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PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division
Consumer Programs Branch

RESOLUTION T-17394
June 27, 2013

R E S O L U T I O N

Resolution T-17394. Help Central Inc. Request for certification as the 2-1-1 service provider for Butte County. By Letter to Executive Director filed on March 22, 2013.

Summary

This resolution grants Help Central Inc., hereinafter referred to as Help Central, the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Butte County. Butte 2-1-1 will provide immediate public safety impact during non-emergencies, emergencies and disasters such as providing a web-based and call-in information call center addressing public safety 24 hours/day, 7 days/week and will work closely with the Office of Emergency Services to assure that the partnership of 9-1-1 and 2-1-1 is effective. This authority is granted for an indefinite term, and is subject to review upon a letter to the California Public Utilities Commission (CPUC) showing sufficient grounds to revise or rescind the term.

Background

2-1-1 is the national abbreviated dialing code designated by the Federal Communications Commission to be used to phone non-emergency community I&R providers. Upon dialing 2-1-1, a caller will be routed to a referral service and then to an agency that can provide information concerning social services such as housing assistance, programs to assist with utility bills, food assistance and other less urgent situations not currently addressed by either 9-1-1 or 3-1-1 services.

On January 23, 2002, the CPUC instituted Rulemaking (R.) 02-01-025 into the implementation of 2-1-1 dialing in the State of California. In Decision (D.) 03-02-029, the Commission adopted regulatory policies and procedures to implement 2-1-1 dialing.

Included among these policies were guidelines and procedures whereby the Commission can certify I&R providers as eligible to purchase network telephone service that will enable them to receive calls from those who dial 2-1-1. Most of the procedures for I&R providers to follow in requesting authority to use the 2-1-1 dialing code are contained in D.03-02-029 Ordering Paragraph 2, quoted below:

2. Information and Referral (I&R) providers seeking authority to provide 2-1-1 service or to establish Regional Technical Centers for routing 2-1-1 calls to I&R service providers in California shall submit a letter to the Executive Director of the Commission approximately nine months before they plan to commence service. The letter shall contain the information detailed in the Service Provider Application Package in Appendix A, shall include a service rollout plan, and shall demonstrate compliance with the guidelines contained in Appendix A to this decision, along with letters of endorsement from community groups as described in Appendix A. The I&R providers shall serve this application letter on the parties to this proceeding on the same day as its submission to the Commission. The Commission shall publish a notice of this letter in its Daily Calendar. We establish a milestone of six months from the initial filing of this application letter for action by the Commission via a resolution resolving any issues. This application letter should be served on the appropriate incumbent local exchange carriers and on all parties to this proceeding.

Help Central filed a complete copy of its application letter¹ requesting certification as the 2-1-1 service provider in Butte County that was received by the Commission's Executive Director on March 22, 2013. On March 21, 2013,

¹ The terms "application letter", "letter" and "application" used herein mean the package of materials the prospective I&R provider files with the Commission by letter to the Executive Director, as specified in D.03-02-029, and are not a formal application to the Commission as described in the Commission's Rules of Practice and Procedure.

Help Central sent to the service list for R.02-01-025 copies of its application letter. Subsequent to the filing, Help Central filed a supplemental letter received by the Commission's Executive Director on May 16, 2013, to include Public Safety matters. On May 16, 2013, Help Central sent copies of the supplemental letter to the service list for R.02-01-025.

We remind local exchange carriers of D. 03-02-029, Ordering Paragraph 3, which states "Within four months of the filing of a letter by I&R providers or a regional technical center seeking to initiate 2-1-1 service, the incumbent local exchange carriers serving the territory over which the 2-1-1 service will be offered shall file advice letters to provide the 2-1-1 switch translation services required. Ordering Paragraph 4 states "All other incumbent local carriers serving a territory over which the 2-1-1 service will be offered shall provide the needed switch translation service, but may either concur in the price terms offered by Pacific or Verizon or submit their own cost support information. This filing shall follow that of Pacific or Verizon by no more than 30 days." Competitive local carriers must comply with Ordering Paragraph 7, which states in part, "Within one month of the filing of an advice letter by incumbent local exchange carriers to offer 2-1-1 switch translation services in a specific area, each competitive local carrier providing services in the affected areas shall submit an advice letter, under General Order 96-A², demonstrating that it will offer 2-1-1 switch translation service at a reasonable rate to I&R providers on a timetable consistent with their rollout plans."

