



55 Water Street, New York, New York 10041-8190

September 10, 2018

Re: Emergency Petition of TracFone Wireless, Inc. for an order directing USAC to alter the implementation of the National Verifier to Optimize the Automated and Manual Eligibility Verification Processes

On behalf of EmblemHealth, we are writing in support of the Emergency Petition filed by TracFone Wireless, Inc. on August 9, 2018 urging the Federal Communication Commission (FCC) “to direct (the Universal Service Administrative Company) to accelerate the National Verifier’s access to state and/or federal data sources necessary to verify subscribers using the automated process and refrain from launching the National Verifier in a given state until USAC has incorporated eligibility verification based on enrollment in key federal benefits programs, such as Medicaid, into the Verifier’s automated process for that state.” EmblemHealth is the largest community-based nonprofit health plan in the country and this issue is of direct importance to the 140,000 Medicaid beneficiaries we serve in New York State, many of whom depend upon the innovative services TracFone provides as our contractor in the Commission’s Lifeline program.

EmblemHealth is one of many health plans that depends upon the Lifeline program to ensure our enrollees receive the care they need. This program provides financial assistance to low-income individuals to obtain data, text, or voice services they otherwise cannot afford, which then allows EmblemHealth to communicate important information by text to ensure our enrollees can take best advantage of the services we offer. Studies demonstrate these text-based programs improve care for low-income individuals. For example, recent analyses have found health plan-based texting programs for low-income pregnant women reduce alcohol and tobacco use¹ and lower blood sugar levels for individuals with diabetes.² These programs are also reducing costs for beneficiaries and payers, including one study finding a text messaging program focusing on diabetes management achieved savings of \$812 per participant over a six month period.³

As TracFone describes in its Emergency Petition, the Lifeline program’s current health plan-driven eligibility verification process will soon be substituted by the National Verifier. However, it is our understanding that this system has not yet been fully automated. As TracFone

¹ Evans, W. D., Wallace, J. L., & Snider, J. (2012). Pilot Evaluation of the Text4baby Mobile Health Program. BMC public health, 12(1), 1031. Available: <http://www.biomedcentral.com/1471-2458/12/1031>

² Grabosch, S., Gavard, J. A., & Mostello, D. (2014). 151: Text4baby Improves Glycemic Control In Pregnant Women with Diabetes. American Journal of Obstetrics and Gynecology, (210)1:88. Available at: [http://www.ajog.org/article/S0002-9378\(13\)01249-0/pdf](http://www.ajog.org/article/S0002-9378(13)01249-0/pdf)

³ Nundy, S. Dick, J., Chia-Hung, C., Nocon, R., Chin, M., Peek, M. Mobile Phone Diabetes Project Led To Improved Glycemic Control And Net Savings For Chicago Plan Participants. Health Affairs. February 2014 33:2265-272; doi:10.1377/hlthaff.2013.0589. Found at <http://content.healthaffairs.org/content/33/2/265.full>

notes, this may result in the reliance of a less reliable manual enrollment verification process to ensure our enrollees are deemed eligible to participate in the program.

Instead, as the Emergency Petition proposes, the National Verifier should only be used in states where the system is fully automated. In other states, we agree with TracFone that the Commission's contractor should continue to rely upon plan processes to verify eligibility with state Medicaid agencies until an automated system is in place and that USAC should accept a plan-generated eligibility letter as acceptable documentation to demonstrate proof of eligibility. This solution will guarantee the low-income individuals we serve will be able to continue to take advantage of the better access to services the Lifeline program provides while continuing to move ahead with the Commission's goals to preserve and strengthen program integrity which we fully support.

We appreciate this opportunity comment on this matter. Please contact Howard Weiss at hweiss@EmblemHealth.com or 646-447-1074 if you would like to discuss the issues we have raised.