

### **Audit Committee**

### **Briefing Book**

Thursday, April 20, 2023

10:00 a.m. - 11:30 a.m. Eastern Time

### Available for Public Use

**USAC Offices** 

700 12th Street NW, Suite 900

Washington, DC, 20005

### Universal Service Administrative Company Audit Committee Quarterly Meeting Agenda

Thursday, April 20, 2023 10:00 a.m. –11:30 a.m. Eastern Time USAC Offices 700 12th Street, N.W., Suite 900 Washington, D.C. 20005

OPEN SESSION		
Chair	<ul> <li>a1. Consent Items (each item is available for discussion upon request):</li> <li>A. Approval of Audit Committee Meeting Minutes of January 30, 2023</li> <li>B. Approval of moving all <i>Executive Session</i> items into <i>Executive Session</i></li> <li>C. Review of USAC's Processes to Assess Compliance with Applicable Laws and Regulations</li> </ul>	5
Teleshia	<ul> <li>i1. Audit and Assurance Business Update</li> <li>1Q2023 Accomplishments</li> <li>Plans for 2Q2023</li> <li>Audit Aging Analysis</li> <li>Roadmap</li> </ul>	30

	EXECUTIVE SESSION  Confidential – Executive Session Recommended	Estimated Duration in Minutes
Teleshia	<ul> <li>i2. Audit and Assurance Division Business Update (Continued)</li> <li>Three-Year Analysis of Audit Recoveries</li> <li>High Cost Modernized Audit Update</li> <li>Customer Service Audit</li> </ul>	30
Teleshia	<b>a2.</b> Action on One USAC Audit and Assurance Division Strategic Audit Report	10
Chair	i3. Audit Committee Executive Session with USAC's Vice President of Audit and Assurance	15

**Next Scheduled USAC Audit Committee Meeting** 

Monday, July 24, 2023 USAC Offices, Washington, D.C.

### **Universal Service Administrative Company Audit Committee Meeting**

#### **ACTION ITEM**

#### **Consent Items**

#### **Action Requested**

The Audit Committee (Committee) of the USAC Board of Directors (Board) is requested to approve the consent items listed below.

#### **Discussion**

The Committee is requested to approve the following items using the consent resolution below:

- A. Committee meeting minutes of January 30, 2023 (see Attachment A-1).
- **B.** Approval of moving all *Executive Session* items into *Executive Session*:
  - (1) i2 Audit and Assurance Division Business Update (Continued). USAC management recommends that this matter be discussed in Executive Session because it relates to specific internal controls or confidential company data that would constitute a discussion of internal rules and procedures, and may also include discussion of investigatory records or pending or contemplated enforcement action against participants in the universal service support mechanisms.
  - (2) **a2** Action on One USAC Audit and Assurance Division Strategic Audit Report. USAC management recommends that this matter be discussed in *Executive Session* because it relates to *specific internal controls or confidential company data* that would constitute a discussion of internal rules and procedures.
  - (3) **i3** Audit Committee *Executive Session* with USAC's Vice President of Audit and Assurance. USAC management recommends that this matter be discussed in *Executive Session* pursuant to the guidelines in the approved Audit Committee Charter.
- **C.** Review of USAC's Processes to Assess Compliance with Applicable Laws and Regulations (see **Attachment C**).

In accordance with Section III.G of the Committee's Charter, the Committee, in consultation with USAC's General Counsel and Vice President of Audit and Assurance, is required to review the processes established to assure compliance by USAC with all applicable laws. Attachment C documents the assessment and

briefly discusses the controls in place to assure compliance. Compliance processes for administration of the Universal Service Fund and the Universal Service Support Mechanisms by each programmatic division and USAC's financial operations are based on Section 254 of the Communications Act of 1934, as amended, Part 54 of the Commission's rules, Commission orders, and FCC staff directives. Additionally, through the combined efforts of USAC's Office of General Counsel, Audit and Assurance Division, and Human Resources division, ongoing compliance with laws and regulations is monitored and assessed.

Upon request of a Committee member, any one or more of the above items are available for discussion by the Committee.

