC that slowed the agreement, but were able to overcome them to ultimately establish a connection.
Supplemental Nutrition Assistance Program (SNAP)	Food and Nutrition Service (FNS)	No	FNS informed FCC that state governments are responsible for collecting and storing SNAP beneficiary data and there is no federal data source on SNAP recipients.
Supplemental Security Income (SSI)	Social Security Administration (SSA)	No	SSA informed FCC that it would require a consumer's full, 9-digit social security number to query their SSI data. However, FCC regulations only require Lifeline applicants to provide the last four digits of their social security number.[a] FCC officials told us they have not considered changing these regulations because of Office of Management and Budget (OMB) guidance regarding the collection of social security numbers.[b]
Veterans Pension Benefit	Department of Veterans Affairs (VA)	No	FCC and VA reached an interconnection security agreement to share data on recipients of the Veterans Pension Benefit program in September 2018. However, due to competing priorities, VA officials told us that VA does not have the capacity to proceed with an agreement or connection. In December 2020, a VA official told us that VA and FCC have discussed FCC's willingness to subsidize VA's costs for the connection, and the two agencies are working to establish a connection in the coming fiscal year. In January 2021, FCC officials told us that as of December 12, 2020, the interconnection security agreement has been rescinded at the request of VA.
General Assistance	Bureau of Indian Affairs (BIA)	No	BIA officials told us that it only collects and retains data for recipients who are members of tribes for which BIA administers General Assistance. Most tribes administer the program themselves and do not provide beneficiary data to BIA. BIA officials said that BIA helped the Universal Service Administrative Company (USAC) contact tribes that administer General Assistance, as well as other qualifying programs, about establishing data-sharing agreements. Officials said BIA must examine the resources needed to establish a data-sharing agreement for the data that it does own, but has not done so due to competing agency priorities.

Lifeline qualifying program	Federal agency	Connection established?	Results and challenges
Income	Internal Revenue Service (IRS)	No	According to IRS officials, IRS informed FCC that the release of taxpayer information for Lifeline eligibility verification would require an amendment to section 6103 of the Internal Revenue Code.[c] IRS and FCC officials said they discussed a potential process that would allow consumers to consent to sharing their taxpayer information with USAC, but IRS officials told us they cannot compel individuals to waive their right to privacy to obtain Lifeline benefits without such an amendment.

Source: GAO interviews with FCC, USAC, CMS, FNS, HUD, SSA, VA, BIA and IRS officials and GAO analysis of FCC documents. | GAO-21-235

Note: FCC is the signatory on all data-sharing agreements. However, USAC, which manages the Verifier, conducted most of the interagency coordination and is also party to almost all of the agreements.

[a]47 C.F.R. § 54.410(d)(2)(vi).

[b]OMB Circular No. A-130. The Circular directs agencies to eliminate unnecessary collection, maintenance, and use of social security numbers. According to FCC officials, FCC interprets this OMB guidance to mean agencies should limit the collection of social security numbers.

[c]26 U.S.C. § 6103. This statute prohibits officers and employees of the United States from disclosing a taxpayer's returns or information on the return unless disclosure is authorized by the statute. The statute provides for disclosure with consent of the taxpayer.

FCC has taken steps to address the challenges it has encountered establishing data-sharing agreements with federal agencies, but FCC officials told us that in several cases, further action was not feasible. For example, although FCC has continuously worked to identify a consent-based approach for accessing taxpayer data, Internal Revenue Service (IRS) officials said that they would not grant FCC access without a statutory change to the Internal Revenue Code. FCC officials told us that they have not sought such a change because the costs of amending the law and implementing associated requirements for data security and storage would outweigh the benefits. For instance, historically only 3 percent of consumers qualified for Lifeline by providing documentation of their income, and less than 2 percent qualified based on income since the Verifier's implementation. While FCC officials told us that up to 69 percent of eligible consumers could qualify based on income, IRS officials told us that many low-income families are not required to file tax returns, so it is unclear how helpful taxpayer data would be for verifying Lifeline eligibility. Similarly, about 3 percent of consumers historically qualified for Lifeline through participation in SSI, and FCC officials told us that, at most, up to 11 percent of eligible consumers could qualify based on participation in this program. These circumstances would limit the potential benefit of revising existing regulations to enable a connection to the SSI database.

In light of these considerations, FCC officials told us that they have prioritized establishing data-sharing agreements with the federal and

state entities that will enable the Verifier to verify the largest number of eligible consumers the soonest. For instance, as previously noted, nearly 80 percent of consumers have historically qualified through their participation in Medicaid or SNAP. Thus, FCC officials told us that they prioritized establishing data-sharing agreements with the Centers for Medicare and Medicaid Services as well as state agencies that administer SNAP and have indicated a willingness to share data with the Verifier.

USAC has reported that, in addition to technical challenges, statutory limitations, and cost, its ability to establish data-sharing agreements with state agencies is limited by those agencies' interest in establishing a connection and prioritization of the necessary work. USAC continues to work with state agencies to establish data-sharing agreements and USAC officials anticipate that they will ultimately establish connections with 30 states. As of October 2020, FCC officials told us that they were in active discussions with six states to reach an agreement and were hopeful that these discussions would result in database connections in 2021.

FCC Has Taken Some Steps to Educate Eligible Consumers about the Verifier but Has Not Followed Key Practices for Consumer Education Planning

Under FCC's oversight, USAC has made some efforts to provide materials on the Verifier and the Lifeline program to stakeholders to meet its obligation to educate consumers.[44] For instance, USAC:

- Developed educational materials designed for stakeholders who help consumers navigate the online application and made them available on its website, including webinars and fact sheets that stakeholders can provide to potentially eligible individuals.

- Sent informational materials to service organizations, such as food banks and homeless shelters, in May 2020, including a plain-language guide on applying for Lifeline through the Verifier. USAC officials told us that USAC sent these materials to 14,000 service organizations, intending for the organizations to print and make these resources available to the people the organizations serve.

- Provided educational materials to Lifeline carriers because the carriers directly interact with current and prospective Lifeline subscribers.

- Coordinated with some federal agencies and state public utility commissions to raise awareness of Lifeline among people who have recently become eligible due to COVID-19. FCC told us FCC and USAC officials presented information on Lifeline to federal agency

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[44]USAC officials told us that as the Lifeline program administrator, USAC is responsible for educating consumers on the Verifier and the Lifeline program.

officials and directed them to USAC's online materials, and sent a letter to state public utility commissions.

Despite USAC's efforts, public awareness of Lifeline, which we have found to be a long-standing difficulty for the program in our prior work, remains a challenge.[45] Many state, industry, consumer advocate, and service organization stakeholders told us that many current and potential Lifeline subscribers are not aware of the Verifier process or the Lifeline program more generally, including USAC's role. Specifically, 24 of the state public utility commissions we surveyed responded that consumers' lack of awareness of the Lifeline program was a challenge affecting their ability to apply for Lifeline support.[46] Similarly, all five consumer advocates and service organizations we interviewed told us that consumers were unfamiliar with Lifeline, USAC, or how to access the Verifier. For instance, both of the service organizations we spoke with explained that while the people they serve were sometimes aware that discounted or free phone service is available, few knew about the Lifeline program by name or how to enroll. Furthermore, all of the seven carriers we spoke with told us that lack of awareness of the Verifier or USAC could affect consumers' ability to get or retain Lifeline, or stated that additional USAC consumer education efforts would be helpful.

USAC has not developed a comprehensive plan to educate consumers, which may have contributed to consumers' lack of awareness of Lifeline and the Verifier. We reviewed USAC's consumer education efforts and its communications working plan for 2020, which USAC officials told us serves as its consumer education plan, and found USAC had not planned a coordinated effort to fulfill its responsibility to educate consumers about Lifeline and the Verifier. In our prior work, we determined that agencies should have a plan for consumer education campaigns to help them overcome challenges that may emerge and identified nine key practices for such planning.[47]

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[45]In 2015 we reported that eligible households may be unaware of the program, which may have contributed to low Lifeline participation rates. At the time of our reporting in 2015, education about Lifeline was the sole responsibility of carriers. See GAO-15-335. However, USAC officials told us that USAC is responsible for educating consumers about the Verifier, which USAC began implementing in 2018.

[46]Of the remaining 26 state public utility commissions we surveyed, six responded that consumers' awareness of the Lifeline program was not challenging, 14 responded that they did not know, and six responded that it was not applicable.

[47]GAO-08-43.

We compared USAC's consumer education plan with these nine key practices and found that it did not always align with them, as shown in table 3. In particular, USAC's consumer education plan does not define goals or objectives that USAC should achieve to fulfill its consumer education responsibility, nor does it establish metrics to track USAC's progress in educating consumers. USAC officials acknowledged that their communications plan does not meet these nine key practices but stated that they believe the consumer education efforts they have undertaken do align with some of these key practices. While these efforts are positive steps, USAC has not integrated them in a comprehensive planning effort that would prepare USAC to address challenges to raising consumer awareness.

Table 3: Universal Service Administrative Company's (USAC) Planning Compared to Key Practices for Consumer Education Planning

Key practice	Description of key practice	GAO evaluation of USAC's consumer education planning
Define goals and objectives	Define the goals of the communications campaign, e.g., to increase awareness or motivate a change in behavior. Define the objectives that will help the campaign meet those goals.	*Does not align.* USAC's consumer education plan does not define goals or objectives. USAC officials told us that USAC has an overall goal of providing the necessary training and user support to Lifeline stakeholders, but acknowledged their consumer education plan does not demonstrate how USAC designs its activities to meet these goals.
Analyze the situation	Analyze the situation, including any competing voices or messages, related market conditions, and key dates or timing constraints. Review relevant past experiences and examples to identify applicable "lessons learned" that may help to guide efforts.	*Somewhat aligns.* USAC's consumer education plan lists key dates for Lifeline program changes, such as Verifier launch dates. However, the plan does not analyze Lifeline market conditions or identify applicable lessons learned to guide USAC's efforts.
Identify stakeholders	Identify and engage all the key stakeholders that will be involved in communications efforts. Clarify the roles and responsibilities of each stakeholder, including which entity or entities will lead overall efforts.	*Somewhat aligns.* USAC has identified and engaged with a number of key stakeholders, including carriers, service organizations, and state agencies. USAC officials told us that these stakeholders are typically familiar with their roles and responsibilities, but USAC's consumer education plan does not describe the roles and responsibilities of these stakeholders with regard to educating consumers. Further, several stakeholders told us they were unsure of their exact roles and responsibilities for educating consumers.
Identify resources	Identify available short- and long-term budgetary and other resources.	*Does not align.* USAC's consumer education plan does not identify available budgetary resources.

Key practice	Description of key practice	GAO evaluation of USAC's consumer education planning
Research target audiences	Conduct audience research, such as dividing the audience into smaller groups of people who have relevant needs, preferences and characteristics, as well as measuring audience awareness, beliefs, competing behaviors, and motivators. Also, identify any potential audience-specific obstacles, such as access to information.	*Does not align.* USAC has not conducted audience research that identifies relevant audience needs or measures audience awareness, nor does its consumer education plan identify any audience-specific obstacles that USAC must overcome. USAC officials told us that they have received feedback from consumer stakeholders, but acknowledged that this may not constitute audience research as described by this key practice.
Develop consistent, clear messages	Determine what messages to develop based on budget, goals, and audience research findings. Develop clear and consistent audience messages; test and refine them.	*Does not align.* USAC officials told us that they consider resources when determining what education activities to conduct. However, USAC's plan does not demonstrate any connection between its budget, goals, and messages, nor has it conducted audience research to inform its messages.
Identify credible messenger(s)	Identify who will be delivering the messages and ensure that the source is credible with audiences.	*Somewhat aligns.* USAC relies on carriers, who consumers likely see as credible sources for information about their phone service, for much of its consumer education effort. However, USAC did not provide any examples of research it has done to show how any particular messengers would be credible to specific segments of USAC's target audience.
Design media mix	Plan the media mix to optimize earned media (such as news stories or opinion editorials) and paid media (such as broadcast, print, or Internet advertising). Identify through which methods (e.g., advertising in newsprint ads), how often (e.g., weekly or monthly) and over what duration (e.g., 1 year) messages will reach audiences.	*Somewhat aligns.* USAC publishes regular webinars and newsletters but has not used earned or paid media to educate consumers on Lifeline or the Verifier. Without consumer education planning that analyzes goals, objectives, and available resources, USAC cannot optimize a media mix. For example, many of USAC's educational materials are online, which may be difficult to access for consumers seeking affordable telecommunications service.
Establish metrics to measure success	Establish both process and outcome metrics to measure success in achieving objectives of the outreach campaign. Process metrics assure the quality, quantity, and timeliness of the contractor's work. Outcome metrics evaluate how well the campaign influenced the attitudes and behaviors of the target audience(s) that it set out to influence.	*Does not align.* USAC's consumer education plan does not establish metrics to measure success. Further, USAC told us it has no way of evaluating the success of its informational mailing to service organizations.

Source: GAO analysis of GAO-08-43 and Federal Communications Commission (FCC) and USAC information. | GAO-21-235

Note: Aligns indicates that FCC and USAC provided evidence that USAC's planning satisfied all of the key practice, somewhat aligns indicates that FCC and USAC provided evidence that USAC's planning satisfied some of the key practice, and does not align indicates that FCC and USAC provided no evidence that USAC's planning satisfied the key practice.

Absent a concerted consumer education planning effort that incorporates these key practices, awareness of Lifeline and the Verifier is likely to remain low, which could make it difficult for consumers to access or continue accessing Lifeline support. For example, four of the carriers we interviewed told us that a lack of familiarity with USAC and its role in eligibility verification could cause existing subscribers to ignore important

communications from USAC about annual recertification requirements and ultimately lead to them to being de-enrolled. Additionally, in the 2016 Modernization Order, FCC stated that it expected that the Verifier would allow consumers to initiate their own applications and enable third-party organizations other than carriers to assist consumers in navigating the Verifier, but USAC's lack of comprehensive consumer education planning may have contributed to consumers continuing to rely on carriers.[48] From June 2018 through June 2020, 73 percent of new applicants applied to the Verifier with the assistance of a carrier, either in person or through a carrier's website. FCC officials told us that they are comfortable with consumers' reliance on carriers for assistance with the Verifier given that consumers have the option to apply through the Verifier on their own as well.