We remind payphone service providers of the same decision's Ordering Paragraph 6, stating in part, "The providers of payphone services in an area in which 2-1-1 service will be offered shall end all non-conforming uses of 2-1-1 service within six months of their filing." i.e., within six months of the filing of the application letter by the I&R provider.

Notice/Protests

Help Central states that it mailed a copy of its application letter to SBC Communications, now AT&T, as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers. The

² General Order 96-A has since been replaced by General Order 96-B.

Communications Division published notice of Help Central's application letter in the Commission Daily Calendar on April 29 through May 3, 2013. In response to Help Central application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated April 15, 2013, supporting the request of Help Central to use the 2-1-1 dialing code in Butte County. No other comments were submitted.

Discussion

Help Central has operated a public information program in Butte County for ten years to help residents find and access free and low cost community services. Community efforts to establish 2-1-1 services in Butte County span more than a decade. Planning for Butte 2-1-1 began initially in 2002 when a collaborative group of agencies, representing local government and non-profit organizations in Butte County, convened to find strategies to improve access to services for individuals in need. In 2003, the HelpCentral.org web site was launched as Phase 1 of a plan to provide a centralized comprehensive information and referral service in Butte County. HelpCentral.org has utilized a 2-1-1 database and web hosting software program to maintain a public community resource information database for ten years. During that time, Help Central developed partnerships with key stakeholders and funders to pursue building the Phase 2 expansion of the project - the establishment of a 2-1-1 telephone assistance program for Butte County. Also during that time, the Help Central director served for six years on the California Alliance of Information and Referral Services Board (CAIRS Board) and worked with the emerging 2-1-1 California collaborative and leadership to host regional information and "planning for 2-1-1" meetings in northern California. From 2011 to the present, Help Central convened and worked with a Butte 2-1-1 Steering Committee and has secured the necessary expansion funding to proceed with the planning, implementation, and sustainable operations of a 2-1-1 program in Butte County.

Help Central has a robust history providing in-service trainings to a broad array of agencies working with families, low income individuals, Latino, Hmong, and other at risk and underserved populations. In 2012, Help Central provided training to agencies helping veterans, homeless individuals, unemployed, formerly incarcerated individuals, low income students, families at risk of child

abuse, new Moms, CalFresh recipients, families with preschoolers, and people needing behavioral health services.

Fifteen agencies submitted letters in support of Help Central as the designated 2-1-1 Service provider in Butte County.

Help Central has the internal protocols to ensure calls are handled consistent with guidelines developed by the Alliance of Information and Referral Systems including call handling, database development and maintenance and disaster response and preparedness.

Help Central provided a three-year budget for the Butte County service as part of their application. Help Central budget and financial statements indicate a stable and solvent financial position. It appears that Help Central has appropriate budgetary planning procedures to support 2-1-1 service at current call volumes.

The second section of the prescribed application sets forth the required service conditions that a 2-1-1 service provider must meet. Section 2 of Help Central's application indicates that it does not and will not receive fees from referred organizations for referrals and no fees or charges levied to providers listed in its database.

Help Central is contracting with 2-1-1 Sacramento to provide I&R services in English and Spanish and contracts with Language Line multi-lingual translation service with access to more than 150 languages and dialects and has experience with I&R. TTY/TDY, phones for hearing impaired services are in place. All of these options will be available with the implementation of 2-1-1 in Butte County.