#### **Recommended USAC Audit Committee Action**

APPROVAL OF THE FOLLOWING RESOLUTION:

**RESOLVED**, that the Audit Committee of the USAC Board of Directors hereby approves: (1) the Committee meeting minutes of January 30, 2023; (2) discussion in *Executive Session* of the items noted above; and (3) USAC's Processes to Assess Compliance with Applicable Laws and Regulations.

# UNIVERSAL SERVICE ADMINISTRATIVE COMPANY 700 12th Street, N.W., Suite 900 Washington, D.C. 20005

#### AUDIT COMMITTEE MEETING Monday, January 30, 2023

#### (DRAFT) MINUTES<sup>1</sup>

The quarterly meeting of the Audit Committee (Committee) of the USAC Board of Directors (Board) was held at USAC's offices in Washington, D.C. on Monday, January 30, 2023. Mr. Geoff Feiss, Committee Chair, called the meeting to order at 10:00 a.m. Eastern Time, with a quorum of with a quorum of four of five the Committee members present (there is one vacancy):

Feiss, Geoff – Chair Gillan, Joe Fontana, Brent – *by telephone* Schell, Julie Tritt

Other Board members and officers of the corporation present:

Butler, Stephen – Vice President of Shared Services

Buzacott, Alan - Member of the Board

Beverhelm, Chris – Vice President and Chief Administrative Officer – by telephone

Davis, Craig – Vice President of Schools and Libraries – by telephone

Delmar, Teleshia - Vice President of Audit and Assurance

Gaither, Victor – Vice President of High Cost – by telephone

Garber, Michelle – Vice President of Finance and Chief Financial Officer – by telephone

Gregory, Amber – Member of the Board

Hutchinson, Kyle – Vice President of IT and Chief Information Officer – by telephone

Mason, Ken – Member of the Board

Polk, Stephanie – Member of the Board – by telephone

Sekar, Radha – Chief Executive Officer

Skrivan, Michael – Member of the Board

Sweeney, Mark – Vice President of Rural Health Care – by telephone

Waller, Jeff – Member of the Board – by telephone

Wade, Dr. Joan – Member of the Board

Wein, Olivia - Member of the Board

Wibberly, Dr. Kathy – Member of the Board – *by telephone* 

Williams, Erin – Vice President, General Counsel, and Assistant Secretary

<sup>&</sup>lt;sup>1</sup> Draft resolutions were presented to the Committee prior to the Committee meeting. Where appropriate, non-substantive changes have been made to the resolutions set forth herein to clarify language, where necessary, or to correct grammatical or spelling errors.

#### Others present:

<u>NAME</u>	<u>COMPANY</u>
Benham, Cathy – by telephone	CSM
Case, Kevin – by telephone	USAC
Claxton, Naomi – by telephone	USAC
Edmonds, Daisy	USAC
Glisson, Connor – by telephone	USAC
Goode, Vernell	USAC
Havivi, Daniel – by telephone	USAC
Kriete, Debra – by telephone	South Dakota Department of Education
Morning, Kimberly – by telephone	Morgan Lewis
Parsons, Laura – by telephone	Maximus
Phillippi, Megan	USAC
Rones, Julie – by telephone	USAC
Sadirkhanova, Sabina – by telephone	USAC
Sauls, Lucas – by telephone	Maximus
Schrader, Theresa – by telephone	Broadband Legal Strategies, LLC
Schultz, Kent – by telephone	Deloitte
Spade, Gina – by telephone	Broadband Legal Strategies, LLC
Sutherland, Beverly – by telephone	EdTechnologyFunds, Inc.
Tiwari, Tanya – by telephone	Morgan Lewis
Wilson, Carl	USAC

#### **OPEN SESSION**

All materials from *Open Session* can be found on the <u>USAC website</u>.

