

To: CA LifeLine Carriers

From: Xerox

C: CPUC

Date: 11/10/2015

## **Subject: Carrier Workshop Meeting Topics – Thursday 10/22/15**

### **Attendees:**

#### Xerox Team

Tom Burns – Program Manager  
Bill Allen – Operations Manager  
Alex Gudkov – IT Manager  
Tom Keller – Sr. DBA  
Maureen Kenihan – Call Center Manager  
Amy Wang – Sr. .Net Developer  
Bo Lay – Sr. Data Analyst  
Wanda Hutchinson – Business Analyst  
Vanessa Garcia – Operations Data Analyst

#### CPUC Team

Jonathan Lakritz – Program Manager  
Fe Lazaro – Program Supervisor  
Michaela Pangilinan – Regulatory Analyst  
Llela Tan-Walsh – Regulatory Analyst  
Anna Jew - Regulatory Analyst  
Patty Cassaro – CAB Supervisor  
Maria Vasquez - CAB Representative

### **Topics Covered - Presented**

- Program Statistics and Trends
  - Program Participation
  - Call Center Throughput
  - Approval Rates (Applications/Renewals)
  - Correctable Denial (CD) Statistics & Trends
  - Mail Statistics
  - Direct Application Process (DAP) Transaction Trends
  - Quality Audit (QA) Statistics
- Renewal Process, Interactive Voice Response (IVR) Renewals, Phone Renewals
- DAP Enhancements, Potential Process Changes
- Program Guidelines and Conventions
- Mail Forwarding and Identity Authentication Form (IDAF) statistics
- Transfer Process

### **Presentation Slide Deck – Program Statistics**

- **Add CD Codes to Enhanced Carrier Feed** - In an effort to increase the renewal rate and notify carriers of their consumer's renewal status, Xerox is looking to enhance the information delivered in the daily carrier feed to be more descriptive for the carriers when consumers are in the renewal process. The proposed method may alleviate the problem of Xerox receiving many questions from carriers as to why a particular consumer was denied, even though the denial reason is currently available to all carriers on the private website.

Xerox understands the inconvenience and will evaluate delivering the denial reasons in the daily carrier feed. Both the status codes and denial codes will continue to only be available to carriers with the extended return feed. Not all carriers receive the extended version but hopefully this would encourage carriers with the standard return feed to make the necessary enhancements to accept the extended return file.

### IVR Renewal Project

- **Secure and Simple** - Xerox wants to avoid having the IVR process to be too difficult to use for consumers; thereby potentially discouraging consumers from continuing with the IVR renewal process. The availability of the IVR will remain the same as it is now to everyone who has access to a phone. The system will be available 24/7 except during scheduled maintenance windows. During any maintenance window, a message will be played directing callers to call back into the IVR at a time following the scheduled maintenance window.
- **PIN Code** - Xerox will provide PIN information to consumers on Day-3 and Day-21 of their renewal process (assuming Xerox has not received consumer's renewal form prior to Day-21 of the renewal process). In order to verify that the person calling is the actual consumer on the program, a 2-way authentication method will be used:
  - PIN
  - Personal information of the program consumer (the current 5 identification elements used during the authentication process with a consumer service representative (CSR) will be slightly revised and used during the IVR Renewal process:
    - Name – Will be multiple choice,
    - Date-of-birth (DOB) -
    - Last 4-digits of social security number (SSN4)
    - Telephone number (TN)
    - Address
- **Return Signature and Confirmation of Receipt** – Xerox will require the caller to enter the last 4-digits of their social security number to confirm the information they entered/selected via IVR is performed by the consumer authorized to be receiving the LifeLine benefit. Once the renewal process has been completed via IVR, the consumer record will be reviewed by a trained CSR for duplication, fraud, income eligibility and other program qualification requirements.

## IVR Renewal Topic Questions & Answers

### **How many times can a consumer start their renewal process?**

- A consumer can start their renewal process as many times as they like when their renewal process is incomplete for the associated consumer PIN. However, they will need to restart the entire renewal process from the beginning if they start the IVR renewal process and terminate before the process has been completed.

### **What happens if the consumer selects the wrong answer (i.e. name) or fails the IVR authentication process?**

- The authentication process will continue and the system will not notify the consumer if the response they entered is incorrect for security purposes. Upon completing the authentication process, the IVR system will relay a response of failure to the caller without defining the actual section they failed. The caller will have the option within the IVR to speak to a CSR agent should they have any questions and can complete the renewal process via mail or the public website.
- The interview process via the IVR system will be the same as the questions listed on the renewal form. Xerox is attempting to simplify the process and keep consumers on the phone for no more than 4-5 minutes.