Safety Considerations

Butte 2-1-1 will provide services that promote and have an immediate positive impact on public safety during emergencies and disasters. In partnership with the Butte County Office of Emergency Management and incident command officials, Butte 2-1-1 will provide current, up-to-date, critical public information related to emergency/disaster incidents, including real-time status of the disaster, evacuations, road closures, shelters, affected areas, and recovery and relief

programs. Butte 2-1-1 will provide information linking people to the Safe and Well registry during and after disaster. The Butte 2-1-1 call center and the after hours service provider (2-1-1 Sacramento) are equipped to provide “warm” telephone transfers to enable residents to access necessary services immediately. All call specialists receive training in working with individuals during emergency/disasters and are sensitive to individual needs and able to engage callers to determine the best options for needed services. In addition, Butte 2-1-1 and 2-1-1 Sacramento have an emergency/disaster plan that will be implemented as needed to assure that call services are available 24 hours/day, 7 days/week.

Through existing and innovative technology and in coordination with disaster officials, the Butte 2-1-1 web site and social networking sites will complement the 2-1-1 telephone public information service by providing accessible online information, links, and audio/visual updates during and after an emergency/disaster.

In preparation for disaster events, the complete, accurate and annually updated Butte 2-1-1 pre-disaster database provides web-based information about on-going services. In addition, the database and web site information will be augmented in real time during emergencies/disasters to include all response services focused on the specific emerging disaster such as shelters, evacuation area and routes, temporary animal shelters, counseling services, medical aid, and contact information for local/state/ federal resources implemented in response to the emergency/disaster. During emergency/disasters the website will also provide alerts about how to take care of self/family by providing information supplied by emergency services, such as the type of mask to wear to prevent smoke inhalation, where to acquire sand bags, potable water, flash lights, and telephone numbers to reach emergency services that are immediately needed.

Butte 2-1-1 will also provide telephone and web-based services that promote and have positive public safety impact during non-emergency situations. The comprehensive, accurate and regularly updated database provides web-based and call center information about year round public safety services. The Butte 2-1-1 database includes contact information to access many local, state, and national hotlines including poison control, suicide, child abuse, adult abuse, teen bullying/cyberbullying and other crises, domestic violence, veterans issues,

immediate shelter, food, and health needs. The database also includes local public and personal safety prevention information and programs including child car seats and installation, bicycle helmets, fingerprint ID programs, personal safety education, smoke detector installation, safe medication, immunizations, disease outbreak information, disaster preparedness kits, drug and alcohol prevention and treatment, safe driving programs, bad weather advisories, road conditions alerts, updates on power outages, and more. All 2-1-1 call specialists receive training in working with individual callers to assess needs, and can respond in over 100 languages. The call specialists treat each call as a “warm” call and are sensitive to individual needs and able to engage callers to determine the best options for a variety of services. The call center is equipped to provide “warm” telephone transfers to enable residents to access necessary services immediately. Butte 2-1-1 call specialists can specifically refer callers to crisis lines, mental health and medical services, domestic violence services, suicide services, poison services, prevention programs, and many other local services identified above that help address public safety needs.

The Butte 2-1-1 web site will also continue to be a hub of non-emergency public safety information available to county residents through the online searchable 2-1-1 database and via specialized featured alerts on the home page. During non-emergency times, the Butte 2-1-1 web site will maintain public safety services information such as referrals for prevention programs, counseling services, parenting services, domestic violence services, gun safety, immunizations, burn permits, extreme weather shelters, violence prevention, and more. Individuals are able to search the Butte 2-1-1 website for appropriate services and to print out complete information about the service including address, telephone, access, transportation to and from, documents necessary for application for services and more. Instructions are provided on the website to assure that users are able to search effectively and that people who are not able to find services will be prompted to call the telephone number 2-1-1.