- **a1.** Consent Items. Mr. Feiss presented this item to the Committee.
  - **A.** Approval of Committee meeting minutes of October 24, 2022.
  - **B.** Approval of moving all *Executive Session* items into *Executive Session*:
    - (1) i2 Audit and Assurance Division Business Update (Continued). USAC management recommended that this matter be discussed in Executive Session because it relates to specific internal controls or confidential company data that would constitute a discussion of internal rules and procedures, and may also include discussion of investigatory records or pending or contemplated enforcement action against participants in the universal service support mechanisms.
    - (2) **a4** Review of the 2023 Strategic Audit Plan. USAC management recommended that this matter be discussed in *Executive Session* because it relates to *specific internal controls*, *or confidential company data* that would constitute a discussion of internal rules and procedures.

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(3) **i3** – Audit Committee *Executive Session* with USAC's Vice President of Audit and Assurance. USAC management recommended that this matter be discussed in *Executive Session* pursuant to the guidelines in the approved Audit Committee Charter.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolutions:

**RESOLVED**, that the Audit Committee of the USAC Board of Directors hereby approves: (1) the Committee meeting minutes of October 24, 2022; and (2) discussion in *Executive Session* of the items noted above.

**a2.** Recommendation for Election of Committee Chair and Vice Chair. Mr. Feiss introduced Dr. Wade. As the Chair of the Nominating Committee, Dr. Wade reported on the election recommendations for the Audit Committee.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolution:

**RESOLVED**, that the USAC Audit Committee recommends that the USAC Board of Directors elect **Geoff Feiss** as Chair and **Stephanie Polk** as Vice Chair of the Committee. The term for each position begins immediately upon the election to such position by the Board and ends at such time as the Chair or Vice Chair (as the case may be): (i) is replaced by a successor selected by the Board, (ii) resigns from the Committee or the Board, (iii) is removed by resolution of the Board, or (iv) is no longer a member of the Board (whichever comes first).

**a3. Review of the 2023 Audit Committee Charter.** Ms. Delmar presented a report to the Committee suggesting minor revisions to the Charter.

On a motion duly made and seconded, and after discussion, the Committee adopted the following resolution:

**RESOLVED**, that the USAC Audit Committee, having reviewed the revised Audit Committee Charter presented by the USAC Audit and Assurance Division, recommends that the USAC Board of Directors approve the revised Audit Committee Charter.

- i1. Audit and Assurance Business Update. Ms. Delmar presented PowerPoint slides to the Committee for discussion covering the following topics:
  - 2022 Year in Review
  - Plans for 1Q2022
  - Audit Aging Analysis
  - Fiscal Year 2022 Operational Scorecard

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Roadmap

At 10:42 a.m. Eastern Time, on a motion duly made and seconded, the Committee moved into *Executive Session* for the purpose of discussing confidential items. Only members of the Board and USAC staff were present.

#### **EXECUTIVE SESSION**

- **i2.** Audit and Assurance Business Update (*Continued*). Ms. Delmar presented PowerPoint slides to the Committee for discussion covering the following topic:
  - Post Audit/Assessment Survey Results
- **a4. Review of the 2023 Strategic Audit Plan.** Ms. Delmar presented a report to the Committee on the proposed 2023 Strategic Audit Plan including the audit area, audit objectives, and a high-level summary of each audit to be conducted

On a motion duly made and seconded and after discussion, the Committee adopted the following resolution:

**RESOLVED,** that the USAC Audit Committee approves the 2023 Strategic Audit Plan.

At 11:48 a.m. Eastern Time, the Committee continued in Executive Session with only members of the Board and Ms. Delmar present.

**i3.** Audit Committee Executive Session with USAC's Vice President of Audit and Assurance. Per the guidelines in the approved Audit Committee Charter, Ms. Delmar met with members of Audit Committee and Board of Directors in a confidential Executive Session.

#### **OPEN SESSION**

At 12:07 p.m. Eastern Time, the Committee moved out of *Executive Session* and immediately reconvened in *Open Session*, at which time Mr. Feiss reported that, in *Executive Session*, the Committee took action on item a4 and discussed items i2 and i3.

On a motion duly made and seconded, the Committee adjourned at 12:08 p.m. Eastern Time.