Developing and implementing a comprehensive consumer education plan that aligns with key practices would guide USAC's efforts, helping it leverage third-party organizations, such as service organizations, who could reach and educate eligible populations that carriers currently do not. By doing so, USAC could enable more eligible consumers to enroll in Lifeline by applying on their own or with third-party assistance as FCC envisioned in the 2016 Modernization Order.

Residents of Tribal Lands Rely on Tribal Governments and Organizations for Assistance, but These Organizations Lack Quality Information from FCC to Support Their Efforts

Residents of tribal lands often rely on tribal governments and organizations rather than USAC to provide them with information on Lifeline and how to access it through the Verifier. Six of the 11 tribal stakeholders we spoke to told us that tribal organizations are fitting stakeholders to educate tribal consumers and assist with eligibility verification because they are trusted within the community, among other things. For example, a representative of one tribally owned carrier told us that their tribal customers are accustomed to approaching the carrier's front office employee with questions about the Verifier because that employee is a well-known figure in the community. Five of the tribal stakeholders we spoke to told us that residents of tribal lands are rarely familiar with USAC, and according to one stakeholder, long-standing distrust of federal agencies or nontribal entities might cause residents of tribal lands to discard important information from USAC about their eligibility.

Most tribal stakeholders also told us that outreach and assistance from tribal governments and organizations is more likely to succeed than

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[48]See 31 FCC Rcd. 3962, ¶ 131 (2016).

efforts from outside entities, such as USAC, because they (1) promote Lifeline through venues that are visible to tribal members and are culturally sensitive, and (2) because they interact directly with tribal members when providing services. For example, all three tribally owned carriers told us they promote Lifeline through a variety of venues that are visible and easily accessible to tribal members, such as festivals, radio shows, and, in one case, a weekly online tech support show. Additionally, seven of the 11 tribal stakeholders we spoke with told us that tribal governments and organizations provide information to consumers in a culturally sensitive manner that outside organizations cannot. For example, one tribal telecommunications organization told us that elderly consumers on reservations in the region were raised in boarding schools where they were punished for asking questions. Because of this history, it would not be uncommon for an elder to leave a carrier's store without applying for Lifeline rather than asking questions. Tribal organizations who are aware of this cultural norm are better positioned to ensure that potential applicants get all the information they need to successfully enroll and stay enrolled in Lifeline.

FCC and USAC have taken some steps to share information about the Verifier with tribal governments and organizations. In July 2015, FCC sent an email to a list of 150 tribes and tribal leaders that it obtained from the Bureau of Indian Affairs alerting them to the proposed rulemaking and met with a number of tribes to discuss the rulemaking's provisions, including the Verifier.[49] Since launching the Verifier in June 2018, USAC has hosted webinars for tribal stakeholders and presented information on the Verifier at five national and regional meetings of tribal associations and organizations. In September 2020, USAC also released a toolkit for tribal organizations with templates for organizations to distribute information about Lifeline through channels such as blogs, radio announcements, and social media posts.

Nevertheless, the tribal stakeholders we spoke with had varying degrees of awareness of Lifeline, the Verifier, and the extent to which tribal governments and organizations could assist residents of tribal lands with the Verifier. For example, one tribal government official stated that tribal offices that administered qualifying programs on the reservation

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[49]In 2015, there were 566 federally recognized tribes. We previously found that, while FCC is not subject to Executive Order 13175 on tribal consultation, it voluntarily complies with the executive order and has its own tribal consultation policy. GAO, *Tribal Consultation: Additional Federal Actions Needed for Infrastructure Projects*, GAO-19-22 (Washington, D.C.: Mar. 20, 2019).

previously helped tribal members fill out Lifeline applications. However, based on information in USAC training workshops, the tribal government's understanding was that recent changes to Lifeline rules prohibited them from rendering this type of assistance. In contrast, another tribal telecommunications organization told us that it was in the process of training tribal government representatives to help members fill out Verifier applications at a community center and were unaware of any Lifeline rules that would prohibit such assistance.

When we asked USAC to clarify whether third parties were permitted to help consumers use the Verifier, officials told us that such assistance is permitted so long as the consumer is present and chooses to ask the entity for help. However, in reviewing the resources for tribal stakeholders that USAC published on its Lifeline support website, we found that none of the resources clarified whether third parties such as tribal governments and organizations could help consumers use the Verifier. Further, one tribally owned carrier told us that even after hiring a Washington, D.C. law firm to assist with Lifeline compliance, it remained unclear whether its staff could scan and upload eligibility documentation to the Verifier on a consumer's behalf.

In the 2016 Modernization Order, FCC stated that the Verifier would facilitate the participation of third-party organizations other than carriers to assist consumers in applying for Lifeline and specifically noted that USAC should consider collaborating with tribes to more efficiently determine consumer eligibility.[50] Federal internal control standards further state that agencies should communicate quality information to external parties to help the agency achieve its objectives.[51] While USAC has developed informational materials specifically for tribes, these materials are nearly identical to the materials USAC distributes to other stakeholders and lack important information specific to situations on tribal lands. Seven of the 11 tribal stakeholders we spoke with told us that the information they received from USAC did not meet their needs because, among other things, it did not clarify the extent to which tribal governments and organizations can assist residents of tribal lands with applications. For example, two tribal stakeholders told us that as administrators of qualifying tribal programs, they were in a position to conduct consumer education or assist with the Verifier process, but neither stakeholder had

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[50]See 31 FCC Rcd. 3962, ¶¶ 131, 135 (2016).

[51]GAO-14-704G.

received information from FCC or USAC about the extent to which they could do so.

FCC also has not provided tribal governments with access to the third-party portal of the Verifier's online application. In the 2016 Modernization Order, FCC stated its expectation that state and tribal governments would be able to directly access the Verifier to establish or verify their citizens' eligibility.[52] FCC began granting state government agencies access to the third-party portal of the Verifier's online application to assist state residents with their applications in May 2020. This allowed registered state agency officials to help consumers verify their eligibility in the same way as carriers. FCC has not extended this access to tribal governments. FCC officials told us they are exploring options to do so but did not provide a timeline to grant such access.

Without improved information from FCC or access to the Verifier, tribal governments and organizations may be unable to effectively assist tribal members with their applications and cannot access information on the status of tribal members' applications. Empowering tribal governments and organizations in this way could help address low Lifeline subscribership on tribal lands, where access to affordable telecommunications services has been a long-standing challenge. Between June 2018, when USAC implemented the Verifier, and June 2020, tribal Lifeline subscribership fell by more than 21,000 subscribers (about 9 percent), decreasing in 30 of the 31 states with tribal subscribers. In about a third of these states, tribal subscribership decreased by 50 percent or more during this period.[53] Without improving the quality of the information and tools FCC provides to tribal governments and organizations, these organizations will be limited in their ability to provide much-needed assistance and guidance to residents of tribal lands and to fulfill the role envisioned for them in the 2016 Modernization Order.

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[52]31 FCC Rcd. 3962, ¶ 138 (2016).

[53]As previously discussed, FCC attributes changes in subscribership to multiple causes.

FCC Reports Progress toward Achieving the Verifier's Goals but Lacks Measures and Information to Track All Goals

FCC Designed the Verifier to Address Fraud Risks and Monitors Waste, Fraud, and Abuse

Lifeline National Verifier Goals

1. Protect against and reduce waste, fraud, and abuse.
2. Reduce costs to the Universal Service Fund and eligible telecommunications carriers.
3. Improve the consumer experience and facilitate consumer choice.

Source: Federal Communications Commission. | GAO-21-235

FCC designed the Verifier to address program integrity weaknesses, including fraud, by giving responsibility for eligibility verification to an independent third party—USAC—and using automated connections to state and federal data sources to reduce reliance on human decision-making, a potential vulnerability. In its Lifeline National Verifier Plans, USAC identified four program integrity risks related to eligibility verification processes before the Verifier and identified how the Verifier's design mitigates those risks (see table 4).

Table 4: Lifeline National Verifier (Verifier) Program Integrity Risk Mitigation Strategies

Program Integrity Risk Pre- Verifier	Verifier Mitigation Strategy
Lifeline Eligible Telecommunications Carriers (carriers) conducting eligibility verification creates potential for waste, fraud, and abuse.	The Verifier centralizes eligibility verification with the Universal Service Administrative Company (USAC), a neutral party.
Variation in eligibility verification processes across carriers and states creates the potential for confusion, errors, and inconsistency.	The Verifier standardizes eligibility processes nationwide, including increased automated verification through state and federal data sources and centralized manual reviews with quality control standards.
Subscribers whose eligibility has lapsed may not be de-enrolled in a timely manner.	The Verifier automates both recertification to re-confirm eligibility and the de-enrollment of subscribers that are not successfully recertified through an automated database check or self-certification.[a]
Separate processes for carriers to enroll subscribers and submit claims for reimbursement creates complexity.	Unified enrollment databases tie reimbursements provided to carriers directly to the subscribers carriers have enrolled.

Source: USAC Lifeline National Verifier Plans. | GAO-21-235

[a]In 2019, the Federal Communications Commission (FCC) amended the Lifeline program rules for recertification to require that existing subscribers whose eligibility was previously confirmed through a state or federal eligibility or income database provide proof of continued eligibility if their continued

eligibility could no longer be verified through available state and federal databases. See Federal Communications Commission, *Lifeline and Link Up Reform and Modernization, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 34 FCC Rcd. 10886, ¶ 96 (2019). These changes were effective as of October 13, 2020, but due to FCC's temporary waivers of the recertification requirements in light of the Coronavirus Disease 2019, USAC will not conduct outreach to subscribers who fail automated recertification checks until the waivers expire.

FCC and USAC have implemented other processes intended to improve program integrity as well. For instance, starting in May 2020, FCC began requiring that carrier sales agent identification numbers be attached to every application agents assist with and submit through the Verifier.[54] USAC monitors these data for trends that might suggest fraudulent activity, such as an unusual number of applications submitted from one agent with the same qualifying program. Based on the Verifier's design and processes, USAC has reported that the Verifier is meeting its goal to protect against waste, fraud, and abuse.[55]

In addition to controls meant to prevent waste, fraud, and abuse, USAC also reports that it has developed and used routine and one-time procedures to detect potential fraudulent activity. For example, while the Verifier prevents the enrollment of a deceased subscriber by cross-checking all applicants with the Social Security Death Master File, USAC reviews a statistically significant sample of existing subscribers on a quarterly basis to ensure they have not died after their enrollment. USAC implemented these routine sampling procedures to monitor trends in four key risk areas.[56] FCC and USAC officials also told us that USAC has begun a risk assessment to identify potential risks to Lifeline program integrity that require additional attention, which they expect to be complete in early 2021.

FCC and USAC officials told us that USAC also tracks a number of Verifier performance measures to monitor the Verifier's performance in preventing and reducing fraud on a regular basis such as: the percentage of Verifier applications completed without manual review; recertification rates, including automated versus manual recertification; and trends in enrollment activity, and shares this data with FCC. FCC also reports the improper payment rate each fiscal year. In 2019, FCC reported that the

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[54]47 C.F.R. § 54.406(a)(1).

[55]USAC, *National Verifier Annual Report and Data* (Washington, D.C.: Jan. 31, 2020).

[56]USAC conducts routine sampling and monitoring for ineligible subscribers, oversubscribed addresses, unclaimed subscribers, and deceased subscribers.

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improper payment rate for fiscal year 2019 was 9.3 percent, a decrease from the reported fiscal year 2018 rate of 18.5 percent.[57]

At the time of our review, it was too soon to determine how well the Verifier had reduced fraud in the Lifeline program. Just over 60 percent of Lifeline subscribers lived in states in which the Verifier was not required until January 2020 or later. Moreover, FCC's temporary waiver of rules regarding reverification, recertification, and de-enrollments beginning in March 2020 in response to COVID-19 mean that it is possible that some subscribers who no longer met eligibility requirements remained enrolled in Lifeline. While FCC determined that such measures were necessary to ensure that Lifeline support was and remained available to those in need during the public health crisis, the measures will likely complicate efforts to determine the effect the Verifier has had on fraud in the Lifeline program during the period of time they were in place.[58]

FCC Lacks Measures to Assess the Verifier's Progress in Delivering Value to Consumers

FCC intends for the Verifier to reduce costs to both the USF and Lifeline carriers in order to deliver more value to consumers. In the 2016 Modernization Order, FCC explained that by reducing carrier compliance costs, the Lifeline program will benefit from greater competition with the ultimate outcome of delivering more value to Lifeline consumers.[59] According to one FCC official, in FCC's view, delivering more value to Lifeline consumers means they will have more carriers to choose from and increased access to modern, high-quality services.

While USAC reports that it is meeting its goal to reduce costs, it does not track the Verifier's progress in delivering value to consumers because it has not identified performance measures to do so. According to leading practices for performance management, agencies should identify performance measures that have a clear relationship to the ultimate desired outcomes of a program, and such measures should capture key

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[57]We did not independently verify the validity or accuracy of the improper payment rate FCC reported. FCC reported that the margin of error for the fiscal year 2018 rate was ±1.25 percent, and the margin of error for the fiscal year 2019 rate was ±1.07 percent. FCC also reported that the actual fiscal year 2019 improper payment rate may be higher than reported as FCC became aware of additional instances of non-compliance during the fiscal year.

[58]As of November 2020, FCC has extended the waiver of the rules through February 2021. *Lifeline and Link Up Reform Modernization,* WC Docket No. 11-42, Order, DA 20-1357 (WCB Nov. 16, 2020).

[59]31 FCC Rcd. 3962, ¶ 130 (2016).

aspects of those outcomes.[60] USAC has identified four performance measures for the Verifier's goal of reducing costs in order to deliver more value to Lifeline consumers, including the percentage of enrollments requiring manual review, repeat cases, processing time, and actual versus projected volumes.

