

How the Lifeline Program Can Help Vulnerable Consumers Connect to Voice and Internet Service after a Natural Disaster

March 2018

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The federal Lifeline program helps low-income households afford voice and broadband internet service. After Hurricane Katrina, Lifeline cell phone service helped economically fragile families displaced by natural disaster connect once again to the outside world to access disaster assistance, employers, family, and community to begin the process of rebuilding their lives. Immediately after a natural disaster, access to voice, texting, and internet service is critical to connect consumers to emergency services, shelter, and medical care. However, families with limited income who are displaced from their home or have otherwise lost access to their phone service may not have the discretionary income on hand to purchase essential voice and data service and a handset. Households that have experienced a dramatic loss of income may, for the first time, qualify for Lifeline service. The Lifeline program provides low-income households with a monthly \$9.25 subsidy for voice and/or broadband service to help low-income households. This modest subsidy can go a long way.

The most popular Lifeline product is a wireless voice and data bundle that could be helpful for those who are displaced immediately following a natural disaster. It is a wireless prepaid service that does not require a deposit or good credit score and does not have a monthly bill. The monthly \$9.25 covers a set allotment of voice and/or data which is currently at least 750 minutes a month and/or 1GB of data (these amounts increase each year per the Lifeline minimum standards). These wireless Lifeline providers often provide the consumer with a free handset (not covered by the federal Lifeline subsidy). If extra voice or data is needed during the month, consumers can purchase additional voice or minutes from the particular Lifeline service provider. There are also Lifeline products that are more traditional, like wired local phone service to the home, where the \$9.25 is a discount off the monthly bill. The Lifeline program was recently updated to include broadband service. The marketplace for wired internet broadband to the home is in the beginning stages, so voice and wireless voice/data bundles are the most common Lifeline services.

Who Qualifies for Lifeline

There are two ways to qualify for Lifeline. The easier and quicker way to establish eligibility is by providing proof of enrollment in Medicaid, SNAP (food stamps), SSI (Supplemental Security Income), Federal Public Housing Assistance, Veterans Pension/Survivor Benefits, or certain low-income Tribal benefits (Bureau of Indian Affairs General Assistance, Tribally-Administered Temporary Assistance for Needy Families, income based Head Start or the Food Distribution Program on Indian Reservations). Applicants will need to provide documentation, such as a benefits letter or card (e.g., SNAP card). Lifeline enrollment is becoming automated so that in some circumstances the Lifeline determination can be made instantaneously by checking the qualifying program databases to confirm participation in a qualifying program. The second way to qualify for Lifeline is to submit proof that the household income is at or below 135% of the federal poverty guidelines.

Finding a Lifeline Service Provider

Currently, in almost every state, consumers apply for Lifeline service through the carrier of their choice (see the companies near me tool to find a participating carrier and a description of the Lifeline service). Note that not all phone companies and broadband providers participate in the Lifeline program, only those approved by the state's public utility commission or the Federal Communications Commission as an eligible telecommunications carrier (ETC). Lifeline households that are displaced by a natural disaster may find that they need to change Lifeline providers because they are now outside of the service area of their original provider. The Lifeline program allows consumers to change Lifeline providers for any reason. Use the company locator tool to find a new Lifeline provider. The new carrier can walk the household through the carrier change process.

What Happens When a Consumer Applies for Lifeline

When a consumer applies for Lifeline, there will be an immediate check to determine if the consumer's household already has a Lifeline benefit. There will also be an immediate check of the consumer's identity. The second step in the eligibility determination will be to verify that the consumer is either participating in a qualifying program or is income eligible.

Federal Lifeline program rules require that the Lifeline application collect specific information, such as the last four digits of the Social Security number. The information is required, so failure to fully complete the application will result in a denial of Lifeline benefits. The Lifeline benefit is a household benefit, so any adult in the household can be the applicant. The federal rules also require that the consumer provide specific certifications (for example, that they do not already have Lifeline service). See page 4 in the Lifeline application. This standardized Lifeline application form will be required by July 2018. Applicants will be given this form or, for a few more months, a form prepared by the company that looks very similar to the standard application form.

The Lifeline enrollment process will change over the next two years and the process will become more automated, quicker, and standardized so that it will be the same for everyone. NCLC will update this issue brief as the new National Eligibility Verifier process comes online. Consumers in Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming will be in the first wave of states migrating to the National Eligibility Verifier in 2018. In those states, to the extent possible, program eligibility will be automated and, instead of the Lifeline company making the eligibility determination, it will be the Universal Service Administrative Company (USAC) a not-for profit organization that administers the Lifeline program for the Federal Communications Commission.

Important Program Rules

- Federal rules limit the Lifeline benefit to one-per-household. If the household is doubling-up with another family that has Lifeline service or in a transitional living arrangement with other households that are applying for Lifeline or have Lifeline service — common situations in natural disasters — the household will be asked to fill out an additional worksheet to demonstrate that their household is economically independent from the other Lifeline household(s) at that same address.
- Lifeline consumers can switch Lifeline providers at any time. Consumers do not need a special reason to change Lifeline providers. The federal program rules make it easy for consumers to shop with their feet and change providers.
- Companies must de-enroll Lifeline subscribers if they do not use their Lifeline service within a 30-day period as the account will be considered inactive. Consumers who lose service due to inactivity can reapply for Lifeline service through the process previously described.
- Lifeline recipients must annually recertify eligibility for Lifeline service, but the FCC can waive

this rule for areas recovering from a natural disaster. For example, after Hurricanes Irma and Maria, a wireless Lifeline provider petitioned the FCC for a temporary rule waiver regarding annual certification to avoid having to de-enroll Lifeline subscribers at a time when the damage from the hurricanes made it difficult for Lifeline subscribers to receive or respond to messages regarding annual recertification deadlines. A similar waiver was granted after the California wildfires. The California Public Utility Commission requested a temporary waiver of the annual recertification rule and the rule requiring de-enrolling Lifeline consumers if they did not use their service within a 30-day period for the 13 counties affected by the wildfires in October and December 2017.

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