California Public Utilities Commission

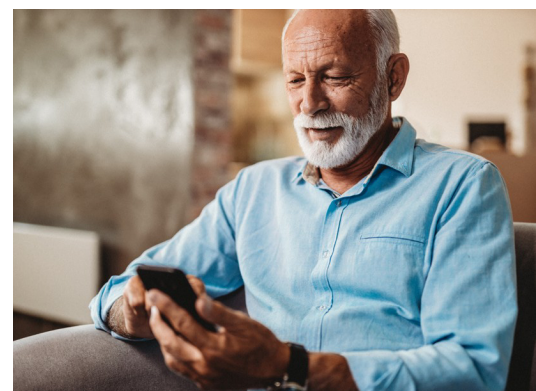# CALIFORNIA LIFELINE PROGRAM ASSESSMENT & EVALUATION

SACRAMENTO STATE

California Public Utilities Commission

California LifeLine Program Evaluation

May 2022

Prepared by the Consensus and Collaboration Program and Institute for Social Research

California State University, Sacramento

Copies of this report are available from California Public Utilities Commission

Contents

GUIDELINES FOR READING THE EVALUATION DOCUMENT

The following information (and associated Acronym List and Glossary of Terms) is provided to guide the use of this Evaluation.

General

- The word "LifeLine" containing two capital "L"s refers to the California LifeLine program. "Lifeline" with one capital "L" refers to the federal program.

- The terms *wireless* and *wireline* are are italicized throughout the document to better differentiate them from other terms.

- A distinction is made in the narrative when referring to the California Public Utilities Commission (CPUC) Commission as a decision-making body, versus the Communications Division of CPUC.

- Key issues are presented under various sections. However, all sections have interconnected topics, therefore recommendations related to one area may and often do have impacts on others.

- Recommendations are supported in narrative form throughout the document and appear in summary at the end of the Evaluation, beginning on page 89.

- References to "stakeholder groups" include: Community-based organizations (CBOs), tribal representatives, advocacy groups, state and county agency representatives, Communications Division staff assigned to the LifeLine program, current and former CPUC Commissioners, members of CPUC Working Groups and committees, *wireline* and *wireless* telephone Service Providers., , other existing or potential LifeLine outreach partners, and eligible/current/former customers.

- Adhering to confidentiality protocols and to avoid direct attribution, stakeholders participating in this Evaluation via interviews, focus groups or surveys, were advised that the information they shared would be used in summary form and not attributed to any individual person. The Evaluation Team has aggregated most of the collected information and uses qualitative terms such as "few", "many", "most", or "majority" to indicate the frequency in which a statement/ sentiment was repeated, and to protect stakeholders from being directly identified.

    Any discussion of population demographics is specific to those individuals/households who meet LifeLine income or program criteria and are eligible for the program.

COVID Related Impacts

- The Evaluation process took place during the COVID-19 global pandemic (COVID). COVID-related impacts and constraints are summarized below:

    - LifeLine renewals were suspended/frozen for the duration of the Evaluation process so that customers could maintain their service during COVID. That decision is assumed to be beneficial to customers; however, it did artificially maintain enrollment numbers which made accurate discussion and assessment of renewal trends for this period impossible.

    - The Communications Division developed a variety of updates to improve renewal processes that were subsequently infeasible to implement and evaluate due to the renewal freeze. Details related to the renewal freeze are discussed throughout the Evaluation.

- The following COVID-related factors significantly impacted the number and range of focus group participants:
    - Potential focus group participants were not utilizing in-person services in a physical space in which focus group recruitment and enrollment generally occurs.
    - Evaluation Team members were prohibited by California State University policy from traveling during COVID, thus impacting recruitment and delivery of in-person focus groups sessions.
    - In-person focus groups facilitate easier distribution of incentives, such as a meal, that is typically a draw for participants who might otherwise not participate.
    - "Survey fatigue" experienced in a variety of domains due to the abundance of government and non-governmental organization/CBO distributed surveys related to the impacts of COVID was a likely factor impacting focus group enrollment.[1]

"Response Bias"

- A statewide survey of LifeLine customers was administered for this Evaluation. While these survey respondents can be used as a broad description of customers, the answers do not account for response biases (i.e., some groups are more likely to respond to surveys than other groups). The LifeLine program does not collect detailed demographic information about subscriber households (for example, race, ethnicity, etc.) so it was not possible to adjust responses to reflect the demographics of the LifeLine program participants.

Contractual Scoping Changes

- The Evaluation process was originally scoped to begin in June 2020 and conclude June 2021. However due to several administrative delays, research efforts ultimately commenced in February 2021 and concluded December 2021. Due in part to these delays as well as the inability to access source data in a timely manner, the deadline for submission of this Evaluation report was extended several times to March 2022. Finalization of report formatting and design occurred in April 2022.

- Due to unanticipated contractual restrictions, the University was unable to provide financial incentives to low-income enrolled and/or eligible LifeLine customers to participate in focus group discussions as is common practice to enhance participation. This, in addition to the COVID-related factors discussed above, impacted overall focus group recruitment. The Evaluation Team was able to supplement this data collection effort with an increase in personal, telephone and virtual web-based stakeholder interviews.

- The Evaluation process was initially scoped to include in-person focus groups comprised of seven to 20 participants each hosted in representative regions of the state. Due to the impacts of COVID, eight virtual focus groups and one in-person focus group, were conducted engaging a total of 61 participants. However, while the original scoping included 15 stakeholder interviews, the Evaluation process ultimately included 93 stakeholder interviews.

- The Evaluation effort was originally scoped to produce four, approximately 15 – 25 page summative reports addressing the four key research identified by the Legislative Analyst's Office (LAO). However, the Evaluation Team in consultation with Communications Division staff determined that instead of separate reports, all research areas should be considered in totality as they each inform and impact each other.

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[1]   https://www.frontiersin.org/articles/10.3389/fsurg.2021.690680/full

Constrained Access to Source Data and Program Updates

- A variety of source information and data was requested to support and inform the Evaluation process but was either unavailable or unable to be shared until the writing of the final Evaluation report was well underway. In some cases, this impacted the inclusion of the most up-to-date and accurate information in the Evaluation.

- During the Evaluation process, LifeLine underwent a variety of policy changes and programmatic updates, many of which are intended to improve the areas in which this Evaluation was focused. Information about the existence or status of those policies was not readily available throughout the Evaluation process. To the extent possible, details related to those updates are included or referenced in this report, however, there is a likelihood of some inaccuracies given the timeliness of receiving the updates which limited the ability for said updates to be incorporated herein. When there was not adequate time to update Evaluation content, information was added to the appendices.

LIST OF ACRONYMS

ACP Affordable Connectivity Program

ACS American Community Survey

API Application Programming Interface

BCP Budget Change Proposal

BRD Business Requirements Document

CAB Consumer Affairs Branch

CARE California Alternate Rates for Energy

CBO Community Based Organization

CDC Center for Disease Control

CDCR-DAPO California Department of Corrections and Rehabilitation, Division of Adult Parole Operations

COLR Carrier of Last Resort

CPCN Certificate of Public Convenience and Necessity

CPUC California Public Utilities Commission

DAP Direct Application Process

DAR Direct Application Request

DDT Deaf and Disabled Telecommunications

DOF Department of Finance

DSS Department of Social Service (State or County distinction included in narrative)

EBB Emergency Broadband Benefit

ECP Estimated Caseload Projections

ETC Eligible Telecommunications Carriers

FERA Family Electric Rate Assistance

FCC Federal Communications Commission

FPL Federal Poverty Line

GB Gigabyte

GAO Government Accountability Office

GO General Order

IDAF Identity Authentication Form

IDV Identity Verification

IEH Independent Economic Household

IP Internet Protocol

IT Information Technology

LAO Legislative Analyst's Office

LIOB Low Income Oversight Board

NLAD National Lifeline Accountability Database

ODI Office of Digital Innovation

OIR Order Instituting Rulemaking

PDF Portable Document Format

PPI Personal Protected Information

PUMS Public Use Microdata Sample

RFP Request for Proposal

RWG Renewal Working Group

sFTP Secure File Transfer Protocol

SPIA Service Provider Intake API

TANF Temporary Assistance for Needy Families

TPA Third Party Administrator

TTY Teletypewriter

ULTS Universal Lifeline Telephone Service

ULTSAC Universal Lifeline Telephone Service Administrative Committee

USAC Universal Service Administrative Company

VoIP Voice over Internet Protocol

GLOSSARY OF TERMS

Broadband is the transmission of wide bandwidth data over a high-speed internet connection

Carrier of Last Resort is the term used to describe a telephone corporation that is required to fulfill all reasonable requests for service within its service territory

Churn is the rate at which customers stop doing business with an entity. It is commonly expressed as the percentage of telephone service subscribers who discontinue their subscriptions within a given period

Commission refers to the CPUC decision-making body of Commissioners

Communications Division refers to CPUC staff in charge of oversight and implementation of the California LifeLine program

COVID refers to the global coronavirus pandemic COVID-19 that occurred throughout the duration of this Evaluation

Customers refer to individuals who are enrolled in the California LifeLine Program

Economic Unit is the term used by LifeLine to indicate eligibility for the program: "individuals who live together and share income and expenses" and to distinguish it from a "household" in which there is a shared address but separate incomes and expenses

Eligible Customers refers to individuals who are not currently enrolled in LifeLine but who are eligible and who may or may not have been previously enrolled

Evaluation refers to the totality of this report

Household is the term used by the FCC to indicate eligibility for the Lifeline program which is defined as "one-per-household" meaning that more than one member of the same household is not eligible for the program

Lifeline (lowercase l) is the term used to refer to the federal program

LifeLine (uppercase L) is the term used to refer to the California program

National Verifier is shorthand for the Lifeline National Eligibility Verifier, a centralized online data system that determines whether customers are eligible for Lifeline benefits. USAC manages the National Verifier and provides customer service through the Lifeline Support Center

Obama Phone is the colloquial term many stakeholders used to refer to free phones/phone service

Enrollment Rate is the proportion of eligible households participating in the LifeLine program (households enrolled/households eligible)

Service Providers refers to both *wireline* and *wireless* telephone carriers

Smart Phone is a mobile phone that performs many of the functions of a computer, typically having a touchscreen interface, internet access, and an operating system capable of running downloaded applications

Request for Proposal is a business document that announces a project, describes it, and solicits bids from qualified contractors to complete it

Take-up Rate refers to the percentage of eligible population members who enroll with a Service Provider and/or enroll in the LifeLine program

Teletypewriter refers to a communication device used by people who are deaf, hard-of-hearing, or have severe speech impairment

University is a narrative abbreviation for California State University Sacramento

Wireless refers to mobile telephone services/devices

Wireline refers to fixed telephone services/devices, otherwise known as "landline"

EXECUTIVE SUMMARY

PURPOSE

The mission of California Public Utilities Commission's (CPUC) LifeLine Program (LifeLine) since its establishment in 1987, is to provide "high-quality basic telephone service at affordable rates to the greatest number of California residents…by making residential service affordable to low-income citizens." (Moore Universal Telephone Service Act).

There are currently 40 *wireless* and *wireline* phone Service Providers who offer free or discounted phone service to approximately 1.3 million low-income households in California. The LifeLine program is supported by an annual budget of over $400 million and serves approximately 34 percent of eligible households in the state. However, this enrollment rate has continued to fall short of CPUC's projected enrollment estimates and has generally not fulfilled the potential of the LifeLine program based on customer need and LifeLine's allocated budget.

Consequently, a 2019 Legislative Analyst's Office (LAO) Report[2] called for the CPUC to conduct an external evaluation of LifeLine with the goals of increasing enrollment and renewal rates and improving the accuracy of caseload estimates to determine appropriate resource allocation. CPUC contracted with California State University Sacramento (University) to conduct the external evaluation of the LifeLine program (Evaluation).

Consistent with factors raised in the LAO report, the University was advised to investigate the following four key aspects to further understand the factors impacting low enrollment and renewal rates as compared to the total number of eligible households in California, provide necessary information to CPUC for future LifeLine Program analyses and modifications, and provide possible strategies to increase LifeLine's reach to low-income households in the state:

- Program and policy shifts, and administrative requirements
- LifeLine enrollment and renewal processes
- Market competition, program benefits, and customer experience
- Program awareness and information dissemination

PROCESS

The Evaluation was initially scoped for June 2020 to June 2021[3] to fulfill the LAO recommendation and provide necessary information to CPUC for future program analysis and modifications. After modifications were made to the timeline, the Evaluation was ultimately conducted from February 2021 to December 2021 and focused on the previous three-years of program implementation.

The Evaluation used existing program data and collected firsthand data via personal interviews with 93 stakeholders, nine virtual focus group meetings of eligible and current LifeLine customers, and a statewide survey which collected over 5,000 individual responses. See box below for additional detail on data sources informing this Evaluation. Definitions for terms and acronyms commonly used in this Evaluation, several of which are referenced below, can be found on pages 4 and 5.

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2   2019. A Review of LifeLine Budget Estimates and Enrollment Process. Legislative Analyst's Office. *https://lao.ca.gov/Publications/Report/3995*

3   Please see section: Guidelines to the Reader, subsection: Contractual Scoping Changes for additional information.

Research activities included analysis of LifeLine enrollment and renewal data, analysis of LifeLine Service Provider coverage information, offerings available by LifeLine Service Providers, assessment of marketing and outreach methods to the general population and key demographic groups, assessment of the current enrollment and renewal processes, assessment of customer experience with the LifeLine program, and examination of program operations and administration requirements.

DATA SOURCES INFORMING THIS EVALUATION

This Evaluation is based on the collection and review of multiple data and information sources described below:

Literature Review | Existing documentation focusing on historical trends in enrollment for the federal Lifeline program, particularly in California, and relevant studies on factors that influence "take up" rate of income-eligible public benefit programs.

Policy, Administrative, and Program Information | Program documents, memoranda, meeting agendas and minutes, and related reports produced by CPUC and the Third-Party Administrator (TPA) and their data partners.

Key Stakeholder Interviews | Ninety-three key stakeholder interviews with: community-based organizations, Tribal representatives, advocacy groups, state and county agency representatives, CPUC Communications Division staff assigned to the LifeLine program, TPA staff, current and former CPUC Commissioners, members of CPUC Working Groups and committees, *wireline* and *wireless* Service Providers, and other existing or potential LifeLine outreach partners and current/former eligible customers.

Focus Group Meetings | Nine virtual, multi-lingual current and eligible customer focus group meetings representing various regions throughout the state.

Statewide LifeLine Survey | Survey of current LifeLine customers conducted from September – October 2021. *Wireless* customers received an invitation by text and 4,481 surveys were completed. *Wireline* customers were contacted via telephone and 305 individuals completed the survey. In addition, a link to the online survey was posted on the californialifeline.com website and 396 individuals completed the survey via the website.

Service Provider Survey | Survey of telephone Service Providers that offer LifeLine services to eligible low-income population conducted in June 2021. Service Providers were informed of the survey at a California LifeLine Working Group meeting and provided a link to complete the survey. Twenty-four individuals representing eight companies completed the survey.

LifeLine underwent significant policy changes and programmatic updates in 2020 – 2021 amid the COVID-19 global pandemic (COVID) and during the period in which data collection and analyses

were being conducted for this Evaluation. These factors impacted program implementation in unique ways. Two notable examples are the pandemic renewal suspension for existing LifeLine customers implemented during the data collection period of this Evaluation from March 18, 2020 through December 31, 2021[4], and automation of eligibility determination for renewing customers who are also enrolled in CalFresh, implemented in November 2021. Similarly, COVID resulted in ongoing and profound economic and societal impacts for low-income households[5] such as disproportionate increase in job loss and inability to pay bills. Recent policy and programmatic updates and anticipated impacts of COVID are considered throughout this report.

EVALUATION TEAM

As noted above, CPUC contracted impartial services from the University to conduct the Evaluation, specifically, the Consensus and Collaboration Program (CCP) to conduct the qualitative aspects of the Evaluation and the Institute for Social Research (ISR) to conduct the quantitative aspects. CCP is a mission-driven organization that works to expand the collaborative capacity of agencies, organizations, and the general public to work together to make more effective public policy. ISR is an interdisciplinary center that works to improve programs and policies within the Sacramento region and throughout the state. The Evaluation Team utilized Communications Division staff as subject matter experts to provide background and context, advise on technical issues, and to connect the Evaluation Team with relevant stakeholders to inform the process.

The Evaluation Team's role included the following:

- Conduct background research, outreach, data collection and analysis, regional assessment/survey analysis, and other associated tasks necessary to the Evaluation.
- Act as a content aggregator.
- Utilize data and information acquired from the TPA, CPUC and Service Providers to inform research, outreach, assessment, and survey design, including preparing documents, distributing requests, providing organizational services, collecting results, and conducting a review process in collaboration with CPUC reviewers.
- Analyze patterns and trends of information collected in interviews, focus groups and surveys, and prepare qualitative and/or quantitative findings.
- Manage, supervise, and conduct the research, including attending to the quality, timeliness, and alignment with the goals of the Evaluation, and ensuring research costs reflect work produced and budget expectations.
- Prepare recommendations for future program analysis and modifications.
- Conduct most administrative functions of this Evaluation.

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4   *https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M339/K513/339513655.PDF*. Note: The pandemic renewal suspension has been extended from December 31, 2021 until March 31, 2022. *https://www.fcc.gov/document/wcb-extends-prior-covid-lifeline-program-waivers-mar-31-2022*.

5   The Impact of the First Year of the COVID-19 Pandemic and Recession on Families with Low Incomes, Sept 20, 2021. Assistant Secretary for Planning and Evaluation (ASPE). *https://aspe.hhs.gov/reports/covid-19-impact-low-income-families*

The Evaluation Team included the following individuals:

Name	Organization	Roles on this Project
Cynthia Chase	CCP	Project Manager
Meagan Wylie	CCP	Project Coordinator
Shannon Williams, Ph.D.	ISR	Research Lead
Richard Mason	ISR	Survey Manager
James Vergara	ISR	Research Analyst
Alex Lascher-Posner	ISR	Research Analyst
Mindy Meyer	CCP	Senior Staff / Advisor
Dave Ceppos	CCP	Principal in Charge
Deborah Hunt, Ph.D.	CCP	Program Director

KEY FINDINGS

The following section summarizes the Evaluation's key findings regarding the extent to which the LifeLine program is meeting its intended purpose to make affordable telecommunications available to low-income California residents. Findings are organized by key aspect of the LifeLine program in alignment with the Evaluation sections:

- LifeLine Program Reach
- Program Operations and Implementation
- Service Offerings and Market Competition
- Customer Experience
- Program Awareness, Marketing, and Community Outreach

LifeLine Program Reach

The Evaluation analyzed the extent to which the LifeLine program benefits eligible households throughout the state and by individual types of households. The Evaluation found:

- The LifeLine program overall is meeting approximately one third of eligible customers and is an under-utilized benefit for California residents. In specific:
  - The Lifeline program is reaching more eligible households in the San Joaquin Valley and Los Angeles County regions as compared to other regions across the state.
  - The region that is most notably under-served is the North Coast region with the lowest overall enrollment rates, and a significantly lower proportion of *wireless* customers when compared to the rest of the state. Other coastal regions (San Francisco Bay Area and Central Coast) also have lower enrollment rates as compared to the state average.
  - Households with individuals who speak languages other than English are disproportionately underserved in the state with an overall estimated enrollment rate of four percent of the eligible households. The discrepancy is most pronounced for languages other than Spanish, as Spanish-language enrollment represents the majority of non-English Lifeline Customers.
  - Tribal affiliated households have a very low enrollment rate of one percent of eligible tribal customers.
  - Teletypewriter (TTY) users are similarly not accessing the Lifeline program benefits, with an estimated enrollment rate of one and a half percent of eligible customers.

- The methodology used to estimate enrollment take-up rate needs refinement to reflect more accurate enrollment goals for the LifeLine program population.
- There is no formal multi-year Strategic Plan guiding the work of the CPUC in its efforts to meet its goal of providing phone service to low-income California residents.
- LifeLine enrollment numbers have only been reported as statewide totals, and data regarding enrollment rates among various regions and targeted households are not readily available, making it difficult to evaluate program reach and effectiveness.
- Visualization maps to indicate service gaps via region and population for both *wireless* and *wireline* would greatly increase the ability to target outreach and enrollment efforts.

Program Operations and Implementation

The Evaluation describes the main administrative entities and processes for administration and implementation of the LifeLine program. Challenges in both the administrative processes and program oversight are identified, including:

- LifeLine is effectively a social benefits program, addressing a de-regulated industry, administered by a utility regulator. The program faces limitations in its goals to serve low-income households and to ensure the effective functions of CPUC. This contributes to a program structure that limits the effectiveness, and responsiveness to customer needs, and enrollment rates.
- The majority of current Communications Division staff are very new to the program, with the longest amount of longevity at approximately three years. There is also a high degree of turnover; all of which contributes to limited institutional knowledge and expertise for the administration, implementation, or oversight of the program.
- The program is organized such that Communications Division staff must be highly reliant on the TPA, IT consultant, and Service Providers to administer the program.
- Historically there has been insufficient policy and procedural documentation directing program implementation. While work has been done to increase documentation in the last two years, additional content and clarity is needed to sufficiently support Communications Division staff.[6]
- The *wireline* and *wireless* aspects of LifeLine need to be considered and implemented as distinct programs with different customer needs.
- The current enrollment/renewal processes are not streamlined or expedient (though improvements to automate renewal eligibility checks have been implemented in November 2021). These processes have historically relied on high-cost, extended time, paper enrollment.
- There is a strong desire among stakeholders to access and engage all aspects of program information via digital methods.
- Expanding the list of acceptable forms of identification and simplifying the submittal process can address stakeholders' hesitancy to enroll due to documentation requirements and/or difficulty to provide some forms of documentation.
- Formal partnerships/agreements with other state benefits programs to confirm program-based eligibility would significantly streamline and likely increase LifeLine program enrollment/renewal.

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6   In 2019 when the contracted TPA transitioned from Conduent to Maximus, one month of activity was lost due to lack of documentation.

- The Communications Division has implemented recent improvements to general program operations and the renewal process. However, improvements and changes implemented during COVID (calendar years 2020/2021) have not been assessed for effectiveness due to extensions in the enrollment renewal freeze, thus limiting program analysis and further revisions.
- The federal government recently approved significant investments in phone and broadband infrastructure with specific amounts dedicated to tribal lands. Leveraging these investments can partially address the major LifeLine infrastructure disparities that exist in rural areas and on tribal lands.

Service Offerings and Market Competition

The Evaluation describes how telephone Service Providers support the LifeLine program and the primary methods in which they conduct outreach and enrollment for eligible customers. Evaluation findings include:

- LifeLine is successful providing free or low-cost service, but it is not widely considered a highly effective service by most customers. Most stakeholders surveyed/interviewed report having additional market rate phones to augment service limitations of LifeLine devices.
- There is little to no evidence to indicate the presence of actual market competition among LifeLine service offerings since most customers reported no awareness of multiple Service Providers providing the LifeLine program.
- Enhancing the CPUC LifeLine website could create an online marketplace that would allow customers to compare and choose a Service Provider more effectively.
- Instituting an eligibility authorization number system, or similar, in which customers can choose their Service Provider would allow for actual consumer choice and potential market competition to improve the quality of LifeLine offerings.
- Service Providers are at liberty to market the program to the degree and the manner in which they choose, with very little unifying prescribed text, branding or other information from CPUC about the program.
- The lack of reporting requirements regarding Service Provider marketing and outreach strategies makes it challenging to measure the impact of various efforts on program enrollment.

Customer Experience

The Evaluation reviews customer feedback from focus groups, stakeholder interviews, and a statewide survey about the purposes, benefits, and challenges to access and participate in the LifeLine program. It also includes subsections on eligible populations with unique needs and challenges. Findings from the Evaluation include:

- Due to the evolution of telecommunications technology and a societal shift from landline use to the prevalent use of cell phones as personal, mobile devices, there is now a fundamental disconnect between the mission of the LifeLine program, the way in which the program is implemented, and the way eligible customers use telecommunications tools.
- Stakeholder feedback expressed that LifeLine is experienced by some as a "second rate program" for "second class citizens."
- Having Street Teams as the primary interface for LifeLine reduces legitimacy and trust in the program.

- While stakeholders reported concern about providing personal data via a Street Team for enrollment, they also reported that the digital enrollment process utilized by Street Teams was fast and easy.
- Utilizing trusted sources for outreach, enrollment and renewal will increase the legitimacy of the program and customer willingness to engage with the program. It will likely also simplify enrollment and renewal processes.
- Collecting multi-lingual customer feedback at as many interfaces as possible will help CPUC improve the customer experience.
- LifeLine staff are hired to administer what is effectively a benefits program without commensurate benefits program training and experience. Providing training opportunities for staff to help them better understand the needs of the target population can improve customer experience and effectiveness of the program. Providing such opportunities to Commissioners and Working Group / committee members would also be beneficial to enhance systemic understanding of the program and customer needs.

Program Awareness, Marketing and Community Outreach

The Evaluation discusses the general lack of awareness and recognition of the LifeLine program by low-income populations and the organizations that serve them. Specific options to increase community outreach and engagement are discussed. Findings include:

- The absence of general population awareness of the LifeLine program either by name or as a phone program for low-income California residents.
- CPUC has no budget for marketing, outreach or promotion of the LifeLine program resulting in near complete reliance on Service Providers to conduct their own marketing.
- Relying on Service Providers to market the program results in confusion and misinformation for customers and a lack of awareness by eligible customers in need of program services.
- The CPUC LifeLine website requires significant redesign to meet the current needs of eligible customers, Service Providers, and other stakeholders who engage with the program; and to serve as a more inviting conduit to potential customers.
- Specific populations are disproportionately underrepresented in program enrollment including tribal members, non-English speakers, and TTY users.
- Tribal members are especially underserved and require engagement strategies that are specific to the needs of their communities; trusted communication sources are critical to increase awareness and enrollment.
- No formal relationships have historically existed between CPUC and other state departments that could be leveraged to enhance marketing and outreach to eligible customers.
- Most stakeholder groups interviewed/surveyed indicated that additional eligible customers would utilize the program if there was increased awareness and marketing of the program, provided through trusted sources such as established Community Based Organizations (CBOs), government agencies, and reputable local news outlets.
- Most stakeholder groups requested support and marketing materials to help promote LifeLine.

INTRODUCTION & BACKGROUND

The California Public Utilities Commission (CPUC) contracted with California State University, Sacramento (University) to conduct an independent evaluation (Evaluation) of the California LifeLine program (LifeLine or program) to provide insights on Californians' use of, and needs for, low-cost phone services throughout the state, and to assess the extent to which the LifeLine program is meeting its intended purpose to provide affordable phone services for California's low-income residents.

The following report provides a comprehensive overview of research findings organized by key aspects of the LifeLine:

- **Program Reach and Effectiveness** | This section focuses on the overall enrollment trends of LifeLine customers statewide and regionally and provides rates of program enrollment for high-need populations. A description of current LifeLine customers is provided as well as a discussion of the shift in the reliance on telecommunication services from a household utility to essential personal devices.

- **Program Operations and Implementation** | This section describes the main administrative entities and processes for administration and implementation of LifeLine program. Challenges in both the administrative processes and program oversight are identified. Conditions that impact customer experiences are introduced in this section and elaborated on in the Customer Experience section of this report (described below).

- **Phone Service Providers and Market Competition** | This section describes how telephone Service Providers support the LifeLine program and the primary methods in which they conduct outreach and enrollment for eligible customers.

- **Customer Experience** | This section provides customer feedback from focus groups, stakeholder interviews, and a statewide survey about the purposes, benefits, and challenges to access and participate in the LifeLine program. It also includes subsections on specific eligible populations with unique needs and challenges.

- **Program Awareness, Marketing and Community Outreach** | This section addresses the level of awareness and recognition of the LifeLine program by low-income populations and the organizations that serve them. Specific options to increase community outreach and engagement are also discussed.

The conclusion of this report includes a series of recommendations aligned with the key aspects of the LifeLine program outlined above.

A detailed description of the data collection methodologies used in this Evaluation is provided in Appendix A.

Federal Lifeline and California LifeLine Program Overview

Lifeline is a Federal Communications Commission (FCC) subsidy program that aims to expand access to phone and internet services for low-income Americans, with the ultimate goal of universal access to affordable service. Since inception in 1985, the federal Lifeline program has helped millions of low-income households access affordable *wireline, wireless,* and internet service[7]. To be eligible for the federal subsidy, households must either have an income that is at or below 135 percent of the Federal Poverty Line (FPL)[8] or participate in one of several qualifying assistance programs, such as Medicaid or the Supplemental Nutrition Assistance Program (SNAP).

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7   *Wireless* and internet subsidies were not immediately available at the program's inception but were added later.

8   Federal Lifeline qualification pathways: *https://www.lifelinesupport.org/do-i-qualify/*

State enrollment in Lifeline was mandated by the Telecommunications Act of 1996[9], however, CPUC began sponsoring California's state-implemented "LifeLine" program in 1987, issuing its own subsidy to supplement what was provided by the FCC. Building from The Moore Universal Telephone Service Act[10], California's LifeLine program also expanded access to include households that are at or below 150 percent of the FPL amounting to approximately 400,000 additional low-income Californians being eligible for the LifeLine program in 2021.[11]

Implementation of the California LifeLine program is regulated by General Order (GO) 153[12], effective December 1, 2011. Updates to regulations are made via the CPUC's rulemaking process. Significant changes in LifeLine implementation occurring over the last eight years including over the course of this Evaluation period are summarized in Appendix B.

Both the FCC and CPUC have implemented regulation changes to the programs over the last several decades to reflect changing phone trends and emerging technologies, in line with the FCC program's stated goal of continually subsidizing "advanced" telecommunications services. The scope of the federal Lifeline program was broadened significantly in 1997 under the Universal Service Order by raising the federal support amount and modifying state matching requirements to increase affordability for low-income households.