In FCC's comments on a draft of this report, FCC officials stated that they believe these measures provide FCC with insight into consumer value because they measure the ease with which consumers can access Lifeline services. However, the goal FCC identified in the 2016 Modernization Order—"by reducing compliance costs and burdens and attracting more Lifeline providers, the program will benefit from greater competition and, as a result, deliver more value to subscribers"—does not relate to increased or easier access to Lifeline services.[61] FCC officials did not provide us with any additional information to demonstrate that FCC has performance measures for the Verifier that measure carrier costs, competition, and the resulting value to subscribers as described in the 2016 Modernization Order.

Additionally, in September 2020, FCC officials acknowledged that they do not have measures to track value to consumers. Officials explained that they are awaiting the results of a Lifeline program evaluation, expected in December 2020, which they anticipate will contain measures that capture this information.[62] However, FCC officials said it was too soon to tell what measures will be included in that evaluation and how FCC will use them.

Because it has not identified and used performance measures related to the ultimate outcome of delivering value to consumers, FCC lacks the tools and information it needs to monitor the Verifier's progress toward its intended outcome. Without this information, FCC will be limited in its ability to make adjustments and improvements to the Verifier to meet its goal of delivering more value to consumers.

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[60]GAO/GGD-10.1.20.

[61]31 FCC Rcd. 3962, ¶ 130 (2016).

[62]In January 2021, FCC officials told us that USAC has provided the evaluation findings to FCC for review on December 28, 2020, and that FCC would incorporate the results, as appropriate, into its State of the Lifeline Marketplace Report in June 2021.

FCC Lacks Information on the Manual Review Process and the Online Application Does Not Fully Align with Selected Leading Website Design Characteristics

In the 2016 Modernization Order, FCC noted that the eligibility verification process prior to the Verifier placed significant limitations on the choices of eligible subscribers due to its reliance on carriers, and that the Verifier should facilitate consumer choice and improve the consumer experience.[63] In January 2020, USAC reported that the Verifier facilitates consumer choice by providing a dedicated online application for consumers so that they can apply for the Lifeline program without needing to apply through a carrier. FCC officials told us they are continually enhancing the process for consumers based on, among other things, feedback from stakeholders. USAC also reported that the Verifier is meeting its goal of improving the consumer experience through the design of the Verifier system and the administration of related processes, including automated access to state and federal data sources. However, while the Verifier process is fast and easy for consumers who are verified through automated database connections, we found consumers may face challenges (1) participating in the manual review process, (2) using the Verifier's online application, and (3) identifying the Verifier's online application as a government website.

Consumer Challenges with the Manual Review Process

Although USAC reported that the Verifier has improved the consumer experience, we found that USAC does not collect or use information on applicants' experience with the manual review process which in many states, USAC has relied on to check the eligibility of more than half of applicants. To assess the Verifier's performance in improving the consumer experience, USAC monitors the frequency of manual review, repeat cases, and processing time, which includes the length of time USAC takes to manually review applications after receiving documentation. Of these, only processing time is related to the manual review process, and it provides insight into just one part of the process. USAC officials told us that they also review samples from customer service calls to the Lifeline Support Center and seek information from state public utility commissions and consumer organizations on consumer complaints. Though these efforts to gather information are a step in the right direction, they depend on applicants reaching out with concerns.

While USAC does not collect information on applicants' experience with the manual review process, we found that some consumers may face challenges with this process. Almost all the industry, consumer, and tribal

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[63]See 31 FCC Rcd. 3962, ¶ 131 (2016). We also previously reported that some consumers encountered difficulties with the eligibility verification process prior to the Verifier, including inconsistent information provided by carriers and difficulty accessing and submitting applications and documentation. See GAO-17-538 and GAO-15-335.

stakeholders we spoke to identified challenges with the manual review process, a couple of which are long-standing challenges that consumers faced before the Verifier was implemented. Stakeholders we spoke to identified the following challenges, some of which are related.

- **The manual review process is time-consuming or complicated.** Most stakeholders told us that the manual review process either or both takes too long and is complex due to, among other things, additional steps and back-and-forth between USAC and consumers. For instance, one tribally owned carrier told us that resolving issues with an individual's application with USAC, such as correcting scanned or photocopied documents that are rendered illegible, requires multiple return trips to the carrier's office. Stakeholders said, for example, that most eligible individuals need help with the process because of its complexity and that some may wait months for approval. USAC officials reported that in June 2020 USAC was able to perform real-time manual reviews in 5 minutes on average during business hours. However, as noted above, this performance measure only reflects the time it takes for USAC to review documents and does not reflect time spent for any back-and-forth between USAC and the consumer, or the time it takes for consumers to obtain and submit documents to USAC, which as described below, stakeholders also said was a challenge.

- **Obtaining documents to prove addresses or eligibility is difficult and burdensome.** About half of stakeholders identified challenges applicants face proving their physical address when it cannot be automatically verified, such as nonstandard addressing in rural areas. USAC has taken steps to resolve address challenges, but some stakeholders told us that USAC's solution still presents difficulty for consumers.[64] Additionally, about half of stakeholders told us that it is difficult for eligible populations to obtain the correct eligibility documents to submit to USAC when their participation in a qualifying program cannot be automatically verified, a challenge we found consumers faced prior to the Verifier as well.[65] For example, USAC stopped accepting most SNAP cards as proof of participation in SNAP unless certain criteria are met, but some stakeholders told us that few

[64]USAC accepts descriptive addresses and introduced a mapping tool to the online application that applicants can use to show their physical location. However, some stakeholders noted that eligible consumers have difficulty using the map.

[65]See GAO-15-335.

SNAP beneficiaries retain or have easy access to other documentation to prove their participation in SNAP.[66]

- **Lack of access to the internet and connected devices, or limited digital literacy.** About half of stakeholders said that eligible individuals are less likely to have access to the internet or devices they need to apply for Lifeline through the Verifier such as smartphones, computers, printers, or scanners, which we also identified as a challenge prior to the Verifier.[67] Moreover, about half of stakeholders reported that many eligible individuals do not have the level of digital skill needed to successfully complete the manual review process, such as knowing how to scan or upload documents. While USAC offers a paper application option, we found that this option still requires consumers to have access to a printer or copier in order to send supporting documents for manual review.

Further, about half of the stakeholders we spoke to told us that these challenges are amplified for residents of tribal lands due to factors such as rough terrain, dispersed locations, and lack of access to the internet or reliable transportation on many reservations. Representatives from one tribally owned carrier told us that some customers go without service for a couple of months before they can get to the carrier's office for assistance with their Verifier application, which can be up to 150 miles round trip.

We also found that the challenges applicants face navigating the Verifier process were exacerbated during COVID-19 due to the closure of retail stores and government offices, especially for applicants who rely on carriers or third parties for assistance. For instance, some stakeholders told us that the closure of brick-and-mortar carrier stores, government offices, and community centers has meant that applicants who need help with the online application or need access to the internet or connected devices to apply have been unable to do so. As previously noted, FCC waived certain documentation requirements to make it easier for consumers affected by the pandemic to apply to the Verifier.

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[66]In 2018, USAC began requiring that SNAP cards include an enrollment or expiration date to be used as proof of participation, but a few stakeholders have reported that few SNAP cards include this information. FCC and USAC officials told us they made this change due to program integrity concerns.

[67]See GAO-15-335.

Federal internal control standards state that agencies should collect and use quality information—including information that is complete—to make informed decisions and evaluate the agency's performance in achieving key objectives, such as FCC's key goal for the Verifier to improve the consumer experience.[68] Because FCC does not collect or use complete information on the challenges applicants face with the manual review process, FCC is limited in its ability to identify and address these challenges, which may cause eligible individuals to give up on their applications or to be unable to successfully navigate the process. For example, as previously described, more than two-thirds of applicants who went through the manual review process abandoned their applications and applicants who went through manual review were less likely to be found eligible. While it is likely that some applicants who abandoned their applications were actually ineligible, given the high abandonment rate, it is also likely that at least some eligible individuals gave up on their applications. Without quality information on the challenges these applicants faced, such outcomes are likely to continue unchanged and some eligible individuals will be unable to access Lifeline assistance.

Consumer Challenges with the Verifier's Online Application and Support Website

In addition to the challenges with the manual review process above, we found that some applicants may face specific challenges with the Verifier's online application and support website. USAC reported that the Verifier's online application is user-friendly, fast, and easy to understand.[69] However, when we tried to use the Verifier's online application, we identified potential challenges eligible individuals may face when using the application. For example, applicants who cannot upload documents for manual review—because for instance, they do not have access to a scanner or smartphone—are not offered alternative document submission options in the online application, including mailing in the documents.

Further, at the time of our review the application prevented an applicant who was unable to upload documents for manual review from proceeding past the upload page. As a result, the applicant was unable to see if there were any other problems with their application that required action. In November 2020, FCC and USAC officials told us that they believed they had addressed this issue in the second quarter of 2020 by implementing a progress bar that shows all of the problems an applicant has to resolve. However, we found the progress bar did not provide enough information

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[68]GAO-14-704G.

[69]*National Verifier Annual Report and Data*.

to show that there was an error in the application and how to resolve it. Some stakeholders we spoke to also told us that the online application can be difficult for eligible individuals to use, including those who are elderly, unfamiliar with technology, and for whom English is a second language.

Neither the Verifier's online application nor the Lifeline support website that guides applicants through the process fully aligns with selected characteristics for leading federal website design (see table 5), which can result in challenges for consumers.[70] For example, the Verifier's online application had no mechanism for users to provide feedback on the application, which could make it difficult for USAC to identify and address consumer challenges.

Table 5: GAO Evaluation of the Lifeline Support Website and Lifeline National Verifier (Verifier) Online Application against Selected Characteristics for Leading Federal Website Design

Selected Characteristic	Description of Characteristic	GAO Evaluation of Lifelinesupport.org[a]	GAO Evaluation of the Verifier Online Application
Accuracy	The website provides correct and complete information.	**Partially Met.** The site often directed users to eligible telecommunications carriers (carriers), which is inconsistent with other available information, and did not contain up-to-date information about Lifeline rules	**Met.** We did not identify incorrect information.
Clarity	The website makes clear that it is a government website or service. Users easily know what steps to take next and where to get help.	**Partially Met.** We could not identify indicators that the Verifier is a government service. The site sometimes provided mixed messages on whether a consumer should apply on their own or go to a carrier.	**Partially Met.** Some pages provided information we found unclear, including on next steps. For example, if a user cannot upload documents there are no clear instructions on what to do next. While the Federal Communications Commission (FCC) noted the online application includes the FCC logo, some users may not recognize it. The Verifier resides at a ".org" domain rather than at a ".gov" domain.

[70]We selected 20 descriptors of successful government websites that directly relate to a user's ability to access, navigate, and understand the content of the site. The descriptors are drawn from principles and leading practices identified by the U.S. Digital Service and GSA in the U.S. Web Design System's *Design Principles* and the *Digital Services Playbook* to help federal agencies design and build better digital products and services for the American public. We then grouped these descriptors into five characteristics of leading federal websites: accuracy, clarity, understandability, ease of use, and feedback. See app. II and app. III for more information.

Ease of Use	The website is easy to find and navigate. Links are clearly identified, and the website displays the same on different devices and commonly used browsers.	**Met.** We were able to easily navigate and access the site.	**Partially Met.** The site did not come up on some major search engines when searching common phrases like "Lifeline application."
Feedback	The website has a clearly identified, functioning, and easy to use mechanism for users to provide feedback.	**Did Not Meet.** At the time of our review, the site had a website feedback link, but it was difficult to find and did not work. As of November 2020, FCC has corrected this issue.	**Did Not Meet.** We could not identify a mechanism for a user to provide feedback.
Understandability	The website uses consistent, easy-to-understand language, defines complex terms, and is offered in languages other than English.	**Partially Met.** The site did not define some technical or complex terms, such as "benefit qualifying person", and sometimes used inconsistent terminology.	**Partially Met.** The site sometimes used complex or inconsistent terminology such as "authorized agent" or "BQP."

Source: GAO review of U.S. Web Design System Principles and the U.S. Digital Services Playbook and evaluation of the Verifier online application (checklifeline.org) and Lifelinesupport.org. | GAO-21-235

Note: Each characteristic is made up of between two and six descriptors. We scored each descriptor on a scale of one to three. A score of 1 indicates that the site did not align with the descriptor; a score of 2 indicates that the site partially aligned with the descriptor; a score of 3 indicates that the site fully aligned with the descriptor. We averaged the scores of the descriptors for each characteristic to determine the overall evaluation. "Met" indicates that the descriptors had an average score of 2.5 to 3, "partially met" indicates that the descriptors had an average score of 1.5 to 2.4, and "did not meet" indicates that the descriptors had an average score of 1 to 1.4. All scores reflect our evaluation as of July 2020. It is possible that these sites were updated after July 2020, and in some cases, updates may address issues we identified. FCC officials noted that the online application and website are continuously updated and told us that some of the issues we identified may be addressed through recent and forthcoming changes.

[a]Lifelinesupport.org is an informational website that guides consumers through the process of applying for and obtaining Lifeline, while the online application is the website checklifeline.org, which consumers use to apply to have their eligibility checked through the Verifier.

In January 2020, USAC reported that it had made improvements to the online application over the past year in response to feedback from consumer advocates and carriers and that USAC continues to adjust the application. For example, USAC officials told us that they have hired a contractor to conduct usability testing of the online application with actual consumers, especially those who are elderly or have disabilities. Ensuring that both the online application and support website align with characteristics for leading federal website design would help FCC and USAC address challenges consumers may face with the online application as they continue work to improve it, and could ultimately result in an online application that is easier for all consumers to use.

Consumer Challenges Identifying the Verifier's Online Application as a Government Website

Further, we found that consumers may have difficulty identifying the Verifier's online application as a legitimate government service because it

resides at a ".org" domain, rather than at a ".gov" domain.[71] The ".gov" domain conveys to a user that the website is secure and legitimate, and provides official U.S. government content. GSA officials told us that federal regulations and guidance regarding the use of ".gov" domains require that federal websites, including those operated by other organizations on behalf of federal agencies, use ".gov" domains in most cases.[72] These officials explained that in rare cases, when an agency determines that a ".gov" domain is not appropriate for any reason, agencies must report these websites to GSA for oversight and security purposes. GSA officials said that as of October 2020, FCC had not reported the Verifier's online application as a federal government website that did not use a ".gov" domain name.

