



A report to the  
Governor  
President of the Senate  
Speaker of the House of Representatives

**FLORIDA**

**LIFELINE**

**ASSISTANCE**

Number of Customers  
Subscribing to Lifeline Service  
And the Effectiveness of  
Procedures to Promote Participation

December 2017





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Office of Industry Development & Market Analysis  
Office of Consumer Assistance & Outreach



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## List of Acronyms

CFR	Code of Federal Regulations
DCF	Department of Children and Families
ETC	Eligible Telecommunications Carrier
FCC	Federal Communications Commission
FPSC	Florida Public Service Commission
NLAD	National Lifeline Accountability Database
OPC	Office of Public Counsel
SNAP	Supplemental Nutrition Assistance Program (formerly Food Stamps)
USAC	Universal Service Administrative Company

## I. Executive Summary

The Florida Public Service Commission (FPSC) is required to report to the Governor, the President of the Senate, and the Speaker of the House of Representatives each year on the number of customers subscribing to Lifeline service and the effectiveness of procedures to promote participation in the program. This report is prepared pursuant to the requirements contained in Section 364.10, Florida Statutes.

The Lifeline program is designed to enable low-income households to obtain and maintain basic telephone and broadband services. The Lifeline program offers qualifying households a discount on their monthly bills. Alternatively, consumers can select a free Lifeline cell phone and monthly minutes and/or measured data service from certain wireless providers. This report presents Lifeline program participation data from July 2016 through June 2017, and evaluates procedures put in place to strengthen and streamline the Lifeline program.

As of June 30, 2017, there were 685,864 eligible households that participated in the Lifeline program in Florida. This equates to approximately one of every twelve Florida households participating in the Lifeline program.<sup>1</sup> Lifeline assistance participation includes the involvement of the FPSC, the Florida Department of Children and Families (DCF), the Florida Office of Public Counsel (OPC), and other agencies that provide benefits to persons eligible for Lifeline service.<sup>2</sup>

Forty-one percent of all Lifeline-eligible Florida households are receiving Lifeline assistance. The Supplemental Nutrition Assistance Program (SNAP) continues to be the largest qualifying program for Lifeline assistance in Florida. Based upon June 2017 SNAP participants, the number of Lifeline eligible households decreased by 2.9 percent compared to last year.<sup>3</sup>

The FPSC continues to focus on improving the enrollment process, while eliminating any waste, fraud, and abuse in the program. Specific enrollment initiatives include the following:

- FPSC Lifeline Coordinated Online Application Process
- FPSC/DCF Coordinated Lifeline Enrollment
- Annual Recertification Procedures
- DCF Certification/Verification Web Services Interface
- National Lifeline Accountability Database

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<sup>1</sup> Florida Legislature Office of Economic and Demographic Research, Demographic Estimating Conference, Florida Households Jul. 2017: 8,024,836, <http://edr.state.fl.us/Content/conferences/population/ConferenceResults.pdf>, accessed Aug. 4, 2017, p. T-2.

<sup>2</sup> Section 364.10(2)(g)1., Florida Statutes.

<sup>3</sup> USDA, Supplemental Nutrition Assistance Program: Households Participating, Florida households for June 2017: 1,662,374, <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>, accessed Sept. 13, 2017.





## II. Lifeline Program

The Lifeline program has provided phone service discounts for qualifying low-income consumers since 1985. The stated goal of the program has been to ensure that all Americans have the opportunities and security that phone service brings, including being able to connect to jobs, family and emergency services. Lifeline is part of the federal Universal Service Program, which also includes the high-cost, rural healthcare, and schools and libraries programs. The Lifeline program is available to eligible low-income households in every state, territory, commonwealth, and on Tribal lands.

In accordance with Section 364.10, Florida Statutes, the FPSC has oversight over the Florida Lifeline program. The federal Universal Service Program provides the funding in Florida for the Lifeline program. The rules affecting the Lifeline program are established by the Federal Communications Commission (FCC); however, the FCC has designated the Universal Service Administrative Company (USAC) to be the program's administrator.<sup>4</sup> USAC is responsible for data collection and maintenance, support calculation, and disbursement for the low-income program. USAC's website provides information regarding administrative aspects of the low-income program, as well as program requirements.

On March 31, 2016, the FCC adopted a comprehensive reform and modernization of the Lifeline program.<sup>5</sup> In the 2016 Lifeline Modernization Order, the FCC included broadband as a supported service in the Lifeline program. As a result, qualifying households are eligible to receive up to a \$9.25 discount on their monthly phone or broadband bills. Alternatively, customers may choose a free Lifeline cell phone and limited voice or broadband from certain wireless carriers. While current significant effects of the 2016 Lifeline Modernization Order are discussed in this section, the order also includes reforms that are intended to be implemented over time. The longer-term implementation issues of 2016 Lifeline Modernization Order are discussed in Section V.

As part of the 2016 Lifeline Modernization Order, the FCC also set out minimum service standards for Lifeline-supported services to ensure maximum value for the universal service dollar. Beginning on December 1, 2017, the FCC will require wireless carriers to increase the number of voice minutes from 500 minutes to 750 minutes per month and increase their mobile broadband usage allowance from 500 megabytes to 1 gigabyte (GB) per month at 3G wireless speeds. By comparison, wireline companies seeking reimbursement from the program for fixed broadband will be required to increase both broadband speed and usage allowances from 10 Megabits per second (Mbps) download with a 150 GB usage allowance to 15 Mbps download with 250 GB usage allowance. The FCC has established annual increases in these standards.

In Florida, if an applicant uses the electronic Lifeline Coordinated Enrollment Process to apply for Lifeline, the process will confirm if the applicant is currently participating in the Medicaid

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<sup>4</sup> The Universal Service Administrative Company (USAC) is an independent, not-for-profit corporation designated by the Federal Communications Commission as the administrator of the Universal Service Fund. USAC collects contributions from telecommunications carriers and administers support programs designed to help communities across the country secure access to affordable telecommunications services.

<sup>5</sup> FCC 16-38, WC Docket No. 11-42, Lifeline and Link Up Reform and Modernization, Third Report and Order, released April 27, 2016, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-38A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf), accessed on August 18, 2017.

or SNAP programs.<sup>6</sup> If a program other than Medicaid or SNAP is used for certification, the customer must provide documentation of participation from the administering agency.

If a Lifeline applicant chooses to apply for Lifeline directly with an eligible telecommunications carrier (ETC), the ETC can access the DCF Web Services Interface in real-time to confirm program participation for Medicaid and SNAP.<sup>7</sup> In the 2016 Lifeline Modernization Order, the FCC directed USAC to develop a national eligibility verifier by 2019, which will remove carriers from the process of verifying customer eligibility. The FPSC has also reviewed and updated its rules to comply with changes in the program.

The National Lifeline Accountability Database (NLAD), which is maintained by USAC, is designed to help carriers identify and resolve duplicate claims for Lifeline program supported services and prevent future duplicates. This database provides a means for carriers and state commissions to check, on a real-time and nationwide basis, if the household is already receiving a Lifeline program supported service.

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<sup>6</sup> The electronic Lifeline Coordinated Enrollment Process was developed by the FPSC and DCF to allow an applicant for Medicaid or SNAP to request and receive Lifeline assistance after being approved for the DCF program.

<sup>7</sup> The Web Services Interface allows Florida ETCs a secure gateway into the DCF computer to verify that a Lifeline customer is participating in the Medicaid or SNAP programs administered by DCF. The ETC enters the person's first and last name, date of birth, and last four digits of the person's social security number. The DCF computer responds as to whether the person currently participates in one of the DCF programs without identifying the program because of confidentiality. An ETC must pre-register with DCF to use the Web services interface to ensure security is maintained.

### **III. Lifeline Eligibility and Participation**

Federal rules allow up to a \$9.25 reimbursement per Lifeline-eligible customer per month from USAC to a participating Lifeline carrier. Additional support of up to \$25.00 per month is available only to eligible subscribers living on Tribal lands. Consumers can sign-up for Lifeline service based on either participation in a qualifying program or household income.

