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California LifeLine Third Party Administrator

Presentation to the Administrative Committee

March 21, 2022



TPA Recent Enhancements 12/8/2021 – 3/14/2022

Subscriber Communications Experience Project Deliverables

California LifeLine Public Website

- Enhanced sorting and comparison functionality for LifeLine plans offered by Service Providers
- Adult Parolee ID Card added as an eligible identity document
- Affordable Connectivity Program (ACP) banner replaced the Emergency Broadband Benefit (EBB) banner
- Revised content for the "Upload Identity Documents" and the Online Application and Renewal methods to improve readability for comprehension
- FAQ regarding Program-observed holidays added and linked to the Contact Us page

California LifeLine Subscriber Mail Communications

- Renewal Qualified Initial Approval Letter updated to reflect renewal process improvements

TPA Completed Initiatives 12/8/2021 – 3/14/2022

Service Provider Support and Enhancements

Enrollment Intake Modernization

- SPIA Phase 2 - The existing Service Provider Intake API (SPIA) was expanded to improve the efficiency and effectiveness of the California LifeLine Program by creating a new, real-time intake channel process for CA LifeLine enrollment applications for wireless and wireline Service Providers in their transmission of subscribers' metadata
 - Current Service Provider adoption:
 - ✓ 1 Service Provider Tested & Certified, plus went live on SPIA 3/14
 - ✓ 1 additional Service Provider planned to complete Testing & Certification, plus go-live the week of 3/21
 - ✓ CPUC/TPA is hopeful that more Service Providers will adopt SPIA and go-live in the next round of SPIA Testing & Certification
 - The benefits SPIA delivers to improving Subscribers' experience include:
 - Real Time Check for Participant's LifeLine Status
 - Real Time Renewal status check, including for prospective transfer participants
 - Real time IEH Worksheet Indicator
 - Real time subscriber transfer completion

TPA Completed Initiatives 12/8/2021 – 3/14/2022

Service Provider Support and Enhancements

Enrollment Intake Modernization Continued

- The benefits SPIA delivers to improving Subscribers' experience include (continued):
 - Certification and Renewal Intake Channel
 - Single API for submission of new applications, transfers, and renewals
 - Real Time External Database Matching Program eligibility check
 - Real Time New Application Metadata Submission
 - Real Time Application status check
 - Real Time Identity Documentation Required Indicator
 - Real Time Reconnect functionality
 - Real Time Method for submission of eligibility, IEH and IDV documentation
 - Form review decisions in near real time* w/o Daily return file process required
 - Service Provider saved from maintaining a codebase for a callback API and Check Form Print Status
 - Service Provider saved from inserting consumer metadata into form
 - Service Provider saved from converting consumer-provided images to PDF format

TPA Completed Initiatives 12/8/2021 – 3/14/2022

Service Provider Support and Enhancements

Business Requirements Documents (BRD) for a Standalone Independent Economic Household (IEH) Process

- Requirements for a standalone IEH process have been gathered and compiled into BRDs
- A standalone IEH process will decouple the issuance of IEH worksheets from the annual renewal process thereby reducing the complexity for LifeLine subscribers entering their annual renewal process
- 25% of the population of subscribers were unable to enter the preemptive CalFresh recertification process because these customers share the same address with other LifeLine subscribers in our database. The benefits of the standalone IEH would mean reduced costs to the Program since it will increase the number of subscribers who will be found in the CalFresh Confirm hub. This saves subscribers the hassle of the traditional renewal process, and the Program printing and administrative costs
- Better stewardship of the California LifeLine Fund will be served when a subscriber changes their home address, the need for IEH is evaluate at that time, and the process initiated as necessary at that time

Service Providers' Responses to USAC Payment Quality Audits (PQA)

- The TPA has assisted Service Providers with documentation required to respond to USAC's PQA requests

TPA Completed Initiatives 12/8/2021 – 3/14/2022

Service Provider Support and Enhancements

LexisNexis® (LxNx) timeouts Impacting DAP/SPIA real time transactions

- During the application and renewal form review processes the TPA must verify participants' identity. The TPA utilizes LexisNexis® Identity Verification and Authentication (LxNx) via an automated Application Programming Interface (API). The timeout of an API call is the total time available for a request to be processed and answered. When a request is received but the API does not send a response within the available time, the call is aborted, and an error (504) is returned. Currently, if the LxNx API check times out there is an impact on real-time DAP/SPIA API calls submitted by LifeLine Service Providers
- The LxNx timeout was changed so the overall timeout of DAP/SPIA API calls encompasses all other activities and associated timeouts. The change is to reduce the timeout for LxNx along with retry and to allow DAP/SPIA transactions to move forward without timeouts