FCC officials told us that the Verifier application does not use a ".gov" domain because it was their understanding that, as a website operated and maintained by USAC—a non-governmental entity—the website was not eligible for a ".gov" domain and that FCC does not consider the application to be an official website of the U.S. government. Officials also told us that they have not heard feedback with concerns from stakeholders regarding the domain name for the Verifier's online application. As a result, FCC has not applied to GSA for a ".gov" domain name.

In light of FCC's oversight and input on the Verifier's online application, and as the online access point for consumers to obtain support through Lifeline, a federal program, GSA officials told us the Verifier's online application would likely be eligible for a ".gov" domain name. GSA officials also said that FCC should submit an application for a ".gov" domain name so that they could make an eligibility determination and the Chief Digital Officer, who leads the White House Office of Digital Strategy, could decide whether the site should have a ".gov" domain, or be included on

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[71]While a user's ability to identify a website as a federal website or service is a descriptor we assessed as part of the leading characteristics of federal website design, we took additional steps to evaluate the Verifier's use of a ".org" domain because we identified additional federal regulations and guidelines for domain names.

[72]41 C.F.R. § 102-173.30; Office of Management and Budget, M-17-06, § 9 (2016).

GSA's list of exceptions for federal government websites.[73] Alternatively, FCC could choose to host the Verifier's online application on its fcc.gov website. In November 2020, an FCC official told us that FCC had contacted GSA to initiate discussions on this matter and that FCC has directed USAC to gather feedback on consumer confidence in the legitimacy of the Verifier's online application. In comments on the draft report, FCC said that based on the conversations with GSA and in light of GAO's recommendation, it decided to make the Verifier website a subdomain of the "fcc.gov" domain. Although FCC officials told us they did not receive any customer feedback indicating concerns about the legitimacy or security of the Verifier's online application, checklifeline.org, FCC agreed that using a ".gov" domain would more clearly indicate that the Verifier website provides a government service. FCC officials told us that as of January 2021, FCC is actively working with USAC to develop a timeline to complete this project. Without a ".gov" domain or any other clear indicators that the Verifier application is being provided on behalf of the federal government, consumers may be uncomfortable entering personal information and may be less likely to use the online application.

Conclusions

The Lifeline program is an important tool that helps low-income Americans afford vital voice and broadband services. In creating the Lifeline National Verifier, FCC sought to facilitate eligible Americans' access to Lifeline support while protecting the program from waste, fraud, and abuse. Although USAC, under FCC's oversight, has made progress to implement the Verifier, many eligible consumers are unaware of it and may be unable to use it. Additionally, tribal governments and organizations do not have the information they need from FCC to effectively assist residents of tribal lands in using the Verifier to enroll in Lifeline, even though Lifeline support is critical to increasing access to affordable telecommunications services on tribal lands. Without FCC developing a plan to educate consumers about the Verifier and empowering tribal governments to assist residents of tribal lands with the Verifier, eligible consumers, especially those on tribal lands, will continue to lack awareness of the Verifier and the ability to use it.

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[73]At the time of our review, GSA was responsible for issuing ".gov" domains. However, in December 2020, legislation was enacted to transfer, not later than April 26, 2021, that responsibility from GSA to the Cybersecurity and Infrastructure Security Agency in the Department of Homeland Security. In January 2021, GSA officials told us that they do not expect the transfer of responsibility to affect FCC efforts to convert the Verifier's website to a subdomain of "fcc.gov" because the establishment of a subdomain can be managed within FCC.

Further, without measures and information to assess progress toward some of its goals, FCC lacks information it needs to refine and improve the Verifier. While it is too soon to determine if the Verifier is protecting against fraud, FCC has measures in place to monitor fraud moving forward. However, FCC lacks measures to track the Verifier's progress toward the intent of its second goal of delivering value to Lifeline consumers. FCC also lacks information to help it assess and improve its efforts to meet the third goal of improving the consumer experience. Additionally, consumers may experience challenges with the Verifier's online application, such as difficulty identifying the Verifier as a government service, and may be uncomfortable providing sensitive information to a website that does not use a ".gov" domain. Unless FCC identifies and addresses challenges with the Verifier's manual review process and its online application, it will be limited in its ability to improve the consumer experience. As a result, some eligible consumers may abandon their applications and go without the support they need to access crucial telecommunications services. Given that a majority of Lifeline subscribers live in states without state database connections and therefore must undergo manual review more frequently, ensuring that challenges with the manual review process are resolved is particularly important.

Recommendations

We are making six recommendations to FCC.

The Chairman of FCC should develop and implement a plan to educate eligible consumers about the Lifeline program and Verifier requirements that aligns with key practices for consumer education planning. (Recommendation 1)

The Chairman of FCC should provide tribal organizations with targeted information and tools, such as access to the Verifier, that equip them to assist residents of tribal lands with their Verifier applications. (Recommendation 2)

The Chairman of FCC should identify and use performance measures to track the Verifier's progress in delivering value to consumers. (Recommendation 3)

The Chairman of FCC should ensure that it has quality information on consumers' experience with the Verifier's manual review process, and should use that information to improve the consumer experience to meet the Verifier's goals. (Recommendation 4)

The Chairman of FCC should ensure that the Verifier's online application and support website align with characteristics for leading federal website design, including that they are accurate, clear, understandable, easy to use, and contain a mechanism for users to provide feedback. (Recommendation 5)

The Chairman of FCC should convert the Verifier's online application, checklifeline.org, to a ".gov" domain. (Recommendation 6)

Agency Comments

We provided a draft of this report to FCC, the IRS, the Department of Health and Human Services, the Department of Veterans Affairs, and the Social Security Administration for review and comment.[74] In written comments, FCC noted that it is committed to closing the digital divide and continuing to enhance the Verifier and agreed to take steps to address all six of our recommendations. FCC's written comments also noted that FCC disagrees with our assertion that FCC does not have metrics to enable FCC to track the Verifier's progress in delivering value to consumers. However, FCC officials did not provide any additional information to demonstrate that FCC has performance metrics for the Verifier that measure value to consumers as described in the 2016 Modernization Order and therefore we stand by this assertion. FCC's full comments are reprinted in appendix IV. FCC also provided technical comments, which we incorporated as appropriate.

Additionally, we made minor revisions to our sixth recommendation. These revisions did not affect the intent of the recommendation.

The IRS, Department of Health and Human Services, and the Social Security Administration told us that they had no comments on the draft report. The Department of Veterans Affairs provided technical comments, which we incorporated as appropriate.

We are sending copies of this report to the appropriate congressional committees, the Chairman of FCC, the Secretary of Agriculture, the Secretary of Health and Human Services, the Secretary of Veterans Affairs, the Secretary of the Interior, the Secretary of Treasury, the Secretary of Housing and Urban Development, and the Commissioner of

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[74]We offered each federal agency we spoke with the opportunity to comment on our draft report, if desired. The Department of Agriculture, the Department of the Interior, and the Department of Housing and Urban Development did not request a copy of the draft report for comment.

the Social Security Administration. In addition, the report is 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.

Andrew Von Ah
Director, Physical Infrastructure

The Honorable Frank Pallone Jr.
Chairman
Committee on Energy and Commerce
House of Representatives

The Honorable Mike Doyle
Chairman
Subcommittee on Communications and Technology
Committee on Energy and Commerce
House of Representatives

The Honorable G. K. Butterfield
House of Representatives

The Honorable Yvette D. Clarke
House of Representatives

The Honorable Anna G. Eshoo
House of Representatives

The Honorable Doris O. Matsui
House of Representatives

The Honorable Jerry McNerney
House of Representatives

The Honorable Bobby L. Rush
House of Representatives

Appendix I: Survey of State Agencies on the Federal Communications Commission's Coordination Efforts

We administered two surveys to agencies from all 50 states, five U.S. territories, and the District of Columbia to obtain information on the Federal Communications Commission's (FCC) and Universal Service Administrative Company's (USAC) coordination with state governments as USAC implemented the Lifeline National Verifier (Verifier).[1] We administered two surveys because USAC engaged with both state public utility commissions (PUC) and state health agencies, which had different roles in Lifeline administration and Verifier implementation.[2] PUCs designate the eligible telecommunications carriers (carriers) that may participate in the Lifeline program. In some states, PUCs also administer state programs that provide additional discounts on telecommunications service for consumers enrolled in Lifeline. Health agencies own databases containing information on the participants of qualifying programs, which the Verifier could use to automatically verify consumer eligibility and may enter into data-sharing agreements to provide USAC with access to this data. In some cases, USAC engaged with one agency that fulfilled both of these roles for the state or territory. In these cases, we administered both surveys to the agency and refer to them as a PUC or health agency when discussing the results from each survey.

Survey of State PUCs on FCC and USAC Outreach and Verifier Performance

On May 12, 2020, we initiated a survey of 56 PUCs by emailing a Microsoft Word electronic questionnaire to points of contact that USAC officials identified within each PUC. We allowed PUC officials to collaborate on their responses but only accepted one response for each PUC. We asked a series of closed- and open-ended questions about the PUC's background with the Lifeline program, FCC's and USAC's outreach regarding the Verifier's implementation, and the Verifier's performance.[3] The questions we asked and the aggregated results of the responses to the closed-ended questions are shown below. We do not

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[1]For the purposes of our report, we refer to the 50 states, 5 U.S. territories, and the District of Columbia collectively as "states."

[2]We refer to the state agencies that USAC engaged with to establish connections to the Supplemental Nutrition Assistance Program (SNAP), Medicaid, or Supplemental Security Income (SSI) databases as "health agencies."

[3]We asked additional questions related to the Universal Service Fund high-cost program to support another GAO review. 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).

provide results for open-ended questions. We received 50 completed
survey responses—a response rate of 89 percent.[4]

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[4]This represents the number of surveys we received back in relation to the number of
surveys we sent out. However, not all surveys had a response to each question. The
number of total responses for each question is indicated at the end of the respective
question.

Background

1. Does your state government provide a Lifeline subsidy in addition to the federal subsidy? n=50

Response	Number of Responses
Yes	21
No	29
Don't know	0

2. **Before** the National Verifier's launch in your state, did your state government administer a process for Lifeline providers to verify their customers' Lifeline eligibility? n=50

Response	Number of Responses
Yes (go to question 3)	26
No (go to question 5)	23
Don't know (go to question 5)	1

If your state government administered a process for Lifeline providers to verify their customer's eligibility:

3. Please describe your state government's process that providers in your state used to verify their customers' Lifeline eligibility **before** the National Verifier's launch in your state. (Written responses not included)
4. How did your state government fund the administration of the process that providers in your state used to verify their customers' Lifeline eligibility **before** the National Verifier's launch in your state? (Written responses not included) n=27

Response	Number of Responses
State general fund	9
User fees from Lifeline providers	6
Other	12

FCC and USAC Outreach

5. How useful, if at all, were the following forms of communication to your agency in fulfilling your responsibilities related to the National Verifier's implementation? (Written responses not included)

5a. FCC docket filings (i.e., orders, public notices, etc.) n=47

Response	Number of Responses
Very useful	10

5a. FCC docket filings (i.e., orders, public notices, etc.) n=47

Response	Number of Responses
Moderately useful	18
Slightly useful	9
Not at all useful	1
Not used	4
Don't know	5

5b. USAC publications (i.e. reports, newsletters, announcements) n=49

Response	Number of Responses
Very useful	21
Moderately useful	14
Slightly useful	6
Not at all useful	0
Not used	4
Don't know	4

5c. Meetings with USAC (i.e. webinars, NARUC conferences, etc.)[1] n=47

Response	Number of Responses
Very useful	21
Moderately useful	15
Slightly useful	5
Not at all useful	0
Not used	5
Don't know	1

5d. Direct contact with USAC by phone or email n=49

Response	Number of Responses
Very useful	29
Moderately useful	9
Slightly useful	3

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[1]NARUC refers to the National Association of Regulatory Utility Commissioners, an association for PUCs.

5d. Direct contact with USAC by phone or email n=49

Response	Number of Responses
Not at all useful	1
Not used	4
Don't know	3

5e. Direct contact with FCC by phone or email n=48

Response	Number of Responses
Very useful	5
Moderately useful	7
Slightly useful	5
Not at all useful	3
Not used	23
Don't know	5

5f. Other n=12

Response	Number of Responses
Very useful	1
Moderately useful	0
Slightly useful	0
Not at all useful	0
Not used	8
Don't know	3

6. How much do you agree or disagree with the following statement about the communication your agency received from USAC regarding the National Verifier's implementation? "The communication my agency received from USAC regarding the National Verifier's implementation _____."