/s/ Erin Williams
Assistant Secretary

#### ATTACHMENT C

### USAC'S PROCESSES TO ASSESS COMPLIANCE WITH APPLICABLE LAWS AND REGULATIONS

#### Overview

The Universal Service Administrative Company (USAC) is a private, not-for-profit corporation, organized under the laws of Delaware. In 1998, pursuant to federal regulation, the Federal Communications Commission (FCC or Commission) designated USAC as the permanent Administrator of the federal Universal Service Fund (USF) and the four federal Universal Service Support Mechanisms the USF supports, including the High Cost, Low Income (Lifeline), Schools and Libraries (E-Rate), and Rural Health Care programs. Pursuant to Section 254 of the Communications Act of 1934, as amended, and Part 54 of the Commission's rules, USAC administers the USF and the Universal Service Support Mechanisms, including performing the billing, collection, and disbursement (BC&D) functions. In addition, the FCC engaged USAC to administer the following Congressionally appropriated programs: Emergency Broadband Benefit Program (EBBP), the Affordable Connectivity Program (ACP), COVID-19 Telehealth, and the Emergency Connectivity Fund (ECF). The policies and procedures followed by USAC are documented and executed in accordance with FCC rules, Commission orders, FCC staff directives, and other applicable law.

Following is an overview of the methods employed by USAC to verify compliance with applicable laws and regulations. This document does not list every step or procedure or provide detailed information, as we do not want to compromise the integrity of our operating procedures or disclose proprietary information.

#### Universal Service Support Mechanisms and the Universal Service Fund

The processes established for management of the USF and each of the support mechanisms are designed to comply with Part 54 of the Commission's rules, and, in particular, 47 C.F.R. §§ 54.700-717. Section 54.717 provides that USAC shall obtain and pay for an annual audit conducted by an independent auditor to examine its operations and books of account to determine whether USAC is properly administering the Universal Service Support Mechanisms.<sup>4</sup> The annual audit encompasses: (i) an audit of the financial statements of USAC; and (ii) an agreed-upon procedures (AUP) review of operations for compliance with the FCC's rules, including a review of internal controls for accounting and administration. The AUP review covers the USF, the support

<sup>&</sup>lt;sup>1</sup> See 47 C.F.R. § 54.701(a); Changes to the Board of Directors of the National Exchange Carrier Association, Inc. et al., CC Docket Nos. 97-21 et al., Third Report and Order, Fourth Order on Reconsideration, and Eight Order on Reconsideration, 13 FCC Rcd 25058, 25069-70, para. 20 (1998). <sup>2</sup> 47 U.S.C. § 254.

<sup>&</sup>lt;sup>3</sup> See generally 47 C.F.R. pt. 54.

<sup>&</sup>lt;sup>4</sup> See 47 C.F.R. § 54.717.

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mechanisms and related BC&D functions, other administrative areas of USAC, corporate governance, anti-fraud measures, audit follow-up, and disbursements. Further, a section of the AUP verifies compliance with USAC policies and procedures and FCC rules and directives.

FCC rules provide that in choosing an auditing firm to conduct the annual audit, USAC shall not "engage an independent auditor that has been involved in designing the accounting or reporting systems under review in the audit." The independent audit provides an outside review as to whether the procedures used by USAC in administering the USF, the support mechanisms, and related BC&D functions comply with FCC rules. This is a major component of USAC's program to determine compliance with FCC rules. The AUP document is revised annually by USAC and FCC staff to include testing compliance with new applicable rules and directives implemented over the past year.

The FCC-mandated financial audits of USAC conducted in 2020 have resulted in "clean" financial audit opinions, and the AUP review did not result in findings that USAC failed to comply with applicable FCC directives. The financial statement audit and AUP for 2022 is in progress.

USAC staff for each of these areas is knowledgeable in applicable FCC rules, and staff review the rules to verify operating processes are compliant. In addition, the management of each area regularly communicates with FCC staff to seek guidance and discuss implementation issues to determine whether USAC is implementing the rules as intended by the Commission.