ImageX Improvement

- ImageX is a weekly process for the TPA to deliver images of recently approved LifeLine application and renewal forms to Service Providers
- The process was modified to remediate scenarios for which incomplete imageX files were created for Service Providers

Revised Weekly Active Subscriber Reporting to USAC

- USAC asked the TPA to include Service Address line 2 to the report. The weekly files do not contain Service Address line 2, whereas Service Address line 2 is included in the monthly USAC True Up reports. USAC believes this change to the weekly reports may alleviate issues service providers have encountered when enrolling California LifeLine subscribers in the federal Affordable Connectivity Program (ACP)

TPA Completed Initiatives 12/8/2021 – 3/14/2022

TPA Operation Center Enhancements

Updated TPA system review screens with the 2022 Federal Poverty Guidelines

TPA System Platform Upgrade

- The TPA completed a full upgrade of the software underlying the TPA's California LifeLine computer system platform. This upgrade enhances the stability of the platform and ensures continuing vendor support of the software

The TPA's system was modified to make "Call Reason" and "Call Sub Reason" fields (when applicable) required fields

- This change ensures that call center agents select a call reasons for all inbound calls from LifeLine participants

TPA Completed Initiatives 12/8/2021 – 3/14/2022

TPA Operation Center Enhancements

Automatic CalFresh Confirm Checks for All Electronically-submitted New Enrollment Applications

- On December 13, 2021, at the CPUC's direction, the TPA began checking 100% of new enrollment applicants for Program eligibility using the CalFresh Confirm hub
 - 81.2% of applicants who selected CalFresh as their qualifying program were approved after CalFresh Confirm "PASS" outcomes between December 12 and February 7
 - This change automated the CalFresh Confirm checks for all electronically submitted new enrollment applications (SPIA, DAP and public website intake methods)
 - Reviewers execute manual CalFresh Confirm checks for new enrollment applications submitted by mail
 - Reviewers execute manual CalFresh Confirm re-checks for new enrollment applications when the automated check fails
- Coming up on Slide 10 & 11 are the details and results of the Preemptive Recertifications that began on November 14, 2021, as mentioned during the prior UTLS Administrative Committee quarterly meeting report

TPA Upcoming Initiatives

Subscriber Communications Experience Project Deliverables

- Updating Renewal Qualified Secondary Approval and Identity Authorization Letters to reflect renewal process improvements
- Updating reminder postcard templates for improved readability and comprehension
- Updating new enrollment application and renewal forms for improved readability and comprehension to match new process enhancements
- Revising the Office of State Publishing (OSP)'s file with National Change of Address results for reminder postcards so the file may be ingested by the TPA's system and provide updates to Service Providers
- Updating the Independent Economic Household (IEH) Worksheet to align the form to a standalone process

Implementation of a Standalone IEH process

- Subscribers sharing an address with another LifeLine subscriber will be mailed or directed to website to fill out IEH Worksheet when they change their address
- As a standalone process, LifeLine subscribers will not be mailed or directed to website to fill out a IEH worksheet during the renewal process

Preemptive Renewal - CalFresh

The California LifeLine Program is the first external user of the California Department of Social Services CalFresh Confirm hub

Beginning November 12, the California LifeLine Administrator started preemptive recertifications utilizing the CalFresh Confirm hub

During the preemptive recertification process, subscribers' renewal processes were deferred:

- If data quality issues prevented a CalFresh Confirm check, or
- If the TPA's system identified the need for an Independent Economic Household (IEH) worksheet or the Identity Authentication process, or
- If the CalFresh Confirm check result is "not a match"

What does "deferral" of the renewal processes mean?

- The renewal processes do not start
- Anniversary dates for deferred subscribers are moved at least 30 days into the future

No California LifeLine subscribers were removed from the Program due to CalFresh Confirm "not a match" results during the preemptive recertification process

When the CalFresh Confirm check result was "PASS", subscribers were recertified for 1 year from their current anniversary dates

Notifications of the renewal approvals continued to occur on subscribers' anniversary dates

Preemptive Renewal - CalFresh

For the period of November 11, 2021, through March 14, 2022,
281,694 subscribers have been pre-emptively renewed as a result of CalFresh Confirm eligibility checks