6a. Clarified the roles and responsibilities of my state's agencies and other Lifeline stakeholders n=50

Response	Number of Responses
Strongly agree	16
Somewhat agree	16
Neither agree nor disagree	11
Somewhat disagree	2
Strongly disagree	2

6a. Clarified the roles and responsibilities of my state's agencies and other Lifeline stakeholders n=50

Response	Number of Responses
Don't know	3

6b. Articulated USAC's process for making and enforcing decisions n=50

Response	Number of Responses
Strongly agree	9
Somewhat agree	12
Neither agree nor disagree	18
Somewhat disagree	6
Strongly disagree	2
Don't know	3

6c. Articulated FCC's process for making and enforcing decisions n=50

Response	Number of Responses
Strongly agree	6
Somewhat agree	11
Neither agree nor disagree	20
Somewhat disagree	5
Strongly disagree	4
Don't know	4

6d. Enabled my agency to help USAC achieve the National Verifier's objectives and address its risks n=48

Response	Number of Responses
Strongly agree	12
Somewhat agree	12
Neither agree nor disagree	12
Somewhat disagree	5
Strongly disagree	3
Don't know	4

6e. Enabled my agency to help FCC achieve the National Verifier's objectives and address its risks n=50

Response	Number of Responses
Strongly agree	9
Somewhat agree	10
Neither agree nor disagree	16
Somewhat disagree	7
Strongly disagree	3
Don't know	5

6f. Provided my agency with complete information n=50

Response	Number of Responses
Strongly agree	13
Somewhat agree	19
Neither agree nor disagree	6
Somewhat disagree	6
Strongly disagree	3
Don't know	3

6g. Provided my agency with timely information n=49

Response	Number of Responses
Strongly agree	20
Somewhat agree	13
Neither agree nor disagree	6
Somewhat disagree	3
Strongly disagree	4
Don't know	3

7. Did your agency use the following forms of communication to provide feedback regarding the National Verifier's implementation? (Written responses not included)

7a. FCC docket filings (i.e. comments, petitions, etc.) n=48

Response	Number of Responses
Yes	14
No	29
Don't know	5

7b. Meetings with USAC (i.e. webinars, NARUC conferences, etc.) n=49

Response	Number of Responses
Yes	33
No	13
Don't know	3

7c. Direct contact with USAC by phone or email n=49

Response	Number of Responses
Yes	39
No	6
Don't know	4

7d. Direct contact with FCC by phone or email n=48

Response	Number of Responses
Yes	10
No	31
Don't know	7

7e. Other n=11

Response	Number of Responses
Yes	0
No	7
Don't know	4

8. How satisfied or dissatisfied were you with USAC's responsiveness to feedback your agency provided over the following forms of communication regarding the National Verifier's implementation? (Written responses not included)

8a. FCC docket filings (i.e. comments, petitions, etc.) n=48

Response	Number of Responses
Satisfied	6
Neither satisfied nor dissatisfied	12
Dissatisfied	1
Don't know	4
Not applicable	25

8b. Meetings with USAC (i.e. webinars, NARUC conferences, etc.) n=49

Response	Number of Responses
Satisfied	21
Neither satisfied nor dissatisfied	8
Dissatisfied	0
Don't know	3
Not applicable	17

8c. Direct contact with USAC by phone or email n=49

Response	Number of Responses
Satisfied	26
Neither satisfied nor dissatisfied	8
Dissatisfied	3
Don't know	2
Not applicable	10

8d. Other n=13

Response	Number of Responses
Satisfied	1
Neither satisfied nor dissatisfied	0
Dissatisfied	0
Don't know	1
Not applicable	11

National Verifier Performance

9. In your state, how effective, if at all, is the National Verifier at:

9a. Facilitating consumer choice among Lifeline providers? n=50

Response	Number of Responses
Very effective	3
Moderately effective	4
Slightly effective	1
Not at all effective	2
Too soon to tell	9

**9a. Facilitating consumer choice among Lifeline providers?
n=50**

Response	Number of Responses
Don't know	24
Not applicable	7

9b. Improving the consumer's enrollment experience? n=49

Response	Number of Responses
Very effective	4
Moderately effective	3
Slightly effective	0
Not at all effective	4
Too soon to tell	10
Don't know	21
Not applicable	7

9c. Reducing fraud in the Lifeline program? n=49

Response	Number of Responses
Very effective	4
Moderately effective	6
Slightly effective	0
Not at all effective	1
Too soon to tell	11
Don't know	20
Not applicable	7

10. In your state, how challenging, if at all, are the following items to consumers applying for
Lifeline support through the National Verifier? (Written responses not included)

10a. Awareness of the Lifeline program n=50

Response	Number of Responses
Very challenging	2
Somewhat challenging	22
Not challenging	6
Don't know	14
Not applicable	6

10b. The application process n=50

Response	Number of Responses
Very challenging	3
Somewhat challenging	17
Not challenging	5
Don't know	20
Not applicable	5

10c. Documentation requirements n=50

Response	Number of Responses
Very challenging	4
Somewhat challenging	11
Not challenging	4
Don't know	26
Not applicable	5

**10d. Accessing resources required to complete application
(e.g., computer, internet, printer, post office) n=50**

Response	Number of Responses
Very challenging	3
Somewhat challenging	17
Not challenging	3
Don't know	22
Not applicable	5

10e. Navigating the online application process n=50

Response	Number of Responses
Very challenging	4
Somewhat challenging	12
Not challenging	5
Don't know	24
Not applicable	5

10f. Language barriers n=50

Response	Number of Responses
Very challenging	2
Somewhat challenging	5
Not challenging	6
Don't know	32
Not applicable	5

10g. Access for people with disabilities n=50

Response	Number of Responses
Very challenging	2
Somewhat challenging	4
Not challenging	2
Don't know	37
Not applicable	5

10h. Address verification n=50

Response	Number of Responses
Very challenging	3
Somewhat challenging	6
Not challenging	6
Don't know	30
Not applicable	5

10i. Name verification n=50

Response	Number of Responses
Very challenging	1
Somewhat challenging	8
Not challenging	6
Don't know	30
Not applicable	5

10j. Other n=10

Response	Number of Responses
Very challenging	0
Somewhat challenging	0

10j. Other n=10

Response	Number of Responses
Not challenging	0
Don't know	3
Not applicable	7

11. Did your state government conduct outreach to the following stakeholders regarding the National Verifier? (Written responses not included)

11a. Lifeline carriers n=50

Response	Number of Responses
Yes	17
No	23
Don't know	10

11b. Local governments n=50

Response	Number of Responses
Yes	5
No	34
Don't know	11

11c. Community-based organizations n=49

Response	Number of Responses
Yes	9
No	28
Don't know	12

11d. Consumers n=50

Response	Number of Responses
Yes	13
No	25
Don't know	12

11e. Other n=9

Response	Number of Responses
Yes	0
No	4

11e. Other n=9

Response	Number of Responses
Don't know	5

12. If you responded "yes" to any of the options in question 11 above, please describe this outreach. (Written responses not included)
13. If you have any additional comment or would like to expand on any of your responses for **questions 1 through 12**, please type them in this box below. (Written responses not included)

Survey of State Health Agencies on Data-Sharing Agreements

On May 12, 2020, we initiated a survey of 56 state health agencies by emailing a Microsoft Word electronic questionnaire to points of contact that USAC officials identified within each agency. We allowed agency officials to collaborate on their responses but only accepted one response for each agency. We asked a series of closed- and open-ended questions about the agencies' experiences reaching a computer matching agreement (CMA) with USAC–a data-sharing agreement that would enable a data-sharing connection between the Verifier and state data systems–and about the state's Medicaid and SNAP documentation. The questions we asked and the aggregated results of the responses to the closed-ended questions are shown below. We do not provide results for open-ended questions. We received 45 completed survey responses—a response rate of 80 percent.

Reaching a CMA with USAC

1. As of May 1, 2020, has USAC contacted your agency about establishing a CMA for the purpose of checking state data to verify Lifeline applicant eligibility through the National Verifier? n=45

Response	Number of Responses
Yes (go to question 2)	33
No (go to question 5)	7
Don't know (go to question 5)	5

2. As of May 1, 2020, has your agency reached a CMA with USAC for the purpose of checking Lifeline applicant eligibility through the National Verifier? n=35

Response	Number of Responses
Yes (go to question 4)	21
No (go to question 3)	14
Don't know (go to question 4)	0

3. Has your agency worked with USAC to reach a CMA? n=21

Response	Number of Responses
Yes	17
No	4
Don't know	0

4. How challenging, if at all, have the following items been in your work with USAC to establish a CMA? (Written responses not included)

4a. Security or privacy of beneficiary data n=34

Response	Number of Responses
Very challenging	6
Moderately challenging	2
Slightly challenging	10
Not at all challenging	12
Don't know	4

4b. Funding required to establish database connection n=34

Response	Number of Responses
Very challenging	5

4b. Funding required to establish database connection n=34

Response	Number of Responses
Moderately challenging	2
Slightly challenging	5
Not at all challenging	16
Don't know	6

4c. Time required to establish database connection n=34

Response	Number of Responses
Very challenging	11
Moderately challenging	5
Slightly challenging	5
Not at all challenging	8
Don't know	5

4d. State statutory requirements preventing data sharing n=33

Response	Number of Responses
Very challenging	3
Moderately challenging	5
Slightly challenging	7
Not at all challenging	12
Don't know	6

4e. Other n=6

Response	Number of Responses
Very challenging	4
Moderately challenging	1
Slightly challenging	1
Not at all challenging	0
Don't know	0

Program Documents

5. Does your state notify Medicaid and SNAP recipients that they can use their enrollment letters to prove their eligibility for the Lifeline program?

5a. Medicaid n=44

Response	Number of Responses
Yes	6
No	19
Don't know	19

5b. SNAP n=45

Response	Number of Responses
Yes	10
No	22
Don't know	13

If you answered "No" to either of the above, go to question 6. Otherwise, go to question 7.

6. How challenging would it be to notify Medicaid and/or SNAP recipients that they can use their enrollment notification letter to prove their eligibility for the Lifeline program? n=30

Response	Number of Responses
Very challenging	3
Moderately challenging	11
Slightly challenging	8
Not at all challenging	1
Don't know	5
Not applicable	2

7. Do your state-issued benefits program cards contain the following information?

7a. Medicaid n=42

Response	Number of Responses
Issue date	
Yes	10
No	11
Don't know	21
Expiration date	
Yes	5
No	16
Don't know	21

7b. SNAP n=43

Response	Number of Responses
Issue date	
Yes	13
No	17
Don't know	13
Expiration date	
Yes	8
No	22
Don't know	13

8. If you have any additional comments or would like to expand on any of your previous responses, please type them in the space below. (Written responses not included)

Survey Respondents

We received responses representing 50 state PUCs and 45 state health agencies, which are summarized in table 6.

Table 6: List of Survey Responses Received on the Federal Communications Commission's (FCC) Efforts to Coordinate with States to Implement the Lifeline National Verifier (Verifier)

States	Survey on FCC outreach and Verifier performance	Survey on FCC efforts to reach data-sharing agreements
Alabama	✔	✔
Alaska	✔	✔
American Samoa	✔	✔
Arizona	✔	—
Arkansas	✔	✔
California	—	—
Colorado	—	✔
Connecticut	✔	✔
Delaware	—	✔
District of Columbia	✔	✔
Florida	✔	✔
Georgia	✔	—
Guam	✔	✔
Hawaii	✔	✔
Idaho	✔	✔
Illinois	✔	✔
Indiana	✔	✔
Iowa	✔	✔
Kansas	✔	✔
Kentucky	✔	✔
Louisiana	✔	✔
Maine	—	—
Maryland	✔	—
Massachusetts	✔	✔
Michigan	✔	✔
Minnesota	✔	✔
Mississippi	✔	✔
Missouri	✔	✔
Montana	✔	—
Nebraska	✔	✔
Nevada	✔	✔

States	Survey on FCC outreach and Verifier performance	Survey on FCC efforts to reach data-sharing agreements
New Hampshire	✔	✔
New Jersey	✔	✔
New Mexico	✔	✔
New York	✔	✔
North Carolina	✔	✔
North Dakota	✔	✔
Northern Mariana Islands	—	—
Ohio	✔	✔
Oklahoma	✔	—
Oregon	✔	✔
Pennsylvania	✔	✔
Puerto Rico	✔	✔
Rhode Island	✔	✔
South Carolina	✔	✔
South Dakota	✔	✔
Tennessee	—	✔
Texas	✔	✔
U.S. Virgin Islands	✔	—
Utah	✔	✔
Vermont	✔	✔
Virginia	✔	✔
Washington	✔	✔
West Virginia	✔	✔
Wisconsin	✔	✔
Wyoming	✔	—

Legend: ✔ = responded to survey, — = did not respond.

Source: GAO survey of state public utility commissions and state health agencies. | GAO-21-235

Note: We refer to the 50 states, 5 U.S. territories, and District of Columbia collectively as "states."

Appendix II: Objectives, Scope, and Methodology

This report examines (1) the status of the Lifeline National Verifier (Verifier); (2) the extent to which Federal Communications Commission (FCC) coordinated with state and federal stakeholders, educated consumers, and facilitated the involvement of tribal stakeholders; and (3) the extent to which the Verifier is meeting its goals.

To address all three objectives, we reviewed FCC orders related to the Verifier, including orders temporarily waiving certain Lifeline rules in response to the Coronavirus Disease 2019 (COVID-19) pandemic, and FCC and Universal Service Administrative Company (USAC) public and internal documentation on Verifier implementation.[1] We also reviewed public comments on Lifeline proceedings related to the Verifier in FCC's public docket, and prior GAO reports on Lifeline.[2] In addition, we analyzed FCC and USAC data on the Verifier's performance from June 2018, when the Verifier launched in the first states, to June 2020, the most recent data available at the time of our review, to understand how eligible telecommunications carriers (carriers) and consumers were using the Verifier and how the Verifier was meeting its goals.

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[1]See *Lifeline and Link Up Reform and Modernization, Report and Order and Further Notice of Proposed Rulemaking*, 27 FCC Rcd. 6656 (2012); *Lifeline and Link Up Reform and Modernization, Second Further Notice of Proposed Rulemaking, Order on Reconsideration, Second Report and Order, and Memorandum Opinion and Order,* 30 FCC Rcd. 7818 (2015); *Lifeline and Link Up Reform and Modernization, Third Report and Order, Further Report and Order, and Order on Reconsideration,* 31 FCC Rcd. 3962 (2016); *Lifeline and Link Up Reform and Modernization, Fourth Report and Order, Order on Reconsideration, Memorandum Opinion and Order, Notice of Proposed Rulemaking, and Notice of Inquiry,* 32 FCC Rcd. 10475 (2017); *Lifeline and Link Up Reform and Modernization, Fifth Report and Order, Memorandum Opinion and Order and Order on Reconsideration, and Further Notice of Proposed Rulemaking*, 34 FCC Rcd. 10886 (2019); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-285 (WCB Mar. 17, 2020); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-354 (WCB Mar. 30, 2020); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-462 (WCB Apr. 29, 2020); *Lifeline and Link Up Reform and Modernization,* WC Docket No. 11-42, Order, DA 20-577 (WCB Jun. 1, 2020); *Lifeline and Link Up Reform Modernization,* WC Docket No. 11-42, Order, DA 20-891 (WCB Aug. 17, 2020); *Lifeline and Link Up Reform Modernization*, WC Docket No. 11-42, Order, DA 20-1357 (WCB Nov.16, 2020).