Due to significant concerns over waste, fraud, and abuse, a 2012 reform to the FCC regulations began requiring federal Lifeline customers to demonstrate proof of income for eligibility verification and adopted the rule of one-per-household while defining households as "economic units[13]." The stated intention of the "economic unit" definition was to allow different low-income families at the same address to sign up for a shared discounted *wireline* phone. California updated its definition of household in 2011 to "individuals who live together and share income and expenses," thereby enhancing the opportunity for independent individuals sharing the same address to qualify for the subsidy[14], consistent with long-standing goals of CPUC. For example, roommates who maintain separate financial "households" but reside in the same dwelling would be eligible. The exception to the one-per-household rule is when there is a member of the household who is eligible for Deaf and Disabled Telecommunications (DDT) or is a teletypewriter (TTY) user.

At the onset of the federal Lifeline program, a single or shared landline/ home phone was the typical option for telecommunications. Though mobile phones were on the market in the 1980s, they were considered a luxury and cutting-edge device. Cell phones began increasing in accessibility and affordability in the mid-1990s, as technology improved, costs for making calls decreased, devices became easier to manufacture, and cellular infrastructure was being built nation-wide. While subsidies for *wireless* phone services were being offered as early as 2005 in some parts of the nation, the California LifeLine program was not expanded to include *wireless* Service Providers until 2014. This expansion was implemented to address a trend of declining enrollment in the *wireline* program. Currently, about 85 percent of LifeLine customers receive subsidies for *wireless* services.

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9   Telecommunications Act of 1996: *https://www.fcc.gov/general/telecommunications-act-1996*

10   AB 2213, 2010, Moore Universal Telephone Service Act. Regular Session 2009-2010.

11   American Community Survey Data – 2019, 1 year data.

12   GO 153: *https://docs.cpuc.ca.gov/published/General_order/14871.htm*

13   FCC FORM 5631, Lifeline Program Household Worksheet. *https://www.usac.org/wp-content/uploads/lifeline/documents/forms/LI_Worksheet_NVstates-1.pdf*

14   Decision 21-09-023 *https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M410/K139/410139953.PDF*

Access to phones (particularly cell phones) is considered a current necessity and reflects a shift in technology from *wireline* phones being a household utility tied to a specific location, to *wireless* phones being an essential *personal* device, continuously carried by individuals for a variety of purposes such as voice calling, text messaging, exchanging emails, retrieving information, entertainment and similar. *Wireless* phones have provided customers increased mobility, privacy, and access to necessary and desired services.

The FCC underwent another modernization effort in 2016 to include broadband as a support service in its program and began requiring minimum service standards for Lifeline-supported services. The FCC also established the Lifeline National Eligibility Verifier (National Verifier) that same year. The National Verifier is a centralized online data system that determines whether customers are eligible for Lifeline benefits.

California is one of three *opt-out* states that do not participate in the National Verifier. California maintains its own identity and eligibility verification process which is administered through a third-party administrator (TPA). The current TPA contracted with the CPUC is Maximus. The scope of work for Maximus as the California LifeLine TPA includes customer eligibility determination, call center services, web-based enrollments and renewals, and document intake and processing.

California continues to utilize the economic unit rule wherein each household is allowed one discounted plan, for either *wireline* or *wireless service,* but not both regardless of how many individuals make up that economic unit. For example, a married couple sharing finances at the same address, or a parent with dependent children living at the same residence, are eligible for one LifeLine phone. To receive the state LifeLine subsidy, households must either have an income that is at or below 150 percent of the FPL, or participate in one of seventeen qualifying assistance programs[15]. A full list of LifeLine qualifying programs is included in Appendix C.

Table 1. California LifeLine Income Limits Effective June 1, 2021 to May 31, 2022

Household Size	Annual Income Limit
1 – 2	$28,500
3	$33,100
4	$40,300
Each Additional Member	$7,200

Minimum service standards by the FCC and CPUC and respective subsidy amounts have been updated annually since 2016. In 2021 during this Evaluation period, California provided an additional monthly subsidy of up to $14.85 per month as well as service connection and conversion discounts of up to $39.[16] The monthly subsidy increased to $16.23 beginning in January 2022.

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15   California LifeLine Eligibility Requirements:
      https://www.cpuc.ca.gov/customer-support/financial-assistance-savings-and-discounts/lifeline/california-lifeline-eligibility#qualify

16   Decision (D.) 20-10-006 established the California LifeLine Specific Support Amount (SSA) and Minimum Service Standards (MSS) for December 1, 2020 thru December, 2021.

Table 2. LifeLine Minimum Service Standards and Specific Support Amounts effective December 1, 2020 through December 31, 2021.

WIRELESS

California *Wireless* LifeLine Services*				
Plan	California Support Amount	Federal Support Amount	Voice and Texts	Monthly Data Limit
Basic (Less than 4.5 GB data)	$12.85	$5.25 (Goes to $0 12/1/21)	Unlimited	4 GB
Basic	$12.85	$9.25	Unlimited	4.5 GB (FCC)
Standard	$14.85	$9.25	Unlimited	6 GB
Upgrade /Family	$14.85	$9.25	Unlimited	12 GB

No copayment for Basic and Standard plans. Some carriers may choose to charge a copayment for upgrades/family plan.

WIRELINE

California *Wireline* LifeLine Services		
Plan	California Support Amount	Federal Support Amount
Standard* (Phone Only)	$16.85	$5.25
Bundled (Phone and fixed Internet Connection)	$14.85	$9.25

Minimum copayment is $5 per LifeLine customer but can vary by telephone Service Provider. For more information, see the FCC informational page on their website.

With federal support for voice services declining over the last several years, and with the elimination of voice support scheduled for the end of 2021, the state legislature authorized replacing up to $5.25 per month for *wireline* voice-only customers on September 24, 2021[17]. However, on November 5, 2021, the FCC postponed the elimination of voice support until December 2022,[18] therefore California's make-up subsidy for federal voice support remains at $2.00.

17   D. 21-09-023 *https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M410/K139/410139953.PDF*

18   FCC *Wireline* Competition Bureau, Order DA-21-1389, "Lifeline and Link Up Reform and Modernization; Telecommunications Carriers Eligible for Universal Service Support; Connect America Fund," issued November 5, 2021: *WCB Pauses Lifeline Phase-Out and Mobile Data Capacity Increase | Federal Communications Commission (fcc.gov)*

Table 3. LifeLine Minimum Service Standards and Specific Support Amounts effective January 1, 2022 through December 31, 2022.

WIRELESS

California *Wireless* LifeLine Services*				
Plan	California Support Amount	Federal Support Amount	Voice and Texts	Monthly Data Limit
Basic	$12.85	$9.25	Unlimited	At least 4.5 GB
Standard	$16.23	$9.25	Unlimited	At least 6.0 GB

No copayment required for basic or standard plans. 99% of consumers choose plans with no copay.

WIRELINE

California *Wireline* LifeLine Services*		
Plan	California Support Amount	Federal Support Amount
Standard (Voice only)*	$18.23	$5.25
Bundled (Voice and Internet Bundle)	$16.23	$9.25

Copayments for wireline voice service range from $5 - $10.

The CPUC is considering if and how, broadband[19] should be subsidized for low-income residents under the LifeLine program. Currently, the state legislature is introducing multiple new initiatives to improve broadband affordability. The California LifeLine program recognizes that ensuring broadband affordability is potentially within the scope of the Moore Act and has worked with the State Department of Finance (DOF) to add subsidies for broadband.

The major new federal broadband affordability initiatives are the Emergency Broadband Benefit[20] (EBB) and the Affordable Connectivity Program (ACP). EBB was a temporary program launched in May 2021, which provided $50/month in discounts to eligible households that opt in. The combination of LifeLine and EBB funding provided enough money for some Service Providers to offer plans with features like unlimited international calling, unlimited data, and hotspot functionalities. All federal Lifeline customers were categorically eligible for EBB, and LifeLine customers could combine EBB and LifeLine benefits. EBB transitioned to the ACP starting December 31, 2021, which provides $30/month instead of $50/month and is permanent instead of temporary.

The CPUC's Communications Division also launched a new branch in 2021 dedicated to broadband, using funding from the $6 billion broadband infrastructure package approved by the Governor and Legislature in July 2021.[21] The Broadband Regional Initiatives branch will work on the development of a state-owned, middle-mile broadband network overseen by the California Department of Technology. The California Advanced Services Fund has received new funding to make last-mile broadband connections. As stewards of the LifeLine fund, the CPUC Communications Division intends to learn from these new state and federal initiatives aimed at improving the affordability of broadband for Californians, and to subsequently evaluate what the remaining broadband affordability needs are before launching a new LifeLine subsidy for broadband.

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19   Broadband is the transmission of wide bandwidth data over a high-speed internet connection.
20   *https://www.fcc.gov/broadbandbenefit*
21   Senate Bill (SB) 156 Communications-Broadband 2021-2022: *https://leginfo.legislature.ca.gov/faces/billTextClient.xhtml?bill_id=202120220SB156*

II. LIFELINE PROGRAM REACH

The estimates for anticipated annual LifeLine program customer enrollment are currently based on the DOF estimates of the number of households with incomes less than 200 percent of the FPL, which is also the eligibility threshold for the CalFresh program. CPUC currently creates an estimate based on parameters outlined by its control agencies[22] through the twice-per-year estimated caseload projections (ECP). CPUC then coordinates with its control agencies on caseload projections. The LAO report identified the program enrollment estimating process as an important factor to be assessed by CPUC[23]. Notwithstanding that concern by LAO, it is important to note that to effectively address this factor will require the involvement of not only CPUC but also CPUC's control agencies to achieve an effective resolution of existing challenges.

Similarly, input from various stakeholders identified estimating accuracy as a concern. Continuous changes in state legislation result in programmatic changes to LifeLine which in turn, complicate forecasting based upon historical enrollment data. Furthermore, when programmatic changes occur, immediate and significant enrollment impacts can often be observed.

LifeLine enrollments in January 2018 were almost 1,775,000 and fell to about 1,535,000 in January 2020 [see Figure 3 below]. However, the impacts of COVID-based policy decisions associated with LifeLine are illustrated by the steady increase in enrollments starting in March 2020, where customers who previously may not have renewed their enrollment, remained in the program by default even if they were not actively using their LifeLine telephone[24]. As a result, there were a total of 2,029,906 households enrolled in LifeLine in April 2021. In May 2021, inactive customers were removed from the program and the program enrollment dropped to 37 percent, with the majority of the disenrollment being *wireless* customers (656,381).

Wireline enrollments have been steadily decreasing over the duration of the program, with a 52 percent reduction in *wireline* enrollments in the last five years (from 502,403 *wireline* customers in January 2017 to 239,380 in July 2021)[25]. Many of the policy changes during this period were focused on improving *wireless* enrollments, rather than retaining *wireline* enrollments.

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22   Control agencies refer to the California Department of Finance and the California Department of Technology.

23   2019. A Review of the LifeLine Budget Estimates and Enrollment Process. Legislative Analyst's Office. *https://lao.ca.gov/Publications/Report/3995*

24   Lifeline and Link Up Reform and Modernization (WC Docket No. 11-42), Order, DA 21-1191, (WCB September 22,2021), (Ninth Lifeline Waiver Order) extending prior waivers through December 31, 2021. *https://www.ecfr.gov/cgi-bin/text-idx?SID=bbdd70e7c08641479f8f46f05deba4cb&mc=true&node=se47.3.54_1405&rgn=div8 https://www.fcc.gov/document/wcb-extends-prior-covid-lifeline-program-waivers-dec-31-2021*

25   Dataset provided by CPUC on September 16, 2021

Figure 1. Monthly LifeLine Wireline and Wireless Enrollments, January 2018 to July 2021

Monthly LifeLine Subscription | January 2018 to July 2021
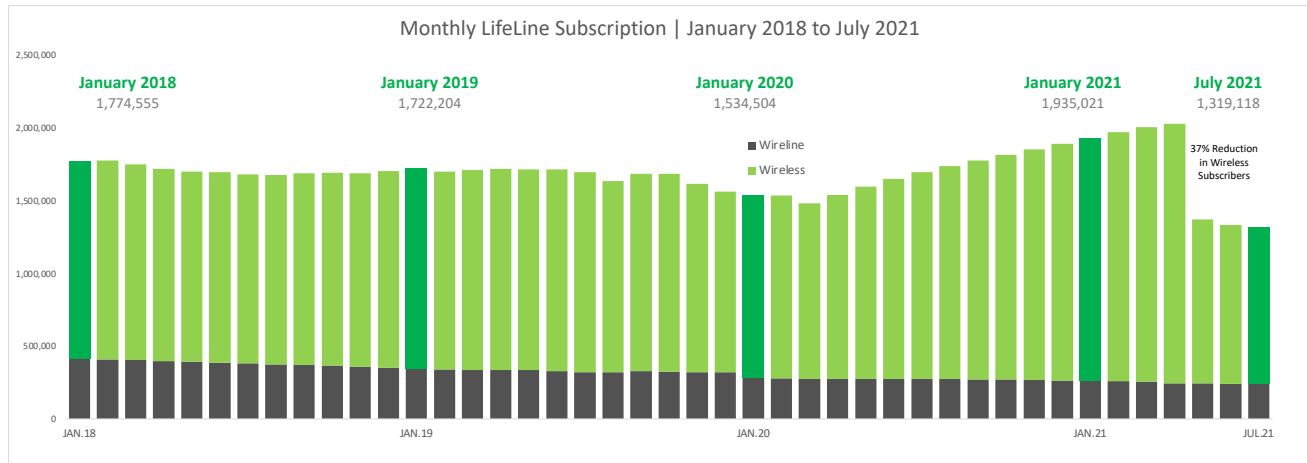
Participation Trends in Low-Income Benefit Program Enrollments by Household Characteristics

To provide context for the subsequent discussions in this Section, it is beneficial to consider the characteristics of eligible low-income households who participate in benefits programs nationally, as they relate to LifeLine enrollment rates (including the characteristics of those who do not participate despite being eligible). Table 4 below summarizes studies examining how household characteristics relate to program enrollment. It is important to note that these differences are of varying magnitudes. For example, ethnicity and gender are not as significant as a household's aggregate age or education level in terms of how they have been shown to influence participation.[26]

Table 4. Literature Review Summary about the Likelihood of Participating in Public Benefit Programs based upon Household Characteristics

Household Characteristic	Participation Trends with Public Benefit Enrollment
Age	Younger households are more likely to participate. [b, c]
Gender	Female-headed households are more likely to participate. [b]
Family Structure	Households with single parenthood status are more likely to participate. [c]
Number of Children	Higher number of children is related to higher enrollment rates. [c]
Social Stigma	Less significant effect on LifeLine than other public benefit programs, but still potentially decreases enrollment through negative self-image and/or belief that LifeLine plans are less desirable than standard phone plans. [a, b, c]
Education	Eligible households with higher levels of education have higher enrollment rates in Lifeline. [b] [27]
Race/Ethnicity	White households have lower enrollment rates than racial/ethnic groups. [b]
Other Assistance	Households enrolled in other government benefit programs have higher enrollment rates. [b]
Urban/Rural	Rural and suburban households are less likely to participate than their urban counterparts. [b, c]
Economic Factors	Enrollment rates tend to rise during times of per capita high poverty, unemployment, and economic recession. [b]

26   (a) Burton, Mark, Jeffrey Macher, and John W. Mayo. 2007. "Understanding Enrollment in Social Programs: Why Don't Households Pick up the Lifeline?" The B.E. Journal of Economic Analysis & Policy 7(57).
(b) Jayakar, Krishna, and Eun-A Park. 2019. "Reforming the lifeline program: Regulatory federalism in action?" Telecommunications Policy 43:67-75.
(c) Hauge, Janice A., Mark A. Jamison, and R. Todd Jewell. 2007. "Enrollment in Social Programs by Consumers and Companies: A Nationwide Analysis of Enrollment Rates for Telephone Lifeline Programs." Public Finance Review 35(5):606-25.

27   Jayakar et. al (2019) states: Whereas higher education reduces the size of the eligible population by contributing to higher incomes, it also increases the participation rate among the eligible population by increasing self-efficacy and access to information.

Demographics of California LifeLine Statewide Survey Respondents

While the LifeLine program collects only limited demographic information about customer households, a statewide survey of California Lifeline customers was administered as part of this Evaluation. 4,220 current *wireless* customers and 336 current *wireline* customers participated in the survey. These survey respondents can be used as a broad description of customers, however the responses summarized below do not account for response biases (e.g., some groups are more likely to respond to surveys than other groups).

> A statewide survey of LifeLine customers revealed the demographic profile of the average *wireless* customer is considerably different than the *wireline* customer.

A key finding from the statewide survey is that the profile of the *wireless* customer household is on average, considerably different than the *wireline* customer's (see Figure 2 below). Comparatively, *wireless* households are younger, larger, more diverse, and more transient than their *wireline* counterparts. Examples include the following:

Age | *Wireless* respondents are on average 10 years younger than the *wireline* counterparts (55 years vs. 65 years) with 56 percent of the *wireline* respondents being 65 years or older.

Race/Ethnicity | Overall, *wireless* respondents are more diverse than the *wireline* counterparts, with 53 percent of *wireline* respondents identifying as white.

Household Size | *Wireless* respondents came from households that were on average, larger than the *wireline* respondents.

Length at Current Residences | *Wireless* respondents are more mobile, with 27 percent living at their current residence less than two years compared to six percent of *wireline* respondents. Likewise, six percent of *wireless* respondents reported not having a permanent place to live. Seventy one percent of *wireline* users have lived at their current residence more than 10 years.

Other Communication Methods | Consistent with the differences in mobility between users, 48 percent of *wireless* users receive postal mail somewhere other than their current residence. Regular use of email is prevalent among both groups of customers, with more *wireless* respondents reporting regular e-mail use (78 percent) as compared to *wireline* respondents (48 percent). Finally, a greater number of *wireless* users (36 percent) are lacking paid internet at home, compared to *wireline* users (30 percent).

Demographics of Statewide LifeLine Survey Respondents

■ Wireline ■ Wireless

RESPONDENT AGE

Age	Wireline	Wireless
18-34 years	5%	9%
35-49 years	11%	23%
50-64 years	28%	45%
65+ years	56%	23%

RACE & ETHNICITY

	Wireline	Wireless
White	53%	47%
Black or AA	6%	8%
Latino/Hispanic	21%	21%
Asian, Nat. Hawaiian /Pac. Is.	4%	11%
Multi and other	9%	5%
missing/refused	7%	8%

HOUSEHOLD SIZE

	Wireline	Wireless
1 person	51%	44%
2 people	25%	21%
3 people	12%	14%
4+ people	12%	21%

YEARS AT CURRENT RESIDENCE

	Wireline	Wireless
Less than a year	2%	11%
1-2 years	4%	16%
3-5 years	8%	22%
6-10 years	15%	17%
More than 10 years	71%	29%
Without permanent place to live	0%	6%

HOUSEHOLD COMMUNICATION OPTIONS

	Wireline	Wireless
Uses non-residence mailing address	27%	48%
Regularly Uses Email	49%	78%
No paid internet service for home	30%	36%
Uses TYY	3%	2%

LifeLine Enrollment Rates in California

California's LifeLine enrollment is comparatively greater than the national Lifeline average, however, the estimate also demonstrates that LifeLine currently only enrolls a third of eligible households. California's LifeLine enrollment is comparatively greater than the national Lifeline average, however, the estimate also demonstrates that LifeLine currently only enrolls a third of eligible households.

While the total number of LifeLine enrollments is important in terms of budgetary projections, the rate of enrollments compared to eligible households is a better indicator of how well LifeLine is meeting its policy goals. The estimated July 2021 national Lifeline enrollment rate[28] provided by the National Lifeline TPA is 19 percent of the eligible households in the country, with California's enrollment rate of 34 percent, the third highest among all the states. It is presumed that a contributing factor to California's comparatively higher enrollment rate compared to other states is the amount of additional subsidy provided to California customers. Because the Universal Service Administrative Company (USAC), the national TPA of the Lifeline program in 47 states and Puerto Rico, does not collect information on the amount of additional Lifeline subsidy that may be provided by other states, additional comparison cannot be made.

While these statistics show that California's enrollment is comparatively greater than the national Lifeline average, the estimates also demonstrate that LifeLine currently enrolls a third of eligible households. While direct comparisons cannot be made to enrollment rates for LifeLine versus other California benefit programs due to differences in programmatic budgets, staffing, and implementation, some general information offers insights. When compared to enrollment rates of other benefit programs in the state, LifeLine enrollment rates remain low. For example, the CalFresh program via their "Enrollment Rate Index" estimates the proportion of eligible individuals receiving benefits reached 71 percent of the eligible individuals in 2018.[29] Comparatively higher enrollment rates are also seen in another low-income utility program, the California Alternate Rates for Energy (CARE). Like LifeLine, the CARE program provides subsidies (gas and electric), however CARE served 90 percent of eligible households in 2018.[30] Reasons for these differences in enrollment rates between state benefit programs are explored later in the report when considering recommendations for increasing LifeLine enrollment.

LifeLine enrollment data does not include critical demographic factors about households that would allow CPUC to benchmark its programmatic reach and identify or direct targeted outreach to eligible populations.

Though the LifeLine enrollment rate of eligible households is a key indicator to measuring how well the program is achieving its policy goals for the state, there remain challenges to fully assess the programs' reach to eligible households. Data collected in LifeLine application forms does not include critical demographic factors about households that could allow CPUC to benchmark its programmatic reach and identify or direct targeted outreach to eligible populations. Currently, LifeLine applications ask for income eligibility data only (i.e., household income or eligible program enrollment). Applications do not collect information on key demographic information such as: race and ethnicity, gender, household size, etc. that could be used to further assess the types of households the program is serving and those that are choosing

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28 USAC estimates are based on a methodology using multiple indicators from the American Community Survey to estimate the total eligible population, which differs from the CPUC use household estimates that are under 150% FPL, produced by the California DOF. (Universal Service Administrative Company, 2021) https://www.usac.org/lifeline/resources/program-data/#Enrollment

29 Public Policy Institute of California (PPIC). 2020. "The CalFresh Food Assistance Program." Retrieved from: https://www.ppic.org/publication/the-calfresh-food-assistance-program/

30 Dynamics, Opinion. 2019. "2019 California Low-Income Needs Assessment. Final Report: Summary of Key Findings." Portland

not to enroll and/or are not aware of the program. Further, enrollments are reported at the scale of the entire state and do not provide details in terms of regions or levels of use in urban versus rural contexts. As a point of comparison, other state public benefits programs regularly collect data and regional and sub-regional scales. A review of available demographic data collected by eight state public benefits programs is provided in Appendix D.

Total enrollment numbers are not disaggregated in LifeLine TPA reports between "new" enrollments versus "transfers" of existing customers. Review of raw data reports reflect a significant amount of enrollment 'churn'31, specifically in the *wireless* program. For example, *wireless* program customers are transferring between *wireless* Service Providers at higher rates than *wireline* customers, and rather than renewing enrollment, existing or past *wireless* customers are submitting new enrollment paperwork. For example, when looking at the monthly application data provided by the TPA, the data reflects a 2:1 ratio where on average, two *wireless* customers transferred into a *wireless* Service Provider's LifeLine program per month for every new subscriber approved.[32]

Data identifying what proportion of a Service Provider's customer base is enrolled in LifeLine plans versus standard phone plans was not available.

Due to these factors, it is difficult to forecast overall aggregated enrollment numbers, as well as to evaluate with specificity, the extent to which the program is benefiting the state's eligible low-income households it was created to serve.

Measuring the Reach of the LifeLine Program

This Evaluation conducted a "point-in-time" analysis of active LifeLine customers in July 2021. This analysis identified a total of 1,288,917 LifeLine customers with 81 percent representing *wireless* customers (1,048,567) and *wireline* customers making up 19 percent of the enrollment (240,350) statewide. The list of customers was provided by the TPA as a complete record of unique households (identified by unique telephone numbers) and serves as a 'snap-shot' of LifeLine enrollment.33 This analysis differs from the monthly reported numbers from the TPA reports, which show the aggregated results of pro-rated monthly enrollment, transfers, and disenrollment activity.

Count of LifeLine Customers by Region. The publicly reported information describing the LifeLine program has been aggregated at the state level. Given the ethnic, language, and geographic diversity of California, analyses in this Evaluation were conducted at a regional level to better identify and understand factors influencing LifeLine enrollment. A ten-region breakdown as defined by the United States Census[34] was determined the most appropriate approach to ensure that regional groupings are similar in terms of population, social services, and CBOs, as well as Service Provider coverage.

In examining the distribution of the ~1.3 million LifeLine customers by their region of residence, enrollments overall reflect the population density of the state. Region 8 (Los Angeles County) had the greatest number of customers at 406,435 or 32 percent of all LifeLine customers in California, compared to Region 2 (North Coast) with 21,767 or two percent of the state's customers. *Wireless* plans made up 80 to 88 percent of the LifeLine customers across most regions, with the Central Valley of the state (Regions 4, 6 and 7) showing the highest proportion of *wireless* enrollments. Region 2 (North Coast) was notable in that only 63 percent of its customers were *wireless*, with 37 percent participating through *wireline* plans.

31   Churn is the rate at which customers stop doing business with an entity. It is commonly expressed as the percentage of telephone service subscribers who discontinue their subscriptions within a given period.

32   Analysis of CA LifeLine Monthly Reports (July 2020 to June 2021) generated by Maximus.

33   Point in Time Analysis of LifeLine customer list from July 2021, provided by Maximus.

34   https://census.ca.gov/regions/

Table 5. Total Number of LifeLine Customers by Region | Point in Time Analysis, July 2021

Regions	# of LifeLine Customers	Percent of State Enrollment
California Total	1,288,917	100%
Region 1	Superior California	106,250	8%
Region 2	North Coast	21,767	2%
Region 3	San Francisco Bay Area	155,165	12%
Region 4	Northern San Joaquin Valley	84,505	7%
Region 5	Central Coast	54,005	4%
Region 6	Southern San Joaquin Valley	125760	10%
Region 7	Inland Empire	156,517	12%
Region 8	Los Angeles County	406,437	32%
Region 9	Orange County	75,044	6%
Region 10	San Diego - Imperial County	103,472	8%

Figure 3. Percent of Total LifeLine Customers Enrolled by Region | Point in Time Analysis, July 2021

Percentage of State LifeLine Customers by Region
July 2021

Region	Percent
Superior California	Region 1	8%
North Coast	Region 2	2%
San Francisco Bay Area	Region 3	12%
Northern San Joaquin Valley	Region 4	7%
Central Coast	Region 5	4%
Southern San Joaquin Valley	Region 6	10%
Inland Empire	Region 7	12%
Los Angeles County	Region 8	32%
Orange County	Region 9	6%
San Diego - Imperial County	Region 10	8%
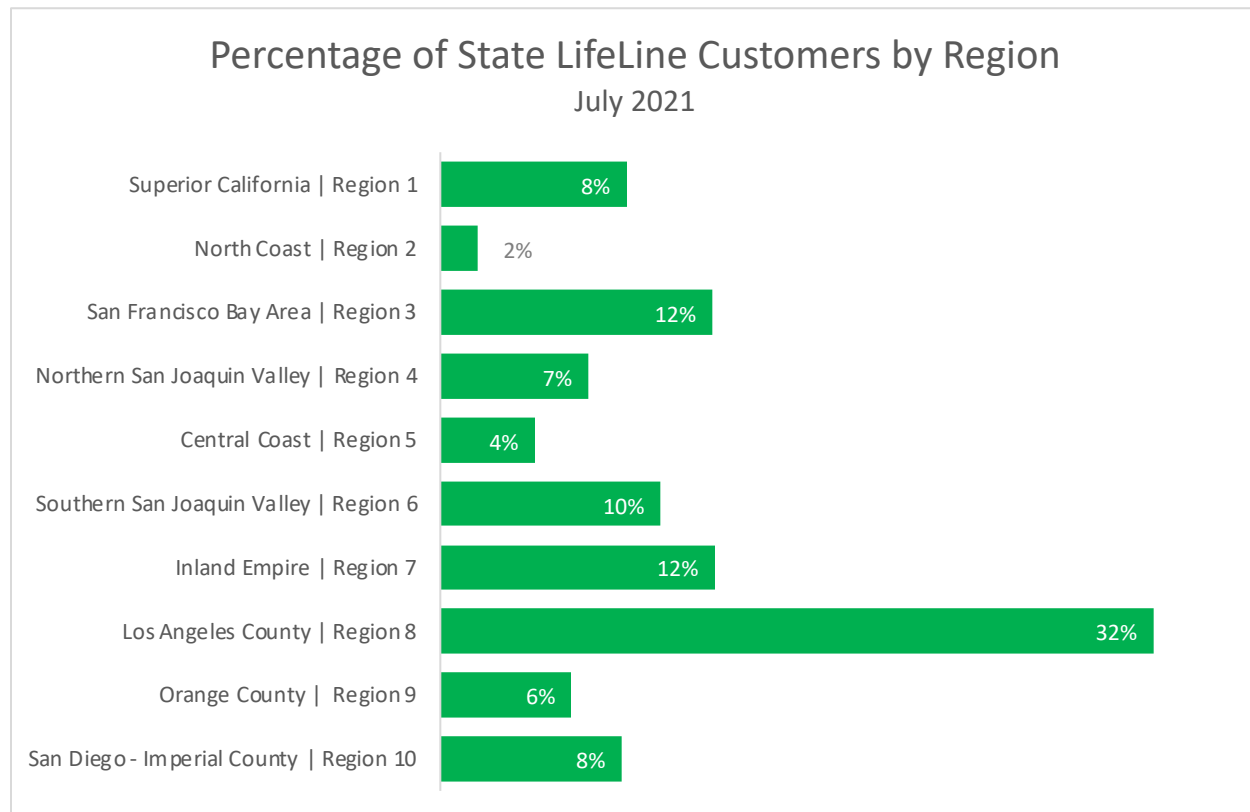
Figure 4. Total Number of LifeLine Customers by Region. Point in Time Analysis of July 2021.