### **What happens if the consumer fails via IVR, will they get a correctable denial?**

- Yes, Xerox will follow established program eligibility determination rules regardless of the mechanism used to renew.

### **What is the timeline rollout of the IVR Renewal Update Process?**

- Xerox anticipates implementing the IVR Renewal Project once a timeline schedule has been established between Xerox and the CPUC, which then will be shared with the carriers. After the project is implemented, Xerox requests that the carriers notify their consumers to complete their renewal process via IVR whenever possible.
- CGM and other ETCs have offered to provide Xerox with messaging scripts they use when communicating new process/enhancements with consumers.

## Phone Renewals Concept

- **Convenient** - Xerox feels that seniors would benefit from Phone Renewal feature, as it would be ideal and convenient for callers to complete their renewal process with a CSR. Certain callers would probably be discouraged to use the IVR due to the interaction that will be required between them and the IVR system. If the Phone Renewals were to happen, Xerox anticipates that specific disclosures

read over the phone by a CSR would be minimal and that the entire call would be no longer than 4 to 5 minutes.

- **Process Authentication** – There would be no change to what the Call Center is currently doing. Caller who elects to speak to a CSR would continue to provide the 5 identification elements to the CSR during the the authentication process. Callers must pass the authentication process before any of the consumer’s account information can be released.
- **Simple** – Some people like to talk and would prefer to communicate with a live person than perform specific actions via an automated IVR system, online, or via mail.
- **Interview** – Make the process simple, fast, and available. Xerox’s existing IVR system would recognize callers that are within their renewal window, and when calls are transferred from the IVR system to CSRs, the CSRs would be alerted to consumer’s renewal status when taking the call.
- **Electronic Signature** –Consumer acknowledgement of signing renewal forms and completing the renewal process will be recorded by the IVR system by obtaining consumer’s SSN4 -or by voice recording when the process is completed with a CSR.
- **Confirmation of Receipt** – Renewal confirmation via the IVR will be similar to the process used by the public website. The IVR system will present renewal confirmation to the consumer. In addition CSRs can provide renewal confirmation to consumers.
- **Warm Transfers** - Introduce warm transfers to CSRs or IVR. This is a concept Xerox needs to evaluate in conjunction with the CPUC to assess what warm transfers will accomplish and if it will be beneficial to consumers. This is just a concept and is not a project that is planned for development in the near future.

## Phone Renewal Topic Questions & Answers

### **What are the next steps for phone renewal to be scheduled?**

- Xerox will work closely with the CPUC to determine the next steps.

### **Will there be instructions for warm transfers?**

- Instructions will be shared with the carriers once a decision has been made to move forward with the concept as a project. The CPUC and Xerox will identify the benefits and review the current operations of the IVR system.

### **What is the purpose of the phone renewal and IVR renewal, to eliminate renewal by mail?**

- The phone and/or IVR renewal process will not eliminate the required mailing of renewal forms to consumers. Per the CPUC – General

Order 153 renewal forms have to be mailed to consumers and renewal timeframes cannot be shorten.

**Would it be possible to implement mobile enabling of the current website for renewals?**

- Not at this time. Xerox will evaluate this great suggestion.

**Can Xerox provide a code to indicate when the renewal process has been completed?**

- This information is already available on the private website. However, Xerox can introduce new status codes for renewal processes started and renewal decisions rendered. Currently, any decisions made prior to a consumer's anniversary date are not available until the consumer's anniversary date.

**Is Xerox committed to delivering the CDs in the extended return file or is it just an idea?**

- Based on the carriers' feedback during the carrier workshop, Xerox enhanced the denial code information in the daily carrier feed on October 23, 2015.

**How do you handle transfers when consumers only have 30 days left on their current term and have not completed their renewal process?**

- Xerox allows the transfer to occur and will deny the consumer at the current anniversary date. However, if the benefit transfer is implemented the transfer date would activate a new renewal anniversary date.