- Wireless subscribers – 220,709
 - Wireline subscribers – 60,985
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- ✓ ~300K qualified subscribers now have peace of mind that they will remain with their benefit for another year without the burden to interact in a traditional renewal process
 - ✓ ~53% were preemptively recertified of the ~532K total subscribers whose anniversary date would have entered them into a renewal process
 - ✓ Efficient use of Program funds for the qualified subscribers not required to enter the interactive renewal process

Upcoming Anticipated Renewal Resumption

Unless FCC announces an 11th extension, the Renewal Freeze lifts April 1, 2022

- TPA is ready with a plan that addresses all the renewal process improvements and risks
- The Renewal Catch-Up Subscriber Pool plus natural occurring First-Time Anniversary Subscribers to be processed from April through July = ~724K

Reports Appendix

- Program Participation – Active LifeLine Subscribers
- Wireless: Response & Approval Rates – All Form Types
- Wireline: Response & Approval Rates – All Form Types
- Top 5 Denial Reasons
- Subscriber Counts by Service Provider (Top 5)
- Enrollment Eligibility Methods – Program versus Income Qualification
- Enrollment Eligibility Methods – Breakdown by Program
- Form Intake Channel Volumes
- Call Volumes – English & Spanish
- Call Volumes – Other Languages
- Call Reasons

Program Participation – Active LifeLine Subscribers

Current: Total Number of Active LifeLine Subscribers as of March 1, 2022

- Wireless: 983,764
- Wireline: 224,163
- Total: 1,207,927

December 2021 Meeting: Total Number of Enrolled Subscribers as of November 30, 2021

- Wireless: 1,007,704
- Wireline: 231,840
- Total: 1,239,544

Wireless: Response & Approval Rates – All Form Types

Month Year	# Total	# Responded	# Approved	% Responded	% Approved
Totals	1,330,032	1,231,217	1,203,462	92.6%	97.7%
Mar 2021	61,519	56,812	55,853	92.3%	98.3%
Apr 2021	59,449	54,674	53,561	92.0%	98.0%
May 2021	62,792	56,928	55,515	90.7%	97.5%
Jun 2021	85,128	78,049	76,215	91.7%	97.7%
Jul 2021	93,297	83,842	82,466	89.9%	98.4%
Aug 2021	102,419	93,657	91,656	91.4%	97.9%
Sep 2021	98,190	90,627	87,154	92.3%	96.2%
Oct 2021	102,379	95,064	92,945	92.9%	97.8%
Nov 2021	196,965	188,733	186,521	95.8%	98.8%
Dec 2021	160,893	151,456	147,488	94.1%	97.4%
Jan 2022	140,782	128,702	124,948	91.4%	97.1%
Feb 2022	114,188	104,221	101,420	91.3%	97.3%