LifeLine Enrollment by Region
July 2021

Region 2
21,767

Region 1
106,250

Region 3
155,165

Region 4
84,505

Region 5
54,005

Region 6
125,760

Region 8
406,437

Region 7
156,517

Region 9
75,044

Region 10
103,472

Enrolled
- 21,767-54,005
- 75,044-106,250
- 125,760-156,517
- 406437
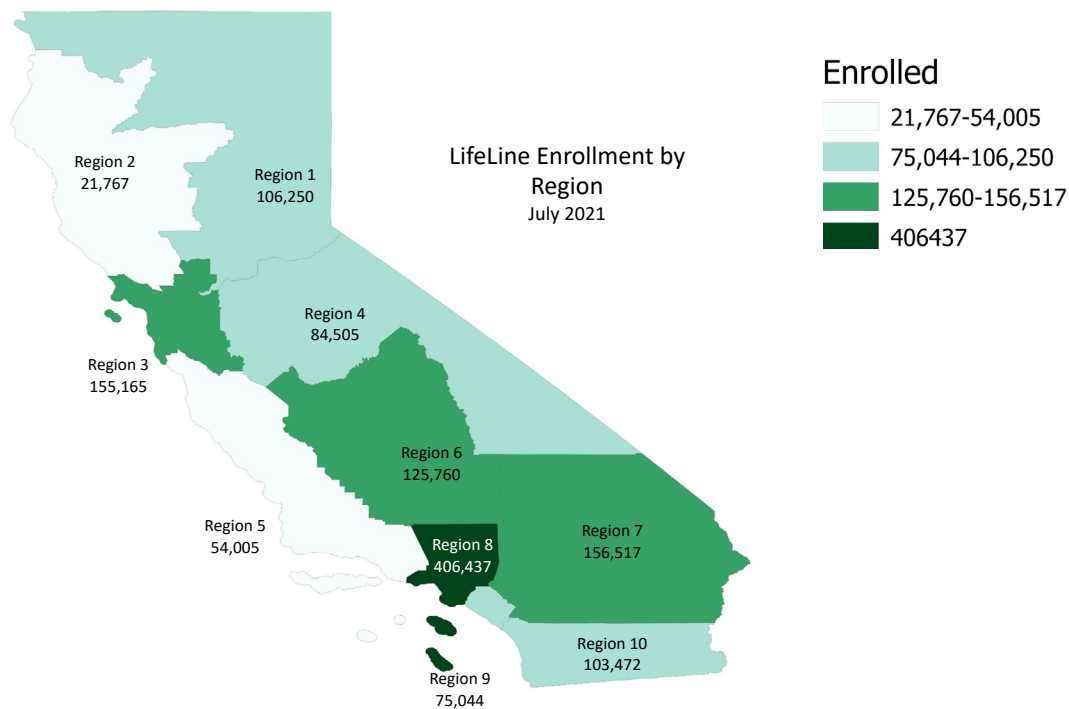
Figure 5. Percent of Total Number of LifeLine Customers by Region and Type of Phone Plan. Point in Time Analysis of July 2021.

LifeLine Customers by Region and Type of Phone Plan
July 2021

Region	Wireless	Wireline
Superior California | Region 1	81%	19%
North Coast | Region 2	63%	37%
San Francisco Bay Area | Region 3	72%	28%
Northern San Joaquin Valley | Region 4	85%	15%
Central Coast | Region 5	80%	20%
Southern San Joaquin Valley | Region 6	88%	12%
Inland Empire | Region 7	88%	12%
Los Angeles County | Region 8	80%	20%
Orange County | Region 9	81%	19%
San Diego - Imperial County | Region 10	83%	17%

0   50000   100000   150000   200000   250000   300000   350000   400000   450000

■ Wireless ■ Wireline

Program Enrollment Rates by Eligible Households

Program enrollment rates (presented below) are estimated by comparing the total number of eligible households to the total number of customers enrolled in LifeLine in July 2021. Estimates used for the total number of eligible households by household characteristics are dependent on the available data. As a result, these calculated enrollment rates should only be used to contextualize LifeLine enrollment and should not be considered precise estimates.

Customers' households were categorized among the ten Census regions in California based upon resident zip codes. Estimates for the number of eligible households by county were derived from the Public Use Microdata Sample (PUMS) for the regions within California.[35] Other demographic data regarding languages other than English spoken in households, tribal population data, and other descriptive population data were collected through existing data sources to serve as a point of comparison for the reach of LifeLine serving specific populations in California.

Regional Enrollment Rates of Eligible Households. Statewide, the number of households subscribing to LifeLine in July 2021 represented 34 percent of the total number of eligible households in California (as compared to the estimates produced above by the national Lifeline TPA using a different methodology). Regional LifeLine enrollment rates were estimated using the total number of households with incomes at or below 150 percent of the FPL, and/or where a member of the household was a participant in at least one of the following: 1) Medicare (Medical); 2) Foods Stamps (CalFresh); 3) Supplementary Security Income; 4) Public Assistance Income. LifeLine enrollment rates varied significantly across regions. For example, the North Coast (Region 2) has an enrollment rate of 19 percent compared to Northern San Joaquin (Region 4) with 39 percent of their eligible households enrolled.

Table 6. Eligible Households Enrolled in LifeLine by Region | Point in Time Analysis, July 2021

CALIFORNIA REGIONS	Total Eligible Households in Region	LifeLine Enrollment Rate
California Total	**3,785,766**	**34%**
Region 1 | Superior California	339,381	31%
Region 2 | North Coast	111,910	19%
Region 3 | San Francisco Bay Area	496,903	31%
Region 4 | Northern San Joaquin Valley	215,700	39%
Region 5 | Central Coast	197,257	27%
Region 6 | Southern San Joaquin Valley	338,029	37%
Region 7 | Inland Empire	443,381	35%
Region 8 | Los Angeles County	110,8172	37%
Region 9 | Orange County	234,464	34%
Region 10 | San Diego - Imperial County	300,569	32%

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35   Eligible household counts (those households with incomes less than or equal to 150% of the Federal Poverty Line) are based upon the 2019 American Community Survey 1-year estimates.

LifeLine Household Participation Rate by Region
July 2021

Participation Rate
- 20%
- 27%-32%
- 34%-35%
- 36%-39%

Region 2 — 19%
Region 1 — 31%
Region 3 — 31%
Region 4 — 39%
Region 6 — 37%
Region 5 — 27%
Region 7 — 35%
Region 8 — 37%
Region 9 — 32%
Region 10 — 34%

When reviewing a regions' proportion of the total number of eligible households in the state, the San Joaquin Valley (Regions 4 and 6) and Los Angeles County represent proportionately greater reach of the LifeLine program than the coastal regions. However, it is not clear if this is due to factors related to Service Provider coverage, Service Provider outreach, or customer satisfaction. Additional details related to these factors are discussed in the *Phone Service Providers* and *Market Competition and Customer Experience* Sections of this report.

Enrollment Rates for Limited-English Households. In July 2021, seven percent of all LifeLine customers (91,947 households) enrolled utilized a language other than English. However, 25 percent of *wireline* customers were non-English compared to only three percent of *wireless* customers. Spanish was the most common non-English language for customers with 65 percent of the non-English enrollments. Chinese (21 percent) is the second most common language for non-English LifeLine customers, followed by Vietnamese (8 percent). Korean, Tagalog, and Japanese make up the remaining non-English enrollments.

Table 7. Lifeline Customers Enrolled in a Language Other than English, Inclusive of both Wireline and Wireless Enrollments | Point in Time Analysis, July 2021

Language	Non-English Customers Enrolled	Percent of all Non-English LifeLine Customers
All Non-English Customers	**91,947**	**100%**
Spanish	60,167	65%
Chinese	19,539	21%
Vietnamese	7,614	8%
Korean	3,574	4%
Tagalog	707	1%
Japanese	346	<1%

Only 18 percent of limited-English speaking households in California who are income eligible participate in the LifeLine program.

Considering the reach of the LifeLine program, there are approximately 620,489 limited-English speaking households with incomes equal or less than 150 percent of the FPL in the state.[36] Using the July 2021 non-English enrollment numbers, it is estimated that the LifeLine enrollment rate for limited-English speaking households is 15 percent of the eligible population in the state.

However, the enrollment rates for limited-English speaking households vary significantly between regions. For instance, the enrollment rate for the Central Coast region was 24 percent of eligible limited-English households, compared to six percent for both the Superior California and Southern San Joaquin Valley regions.

Table 8. LifeLine Enrollment Rate of Limited-English Households by Region | Point in Time Analysis, July 2021

	Non-English LifeLine Customers	Enrollment Rate of Limited-English Households
**Total State	California**	**91,947**	**18%**
Region 1	Superior California	1,843	7%
Region 2	North Coast	686	13%
Region 3	San Francisco Bay Area	19,239	22%
Region 4	Northern San Joaquin Valley	2,458	9%
Region 5	Central Coast	5,995	24%
Region 6	Southern San Joaquin Valley	4,545	7%
Region 7	Inland Empire	5,541	11%
Region 8	Los Angeles County	34,418	14%
Region 9	Orange County	6,975	17%
Region 10	San Diego - Imperial County	10,247	20%

36 A "limited-English speaking household" is one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." In other words, all members 14 years old and over have at least some difficulties with English. *https://www.census.gov/topics/population/language-use/about/faqs.html*

Participation Rate
- 7%-9%
- 11%-14%
- 17%
- 21%-24%

LifeLine Participation of Limited-English Households
July 2021

Region 2
13%

Region 1
7%

Region 3
22%

Region 4
9%

Region 6
7%

Region 5
24%

Region 8
14%

Region 7
11%

Region 9
20%

Region 10
14%
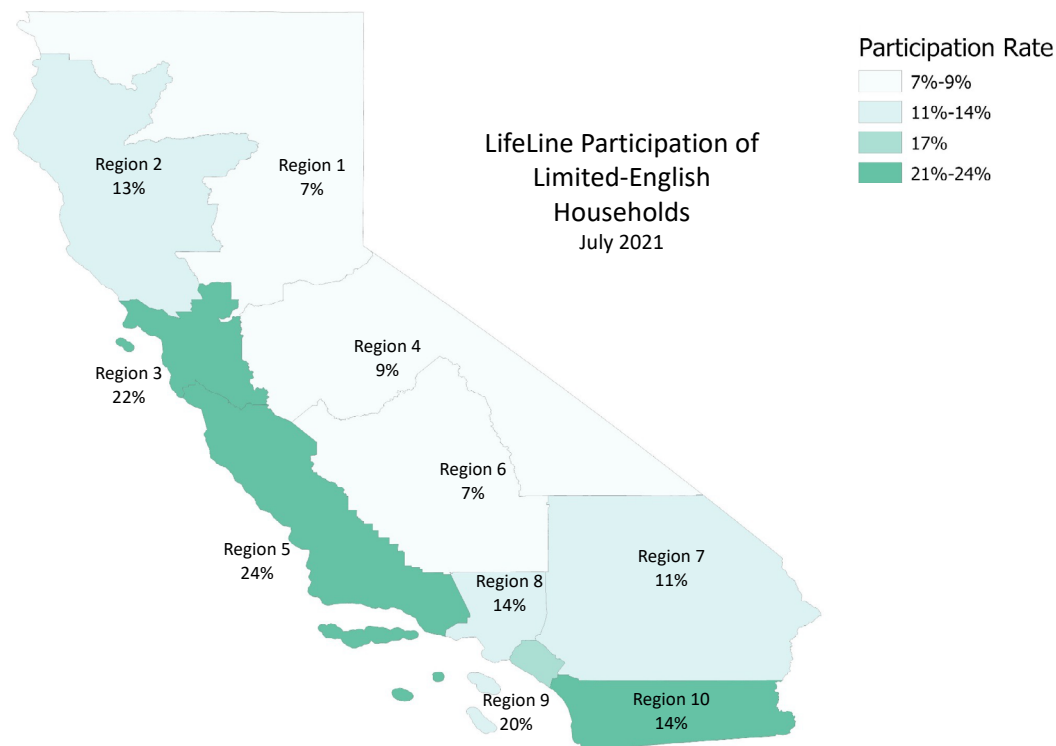
Enrollment Rates Among Tribal Populations

A total of 375 tribal households were enrolled in the LifeLine program in July 2021. Of these households, 80 percent were enrolled in LifeLine with a *wireless* plan. Thirty six percent of the tribal customers were residents of the Inland Empire (Region 7) with the lowest enrollments being in the more urban regions of San Francisco Bay Area (Region 3) and Orange County (Region 9).

Table 9. Tribal Household Enrollments by Region | Point in Time Analysis, July 2021

	Wireless Customers	Wireline Customers	TOTAL	% of State Tribal Customers
California Total	**299**	**76**	**375**	**100%**
Region 1	Superior California	54	22	73	20%
Region 2	North Coast	39	5	44	12%
Region 3	San Francisco Bay Area	3	-	3	1%
Region 4	Northern San Joaquin Valley	17	27	44	12%
Region 6	Southern San Joaquin Valley	18	17	35	19%
Region 7	Inland Empire	131	4	135	36%
Region 8	Los Angeles County	6	-	6	2%
Region 9	Orange County	1	-	1	<1%
Region 10	San Diego - Imperial County	30	1	31	8%

As of December 2021, there were 16 Service Providers in the state eligible to provide tribal LifeLine service, however three of these Service Providers did not have any tribal customers at this time.

Data from the American Community Survey's (ACS) "My Tribal Area" tool was used to estimate the number of households on tribal lands.[37] A total of 30,312 occupied households were identified, resulting in a LifeLine enrollment rate of one percent of the eligible tribal households. The disproportionate enrollment of eligible tribal households in the LifeLine program is significant enough to warrant its own discussion in the *Customer Experience* Section of this report.

Enrollment Rates Among Teletypewriter Users

In July 2021, there were 270 LifeLine enrollments for teletypewriter (TTY) *wireline* users. In reviewing TTY enrollments by region, 50 percent are in Los Angeles County, and 26 percent are in the Inland Empire (see Table 10 below). The North Coast is the only region where there are no TYY users enrolled in LifeLine.

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37   *https://www.census.gov/tribal/?st=06&aianihh=0020* Data from this tool was derived from the 2015-2019 ACS dataset. For almost every tribal area, select demographics were reported including the number of total households on the land and the number of occupied households. The sum of all households and all occupied households on tribal lands was calculated by aggregating the reported estimates for each individual tribal area. There are several caveats to the total number of households and total number of occupied households. First, certain reservations or tribal communities did not provide complete data sets for the ACS and therefore households within said reservations or communities could not be included in the estimate. Second, certain reservations or communities straddled state lines. Finally, household income information was not available and so all households are assumed eligible.

Table 10. TTY LifeLine Enrollments by Region | Point in Time Analysis, July 2021

	TTY LifeLine Customers	Percent of State TTY LifeLine Enrollments
California Total	**270**	**100%**
Region 1	Superior California	2	1%
Region 2	North Coast	2	1%
Region 3	San Francisco Bay Area	3	1%
Region 4	Northern San Joaquin Valley	2	1%
Region 5	Central Coast	17	6%
Region 6	Southern San Joaquin Valley	6	2%
Region 7	Inland Empire	69	26%
Region 8	Los Angeles County	134	50%
Region 9	Orange County	28	10%
Region 10	San Diego - Imperial County	7	3%

Multiple technologies have replaced the communication functions of the traditional TTY, including customer service 'online chat' options on websites, *wireless* text messaging, smartphone hearing aid compatibility, automatic captioning, and mobile and Internet Protocol (IP) relay. In March 2022, Deaf and Disabled Telecommunications Program (DDTP) at CPUC reported that 17,900 TTYs were distributed through their California Telephone Access Program.[38] This number does not reflect the total number of households that are using a TTY, only those that obtained the devise through the DDTP program. In the absence of any reliable information about the total number of TTYs in use, we broadly estimate that the enrollment rate for LifeLine TTY users is 1.5 percent based upon the DDTP estimate.

At-Market Phone Services Purchased Outside of the LifeLine Program by Current Customers

The ultimate goal of the California LifeLine program is to ensure universal access to affordable phone services for low-income residents.[39] Enrollment rates in the program show that about two-thirds of the eligible households in the state are not benefiting from the program, with high levels of disparity among several high-need groups such as tribal members, TTY users and limited-English households. However, the low enrollment rates in the LifeLine program by eligible households does not **necessarily** mean these households' residents do not have any access to phone services. The statewide survey results, in addition to focus group responses, showed trends in at-market phone services purchased for those **household**s participating in LifeLine.

Most current LifeLine customers surveyed reported that they have a second personal use cell phone in addition to their LifeLine device due to the service and device quality of their LifeLine phone.

For current LifeLine customers, 44 percent reported in the statewide survey that LifeLine is the only phone service in their household; meaning 56 percent of current LifeLine customers have access to additional phone services within their households that they or someone else purchase (see Figure 8 below). A significant proportion, 43 percent, of LifeLine customers have at least one non-Lifeline *wireless* phone in their household and 12 percent have a non-Lifeline *wireline* phone. As a point of comparison, 22 percent of those who are not enrolled in LifeLine reported no phone service in their households. Sixty-eight percent of the non-LifeLine respondents reported having *wireless* services and 13 percent *wireline*.

Figure 8. Non-Lifeline Phone Services in Households, Customers vs. Non-Customers | Statewide Survey, October 2021

Other* Phone Services in LifeLine Customer Households

Only LifeLine Service	44%
Other Wireless Service	43%
Other Wireline Service	12%
Other Phone Service	4%

Phone Services in Households Not Participating in LifeLine

Wireless Phone Service	68%
No Phone Service	22%
Wireline Phone Service	13%
Other Phone Service	5%
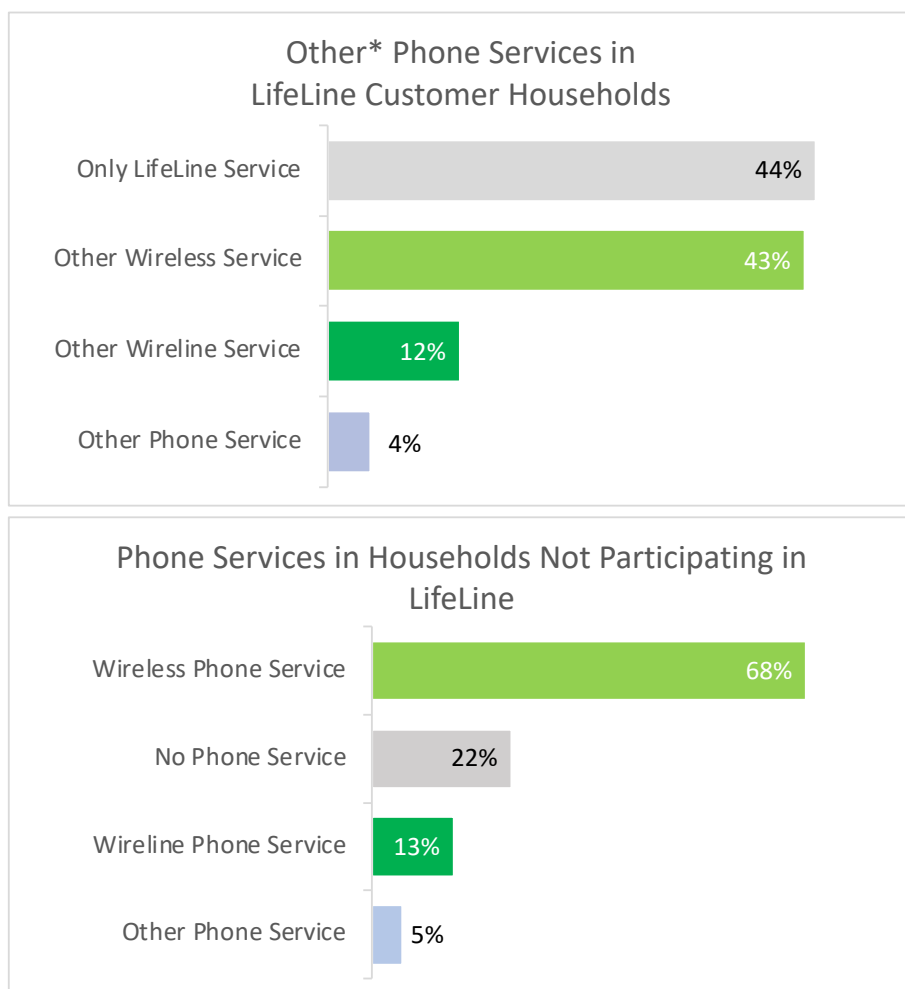
* "Other" refers to any non-LifeLine phone service. Charts total greater than 100% as some individuals reported having more than one "other" phone service in their household (e.g., the household has both a non-LifeLine wireline phone and a non-Life-Line wireless phone).

Comparing the differences between current LifeLine *wireless* and *wireline* customers (see Figure 9 below), 13 percent of *wireless* customers purchase *wireline* service, while 59 percent of *wireline* customers purchase *wireless* service.

Non-Lifeline Phone Services in LifeLine Customer Households
Wireline vs. Wireless Customers

- Wireline Customer
- Wireless Customer

Landline phone for the home
- 3%
- 13%

Wireless/cell phone for myself or someone in my household
- 59%
- 42%

0% 20% 40% 60% 80%
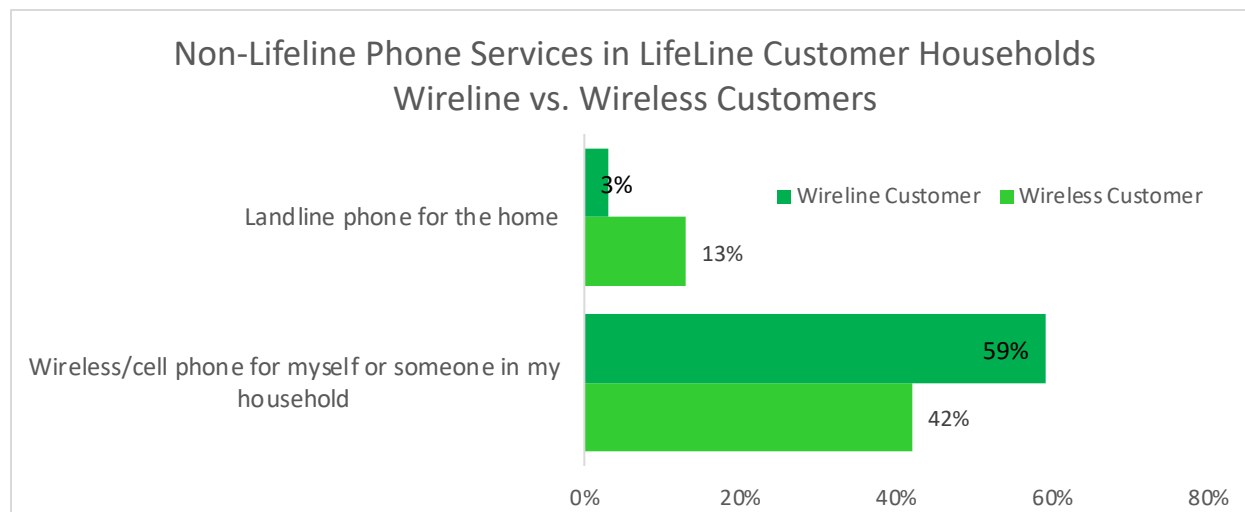
Focus group respondents confirmed this trend, with most currently enrolled customers reporting they have a second personal use cell phone in addition to their LifeLine device due to the device quality and service of their LifeLine phone. More detail is provided about this issue in the *Customer Experience* Section.

Wireless services are almost ubiquitous in current LifeLine customers households, with 96 percent reporting that they had at least one cellphone in their households (including both LifeLine and non-LifeLine services). See Figure 10 below. Further, 72 percent of the current customer households report that they have at least one cell phone per adult member (15 years or older).

Figure 10. Total Number of Cell Phones in Current LifeLine Households (Inclusive of both LifeLine and non-LifeLine phones) | Statewide Survey, October 2021

No cell phone in household — 4%
Less than one phone per adult (15 years +) — 25%
One cell phone per adult (15 years +) — 44%
More than one cell phone per adult (15 years +) — 28%
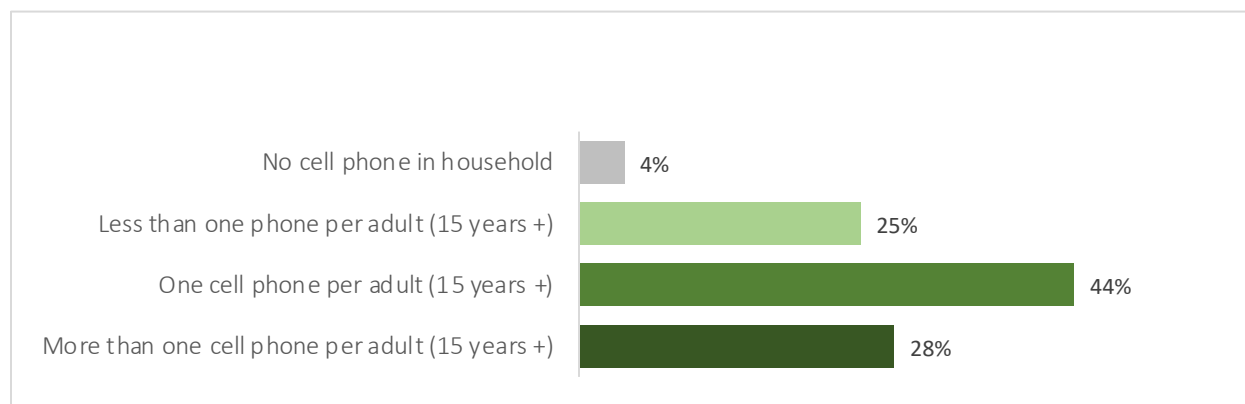
The primary use of non-LifeLine cellphones within customers' households differs slightly between *wireless* and *wireline* customers (see Figure 11 below). Seventy-two percent of *wireless* customers report that their non-LifeLine cell phones are used as personal phone line/contacts while 52 percent of *wireline* customers report using their non-LifeLine cell phones as a back-up or emergency phone. A significant proportion of non-LifeLine cell phones are also used to access the internet (45 percent for *wireless* and 33 percent for *wireline* customers).

Figure 11. Primary Uses of Non-LifeLine Wireless Services in Customers' Households | Statewide Survey, October 2021

Uses of Non-LifeLine Wireless Phones in Customers' Households

Use	Wireline	Wireless
Primary personal phone line/contact (phone, text)	44%	72%
To access the internet (with data)	33%	45%
Primary business/work phone line/contact phone	12%	24%
Use as a back-up/emergency phone	52%	19%
Don't know	2%	12%
Other	19%	6%
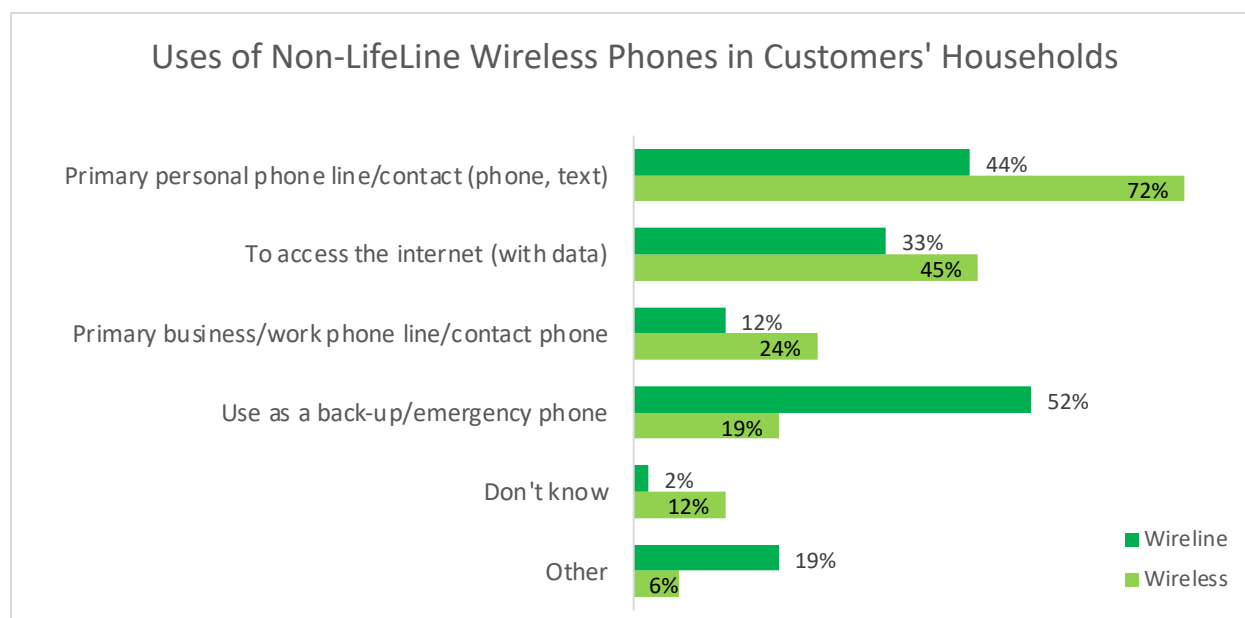
Similarly, smartphones are the device of choice for those cell phones in customer households used outside of the LifeLine program, with 79 percent of *wireless* and 98 percent of *wireline* customers having a non-LifeLine smart phone in their household. In addition, 35 percent of *wireline* customers have a smart phone they personally use, that they purchased outside of the LifeLine program, illustrating the reliance on smart phones even if they are not provided as a part of the LifeLine program.