[2]See GAO, *Telecommunications: Additional Actions Needed to Address Significant Risks in FCC's Lifeline Program*, GAO-17-538 (Washington, D.C.: May 30, 2017); *Telecommunications: FCC Should Evaluate the Efficiency and Effectiveness of the Lifeline Program*, GAO-15-335 (Washington, D.C.: Mar. 24, 2015); and *Telecommunications: Improved Management Can Enhance FCC Decision Making for the Universal Service Fund Low-Income Program*, GAO-11-11 (Washington, D.C.: Oct. 28, 2010).

To assess the reliability of these data, we reviewed FCC and USAC documentation and conducted manual and electronic reviews for inconsistent, illogical, or missing data. We also interviewed FCC and USAC officials responsible for managing data collection, review, and storage. Based on our assessment, we determined these data to be sufficiently reliable for the purposes of reporting on the Verifier's performance with the following limitations. First, because USAC launched the Verifier earlier in states with automated state database connections and with fewer Lifeline subscribers, there are fewer applications represented for states without automated state database connections and for states with more Lifeline subscribers as of June 2020. To account for this limitation, we use averages and present the data according to the number of state database connections available whenever possible. Second, because FCC temporarily waived certain program requirements for manual recertification and reverification in March 2020 due to COVID-19, recertification and reverification data from March 2020 to June 2020 contain only automated approvals and are not fully reflective of typical activity.[3] We note this limitation where applicable.

Additionally, we interviewed a non-generalizable selection of 25 industry, tribal, and consumer stakeholders regarding their coordination with FCC and USAC and experiences using the Verifier. To select these stakeholders, we selected for variety and considered: size (carriers), location, types of services provided or consumers served, public comments, and recommendations. Table 7 lists these stakeholders. While these interviews are not generalizable, they provided us with a variety of perspectives on the Verifier's implementation.

Table 7: List of Industry, Tribal, and Consumer Stakeholders Interviewed

Lifeline eligible telecommunications carriers (carriers)
Assist Wireless
AT&T
Century Link
Smith Bagley, doing business as (d.b.a.) Cellular One
Sprint d.b.a. Assurance Wireless
Telrite d.b.a. Life Wireless
TracFone d.b.a. SafeLink

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[3]As stated above, Verifier performance data through June 2020 were the most recent available at the time of our review.

Lifeline eligible telecommunications carriers (carriers)
Industry Associations
CTIA – The Wireless Association
National Lifeline Association
Tribally owned carriers
Gila River Telecommunications, Inc.
Standing Rock Telecom, Inc.
Wind River Internet
Tribal advocacy organizations
Arizona State University, American Indian Policy Institute
National Congress of American Indians[a]
National Tribal Telecommunications Association
Oceti Sakowin Tribal Utility Authority
Tribal governments and representatives
The Choctaw Nation of Oklahoma
Nez Perce Tribe
Saint Regis Mohawk Tribe (Mohawk Networks)[b]
Confederated Tribes and Bands of the Yakama Nation (Yakama Nation Networks)[c]
Consumer advocacy groups
National Association of Regulatory Utility Commissioners
National Association of State Utility Consumer Advocates
National Consumer Law Center[d]
Service organizations
Miriam's Kitchen
Open Access Connections

Source: GAO. | GAO-21-235

[a]A representative from AMERIND Risk attended this interview.

[b]We interviewed a representative for Mohawk Networks, which is a broadband service provider owned by the Saint Regis Mohawk Tribe. As of our interview in June 2020, Mohawk Networks had an application for eligible telecommunications carrier status pending before FCC. Because it is not yet an eligible telecommunications carrier, we consider Mohawk Networks to be a tribal government representative for the purposes of our review.

[c]We interviewed a representative for Yakama Nation Networks, which is a wireless internet service provider owned by the Confederated Tribes and Bands of the Yakama Nation. We count it here as a tribal government representative because it is not an eligible telecommunications carrier.

[d]Representatives from other consumer advocacy groups attended this interview, including Asian Americans Advancing Justice, Free Press, and the National Hispanic Media Coalition, among others.

To examine the status of the Verifier, we analyzed FCC and USAC data on Lifeline subscribership from June 2018, when the Verifier was first launched, to June 2020, the most recent data available at the time of our

review, to understand how Lifeline subscribership has changed over time. To assess the reliability of these data, we conducted manual reviews for inconsistent, illogical, or missing data, and interviewed FCC and USAC officials.[4] Based on this assessment, we determined these data to be sufficiently reliable for the purposes of reporting changes in Lifeline subscribership over time. We also reviewed FCC and USAC data on the rate of eligible consumers participating in Lifeline from 2016 to 2020, the most recent data available. To assess the reliability of these data, we reviewed documentation on FCC and USAC's methodology, conducted manual reviews for inconsistencies or missing data, and interviewed FCC and USAC officials. Based on this assessment, we determined these data to be sufficiently reliable for the purposes of describing the changes in Lifeline participation rates over time. To further describe the status of the Verifier, we reviewed USAC documentation on the Verifier's launch process, including USAC's semiannual Lifeline National Verifier Plans from January 2017 to July 2020 and combined this information with Verifier performance data.[5] We also interviewed FCC and USAC officials to gain an understanding of the status of the Verifier and future plans.

To determine the extent to which FCC coordinated with state and federal stakeholders, educated consumers, and facilitated involvement of tribal stakeholders, we administered two surveys to agencies from all 50 states, five U.S. territories, and the District of Columbia.[6] We surveyed state public utility commissions on the Verifier's performance and FCC's and USAC's outreach regarding the Verifier's implementation, and we surveyed state health agencies on their experiences working to establish data-sharing agreements with FCC and USAC. The response rate for our surveys was 89 percent (50 out of 56 states) and 80 percent (45 out of 56 states), respectively. For copies of the survey questionnaires, consolidated survey responses, and a list of states that participated, see appendix I.

To ensure the quality and reliability of the survey questionnaires, we pretested each survey questionnaire with three agencies selected to

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[4]GAO-15-335.

[5]Universal Service Administrative Company, *Lifeline National Verifier Plan* (January 2017); *Lifeline National Verifier Plan* (July 2017); *Lifeline National Verifier Plan* (January 2018); *Lifeline National Verifier Plan* (July 2018); *Lifeline National Verifier Plan* (January 2019); *Lifeline National Verifier Plan* (July 2019); *National Verifier Plan* (January 2020); and *Lifeline National Verifier Plan* (July 2020).

[6]This appendix refers to these as "states."

include states that both had and had not established data-sharing agreements with FCC and USAC, states where USAC only worked with one agency, and states where the Verifier both had and had not hard launched, among other factors. We conducted these pretests to check (1) the clarity and flow of the questions, (2) the appropriateness of the terminology used, and (3) whether the respondents had the knowledge to answer the questions. We revised the questionnaires based on these pretests.

We further interviewed a selection of three state health agencies to obtain additional non-generalizable information on the challenges they faced establishing data-sharing connections with FCC. We selected these agencies to include those that reported a variety of challenges establishing a data-sharing agreement in their survey responses and states that both had and had not established data-sharing agreements, among other factors. We also interviewed representatives of a public utility commission from one of the three states to which FCC granted a waiver to continue their legacy eligibility verification processes to obtain information on the conditions of this waiver. We interviewed officials from all seven federal agencies that own data on federal assistance programs that qualify consumers for Lifeline, including data that could verify consumer income, to learn about FCC's efforts to collaborate with them. Additionally, we reviewed written data-sharing agreements between FCC and state and federal agencies. We compared the information we gathered on FCC's collaboration efforts to the seven leading collaboration practices identified in our previous work, as shown in figure 5.[7]

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[7]GAO, *Managing for Results: Key Considerations for Implementing Interagency Collaborative Mechanisms*, GAO-12-1022 (Washington, D.C.: Sep. 27, 2012).

Figure 5: Leading Collaboration Practices

Key features		Key considerations
	Outcomes and accountability	Have short-term and long-term outcomes been clearly defined? Is there a way to track and monitor their progress?
	Bridging organizational cultures	What are the missions and organizational cultures of the participating agencies? Have agencies agreed on common terminology and definitions?
	Leadership	How will leadership be sustained over the long-term? If leadership is shared, have roles and responsibilities been clearly identified and agreed upon?
A B C D	**Clarity of roles and responsibilities**	Have participating agencies clarified roles and responsibilities?
	Participants	Have all relevant participants been included? Do they have the ability to commit resources for their agency?
	Resources	How will the collaborative mechanism be funded and staffed? Have online collaboration tools been developed?
	Written guidance and agreements	If appropriate, have participating agencies documented their agreement regarding how they will be collaborating? Have they developed ways to continually update and monitor these agreements?

Source: GAO. | GAO-21-235

In addition, we assessed USAC's consumer education efforts by reviewing consumer education materials that USAC distributed to stakeholders and posted on its website, interviewing FCC and USAC officials, and reviewing information from our interviews with carriers, consumer advocates, service organizations, and tribal stakeholders. Further, we reviewed USAC's consumer education plan and compared it to the nine key practices for consumer education planning identified in our previous work.[8] We also determined that the information and

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[8]We identified nine key practices for planning a consumer education campaign that can help agencies overcome potential challenges. GAO, *Digital Television Transition: Increased Federal Planning and Risk Management Could Further Facilitate the DTV Transition*, GAO-08-43 (Washington, D.C.: Nov. 19, 2007).

communication component of internal control was significant to this
objective, along with the underlying principle that management should
externally communicate the necessary quality information to achieve the
entity's objectives.[9] We assessed whether FCC and USAC externally
communicated quality information about the Verifier to tribal governments
based on FCC and USAC documents and our interviews with tribal
stakeholders.

To assess the extent to which the Verifier is meeting the three goals FCC
identified for it, we drew on our analysis of Verifier performance data,
reviewed USAC reporting on progress for each goal in the annual Lifeline
Verifier report, and interviewed FCC and USAC officials regarding the
Verifier's performance. For each specific goal, we took the following
steps:

- **Goal 1: prevent and reduce fraud.** We reviewed FCC
  documentation on Verifier and Lifeline fraud controls and how the
  Verifier's design addresses fraud risks, including information on fraud
  controls provided as follow-up to our 2017 reporting. We also
  reviewed the performance measures FCC and USAC use to monitor
  fraud, waste, and abuse in the Lifeline program and for the Verifier
  specifically, including improper payment reporting for Lifeline.[10]
  Additionally, we reviewed our prior reports on the quality of internal
  and fraud controls in the Lifeline program.[11]

- **Goal 2: reduce costs to the government and Lifeline carriers.** We
  reviewed USAC documentation and interviewed USAC and FCC
  officials about the performance measures and outcomes related to
  this goal. We compared this information to leading practices for
  performance management regarding performance measures.[12]

- **Goal 3: improve the consumer enrollment experience and
  facilitate consumer choice.** To understand how consumers

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[9]GAO, *Standards for Internal Control in the Federal Government*, GAO-14-704G
(Washington, D.C.: September 2014).

[10]Federal Communications Commission, *Agency Financial Report Fiscal Year* 2019 (Nov.
19, 2019); Universal Service Administrative Company, *Improper Payment Rate and
Margin of Error, Lifeline Program FY 2019* (Nov. 15, 2019). We did not independently
verify the accuracy of FCC's improper payment rate for Lifeline.

[11]GAO-17-538; GAO-11-11.

[12]GAO, *The Results Act: An Evaluator's Guide to Assessing Agency Annual Performance
Plans*, GAO/GGD-10.1.20 (Washington, D.C.: April 1998).

experience the Verifier process, we reviewed non-generalizable information from our interviews with carriers, consumer groups and service organizations, and tribal stakeholders, as well as the results of our analysis of Verifier performance data regarding Verifier application outcomes. We also determined that the quality information and communication component of internal control was significant to this objective, along with the underlying principle that management should design the entity's information system and related control activities to respond to risks.[13] We specifically assessed whether FCC and USAC collected and used quality information about consumer experiences to monitor the Verifier's performance in improving the consumer experience and inform decision-making. Additionally, we reviewed the Verifier's public support website, lifelinesupport.org, and online application, checklifeline.org. Because the online application is a live data system, we used USAC's test environment, which mirrors the live application, and mock application data provided by USAC to ensure that we could proceed through the application and see how it functioned under a range of scenarios.[14] We tested 13 scenarios that fell into three categories: consumer is found eligible, consumer's application has one error, and consumer's application has multiple errors. We compared the support website and online application to selected characteristics of leading federal website design drawn from the U.S. Digital Service's *Digital Services Playbook* and the U.S. Web Design System's *Design Principles*.[15] To identify these characteristics, we selected 20 descriptors of successful federal website design that directly relate to a user's ability to access, navigate, and understand a website. We then grouped these descriptors based on similarity into five characteristics. To ensure that we consistently and objectively applied these characteristics, we developed a standardized rubric that two analysts used to independently review and score the online application and support website respectively. The two analysts met to reconcile any differences in their scoring in June and July 2020.[16] See

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[13]GAO-14-704G.

[14]We also had access to the test environment for the carrier application and the Lifeline Support Center data system, but we did not review these sites against criteria because our focus was on the consumer experience.

[15]U.S. Digital Service, *Digital Services Playbook*, accessed May 21, 2020, https://playbook.cio.gov and U.S. Web Design System, *Design Principles*, accessed May 21, 2020, https://designsystem.digital.gov/design-principles

[16]All scores reflect our evaluation as of July 2020. It is possible that these sites were updated after July 2020, and in some cases updates may address issues we identified.

Appendix III for a copy of the rubric. We also compared information from our assessment of users' ability to recognize the online application and support website as government websites to Office of Management and Budget policies regarding the use of ".gov" domains for federal agency public websites and digital services.[17] Additionally, we interviewed General Services Administration officials responsible for registering government websites.

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[17]Office of Management and Budget, *Policies for Federal Agency Public Websites and Digital Services*, M-17-06 (Washington, D.C.: Nov. 8, 2016).