#### ***Program-Based Eligibility***

Customers can qualify for Lifeline service in Florida by enrollment in any one of the following programs:<sup>1</sup>

- Supplemental Nutrition Assistance Program (SNAP)
- Medicaid
- Federal Public Housing Assistance
- Supplemental Security Income (SSI)
- Veterans or Survivors Pension Program
- Bureau of Indian Affairs Programs: Tribal Temporary Assistance to Needy Families, Head Start Subsidy and National School Lunch Program

#### ***Income-Based Eligibility***

In addition to the program-based criteria, OPC certifies customer eligibility under the income-based criteria. Effective on December 2, 2016, the 2016 Lifeline Modernization Order allows income based eligibility to be up to 135 percent of the Federal Poverty Guidelines.<sup>2</sup> The Federal Poverty Guidelines used are updated annually by the U.S. Department of Health and Human Services. The 2017 Federal Poverty Guidelines are shown in Attachment A.

#### ***Participation***

The number of subscribers enrolled in Lifeline was 685,864 as of June 30, 2017, a 19 percent decrease from the number of subscribers last year. Figure 1 shows the number of Lifeline subscribers from June 2012 through 2017.

In 2013, the decrease in subscribership was largely attributable to the FCC rules adopted in 2012, which require annual recertification of every subscriber receiving Lifeline discounts. Many customers failed to respond to the ETCs' recertification requests and were removed from the program.

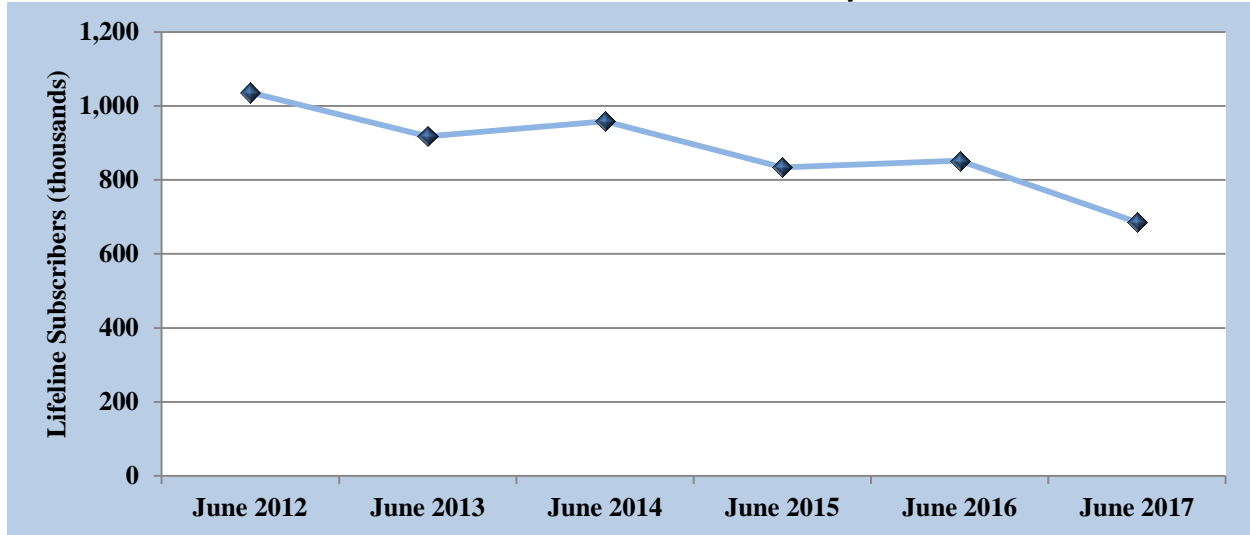
In 2017, the number of Lifeline subscribers declined for both wireless and wireline service providers. The number of Lifeline subscribers who receive service from wireless service providers declined 19 percent from 2016. By comparison, the decline from wireline service providers was 25 percent from 2016. Some providers noted that the decline is a result of an intentional slowdown in acquisition of customers as a result of higher costs attributed to the FCC's new Lifeline service standards.

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<sup>1</sup> FCC 16-38, WC Docket No. 11-42, Lifeline Reform and Modernization, Third Report and Order, released April 27, 2016, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-16-38A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-16-38A1.pdf), accessed on September 26, 2016.

<sup>2</sup> Ibid.

**Figure 1  
Florida Lifeline Subscribership**



Source: Industry responses to FPSC data requests (2012-2017)

Overall Lifeline subscribership declined by 166,391 households, or 19 percent, for the fiscal year ending June 2017. At the same time, the number of Lifeline eligible households decreased by 49,631, or 2.9 percent. The resulting participation rate for 2017 was 41.3 percent.<sup>10</sup> This was a decrease of 8.5 percentage points compared to 2016. Figure 2 shows participation rates in Florida households from June 2014 through June 2017.

Considering the number of households which are eligible to receive Lifeline in Florida and the current participation rate, these numbers continue to demonstrate the need for Lifeline outreach. However this need for greater outreach is at odds with the changing costs associated with offering the expanded Lifeline services. Specifically, some carriers have noted that with the implementation of the FCC’s 2016 Lifeline Modernization Order, it has become increasingly difficult to profitably acquire Lifeline subscribers at the current monthly support amount of \$9.25.

**Figure 2  
Lifeline Participation Rate in Eligible Florida Households**

Year	Lifeline Enrollment	Eligible Households	Percent Participation Rate
June 2014	957,533	1,930,106	49.6%
June 2015	833,426	2,011,166	41.4%
June 2016	852,255	1,712,005	49.8%
June 2017	685,864	1,662,374	41.3%

Source: U.S. Department of Agriculture

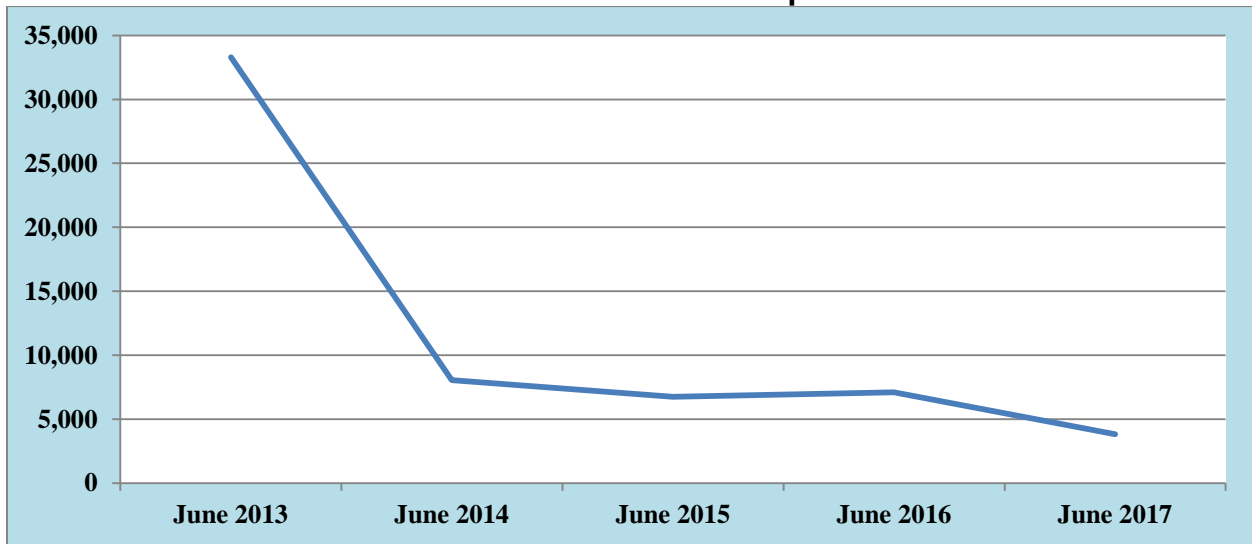
<sup>10</sup> USDA, Supplemental Nutrition Assistance Program: Households Participating, Florida SNAP households for June 2017: 1,662,374, <https://www.fns.usda.gov/pd/supplemental-nutrition-assistance-program-snap>, accessed Sept. 13, 2017.

### **Transitional Lifeline**

Transitioning from Lifeline service means that the consumer’s socio-economic status may have improved, and the customer may have advanced beyond the qualifying eligibility criteria. In accordance with Section 364.105, Florida Statutes, current Lifeline customers who no longer meet eligibility criteria and are removed from Lifeline service are eligible to receive a 30 percent discount on the residential basic local service rate for a period of one year. For example, a former Lifeline customer with a phone bill that includes a \$25.00 basic rate would receive a \$7.50 monthly discount for one year.