Figure 12. Prevalence of Non-LifeLine Smartphones in Current Customer Households | Statewide Survey, October 2021

Current Customers' Use of Non-LifeLine Smartphones

	Wireline	Wireless
Customer personally uses a Non-LifeLine Smartphone	63%	35%
Household has at least one non-LifeLine Smartphone	98%	79%
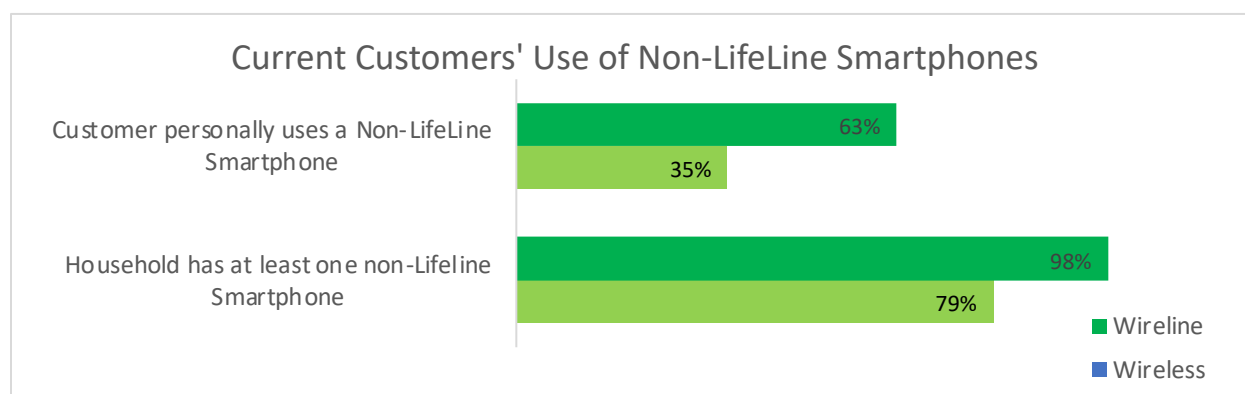
Reviewing the prevalence of at-market phone services and devices within LifeLine customer households suggests that the demand for *wireless* services is much greater than the program provides. These findings reflect the changing nature of telecommunications from that of a household utility to a personal communication device that is critical for numerous daily functions. It also raises questions about the relevancy of the mission of the LifeLine program to provide general phone access to low-income residents and the scope of need that is not being addressed for these citizens.

III. PROGRAM OPERATIONS & IMPLEMENTATION

This Section provides a description of how the LifeLine program is administered, and an overview of findings pertaining to the oversight and administration of the LifeLine program.

Overview of LifeLine Program Implementation

LifeLine is implemented through cooperation between four main entities:
- CPUC Commissioners as a decision-making body (Commission),
- Communications Division of the CPUC,
- CPUC's contracted TPA[40], and
- Telephone Service Providers.

The Communications Division also contracts with an additional Information Technology (IT) consultant to aid in the administration of the program. Along with their respective program activities, key evaluative measures employed by these entities are identified below.

The Commission establishes policy and programmatic parameters of LifeLine such as: minimum level of service for a telephone plan to be included in LifeLine, the rates of the discounted services that LifeLine customers pay, the criteria used to qualify to participate in LifeLine, and similar.

The Communications Division oversees an average annual LifeLine total program budget of more than $400 million, is responsible for the implementation of Commission decisions and the administration of the LifeLine program, provides oversight of the TPA, and establishes uniform guidelines and procedures for the implementation of LifeLine at the Service Provider level. The state operations of the LifeLine program constitute approximately eight percent of the total program budget or about $33 million annually.[41] The Communications Division also monitors and processes subsidy reimbursement requests from Service Providers.

Some Service Providers who offer *wireline* plans do so by statutory obligation as Carriers of Last Resort (COLR). COLR is the term used to describe a telephone corporation that is required to fulfill all reasonable requests for service within its service territory.[42] California has 22 COLRs. Of the 28 total LifeLine *wireline* Service Providers, nine are not COLR[43]. Service Providers who offer *wireless* may opt in as LifeLine Service Providers. Both *wireline* and *wireless* Service Providers who opt in are required to complete a one-time application to receive approval to offer LifeLine.

Service Providers receive subsidies that include state and federal dollars to offer discounted or no-cost LifeLine plans to customers. Service Providers are also reimbursed for service connection charges up to twice per year per customer enrollment[44]. A May 2021 CPUC Budget Change Proposal (BCP) shows the California LifeLine program requests $386,709,000 for local assistance funding to reimburse claims from participating Service Providers that offer discounted phone service to program participants[45].

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40   Maximus has been the contracted TPA from 2019 – 2021. Prior to Maximus, Conduent held this contract with CPUC. The contract for the TPA is up for renewal in 2022. Maximus can submit a bid via CPUC's competitive bid process for an opportunity sign a new contract with CPUC.

41   LifeLine Factsheet, CPUC, December 2020

42   https://codes.findlaw.com/ca/public-utilities-code/puc-sect-275-6.html

43   https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2019/oga-ab-1366-position-memo-20190624.pdf

44   The twice per year $39 connection fee reimbursement is associated with the customer and is implemented on a calendar year basis, from December 24 – December 23. For example, if a customer transfers service twice during this calendar year period, both Service Providers will receive the connection fee reimbursement. If the customer transfers a third time in this period, the Service Provider will not receive the connection fee.

45   https://esd.dof.ca.gov/Documents/bcp/2122/FY2122_ORG8660_BCP4815.pdf

The plans offered by Service Providers to LifeLine customers are a part of their regular services and coverage, and Service Providers are required to inform potential customers of the LifeLine plans via website or other promotional activities. Service Providers conduct outreach and advertising for these plans according to their own strategies, methods, and budget. CPUC requires the review and approval of marketing materials prior to public dissemination. Materials are required to be submitted for review to a dedicated Communications Division "marketing materials" email account. Based on the reported low volume of submissions, there is no certainty that all Service Providers are submitting all materials per the requirement. Furthermore, Communications Division has no enforcement mechanism available for failure of the Service Providers to comply.

A TPA is contracted by CPUC to manage the enrollment and renewal processes for LifeLine customers. This includes receiving inquiries from the participating Service Providers, processing mail/paper/electronic enrollment applications and renewals, hosting and managing online application and renewal processes, and providing a helpline for customer inquiries. The TPA also reviews and processes the eligibility of customers and communicates the certification of eligibility to Service Providers for customers to enroll in LifeLine plans. The Communications Division also collaborates with the TPA to develop program implementation guidelines related to any FCC and Commission decisions, and in many cases to implement them.

CPUC's contracts with the TPA are for three-year terms, with the ability for the TPA to apply for two, one-year extensions. The current TPA is in the first year of their extension, and their final extension commences in April 2022. They are eligible to reapply in an upcoming request for proposal (RFP) cycle. In calendar year 2021 (January – December), the TPA received $10,389,534accounting for 32 percent of the $32,683,000 for state operations funding to administer the program[46].

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46   TPA invoices to CPUC for services rendered from January through December 2021. Information provided via email correspondence from CPUC Communications Division to University on March 7, 2022.

Figure 13. Representation of the entities involved in the administration and implementation of the LifeLine program, and their relationships to one another.

California State Legislature
- Approves the LifeLine budget

FCC
- Makes policy decisions
- Authorizes Lifeline subsidies

LifeLine Staff & IT Consultant
- Review TPA activities, processes, proposed changes, and IT updates
- Advise the CPUC on TPA activities, proposed programmatic and IT changes

Program Funding

Direct/Influence CPUC decision making

California Public Utilities Commission
- Administer the FCC's Lifeline Program for California
- Administer LifeLine for state-funded subscribers
- Recommend the annual Program budget
- Approve Program policies and regulations
- Implement policy decisions
- Process Program subsidies for service providers
- Steward of the LifeLine Fund by combating Program waste, fraud, and/or abuse

Program Implementation

Program Oversight

Third Party Administrator
- Determines participant Program eligibility
- Operates the flow of information between participants, service providers and CPUC staff
- Processes enrollments and renewals
- Provides the CPUC Program data to support evaluation of subsidy claims
- Provides Program support to participants by phone, interactive voice response (IVR), mail, text, email, webchat and website
- Prevents Program waste, fraud and abuse
- Interacts with internal and external Program stakeholders
- Manages and enhances Program technological platform

Subsidy claims

Eligibility Verified

Comprehensive Program support

Apply for LifeLine

Program Funding

Advocacy

Service Providers
- Offer subsidized LifeLine service plans
- Collect eligibility documentation
- Support enrollment and renewal

Eligible Customers
- Submit enrollment and renewal forms
- Submit qualification proof for enrollment
- Receive LifeLine benefits

California Ratepayers
- California's LifeLine support comes from over $300 million/ year in California ratepayer funds

Consumer Advocates
- Advocates for economically vulnerable California residents
- Advances policy proposals to the CPUC

Advocacy

LifeLine Customer Qualification Avenues

The LifeLine subsidy is provided to qualified households (individuals who live together and share income and expenses), rather than to an individual. If two or more eligible parties share the same residence but are otherwise financially independent, all eligible parties can receive the subsidy. The subsidy can be applied to either a *wireline* or a *wireless* phone per household, but not both. The exception to one discounted phone per household is for TTY users who can have two subsidized LifeLine services. Between June 2020 and July 2021, four percent of LifeLine customer applications were rejected for having an existing subscription.[47]

The two qualification methods for the LifeLine program are income-based eligibility and program-based eligibility. Documentation of proof of eligibility is required for both methods during the application enrollment process. The full list of LifeLine qualifying programs is found in Appendix C.

Under income-based eligibility, a household may qualify for the state LifeLine subsidy if the household's total annual gross income is at or less than 150 percent of the FPL. To receive the federal Lifeline subsidy, gross income must be at or less than 135 percent of the FPL. As of October 31, 2021, 95 percent of California LifeLine customers receive both the federal and state subsidies[48].

Under program-based eligibility, a person may qualify for the subsidies if they or another person in their household is already enrolled in one or more of the eligible public-assistance programs.

Ninety-five percent of LifeLine customers qualify via program-based enrollments, with CalFresh (51 percent) and Medicaid/Medi-Cal (43 percent) representing almost all the program-based application eligibility. However, as defined by Communications Division staff, in the event eligible customers are identified as enrolled in more than one qualifying program, program administrators may select the "qualifying" program for application processing purposes. For this reason, it is important to caution against drawing specific conclusions based on the qualifying program percentages.

Table 11. Percentages of Eligibility Submission by Program-based or Income-based Qualifications.

Eligibility Method, by Submission Type (June 2020 - June 2021)[49]				
	ALL	**DAP*	622,201**	**MAIL	8,300**	**WEB	7,640**
SNAP/CalFresh	51%	51%	15%	26%
MediCal	43%	44%	33%	43%
Federal Income	3%	2%	19%	13%
State Income	2%	1%	15%	8%
SSI	1%	1%	14%	8%
Other Program	1%	1%	3%	3%

*DAP: Direct Application Process

*Some columns do not add up to 100% due to rounding.

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47 Analysis of TPA monthly reports, *B. Top Three Denial Codes for Applications and Renewals with detail by service provider,* June 2020-July. Reports provided by CPUC and generated by Maximus. A total of 3,414 applications were denied based upon denial code "5-10: Special denial letter mailed for duplicate discount found in the database".

48 Based on the 10/31/2021 count, the total active LifeLine customer population was 1,277,254. Of these, 1,210,155 [94.75%] received both federal and state subsidies, and 67,099 [5.25%] received only the state subsidy. Internal monthly report from TPA to CPUC. Titled: CA LifeLine October Report 11_15_2021 - Unprotected.xlsx

49 Analysis of TPA monthly reports, *2.5.3.2.1.4. Enrollment by Income or Program Report,* June 2020-July. Reports provided by CPUC and generated by Maximus.

LifeLine Customer Enrollment Methods

Currently, eligible customers can enroll in LifeLine by contacting or visiting their local approved California LifeLine telephone Service Provider. In July 2021, at the direction of CPUC, the TPA updated the Service Providers' plans on the website to allow potential customers to enter their zip code and see all currently available Service Providers in their area, compare plans and services, and then select a Service Provider with whom they would like to enroll.[50] Eligible customers can then go to the Service Provider's website and apply electronically or visit the candidate Service Provider in person. While in-person and web enrollment are both options, 98 percent of *wireless* enrollment happens via the Direct Application Process (DAP). DAP enrollment is currently almost exclusively utilized by "Street Teams." Planned for rollout in spring of 2022 is a new enrollment method, termed Service Provider Intake Application Programming Interface (SPIA) wherein Service Providers can submit a customer's application data online and receive near real-time responses regarding eligibility. The DAP and SPIA processes are described in the subsection below, and in Appendix F.

"Street Teams" work for individual **Service Providers** and conduct enrollment outreach in locations in which there is a high frequency or saturation of eligible customers. The most common locations are outside benefits offices or county buildings in which potentially eligible customers receive a variety of other social services. Street Teams frequently set up a pop-tent and table, kiosk, or booth and typically have Service Provider-specific advertising associated with their outreach. Street Teams are discussed in more detail in the *Phone Service Providers* and *Market Competition* Sections of this report.

When enrolling customers, Service Providers are required to review eligibility rules and then assist the customer to request an application. Customers who interact with Street Teams most frequently enroll with the assistance of a Street Team member and their applications are submitted by the Service Provider using DAP. Alternatively, the customer may choose to use the paper process, or the online process offered by the California LifeLine website to complete an application. SPIA as an application method will be available at the time of report publication. If the paper process is selected, the customer is mailed an application form and a personal identification number (PIN) in a *pink envelope*[51]. The applicant's enrollment code and PIN, found in the *pink envelope* documentation, must be provided for the online application. The form must be completed, signed, and submitted online or mailed back to the TPA along with any other required documentation (such as documentation confirming program or income eligibility) by a specified due date. A customer who applies online through a *wireless* Service Provider's website will have his/her application submitted to the TPA through the DAP process (or SPIA process beginning in spring 2022).

LifeLine enrollment and renewal materials are currently available in seven languages.[52] The consumer's written language preference is part of the initial application process and is provided by the Service Provider. Subsequent written communication will be provided in their chosen language, including renewal forms and documents. However, text message notifications are only available in English and Spanish. The *Customer Experience* Section of this report provides customer feedback related to language support offered by LifeLine and Service Providers.

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50   *https://www.californialifeline.com/en/provider_search*

51   A *pink envelope* is specifically used by the TPA to provide hard copy application forms to an applicant. This process is commonly referred to by CPUC, the TPA, and Service Providers as "the *pink envelope* process."

52   Languages in which customers can enroll through the LifeLine website include: English, Spanish, Chinese, Korean, Japanese, Tagalog, and Vietnamese. In addition to the languages listed above, customers calling the TPA call center may also speak to someone in Cambodian or Hmong.

LifeLine Application Processes

The process for new *wireless* customer applications and enrollments includes a Service Provider submitting the applicant's enrollment information to the TPA via the DAP process. If the TPA's validation check confirms that the customer is not currently enrolled in the system, the TPA generates an application form, in portable document format (PDF), prepopulated with the customer's information. The TPA posts the form to the California LifeLine Administrator's secure File Transfer Protocol (sFTP) server. The Service Provider downloads the form from the sFTP site. The Service Provider then overlays the form with the applicant's signature, initials, and the applicant's basis for qualification selections (such as CalFresh). The Service Provider posts the application form, supporting documentation and a plain text file containing all the data entered by the applicant on the application form on the California LifeLine Administrator's sFTP server. The TPA then retrieves the file for processing. The DAP process is not currently available for *wireline* enrollment.

In the event the Service Provider did not use the DAP process the *pink envelope* process is triggered to deliver the application to the applicant. As soon as the application process starts, the form is generated. During form generation, the PIN is assigned and is printed on the first page of the application form. The applicant needs the assigned PIN to apply online using the California LifeLine public website. The applicant utilizes the *pink envelope* or the applicant can obtain their PIN from a TPA Call Center Customer Service Representative. Once the applicant is in possession of the PIN, the online application can be completed.

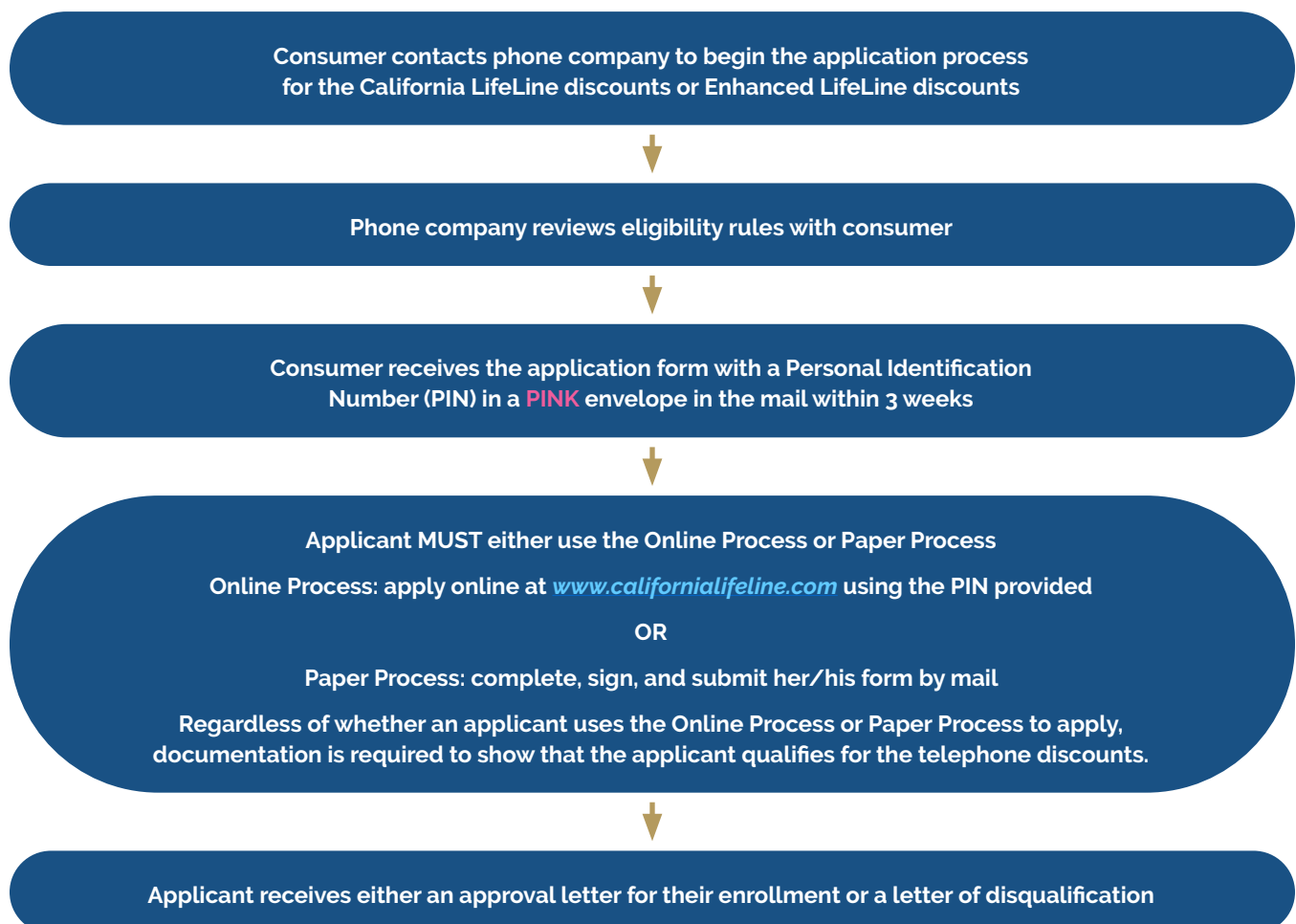**TABLE 12. Steps Required for Direct Application Processing for Wireless Customer Enrollments.**

	Direct Application Process (DAP) for *Wireless* Customer Enrollments
1.	Consumer interacts with a LifeLine *wireless* Service Provider representative
2.	*Wireless* Service Provider submits the customer's name, last four digits of social security number, date of birth, and address to the TPA using the DAP "Check Customer Status" Application Programming Interface (API) call
3.	The TPA performs a validation check and responds to the Service Provider if the customer will be treated as a NEW applicant or a TRANSFER applicant.
4.	If the TPA responds that the customer is approved for TRANSFER, the *wireless* Service Provider may submit a Direct Application Request (DAR) API call. Upon receipt of the DAR API call, the TPA initiates a 30-day enrollment request freeze for the customer and the TPA completes the transfer process with no additional requirements for the customer.
5.	If the TPA responds that the customer be treated as a NEW applicant, the Service Provider may submit a DAR API call.
6.	Upon receipt of the Service Provider's DAR API call, the TPA will prepopulate a LifeLine application with the customer data submitted by the Service Provider. The prepopulated application form is placed on the LifeLine sFTP server for the Service Provider.
7.	The Service Provider retrieves the prepopulated application from the LifeLine sFTP and presents the form to the customer for signature.
8.	The Service Provider submits the completed application, documentation supporting LifeLine eligibility and metadata to the TPA.
9.	The TPA routes the application and supporting documentation to the form review task queue.
10.	The TPA forms reviewer has three business days to complete the review.
11.	If the review decision is an approval and the Service Provider needs to update the customer's phone number from a "temporary" telephone number to a "real" telephone number, they will have 30 calendar days to complete this task. If the Service Provider has already updated the consumer's phone number to a "real" telephone number, the Service Provider will receive a Certification Approval.

Wireline Service Providers submit a customer's application request to the TPA using a daily file process involving a sFTP server. Upon receipt of the application request, the TPA fulfills the *wireline* application request via the *pink envelope* process that utilizes postal mail. Customers opting for enrollment through a *wireline* Service Provider may submit their application by mail or by using the public website. Customers who complete their application using the public website must have their phone number and PIN to complete the enrollment process utilizing the *pink envelope* process or they can obtain the PIN from a TPA Call Center Customer Service Representative.

Of note, over the six-month period before programmatic changes due to COVID-19 were implemented (September 2019 through February 2020), the TPA received 239,200 application forms via postal mail. During the same time, the TPA received 341,753 pieces of returned "undeliverable mail" which consists of applications, renewal forms, decision letters, postcards, and other outbound Program correspondence. In other words, the TPA receives about three pieces of returned/undeliverable mail for every two applications/renewals that are submitted for processing.[53] Roughly 60 percent of the forms that are mailed are returned undeliverable.

The CPUC website provides the following illustration of the current LifeLine *pink envelope* application process for new *wireline* and *wireless* customers.

Figure 14: CPUC Illustration of Current LifeLine *Pink Envelope* Application Process for new *Wireline* and *Wireless* Customers.

Consumer contacts phone company to begin the application process for the California LifeLine discounts or Enhanced LifeLine discounts

Phone company reviews eligibility rules with consumer

Consumer receives the application form with a Personal Identification Number (PIN) in a PINK envelope in the mail within 3 weeks

Applicant MUST either use the Online Process or Paper Process

Online Process: apply online at *www.californialifeline.com* using the PIN provided

OR

Paper Process: complete, sign, and submit her/his form by mail

Regardless of whether an applicant uses the Online Process or Paper Process to apply, documentation is required to show that the applicant qualifies for the telephone discounts.

Applicant receives either an approval letter for their enrollment or a letter of disqualification

53   Maximus, *California LifeLine Administrator Presentation to the Administrative Committee*, December 16th, 2020. Note that report does not include total number of outbound mail sent by TPA.

As noted above, under development and planned for implementation on March 14, 2022, is the SPIA, as an intake method for both new applications and renewals for *wireless* and *wireline* customers[54]. Whereas the DAP process can take up to several days to complete, the SPIA process allows for real-time intake of applications. SPIA will immediately notify the Service Provider if: the applicant's LifeLine program-based eligibility can be established by a check of the CalFresh database; the applicant is required to complete an independent economic household (IEH) worksheet; and the applicant is required to submit identity verification documentation as a part of the enrollment application submission. The information that is communicated to the Service Provider by SPIA allows for collection of that documentation while the Service Provider's representative is interacting with the customer. As LifeLine customer renewals do not require the submission of proof of program-based qualification, automated review and approval for SPIA-submitted renewal forms is possible[55]. SPIA will also be available for both *wireless* and *wireline* enrollments. SPIA is expected to result in a marked decrease in correctable denials[56] (correctable denials are described in the following subsection) as well as delivering the expedited and simplified process that Service Providers have requested. It is also a significant enhancement from the customer experience perspective that is discussed in greater detail in that respective section of the report.

TABLE 13. Feature Comparison of Direct Application Process API (DAP) vs. Service Provider Intake API (SPIA)

Feature	DAP	SPIA
Real time check for participant's LifeLine status	✓ Yes	✓ Yes
Real time renewal status check, including for prospective transfer participants	✓ Yes	✓ Yes
Real time IEH worksheet indicator	✓ Yes – DAPxml ✗ No – classic DAP method	✓ Yes
Real time subscriber transfer completion	✗ No	✓ Yes
Availability for wireless and wireline service providers	✗ No – *Wireless* only	✓ Yes
Certification and renewal intake channels	✗ No	✓ Yes
Single API for submission of new applications, transfers, and renewals	✗ No	✓ Yes
Real time external database matching for LifeLine eligibility check	✗ No	✓ Yes
Real time new application metadata submission	✗ No – DAP file process required	✓ Yes
Real time application status check	✗ No	✓ Yes
Real time identity documentation required indicator	✗ No	✓ Yes
Real time reconnect functionality	✗ No	✓ Yes
Real time method for submission of eligibility, IEH and identity documentation	✗ No – DAP file process required	✓ Yes
Form review decisions in near real time* without daily return file process required	✗ No	✓ Yes

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54   As of October 30, 2020, SPIA was available for *wireless* and *wireline* renewals only. SPIA as an intake method for enrollment applications is targeted for deployment on March 14, 2022.

55   This enhancement does not apply to renewal forms submitted through the US mail because renewal forms submitted through the US mail require validation of "wet" signatures rather than electronic signatures.

56   The decrease in correctible denials will be dependent upon adoption of SPIA by *wireline* service providers. Correctible denials in the enrollment application process tend to be higher for *wireline* applicants because Service Providers may not be involved in the preparation and review of applications prior to submission to the TPA for the eligibility determination.

Feature	DAP	SPIA
Service provider not required to maintain a codebase for a callback API and Check Form Print Status	✗ No	✓ Yes
Service provider not required to insert consumer metadata into form	✗ No	✓ Yes
Service provider not required to convert consumer- provided images to PDF format	✗ No	✓ Yes

*If found in external eligibility databases and passes internal validations.*

As previously noted, while most states utilize the National Verifier to verify eligibility, California (along with Oregon and Texas) maintains its own verification of eligibility process[57]. Upon receipt of an application, the TPA utilizes LexisNexis® to securely perform identity and physical address verification, and subsequently verifies the person's income- or program-based eligibility.

If an individual's identity cannot be readily verified, the customer will be sent an identity authentication form (IDAF) to complete. Historically the response rate for IDAFs has been low, as postal mail was being used as the document exchange method. However, on November 30, 2021 the ability to complete the IDAF paperwork was made digital. Customers can now complete this form via the public website. *Wireless* customers needing to upload required identity documentation to the TPA will receive a real-time text message inclusive of a document upload link to the website. The alert method for *wireline* participants are pre-recorded outbound calls using an automated dialer directing them to submit their identity documentation through the California LifeLine public website.
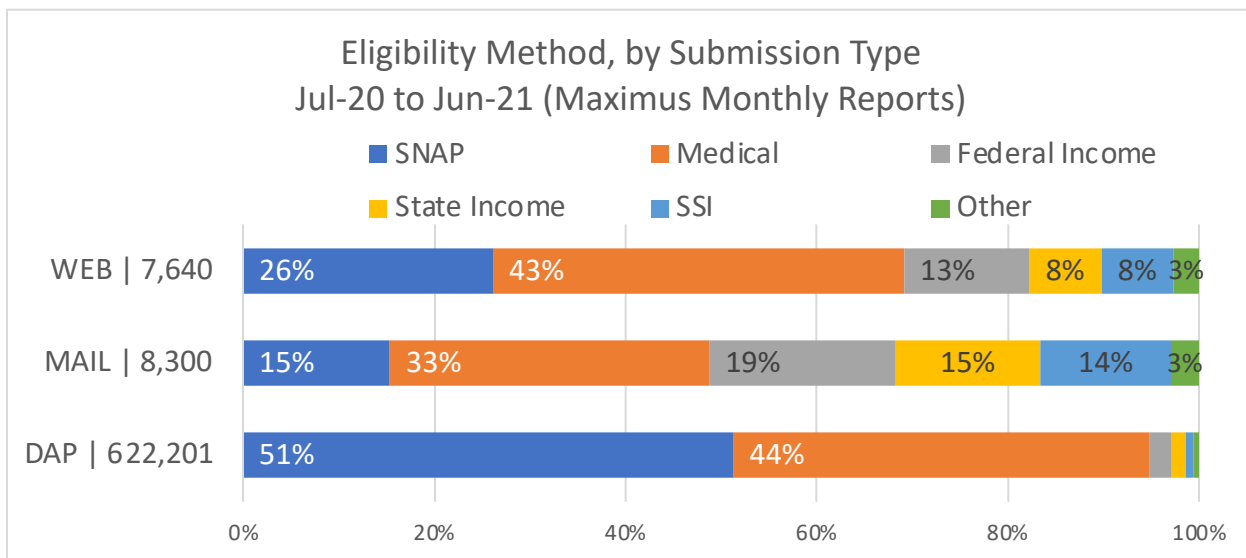
The TPA renders decisions on all applications within three business days from receipt. The TPA confirms applicants' income- or program-based eligibility for LifeLine. The applicant then receives either an approval letter for their enrollment, a request for missing or incomplete information, or a letter of disqualification. The entire enrollment process from the time an applicant contacts a Service Provider to the time they are approved is approximately four business days for the DAP process, and from two to four weeks for the *pink envelope* process.

The following figures demonstrate the methods by which customers apply to participate in the LifeLine program and the methods by which their eligibility is confirmed. The overwhelming majority (98 percent) of customers currently apply through DAP.