Avg SLA Days

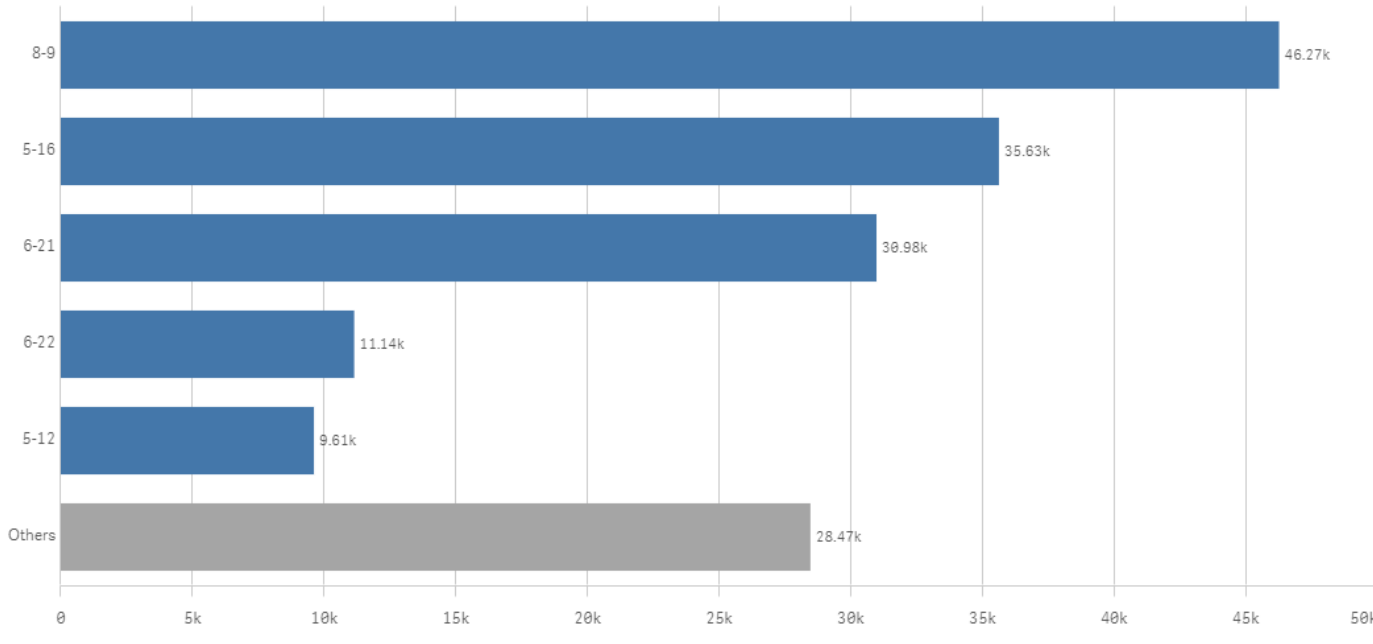
2.42 100.0%
% Compliance

Wireline: Response & Approval Rates – All Form Types

Month Year	# Total	# Responded	# Approved	% Responded	% Approved
Totals	84,536	72,529	70,337	85.8%	97.0%
Mar 2021	2,325	1,381	1,093	59.4%	79.1%
Apr 2021	2,480	1,317	1,033	53.1%	78.4%
May 2021	2,557	1,098	855	42.9%	77.9%
Jun 2021	2,365	1,117	869	47.2%	77.8%
Jul 2021	1,885	872	715	46.3%	82.0%
Aug 2021	1,949	900	779	46.2%	86.6%
Sep 2021	1,749	887	733	50.7%	82.6%
Oct 2021	1,687	790	629	46.8%	79.6%
Nov 2021	24,625	23,746	23,606	96.4%	99.4%
Dec 2021	23,777	22,883	22,738	96.2%	99.4%
Jan 2022	14,257	13,426	13,328	94.2%	99.3%
Feb 2022	3,695	3,125	3,026	84.6%	96.8%

Avg SLA Days
2.27 100.0%
 % Compliance

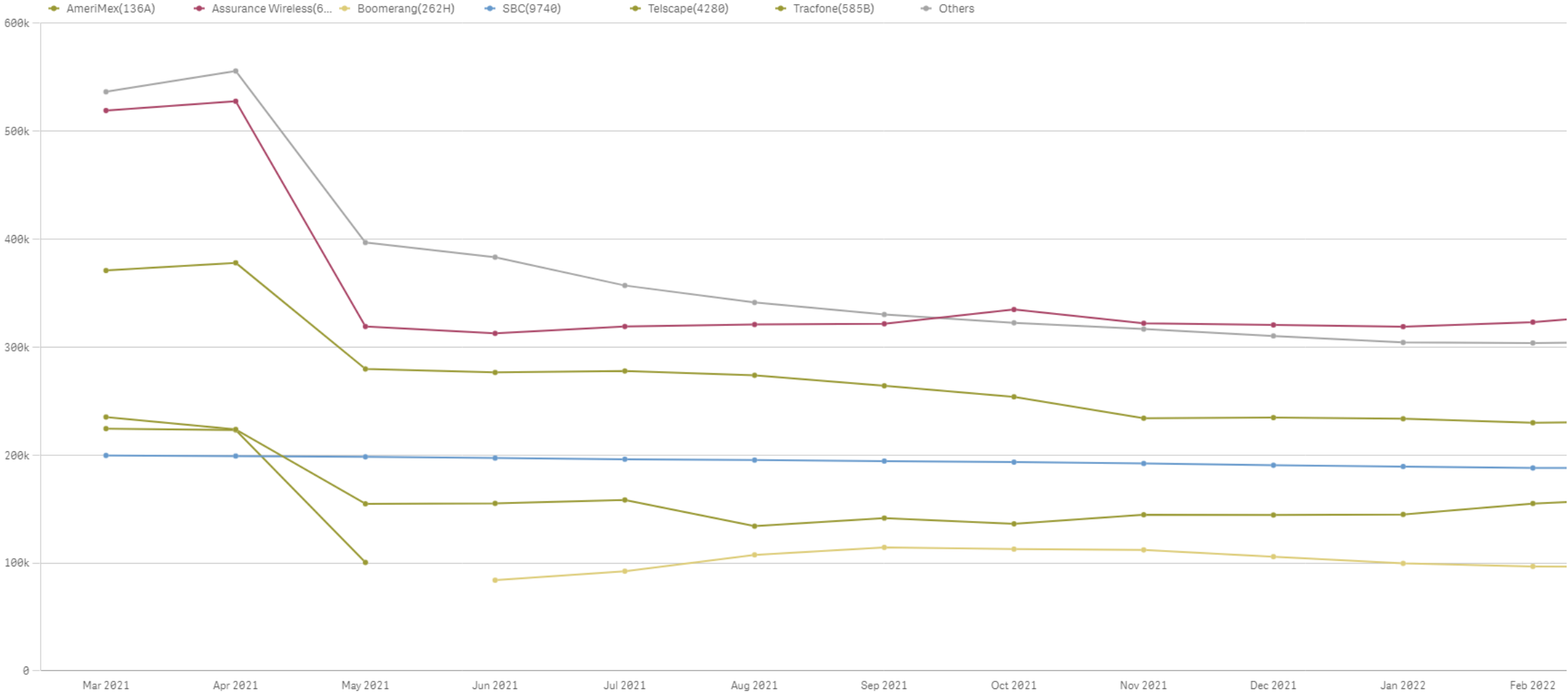
Top 5 Denial Reasons: March 2021- February 2022