Butte 2-1-1 will work closely with the Butte County Sheriff’s Office and other local law enforcement agencies, along with the Office of Emergency Management, to ensure that the partnership of 9-1-1 and 2-1-1 is mutually effective in addressing public safety needs. 2-1-1 will transfer calls appropriately directed to 9-1-1 during an emergency situation, and 9-1-1 is prepared to refer

callers to 2-1-1 when the caller's situation is not an emergency. This partnership will more effectively utilize Butte 2-1-1 local resources at all times and they anticipate that it will relieve the 9-1-1 operators of unnecessary calls year round. Butte 2-1-1 will also have capacity to receive from and transfer calls to the Northern Valley Talkline (a peer support warm line for non-crisis behavioral health calls), to Catalyst Domestic Violence Services' crisis and warm lines, and to the Butte County Behavioral Health Crisis/Suicide line. Butte 2-1-1 will work closely with the County Public Health department to provide call center and web-based information on prevention of disease, alerts about disease outbreaks, and services to address seasonal health and worker health concerns. Butte 2-1-1 is establishing policies and procedures to help people make the best and most informed decisions they can to stay safe and thrive during times of disaster as well as in day to day non-emergency situations.

Implementation of 2-1-1 Information and Referral services will be a significant enhancement to the safety of residents of Butte County. 2-1-1 is the interface to suicide hotlines and facilitates access to other mental and social health preventative services for residents of the affected county. 2-1-1 services have evolved beyond being a single, easily remembered hotline number to being a source of vital safety information source during periods of emergency, such as up-to-the-minute fire and disaster relief information and connection with temporary housing and medical assistance.

During the 2007 Southern California firestorms, 2-1-1 service providers experienced an 800% increase from prior weeks' call levels. The CPUC in its firestorm report commended 2-1-1 service providers in the firestorm areas for providing information to county officials and the public. 2-1-1 also functioned as an interactive communications asset with personnel gathering information from the Joint Information Center, WebEOC, private sector corporations and other resources and providing that information to callers. Along with reverse 911, AlertSan Diego, 2-1-1 San Diego allowed the county to quickly notify affected residents of the need to evacuate and other emergency information. 2-1-1 services in emergency periods are complimentary to first responder and other emergency services. 2-1-1 activities generally consists of acquiring or verifying information essential to affected residents and the public. Information developed during emergencies include, but are not limited to

- Shelters (human and animal)
- Feeding and food distribution
- Evacuations
- Road closures/transportation issues
- Utility outages and reconnections
- Health alerts and warnings
- School closures and reopenings
- Facilitating family member contacts
- Assistance
- Mitigation and repairs such as sand bags, tarps, available volunteers to assist in repairs
- Governmental Assistance
- Emergency Alerts such as curfews, riot/looting
- Confirmed and suspected rumors

Help Central will be positioned to provide a similar functionality to Butte County when 2-1-1 is activated.

In the third section of the prescribed application, the applicant must demonstrate its understanding of and must agree to adhere to the standards for delivery of I&R services as established by the Alliance of Information and Referral Services (AIRS). Help Central's I&R program has internal protocols to ensure calls are handled consistent with guidelines developed by AIRS. AIRS' guidelines are the basis for the service delivery standards associated with use of the 2-1-1 dialing code as specified by the CPUC Decision 03-02-029. Help Central's application included descriptions of its policies in the areas of call assessment and follow-up, confidentiality, database standards, disaster readiness, reports and measures, cooperative relationships, training, marketing, and program evaluation. These policies appear to meet the standards established by AIRS.

In the fourth section of the prescribed application, the applicant demonstrates its level of community support by including letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its community. Help Central included in its application letters of endorsement from fifteen different organizations and agencies in a

broad range of health and human service fields throughout Butte County. These endorsements demonstrate broad community support.

In processing Help Central's 2-1-1 application, the Communications Division considered the input of the Butte County government because it oversees the operations of county hospitals, a county welfare department, and numerous other agencies and programs in the fields of health and human services, and is best equipped to evaluate whether an I&R provider is well suited to provide comprehensive I&R service in Butte County. California's size and diversity, in geography, politics, and many other categories, argue against a statewide "one size fits-all" approach to evaluating and choosing comprehensive I&R providers. County governments can best apply local standards and local knowledge to this difficult but important task. On February 19, 2013, Bill Connelly, Chairman of the Butte County Board of Supervisors, sent a letter endorsing Help Central's application to serve as the 2-1-1 provider of Butte County residents and employees. The Commission values the input of the Butte County Board of Supervisors on this matter, and takes official notice of its action.

