Affordable Connectivity Program - Upcoming System Changes

June 14, 2022

At the end of June, USAC will make changes to the National Lifeline Accountability Database (NLAD) and the Affordable Connectivity Claims System (ACCS) to align with the Affordable Connectivity Program (ACP) rules on the one-time connected device benefit.

- **Device Claims Based on First Provider** - ensures that the first provider to give a subscriber a device is able to claim reimbursement, even if the subscriber transfers to another provider prior to the snapshot (taken on the 1st of the month)
- **Maximum Device Rate Validations** - ensures providers cannot claim more than the market value of the device minus the copay that the household paid for the device, or the maximum benefit of $100

Device Claims Based on First Provider
The FCC allows participating providers to submit device claims for households that received a device from the first provider, but transferred their monthly service benefit to a different provider before the first of the month (47 CFR § 54.1806(e)(3)). Since June 2021, USAC has worked directly with providers seeking to claim device reimbursements for subscribers that subsequently transferred its monthly benefit to another provider prior to the snapshot, using a manual process that collected certified device claims outside of the regular ACP monthly claim submission process in ACCS.

Beginning with the July 1, 2022 snapshot, USAC will apply system changes to ensure that "first providers" will now be able to submit a device claim for subscribers that subsequently transferred before the snapshot, directly through ACCS with their regular monthly ACP claim filing, rather than going through a manual process.

Once a subscriber has enrolled with a provider with a device reimbursement date, no other provider will be able to add a device reimbursement date moving forward. Other providers are still able to transfer (if still enrolled with another provider) or re-enroll (if previously de-enrolled from ACP) the subscriber for ACP service, but will not be able to add a device reimbursement date.

New NLAD Error Based on Device Eligibility
Providers will receive a new hard error if they try to perform a verify, enroll, transfer, or update transaction in NLAD using a device reimbursement date when the first provider is still able to submit a claim for the device. This error will replace the existing warning message that providers receive when they try to enroll a subscriber who already has the device reimbursement date with another provider but no claim has been filed:

- **UNAVAILABLE_DEVICE_IN_PROGRESS**: Another provider has already given a one-time device benefit to this subscriber and is still within the administrative window for claiming the benefit. You can offer the subscriber a device after the filing deadline in the following month if the provider does not submit a claim by: MM/YY. Contact ACProgram@usac.org to dispute.

These changes may require NLAD API changes. Service providers may request the updated API specifications by emailing ACProgram@usac.org.

NOTE: The MM/YY date is based on when the six-month administrative window to file claims ends for the first provider. For example, if the first provider added a device reimbursement date into NLAD on 4/15/2022, the filing deadline will be 11/22. The period during which the first provider can submit the claim is based on when the device

reimbursement date is added in NLAD, not on the date itself.

NLAD Report Updates Based on Device Eligibility
In addition, the following device eligibility fields will be added to the Detail Subscriber Snapshot Report:

- Eligible for Device
- Eligible for Rate

These fields will help providers identify which subscribers are eligible to be claimed for a device and which subscribers can be claimed for service (monthly service benefit). As a result of these updates, a subscriber may appear on more than one provider's snapshot report for a given data month. For example, if a subscriber who recently received a device transfers their monthly service benefit to another provider within the same month, the subscriber will appear on the "first provider's" snapshot report as eligible for only the device benefit. The subscriber will also appear on the "second provider's" snapshot as eligible for only the monthly service benefit.

ACCS Claims Input Template
The ACCS claims template will include two new fields:

- ELIG_FOR_DEVICE
- ELIG_FOR_RATE

These two columns will be populated as follows:

Benefit Eligibility	ELIG_FOR_DEVICE	ELIG_FOR_RATE
Monthly benefit only	0	1
Device benefit only	1	0
Monthly and device benefits	1	1

In the event a provider is able to claim a subscriber for the device benefit but not the monthly service benefit, the "Rate" field will be pre-populated with a 0 and a reason code of U8. The U8 reason code is new and means that no rate is claimed because the subscriber is only eligible for the device benefit.

NOTE: As subscribers who are only eligible for the device benefit are no longer enrolled with the provider, these subscribers must be claimed within the specified snapshot month. These subscribers will not carry over into following snapshot months.

Maximum Device Rate Validations
In addition to the changes described above, a new validation is being added to the maximum rate that a provider can claim for the one-time device benefit. In accordance with the ACP rules, the amount a provider can claim for the device benefit cannot exceed the market value of the device minus the copay paid by the household, up to $100 (§ 54.1803(b)). If the device benefit exceeds the market value minus the copay, providers will receive the system error below:

- Device Benefit rate is invalid. You may not claim more than: $xx.xx

The claims file will be rejected and the provider will have to update the device claim amount and ensure it does not exceed the market value of the device minus the copay paid by the household, as entered in NLAD.

Compliance Reminder
As a reminder, providers are responsible for keeping information in NLAD, including device information, up-to-date at all times.

Outreach & Trainings
On Thursday, June 16 at 3 pm ET USAC will host a device claims training to go over the changes outlined in this bulletin. Service providers who offer devices are encouraged to attend this training. Register here to sign up for the training.

USAC will continue to distribute bulletins and conduct trainings to help service providers and other program participants understand the ACP Order and its effect on current and new program processes.
USAC will also continue to update its ACP service provider web content to reflect updated ACP rules and processes. Find upcoming trainings and other resources on the ACP Learn page on USAC's website.

Need Help? Contact Us!

For questions about the Affordable Connectivity Program, service providers can visit USAC.org and consumers should visit AffordableConnectivity.gov. For general program support, service providers should email ACProgram@usac.org and consumers should email ACPSupport@usac.org. Both providers and consumers may also call ACP Support Center at (877) 384-2575 for assistance.