**Potential DAP Enhancements**

- **Original DAP Concept** - DAP was originally designed to allow carriers to print the consumer's application form in real-time compared to those who receive their forms via mail, that is why the PDF is generated. Currently, carriers submit their referrals to Xerox, and Xerox subsequently reviews and processes the referrals. If the referral passes where a printable application form is generated and returned to the carrier, the carrier/consumer then completes the form and submits it back to Xerox for further review and processing.
- **\*\*Potential DAP Enhancement** - A possible idea would be to enhance the DAP platform and determine if there is a need to to continue generating PDFs. Initially, the PDF was to ensure all consumers (DAP vs non-DAP) were getting the same information. However, since the current DAP process is digital and requires a substantial amount of information to be exchanged in near real-time, Xerox could possibly eliminate generating PDFs if consumers do not want them (i.e. are not requesting a PDF in order to complete the

form later). Xerox's objective is to streamline and standardize the process, and host the solution on their network. Carriers would continue to collect information from consumers, make the DAP call, and then Xerox would return the location of the form via URL, which will contain the encoded application ID to allow seamless authentication. The consumers would still have to go through the final steps of selecting a program eligibility method and signature acknowledgement. This proposed DAP Enhancement would simplify and streamline the process to avoid the possible connection breaks between DAP carriers and Xerox services when generating PDFs.

**Hosted Solution** – The exchange between DAP carriers and Xerox will be stored on Xerox's network. DAP carriers can wrap the application program interface (API) onto their application or website.

### **Potential DAP Enhancements Topic Questions & Answers**

#### **Will the DAP Enhancement replace WES that was supposed to be deployed in Q4 of this year?**

- The DAP Enhancements will not replace WES. WES was postponed as the CPUC redirected Xerox efforts to simplify the Renewal Process in order to improve the program's consumer renewal rate. Xerox is attempting to address the low program renewal rate issue and provide DAP Platform stability. The proposed DAP Enhancements would satisfy the needs of both the carriers and consumers.

#### **Will the system generate a PDF if it needs to be provided to USAC?**

- A summary of the form with consumer's signature will be provided, which will suffice the document requirement.

#### **Although the DAP enhancement will speed the response time, would it be easier to convert to e-signature?**

- Xerox is looking to collect the signature instead of e-signature via DAP. Xerox is also considering other methods to streamline the way data information is exchanged, as it is currently only available once per day. The current DAP process only allows initial referral; it does not allow updates or disconnects. Xerox will evaluate the system's limitations and determine if it would be useful/helpful to allow other transaction request types: Disconnect, Remove and Update by using the API to retrieve the consumer information. Xerox is also looking into allowing true-up requests on demand where the carrier would be able to submit the request and the true-up file would be generated the next day.



## Other Potential Process Changes

- **Moving Identity Authentication (IDA) Check Upfront** – Currently Xerox qualifies consumers first before initiating the IDA check. The IDA check process requires Xerox to validate that the consumers' identity is confirmed by LexisNexis or the IDA form. Wireless carriers using the DAP services have suggested to move the IDA check upfront to authenticate the consumer during the web service call prior to approval. By moving the IDA check upfront, Xerox would notify carriers when IDA documentation is needed for their consumers. Carriers would then provide consumer information during the data exchange to Xerox in order to pass IDA in real-time.

## Other Potential Process Changes Questions & Answers

### **Would moving IDA upfront identify duplication to determine if the carrier needs to include a government issue ID?**

- No, duplicates are identified using the LexID, which has nothing to do with government issued ID documents/information upfront.
- Carriers reported some of their consumers should have been approved as their government issued identification was provided during the consumer information exchange. Xerox acknowledged those instances and at that time the IDA exception process was introduced there was a learning curve, which has since receded. Xerox educated its staff members and has added refresher training courses which are available to all staff members involved with the CA LifeLine Program.
- Carriers suggest hardcoding the functionality of forcing CSRs to select and review the consumer ID when presented in order to avoid this from happening in the future. Unfortunately, there is a problem with hardcoding as it forces the issue to require all carriers to provide a flag when the identity document is sent. The ID type field needs to be standardized for all carriers and not specific to only one carrier.
- The existing DAP requirements document will need to be updated to identify if the ID field is required and followed by all carriers before it can be implemented. CPUC approval is needed before any action can be taken.
- The IDA check upfront would only be for DAP not FTP carriers, and it would be executed during step 2 where SSN4 and DOB are exchanged.

### **Will moving the ID check to the front end of the application process fix the check subscriber call to accurately identify applicants as new or transfer transaction?**

- LexisNexis cannot be used 100% since their algorithm cannot resolve a person's identity 100% of the time.

**Carriers announced that if an individual is providing proof of eligibility during in-person enrollment, it should be acceptable for renewal and automatically reset the renewal date no matter if the consumer is in their renewal period or not.**

- Per CPUC, there will be a proceeding to review the General Order and the CPUC will provide an answer to this question thereafter.

