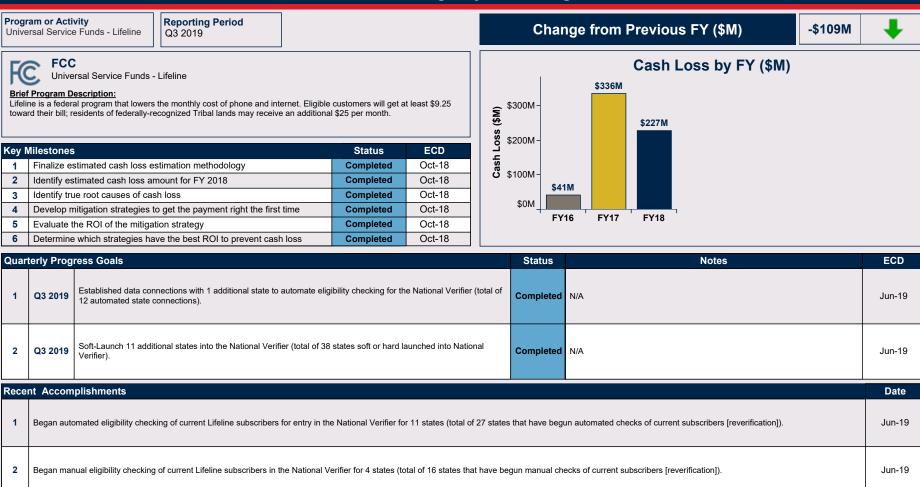
Goal: Getting Payments Right



FY18 Amt(\$)	Root Cause	Root Cause Description	Mitigation Strategy	Anticipated Impact of Mitigation
\$222M	Insufficient documentation to determine	Inadequate Certifications - Carrier provided an inadequate enrollment certification.		Ineligible Certifications - Resolving improper forms that the ETCs are using through the Universal Forms will resolve the vast majority of the issue. Full implementation of National Verifier by 12/2019 resolves the issue entirely.
		Missing Certifications - Carrier failed to provide enrollment certification or re-certification form.	Missing Certifications - USAC collects and retains Lifeline subscriber certification and re-certification forms for the National Verifier, taking this requirement out of the service providers' hands.	Missing Certifications - USAC's independent collection, review and retention of the certifications will nearly eliminate this issue.
\$5M	Other reason	Ineligible Subscribers - Carrier allowed ineligible subscribers into the program or did not collect or retain proper documentation.	Ineligible Subscribers - USAC independently collects, reviews, and retains necessary eligibility documentation for subscribers entering the National Verifier.	Ineligible Subscribers - USAC's independent collection, review and retention of necessary eligibility documentation will drastically reduce ineligible subscribers in the Program.

Cash Loss - Cash loss to the Government includes amounts that should not have been paid and in theory should/could be recovered.