Denial Code	Type	Form	Description
8-9	Hard Denial	Application	We do not have evidence that the Application Form was returned to us.
5-16	Hard Denial	Application	Applicant failed to return ID verification form and documentation (for IDV)
6-21	Correctible Denial	Application	We do not have evidence that the Application Form was returned to us.
6-22	Correctible Denial	Application	Documentation provided does not meet the eligibility guidelines.
5-12	Hard Denial	Application	An active phone number and service start date was not provided by the carrier within 30 days from receipt of status code 53

Subscriber Counts by Service Provider (Top 5)

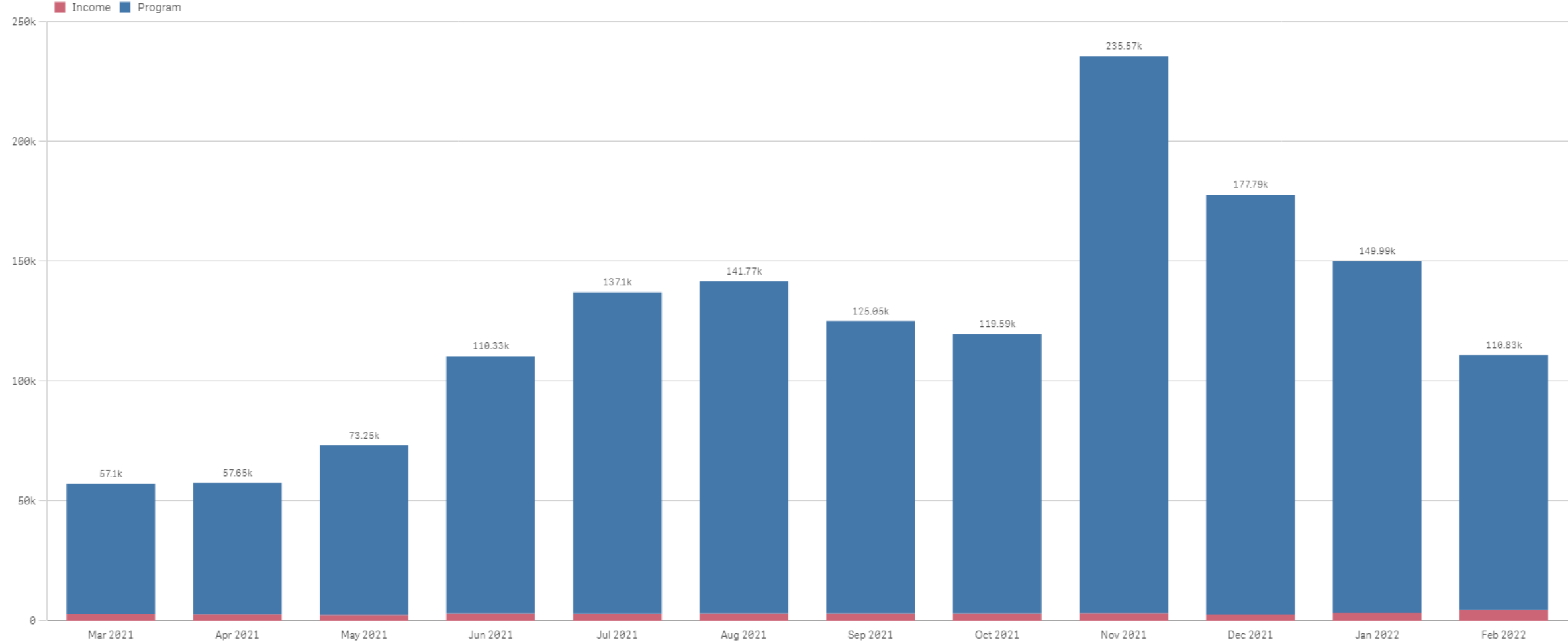
Application Summary by Service Provider (Service Terms)