**Approximately 37% of correctable denials are due to signature reasons. Carriers believe this is a significant issue and warrants allowing e-signature during enrollments.**

- Xerox is looking to modify the DAP Process, and will look into introducing e-signature via the web, however, Xerox will need to capture the actual signature.

### **QA Statistic and Signature Guidelines**

- **QA Statistics** – Provides an assessment of the accuracy of the forms processing and call quality process. It provides an answer for when the process is followed. For example, the Call Center performs monthly quality audits to ensure CSRs are following the proper procedures when handling calls and processing forms. During the timeframe of Jan 2015 – Aug 2015 the Call Center scored an average of 98.52%).
- **Signature Guidelines** - Carriers submitted questions to the Administrator regarding what was considered acceptable vs unacceptable signatures. A Signature Guidelines document was shared with the carriers which satisfied their questions.
- When a signature is not provided or is considered unacceptable, the consumer will receive a CD. If a CD has already been sent, the consumer will be denied. Unfortunately, due to the low response rate of CDs, Xerox requests that carriers assist their consumers in signing the forms in accordance with the signature guidelines document. This would be helpful when reviewing forms for approval.

### **Signature and Form Questions & Answers**

**Is Xerox using anything on the backend or is there human review when reviewing the signature?**

- Signatures are human reviewed by CSRs. Carriers feel that this may be a restrictive process causing difficulty with their consumers passing the signature guidelines.

**Is printing consumer's signature acceptable?**

- Yes. Xerox clarification – It must be a consumer printed signature not a computer printed/typed name. The driver's license name and the name presented on the form must match. CSRs have been trained that if the signature on the form is illegible yet the signature matches



the signature on the DL/ID card, they can approve the form if all other requirements are met. They cannot use the DL/ID signature to deny.

**Will the new signature guidelines help with reducing the amount of the CDs produced and/or applications that are denied?**

- Yes, qualitatively it will help.  
Naming Conventions: If a consumer standing in front of the carrier is filling out the form with a different name than the name presented on the ID, the form will not be accepted. If an existing consumer or previous consumer within the last 30 days of their disconnect/removal date completes, signs and mails an application form by the response date and a match is not found during the matching process, it will be processed as a new app up-front because it is not a 100% match.

**What initials are acceptable in step 2 of the application/renewal form if the consumer has 4 names since there is only room for 2-initials?**

- As long as any two of the initials of the four names are provided, it will be acceptable.

**What happens if you have a John Doe and a Jane Doe?**

- Xerox clarification - You can only have one name. If there are multiple names, you can add the additional names in the name field of the billing section, but not the other name field.

**Are Power of Attorney (POA) signatures acceptable?**

- Yes, as long as the POA box is checked.

**Anniversary Date**

- **Consumer Anniversary Dates-** The anniversary date information is available on the monthly true-up report, which is updated and available once a month on the private website. Xerox is considering the idea of providing the information more often where carriers can request their consumer base information on demand instead of viewing it once a month on the monthly true-up report (performed every 2<sup>nd</sup> Sunday a month). An API call would be made where the system will flag the information for the requesting carrier, and the next day the consumer information will be available to the carriers.
- **Anniversary Date** – Is provided in column 37 of the monthly true-up report and is also available on the private website under the consumer details section.
- **Renewal Lifecycle** - Some carriers have set their consumers renewal lifecycle to account for the 105 days by using the calculation 365 days minus 105 days, which would be the anniversary date. This is a good idea, however, Xerox warns carriers to be aware of the certification vs transfer date. Xerox recommends carriers use the

true-up report to obtain the correct date since the carrier-calculated date may incorrectly calculate the renewal date. Carriers can use the true-up report to correct any errors.

- **Transfers** - When consumers are transferred from the losing carriers to the winning carriers, the losing carriers are notified by denial code VD 90-5. The renewal date (anniversary date) with the losing carrier holds true when transferring to the winning carrier.
- **Return file** - The Return file is important in order to review the status and denial of a consumer's record. Xerox advises carriers that receive the expanded return file to review the status code(s) as they are intended to notify carriers of what is happening to the consumer during their application/renewal process. For example, status code 30 is returned to carriers during a consumer's certification/renewal process, which notifies the carriers that their consumer will be denied due to a bad address/undeliverable mail flag, which is also reported on the monthly true-Up.

## Anniversary Date/Bad Address Questions & Answers

### **What about temporary housing for mailings?**

- Xerox does not have a temporary address flag at this time. However, if the consumer has an updated address the carrier should send an update transaction.