Figure 3 presents the number of Transitional Lifeline customers for AT&T, Frontier (formerly Verizon), and CenturyLink for June 2013 through June 2017. The large increase in the number of Transitional Lifeline participants in 2013 is attributable to customers being de-enrolled from the Florida Lifeline program due to the new FCC requirement to annually recertify Lifeline customers.<sup>11</sup>

**Figure 3**  
**Transitional Lifeline Participation**



Source: Industry responses to FPSC data requests (2013-2017)

<sup>11</sup> In 2013, AT&T reported 32,783; CenturyLink reported 488; and Verizon reported 23. By comparison in 2016, AT&T reported 6,033; CenturyLink reported 747; and Frontier Florida (f/k/a Verizon) reported 329.



## IV. Lifeline Providers

As part of the Telecommunications Act of 1996, Congress allows state commissions to designate carriers as ETCs if they meet certain requirements.<sup>12</sup> Conversely, a state commission also has the authority to rescind the ETC status of any ETC that does not follow the requirements of the Lifeline Assistance Program. Currently, the FPSC only evaluates wireline ETC applications, while wireless ETC applications are evaluated by the FCC.<sup>13</sup>

To qualify as an ETC, a telecommunications carrier must offer services that are supported by federal universal service support mechanisms.<sup>14</sup> The carrier must advertise the availability of such services and charges. These services must be offered either using its own facilities or a combination of its own facilities and another carrier’s resold service.

The FPSC has determined that before designating a telecommunications carrier as an ETC, it should make an affirmative determination that such designation is in the public interest, regardless of whether the applicant seeks designation in an area served by a rural or non-rural carrier.<sup>15</sup> A company applying and qualifying for designation as an ETC must demonstrate good management and legitimate business practices to successfully administer the Lifeline program.<sup>16</sup>

In 2011, the FCC took a technology-neutral approach and determined that ETCs can use any platform to provide voice service. As a result, cable and wireless companies could seek ETC designation and request support from the program. Figure 4 shows the 18 companies that had ETC status and participated in the Lifeline program in Florida as of June 30, 2017. Attachment B represents the historic enrollment figures for the Lifeline program listed by each of the ETCs.

**Figure 4**  
**ETCs Participating in Florida Lifeline Program**

Access Wireless (i-wireless)	ITS Telecommunications
Assurance Wireless (Virgin Mobile)	Knology of Florida, Inc. (WOW!)
AT&T Florida (AT&T)	NEFCOM
CenturyLink	Quincy Telephone Company (TDS)
Cox Florida Telecom, LP	SafeLink Wireless (TracFone)
FairPoint Communications	Smart City Telecom
Frontier Communications of the South	Tele Circuit Corporation
Frontier Florida, LLC (formerly Verizon)	T-Mobile Wireless
Global Connection Inc.	Windstream Florida, Inc.
Phone Club Corporation	

Source: Industry responses to 2017 FPSC data requests

<sup>12</sup> Section 214(e)(2) of the Telecommunications Act of 1996.

<sup>13</sup> The Florida 2011 Legislature (HB 1231), removed the FPSC authority to designate ETC wireless providers. Effective July 1, 2012, wireless providers must directly apply for Florida ETC designation with the FCC.

<sup>14</sup> 47 C.F.R. §54.101(a)(1); Those services include: (1) voice grade access to the public switched network, (2) minutes of use for local service provided at no additional charge to end users, (3) toll limitation to qualifying low-income consumers, and (4) access to the emergency services 911 and enhanced 911 services.

<sup>15</sup> Docket No. 120165-TP, Order No. PSC-12-0500-PAA-TP, issued September 28, 2012.

<sup>16</sup> 47 C.F.R. §54.201(h).

Prior to August 15, 2016, resellers could sell Lifeline discounted service from an ETC through a resale agreement. The ETC would receive the support from USAC, and reduce the price of service to the reseller by the corresponding amount. The FCC’s 2015 Lifeline Reform Order amended the Lifeline rules to eliminate Lifeline reimbursement for non-ETC resellers provisioning service through resale agreements out of concern of possible waste and abuse of program funds.<sup>17</sup> As a result, some affected carriers have left the Florida market. The FCC did provide a way for affected carriers to become an ETC and provide Lifeline service by filing a compliance plan that addresses the FCC’s concerns regarding potential waste and abuse of the program. Specifically, such non-facilities based carriers must file a plan that demonstrates:

- 1) Commitment and ability to provide the supported services throughout the designated area;
- 2) Ability to remain functional in emergency situations;
- 3) Ability to satisfy consumer protection and service quality standards;
- 4) Provision of local usage comparable to that offered by the incumbent local exchange companies (ILEC).

As previously mentioned, the FPSC no longer has authority to designate wireless ETCs in the State of Florida. Wireless ETC applications for Florida are now filed directly with the FCC. Figure 5 shows the 35 Florida wireless ETC petitions pending at the FCC. Some of these companies applied with the FCC as early as August 2011. Each company’s respective initial wireless ETC petition is included.

**Figure 5**  
**Florida Pending Wireless ETC Designation Petitions at FCC**  
(as of June 2017)

Airvoice Wireless (2/13)	NewPhone Wireless (9/12)
American Broadband (6/13)	Pinnacle Telecommunications (2/13)
Amerimex (2/13)	Q Link Wireless (8/15)
AmTel (1/13)	Sage Telecom Communications, LLC (8/13)
Assist Wireless (1/13)	SelecTel Wireless (8/15)
Blue Jay Wireless (5/12)	TAG Mobile (6/11)
Boomerang Wireless (8/16)	TNT Wireless (1/13)
Budget PrePay, Inc. (8/11)	Tele Circuit Network (7/12)
Cintex Wireless (5/12)	Telrite (4/12)
Consumer Cellular (4/12)	Tempo Telecom (11/14)
EZ Reach Mobile (5/12)	TerraCom (4/12)
Free Mobile, Inc. (9/12)	Total Call Mobile (4/13)
Global Connection (4/12)	True Wireless (5/12)
IM Telecom, LLC (1/16)	TX Mobile (11/12)
Kajeet (3/12)	Vast Communications (4/13)
LTS of Rocky Mount (10/12)	You Talk Mobile (2/13)
Millennium 2000 (4/13)	ZING PCS (12/12)
Mobile Net POSA (5/14)	

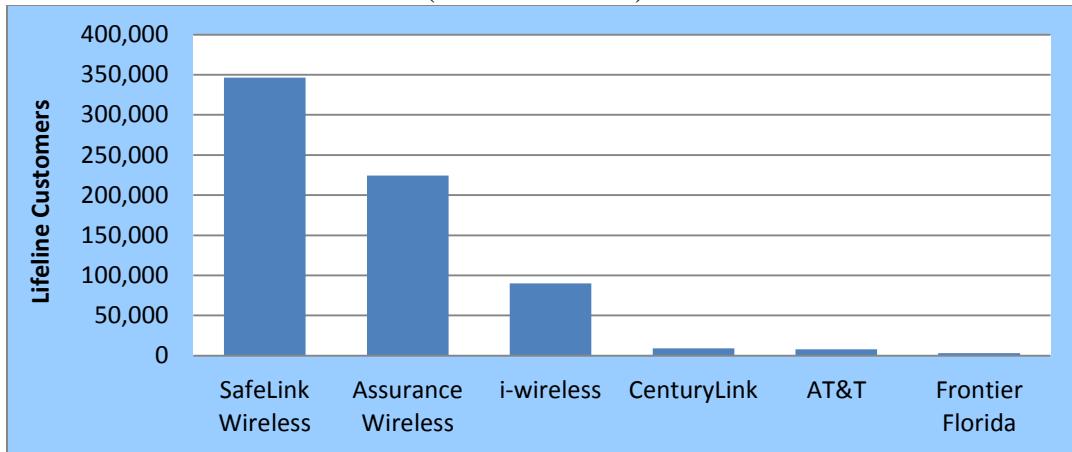
Source: FCC Lifeline Compliance Plans & ETC Petitions

<sup>17</sup> FCC 15-71, WC Docket No. 11-42, Lifeline Reform and Modernization, Second Report and Order, released June 22, 2015, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-15-71A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf), accessed on September 28, 2016.