#### Universal Service Administrative Company

#### A. Office of the General Counsel

USAC's Office of the General Counsel (OGC) advises the company concerning compliance with applicable laws and regulations. OGC regularly consults with USAC management concerning compliance with local, state, and federal laws applicable to USAC's operations. The USAC General Counsel is a member of the company's senior leadership group. USAC attorneys assist USAC's programmatic and administrative groups (including USAC's Audit and Assurance Division (AAD)), when requested, on matters dealing with FCC rules and directives as well as on issues not addressed in the rules or directives. Upon the release of a new order or directive affecting a USF program, OGC coordinates with the impacted program as part of the intake process in order to ensure that implementation is in accordance with all applicable rules and requirements. OGC utilizes outside counsel and other information resources as needed. USAC attorneys also attend continuing education and other professional development programs throughout the year.

<sup>&</sup>lt;sup>5</sup> 47 C.F.R. § 54.717(c).

#### B. <u>Memorandum of Understanding</u>

The FCC and USAC originally entered into a Memorandum of Understanding (MOU) to govern USAC's administration of the USF and the Universal Service Support Mechanisms on September 9, 2008, as amended on November 4, 2014. The FCC and USAC subsequently entered into a revised USF MOU on May 2, 2016, and a further revised USF MOU on December 19, 2018. On November 22, 2021, the FCC and USAC signed an amendment to the revised USF MOU.

Additionally, the FCC and USAC signed MOUs to govern USAC's administration of each of the Congressionally appropriated programs: EBBP (February 3, 2021), ACP (November 16, 2021; revised and restated on March 2, 2022), COVID-19 Telehealth (February 4, 2021), and ECF (March 19, 2021).

Each MOU is a streamlined framework memorializing the FCC's and USAC's partnership to achieve success in all USAC-administered programs. Each MOU recognizes USAC as responsible for the efficient, effective, and competitively neutral management of all such programs, including:

- Collecting contributions for the USF programs and administering the disbursement of program support for all USAC-administered programs;
- Producing timely and relevant data and analysis to inform the Commission's policymaking and oversight of the USF and the Congressionally appropriated programs; and
- Educating stakeholders to promote successful participation in the USF and Congressionally appropriated programs.

#### C. Human Resources

USAC's Chief Human Resources Officer is responsible for administering USAC's Human Resources (HR) policies and procedures in accordance with applicable employment laws and practices. To accomplish this task, HR is a member of various professional associations that monitor and provide nationwide employment law references and best practices. USAC's OGC has access to expertise in labor and employment law matters and has arranged with outside counsel for assistance when needed. To promote compliance with applicable employment laws and regulations, and to prevent, detect and correct inappropriate behaviors and build a productive, inclusive culture, all managers are required to attend Civil Treatment trainings and learning courses. In addition, all USAC employees are required to attend an annual ethics training provided by HR and OGC.

#### D. Audit & Assurance Division

AAD conducts objective and independent audits of beneficiaries of and contributors to the federal universal service fund. AAD also performs payment quality assessments in accordance with the Payment Integrity Information Act of 2019, as well as operational audits of USAC's key functions. AAD also conducts audits of USF recipients to determine compliance with supply chain requirements.

The audits and assessments test compliance with FCC rules, directives and other applicable law. AAD works closely with USAC's OGC, the FCC Office of Managing Director (OMD) and the FCC Wireline Competition Bureau (WCB). AAD also conducts audits of USAC's programs and divisions to determine the effectiveness and efficiency of non-financial operational processes, internal policies and procedures, and compliance with applicable laws.

#### E. Finance

The Internal Controls team within Finance tests the design and operating effectiveness of transaction-level controls on a three-year cycle (all key internal controls are tested at least once every three years). The Internal Controls team is responsible for assessing the adequacy of controls, documenting risk and control matrices, identifying needed improvements, obtaining corresponding corrective actions, and reporting annually on internal controls. These responsibilities are in alignment with the requirement contained in each FCC/USAC MOU for USAC to implement an internal control structure consistent with the standards and guidance contained in OMB Circular A-123.