D.03-02-029 did not specifically address the length of time for which the Commission's grant of authority to use the 2-1-1 dialing code should be made. Utilities and other frequent participants in Commission proceedings generally know that most Commission decisions, resolutions, and actions can be later modified or rescinded if a showing of sufficient grounds to do so is made in a filing before the Commission. However, most I&R providers and county governments are not frequent participants in Commission proceedings, and may benefit from some clarification of this point. The grant of authority to use the 2-1-1 dialing code in a county or group of counties is for an indefinite term and may be revised or rescinded if a showing of sufficient grounds to do so is made to the Commission. For the reasons cited in the previous paragraph, the Commission should consider a resolution by the Butte County Board of Supervisors as a crucial part of any showing that the authority to use the 2-1-1 dialing code for comprehensive I&R service for Butte County should be rescinded, reassigned, or modified. A letter to the Commission's Executive Director could serve to initiate such a process. Any such process should provide notice to all affected parties and an opportunity to be heard.

The Communications Division of the CPUC concludes that the application letter filed by Help Central meets the requirements set forth in the Commission's order and recommends that the Commission approve this filing. Commission approval is based on the specifics of the application letter, and does not establish a precedent for the contents of future filings or for Commission approval of similar requests.

This is an uncontested matter in which the resolution grants the relief requested. Accordingly, pursuant to P.U.Code Section 311 (g) (2) and Rule 14.6(c) (2) of the Commission's Rules of Practice and Procedure, the otherwise applicable 30-day period for public review and comment is being waived.

Findings

1. Help Central Inc., hereinafter referred to as Help Central, sent its application letter for certification as the 2-1-1 service provider for Butte County to the Commission on March 22, 2013.
2. Help Central filed a supplemental letter to include Public Safety matter to the Commission on May 16, 2013.
3. Help Central will provide immediate public safety impact during non-emergencies, emergencies and disasters such as providing a web-based and call-in information call center addressing public safety 24 hours/day, 7 days/week and will work closely with the Office of Emergency Services to assure that the partnership of 9-1-1 and 2-1-1 is effective.
4. California Alliance of Information and Referral Services (CAIRS) submitted written comments in support of Help Central's application for provision of 2-1-1 services in Butte County on April 15, 2013. No other comments were submitted.
5. Help Central's application provides sufficient information to meet the four major sections of the 2-1-1 application process required by D. 03-02-039.

6. Bill Connelly, Chairman of the Butte County Board of Supervisors sent a letter to the Commission on February 19, 2013, endorsing Help Centrals application to serve as the 2-1-1 provider for Butte County.
7. The Communication Division of the CPUC concludes that Help Central's application meets the requirements established by D. 03-02-029 to use the 2-1-1 dialing code.

THEREFORE, IT IS ORDERED that:

1. Help Central Inc. is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Butte County.
2. This authority is granted for an indefinite term, and is subject for review upon showing sufficient grounds to revise or rescind the term. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If Help Central Inc. cannot implement 2-1-1 dialing within a year after the Commission's approval of Help Central Inc.'s application for provision of 2-1-1 service in Butte County and the needed tariffs of the telecommunications service providers ordered in Ordering Paragraphs 3, 4, and 7 of D.03-02-029, then, barring further Commission action, the certification of Help Central Inc. shall lapse so that another I&R provider may apply to offer service in a service territory that includes Butte County.
4. Help Central Inc. shall notify the Director of the Communications Division in writing of the date 2-1-1 service is first rendered to the public, within five business days after service begins.

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission at its regular meeting on June 27, 2013 adopted this Resolution. The following Commissioners approved it:

PAUL CLANON
Executive Director