Figure 6 shows the six Florida ETCs with the largest number of Lifeline customers as of June 2017. These ETCs represent 99 percent of the total Lifeline customer participation.

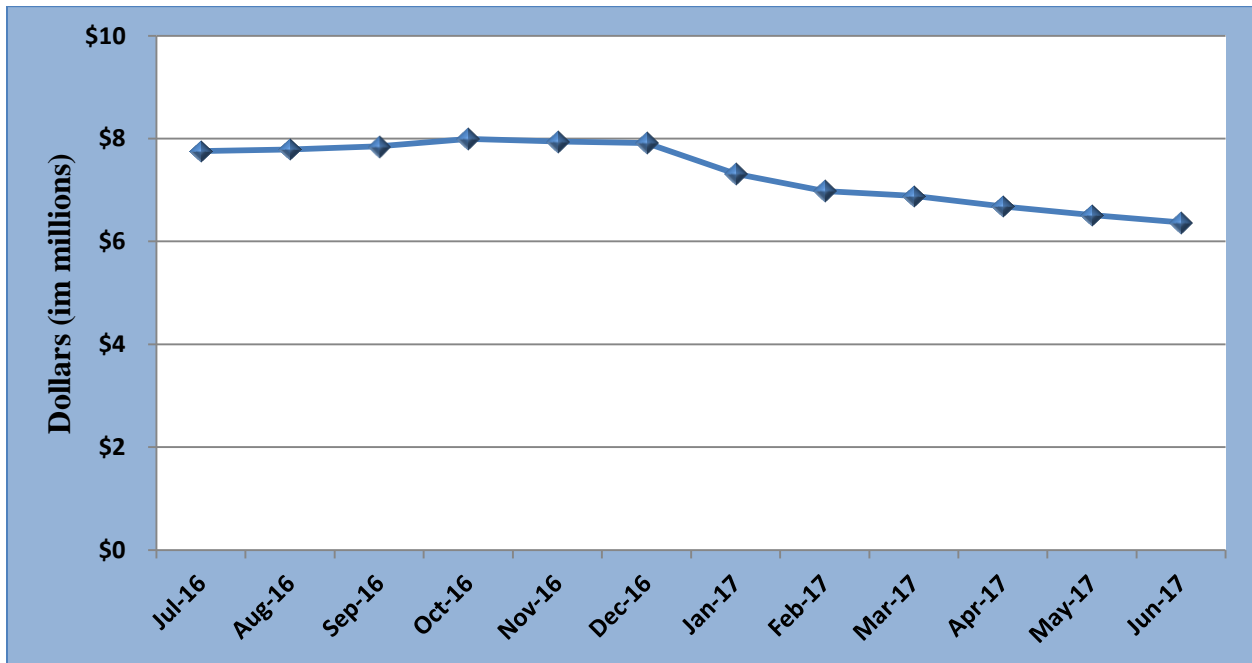
**Figure 6**  
**Top Six Florida Lifeline ETCs**  
 (as of June 2017)



Source: Industry responses to 2017 FPSC data requests

Figure 7 reflects USAC Lifeline disbursements to Florida ETCs between July 2016 and June 2017. The total amount disbursed during this 12 month period was \$87,989,539, an average of \$7.3 million per month. These amounts also include support corrections or true-ups from prior months when errors are made.

**Figure 7**  
**USAC Low Income ETC Disbursements to Florida Providers**



Source: USAC Disbursements Florida July 2016-June 2017



## **V. Lifeline Enrollment Process and Improvement**

### ***A. Activities. Lifeline Electronic Coordinated Enrollment Process***

Florida has in place a streamlined, efficient, and verifiable Lifeline Electronic Coordinated Enrollment process. This advanced process involves a computer interface between the FPSC and the DCF for Lifeline applicants who currently participate in the Medicaid and SNAP program. The FCC and USAC have commended the Florida Lifeline Electronic Coordinated Enrollment process and said that it is a good example of an enrollment process that states should use for the Lifeline coordinated enrollment process.<sup>18</sup>

### ***B. Florida Public Service Commission Activities***

#### **FPSC Continues Actions to Prevent Waste, Fraud and Abuse of the Federal Universal Service Fund**

Florida continues to enforce safeguards to prevent waste, fraud, and abuse of the Universal Service Fund. Florida's participation with the National ETC State Coordinating Group enables information sharing with all states to monitor prospective and existing ETC activities across the country.<sup>19</sup> The FPSC strives to protect the integrity of the Lifeline program in the State of Florida and takes appropriate enforcement action when necessary. The FPSC has statutory authority to grant wireline ETC designations, and can also revoke ETC status when warranted. Unlawful and inappropriate federal Universal Service Fund disbursements are inconsistent with public trust and negatively impacts states like Florida, which contribute more into the Universal Service Fund than it receives. Therefore, the FPSC monitors federal Universal Service Funds disbursed to Florida ETCs to ensure that funds are being disbursed and expended according to state and federal regulations and guidelines.

#### **AT&T Partial ETC Relinquishment**

In July 2017, the FPSC granted AT&T partial relinquishment of its ETC designation in Florida. AT&T receives high-cost funding from the FCC, which obligates AT&T to remain an ETC and offer Lifeline discounts to eligible customers in those high-cost areas for the duration of the funding term.<sup>20</sup> Thus, AT&T's petition sought to retain its ETC designation in high-cost areas and relinquish its ETC designation in all other portions of its remaining service territory. According to AT&T, its request for relinquishment was driven by the changes in the telecommunications market. AT&T asserted that over the years customers have been replacing traditional wireline residential voice services with wireless, Voice over Internet Protocol and other competitive options.

AT&T is the first ILEC to request ETC relinquishment in Florida. At the end of 2016, AT&T Florida had 7,219 Lifeline customers in the relinquishment area. According to federal law, prior

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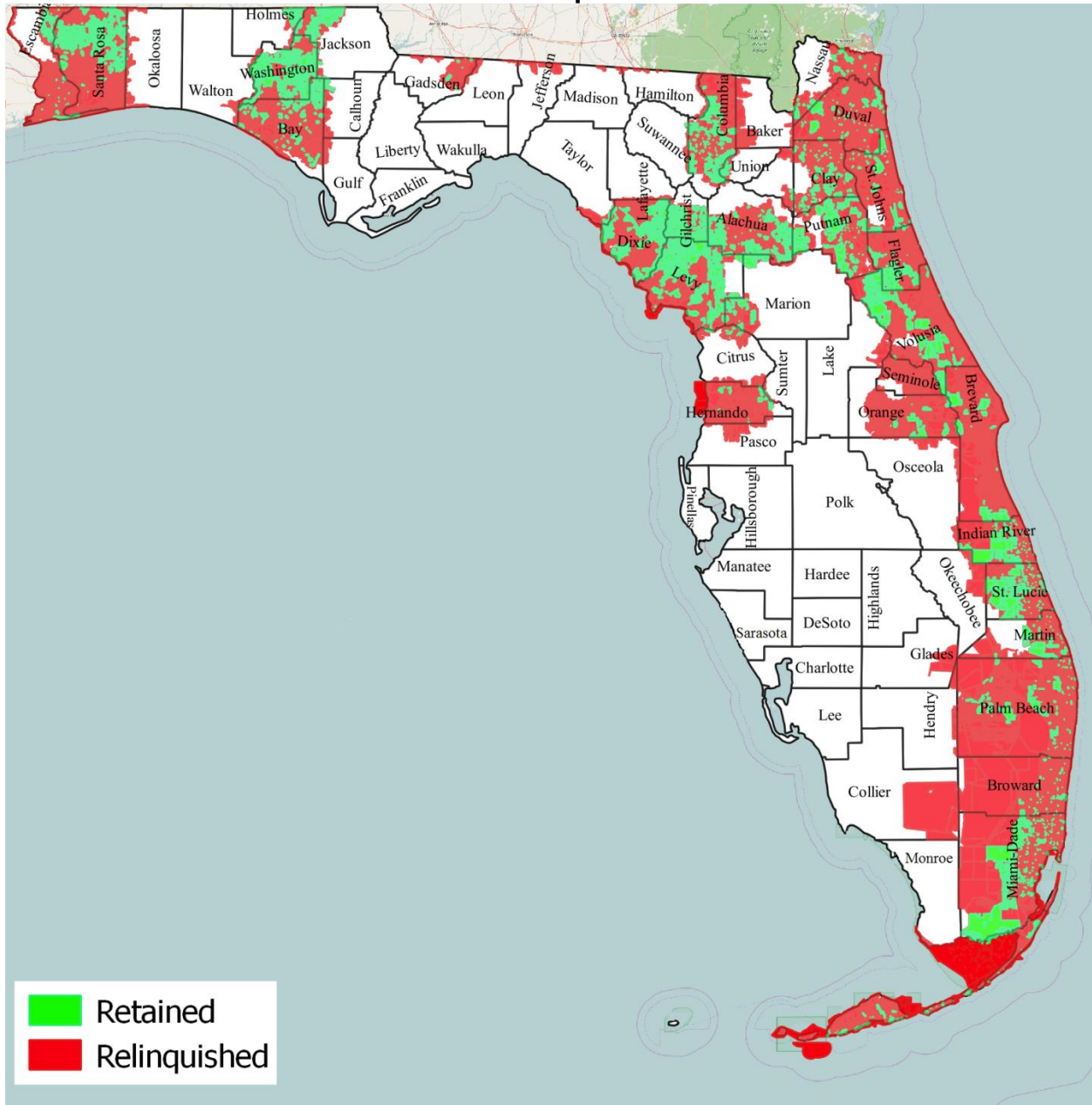
<sup>18</sup> FCC 15-71, WC Docket No. 11-42, Lifeline Reform and Modernization, Second Report and Order, released June 22, 2015, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-15-71A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-15-71A1.pdf), accessed August, 17, 2017, Footnote 215.