### **Does Xerox have shelter addresses/locations?**

- When consumers moved from an old address to a new address, Xerox will attempt to mail the materials by using the mail forwarding service. However, if the mail item is undeliverable, nothing further can be done until the carrier sends an address update transaction.

### **What happens if there is no update that can be made?**

- The carrier must send an update record transaction with the same information in order to reset the bad address flag. If the consumer is in the renewal process during the update, Xerox will resend the renewal form.

### **Is there an impact to IVR when there is a bad address flag?**

- The IVR currently handles bad address flags and will continue to operate as it does today when the IVR Renewal Project is developed. If the bad address flag is set, the consumer will not be in the renewal process, the bad address flag will be set on day 105 from the anniversary date and they will be auto denied on their anniversary date. However, consumers can still transfer up to 7 days prior to their anniversary date but will be denied with the new carrier on their anniversary date. An address update by phone is not acceptable due to the required address validation. However, if Xerox were to

implement the warm transfer functionality it would require the carrier to perform the address update and upon completion warm transfer the consumer to CA LifeLine Call Center.

**What should carriers do for consumers with the bad address flag for renewals?**

- If the consumer applies again via DAP, Xerox will deny the consumer. If the consumer applies again via FTP, Xerox will attempt to send the form. However, it is recommended that carriers submit an address update in order for Xerox to be in sync with the carrier.

**Program Guidelines and Conventions**

- **Status Code 48** – This status code notifies the carriers that the Administrator has collected the metadata file for a particular consumer, yet none of the actual direct application was received.
- **Error codes** - Error codes are sent in the activity file that implies the records could not be processed. Carriers must review and make the appropriate edits in order to process the record. For example, zip codes are being submitted to Xerox with 5-digits in one field, each field should have 1-digit as there are five fields for zip code.
- **Mail Forwarding** - Since the launch of mail forwarding (Sept 22, 2015) ~11K pieces of mail have been forwarded with status code 55 (It is the carrier’s responsibility to contact customer to verify address and then notify Administrator) returned to the carrier.
- **Transfer Process** - The transfer process is working the way it was intended. However, consumers are going back and forth between carriers where their names are slightly different than previously provided. The matching process has to be a 100% match (William C Allen vs William C. Allen is not considered a 100% match). The matching logic verifies the following consumer information:
  - Name
  - Service address (service address is standardized during the matching process)
  - Phone number or prior phone number
- **Fraud** - In order to prevent suspected fraud, the CPUC considered using a personal ID, but recognized nothing is perfect, as consumers will always find a way to manipulate the system.

**Carriers would like their consumers to restart the certification process for transfer transactions.**

- When a consumer is transferred to the winning carrier, the winning carrier requests that the service term starts over to allow the transferred consumer to be on the program for a year from the transfer date. The winning carriers also request that original

enrollment documents with the losing carrier be sent to them upon transfer.

- Xerox feels that the consumer would be confused and would not mail their forms if the transfer by porting feature is used.

### **Who receives the reimbursement when consumer transfers from carrier A to carrier B, and then back to carrier A?**

- Xerox has to assume the consumer was receiving service from the current carrier. However, if the consumer is claiming they are not using services with anyone at the time they request to return to carrier A, the consumer should contact the current carrier B or contact Xerox to be “removed from the program.” The 30 day rule would be used in this instance once the consumer is identified.
- When a carrier disconnect is initiated vs. consumer initiated disconnect, the 30 day rule to reconnect still applies.
- When an application is reviewed and an approval decision is made, the system flags the application for the duplicate resolution process and the date of review will be the transfer date.

### **Duplicate Resolution Process**

- **Duplicate Resolution** - The duplicate resolution process looks at both the SSN4 and DOB along with LexID, if it is available. The LexID is a unique identifier used for identifying individuals, which flags the consumer when LexisNexis finds a possible match. It should be noted that the same LexID can be returned for more than one person as it attempts to provide the best matched consumer information. For this reason, Xerox does not use the LexID alone when authenticating a consumer. Xerox performs a duplicate check process so Xerox does not blindly rely on the LexID. During the duplicate check process consumers are mostly identified and processed after reviewing the documents that are returned and scanned by the inbound mail facility.

### **Is Xerox looking to improve this process?**

- Yes, Xerox is always looking at ways to improve any process that will benefit the stakeholders, and is open to suggestions.

### **Upcoming Changes to the General Order**

- Per CPUC, Phase 2 of the California LifeLine proceeding will take place after the Commissioner and staff have addressed and identified current program issues. The General Order captures these items and before decisions can be made regarding program policy changes, a scoping memo is published and a proceeding will follow thereafter.