Enrollment Eligibility Methods – Program versus Income Qualification

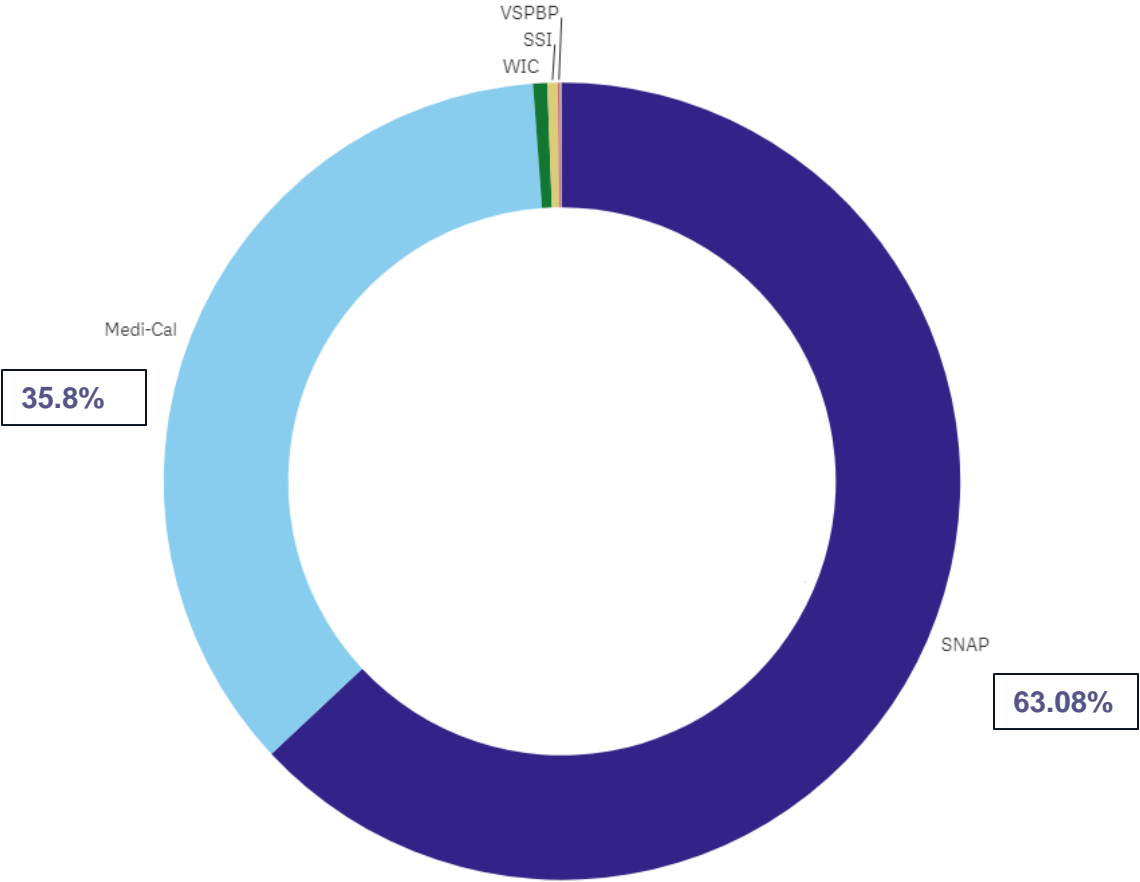
Enrollment by Income or Program

By Rolling 12 Months, Includes All Decisions

