**FCC Lifeline Program for the Medicaid Population**

History

* Over the past 8 years, TracFone has developed relationships with 25 Managed Care Organization (MCO) partners in 37 states to access their databases with over 37.1 million Medicaid eligible individuals. These databases originate from 834 file from State Medicaid Departments.
* Since 2010, approximately 3 million Medicaid recipients have been enrolled into the Lifeline program through these partnerships.
* TracFone also has relationships with 19 states for access to databases to confirm program eligibility.
* Historically, the FCC has encouraged the use of databases in previous Lifeline Reform Orders.

Current Process

* When an individual applies, State Databases are initially checked and if not found or there is no state database, MCO databases are accessed.
* For MCO Databases approvals, the system generates the letterhead proof (Attachment 2), which is tied to the application. For State Databases, TracFone has connections with states in order to verify program eligibility.
* Such proof/connections are currently accepted by USAC under the existing process/system. USAC, however, requires eligibility documentation for the National Verifier to be issued by state or federal governmental entities.

Compliance

* To meet legal compliance, TracFone has Business Associate Agreements in place with each MCO. TracFone has also obtained the Soc2Type2, HIPAA and HITRUST Certifications.
* Everything is handled on HIPAA segmented servers and daily file exchanges are administered using encryption.
* SafeLink and health plan shall provide access to records upon the request of any regulators or reviewing bodies.

Our Request

* TracFone is requesting that USAC and the FCC keep the current approval verification process until the Medicaid CMS databases are fully integrated into the National Verifier.
* At a minimum, when an individual does not get verified through the checklifeline.org system during the automated process, TracFone should be permitted to ping the MCO Medicaid databases and submit as eligibility documentation the MCO letterhead for the National Verifier’s manual eligibility verification process.

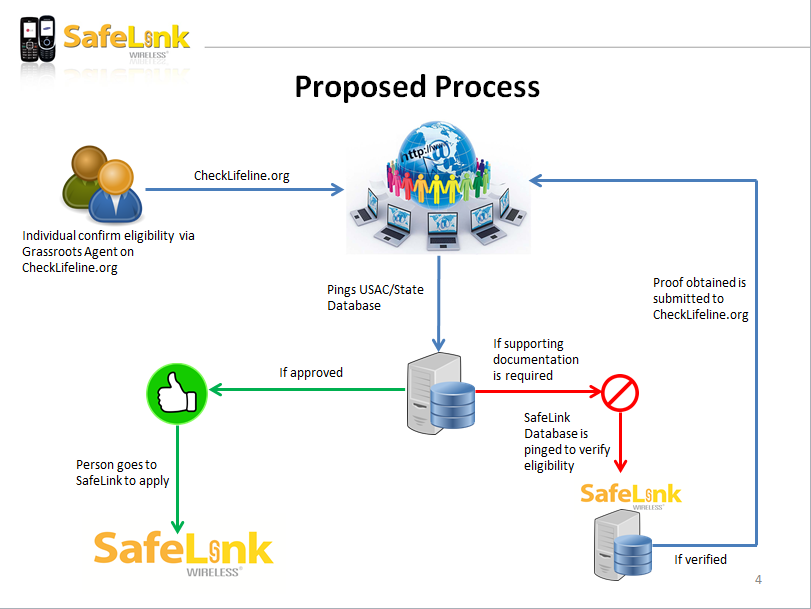
USAC/FCC Benefits

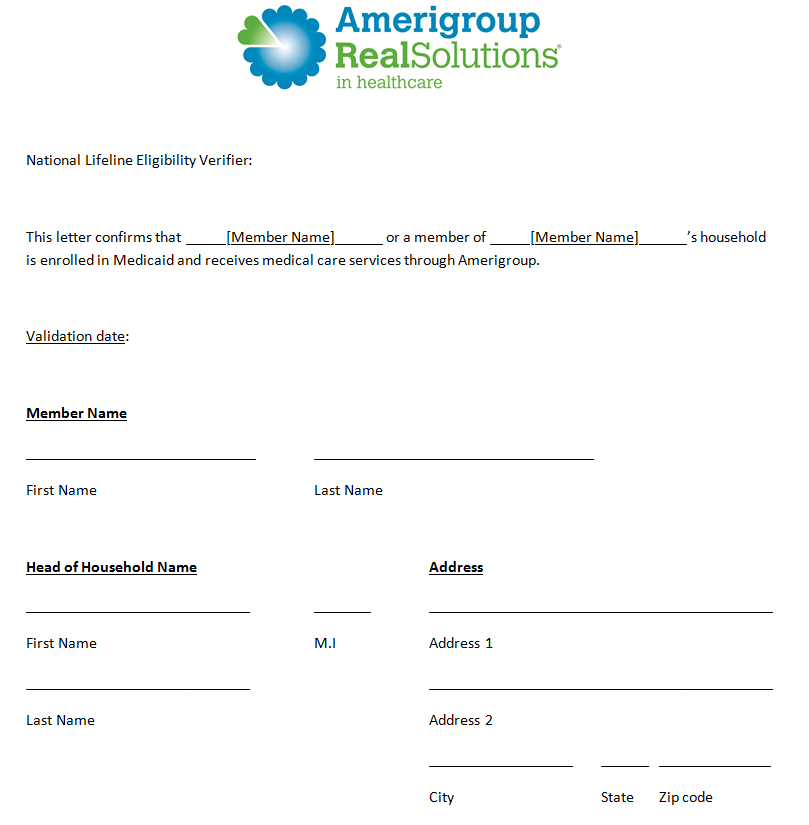
* More reliable data sources; TracFone will assist in providing up to date Medicaid verification from 834 file state Medicaid list. The MCO databases, while maintained by the MCO, are sourced directly from the state files.
* Minimize fraud, waste and abuse: the database-generated MCO letterhead proof is less susceptible to fraud and abuse as applicants cannot easily manipulate such documentation, unlike copies of a Medicaid card.
* Less escalations and use of Back Office Agents equates to cost savings.

Medicaid Recipients Benefits

* Having access to a “health phone” improves medical outcomes and cost; Medicaid recipient can call doctor and health plan anytime.
* Free health educational and preventative text messaging programs by CareMessage.
* Less delay due to the manual eligibility verification process.

Attachment 1



Attachment 2