<sup>19</sup> The ETC State Coordinating group includes state commission members from all fifty states, the District of Columbia, and the Commonwealth of Puerto Rico.

<sup>20</sup> FPSC Order No. PSC-2017-0290-PAA-TP, Docket Nos. 20170082-TP, Request for relinquishment of partial eligible telecommunications carrier (ETC) status, by BellSouth Telecommunications, LLC d/b/a AT&T Florida, issued August 7, 2017.

to permitting an ETC's relinquishment state commissions must require the remaining ETCs to ensure that existing customers will continue to be served.<sup>1</sup> The FPSC's review and analysis determined that in each of AT&T Florida's service territories where the company was requesting relinquishment, customers would continue to be served by one or more ETCs. Figure 8 is a map of AT&T's retained and relinquished areas.

**Figure 8**  
**AT&T Lifeline Relinquishment Areas**



<sup>1</sup> 47 U.S.C. §214(e)(4).

### C. Federal Communications Commission Activities

#### 2016 Lifeline Modernization Reform Order

On April 27, 2016, the FCC released its Lifeline Modernization Order. In this Order, the FCC took steps to both expand services supported and also limit the qualifying criteria consumers can use to sign up for Lifeline services. Some of the FCC’s new rules became effective in December 2016. Specific changes regarding qualifications can be found in Section III of this report. Consumers that are already enrolled in the Lifeline program will continue to be eligible for up to one year from their initial application or recertification. In addition to reforming eligibility, the FCC also refocused the program goal on broadband adoption, encouraging adoption of minimum broadband standards by tying compliance with funding eligibility.<sup>22</sup> Figure 9 below outlines the FCC’s dates for new phased-in standards for wireline and wireless services.

**Figure 9**  
**Mobile and Fixed Service Standards**

Effective Dates	Mobile Voice	Mobile Broadband	Fixed Broadband
12/2/16 to 11/30/17	500 Minutes	Usage Allowance: 500 MB	Speed 10/1 Usage Allowance: 150 GB
12/1/17 to 11/30/18	750 Minutes	Usage Allowance: 1 GB	Speed 15/2 Usage Allowance: 250 GB
12/1/18 to 11/30/19	1,000 Minutes	Usage Allowance: 2 GB	Updated annually based on usage reported to FCC
12/1/19 to 11/30/20	1,000 Minutes	Updated annually based on usage reported to FCC	

Source: FCC, “Lifeline Program for Low-Income Consumers,” <https://www.fcc.gov/general/lifeline-program-low-income-consumers#block-menu-block-4>, accessed August 14, 2017.

The FCC states that to be sustainable and achieve its goals of providing low-income consumers with robust, affordable and modern service offerings, a forward-looking Lifeline program must focus on broadband services. Therefore, the FCC concluded it is necessary, following an extended transition period, to re-evaluate whether Lifeline will continue to apply to a voice-only offering. The FCC currently plans the phase out of voice-only support by December 2021. The FCC did include an exception in those census blocks with only one Lifeline provider. The Lifeline program will continue to support voice services when bundled with a broadband service that meets the FCC’s minimum service standards. Figure 10 outlines the FCC’s phase down schedule.

**Figure 10**  
**Lifeline Support Phase Down Schedule**

Effective Dates	Fixed Voice	Mobile Voice	Fixed Broadband	Mobile Broadband
Through 11/30/19	\$9.25	\$9.25	\$9.25	\$9.25
From 12/1/19 to 11/30/20	\$7.25	\$7.25	\$9.25	\$9.25
From 12/1/20 to 11/30/21	\$5.25	\$5.25	\$9.25	\$9.25
After 11/30/21	\$0 <sup>23</sup>	\$0	\$9.25	\$9.25

Source: FCC 2016 Lifeline Modernization Order (FCC 16-38)

<sup>22</sup> Upon written notification to the FCC, certain ETCs do not have to comply with the broadband standards.

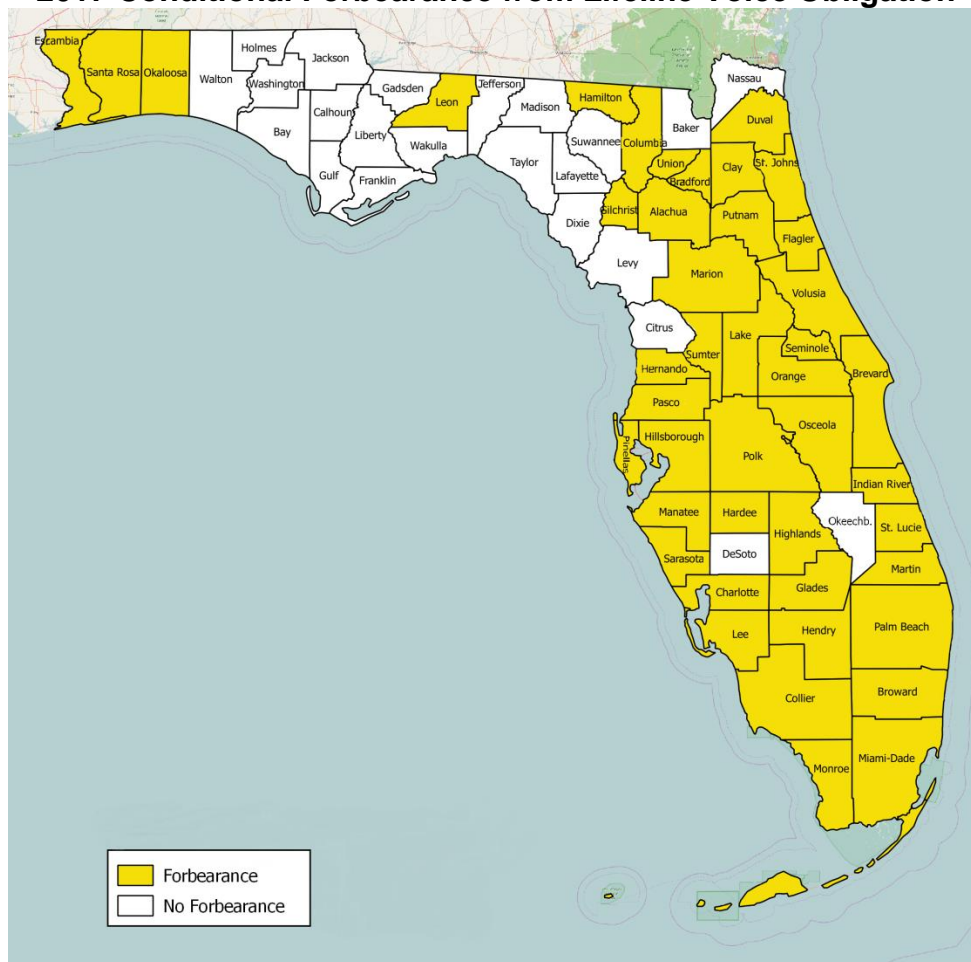
<sup>23</sup> If determined that a voice-only service is no longer eligible for Lifeline support.

