



National Lifeline  
Association

# Not Acceptable Practice (NAP) Process

The NaLA Not Acceptable Practice (NAP) Program was created as an industry self-governance measure to promote the integrity of the Lifeline program by administering Lifeline best practices and identifying agents who engage in improper Lifeline sales practices or behaviors. The program allows ETCs to submit an agent's not acceptable practice for review, with supporting documents, via the NaLA Query Tool. NaLA allows each ETC to designate two company representatives as admins for the tool.

## HOW IT WORKS

**1. The ETC Admin logs in to <https://acp.nalalifeline.org> and clicks on the link to the Not Acceptable Practice Submission section of the tool.**

**2. The Admin will complete an online form, which includes information fields, such as:**

- Agent Name, Phone number, Company, Email
- Description of alleged action/behavior
- Up to 5 supporting Documents
- Agent Certification ID (optional)
- Distributing State(s)
- Classification Status (1099 or W2)\*

\*Please note that NaLA does not allow employers to submit W-2 agents through the NAP process at this time. ETCs should follow their internal hiring, performance and termination processes when dealing with employees, and that includes employees involved in alleged Lifeline program rules violations.

**3. Upon submission, a rotating committee of NaLA members will review each case and determine if the agent in question has committed a Not Acceptable Practice as defined by the FCC, USAC, state PUC or NaLA.**

- If the case applies to any of the ETCs represented on the committee, that member will abstain from voting.
- Committee members will review each case individually then meet as a group to vote. The majority vote will determine the result of the case.
- Committee members will rotate every 6 months.
- ETCs can expect a response from the committee within 7-10 business days of submission. This may vary slightly in the event of a large volume of cases.
- All cases will be stored and tracked by NaLA and will be analyzed to find trends.

**4. Once a decision has been made, the NaLA ACP committee will notify the ETC and the NaLA training administrator of the result. If the committee finds that a NAP has been committed, a flag will be placed on that agent's NaLA profile.**

- The flag will be searchable by any ETC by the agent's NaLA Certification ID only in the Query Tool.
- The ETC that submits the case can track it by pulling an agent report in the Reporting section of the tool, which provides only company-specific agent information.
- The Not Acceptable Practice Flag indicates to any ETC that the agent has engaged in improper behavior in the Lifeline program. The ETC can then make an informed, independent decision about whether to onboard, or continue working with, an agent.