57   A complete list of approved identity and eligibility verification documents is found in *Appendix C.*

Figure 15. Submission Methods Used by Customers Applying to Participate in the LifeLine Program[58]

Eligibility Submission Type
Jul-20 to Jun-21

DAP 98%
Mail 1%
Web 1%
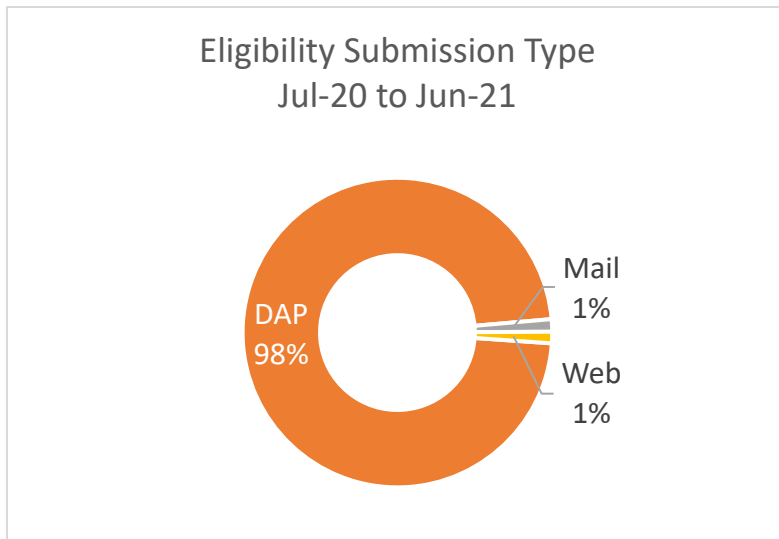
Figure 16. Methods by Submission Type in which LifeLine Eligibility is Confirmed[59]

Eligibility Method, by Submission Type
Jul-20 to Jun-21 (Maximus Monthly Reports)

Legend: ■ SNAP ■ Medical ■ Federal Income ■ State Income ■ SSI ■ Other

Submission Type	SNAP	Medical	Federal Income	State Income	SSI	Other
WEB | 7,640	26%	43%	13%	8%	8%	3%
MAIL | 8,300	15%	33%	19%	15%	14%	3%
DAP | 622,201	51%	44%				

Customers who are denied from participating in the LifeLine program may appeal. Appeals as well as complaints are handled through the CPUC's Consumer Affairs Branch (CAB)[60].

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58   Analysis of TPA monthly reports, 2.5.3.2.1.4 (Enrollment by Income or Program Report), June 2020-July 2021. Reports provided by CPUC and generated by Maximus.

59   Ibid.

60   https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch

LifeLine Customer Annual Renewal Process

Per FCC and state requirements, all existing LifeLine customers must renew annually based on the approval date of their application[61]. The current *wireline* or *wireless* customer will automatically receive a renewal form with their PIN in a *pink envelope* via mail 105 days prior to their anniversary date. In addition, *wireless* customers receive up to four text message notifications and up to two pre-recorded outbound reminder calls initiated by an automated dialer from the TPA reminding them of the renewal process and deadline. The TPA is able to provide the customer with a new form as needed provided the due date for responding to the renewal form has not expired, or retrieve a lost PIN if the customer requests it by contacting the help line.

The customer can then complete and submit their renewal form by mail or complete the paperwork online using their PIN. Whether a customer renews online or returns the completed forms by postal mail, they must respond by the due date and cannot renew online without their PIN[62]. The due date is specific to the customer and is found on the application and renewal forms. Customers who do not complete their renewal paperwork by the deadline are discontinued from the program and must apply as a new customer[63].

Following review by the TPA for eligibility, the customer will receive a letter via postal mail confirming their renewal, notification if a correction is needed to their renewal form (termed a correctable denial), or a denial letter from the LifeLine program. Customers who are denied from participating in the program may appeal.

Of note, CPUC and the California Department of Social Services (CDSS) recently executed an interagency agreement that allows the LifeLine program to utilize CDSS' new CalFresh Confirm solution to verify active CalFresh enrollment, and thereby, eligibility for LifeLine. Access to CalFresh Confirm allows the TPA to automate the verification of LifeLine program eligibility for existing subscribers whose renewal windows are starting. The integration with CalFresh Confirm, deployed on November 12, 2021, includes functionality for the TPA's form reviewers to perform on-demand CalFresh Confirm eligibility checks for renewing customers.

Correctable Denials and Denials Process

If an enrollment or renewal form has missing or erroneous information, the application will be temporarily denied and the customer reissued a form via a process called correctable denials. The correctible denial process is available once during the new enrollment and renewal processes. Specifically, at the beginning of either process, a form is sent to an applicant with a due date. If the applicant responds to the form but the submission is missing information or is incomplete, the initial form is denied but the applicant is sent a new form and afforded a second opportunity to provide a fully completed form. The applicant receives a 22-day period from the day the correctable denial is created, to return their corrected application form. If the applicants' second submission is missing information or is incomplete, the process is completed with a final denial.

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61   The annual renewal deadline date is referred to as a subscriber's Program anniversary date.

62   There are two text messages sent to *wireless* subscribers during the renewal process that offer the subscribers the opportunity to click a hyperlink in the text message and bypass entering or knowing their PIN because the PIN is embedded in the hyperlink.

63   *https://www.cpuc.ca.gov/-/media/cpuc-website/files/uploadedfiles/cpucwebsite/content/utilitiesindustries/communications/serviceproviderinfo/cdlifelinenumbering/timeline-renewals-062315.pdf*

Fourteen percent of applications are initially denied. Reasons for denial of an enrollment or renewal application include:

- The customer did not return the form or register online by the due date.
- The form is incomplete.
- The customer does not meet eligibility requirements.
- The form is incorrect (and is not considered correctible).
- The customer did not provide the appropriate documents to prove eligibility.
- The person signing up was claimed on someone else's income tax return as a dependent and thus is not considered an eligible customer.
- The customer was already receiving the California LifeLine discount and was not eligible for a second phone line with the California LifeLine discount.
- The form did not have the customer's signature.
- The application information was not received from the phone company/ the phone company did not activate service.

Table 14. Application Denials from July 2020 – June 2021[64]

Application Form Type	# Denied	Total Forms	Percent Denied
Totals	**151,597**	**874,713**	**17%**
Enrollment Application Form	118,659	838,341	14%
Identity Verification (IDV) Form[65]	32,938	36,366	91%

Given that 91 percent of IDV application forms are denied due to not being returned, program improvements that simplify and immediately verify identity such as SPIA may have significant impacts on enrollment and renewal rates moving forward. The relevant SPIA enhancement is a request/notification to the Service Provider that identity documentation should be collected from the applicant directly and submitted as a part of the new enrollment application or renewal submission.

Subsidies for Service

For *wireless* LifeLine customers, the combined subsidy typically covers all monthly charges. The *wireless* customer is effectively receiving free cellular service and likely never receives a monthly bill from their Service Provider. In instances where a customer visits a Service Provider's Street Team[66] booth to apply for *wireless* LifeLine service, the customer can leave the booth with a cellular device in hand and a temporarily active phone while their eligibility is verified (a process called presumptive enrollment). If their application is approved, service continues uninterrupted. If it is denied, the service is terminated until a correction can be made. Because applicants must be approved before a Service Provider receives the subsidy, if a customer remains ineligible, the Service Provider is not reimbursed a service connection fee.

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64   Analysis of TPA monthly reports, *2.5.3.2.1.3. Denials (Disqualified) Report,* June 2020-July. Reports provided by CPUC and generated by Maximus.

65   IDV Forms are sent through postal mail and generally denied for non-response.

66   Street Teams are discussed in detail in *Customer Experience, Program Awareness, Marketing* and *Outreach* Sections of the report.

The combined federal and state subsidy amount for *wireline* LifeLine customers is not enough to cover the entire cost of service. The customer is responsible to pay the difference between the Service Provider's regular rates and the LifeLine discounted rates for any applicable monthly service charges.

Current LifeLine subsidy amounts and minimum service standards are provided in Tables 2 and 3 above. Costs for monthly services were collected in December 2021, by contacting the top five *wireline* Service Providers' customer numbers and websites (and may vary by residences' location). Costs to *wireline* LifeLine customers range from $7.33 to $15.90 per month.

Table 15. Comparison of Top 5 LifeLine *Wireline* Service Providers' Costs to Customers

LifeLine *Wireline* Providers	Quoted Monthly At-Market Cost	CA Subsidy Level Dec 2021	Federal Subsidy Level	Cost to LifeLine Customer | Dec 2021
ATT	$ 38.00			$ 15.90
ConnectTo	$ 31.99			$ 9.89
Frontier	$ 29.99	$16.85	$5.25	$ 7.89
Spectrum	$ 29.99			$ 7.89
Blue Casa	$ 29.43			$ 7.33

Identified Operational Challenges in the LifeLine Program

In the following section and different than other parts of this document, direct input from interviews is presented and as such, associated analysis and recommendations are also introduced (as well as repeated in the subsequent Recommendations Section of the report).

LifeLine Definition - Social Services or Utility Program

In several interviews with Communications Division staff, participants described that implementation of subsidized utilities programs are often structured in a manner wherein implementation is carried out by a third party. For example, the CARE and Family Electric Rate Assistance (FERA) Programs are administered by the utilities themselves under the auspices of the CPUC.

> LifeLine is effectively a benefits program administered by a utility regulator, and by extension staff who are primarily hired for and have background in utilities operations not the administration of benefits programs to low-income Californians. The result is program design and implementation decisions that make it challenging to create methods to connect with, and be responsive to, the needs of target populations.

The primary challenge in structuring LifeLine in this manner is that it is effectively a benefits program addressing a de-regulated industry, administered by a utility regulator, and by extension, staff with greater experience in utilities operations but not necessarily administration of benefits programs. The result is program design and implementation decisions that make it challenging to create methods to connect with, and be responsive to, the needs of target populations. A consistent theme throughout all aspects of this Evaluation is that well-intentioned attempts to improve the program have historically been approached through a utilities lens that operates in a competitive market landscape, rather than through the lens of a social services program designed to meet the needs of vulnerable populations.

To expand further, the LifeLine program (and by extension the Communications Division staff) must adhere to:

- FCC Lifeline rules to ensure customers receive the federal subsidy.
- CPUC's operational regulations regarding budgeting/funding and program implementation.
- CPUC Commissioner's direction on where to focus efforts for a termed amount of time, while managing daily operations of the program by the TPA and IT consultant.

This results in limited flexibility in LifeLine program operations.

As with other state agencies, constraints on LifeLine budgeting (via legislative decision-making) must also be considered as a challenging factor in which CPUC has limited control. Any annual underspending on LifeLine program administration line-item costs cannot be reallocated to other areas within the program. Communications Division staff can only request increases in, or reapportionment of funding during specific times of the year, and funding is only approved by the legislature once per calendar year. This further limits the ability of staff to adapt operations mid-year to address programmatic implementation issues that may have been evident for some time.

That said, there remain distinct benefits to the administration of this program by a utility regulator:

- Significant funding for program implementation.
- Jurisdictional and regulatory authority (via CPUC Utility Enforcement and Utilities Audit branches) to take enforcement actions if needed.
- Authority to require select data from Service Providers, with ability to penalize via fines if denied.
- Staff are subject matter experts in telecommunications.

Staffing Limitations

LifeLine operations are structured such that the TPA and IT consultant are responsible for the daily administration of the program. Service Providers conduct outreach and marketing and are ultimately responsible for securing customer enrollments. The Communications Division monitors, directs, and implements ongoing policy changes to the program.

Until 2015, there were approximately five or fewer Communications Division staff assigned to LifeLine and associated implementation of the $400 million per year program and its approximately 1.3 million participants. In 2015 staffing resources were increased to 7.5 staff. As of December 2021, there were 14.5 Communications Division staff supporting the LifeLine program. Five Communications Division staff members have been with the LifeLine program for two years or more, while eight staff members on-boarded in their positions during the course of this Evaluation.

While staffing has recently increased for the program, and LifeLine program improvements and enhancements are expected as a result, many stakeholder groups interviewed commented upon a consistent, high degree of turnover and vacancies in respective positions. Furthermore, stakeholders described Communications Division staff as believing in the mission and value of the program, but being limited by lack of resources and collective capacity to meet workload demands.

The degree of staff turnover can be partially attributed to hiring and promotional practices of the CPUC writ large. For example, when a staff analyst desires to move up in rank, rather than being promoted within their given team (e.g., the Communications Division) the analyst must apply for a promotional opportunity often with a different team. This type of staffing exchange limits

institutional knowledge about program administration and can impede the ability to improve the program in meaningful and effective ways as desired by all stakeholder groups, including Communications Division staff. The implementation of pilot programs, data enhancements, and similar is affected by staff and resource limitations as well.

Lost Institutional Knowledge

CPUC contracts out the daily administration of LifeLine to a TPA. TPAs are contracted for up to a maximum of five years, with three mandatory years and two, one-year optional extensions at the CPUC's discretion. Operational knowledge is passed on from TPAs through Business Requirements Documents (BRDs) as a standard practice. However, the robustness in description of operations has been limited resulting in much institutional knowledge residing with the TPA staff themselves. This knowledge is therefore at risk of loss upon TPA turn-over.

Communications Division staff experienced this challenge during the transition from the former TPA, Conduent, to the current TPA, Maximus. In response, staff increased the requirements for documentation of daily program operations by the TPA in the most recent RFP for future TPA services. Furthermore, up to $4 million has been budgeted in TPA transition costs in 2022 - 2023[67].

CPUC reportedly since hired a technical consultant to review BRDs independently and capture institutional knowledge for LifeLine staff. According to Communications Division staff the consultant, also provides technical and support resources, and assists LifeLine staff with day-to-day operations, contract compliance oversight, development of operational requirements for new policies and rules, and issue resolution of TPA databases and platforms. The consultant's second contract started on July 15, 2021 and will end on July 15, 2023, with the option to extend the contract by an additional one-year period to July 14 ,2024.-The consultant has significantly assisted in documenting operational knowledge of TPA processes within CPUC knowledge base systems. The consultant was not able to be engaged as part of the evaluation.

Public Engagement

The following Working Groups and committees are engaged in varying degrees in LifeLine program implementation:

- (Ad Hoc) GO 153 Working Group
- (Ad Hoc) Renewals Working Group
- California LifeLine Working Group
- Consumer Advocate Working Group
- LifeLine Advisory Committee or Universal Lifeline Telephone Service Administrative Committee (ULTSAC)
- Low Income Oversight Board (LIOB)
- Service Provider Working Group

The composition, level of influence and frequency of meetings among these groups varies widely. For some, such as the ULTSAC and Ad Hoc groups, roles and purpose are clearly defined in statute or scoping memos. For others, such as Working Groups, the scope and level of influence is more fluid.

Interviews were conducted with most persons serving on the ULTSAC and LIOB, and with numerous stakeholders who actively participate in one or more of the other Working Groups listed above[68]. Though ULTSAC members and some Working Groups are asked for input on agenda items in advance of meetings by Communications Division staff, many interviewees expressed a desire to have more clarity about Communications Division staff priorities as it pertains to agenda setting, topics and projects brought forward for discussions. The majority sentiment expressed was of possible misalignment between topics that are added to agendas and those that are most relevant and pertinent to the stakeholders (e.g., customer advocate groups, Service Providers, community-based organizations). Said interviewees also desired more opportunity to influence agendas and engage in discussions that have the potential for meaningful impact on programmatic improvements and policy implementation. A few interviewees who participate in more than one of these groups/committees expressed frustration regarding the perceived lack of interaction and information exchange between groups.

None of the Service Providers interviewed reported having regular, direct or personal engagement with Communications Division staff persons regarding program administration or implementation. Most of their reported engagement with Communications Division staff is through participation in Commission hearings or LifeLine/Service Provider Working Group meetings. There is a discrepancy in viewpoints by at least some Service Providers and Communications Division staff regarding frequency of communication and interaction among these two parties. Communications Division staff facilitates weekly Service Provider Working Group calls with participation by the TPA as an opportunity for discussion on administration/ implementation issues and engagement. Communications Division staff report some Service Provider representatives are highly active during these calls. Some interviewees/ members of the Working Groups and committees noted improvements in the processes due to recent changes in leadership and Communication Division staffing.

Given the diversity of public stakeholder representation in each of these Working Groups and committees, some of whom have been working with the LifeLine program since its inception, it appears that it would be of mutual benefit for Communications Division staff and these various groups to have increased clarity in their structures, roles, communication protocols and interrelationships as they collectively work toward the shared goal of program improvement. This is expanded upon in the Recommendations section of the report.

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68   Invitations to participate in confidential stakeholder interviews were provided to all members of the working groups and committees listed. Interviews were conducted with all parties that expressed desire to participate. A total of 93 interviews were conducted as part of this Evaluation.

Eligibility Requirements and Verification Processes

National Verifier

In March 2016, the FCC adopted the Lifeline Reform and Modernization Order (2016 Lifeline Order) to further update the Lifeline program, including the streamlining of eligibility verification for enrollment and recertification. Previously, eligible telecommunications carriers (ETCs) or state administrators were responsible to verify the eligibility of potential subscribers. The FCC recognized that this structure was complex, burdensome, and had the potential for waste, fraud, and abuse. With the adoption of the 2016 Lifeline Order, the FCC directed USAC to establish a system for independent, third-party eligibility determinations. To enable this new process, USAC built the National Lifeline Eligibility Verifier (National Verifier) to automate (where possible) and standardize, eligibility verification across all states and territories[69].

California, Oregon, and Texas have managed eligibility verification for the federal Lifeline program for many years. California opts to manage its own eligibility verification in order to allow for broader eligibility requirements. Pursuant to waivers granted under the 2012 Lifeline Order, ETCs in these states do not enroll their subscribers in National Lifeline Accountability Database (NLAD) which is the system of record for enrolled subscribers that handles disbursement activity.

Several *wireless* Service Providers who participated in stakeholder interviews and who offer Lifeline in other states in addition to California, were strong advocates of utilizing the National Verifier as a method to enhance customer and Service Provider experience. They reported that the ease and speed in which customers were able to enroll is much improved when using the National Verifier, and greatly increases uptake rates.

However, based on Commission and Communications Division stakeholder interviews, if California adopted the National Verifier, it would essentially nullify one of the key aspects to the California LifeLine program of including additional eligible customers with deeper levels of poverty and result in roughly 400,000 currently income-based eligible customers being dismissed from the program. In addition to the dismissal of the participants of the California-only program, the National Verifier does not currently have Automated Data Connections established for the State of California. CPUC is now rolling out its established automated data connection with CalFresh to enhance customer and Service Provider experience along with a greater rate of eligibility verification.

69   National Verifier Annual Report and Data January 31, 2022 (Pg 1, paragraph 1): *https://www.neca.org/docs/default-source/wwpdf/public/020122usac.pdf*

IV. SERVICE OFFERINGS & MARKET COMPETITION

Coverage and Offerings of Telephone Service Providers

> A 2018 study showed that the expansion to include *wireless* Service Providers significantly reduced out-of-pocket spending for households.

Service Providers receive subsidies from CPUC to offer LifeLine discounted or no-cost plans to customers, and the plans are a part of Service Providers' regular services and coverage. Service Providers that offer LifeLine *wireline* and *wireless* plans must meet requirements outlined by CPUC (described further in subsections below).[70]

Though originally a *wireline*-only phone program, *wireless* plans are now used by most customers (e.g., 83 percent of the ~1.3 million LifeLine enrollees in California[71]). National studies have pointed to the importance of *wireless* coverage over *wireline* for low-income families, in terms of their household mobility.[72] A 2018 study showed that the expansion to include *wireless* Service Providers significantly reduced out-of-pocket spending for households, and improved service quality by creating a new market space where Service Providers compete to provide the best service at an affordable rate for eligible households. The nation-wide study concluded that new *wireless* Lifeline plans included a greater number of minutes available compared to similar unsubsidized plans.[73]

As of July 2021, there were 24 Service Providers offering *wireline* LifeLine plans, and 11 Service Providers offering *wireless* LifeLine plans[74]. No Service Providers offer both *wireline* and *wireless* plans. The following is a list of approved providers and the percentage of their LifeLine customer base (as of July 2021).

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70   See California LifeLine Program – Rules and Regulations: *https://www.cpuc.ca.gov/customer-support/financial-assistance-savings-and-discounts/lifeline/lifeline-related-forms-and-notices-for-Service Providers.*

71   See Point-in-Time Analysis below in *Customer Experience* Section.

72   Hauge, Janice A., Eric P. Chiang, and Mark A. Jamison. 2009. "Whose Call is it? Targeting universal service programs to low-income households' telecommunication preferences." Telecommunications Policy 33:129-45

73   Conkling, Thomas S. 2018. "Crowd-Out or Affordability? The Lifeline Expansion's Effect on *Wireless* Service Spending." Journal of Policy Analysis and Management 37(2):357-83

74   Updated information provided by CPUC to University in March 2022 indicates there are 28 Service Providers offering *wireline* LifeLine plans, and 12 offering *wireless* plans.

Table 16. *Wireline* and *Wireless* Service Providers Offering LifeLine Subsidized Phone Plans to Customers and the Percent of LifeLine Customers That Make up Their Customer Base | Point in Time Analysis, July 2021[75]

WIRELESS Service Providers	# of Wireless Customers	% of Wireless Customers
Assurance *Wireless*	318,891	30%
Truconnect	267,187	25%
Tracfone	157,020	15%
Boomerang	102,676	10%
AmeriMex	62,977	6%
i-*wireless*, LLC	55,253	5%
Am. Broadband & Telecom. Co.	34,321	3%
Global Connections	33,335	3%
Air Voice *Wireless*, LLC	7,904	1%
Excess Telecom, Inc.	4,783	<1%
Tag Mobile	4,220	<1%

WIRELINE Service Providers	# of Wireline Customers	% of Wireline Customers
SBC	130,929	62%
Frontier	42,040	20%
Charter	12,741	6%
Cox	8,953	4%
BlueCasa	4,008	2%
ConnectTo	2,789	1%
Sierra	1,741	1%
Sebastian	1,237	1%
SureWest	969	<1%
MCI	788	<1%
ATT	660	<1%
Volcano	637	<1%
Ponderosa	618	<1%
Siskiyou	574	<1%
Frontier SWWC	476	<1%
CalOre	418	<1%
Ducor	262	<1%
Calaveras	229	<1%
TDS	198	<1%
PCS1	9	<1%
Race Communications	4	<1%
Pinnacles	2	<1%
Sage	2	<1%
WaveBroadband	2	<1%

There are variations across Service Providers in the types of plans and services offered (i.e., minutes, text messages and data), coverage area, and the levels of enrollment they obtain. Aside from coverage area, variations between plans are relatively minimal because *wireless* LifeLine plans are now required to provide unlimited voice and texts. Specific features provided by Service Providers can also impact enrollment rates, such as three-way calling, call forwarding, out-of-state or international calls, or free devices with sign up. This may affect how customers view the overall desirability of LifeLine plans and in turn, their desire to participate in the program.

Table 17. Percent of Customers by Phone Type, Carrier, and Region | Point in Time Analysis, July 2021

	Total	Region 1 | Superior California	Region 2 | North Coast	Region 3 | San Francisco Bay Area	Region 4 | Northern San Joaquin Valley	Region 5 | Central Coast	Region 6 | Southern San Joaquin Valley	Region 7 | Inland Empire	Region 8 | Los Angeles County	Region 9 | Orange County	Region 10 | San Diego - Imperial County
WIRELINE SERVICE PROVIDERS	240,348	20,034	8,088	42,932	12,540	10,740	14,535	18,144	81,017	14,418	17,700
SBC	67%	74%	85%	98%	67%	53%	73%	17%	62%	65%	54%
Frontier	17%	13%	11%	1%	9%	34%	15%	62%	22%	16%	<1%
Charter	5%	1%	<1%	<1%	<1%	6%	1%	18%	9%	7%	3%
Cox	4%	-	-	-	-	4%	-	-	<1%	11%	39%
BlueCasa	2%	<1%	<1%	<1%	<1%	2%	1%	2%	3%	1%	3%
ConnectTo	1%	<1%	<1%	-	<1%	<1%	<1%	<1%	3%	-	<1%
Sierra	1%	-	-	-	14%	-	-	-	-	-	-
Sebastian	1%	1%	-	-	-	-	7%	-	-	-	-
SureWest	<1%	5%	-	-	-	-	-	-	-	-	-
15 Other *Wireline* Carriers	2%	6%	3%	<1%	10%	1%	4%	2%	1%	1%	<1%
WIRELESS SERVICE PROVIDERS	1,048,572	86,216	13,927	112,233	71,765	43,265	111,225	138,372	325,419	60,625	85,772
Assurance *Wireless*	30%	28%	32%	33%	20%	27%	23%	34%	33%	31%	37%
Truconnect	25%	25%	24%	28%	32%	42%	22%	21%	24%	25%	27%
Tracfone	15%	24%	25%	12%	17%	6%	15%	16%	16%	10%	10%
Boomerang	10%	7%	8%	7%	6%	7%	14%	14%	10%	13%	9%
AmeriMex	6%	6%	4%	6%	7%	4%	9%	5%	6%	8%	5%
i-*wireless*, LLC	5%	3%	3%	3%	9%	10%	8%	4%	4%	5%	8%
Am. Broadband & Telecom. Co.	3%	2%	3%	6%	2%	3%	1%	4%	4%	3%	2%
Global Connections	3%	5%	<1%	4%	7%	<1%	7%	<1%	3%	3%	1%
3 Other *Wireless* Carriers	%	1%	3%	2%	1%	1%	1%	3%	1%	2%	2%

There are no figures or maps publicly available from CPUC or the TPA depicting service coverage area (e.g., infrastructure for *wireline* service or cellular coverage) for LifeLine *wireline* or *wireless* Service Providers.[76] Thus, a review of telephone service coverage by region of the state was infeasible during this Evaluation.

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76   CPUC does retain *wireline*, broadband, and voice coverage data layers by Service Provider. However, a layered map of statewide coverage was unable to be produced for inclusion in the Evaluation.

Reasons for Service Providers' Enrollment in the LifeLine Program

Of the Service Providers interviewed and surveyed, many cited the importance of making communication services available to low-income customers, and finding the work rewarding, as reasons for their involvement in the program. This sentiment was also expressed by COLR who are required to participate in the program. Multiple Service Providers described certain populations that were especially and uniquely reliant on LifeLine services including rural and geographically isolated households as well as socially isolated groups such as Punjabi speaking populations and Hmong populations who speak a variety of languages and dialects.

Service Providers currently can receive a combined federal and state subsidy amount from $18.10 to $25.48 monthly per LifeLine subscriber effective January 2022, in addition to a $39 connection fee reimbursement for new customers[77]. For some small Service Providers, this income stream can be important to maintain their bottom line. However, in stakeholder interviews both *wireless* and *wireline* Service Providers described ever increasing challenges to comply with additional and/or evolving LifeLine requirements in an environment where costs are increasing at a higher rate than subsidies. Some *wireline* stakeholders report at best, a break-even scenario with their LifeLine programs[78].

Process to Become a LifeLine Service Provider

Eligible telecommunications carriers can offer a discount to eligible low-income customers on their *wireless* or *wireline* voice service or broadband (i.e., internet) service and receive a reimbursement from the federal universal service fund.[79] ETC's interested to offer Lifeline service must meet specific FCC and California requirements demonstrating their functionality, financial and technical capabilities, compliance with customer and service quality standards, and compliance with GO 153. Note that in California it is not necessary to be an ETC to provide California LifeLine and receive the state subsidy. However all but one LifeLine Service Providers are ETCs so they may offer the combined federal and state subsidy to their customers.

Communications Division staff indicated the processing time for Service Provider applications to become LifeLine providers can range from approximately four to six months. Requirements for Service Providers offering LifeLine are outlined on the USAC website[80] which details the federal and state processes. Service Providers may offer LifeLine to their customer base indefinitely without having to reapply/recertify, provided they remain a licensed and practicing ETC, or pass periodic background checks demonstrating their business and technical fitness to support LifeLine customers.

Once certified, Service Providers can begin working with the TPA on implementation of the LifeLine program. This includes incorporating LifeLine service offerings into their suite of existing offerings, developing and/or updating informational and marketing material to reflect these new offerings, and identity verification and enrollment eligibility verification for new and renewing customers. This latter process is described in more detail in the *Customer Experience* Section of this report.

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77   Because there is both the federal and state subsidy available, and each have tiers of discounts for services offered, the reimbursement that the Service Provider receives will vary per customer.

78   Internal financial data from Service Providers was not requested as part of this Evaluation.

79   *https://www.fcc.gov/general/universal-service-fund*

80   *https://www.usac.org/service-providers/*

Reasons for Service Providers to Not Participate in Program

Outreach was conducted to Service Providers who do not participate in the program with requests for confidential interviews. No response was received. Therefore, this Evaluation only includes interview and survey findings from Service Providers who currently offer LifeLine services.

While Service Providers interviewed openly shared feedback and suggestions on how to improve the program and increase enrollment, as well as challenges experienced in being a LifeLine provider, none expressed a desire to cease enrollment in the program. Absent specific inquiry about the rationale of non-participating Service Providers, during this line of questioning, several interviewees voluntarily offered their perspectives on why they or other Service Providers sometimes choose not to participate in the program. Comments include:

- The program design may be considered out of sync with customer need
- The subsidies are not incentivizing enough to encourage the largest service providers to participate
- The application requirements for enrollment as a Service Provider may be considered too onerous for some
- The regulations and requirements for Service Provider enrollment can be considered complicated and cumbersome
- Enrollment of new customers is not as streamlined and expeditious as it could be if the National Verifier or other data-sharing process was used
- It may be generally inconvenient to participate for some Service Providers

Both *wireline* and *wireless* Service Providers agreed that certain aspects of program implementation continue to use inefficient methods employed since the program's establishment in the 1980s. Examples provided include paper methods for enrollment and renewal; lack of modernized digital interfaces for customer and Service Provider information exchange; need for streamlined enrollment, renewal and verification processes; and subsidies that do not match the current market rates.

Wireline and *wireless* Service Provider interviewees expressed agreement that LifeLine enrollment and renewal processes are complicated and cumbersome for customers and result in eligible customers electing not to enroll or renew. They also expressed that the service standards have become more rigorous over the years which for *wireline* providers, results in a barely break-even scenario, and for *wireless* providers, results in a reduction in service and device quality to satisfy their bottom line. *Wireline* providers described a program that seemed to be continuously changing, one reported it as state of "constant flux", making it challenging, especially for small providers, to keep up with changes in implementation requirements. Conversely, some *wireless* providers expressed that Commission decision-making and Communications Division implementation took too long, describing it as moving at "glacial speed". Of note and as previously presented, Communications Division staff describe similar challenges limiting effective program administration due to consistent changes in state and federal program requirements on an annual basis.