## Forbearance from Lifeline Voice Obligation

The 2016 Lifeline Modernization Order established forbearance from Lifeline voice service obligations in targeted areas where certain competitive conditions are met. In particular, the FCC granted forbearance from high-cost/Lifeline ETCs' obligation to offer and advertise Lifeline voice service in counties where the following conditions are met: (a) 51 percent of Lifeline subscribers in the county are obtaining broadband Internet access service; (b) there are at least three other providers of Lifeline broadband Internet access service that each serve at least five percent of the Lifeline broadband subscribers in that county; and (c) the ETC does not actually receive federal high-cost universal service support.

The counties identified in Figure 11 meet the first two conditions; for ETCs that are receiving high-cost support in these counties, the forbearance applies only in areas within the county where the ETC does not receive high-cost support.<sup>24</sup> The FCC noted that this forbearance does not grant relief from the Lifeline voice service obligation for Lifeline subscribers that the high-cost/Lifeline ETC currently serves. Additionally, this forbearance does not preclude ETCs from electing to provide and receive reimbursement for Lifeline-discounted voice service.

**Figure 11**  
**2017 Conditional Forbearance from Lifeline Voice Obligation**



<sup>24</sup> FCC, Public Notice, WC Docket No. 11-42, DA 17-684, released July 17, 2017.

## **National Lifeline Eligibility Verifier**

The FCC's Order directed USAC to develop a national Lifeline eligibility verifier (national verifier) to determine all subscriber eligibility starting in 2017. The national verifier will provide electronic and manual methods to determine initial subscriber eligibility, conduct annual recertification, populate the Lifeline database and provide support payments to providers. The FCC's actions intend to achieve the following:

- Allows a National Verifier to act as a neutral third-party entity that removes the opportunity for providers to enroll ineligible subscribers
- Refines the list of federal programs that may be used to validate Lifeline eligibility to those that support electronic validation, are most accountable, and best identify people needing support (SNAP, SSI, Medicaid, Veterans and Survivors Pension, Tribal), along with income-based eligibility
- Increases transparency by making program data publicly available and understandable, including subscriber counts by provider and uniform disclosure of annual subscriber recertification data

USAC has announced that upon its initial launch on December 5, 2017, the National Verifier will begin to verify eligibility for consumers in the following states: Colorado, Mississippi, Montana, New Mexico, Utah, and Wyoming.<sup>25</sup> By December 31, 2019, the FCC expects the National Verifier to be live in all states and territories. As the National Verifier is deployed, the responsibility to verify eligibility will transition from ETCs or state administrators to the National Verifier. There are implementation concerns to be settled before Florida's transition to the National Verifier.

## **2016 Recertification of Florida Lifeline Subscribers**

The FCC adopted a set of uniform recertification procedures that all ETCs must perform annually to verify the ongoing eligibility of their Lifeline subscribers.<sup>26</sup> To comply with the annual requirement for 2016, all ETCs and state Lifeline administrators were required to recertify the eligibility of their Lifeline subscriber base by the end of 2016, and report the results to USAC by January 31, 2017. Subscribers failing to respond to recertification efforts had to be de-enrolled from Lifeline. As a result of the 2016 recertification process, 53,059 customers, or six percent, were de-enrolled from the Florida Lifeline program.<sup>27</sup> Of the 53,059 customers de-enrolled, 45 percent were as a result of Lifeline subscribers not responding to the recertification request. Results of the recertification by company are presented in Attachment C.

ETCs have the option of recertifying subscribers in one of three ways. The first is to verify program or income-based eligibility where an ETC can query the available database to confirm the subscriber's continued eligibility. In the absence of a database, the ETC must recertify the

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<sup>25</sup> Specific qualifying programs with automated data sources by state are: Colorado – SNAP, Medicaid, Federal Public Housing; Mississippi – SNAP, Federal Public Housing; Montana – Federal Public Housing; New Mexico – SNAP, Medicaid, Federal Public Housing; Utah – SNAP, Medicaid, Federal Public Housing; Wyoming – Federal Public Housing.

<sup>26</sup> 47 C.F.R. § 54.410(f).

<sup>27</sup> By comparison, the 2014 recertification processes de-enrolled 142,248 customers or 14 percent of participants from the Florida Lifeline program.



continued eligibility of a subscriber by writing, phoning, text messaging, emailing, Interactive Voice Response, or otherwise through the Internet using an electronic signature.

The third method of recertifying Lifeline customers would be to have the ETC elect USAC to perform Lifeline recertification for their subscribers. USAC recertifies subscribers by mailing each subscriber a letter that provides the subscriber a notice, informing the subscriber that the subscriber has 30 days to recertify the subscriber's continued eligibility to receive Lifeline service or the subscriber will be de-enrolled from the Lifeline program. The letter would also explain the recertification process and how the subscriber may confirm his or her eligibility. Subscribers also would receive a call or text message during the 30-day period to prompt a response. Any subscriber response submitted after the 30-day deadline will not be processed, and the subscriber would be considered ineligible for the program and de-enrolled.

### **Duplicate Lifeline Support**

Eligible consumers can only receive one Lifeline-supported service per household.<sup>28</sup> If there are two households residing at one address and each desires to participate in Lifeline, each applicant has to complete a one-per-household worksheet to demonstrate that each applicant is living in a separate economic unit and not sharing living expenses (bills, food, etc.) or income with another resident.<sup>29</sup>

The FCC directed USAC to establish a database to both eliminate existing duplicative support and prevent duplicative support in the future.<sup>30</sup> To prevent waste in the Universal Service Fund, the FCC created a National Lifeline Accountability Database (NLAD) and mandated its use to ensure that multiple ETCs do not seek and receive reimbursement for the same Lifeline subscriber. NLAD conducts a nationwide real-time check to determine if the consumer or another person at the address of the consumer is already receiving a Lifeline program-supported service. Florida ETCs were operational on NLAD starting March 6, 2014. At Florida's request, the FCC has agreed to allow states to have read-only access to this database to help prevent waste, fraud, and abuse of the Lifeline program.

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<sup>28</sup> 47 C.F.R. § 54.409(c).

<sup>29</sup> A household Lifeline eligibility pre-screening tool is available at [www.lifelinesupport.org](http://www.lifelinesupport.org).

<sup>30</sup> FCC 12-11, WC Docket No. 11-42, Lifeline Reform and Modernization, Report and Order, released Feb. 6, 2012, [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-12-11A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-12-11A1.pdf), accessed Oct. 27, 2016.



## **VI. Lifeline Promotion Activities**

Promotional activities in 2017 featured National Lifeline Awareness Week, National Consumer Protection Week, Older Americans Month, and ongoing “grassroots” efforts to increase awareness and enrollment in the Lifeline program. Figure 12 represents the various events and locations where Lifeline information was shared in Florida as of July 2017.

To prepare for changes associated with the implementation of the 2016 Lifeline Modernization Order, Florida PSC staff has participated in the National Association of Regulatory Utility Commissioners (NARUC) / USAC Lifeline Task Force and the State Lifeline Task Force calls since October 2016. During the calls, USAC has made announcements about the National Verifier and the National Lifeline Accountability Database and discussed the recertification process and recordkeeping implications. The Lifeline Across America Working Group that included representatives from the FCC, NARUC, and National Association of State Utility Consumer Advocates has been inactive. The working group agreed no further conference calls and/or promotional planning was necessary until the new federal Lifeline guidelines were implemented. The working group’s primary national effort was to ensure that low income families and individuals are aware of the Lifeline program and understand the participation requirements, including annual recertification and only one Lifeline discount per household is allowed. Supported by the working group, Lifeline Awareness Week promotes these messaging efforts.

### ***National Lifeline Awareness Week (September 10-16, 2017)***

Lifeline program changes from the April 2016 FCC Modernization Order caused NARUC to cancel its annual Lifeline Awareness Week last year. This year, while the FCC and USAC work to implement the new guidelines, NARUC decided to observe Lifeline Awareness Week, again in September for those states able to participate. Staff scheduled “Stay Connected Florida!” Lifeline Awareness Week events throughout the state; however, due to Hurricane Irma, these events had to be canceled. During the last week in September, the FPSC held rescheduled Lifeline Awareness Week events in Sarasota and Wakulla Counties to promote the modernized Lifeline program.

