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August 31, 2015

Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th St. SW., Room TW-A325
Washington, DC 20554

Re: *Ex Parte* disclosure pursuant to 47 CFR §54 in WC Docket Nos. 11-42, 09-197, 10-90;
FCC Docket No. 15-71

Dear Ms. Dortch:

On Wednesday, August 12, 2015 Robert Greenstein, Stacy Dean, and Ty Jones of the Center on Budget and Policy Priorities (CBPP) and Professor David Super of Georgetown University Law Center met with FCC staff Jon Wilkins, Louisa Terrell, a representative of the FCC General Counsel, and with Michelle Garber, Vice President of Lifeline at USAC.

Mr. Greenstein discussed generally the expertise that CBPP has on federal public benefit programs and specifically work around cross-program integration. He explained the work that CBPP did in states with the Work Support Strategies initiative. He provided a detailed framework on the background of Stacy Dean, who leads the food assistance division at CBPP and leads the work on program integration.

Ms. Dean provided a context for CBPP's thinking on the Lifeline eligible population and other program participation. During this discussion she passed around a chart representing a draft analysis developed by CBPP (attached) that shows individuals at or below 135% of the federal poverty level and what programs they are currently enrolled in. The chart shows that most low-income people are connected to either SNAP, Medicaid, or SSI or a combination of the three. These programs are the programs that reach the most Lifeline eligible population and must continue to be the targeted programs for Lifeline eligibility. Ms. Dean then went through the background on cross program eligibility and enrollment and the different ways that cross-program enrollment works among some of the programs. She discussed how all children who are enrolled in SNAP are automatically enrolled in the NSLP and this is a requirement under federal law. She discussed other examples of programs, like SSI and Medicaid, SNAP and WIC, and also SNAP and LIHEAP.

CBPP staff explained the difference between cross-administered and cross-enrolled. Ms. Dean discussed there is a variation among the states but to be cross-administered means that a family may have one application that they complete for multiple benefits, one caseworker, and have to verify information only once. Whereas, cross-enrolled means that the

individual's enrollment in one program bridges their enrollment into another program, for example NSLP and SNAP. Ms. Dean discussed that there is no perfect 50 state solution for how to cross-enroll individuals in multiple programs.

CBPP staff discussed the administrative costs of running the various federal public benefit programs and how are states able to split the money when the programs are co-administered. Ms. Dean explained how the administrative funding works for the programs and that when the programs are co-administered the state agencies do keep track of the administrative funds for the particular programs. CBPP did not have exact administrative costs at that time for the Commission but will provide figures in our written comments.

Ms. Dean explained that in states where applicants are able to apply for multiple programs at one time, they are evaluated under the rules of both programs and that SNAP has the more rigorous verification rules and quite often is the program that is used by the state to determine eligibility for other programs.

CBPP staff explained recertification and change reporting in public benefit programs. Ms. Dean walked through the recertification process in SNAP and how it is a complete determination of eligibility and individuals are assumed to be ineligible until they prove that they are still eligible. Ms. Dean and Professor Super emphasized that for recertification the longer the certification period the better for many participants since recertification is a point where many eligible people may lose benefits. Given the small amount of the Lifeline benefit relative to the administrative cost of reporting, Ms. Dean recommended against change reporting.

Professor Super explained that the Lifeline eligibility determination should be kept simple since it is a small benefit and it is tied to other programs that have more rigorous eligibility determinations. Professor Super discussed the downsides to asking for more verifications and having more requirements in Lifeline. These sentiments were echoed by Ms. Dean and Mr. Greenstein. Making the eligibility process more complicated will not help to bring more families in and it doesn't help with the small amount of fraud in the program that occurs where a household is receiving the benefit more than once.

Ms. Dean and Mr. Greenstein explained the error rate in SNAP. Mr. Greenstein went on to explain that with regards to errors/fraud within the Lifeline program, the FCC could help with this issue by first defining within their own program what is an error. Mr. Greenstein provided history on SNAP and how once USDA defined an error in the program, SNAP was able to more accurately demonstrate the true extent of errors and fraud in the program. Without such a clear definition established SNAP would constantly be under scrutiny by changing definitions of error. Mr. Greenstein recommended that the FCC establish a definition of an error in Lifeline as well.

Professor Super discussed how SNAP's Income and Eligibility Verification System (IEVS) *See* 42 U.S.C. § 1320b-7 (establishing IEVS) which most state agencies use as the database to check participants' income. The IEVS database could be used as an example for the type of

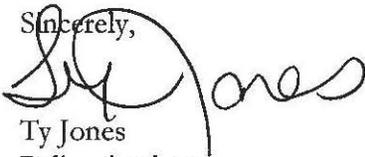
database the FCC could have with the 3rd party verifier or other entity that will check eligibility for enrollment in the qualifying public assistance programs.

Ms. Dean discussed recommendations on eligibility and enrollment strategies. Asking states to either take Lifeline applications or add more questions to their application could work for some states. Others, however might not be interested. CBPP provided FCC with options for other groups to reach out to, to help garner support from state agencies. NGA and APHSA were suggested as contacts for the FCC.

CBPP staff discussed 3rd party non-profits who currently work with states and have access to their eligibility systems. Ms. Dean explained that there are currently other 3rd party non-profit entities that have the ability to look into some state agencies' databases now. These organizations engage in agreements with the state agencies stating how they will protect client's private information. The protection of private information for participants' is important and whether it is a state agency or a 3rd party entity, there is a high standard that must be met in order for the 3rd party vendor to have access to participants' private information.

Ms. Dean and Professor Super also discussed that an EBT card is not the most efficient means to distribute the Lifeline benefit. Ms. Dean discussed the use of an authorization code.

Sincerely,



Ty Jones
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Center on Budget and Policy Priorities