#### F. Office of the Chief Administrative Officer

The Enterprise Process Improvement team (EPI) within the Office of the Chief Administrative Officer (OCAO) supports USAC's four USF programs and supporting divisions in responding to audits conducted of USF beneficiaries and contributors, testing compliance with FCC rules and directives. EPI also performs assessments, evaluations and operational audits of USAC's key functions and controls. EPI assists the impacted program or division with developing and reporting corrective action plans (CAPs), ensuring completeness on addressing audit findings, and establishing a reasonable timeframe for implementation. EPI is also responsible for managing USAC's internal policies and procedures, ensuring documentation is in accordance with applicable laws, regulations and standards. Finally, EPI assists programs and divisions in creating and updating policies and procedures to clearly define USAC's standards, guidelines, and objectives.

#### Summary

USAC policies and procedures for administering the USF and the support mechanisms, as well as the Congressionally appropriated programs, are designed to comply with applicable Commission rules and orders and FCC staff directives. Since 1998, USAC has consistently received "clean" financial audit opinions. In addition, through the efforts of USAC's OGC, AAD, and HR divisions, ongoing compliance with applicable laws and rules is monitored and assessed.



### **Audit Committee**

Audit and Assurance Business Update

Open Session

April 20, 2023

# **Agenda**

- 1Q2023 Accomplishments
- Plans for 2Q2023
- Audit Aging Analysis
- Roadmap

# **1Q2023 Accomplishments**

- Beneficiary and Contributor Audit Program (BCAP)
  - Announced 42 audits (2 CR, 12 HC, 6 LI, 15 E-Rate, 7 RHC).
  - Released 15 audits (1 CR, 9 HC, 3 LI, 1 E-Rate, 1 RHC).
  - Awarded 4 contracts for audit services.
  - Continued site visits for CAF II Model audits and began site visits for RBE audits.
    - Internal staff joined engineering firms on selected site visits.
- Payment Quality Assurance (PQA)
  - Completed testing for 74 High Cost assessments.

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# 1Q2023 Accomplishments (Continued)

- Supply Chain Audit Program (SCAP)
  - Completed and released the first three audits, which will be presented at the Board of Directors meeting.
  - Announced 10 new audits.
- Strategic Audit (SA)
  - Completed Lifeline Eligibility audit which will be presented in Executive Session.

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### Plans for 2Q2023

- BCAP
  - Announce 30 audits and complete 20 audits.
  - Participate in Western Telecommunications Alliance (WTA) Advocates for Rural Broadband Conference to discuss audit process and common findings.
- PQA
  - Finalize improper payment results for FY2022 High Cost program.
  - Continue testing FY2023 E-Rate and Lifeline assessments.
- Continue ACP Integrity Assurance (PIA) testing.

# Plans for 2Q2023 (Continued)

- SA
  - Complete support activities for AUP testing.
  - Commence Assurance of Expense Payments audit.

### **BCAP Audits in Process**

The status of BCAP audits in process as of April 1, 2023:

Program	Announced	Fieldwork	Reporting	Total
Contributor Revenue	1	9	5	15
High Cost	4	45	27	76
Lifeline	0	23	8	31
E-Rate	1	13	56	70
Rural Health Care	0	19	15	34
Total	6	109	111	226

### **BCAP Audits Aging Report**

The aging report of BCAP audits in process as of April 1, 2023

Program	< 6 months	> 6 months	> 12 months	> 18 months	Total	Change from 01/01/2023
Contributor Revenue	1	5	6	2	14	(3)
High Cost	27	21	15	6	69	6
Lifeline	0	15	0	14	29	(9)
E-Rate	16	34	0	30	80	11
Rural Health Care	5	14	0	15	34	(3)
Total #	49	89	21	67	226	2
Total %	21.7%	39.4%	9.3%	29.6%	100%	N/A
Reporting Phase	0	45	14	57	116	32