### ***National Consumer Protection Week and Other Community Events***

The FPSC seeks existing community events as well as new venues and opportunities where Lifeline educational materials can be distributed and discussed with consumers. National Consumer Protection Week, March 5-11, 2017, was a good back drop for Lifeline outreach activities. An annual consumer education campaign, National Consumer Protection Week encourages consumers to take advantage of their consumer rights. For this year’s event, FPSC Chairman Julie Brown highlighted the importance of consumer education and awareness about utility services and avoiding potential scams. With social media reshaping how news is received, the FPSC launched a Twitter campaign, #PSCCelebratesConsumersNCPW. Each day, the campaign featured a consumer tip from PSC Commissioners and highlighted the FPSC’s educational activities. During the 19th Annual National Consumer Protection Week, the FPSC made a total of seven presentations to consumers in Winter Springs, Winter Park, Orlando, Hollywood, Miramar, and Hallandale Beach, showing them how to save money through energy

and water conservation and how to sign up for the Lifeline Assistance telephone and broadband discount program, if they qualify.

For the sixth year, the FPSC participated in a national project called Older Americans Month – celebrated each May to honor and recognize older Americans for their contributions to families, communities, and society. “Age Out Loud” was this year’s theme. The FPSC hosted five educational sessions, distributing Lifeline, conservation, and fraud prevention information at senior communities in Duval, Hillsborough, Leon, and Marion Counties.

Each month, the FPSC also names a valued partner agency or organization as a “Helping Hand,” for helping raise public awareness about the Lifeline program, energy and water conservation, and utility impersonation scams. One ongoing FPSC partner is the Jacksonville Senior Expo, where the record-breaking 7,900 seniors who attended had access to FPSC staff and Commission brochures and publications.

**Figure 12**  
**Commission Lifeline Promotion in Florida**

<b>Lifeline Events and Locations</b>	
2017 Elder Abuse and Fraud Prevention Summit–Tallahassee Community College	Lynn Haven Senior Center
2017 World Elder Abuse Awareness Day–Quincy	Marion Senior Services Center
34th Annual Children’s Day–FL Museum of History	Mary L. Singleton Center
Active Living Expo	Miramar Senior Center
Austin Hepburn Senior Center	New Mt. Zion–Feeding Northeast Florida–Jacksonville
Barbara Washington Senior Center	Osceola Senior Center
Bayshore Dining Center–Tampa	Putnam County School–Feeding Northeast Florida - Crescent City
El Beth–Feeding Northeast Florida–Jacksonville	Renaissance Senior Center
Feeding Northeast Florida	Senior Citizens Council of Madison County
Fraud Prevention Seminar–Pensacola	Senior Day at the Capitol
Fred Lippman Multi–Purpose Center	Sunset Lake Senior Center
Jacksonville Senior Expo	Suwanee County Health and Wellness Fair at Advent Christian Village in Dowling Park
Jefferson County Senior Citizens Center	Suwanee County Health and Fitness
Kings Arm–Tampa	Suwanee River Economic Council–Lake City
L. Claudia Allen Senior Center	Taylor Senior Citizens Center–Perry
Lafayette County Senior Center	Town N’ Country and Oaks Senior Center
LifeStyle Enrichment Center–Lake City	Wealth of Information Fair–Lake City
Light of the World–Feeding Northeast Florida–Jacksonville	William Beardall Senior Center
Lunch and Learn–Chaires Senior Center	Winter Park Senior Center
Lunch and Learn–Ft. Braden	Winter Springs Senior Center
Lunch and Learn–Wildwood Presbyterian	Woodville Senior Center
Lunch and Learn–Woodville Senior Center	

Source: Florida Public Service Commission, Office of Consumer Assistance & Outreach

### ***Library Outreach Campaign***

Each year the FPSC provides educational packets, including FPSC publications and Lifeline brochures and applications in English, Spanish, and Creole to Florida public libraries across the state for consumer distribution. The FPSC's Library Outreach Campaign reached 555 state public libraries and branches in 2017. For the third year, the FPSC sent the materials via a CD that included a print-ready copy of FPSC brochures for easy reproduction. Following the Campaign, many libraries' requests for additional publications have been filled.

### ***Community Services Block Grant Program***

The Florida Department of Economic Opportunity (DEO) includes Lifeline services as an indicator in its work plan, allowing Community Action Agencies to report the number of clients they help to secure Lifeline services. During the October 1, 2015–September 30, 2016 reporting period, 1,696 households applied for Lifeline benefits through local Community Action Agencies, providing \$230,114 in benefits to clients. For the reporting period, 12 of the 27 Community Action Agencies provided Lifeline enrollment services to clients.

### ***Income-Based Lifeline Applicants***

OPC provides assistance to consumers applying for Lifeline Assistance based upon income level. During the July 2016–June 2017 reporting period, OPC received over 4,000 calls from potential applicants seeking assistance and processed 11,786 applications. OPC verifies consumers' income eligibility for the following telecommunication carriers: Access Wireless, Assurance Wireless, AT&T Landline, CenturyLink Landline, Frontier Landline (formerly Verizon), SafeLink Wireless, and T-Mobile Wireless.

### ***Ongoing Lifeline Outreach***

Ensuring easy access to Lifeline information through the agencies and organizations having regular interaction with eligible consumers is crucial to the Lifeline awareness effort. The FPSC partners with many agencies year-round to make sure eligible consumers know about Lifeline and know how to apply. Additionally, the FPSC schedules and conducts two monthly community events to promote Lifeline. Each month, the FPSC sends a cover letter and informational packet to two organizations to encourage continued Lifeline outreach to their eligible clientele.

### ***Lifeline Partners***

The local, state, and federal agencies, organizations, businesses, and telecommunications companies listed in Attachment D are involved in the collaborative effort to increase awareness and participation in the Lifeline program. These Lifeline Partners have continued to develop new partnerships, participate in local community events, offer training sessions, provide updates about program changes, and supply brochures and applications.



## VII. Conclusion

As of June 30, 2017, 685,864 eligible customers participated in the Florida Lifeline Program. The success of the Florida Lifeline program can be attributed to the continued partnership between the FPSC, DCF, OPC, and other agencies around the state that assist Florida low-income families.

As a result of Florida Lifeline participation, USAC Low Income disbursements for Florida ETCs for the 12-month period ending June 2017 totaled approximately \$88 million. These dollars enabled Florida citizens qualifying for Lifeline benefits to receive discounted monthly bills for voice or broadband service with a credit of up to \$9.25, or a free Lifeline wireless phone with free monthly minutes and/or mobile measured broadband. This year, wireless providers such as SafeLink Wireless, Assurance Wireless, and Access Wireless, provided the majority of Lifeline services in Florida as they have for the last several years.

The FPSC continues to focus on enrollment process issues as a means of increasing participation. As previously discussed in this report, specific enrollment process initiatives include the following:

- FPSC Lifeline Coordinated Online Application Process
- FPSC/DCF Coordinated Lifeline Enrollment
- Annual Recertification Procedures
- DCF Certification/Verification Web Services Interface
- National Lifeline Accountability Database

Efforts to increase Lifeline participation can be separated into two categories: consumer outreach and enrollment process. The FPSC, in cooperation with other state and federal agencies, the OPC, ETCs, and other organizations, remains engaged in extensive outreach efforts. Because most of these efforts run concurrently, measuring the impact of any single activity on Lifeline participation is difficult. Nevertheless, outreach efforts overall are having a positive outcome and should be continued. Outreach efforts are also being expanded to include more competitive local exchange carrier and wireless ETCs.

The FPSC remains committed to enabling low-income households in Florida to obtain and maintain basic local telephone service to help them find jobs, contact community services, call doctors and schools, and connect to family and friends. The FPSC will continue to identify and find solutions to barriers that may prevent Lifeline from achieving greater success for the benefit of Florida's low-income consumers. The FPSC will also continue its work on streamlining the Lifeline enrollment process and refining the FPSC/DCF Lifeline coordinated application procedure in Florida so that applying for the Lifeline program is easier and faster than in previous years while implementing the new FCC requirements.