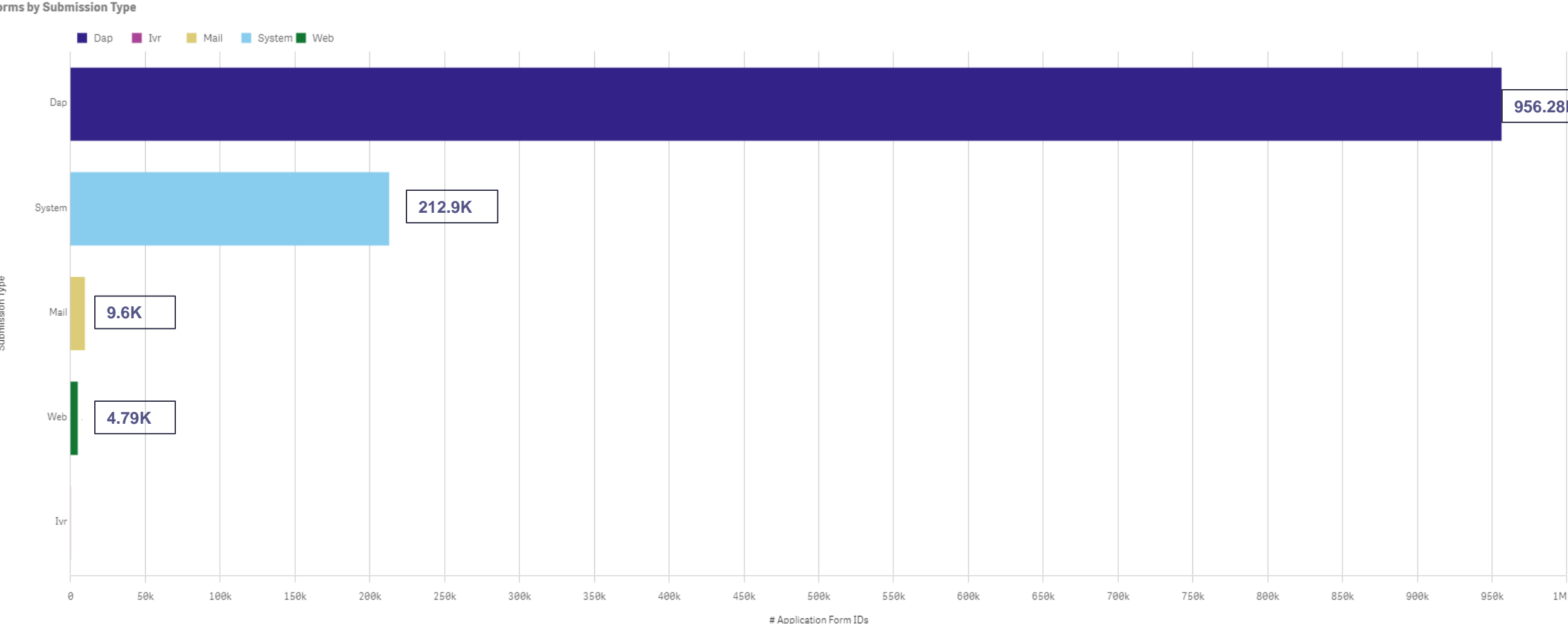


Service Term IDs

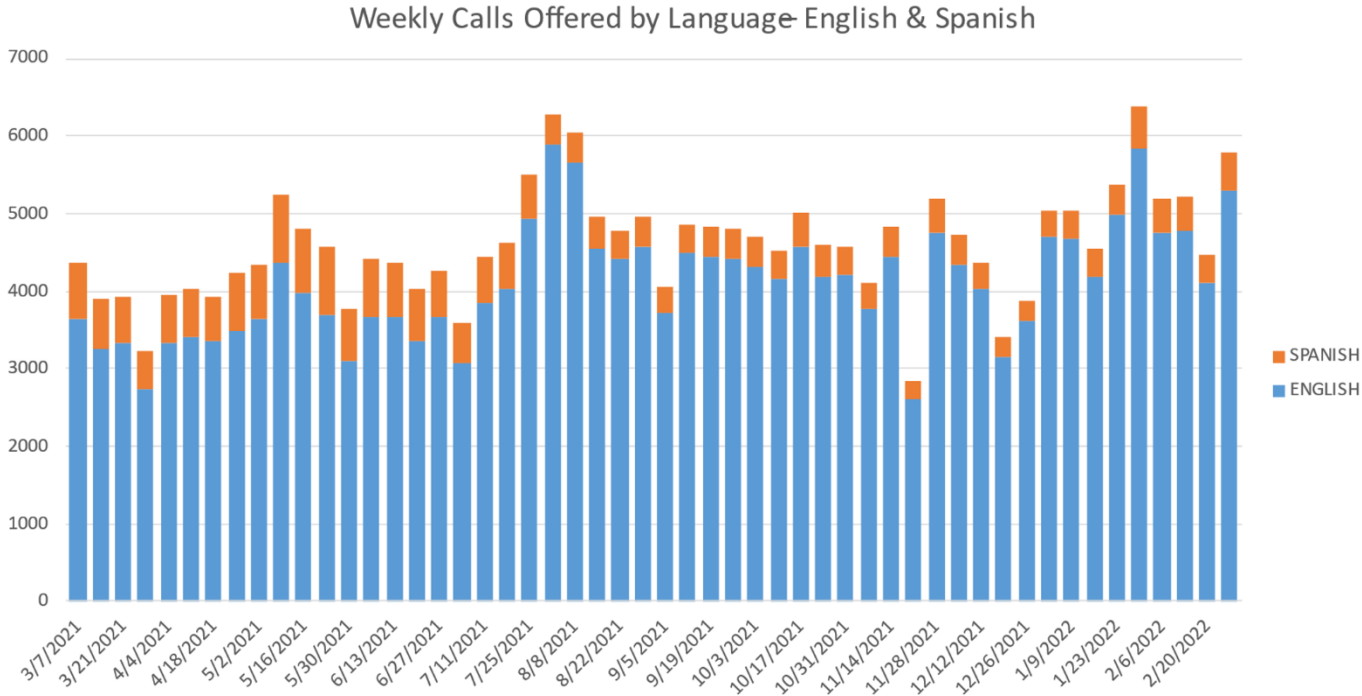
Enrollment Eligibility Methods



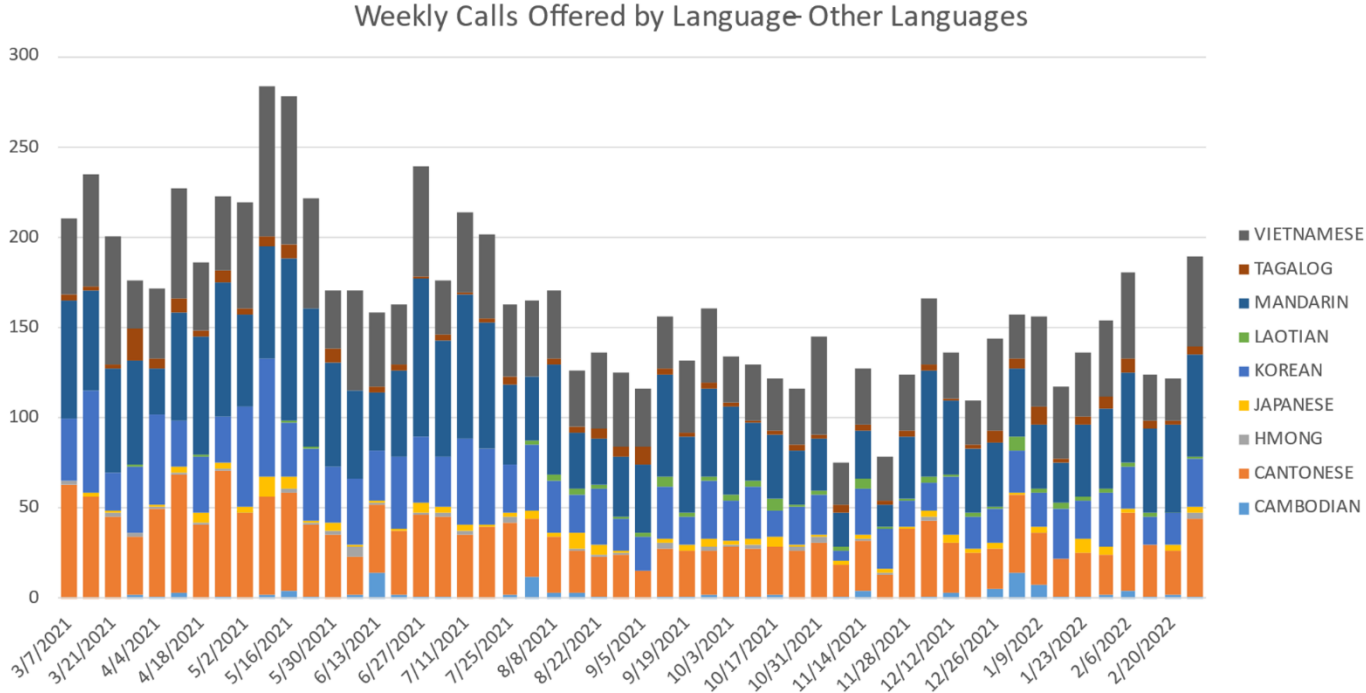
Form Intake Channel Volumes: January 2022 - February 2022



Call Volumes – English & Spanish



Call Volumes – Other Languages



Call Reasons

Percentages by Call Reason