As also stated above (and notwithstanding Communication Division perspectives on mitigating factors), Service Providers interviewed who provide Lifeline service in other states in addition to California were strong advocates to utilize the National Verifier for identity and eligibility verification. These Service Providers report that the ease and speed in which verification is accomplished via the National Verifier simplifies the enrollment process for all parties and improves the overall

customer experience. It also results in administrative cost savings for the Service Providers. They further described California's current identity verification process being complicated and cumbersome, sometimes resulting in eligible customers not enrolling in the program. This issue is further explored in the section on Program Awareness, Marketing and Community Outreach. Notwithstanding these sentiments related to the verification process, Service Providers interviewed generally reported positive working relationships with the TPA Maximus, their primary contact with the LifeLine program.

Program Implementation Mandates for Service Providers

In order to ensure maximum value for the universal service dollar, the FCC and CPUC establish specific support amounts and minimum service standards that Service Providers are required to offer LifeLine customers[81]. These values have been updated annually since 2016 [see tables 3 and 4 in Section 1].

Service Providers are also subject to other program implementation mandates, that are guided by Commission Decisions. For example, Service Providers must adjust administration of the program at the customer level and/or revise their outreach to customers in response to mandates such as: annual renewals freeze during COVID, portability freeze limiting a customer's ability to change Service Providers within an allocated time period, movement toward the elimination of VoIP service as a LifeLine program offering, and revised minimum service standard offerings.

Service Providers have historically advocated for minimal regulation of LifeLine program implementation. The two primary arguments used by Service Providers regarding their desire to limit regulations are: the Commission does not have the authority to regulate areas in which the FCC has already issued regulations[82], and additional regulation will constrain customer choice and by extension, market competition. It is important to note that CPUC regulates the program, and *wireless* Service Providers are not required to offer LifeLine. If they chose to participate, they agree to adhere to the rules of the program.

Several Service Providers interviewed also described their experience that the program too frequently undergoes changes to the requirements for implementation the Service Providers must adhere to (i.e., revised minimum service standard offerings, renewal freezes, etc.). Every regulation change requires CPUC Communications Division, the TPA, and Service Providers to dedicate resources to understand, incorporate, implement, and inform customers of said changes. This results in increased costs to the Service Provider, and often also results in customer confusion and can impact their desire to stay enrolled in the program. Generally, Service Providers want to be adequately compensated for providing LifeLine service and many do not feel that the current subsidy is accomplishing this, especially with respect to rising minimum service standard requirements. Documentation that identifies any existing cost discrepancy between the subsidy and the cost of the program that Service Providers incur has not been forthcoming from Service Providers and cannot be mandatorily required due to the deregulated nature of the Service Providers' role.

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81   See California LifeLine Program – Rules and Regulations:
      https://www.cpuc.ca.gov/customer-support/financial-assistance-savings-and-discounts/lifeline/lifeline-related-forms-and-notices-for-Service Providers

82   *Note:* The legal interpretation required to determine what is and is not within the CPUC's authority to regulate is beyond the scope and expertise of this Evaluation.

Customer Choice and Market Competition

Stated discrepancies among subsidies provided and costs incurred by Service Providers can limit the degree to which Service Providers customize their LifeLine program offerings, and in turn support customer choice and generate market competition. Here, the extent to which customer choice and market competition are limiting factors to overall enrollment rates is discussed.

Customer Choice

Customer choice is supported by a more open and competitive marketplace in which LifeLine eligible customers can choose to enroll with the Service Provider offering the plan most suited to meet the customer's personal service and affordability needs. A complicating factor limiting consumer choice is that most eligible customers do not realize they have a choice in Service Providers. Most focus group participants were unaware that there are a variety of Service Provider options to choose from until they were informed during focus group discussion[83].

For example, based on the Statewide survey, the top three responses (ranging from 44 percent to 31 percent of respondents) for reasons why *wireless* customers choose to enroll are not immediately based on comparison to other Service Providers. Only 14 percent of respondents indicate their choice in Service Provider was because said Service Provider offers the best overall service. Upon comparing offerings of the top six *wireless* Service Providers it is observed that similar plans, devices, and methods for enrollment are offered by all companies. This fact was acknowledged by Service Providers in stakeholder interviews and the Service Provider survey.
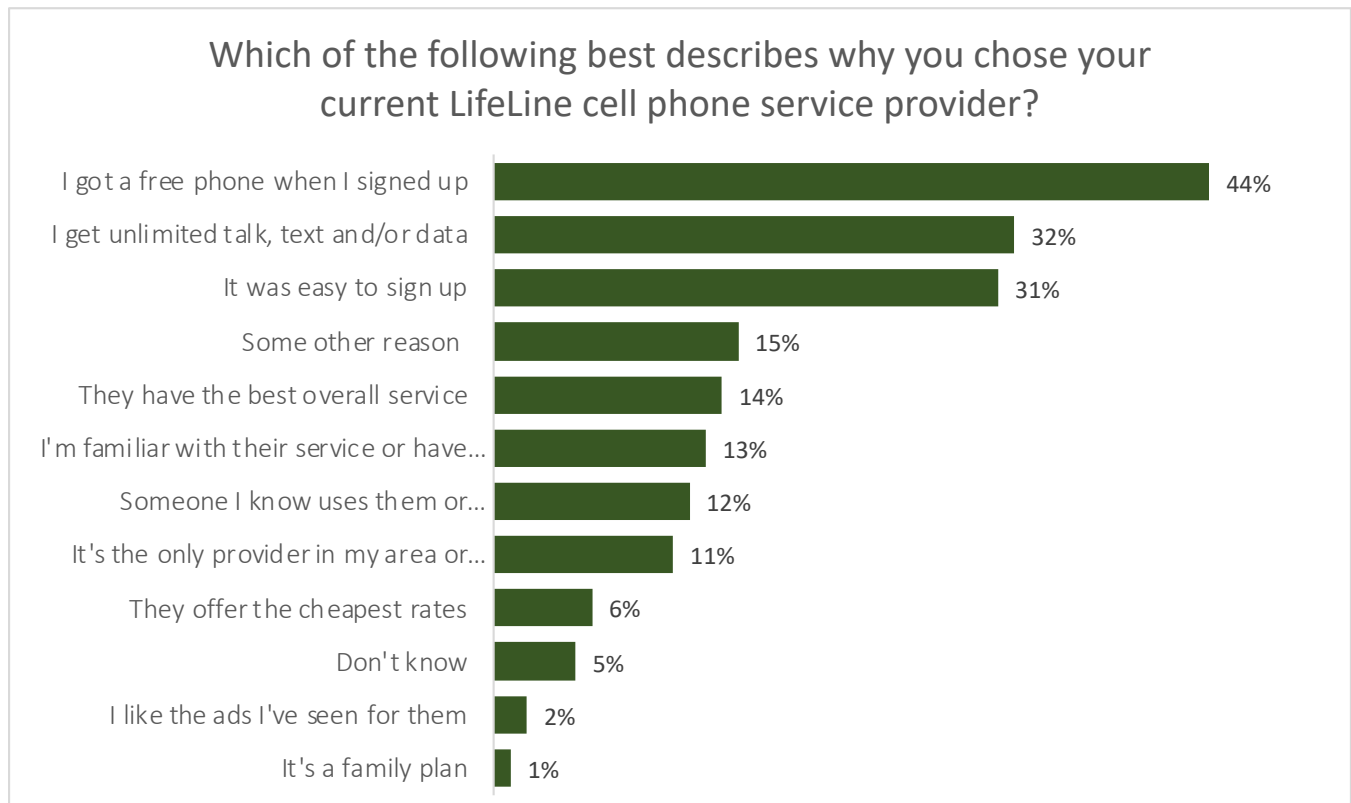
An important distinction influencing customer choice in California is customers in other states who apply through the National Verifier[84] first, sign up with National Verifier to determine if they are qualified for the program, then choose a phone or internet company, and finally sign up with their preferred Service Provider. Using this process, customers are informed of the Service Provider choices. However, in the California LifeLine process, customers are directed to a Service Provider to initiate the sign-up process, then go through the TPA eligibility check. It is unknown if Service Providers inform customers that they have other choices. Focus Group and stakeholder interviews with customers overwhelmingly reported that they were not informed or otherwise aware that they had choices in Service Providers.

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83   The CPUC LifeLine website currently offers the ability to search for approved LifeLine providers by zip code and select up to three plans for comparison.

84   *https://nationalverifier.servicenowservices.com/lifeline*

Which of the following best describes why you chose your current LifeLine cell phone service provider?

Reason	Percentage
I got a free phone when I signed up	44%
I get unlimited talk, text and/or data	32%
It was easy to sign up	31%
Some other reason	15%
They have the best overall service	14%
I'm familiar with their service or have…	13%
Someone I know uses them or…	12%
It's the only provider in my area or…	11%
They offer the cheapest rates	6%
Don't know	5%
I like the ads I've seen for them	2%
It's a family plan	1%

According to *wireless* Service Provider interviews, roughly 70% of *wireless* customer enrollment occurs via Street Teams. As previously described, Street Teams work for individual Service Providers and conduct enrollment outreach in locations in which there is a high prevalence of eligible customers. The most common locations are outside benefits offices or county buildings in which eligible individuals receive a variety of similar services. Street Teams typically set up a pop-tent and table, kiosk, or booth advertising "free phones." There is variation in how each Service Provider provides Street Team services. Some wear uniforms or shirts with logos which appear more "legitimate" to customers, whereas some were described by a few focus group participants as "working out of the back of a van."

Most focus group participants describe not actively seeking a free or discounted phone, rather encountering a Street Team when exiting a benefits office and learning they were eligible for LifeLine. Almost none of the current LifeLine customers who participated in the Evaluation's focus group sessions realized that there were many LifeLine Service Providers to choose from. It is reportedly atypical for multiple Street Teams to have booths set up in immediate proximity to one another, which would allow for some measure of customer comparison or choice.

Many customers interviewed report not realizing they were signing up with a specific Service Provider to receive their free cellphone service. This is evidenced by a commonly described experience of a customer returning to their first observable Street Team to address issues with their device or service and learning that they are not enrolled with that Service Provider.

During the focus group discussions, only one customer described his ability to effectively shop options and "upgrade" his service and device so frequently that he never recalled participating in a renewal process. This same individual also described having more than one *wireless* device so he repeatedly lent his LifeLine cellphone to others or gave it away before seeking a replacement.

From the perspective of the average customer, market competition among LifeLine Service Providers is more a matter of opportunity than choice. It almost exclusively advantages individuals who live in more urban areas where Street Teams are most common. However, even in these circumstances, as stated above, many currently enrolled customers remain unaware that there are a variety of Service Providers who offer the LifeLine program and with whom they can enroll should they desire different plans/services. Supplementary discussion regarding Street Teams is provided in a subsection below.

An additional influence on customer choice was the word-of-mouth effect in which CBOs and Social Services departments actively engaged in referring and/or supporting clients with access to the LifeLine program. In these cases, based on feedback from other clients and in some cases direct experience with Street Team members, staff will refer eligible customers to specific Service Providers known to provide a more "reliable", "reputable", "responsible", and/or "respectful" customer experience.

Market Competition Among Service Providers

As noted previously, in order to receive the full subsidy amount LifeLine Service Providers must provide minimum service standards to LifeLine customers. Thus, to be more competitive in the marketplace, some Service Providers offer or have offered free three-way and/or international calling, access to a special customer service phone line, or a Service Provider-developed LifeLine phone application as part of their LifeLine plan offerings. Additionally, all *wireless* Service Providers interviewed have opted to provide free devices upon sign-up. Of note, the 2016 Lifeline Modernization Order[85] requires that Service Providers choosing to provide devices to customers ensure the device is wi-fi enabled. Seventy-five percent of devices must also be equipped with hotspot functionality according to a prescribed transition period through 2024.

All Service Providers interviewed reported that while providing a device to customers upon enrollment is not required, it did at one point provide a competitive edge to enroll additional customers. Several Service Providers acknowledge that the "competition" may have plateaued with little remaining incentive to compete due to unjustifiable impact to their bottom line. Many Service Providers cited increasing requirements for minimum service standards without an increase in subsidy as a hinderance to investing in higher quality free devices for customers as a means to engage in market competition. It is recognized that Service Providers will only offer as competitive a product and service as they believe they can accommodate for the subsidy they receive. Minimum service standards by the FCC and CPUC and respective subsidy amounts have been updated annually since 2016. It remains challenging for the CPUC to determine the appropriate subsidy amount for services, given that financial data from Service Providers is not forthcoming nor mandatorily provided.

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85   *https://www.fcc.gov/document/fcc-modernizes-lifeline-program-digital-age*

Street Teams

Street Teams work for individual Service Providers and conduct enrollment outreach in locations in which there is a high frequency of eligible customers. Street Teams are not a required component for LifeLine outreach. However, Service Providers reported that roughly 70% of LifeLine *wireless* enrollment occurs via Street Teams, which speaks to their value in reaching the eligible population.

A benefit of utilizing Street Teams for outreach is their ability to target a population base that is historically difficult to reach via traditional marketing methods. Street Teams set-up at/near locations in which eligible customers are likely to be concentrated, and the customer can walk away with a cellular device in hand. The convenience of this approach is of particular benefit to individuals with lower incomes because it limits additional trips, follow-up appointments, and job, transportation or childcare coordination that more heavily impacts people experiencing poverty.

Every stakeholder group interviewed expressed some undesirable opinion of the Street Teams and their impact on the perception of the LifeLine program. While Social Services workers, customer advocate groups, CBOs, Service Providers, and Communications Division staff agree that the immediate accessibility of cellular devices in customers hands is a significant benefit to some of the most vulnerable clients, the stigma and reputation associated with the Street Teams results in potential customer loss and in some cases reputable Service Providers avoiding the program entirely.

Challenges associated with Street Teams described during stakeholder interviews and focus group discussions are summarized:

a. It was widely reported in stakeholder interviews that Street Team members do not, as a matter of practice, provide general information to customers about how the LifeLine program operates upon enrollment with a Service Provider. For example, that the customer is receiving a state and federal subsidy, only one LifeLine per household is allowable, or the customer is required to renew their eligibility annually.

b. Street Teams almost exclusively operate in urban areas, perpetuating the underserved experience of rural customers. Service Providers reportedly do not deploy Street Teams to rural areas because the return on investment is not as valuable as it is in urban areas or areas with concentrated populations.

c. More waste, fraud, and abuse (WFA)[86] of the LifeLine program has occurred via Street Teams not via customers. Based on WFA reports the two leading causes of WFA incidents are related to "ineligible subscribers" and second "Service Provider and Sales Agent Accountability."[87] For example, a number of investigations have been conducted by the CPUC related to elaborate "fake customer" enrollment schemes, as Street Team members are incentivized by flat rate commissions per sign up. Additionally, multiple stakeholder interviewees and focus group participants described being required to pay cash for "enrollment or reconnection fees" to Street Teams members. Less egregious but highly prevalent were reported incidents of Street Team members not fully disclosing program requirements to customers that resulted in positive outcomes for Street Team members and negative impacts to customers. For example, as referenced above, not informing a customer about the one household rule to secure a sign-up commission, which could later result in the person's discontinuation from the program if a member of their household already receives LifeLine subsidy.

86   *California Government Code Section 53087.6(f)(2)*

87   The most recent report showed 1000 reports of "Ineligible subscribers" and 939 reports of "Service Provider and Sales Agent Accountability."

TABLE 18. Waste, Fraud, and Abuse Counts for Calendar Year 2021.

WFA Type	Count
Ineligible Subscribers	1,000
Oversubscribed Addresses	20
Service Provider and Sales Agent Accountability	939
Exact Duplicates	24
Decreased Subscribers	3
Phantom Subscribers	2
Total	**1,988**

The "ineligible subscribers" in the table above includes cases in which customers who are already enrolled in LifeLine fraudulently attempt to enroll again. However, it also includes customers who unwittingly apply again not knowing they are already enrolled, a circumstance cited repeatedly by stakeholders throughout this Evaluation (e.g., they have a *wireline* LifeLine phone and apply for a *wireless* phone, or do not recognize the Street Teams as a "LifeLine" provider when signing up.) This also includes circumstances in which the Service Provider does not inform the customer that they are ineligible to apply if they are already enrolled in LifeLine, something Service Providers are required to do. Finally, it may also include circumstances in which Service Providers initiate falsified customer information to generate enrollments. The "Service Provider and Sales Agent Accountability" counts includes reports in which the Service Provider commits acts of waste, fraud or abuse that are not otherwise accounted for in the reports.

The Communications Division and the TPA are currently creating procedures to resolve WFA issues. However, it should be noted CPUC does not have authority over a Service Provider's Street Team practices and accountability. CPUC has been reimbursed subsidies provided connected to WFA issues on multiple occasions.

d. The public perception of Street Teams was commonly described by interviewees using these terms: "questionable", "predatory", "aggressive", "shady", "sketchy", "unsafe", and "unprofessional." Certainly, this does not accurately describe the intentions or behavior of all Street Team persons, however this perception is pervasive amongst eligible customers, social services providers, and CBOs, all of whom are necessary partners to create an environment in support of LifeLine.

e. Related to public perception, it was universally reported from every stakeholder group interviewed including Service Providers, that trust and positive relationships are critical factors to secure interest and engagement in the program by eligible customers. Historically, individuals with limited income have experienced a variety of substandard programs and services being marketed to them with promises of improvement to their quality of life.[88] Because of this, many eligible customers are wary of programs and services that seem "too good to be true" (such as free phone service) or of being marketed to by unknown or unvetted sources. It was repeatedly shared that the key to successfully engaging/enrolling eligible customers is to have trusted sources responsible for as many parts of the process as possible (i.e., marketing, eligibility determination, and enrollment). Street Teams were not described as trustworthy by any stakeholder group.

Additional discussion on Street Teams is provided in the *Customer Experience* and *Program Awareness and Community Outreach* Sections of this report. Recommendations specifically related to Street Teams are provided in the Recommendations section.

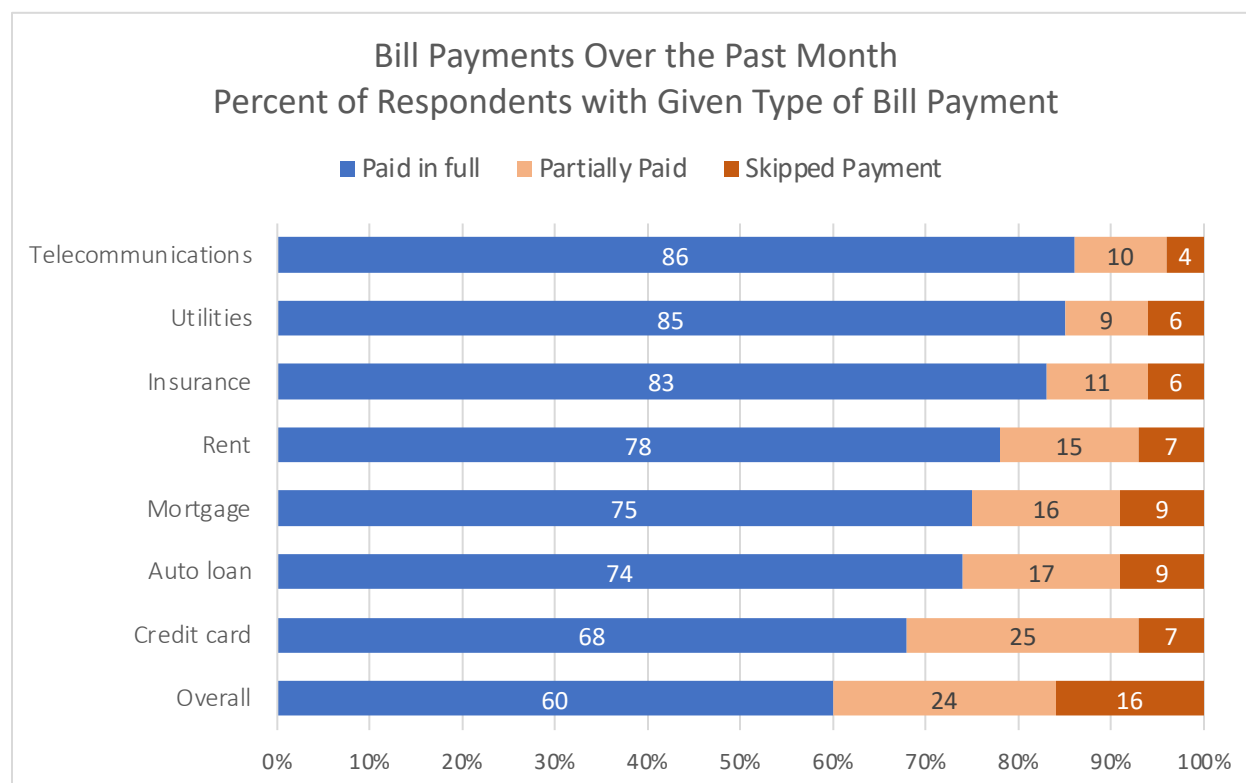88   *https://www.ncbi.nlm.nih.gov/pmc/articles/PMC4487675/*

V. CUSTOMER EXPERIENCE

The following section describes the LifeLine experience for eligible and participating customers.

The Importance of Cell Phones in Current Telecommunication Uses

The LifeLine program was created when telephone services were almost exclusively *wireline* and therefore considered a basic household utility tied to a physical location. The landscape of telecommunications has changed significantly since LifeLine's inception, with *wireless* services taking over the market and smart phones increasingly becoming essential devices. Cell phones have become important *personal* devices that are continuously carried by individuals and serve a variety of purposes. People use their cell phone not only for voice calling, but for text messaging, maps and navigation, exchanging emails, ordering food and other goods, engaging in work and education, accessing important services such as scheduling and attending virtual medical appointments, personal alarms, news, shopping, and for entertainment. Cell phones provide customers an increase in mobility, privacy, and access to services in a manner that *wireline* is unable to replicate.

The necessity for reliable cell phones became even more important if not essential during the height of COVID. For example, a recent study about COVID stimulus payments showed that customers prioritize telecommunications in terms of deciding which bill to pay over all other payment obligations including heat and electricity, illustrating the critical importance of having a functional and reliable phone.[89]

Figure 18. Utilities bill payment trends for June 2020. Figure re-created from McKinsey & Company June 2020 publication: Bill payment trends in the United States.

Bill Payments Over the Past Month
Percent of Respondents with Given Type of Bill Payment

■ Paid in full ■ Partially Paid ■ Skipped Payment

Category	Paid in full	Partially Paid	Skipped Payment
Telecommunications	86	10	4
Utilities	85	9	6
Insurance	83	11	6
Rent	78	15	7
Mortgage	75	16	9
Auto loan	74	17	9
Credit card	68	25	7
Overall	60	24	16

89   https://www.mckinsey.com/industries/financial-services/our-insights/banking-matters/bill-payment-trends-in-the-united-states

A Pew Research Center data collection effort from February 2021 demonstrates 97 percent of Americans have a cell phone, 85 percent of which are smart phone users[90]. The report also highlights the dependency on smartphones for access to broadband, especially among lower income populations. For example, 27 percent of adults with household incomes below $30,000 reported they do not use broadband at home but have online access via their smartphones.
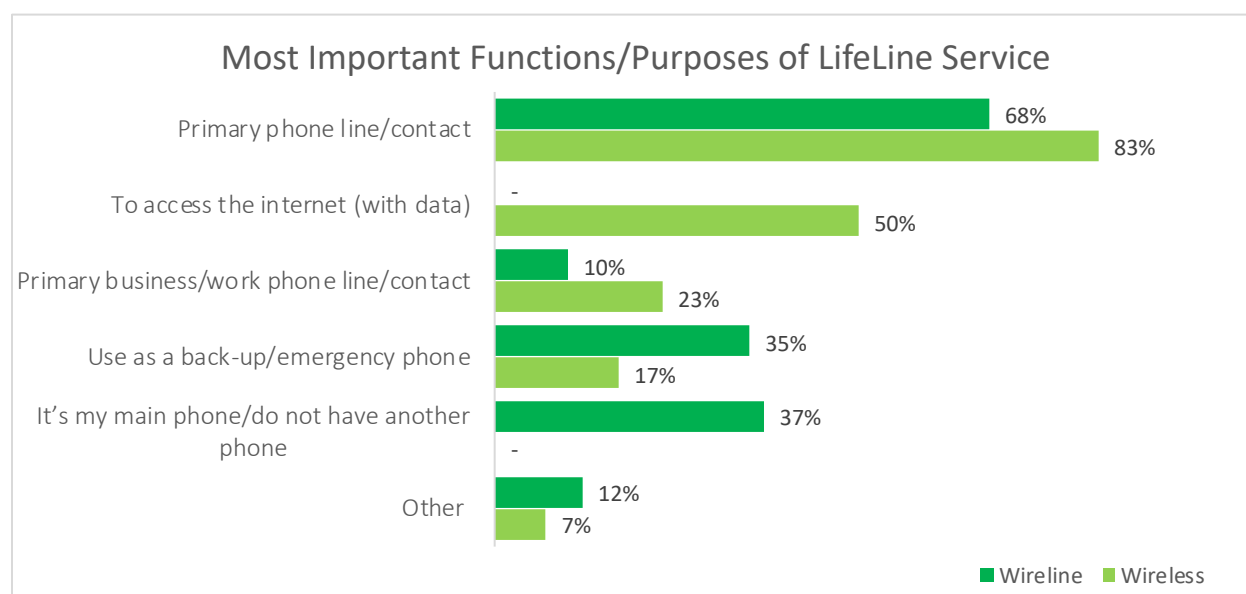
According to an August 2021 Center for Disease Control (CDC) study, the majority of American homes use cell phones exclusively[91]. This is especially true for individuals who live in rented or temporary accommodations. The study also found that 74 percent of adults with household incomes below the federal poverty line were more likely to be *wireless-only* compared to those in higher income households (e.g., 64 percent of adults with household incomes at least twice that of the federal poverty line). While 25 percent of households surveyed have both *wireless* and *wireline* phones, the prevalence of *wireline-only* households has dropped dramatically to about three percent.

Customer Use of Lifeline Services

Reflecting the different demographics of *wireline* and *wireless* customers, respondents from the statewide survey showed variations in the most important functions/purposes of their LifeLine phone service (see Figure 19 below). Most customer groups use their LifeLine phone service as their primary phone line/contact (83 percent of *wireless* and 68 percent of *wireline*) and 37 percent of *wireline* customers note that they have no other phone available. Fifty percent of the *wireless* customers also use their LifeLine service to access the internet.

> **Figure 19**. Description of Purpose and Uses of LifeLine Service by Wireless and Wireline | Statewide Survey, October 2021
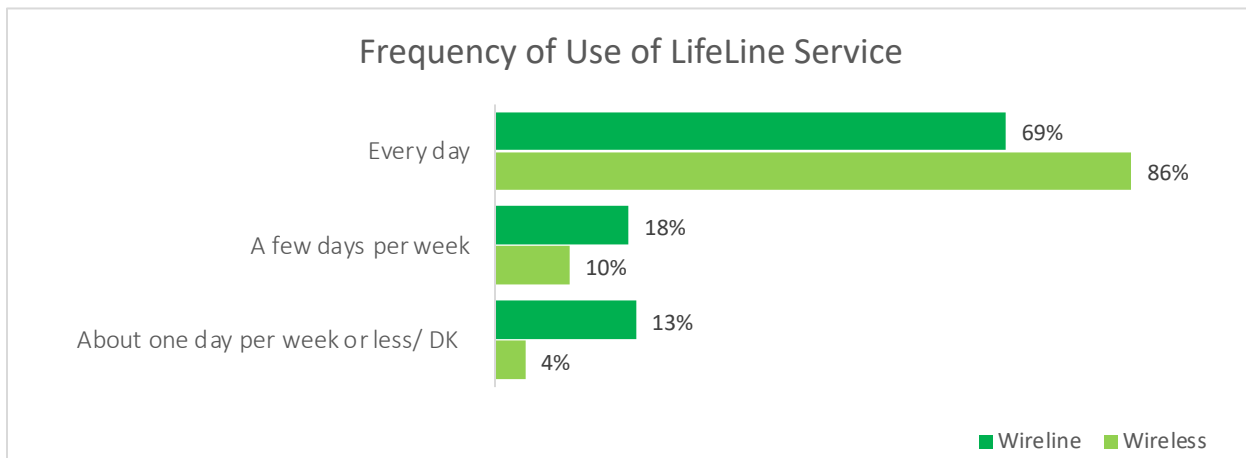
The majority of both *wireless* and *wireline* customers use their LifeLine service at least daily; notably 86 percent of *wireless* customers report using their phone at least daily (see Figure 20 below). Thirty-one percent of *wireline* customers reported that they use their phone less than once a day, reflecting that 35 percent of *wireline* customers also reported that the primary use of their Lifeline service is for back-up.