We reviewed the Lifeline National Verifier online application (checklifeline.org) and support website (lifelinesupport.org) against selected characteristics for leading federal website design drawn from the U.S. Digital Service's Digital Services Playbook and the U.S. Web Design System *Design Principles*.[1] To identify these characteristics, we grouped together operational descriptors for successful federal websites related to a user's ability to access, navigate, and understand a website. To evaluate the online application and the support website, two analysts independently reviewed and scored each site on all descriptors using the same rubric, and the analysts met to reconcile their scores in June and July 2020 respectively.[2] The characteristics and descriptors we used are described in tables 8 and 9, along with our evaluation.

Table 8: GAO Evaluation of the Lifeline National Verifier Online Application against Selected Characteristics for Leading Federal Website Design

Selected Characteristic	Descriptors	GAO Evaluation
Accuracy		**Met**
	Is the information correct?	We did not identify any incorrect information.
	Is the information provided consistent with corroborating information provided by the Federal Communications Commission (FCC), the Universal Service Administrative Company (USAC), providers, or other publicly available information?	We did not identify any inconsistent information or discrepancies.
	Is the information provided complete? Does it cover all information a user would need to know to proceed?	In some instances, the application omitted information the consumer may need to complete their application. For example, the application omitted a complete list of appropriate documentation to prove participation in the Supplemental Nutrition Assistance Program (SNAP).
Clarity		**Partially met**
	Did the page provide clear information?	Some pages provided information we found unclear. For example, when some consumers get a duplicate subscriber error, meaning they are already enrolled in Lifeline, the page did not clearly state that they are already receiving Lifeline; rather it said, "Your address qualifies for Lifeline."

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[1]U.S. Digital Service, *Digital Services Playbook;* U.S. Web Design System, *Design Principles.*

[2]All scores reflect our evaluation as of July 2020. It is possible that these sites were updated after July 2020 and in some cases may address issues we identified.

Selected Characteristic	Descriptors	GAO Evaluation
	Was it clear that this is a government website?	The site "checklifeline.org" does not use a ".gov" domain, While FCC noted that the FCC logo is on the web page, we found that it may not be easily recognizable by an average user, and we found no other indicator that USAC is working on behalf of the U.S. government.
	Was it clear what service the government is providing?	We were not able to identify any obvious indicator that explains that the Verifier is a government-provided service or that USAC is verifying eligibility on behalf of the U.S. government.
	Were we able to discern what steps a user was supposed to take next?	When a consumer can be automatically verified, we could discern the next steps a user should take. However, if the consumer has an error and cannot upload documents, the application "dead ended" on the upload page, and there are no instructions on steps other than to upload documents.
	Is the information provided responsive to the question or purpose of the page?	We generally found page information to be responsive to the stated purpose.
	Do users know where to go to get help?	A phone number for the Lifeline Support Center appeared on the home page for the application, but we could not locate information on where to get help on some error pages, a point at which a consumer may need help.
Ease of Use		**Partially met**
	Is the site easy to navigate?	We were not able to identify a way for a user to move forward in their application if they have an error and are not able to upload documents.
	Do pages contain links to key information or services such as frequently asked questions or help?	We only identified links to help or frequently asked questions on application home pages, but not on many error pages.
	Are links clearly identified and appropriately contextualized?	We did not have difficulty identifying or understanding the context for links.
	Is the site easy to find, meaning an individual could easily find it using a navigation bar or search and would not need to trace back through a series of internal links to find it again?	The application does not come up on some search engines when searching common phrases like "Lifeline" or "Lifeline application."
	Does the site display the same on different devices and in commonly used browsers (Chrome, Safari, Edge, Firefox)?	We did not identify any issues with the display on different browsers or devices.
Feedback		**Did not meet**
	Was there a clearly identified and functioning mechanism to provide feedback?	We could not identify a mechanism for feedback.
	Is it easy to provide feedback (i.e. can individuals provide feedback on the site, or do they have to navigate to other sites or submit feedback through other means like mail, email, or phone)?	We could not identify a mechanism for feedback.

Selected Characteristic	Descriptors	GAO Evaluation
Understandability		**Partially met**
	Did the site use easy-to-understand language?	On some pages the site used language that could be difficult to understand.
	Was technical or complex terminology defined?	The site occasionally used terms that were not defined or explained such as "authorized agent" and "BQP".
	Was the same language or terminology consistently used across all pages?	We identified limited instances of inconsistent terminology. For example, the duplicate subscriber error returned two differently worded responses.
	Is the site provided in any languages other than English, including languages the target audience would commonly use?	The application is offered in both English and Spanish, but we found that some words in the Spanish version are not translated. For example, an incomplete application is still listed as "incomplete" on the Spanish-language homepage.

Source: GAO review of U.S. Web Design System Principles and the U.S. Digital Services Playbook and evaluation of checklifeline.org. | GAO-21-235

Note: We scored each descriptor on a scale of 1 to 3. A score of 1 indicates that the site did not align with the descriptor; a score of 2 indicates that the site partially aligned with the descriptor; a score of 3 indicates that the site fully aligned with the descriptor. We averaged the scores of the descriptors for each characteristic to determine the overall evaluation. "Met" indicates that descriptors had an average score of 2.5 to 3; "partially met" indicates that the descriptors had an average score of 1.5 to 2.4; and "did not meet" indicates that the descriptors had an average score of 1 to 1.4.

Table 9: GAO Evaluation of the Lifeline Support Website against Selected Characteristics for Leading Federal Website Design

Selected Characteristic	Descriptors	GAO Evaluation of Lifelinesupport.org
Accuracy		**Partially Met**
	Is the information correct?	We found some inaccurate information on how to recertify. For example, the site says carriers recertify their customers, which is not accurate.
	Is the information provided consistent with corroborating information provided by the Federal Communications Commission (FCC), the Universal Service Administrative Company (USAC), carriers, or other publicly available information?	The site often directs consumers to submit documentation needed to prove eligibility for Lifeline to carriers, which is inconsistent with other information on the Lifeline National Verifier (Verifier).
	Is the information provided complete? Does it cover all information a user would need to know to proceed?	We could not locate key information about what the Verifier is or who is responsible for it. The site also does not include temporary rule changes FCC made in response to the Coronavirus Disease 2019 (COVID-19).
Clarity		**Partially Met**
	Did the page provide clear information?	Information on the Verifier appears separate from information on how to get Lifeline, which we determined may make it difficult for a consumer who is unfamiliar with Lifeline to understand that the Verifier is part of the application process.
	Was it clear that this is a government website?	The site resides at a ".org" domain and we had difficulty finding indicators that USAC is working on behalf of the United States government.

Selected Characteristic	Descriptors	GAO Evaluation of Lifelinesupport.org
	Was it clear what service the government is providing?	While the site is clear that Lifeline is a federal government program, we had difficulty finding indicators that USAC is providing the eligibility verification service on behalf of the government.
	Were we able to discern what steps a user was supposed to take next?	The site sometimes provided mixed messages on whether a consumer should go to the Verifier on their own or go to a carrier.
	Is the information provided responsive to the question or purpose of the page?	We did not identify information or pages that were unresponsive to the purpose of the page.
	Do users know where to go to get help?	We were able to identify a help page that lists multiple sources for assistance.
Ease of Use		**Met**
	Is the site easy to navigate?	We were able to easily navigate the site using the navigation page and page labels.
	Do pages contain links to key information or services such as frequently asked questions or help?	The site contained a help page, but it was not linked to internally from some other pages.
	Are links clearly identified and appropriately contextualized?	We were able to reasonably identify links and their context.
	Is the site easy to find, meaning an individual could easily find it using a navigation bar or search and would not need to trace back through a series of internal links to find it again?	The site generally came up in the results of the search engines we used.
	Does the site display the same on different devices and in commonly used browsers (Chrome, Safari, Edge, Firefox)?	We did not identify any issues with the display on different browsers or devices used.
Feedback		**Did Not Meet**
	Was there a clearly identified and functioning mechanism to provide feedback?	The site has a "website feedback" button, but we found that it may be difficult for some users to find.
	Is it easy to provide feedback (i.e. can individuals provide feedback on the site, or do they have to navigate to other sites or submit feedback through other means like mail, email, or phone)?	At the time of our evaluation, the feedback form did not work. FCC officials told us in November 2020 that they had resolved this issue, and we confirmed that the form was functional as of November 2020.
Understandability		**Partially Met**
	Did the site use easy-to-understand language?	The site sometimes used language we found to be complex.
	Was technical or complex terminology defined?	The site did not define some terms such as "benefit qualifying person."

Selected Characteristic	Descriptors	GAO Evaluation of Lifelinesupport.org
	Was the same language or terminology consistently used across all pages?	The site did not always use consistent language on how to get Lifeline. For example, on some pages the eligibility verification step was called "applying" and the step of getting service from a carrier was called "enrolling;" however, on other pages eligibility verification was called "qualifying" and getting service from a carrier was called "signing up."
	Is the site provided in any languages other than English, including languages the target audience would commonly use?	We could not locate a non-English option for the site.

Source: GAO review of U.S. Web Design System Principles and the U.S. Digital Services Playbook and evaluation of Lifelinesupport.org. | GAO-21-235

Note: We scored each descriptor on a scale of 1 to 3. A score of 1 indicates that the site did not align with the descriptor; a score of 2 indicates that the site partially aligned with the descriptor; a score of 3 indicates that the site fully aligned with the descriptor. We averaged the scores of the descriptors for each characteristic to determine the overall evaluation. "Met" indicates that descriptors had an average score of 2.5 to 3; "partially met" indicates that the descriptors had an average score of 1.5 to 2.4; and "did not meet" indicates that the descriptors had an average score of 1 to 1.4.

Appendix IV: Comments from the Federal Communications Commission

![Federal Communications Commission seal]

Federal Communications Commission
Washington, DC 20554

January 13, 2021

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

Dear Director Von Ah:

Thank you for the opportunity to review GAO's draft report, "FCC Has Implemented the Lifeline National Verifier, but Should Improve Consumer Awareness and Experience." The Federal Communications Commission (the "FCC" or "Commission") is committed to closing the digital divide and bringing digital opportunity to all Americans. The FCC's Lifeline program, and the Lifeline National Eligibility Verifier (the "National Verifier") through which low-income consumers now apply for the program, can help do just that. We appreciate your recommendations as we continue to enhance the National Verifier in support of the FCC's mission.

In the *2016 Lifeline Order*, the FCC directed the Universal Service Administrative Company ("USAC") to establish and operate the National Verifier to further the Commission's objectives of preventing waste, fraud, and abuse in the Lifeline program; lowering costs to the Universal Service Fund and Lifeline providers through administrative efficiencies; and better serving eligible beneficiaries by facilitating choice and improving the enrollment experience.[1] By implementing a uniform system for Lifeline eligibility verification with USAC as a neutral administrator, the FCC aimed to increase the integrity and improve the performance of the Lifeline program for the benefit of all Lifeline stakeholders. As GAO recognizes, the FCC has made significant progress in achieving these objectives through successful implementation of the National Verifier, which is now fully deployed nationwide following a multi-year rollout. However, GAO notes, and the FCC acknowledges, that there is room for continued improvement to optimize the National Verifier application experience for Lifeline consumers.

In the draft report, GAO makes six recommendations to help the Commission expand consumer awareness of the National Verifier and improve the consumer experience. GAO's recommendations include: (1) developing and implementing a comprehensive consumer education plan for the National Verifier that better aligns with certain key practices; (2) providing Tribal organizations with more targeted information and tools, such as access to the National Verifier, so they can assist Tribal residents with Lifeline applications; (3) identifying additional performance measures to track the National Verifier's progress in

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[1] *See Lifeline and Link Up Reform and Modernization et al.*, Third Report and Order, Further Report and Order, and Order on Reconsideration, 31 FCC Rcd 3962, 4007, para. 128 (2016) (*2016 Lifeline Order*).

delivering value to consumers; (4) soliciting feedback on consumers' experience with the National Verifier and using that information to improve the manual review process; (5) ensuring that National Verifier-related webpages more fully align with characteristics for leading federal website design, including that they are accurate, clear, understandable, easy to use, and contain a mechanism for users to provide feedback; and (6) seeking appropriate approvals to use a ".gov" domain for the National Verifier's online application, checklifeline.org, and if denied, submitting it for inclusion on GSA's list of exceptions for federal government websites. We respond and provide a plan to address each recommendation below.

   Consumer Education Planning. The rollout of the National Verifier represented a paradigm shift in how consumers confirm their eligibility for the Lifeline program. Historically, Lifeline service providers were responsible for verifying the eligibility of potential Lifeline subscribers applying for the program. As the National Verifier was rolled out, however, USAC generally took on this responsibility. Thus, until recently when the National Verifier was fully launched everywhere, consumers could apply either through the patchwork of legacy processes or the National Verifier depending on where they lived. This phased approach was crucial to a smooth transition to a new system but also made it somewhat challenging to educate consumers regarding application requirements due to state-by-state variations while the National Verifier was put in place. Now that the National Verifier is fully deployed, USAC has oversight of the application process in all 56 states and territories.

   USAC takes its consumer education role very seriously and uses a variety of communication methods to convey information about the Lifeline program and the National Verifier to Lifeline stakeholders. These methods include monthly webinars and newsletters to ensure stakeholders are aware of program changes and understand their roles and responsibilities relative to the National Verifier, and email bulletins and training sessions to communicate program updates and timelines on a more frequent or as needed basis. Additionally, USAC conducts monthly meetings with industry associations and other groups that regularly interact with Lifeline consumers to help improve the participant experience. USAC's interactions with stakeholders provide valuable opportunities not only to share information, but also to gather feedback about the National Verifier. For example, USAC may learn about areas where consumers could benefit from additional assistance with the online application during a training session and then make changes to content or processes to address those situations.