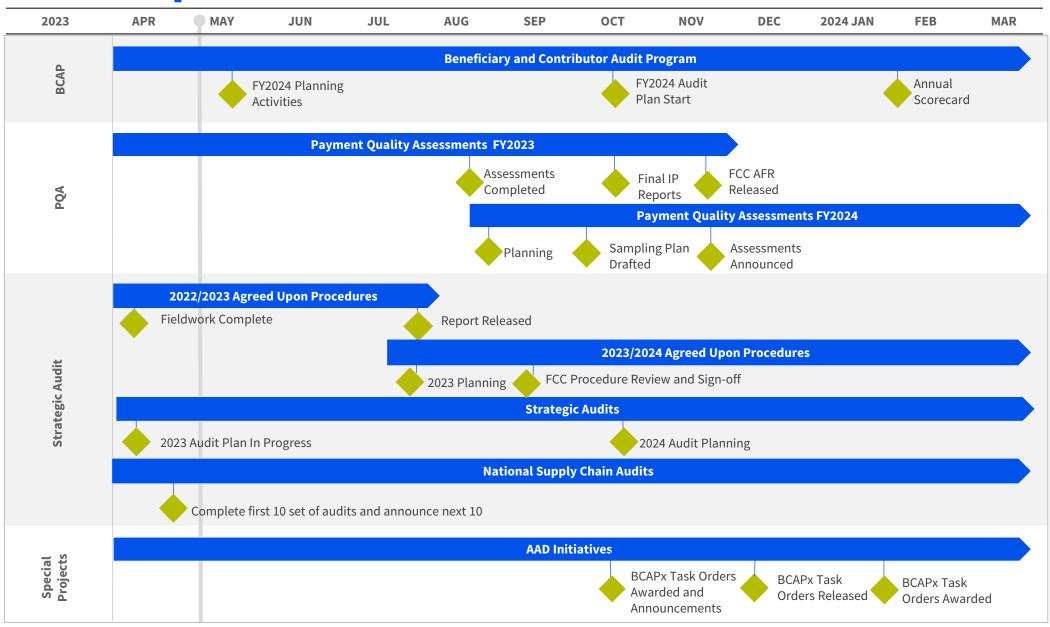
<sup>\*</sup>Note: For the 57 audits >18 months, 21 are with the FCC and 14 are with USAC for review.

### **PQA Assessments in Process**

The status of PQA assessments in process as of April 1, 2023

Program	Announced	Fieldwork	Reporting	Total
High Cost	0	0	74	74
Lifeline	231	231	0	231
E-Rate	350	350	0	350
Total	581	581	74	655

# Roadmap





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# **Appendix A: Glossary of Terms**

Term	Definition
AAD	Audit and Assurance Division: An organization within USAC dedicated to preserving the integrity of universal service funds and USAC's corporate resources by conducting objective audits, performing payment quality assessments, and evaluating the efficiency and effectiveness of USAC's operations.
ACP	Affordable Connectivity Program: A \$14 billion federal program created through the Infrastructure Investment and Jobs Act to help low-income households pay for internet service and connected internet devices.
AUP	Agreed Upon Procedures: Annual review of USAC's operations conducted by an external audit firm.
BCAP	Beneficiary and Contributor Audit Program: BCAP assesses beneficiary and contributor compliance with the Federal Communications Commission (FCC) rules, orders, and program requirements (collectively, FCC Rules).
BCAPx	Beneficiary and Contributor Audit Program External Audits: BCAP audits performed by outsourced (outside) audit firms.
CR	Contributor Revenue: Audits of Contributor Revenue filers.

1.

# **Appendix A: Glossary of Terms (Continued)**

Term	Definition		
E-Rate	Audits of E-Rate program participants.		
НС	High Cost: Audits of High Cost program participants.		
IP	Improper Payment.		
LI	Lifeline: Audits of Lifeline program participants.		
PQA	Payment Quality Assurance: PQA assesses the accuracy of Universal Service Fund disbursements and determines whether improper payments exist and assists the FCC in meeting its reporting obligations subject to the Payment Integrity Information Act.		
RHC	Rural Health Care: Audits of Rural Health Care program participants.		
SA	Strategic Audits: Strategic Audits assess USAC's compliance with FCC Rules, policies and procedures, and the effectiveness and efficiency of internal operations.		
SCAP	Supply Chain Audit Program: SCAP assesses program participant compliance with the Federal Communications Commission (FCC) rules, orders, and program requirements (FCC Rules) related to protecting the communications supply chain.		
USF	Universal Service Fund: The four universal service programs.		



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