Most Important Functions/Purposes of LifeLine Service

- Primary phone line/contact — Wireline 68%, Wireless 83%
- To access the internet (with data) — Wireline -, Wireless 50%
- Primary business/work phone line/contact — Wireline 10%, Wireless 23%
- Use as a back-up/emergency phone — Wireline 35%, Wireless 17%
- It's my main phone/do not have another phone — Wireline 37%, Wireless -
- Other — Wireline 12%, Wireless 7%

■ Wireline ■ Wireless

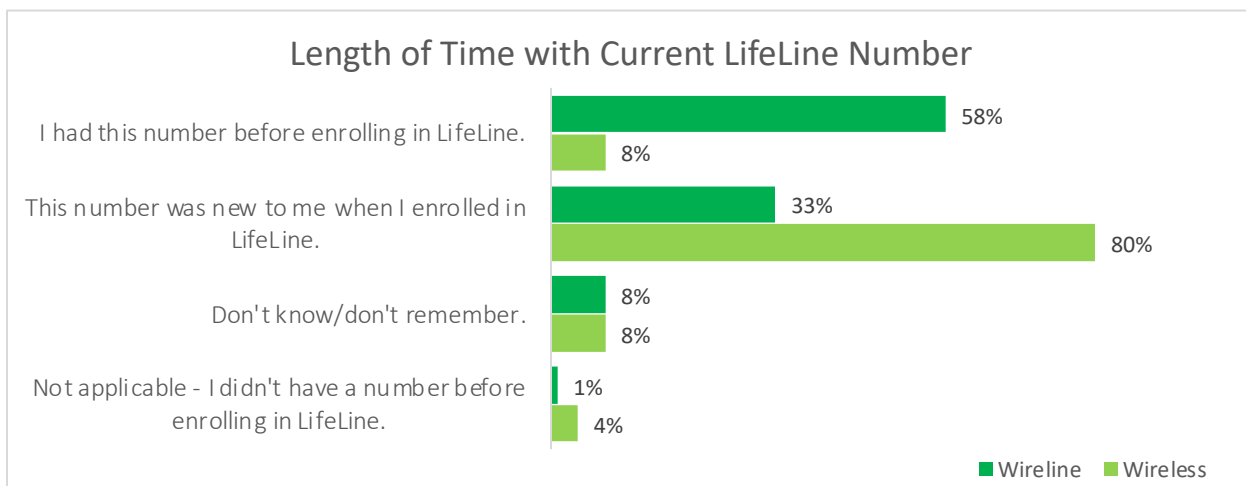90   April 2021. https://www.pewresearch.org/internet/fact-sheet/mobile/

91   Blumberg SJ, Luke JV. *Wireless* substitution: Early release of estimates from the National Health Interview Survey, July-December 2020. National Center for Health Statistics. August 2021. DOI: https://doi.org/10.15620/cdc:108678

Figure 20. Frequency of Customer Use of LifeLine Service by Wireless and Wireline | Statewide Survey, October 2021

Frequency of Use of LifeLine Service

	Wireline	Wireless
Every day	69%	86%
A few days per week	18%	10%
About one day per week or less/ DK	13%	4%

A disincentive to enrolling for LifeLine service that was identified in the focus groups, was the lack of mobility in using their existing phone numbers in their discounted plan (see Figure 21 below). This issue is most prevalent with *wireless* customers, with 80 percent receiving a new phone number when enrolling in LifeLine while only 33 percent of *wireline* customers received a new number upon enrollment.

Figure 21. Length of Time with Current LifeLine Phone Number by Wireless and Wireline | Statewide Survey, October 2021

Length of Time with Current LifeLine Number

	Wireline	Wireless
I had this number before enrolling in LifeLine.	58%	8%
This number was new to me when I enrolled in LifeLine.	33%	80%
Don't know/don't remember.	8%	8%
Not applicable - I didn't have a number before enrolling in LifeLine.	1%	4%

Previously enrolled LifeLine customers responded to the survey online (a total of 242). Twenty-five percent of these respondents did not know why they were no longer enrolled, 20 percent said that their enrollment lapsed and they did not get around to renewing it, 14 percent noted that LifeLine or the Service Provider stopped service, 10 percent gave the reason that the renewal process was too complicated, another 17 percent stated that they did not like the cellphone that was supplied with their LifeLine plan, plan options were too limited, or they were just overall unsatisfied. Respondent comments included:

- "I wanted to keep my own cell phone and cell phone number, but I was given this really small one with a different number and couldn't continue to use my own personal cell phone."
- "I'm with an 'Obama Phone' now. Not sure if I'm still with LifeLine."

- "It got discontinued because I didn't see the renewal. I'm Deaf and was enrolled in the telecommunication for the deaf program as well. It was a great program and really easy to apply. Now I've been trying MONTHS to reapply but it so complicated, so hard. You have to go through [the Service Provider] THEY WILL NOT HELP. By the time I get approved for it, and get the letter, my services are cut off from [the Service Provider] because I can't afford the bill. [The Service Provider] won't give me the discount unless I pay the bill. I pay the bill, and then they transfer me to ten other connections. I've been here one year, I'm deaf and on social security income, and cannot get the EBB or LifeLine."

Individuals who had never been enrolled in LifeLine also completed the online survey (a total of 243) and were asked why they had never enrolled. Fifty-five percent reported that they were not familiar enough with it and 27 percent stated that they did not know why they had never enrolled. Example verbatim comments from those who were never enrolled include:

- "Have not really needed it till now don't want to take advantage of the system."
- "I can't really comprehend. And get frustrated using my phone."
- "I don't have an ID, so I've not been allowed to enroll."
- "I have internet phone. I want lifeline internet help."
- "I have no idea how to apply or where. Spectrum sent me to your site and there's nowhere to apply. I'm very confused."
- "Lifeline is always behind. I guess because they're a free phone."
- "The process is too confusing. It says to apply for Internet but then only gives option for home phones and cell phones."

Administrative Requirements as a Barrier for Enrollment

LifeLine program administrators are tasked with balancing the ease of enrollment/renewal with the stringency of the verification processes, and being mindful of fraudulent, duplicate, or ineligible enrollment risks that occur between these two factors.

Key administrative considerations for LifeLine include the enrollment application process, eligibility verification, and the renewal process. Each of these requirements have been identified as barriers for enrollment in the federal Lifeline and state LifeLine program and other public benefit programs. Research indicates that some customers perceive enrollment as an inconvenience, are uncertain about their eligibility, or simply do not know how to enroll[92]. This Evaluation confirmed these barriers through the stakeholder interviews and focus groups, as well as the statewide survey.

> Historically, the renewal process is more successfully implemented than the enrollment process for *wireline* customers, and the enrollment process is more successfully implemented than the renewal process for *wireless* customers. However, the recently implemented data matching via CalFresh Confirm is expected to allow for automatic verification of customer renewal for *wireless* customers.

The administrative processes for enrollment and renewals for the California LifeLine *wireline* and *wireless* customer base operate differently from each other and are described in greater detail in the *Program Reach and Effectiveness* Section of this Evaluation. Contributing factors for these differences include demographics and technological proficiency between customer groups, and the equipment utilized by the two types of services. Outlined below are specifics related to each administrative process of LifeLine in which there is a customer interface.

92   Dynamics, Opinion. 2019. "2019 California Low-Income Needs Assessment. Final Report: Summary of Key Findings." Portland.

Program Administration for *Wireline* Customers

Wireline customers call or visit a Service Provider storefront to request an application for the LifeLine subsidy or are informed about the program via their Service Provider. *Wireline* customers do not receive 100% subsidy for their service and are accustomed to receiving a monthly bill from their Service Provider. These monthly balances are typically sent by Service Providers via postal mail. Annual renewal forms are also mailed via postal mail to *wireline* customers. This customer base characteristically maintains a consistent home address for an extended period with their income/programmatic eligibility remaining reasonably static (commonly due to a fixed income base) and unlikely to change in the future[93]. In response, the *pink envelope* process has a higher degree of success for *wireline* than *wireless* customers, with a nearly 80 percent success rate [see Table 19 below.]

Several *wireline* Service Providers interviewed described taking extra measures to ensure that *wireline* customers have the necessary information and support to successfully enroll and renew annually, including one-on-one in person meetings with customers to aide in the completion of paperwork. Without the assistance, customers would reportedly not have been able to successfully enroll. If assistance is required for the form to be completed accurately, there is likely a need to improve the simplicity and ease of the application and process. This is discussed in the *Recommendations* Section.

The *wireline* customer demographic is generally older and has less experience and comfort with newer technologies such as smart phones or computers. However, making *wireline* renewal available electronically such as via the pre-emptive recertification through CalFresh Confirm will be beneficial to many *wireline* customers per the reported amount of *wireline* survey respondents who regularly use email, and will contribute to annual cost savings of a large volume of post mail that goes undelivered and/or does not result in renewed enrollment.

In addition to unreturned/non-responsive renewal forms, a difficulty for customers is navigation of the *correctible denials* process. Correctible denials, for both *wireline* and *wireless* customers, cause confusion and are a source of concern/complaint. Confusion occurs when a customer is re-issued the renewal application due to erroneous or missing information, and they are required to complete the entire form again rather than only addressing the issue causing denial. Consequently, some customers make the same, similar, or new mistakes when re-submitting their forms, resulting in a disqualification. Others assume they received a duplicate application in error and disregarded it. This is especially problematic given the current rule of only allowing one correctable denial.

According to the Renewals Working Group (RWG) report[94], correctable denials were sent to 7.5% of *wireline* customers going through the renewal process, and of those, 9.5% of the *wireline* customers had correctable denials returned and denied. While the RWG acknowledged that the correctable denial notifications represent a relatively small proportion of the overall customer base, the resources needed to modify the process appear to be minimal, can have a disproportionately positive impact on low-income customers, and is likely easier to address than non-response to mailed forms.

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93   Statewide LifeLine Customer Survey, October 2021.

94   LifeLine Renewal Working Group. Final Proposal for Improving the Renewal Process, February 5, 2021
      https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M366/K583/366583872.PDF

TABLE 19. Correctable Denial Counts During the 2020 Renewal Process

Measure	Wireless Count	Wireless %	Wireline Count	Wireline %	Total Program Counts	Program %
Renewal Forms Sent Out	1,227,432	79.7%	311,798	20.3%	1,539,230	100%
Successful Renewals	343,714	28.0%	225,941	72.5%	569,655	37.0%
Correctable Denials Sent	**24,523**	**2.0%**	**23,294**	**7.5%**	**47,817**	**3.1%**
Correctable Denials Returned and Approved	6,396	26.1%	8,632	37.1%	15,028	31.4%
Correctable Denials Returned and Denied	3,529	14.4%	2,208	9.5%	5,737	12.0%
Correctable Denials Unreturned and Denied	14,598	59.5%	12,454	53.5%	27,052	56.6%
Total Successful Renewals	**350,110**	**28.5%**	**234,573**	**75.2%**	**584,683**	**38.0%**

Table reproduced from RWG Report. Data derived from October 23, 2020 Staff/TPA response to RWG Request. 2020 data points must be considered with respect to the COVID-related renewals freeze.

Program Administration for *Wireless* Customers

In contrast to the *wireline* customer population, as previously noted, the way most *wireless* customers enroll in LifeLine is via Street Team interactions. New customers can presumptively enroll with a Service Provider while their eligibility is verified, and the majority receive a cellular device immediately during that exchange.

While customers are required to provide an address for enrollment, the nature of the device itself is mobile, and not physically connected to an address. *Wireless* customers tend to be more transient than *wireline* customers, moving residences one or more times within a year. For example, statewide survey responses show 27 percent of *wireless* customers have lived at their current residence two years or less and six percent do not currently have a permanent place to live. Likewise, 48 percent report that they receive their mail somewhere aside from where they currently reside[95]. These factors make the current *pink envelope* renewals process of mailing paperwork to an address unlikely to succeed for *wireless* customers. Table 19 above shows a 28 percent success rate for *wireless* renewal form completion in 2020.

Digital methods for *wireless* enrollment described previously and expanded upon in the next subsection, are more successful. *Wireless* customers in particular benefit from a digital enrollment process that can occur via text, online through the CPUC website, via an application portal on Service Providers' websites, or email communications.

None of the current *wireless* customer focus group participants were able to describe how they renewed their LifeLine services. None expressed awareness of the *pink envelope* and therefore had no feedback to offer on what was successful about the process, or what could be improved. None described receiving a text message with a renewal link from the TPA/ Service Provider. This feedback may corroborate the *wireless* enrollment "churn" described in a previous section of this report in which *wireless* program customers are transferring between *wireless* Service Providers at high rates and rather than renewing enrollment, and existing or past *wireless* customers are submitting new enrollment paperwork. Some inability of focus group participants to describe their experience with the renewal process may be due to the renewal freeze implemented during COVID, though many participants have been LifeLine customers for several years prior to the pandemic.

When asked in the statewide survey about specific improvements that could be made to the LifeLine program, about 1 in 5 customers notes that they would like to see "enrollment and/or renewal process made easier or less confusing" (22 percent of *wireless* and 19 percent of *wireline* current customers). It cannot be stated definitively why the percentage of respondents wanting improvements in these areas is relatively small given what the CPUC, CAB, TPA and advocates have continuously heard about problems with the renewal process, except that it may confirm that the *wireline* process is more-or-less working with the exceptions noted above, and that the *wireless* population has very little to offer on the renewal process since they appear to be largely unaware of it.

Recent Improvements to Renewals Process

CPUC identified the improvements to the renewals process as a priority in 2020[96]. The LifeLine Renewals Working Group was established in April 2020, pursuant to the Assigned Commissioner's Scoping Memo and Ruling order to review the current LifeLine Program renewal process and evaluate strategies and initiatives to improve the process. An Order Instituting Rulemaking (OIR)for renewal process improvement was filed on February 5, 2021[97] by Commissioner Shiroma/CPUC. Five recommendations were presented. They are:

1. Allow for third-party access to qualifying program databases for automatic renewal
2. Improve the web enrolment system online renewal portal
3. Increase communications between the TPA and customers
4. Modify the *correctable denials* process
5. Modify the TPA-implemented *bad address* process

The Communications Division reports that progress has been made on each of these recommendations[98]. Most notably, in reference to the first recommendation above, is the establishment of the CalFresh Confirm solution to verify active CalFresh enrollment, and thereby, eligibility for LifeLine. Access to CalFresh Confirm allows the TPA to automate the verification of LifeLine program eligibility for existing subscribers whose renewal windows are starting. The integration with CalFresh Confirm, deployed on November 12, 2021, includes functionality for the TPA's form reviewers to perform on-demand CalFresh Confirm eligibility checks. In December 2021, the TPA's form reviewers began performing on-demand CalFresh Confirm eligibility checks for all new customers as well.

Associated recommendations provided in the last section of this report largely align with and support the work of the Renewals Working Group and the Communications Division Staff.

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96   Assigned Commissioner's Scoping Memo and Ruling, April 13, 2020, October 21, 2020, and November 20, 2020.
     https://docs.cpuc.ca.gov/SearchRes.aspx?DocFormat=ALL&DocID=332175052

97   *366583872.PDF (ca.gov)*

98   R.20-02-008 (CA LifeLine): Ruling regarding staff recommendations for renewals improvements. And, Staff Analysis and Proposed Actions Regarding the California
     LifeLine Renewal Working Group Proposal and Assembly Bill 74, December 2021 *https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M431/K807/431807365.PDF*

Customer Experience with Phone Service Providers Offering LifeLine Phone Plans

Focus group discussions with enrolled and eligible customers were conducted to obtain feedback about the plans, devices and customer service offered by various LifeLine Service Providers. Attempts to obtain comparison on quality of device and service across Service Providers as part of these focus group discussions was unsuccessful. All customers except for one individual were not aware they had a choice in Service Provider should they desire different devices or plans. Focus group participants and some stakeholders interviewed expressed the general sentiment that free devices offered by Service Providers as part of their LifeLine service are considered "poor quality" or "cheap," and that *wireless* coverage is "spotty" and inconsistent with a high frequency of dropped calls.

Despite the feedback regarding the quality of the devices and service, focus group participants were generally happy to have a free device, especially those who were in particularly desperate situations such as individuals leaving abusive relationships, and those who are unhoused. These participants described the free device as "a lifesaver." The statewide survey also found that 75 percent of respondents were satisfied with their service[99]. One focus group participant may have aptly captured this incongruous sentiment with the following statement: "Who can complain about a free phone?"

> Many focus group participants and statewide survey respondents reported having another paid device in addition to their LifeLine phone and considered the paid device better than the LifeLine device and service.

While customers generally expressed satisfaction with the LifeLine experience, many focus group participants and statewide survey respondents reported having another paid device in addition to their LifeLine phone and considered the paid device better than the LifeLine device and service for a variety of reasons.

This finding indicates that while the LifeLine program does appear to be reaching some of the population in need, the quality of the device and service do not appear to be at a threshold in which they meet customer expectations. Customer need and the quality of devices are misaligned enough that eligible customers are willing to pay market rate prices for a phone and service, while also subscribing to LifeLine.

> Customer need and the quality of devices are misaligned enough that eligible customers are willing to pay market rate prices for a phone and service, while also subscribing to LifeLine.

Some focus group participants described LifeLine devices as a somewhat useful supplement to their existing phone service. However, there is a population of customers who are in such desperate need that market rate options are not accessible to them. This relates to a repeatedly expressed view by numerous stakeholders interviewed that the poor quality of devices, combined with the way LifeLine is implemented, facilitates a public perception of LifeLine being a subsidy program of low quality and importance.

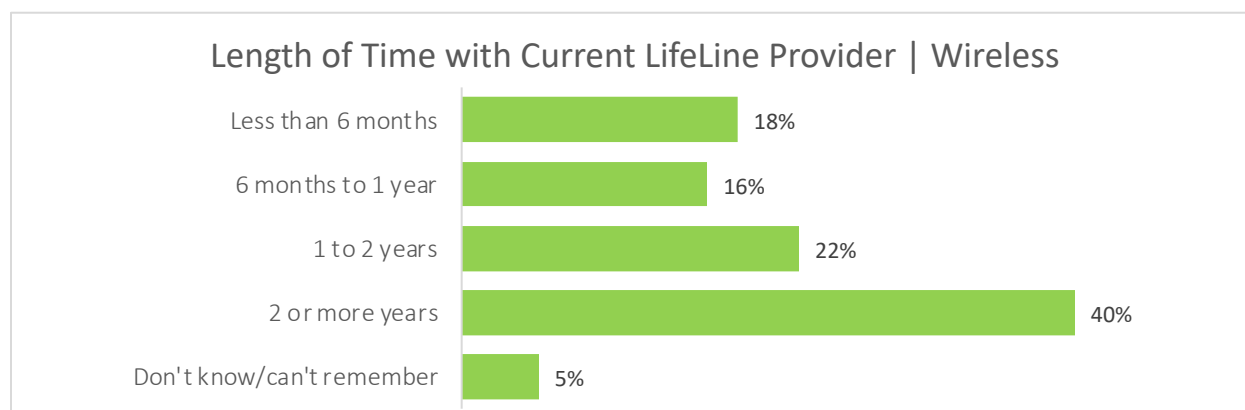A recent article[100] on the federal Lifeline program verifies many of the sentiments described above:

> "Families who rely on Lifeline say they have struggled to talk to their doctors, employers and loved ones throughout the pandemic, illustrating how significant technical shortcomings, and years of government neglect, have undermined a critical aid program at a time when it is needed most.
>
> Many Lifeline customers are stuck with service so subpar that it would be unrecognizable to most app-loving, data-hungry smartphone users, according to interviews with more than two dozen customers and policy experts, including members of Congress, Biden administration officials, state regulators, telecom executives and public-interest advocates. The program's inadequacies are so great that even those who are eligible for help often turn it down: More than 33 million households are eligible to receive Lifeline support, yet only 1 in 4 of these Americans actually takes advantage of it, according to U.S. government estimates prepared in October[101]."

Service Providers, CBOs and customer advocates interviewed reported that eligible customers describe choosing to pay market rate prices for a plan and device in order to ensure reliability and consistency, even if that means foregoing bill payment or failing to meet other basic needs in their lives. This pattern of decision making is confirmed in recent research[102] indicating that amongst all payment obligations, customers chose to forgo paying telephone service last [see Figure 18, above].

Current LifeLine customers tend to have been with their *wireless* Service Provider for a shorter amount of time as compared to *wireline* customers (see Figure 22 below). For example, 34 percent have been with their *wireless* Service Provider for less than a year.

Figure 22. Wireless Customer Length with Current LifeLine Provider | Statewide Survey, October 2021

Length of Time with Current LifeLine Provider | Wireless

- Less than 6 months: 18%
- 6 months to 1 year: 16%
- 1 to 2 years: 22%
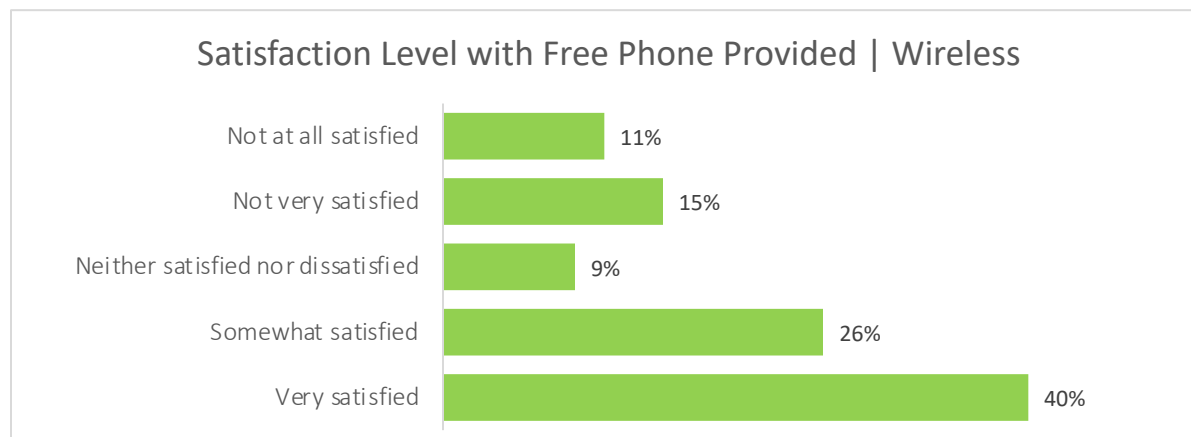- 2 or more years: 40%
- Don't know/can't remember: 5%

Sixty-eight percent reported that the cell phone they were using was provided free when they enrolled in LifeLine. Sixty-six percent of survey respondents with free phones reporting being 'very' or 'somewhat' satisfied with their phones, and 26 percent were 'not at all' or 'not very satisfied' with their LifeLine phone (see Figure 23 below).

100 https://www.washingtonpost.com/technology/2021/02/09/lifeline-broadband-internet-fcc-coronavirus/

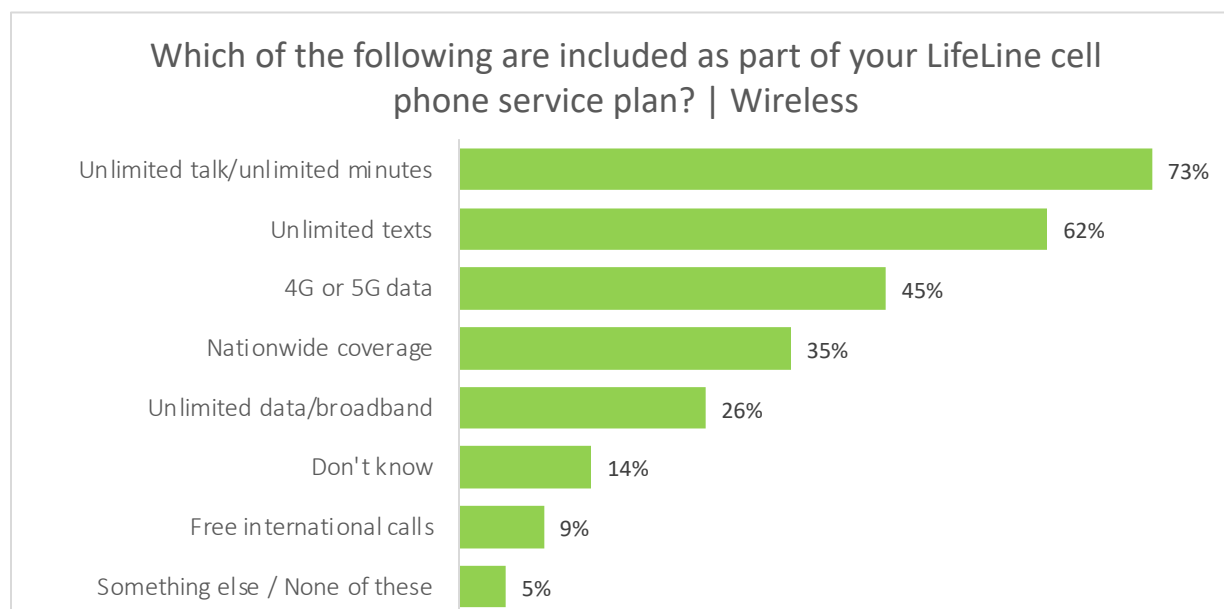101 https://www.usac.org/lifeline/resources/program-data/

102 https://www.mckinsey.com/industries/financial-services/our-insights/banking-matters/bill-payment-trends-in-the-united-states

Figure 23. Wireless Customer Satisfaction Level with Free Phone Provided | Statewide Survey, October 2021

Satisfaction Level with Free Phone Provided | Wireless

Level	Percentage
Not at all satisfied	11%
Not very satisfied	15%
Neither satisfied nor dissatisfied	9%
Somewhat satisfied	26%
Very satisfied	40%

In terms of the LifeLine *wireless* plans statewide survey respondents were enrolled in, 73 percent had unlimited talk and 62 percent had unlimited texts (see Figure 24 below). Forty-five percent had 4G or 5G data and 26 percent had unlimited data[103].

Figure 24. Features of Wireless Lifeline Plans | Statewide Survey, October 2021

Which of the following are included as part of your LifeLine cell phone service plan? | Wireless

Feature	Percentage
Unlimited talk/unlimited minutes	73%
Unlimited texts	62%
4G or 5G data	45%
Nationwide coverage	35%
Unlimited data/broadband	26%
Don't know	14%
Free international calls	9%
Something else / None of these	5%

When asked to rate their overall satisfaction with their current *wireless* LifeLine provider, a total of 75 percent of the *wireless* customers reported that they were satisfied with their services.

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103   Service offering requirements will be updated in January 2022.

Figure 25. LifeLine Customer Satisfaction Level with Overall Wireless Service | Statewide Survey, October 2021

Satisfaction Level with Overall LifeLine Service

Not at all satisfied	4%
Not very satisfied	8%
Neither satisfied nor dissatisfied	13%
Somewhat satisfied	29%
Very satisfied	46%
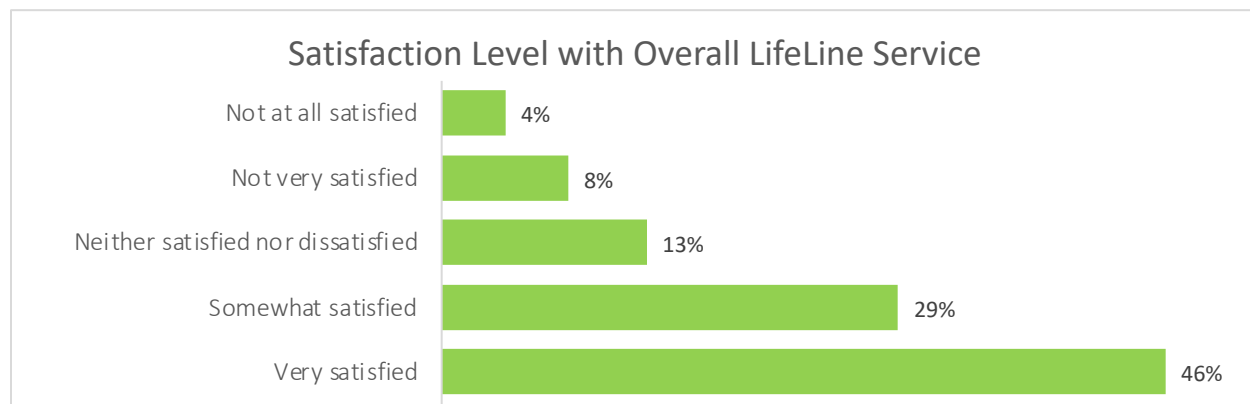
When asked to rate different aspects of the LifeLine *wireless* services from poor (1) to excellent (5), the quality and type of phones had the lowest ratings (2.8 and 2.9 respectively). The overall value/savings of the *wireless* plans (4.0) and the amount of minutes (4.1) were rated the highest.

Figure 26. Customer Ratings of LifeLine Wireless Program Elements | Statewide Survey, October 2021

Rating of Wireless Program Elements
1= Poor; 5 = Excellent

Amount of minutes included in the plan	4.1
Overall value/savings	4.0
Customer service	3.6
Overall service coverage area	3.4
The availability of family plans	3.4
Amount of data included in the plan	3.3
Speed of broadband included in the plan	3.0
Type of phone included in plan	2.9
Quality of the phone included in the plan	2.8
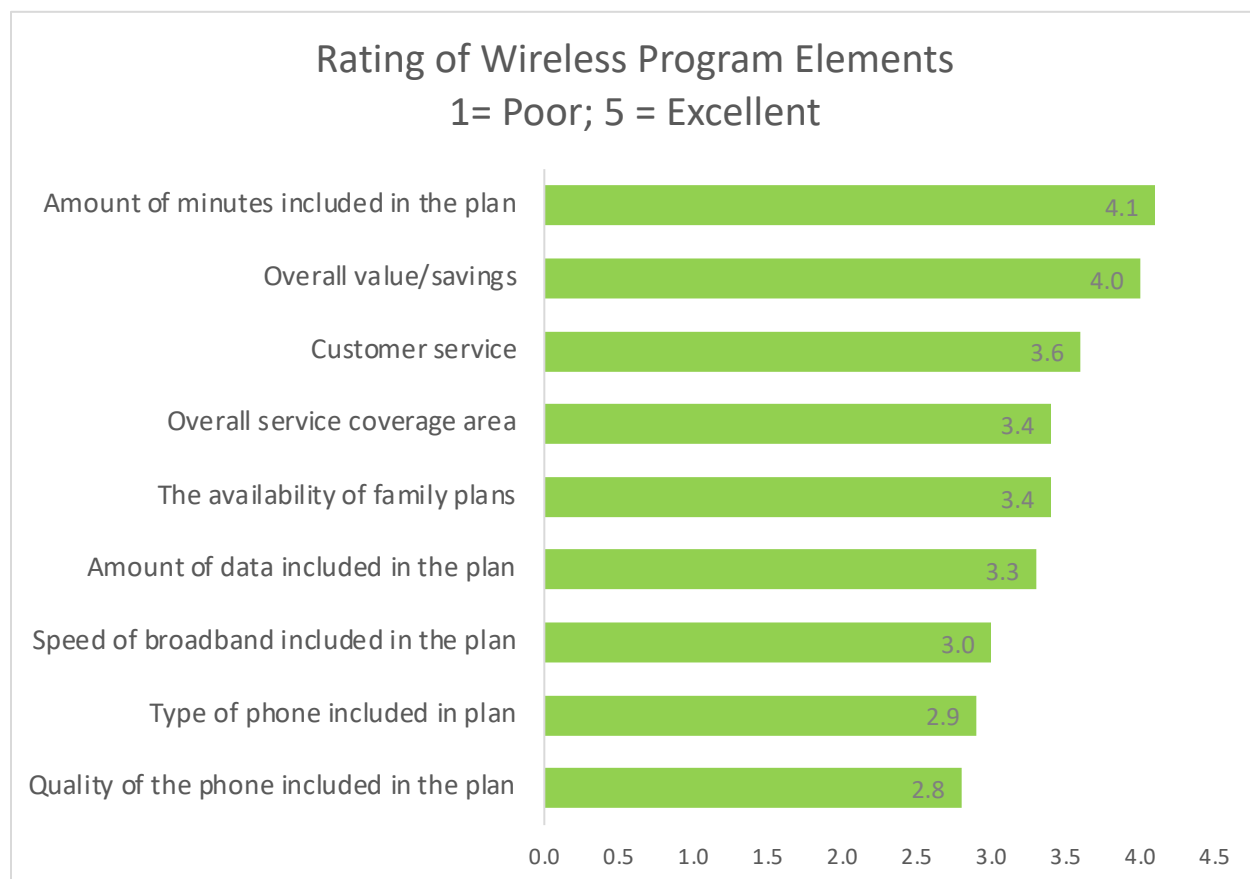
Despite 66 percent of respondents expressing that they were generally satisfied with their phones, when asked about the top three improvements that could be made to their LifeLine cell phone service, a larger number (68 percent) reported a desire that a better phone be included with the plan. Thirty-six percent also wanted improved coverage. Other desired improvements include better service plan options (25 percent) and better customer service (21 percent). It is also important to distinguish between satisfaction with a device and satisfaction with the customer experience. If eligible customers do not encounter a positive customer experience, they are less likely to enroll in the program and therefore respond to the survey thus resulting in a response bias. It is also important to note that most of these respondents have been enrolled for less than a year which may not give them adequate time to fully assess the program.