   As GAO notes, USAC has been very engaged in consumer education initiatives in 2020, particularly in light of the coronavirus pandemic. Throughout the year, USAC conducted consumer advocate trainings about the Lifeline program and the National Verifier for a variety of stakeholder groups, including agencies that administer qualifying programs for Lifeline like the Centers for Medicare and Medicaid Services and consumer advocate organizations like NASUCA.[2] USAC also created a State/Federal partners webpage with dedicated resources for state and federal agency partners[3] and developed a customizable brochure in consultation with state public utility commissions to enable those organizations to help spread awareness of the

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[2] NASUCA, the National Association of State Utility Consumer Advocates, is an association of consumer advocates who are designated by the laws of their respective state, territory, or other jurisdiction to represent the interests of utility consumers before state and federal regulators and in the courts.

[3] The toolkit for state and federal partners can be found at: https://www.usac.org/lifeline/learn/lifeline-resources-for-state-and-federal-partners/.

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Lifeline program among potential subscribers.[4] To further strengthen these partnerships, USAC will start issuing a quarterly newsletter to provide regular updates about the Lifeline program and the National Verifier to its state and federal partners in the first quarter of 2021.

USAC also intends to develop a more comprehensive communications plan in the first quarter that better aligns its existing consumer education activities with the best practices for consumer education planning identified in the draft report. For example, as part of this plan, USAC will define the goals and objectives that it needs to achieve to fulfill its consumer education responsibility related to the National Verifier. USAC also plans to identify metrics to measure its progress in educating consumers (e.g., tracking open rates for materials distributed electronically as part of its outreach initiatives). USAC will look to further refine the communications plan consistent with applicable key practices throughout 2021.

In the meantime, Lifeline service providers remain obligated under federal law to educate consumers about the Lifeline program.[5] Given that the majority of Lifeline applicants opt to apply for the program with the assistance of a service provider, which brings with it the convenience of being able to sign up and enroll for service at the same time, Lifeline service providers share the important obligation of helping consumers understand the program and National Verifier processes.

Tribal Outreach and Informational Tools. Although Tribal stakeholders are included in all USAC outreach, USAC engaged in a variety of Lifeline and National Verifier outreach initiatives throughout 2020 specifically targeting Tribal audiences. For instance, USAC provided several presentations on the Lifeline program and the enhanced Tribal discount to Tribal advocates, leveraging partnerships with other federal agencies such as the Bureau of Indian Affairs. USAC also refined its Tribal Flyer, which contains information about how Tribal consumers can apply and manage their Lifeline benefit, to ensure the information is more helpful to Tribal consumers.[6] Additionally, USAC created a Tribal Toolkit for Tribal advocates with educational resources about the Lifeline program that they can use to promote awareness of the program and the National Verifier among Tribal consumers.[7]

The FCC and USAC agree with GAO that better communication and additional tools will allow Tribal governments and organizations to more effectively assist Tribal members in accessing the Lifeline program. As GAO observes, Lifeline support is critical to increasing access to affordable communications services on Tribal lands, and Tribal governments and organizations are able to promote Lifeline to Tribal consumers in ways and through venues that USAC cannot. In 2021, USAC plans to expand its Tribal outreach to include a Tribal-specific Lifeline webinar each quarter. USAC will work closely with the FCC's Office of Native Affairs and Policy and USAC's Tribal liaison to plan these webinars and will make it a priority to clarify

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[4] The brochure can be found at: https://www.usac.org/wp-content/uploads/lifeline/documents/handouts/State-puc-brochure.pdf.

[5] *See* 47 U.S.C. § 214(e)(1)(B); 47 CFR § 54.405(b), (c).

[6] The Tribal Flyer can be found at: https://www.lifelinesupport.org/wp-content/uploads/lifeline/documents/Tribal-Flyer.pdf.

[7] The Tribal Toolkit can be found at: https://www.lifelinesupport.org/wp-content/uploads/lifeline/documents/Tribal-Toolkit.pdf.

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in its messaging how Tribal governments and organizations can assist residents of Tribal lands with the application process.

The FCC and USAC will also provide Tribal organizations with enhanced access to the National Verifier's online application system so they can take a more hands-on role in helping Tribal consumers complete their Lifeline applications. Taking this step requires system changes, targeted outreach, and training for those who will be authorized to use the system, and USAC plans to prioritize this project in 2021.

Measuring Value to Consumers. As GAO notes, USAC uses a variety of measures to monitor the National Verifier's performance, including the percentage of applications requiring manual review, the number of repeat cases, the average processing time for applications, and both the actual and projected volumes of applicants. While GAO suggests that none of these metrics enable the FCC and USAC to track the National Verifier's progress in delivering value to consumers, we respectfully disagree. Delivering value to consumers includes not only increased choice through greater competition, but also increased access to modern, high-quality services. Reducing the percentage of applications that require manual review, minimizing repeat application attempts, and improving application processing time all make it easier for consumers to access Lifeline-supported services. In addition to measuring National Verifier performance, the FCC also evaluates annually what qualifies as Lifeline-supported service and by rule makes adjustments as needed to the minimum levels of service providers are required to offer to qualify as a Lifeline service so as to ensure that these offerings keep pace with evolving consumer needs for modern, high-quality services.

That said, the *2016 Lifeline Order* required USAC to hire an outside vendor to conduct a program evaluation of the Lifeline program to examine the extent to which the FCC is achieving its goals for the program.[8] At the FCC's direction, USAC asked the vendor to assess the impact of the National Verifier on the Lifeline program, and to recommend additional performance measures we can use to monitor the National Verifier's progress toward the ultimate outcome of delivering value to consumers. USAC provided the vendor's program evaluation findings to the FCC on December 28, 2020, which are under review. The results of the program evaluation, including any additional performance measures the FCC adopts for the National Verifier, will be incorporated, as appropriate, into the forthcoming State of the Lifeline Marketplace Report that the FCC's Wireline Competition Bureau will submit to the Commission in June 2021.[9]

Improvements to the Manual Review Process. The manual review process refers to situations where consumers are required to submit documentation to USAC for review because their eligibility cannot be verified through the automated system checks the National Verifier has in place. Because one of the primary objectives of the National Verifier is to improve the application experience for consumers, the FCC and USAC are continually looking for ways to make the process easier.

According to GAO, challenges applicants may face during the manual review process include difficulty in obtaining the correct documentation to prove eligibility and the length of

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[8] *See 2016 Lifeline Order*, 31 FCC Rcd at 4112, para. 409.

[9] *See id.*

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time associated with manual reviews.[10] The FCC and USAC are constantly looking at ways to
address these concerns, including leveraging automated data sources as much as possible and
designing documentation criteria to facilitate the verification of eligible applicants without
approving ineligible applicants for the benefit. Making the application process more consumer
friendly, however, must be balanced with the FCC's objective of preventing waste, fraud, and
abuse in the Lifeline program. Manual review will always be a necessary aspect of the
application process so that USAC has a way to confirm eligibility for consumers who cannot be
verified through automated connections and ensure that the Lifeline program is managed in a
fiscally responsible way. Manual review is also critical for Privacy Act compliance, which
requires that consumers who are denied federal benefits based on computer matching programs
be given an opportunity to contest that determination through a dispute resolution process.[11]

      One of the most effective ways to address potential challenges to the manual review
process is for the FCC and USAC to continue prioritizing automated eligibility verification for
the National Verifier so that the application process is as easy and fast as possible for consumers.
Currently, the National Verifier has direct connections to two federal agencies for nationwide
eligibility data—the Centers for Medicare and Medicaid Services and the Department of Housing
and Urban Development. In addition, there are now 22 states and territories where the National
Verifier has access to state databases for purposes of automated eligibility verification for the
federal Lifeline program.[12] USAC and the FCC remain willing to work with any state or federal
agency that is interested in a computer matching agreement, as our automated eligibility pass rate
continues to improve as we add new connections the National Verifier. At the time of GAO's
review, application data through June 2020 was the most recent data available, so the pass rates
cited in the draft report are dated. With its existing connections as of January 2021, the National
Verifier is automatically verifying the eligibility of up to 88% of Lifeline applicants in states
where it has access to both state and federal database connections, and on average about 71% of
applicants nationwide.

      The FCC and USAC also recognize that access to quality information to drive informed
decision making is key to solving potential challenges with the manual review process. USAC
will continue to rely on feedback it receives through existing channels to provide insight into
how it can improve the application process for consumers. For instance, in addition to collecting
feedback from consumers who contact the Lifeline Support Center for assistance with their
Lifeline applications, USAC relies on input from organizations that regularly interact with
Lifeline consumers, like those GAO interviewed in preparing the draft report (i.e., Lifeline
service providers, industry associations, and state and federal agency staff). USAC will also
continue to monitor performance metrics, such as the frequency of manual reviews, repeat
application attempts, and processing time, all of which provide insight into various aspects of the

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[10] Although manual review times during regular business hours for the Lifeline Support Center are completed in a
matter of minutes, documents submitted outside of regular business hours take longer to review. A consumer may
also take multiple attempts before submitting documentation that satisfies program criteria, which falls under the
"repeat cases" metric that USAC monitors.

[11] *See* 5 U.S.C. § 552a(p).

[12] This total includes Oregon and Texas, where our federal-state partnerships enable the National Verifier to
leverage both states' automated connections for purposes of eligibility verification for the federal Lifeline program.

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manual review process.[13] In addition, USAC will proactively solicit feedback directly from consumers to ensure it has the most complete information possible. USAC will use this feedback not only to improve the manual review process, but also to inform the consumer education initiatives discussed above. USAC will also solicit feedback from Tribal stakeholders, which will help USAC better understand the unique challenges consumers on Tribal lands face in applying for the program and modify National Verifier processes and outreach strategies appropriately.

The National Verifier's Online Presence. The Commission's objective to improve the application process for consumers also means that the FCC and USAC are continually evaluating potential enhancements to the online application, the checklifeline.org website, and USAC's consumer-facing support website, lifelinesupport.org. As GAO observes, there are ways both websites could more fully align with selected characteristics for leading federal website design, and USAC has already begun implementing changes that would address some of the potential challenges GAO identified in the draft report.[14]

Recently, USAC made changes to the online application as part of ongoing updates designed to make sure it is clear and easy for consumers to use. Consumers can now access their Lifeline benefit enrollment details and easily search for applications they previously created. Additionally, USAC made system changes to enable consumers to see if they qualify for enhanced Tribal support as soon as their online application is approved, rather than having to wait until they enroll for Lifeline service with a service provider. Going forward, USAC plans to update the online application so that it more clearly informs consumers about the multiple permitted methods of submitting documentation for review, including via mail. USAC also plans to update the online application to include more detail about the meaning of specific application error messages and tips for how to resolve them. USAC is also reviewing the various notifications that it provides consumers in connection with the National Verifier application process (e.g., annual recertification reminders, requests for additional eligibility or identity documentation, etc.) to clarify program requirements and messaging.

GAO also points out that when it conducted its evaluation, there were discrete webpages where lifelinesupport.org still referenced the legacy application process or sent mixed messages about whether consumers should apply for Lifeline through the National Verifier or with their service provider. Now that the National Verifier has been fully launched everywhere, USAC is updating lifelinesupport.org to ensure that it is accurate, clear, and accessible. Additionally, USAC recently took steps to make sure that the consumer feedback mechanism was easy to find and working properly. GAO observed in the draft report that the link wasn't functioning correctly at the time it conducted its review, but acknowledged that USAC had corrected this issue as of November 2020. USAC is also working to revamp the consumer educational videos available on lifelinesupport.org, which are designed to assist consumers as they navigate the

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[13] Although GAO suggests that only one of these metrics – processing time – provides information about the manual review process, understanding how frequently manual reviews are required and how often it takes consumers multiple attempts to complete the process is also valuable to the FCC and USAC in assessing whether the manual review process is working efficiently.

[14] GAO notes that its evaluation is current as of July 2020, and that recent or forthcoming updates to the websites may address issues identified in the draft report.

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National Verifier application process. These changes are scheduled for completion in early 2021.

Together, these actions will better ensure that National Verifier-related webpages more fully align with selected characteristics for leading federal website design and improve the consumer experience.

The National Verifier Domain. As a continuation of our efforts to optimize the National Verifier consumer experience, the FCC and USAC plan to convert the online application, checklifeline.org, to a ".gov" domain. GAO indicates in the draft report that consumers may be uncomfortable providing sensitive information to a website that does not use a ".gov" domain. Although the FCC and USAC have not received any feedback from consumers indicating they have concerns about the legitimacy or security of checklifeline.org, we have no reason to dispute that a ".gov" domain would more clearly indicate that the National Verifier provides a government service. GAO encourages the FCC to apply to GSA for a decision on whether it is appropriate for the National Verifier to have a ".gov" domain and, depending on the determination, convert the website to a ".gov" domain or submit it for inclusion on GSA's list of exceptions for federal government websites.

As GAO notes, the FCC has already initiated conversations with GSA about obtaining a ".gov" domain, and GSA confirmed in December 2020 that the FCC can convert the online application to a ".gov" domain without using the application process GAO describes if we simply make the National Verifier a subdomain of "fcc.gov," which is the path we intend to take. The FCC is actively working with USAC to develop a timeline for completing this project. The FCC and USAC also plan to explore ways to ensure that the new website appears in online search engine results when consumers use common terms to describe the Lifeline application, consistent with the selected characteristics for leading federal website design identified in the draft report.

The FCC and USAC believe that the actions described in this letter will address each of GAO's recommendations, and ultimately result in greater awareness and a better experience for low-income consumers who use the National Verifier to access affordable communications services that are critical to participate in today's society. Thank you for the opportunity to review GAO's recommendations. We look forward to working with GAO in the future.

Sincerely,

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Managing Director
Office of Managing Director

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Appendix V: GAO Contact and Staff Acknowledgments

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Staff Acknowledgments	In addition to the contact named above, Sally Moino (Assistant Director), Katherine Raymond (Analyst in Charge), David Bruno, Josh Garties, Benjamin Licht, Josh Ormond, Anna Maria Ortiz, Kelly Rubin, Jeanette Soares, Andrew Stavisky, Lisa Van Arsdale, Sarah Veale, and Michelle Weathers made key contributions to this report. Seto Bagdoyan, Cheryl Peterson, Kathleen Sharkey, and Janet Temko-Blinder also made contributions to this report.