**Attachment A  
2017 U.S. Poverty Guidelines**

Persons in family / household	2017 U.S. Federal Poverty Guidelines	135% of Federal Poverty Guidelines	Monthly income at 135% of Federal Poverty Guidelines
1	\$12,060	\$16,281	\$1,357
2	\$16,240	\$21,924	\$1,827
3	\$20,420	\$27,567	\$2,297
4	\$24,600	\$33,210	\$2,768
5	\$28,780	\$38,853	\$3,238
6	\$32,960	\$44,496	\$3,708
7	\$37,140	\$50,139	\$4,178
8	\$41,320	\$55,782	\$4,649

For families/households with more than 8 persons, add \$4,180 for each additional person.

Source: Department of Health and Human Services, Annual Update of the Department of Health and Human Service Poverty Guidelines. Federal Register Notice, January 31, 2017.

<https://www.federalregister.gov/documents/2017/01/31/2017-02076/annual-update-of-the-hhs-poverty-guidelines>

**Attachment B**  
**Lifeline Net Enrollment and Year-to-Year Net Growth Rate**

	ETCs	June 2014	June 2015	Net Growth Rate	June 2016	Net Growth Rate	June 2017	Net Growth Rate
Wireless	SafeLink	543,174	470,695	-13%	405,506	-14%	346,488	-15%
	Assurance	249,664	208,902	-16%	232,481	11%	224,282	-4%
	i-wireless/ Access	97,044	106,440	10%	179,429	69%	89,904	-50%
	T-Mobile*	3,091	2,110	-32%	762	-64%	630	-17%
Incumbent Wireline	CenturyLink	18,756	16,163	-14%	12,528	-22%	9,108	-27%
	AT&T	28,156	18,302	-35%	11,404	-38%	7,871	-31%
	Frontier Florida	8,245	4,721	-43%	3,896	-17%	3,116	-20%
	Windstream	4,348	2,746	-37%	2,436	-11%	2,004	-18%
	FairPoint	1,307	671	-49%	526	-22%	561	7%
	NEFCOM	545	458	-16%	286	-38%	366	28%
	TDS Telecom	406	264	-35%	179	-32%	138	-23%
	ITS Telecom	77	80	4%	86	8%	69	-20%
	Frontier of the South	84	46	-45%	28	-39%	26	-7%
	Smart City	12	7	-42%	11	57%	4	-64%
Competitive Wireline	Cox Telecom	522	659	26%	689	5%	675	-2%
	TeleCircuit	666	337	-49%	646	92%	321	-50%
	Knology d/b/a WOW	294	138	-53%	79	-43%	58	-27%
	Global Connection	16	8	-50%	3	-63%	95	3067%
	Phone Club	n/a	n/a	n/a	n/a	n/a	148	n/a
	ETCs which Relinquished Designation	468	184	-61%	0	-100%	0	0%
<b>Total</b>		<b>957,533</b>	<b>833,426</b>	<b>-13%</b>	<b>850,975</b>	<b>2%</b>	<b>685,864</b>	<b>-19%</b>

Sources: FPSC data requests (2014-2017). \*Data from USAC.



**Attachment C**  
**Lifeline Subscriber Recertification**  
(as of February 2016)

	ETCs	Lifeline Subscribers	No Subscriber Recertification Response	Subscribers Reported - No Longer Eligible	Finding of Ineligibility	Total Subscribers De-Enrolled	Percent of Lifeline Subscribers De-Enrolled
Wireless	SafeLink	426,216	1,075	0	26,442	27,517	6%
	Assurance	243,861	9,025	996	0	10,021	4%
	i-wireless/ Access	138,148	5,900	13	0	5,913	4%
	T-Mobile	477	113	0	0	113	24%
Incumbent Wireline	CenturyLink	12,720	2,142	0	0	2,142	17%
	AT&T	11,788	4,495	1	0	4,496	38%
	Frontier Florida	4,013	0	0	1,106	1,106	28%
	Windstream	2,282	874	0	0	874	38%
	FairPoint	565	203	3	0	206	36%
	NEFCOM	392	157	0	0	157	40%
	TDS Telecom	168	59	0	0	59	35%
	ITS Telecom	93	20	0	0	20	22%
	Frontier of the South	30	0	0	7	7	23%
	Smart City	9	0	0	0	0	0%
Competitive Wireline	Cox Telecom	626	0	0	291	291	46%
	TeleCircuit	444	52	52	0	104	23%
	Knology d/b/a WOW	91	0	0	33	33	36%
	Global Connection	3	0	0	0	0	0%
	<b>Total</b>	<b>841,926</b>	<b>24,115</b>	<b>1,065</b>	<b>27,879</b>	<b>53,059</b>	<b>6%</b>

Source: Form 555 submitted to FCC and Universal Service Administrative Company by ETCs, Due by January 31, 2017.

**Attachment D**  
**Agencies, Organizations, and Business Lifeline Partners**

<b>Florida Lifeline Partners</b>	
AARP - Florida Chapter	Ability Housing of Northeast Florida
ACCESS Florida Community Network Partners	Agency for Health Care Administration
Agency for Persons with Disabilities	Aging Matters in Brevard County
Aging With Dignity	Florida Senior Medicare Patrol
Alliance for Aging, Inc.	Florida Senior Program
America's Second Harvest of the Big Bend, Inc.	Florida Telecommunications Relay, Inc.
Area Agencies on Aging	Florida Voters League
Big Bend 2-1-1 and other 2-1-1 Agencies	1000 Friends of Florida, Inc.
Boley Centers, Inc.	Habitat for Humanity – Florida
Braille and Talking Book Library	HANDS of Central Florida
Brain Injury Association of Florida, Inc.	Hemophilia Foundation of Greater Florida
Broward County Elderly and Veterans Services Division	Hispanic Office for Local Assistance
Bureau of Indian Affairs Programs	HOPE Connection
Capital Area Community Action Agency, Inc.	Leon County School Board
Catholic Charities of Central Florida	Little Havana Activities and Nutrition Centers of Dade County, Inc.
Centers for Drug Free Living	Living Stones Native Circle
Centers for Independent Living	Marion Senior Services
Central Florida Community Action Agency	Mid-Florida Housing Partnership, Inc.
City and County Consumer Assistance Departments	Miccosukee Tribe of Indians of Florida
City and County Housing Authorities	Monroe County Social Services
Communities In Schools Foster Grandparent Program	Feeding South Florida
Community Partnership Group	NAACP (Florida Associations)
Disability Rights Florida	One-Stop Career Centers (DEO)
Faith Radio Station and other Florida radio stations	Seminole County Government Community Development
Federal Social Security Administration - Tallahassee District	Seniors First
First Quality Home Care	Senior Resource Alliance
Florida Alliance for Information and Referral Services	South East American Council, Inc.

<b>Florida Lifeline Partners (continued)</b>	
Florida Assisted Living Association	Refuge House of the Big Bend
Florida Association for Community action	Tallahassee Memorial Hospital and other Florida hospitals
Florida Association of Community Health Centers	Tallahassee Urban League
Florida Association of Counties	Tampa Vet Center
Florida Association of County Human Service Administrators	Three Rivers Legal Services, Inc.
Florida Association of Food Banks	United Home Care Services
Florida Association of Housing and Redevelopment Officials	United Way of Florida
Florida Coalition for Children	Urban Leagues of Florida
Florida Coalition for the Homeless	U.S. Department of Housing and Urban Development
Florida Council on Aging	Washington County Council on Aging
Florida Deaf Services Centers Association	Wakulla County Senior Citizens Council
Florida Department of Children and Families	Nursing Homes Administrators
Florida Department of Community Affairs	Florida Department of Education
Florida Department of Economic Opportunity	Florida Department of Revenue
Florida Department of Elder Affairs	Florida Developmental Disabilities Council
Florida Department of Veterans' Affairs	Florida Home Partnership
Florida Elder Care Services	Florida Housing Coalition
Florida Hospital Association	Florida League of Cities, Inc.
Florida Housing Finance Corporation	Florida Nurses Association
Florida Low Income Housing Associates	Florida Public Libraries
Florida Office of Public Counsel	Florida Rural Legal Services, Inc.
Florida Public School Districts	HOPE Community Center
ASPIRE Health Partners	National Church Residences
Goodwill Industries of Central Florida	Good News Outreach
Florida Department of Education	Aging True Community Senior Services
Elder Options	