Figure 27. Customers' Desired Improvements to LifeLine Wireless Services | Statewide Survey, October 2021

Top Three improvements to your LifeLine cell phone service that you would like to see | Wireless

Better phone included with the plan	68%
Better coverage	36%
Better service plan options	25%
Make the enrollment and/or re-enrollment process easier or less confusing	22%
Something else	22%
Better customer service	21%
Better savings	7%
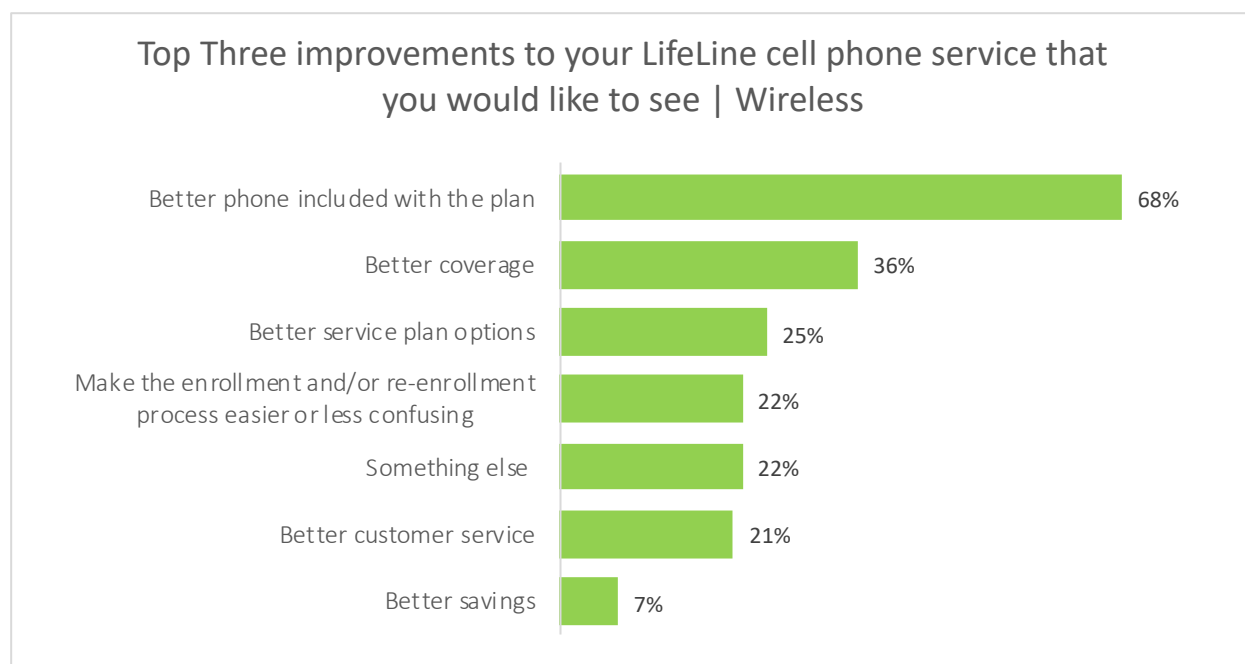
Satisfaction with *Wireless* Service Providers

Based on *wireless* respondents to the statewide survey, sentiments reflect customers are generally satisfied with their phone and their *wireless* providers, with an average rating for all providers being 3.7 for phones and 4.1 for providers (with 1 being 'not at all satisfied' and 5 being 'very satisfied'). However, many of these same customers also equally desire improved phones and coverage.

Satisfaction Levels of Current Wireless Customers
Free Phone &Overall Provider Service

■ PHONE   ■ PROVIDER

Provider	Phone	Provider
Average of All Providers	3.7	4.1
Access Wireless (iWireless)	4.0	4.2
American Broadband and Telecommunications	3.9	3.8
Assurance Wireless by Virgin Mobile	3.7	4.1
enTouch Wireless (Boomerang Wireless)	3.7	3.5
Feel Safe Wireless (AirVoice Wireless)	3.4	4.1
Life Wireless (Telrite)	3.9	4.2
SafetyNet Wireless (Amerimex)	3.5	3.9
SafeLink (TracFone)	3.8	4.1
Standup Wireless (Global Connection)	3.6	4.1
Tag Mobile	3.3	4.1
TruConnect (TelScape Communications)	3.6	4.0
Some other provider	3.7	3.8
Don't know provider	3.7	3.9

Focus group participants and stakeholder interviews provided a different perspective. Stakeholders described a disparity in the customer experience for individuals entering a brick-and-mortar store who are greeted by multiple customer service representatives donning uniforms in a clean and professional environment, versus the experience of, in some cases, being aggressively pursued

on a street corner by a Street Team member with no identifying uniform who is handing out free phones from a tent. The difference between the two experiences was described by one individual as reinforcing the perception that "poor people aren't valued" and that "if the state cared about individuals with low-income gaining access to a needed service, they would improve the customer experience and the quality of the program."

As previously noted, advocates and CBOs serving the target population stated[104] "program customers should not be forced to accept lesser-quality service or poor customer service merely because the service is discounted, but customers must also be offered more than a small discount on expensive full-rate plans."

This theme is elaborated on in more detail in the *Program Awareness and Community Outreach* Section.

Customer Experience with *Wireline* Services and Service Providers

In contrast to LifeLine *wireless* customers, 70 percent of *wireline* customer statewide survey respondents reported that they have been with their *wireline* Service Provider for five years or more. In terms of their Lifeline *wireline* plan, 43 percent have long distance service, 42 percent have voicemail service, and 39 percent have caller waiting/ID. Nineteen percent report that their *wireline* plan does not have any features.

LifeLine customers rating of the overall quality of their *wireline* service was high, with 53 percent reporting that it was "excellent" or "very good." Another 32 percent rated the service as "good" and 15 percent felt that it was "fair" or "poor." Survey respondents were asked to identify improvements they would like to see to their *wireline* plans and 48 percent desire better savings, 30 percent desire better phone features, and 28 percent desire better phone line quality. Other suggested improvements survey respondents provided include:

- Allow for a paperless option (via email) when renewing or verifying eligibility
- Provide better communication/outreach on LifeLine's behalf with its customers
- Make it easier to verify eligibility for the program
- Make LifeLine's website easier to navigate
- Avoid a yearly renewal process and use an online version of renewal.

Figure 29. LifeLine Wireline Customer Length of Time with Provider | Statewide Survey, October 2021

Length of Time with Current LifeLine Provider | Wireline

1 year or less	5%
1 to 5 years	20%
5 to 10 years	21%
10 years or longer	49%
Don't know/can't recall	4%
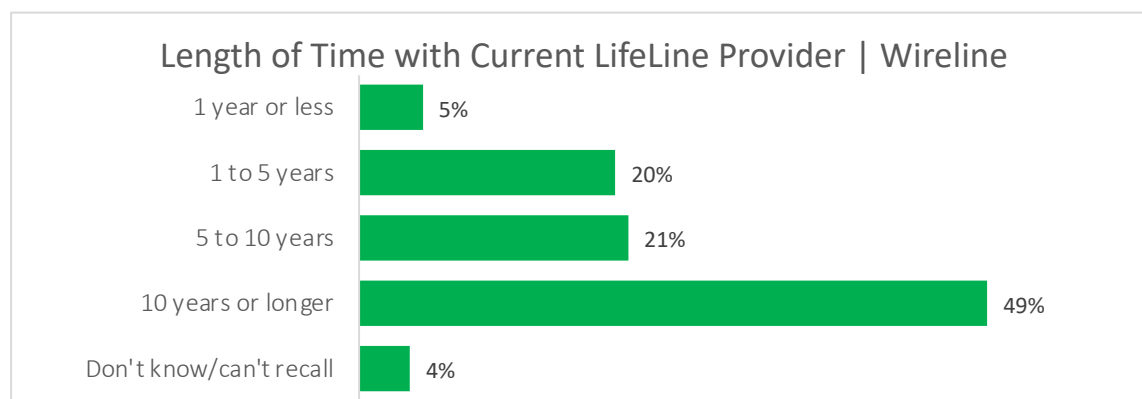
104   Opening Comments of Center For Accessible Technology, The Greenlining Institute, And The Utility Reform Network on the Ruling Requesting Comments on the Workshop and Lifeline Pilot Programs, September 2018.

Figure 30. Features Included in LifeLine Wireline Service Plan | Statewide Survey, October 2021

Features Included in LifeLine Service Plan | Wireline

Feature	Percentage
Long distance service	43%
Voicemail	42%
Caller waiting/caller ID	39%
None of these	19%
Call forwarding	14%
Something else	10%
Don't know	9%
Free international calls	8%
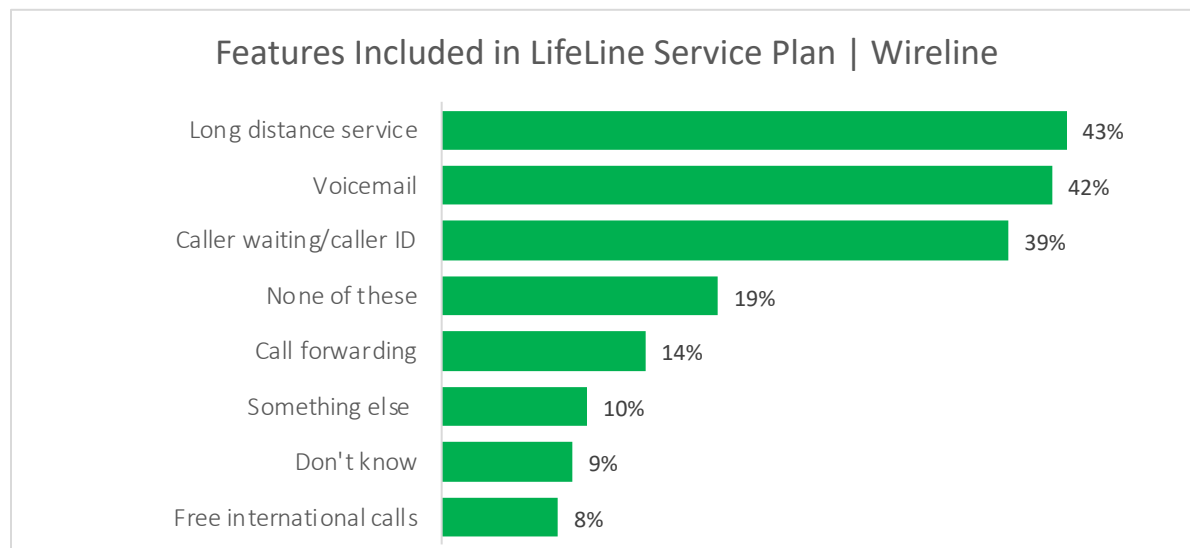
Figure 31. Top Three Improvements Identified by Customers for LifeLine Wireline Service Plan | Statewide Survey, October 2021

Top Three Improvements Desired for LifeLine Service | Wireline

Improvement	Percentage
Better savings	48%
Better phone features available	30%
Better phone line quality	28%
Something else	24%
Better service plan options	21%
Make the enrollment and/or re-enrollment process easier or less confusing	19%
Better customer service	14%
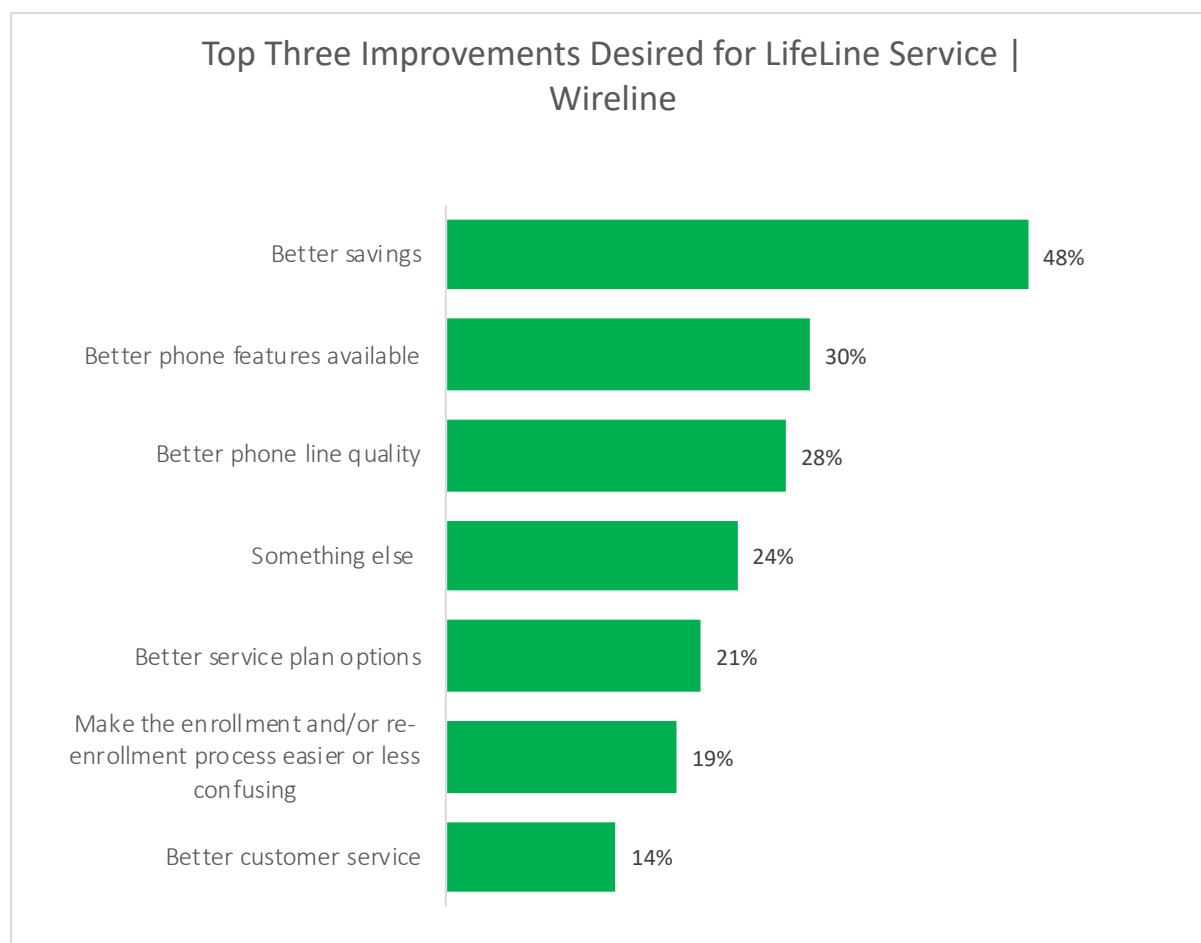
Customer Satisfaction with Wireline Providers

- Overall quality of service
- Overall value/savings
- The availability of family plans
- Customer service

All Wireline Providers
- 3.7
- 3.7
- 3.7
- 3.6

Spectrum
- 3.9
- 3.7
- 3.2
- 3.8

Ponderosa
- 4.0
- 4.2
- 4.5
- 4.4

Frontier
- 3.2
- 3.4
- 3.2
- 2.9

Cox
- 4.1
- 3.8
- 4.4
- 4.0

Assurance
- 3.7
- 4.2
- 4.0
- 3.2

ATT
- 3.7
- 3.7
- 3.7
- 3.6

Other
- 3.9
- 3.9
- 3.7
- 3.8

x-axis: 0.0 0.5 1.0 1.5 2.0 2.5 3.0 3.5 4.0 4.5 5.0
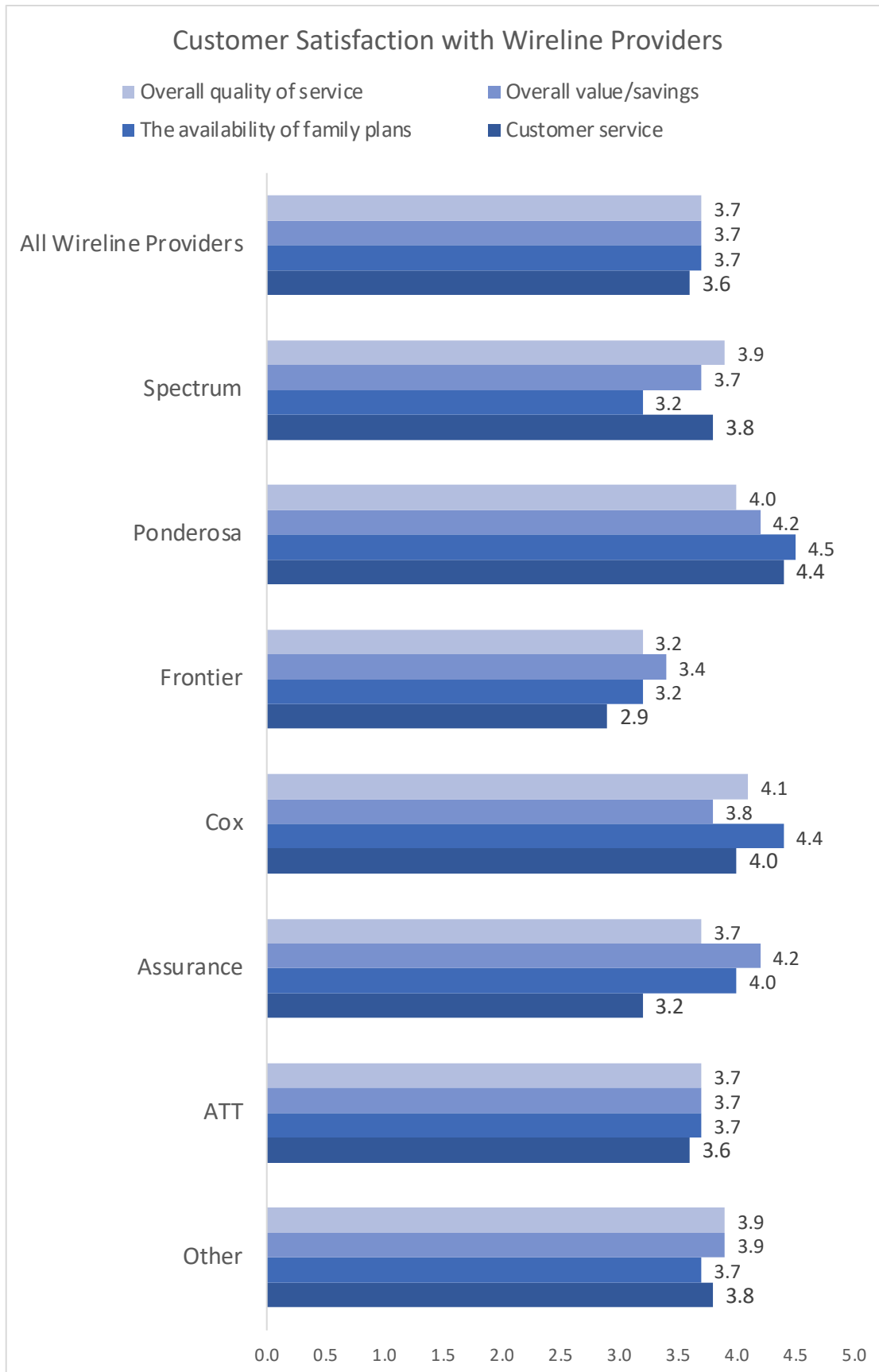
VI. PROGRAM AWARENESS, MARKETING & COMMUNITY OUTREACH

Importance of Awareness and Community Outreach

Studies have consistently shown that the most common reason that qualified households and individuals do not participate in social service programs such as LifeLine is because they are not aware of the program[105]. As is the case with government assistance programs in general, eligible households and in particular, households in more rural areas may lack social networks where the benefits of programs such as LifeLine are openly discussed[106]. Eligible households that do know about LifeLine may still be hesitant to sign-up because they lack understanding of eligibility and benefit information[107] or have a general distrust of programs they are not familiar with[108].

Lack of program awareness has been a longstanding issue for LifeLine at both the state and federal level, confirmed by the most recent 2021 Government Accountability Office (GAO) report[109] on Lifeline stating that program administrators should continue working to improve customer awareness and experience. This Evaluation identifies several areas in which California LifeLine program awareness can be improved, as well as partners willing to support those efforts.

Consistent with the research and the GAO report, the lack of program awareness was a prominent theme identified via Evaluation data collection efforts. The specific issues related to LifeLine awareness are divided here into two categories: general name recognition of the "LifeLine" program, and the inconsistent marketing, outreach, and branding approaches used by Service Providers.

> Among focus group participants, stakeholders interviewed, and statewide survey respondents, apart from those who have a role in the administration or implementation of the program, the name "LifeLine" was generally unrecognized.

Regarding name recognition, among focus group participants, stakeholders interviewed, and statewide survey respondents, apart from those who have a role in the administration or implementation of the program, the name "LifeLine" was generally unrecognized. Many persons described familiarity with the term "Obama Phone" but many of those individuals were not aware that LifeLine and "Obama Phone" are synonymous. This gives the distinct impression that "LifeLine" is not standing out in the telecommunications marketplace, nor is there name recognition presence within the social services community or among CBOs who are poised to be a key source of referrals for the eligible customers.

Secondly, as individual Service Providers assume responsibility for their own marketing, there is no consistent branding or marketing approach in which the title "LifeLine" is disseminated to eligible customers or other referral sources who can help increase enrollment (i.e., other benefits programs or CBO partners.)

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105   Dynamics 2019, Brown and Jamison 2005; Hauge, Jamison and Jewell 2008.

106   Jayakar and Park 2019

107   Remler and Glied, 2003

108   Brown and Jamison, 2005

109   Telecommunications: FCC Has Implemented the Lifeline National Verifier but Should Improve Consumer Awareness and Experience. US Government Accountability Office: GAO-21-235. January 29, 2021. Accessed 12.13.21 *https://www.gao.gov/products/gao-21-235*

> Name recognition supported by program promotion consistency will lead customers to accurate sources of information about the LifeLine program, help to establish program credibility, and stimulate increased enrollment.

Name recognition supported by effective program branding and promotion consistency has been proven to be a successful combination of methods to direct social services customers to accurate sources of information and increased engagement with such programs.[110]

No Common Branding or Messaging about LifeLine in the State or among Service Providers

Per feedback received from stakeholder interviews and the Service Provider survey, eligible *wireline* customers are generally informed of the LifeLine plans via notifications included with their phone bills. Eligible *wireless* customers are generally informed via Street Team[111] interactions. Few customers learn of the LifeLine program via information shared on CPUC's or a Service Provider's website.

CPUC does not currently engage in any marketing or program outreach outside of their website[112]. Despite a history of requests by Communications Division staff, the legislature has not allocated funding for marketing. The CPUC website interface as a marketing tool is expanded upon below, and its functionality in the enrollment/renewal process is considered in both the Program Operations and Implementation as well as the Customer Experience sections of this report.

Service Providers conduct outreach and advertising for California LifeLine plans via their own strategies. CPUC has defined minimal requirements for Service Providers to abide by regarding the marketing and promotion of LifeLine. The language specific to these requirements[113] in the resolutions authorizing a Service Provider as a California LifeLine Provider reads:

> *Service Providers must submit their marketing materials, including scripts to the Communications Division for review and approval prior to dissemination and/or availability to the public.*

However, the Communications Division does not currently have staff resources to approve, monitor, and regulate to what extent those requirements are being met. At present, the process includes receiving and approving marketing materials submitted by Service Providers. Service Providers who choose to develop LifeLine-related marketing materials do so in a manner that is within their budgetary constraints and is beneficial to their business. With no unified marketing and branding features, this results in significant variation across the Service Providers. Based on stakeholder and focus group feedback, individual Service Providers assuming responsibility for their own marketing appears to be a significant contributor to the lack of recognition of the program by eligible customers. In addition, CPUC does not require Service Provider marketing and outreach reporting, nor does CPUC have oversight capability for Service Provider advertising and outreach.

A review of a sampling of participating Service Provider marketing and outreach methods is summarized in the following paragraphs.

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110   *https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5750935/*

111   Street Teams are discussed in detail in the Customer Experience section of this report.

112   *https://www.californialifeline.com/en*

113   D.14-01-036, D.20-10-006, Public Utilities Code § 876, and 47 C.F.R. § 54.405(c)

Larger Service Providers with respectively larger customer base and marketing budgets appear to invest more resources in materials and outreach. Of the Service Providers that do market the program, some do not use the term "LifeLine" prominently in their materials, or at all outside of the fine print. Rather catch phrases such as "free phone" or "free cell phone to qualified individuals" are more commonly seen. References to the CPUC on Service Providers' marketing materials are scarce. Furthermore, materials are translated to a limited extent, with translation to Spanish being the most common. Larger Service Providers may also have the benefit of name brand recognition among eligible populations, limiting their need to specifically advertise LifeLine offerings to solicit enrollment.

Smaller Service Providers with LifeLine customers making up only a fraction of their customer base may not market the program at all due to a lack of financial or staff resources, or the inability to justify the expense when financial resources could be used to improve customer experience in other ways. Stakeholder and focus group responses confirmed that rural markets are under-accessed and subsequently underserved because the return on investment is poor.

Numerous Service Providers interviewed and surveyed requested assistance from CPUC to reach eligible low-income customers that do not know about the program. Availability of marketing materials was also a consistent request from County Social Services and CBO stakeholders to distribute or to have available for clients. In addition, CPUC endorsed outreach materials could be utilized to reduce customer confusion with regards to the enrollment process and application requirements, and therefore increase overall enrollment rates.

The stakeholder, focus group and survey responses strongly indicate a professionally designed and implemented marketing strategy inclusive of consistent branding, messaging, and graphics for the LifeLine program is both needed and desired.

Improvements Underway to CPUC LifeLine Website Interface

A website is an essential tool to create a positive customer experience, market a program, service or product, provide accessible information to and engage with a target demographic.[114] A review of the CPUC LifeLine website shows some notable improvements from its previous version but the site remains text-heavy, challenging to navigate, not eye-catching in narrative or graphics, and the content provided is only partially directed to the eligible LifeLine customer. Accessibility features were not tested, but lack of accessibility of CPUC web interfaces was noted in several stakeholder interviews and focus group conversations. This issue has been under discussion by the CPUC and stakeholder groups for several years. Several organizations interviewed recalled submitting formal comments on this issue and recommendations for website improvements to CPUC since 2018.

See Appendix E for a summary of findings related to a review of the CPUC LifeLine website, and a more thorough assessment and comparison of Service Provider websites as it relates to LifeLine marketing and outreach.

Through interviews, Communications Division staff expressed the need to enhance the website interface and to improve customer experience. As a result, the Communications Division engaged the TPA to institute a variety of improvements throughout 2021 with several more planned for 2022. A list of the recent and planned improvements was provided to the Evaluation Team on December 16, 2021, and many were found to be consistent with this Evaluation's recommendations. A summary of website as well as other current and planned program improvements provided by the Communications Division is found in Appendix F.

114   https://www.forbes.com/sites/theyec/2020/02/03/why-every-business-needs-a-website/?sh=9c5fc9d6e75c

Improvements to website functionality, design and accessibility is a critical component to enhance the program and increase the program's reach by encouraging and supporting enrollment.[115]

Customers Often Not Aware They are Enrolling in LifeLine

According to feedback from focus groups, stakeholder interviews, and survey results, learning about the LifeLine program is often a matter of chance for the average customer. It is important to reiterate that customers frequently reported that they were not aware during their interactions with Street Teams that Team members were offering the LifeLine program. Current customers who participated in each aspect of the Evaluation remained uncertain that they were enrolled in LifeLine even as they contributed to the Evaluation.

A consistent concern expressed about enrollment in the *wireless* program was related to Street Teams' perceived legitimacy, and if Street Team personnel would use and protect personal data appropriately. Current customers, County Social Services and CBO representatives described instances in which eligible customers declined to enroll in LifeLine due to lack of trust in the Street Teams. Some stakeholders and focus group participants shared specific examples of misuse of personal, protected information (PPI) or fraud (however it was beyond the scope of this Evaluation to corroborate this information).

With no more than a few exceptions, the typical customer who participated in this Evaluation is simply not aware enough of the program, its parameters, and options to seek out the program directly. The most savvy and aware customers tended to be those who were in urban environments in which the saturation of Service Provider Street Teams was more obvious *and* in which they had experience either by chance or by choice of having been enrolled in LifeLine through more than one Service Provider over the course of time, thus having the experience of different devices and services.

Service Providers do benefit from, and in some reported cases exploit, the customer's general lack of knowledge around program requirements. One example reported during a focus group in San Francisco's "Chinatown" includes participants reporting that they were required to pay a $30 cash fee when signing up with Street Teams. Many customers also shared experiences of encountering challenges with their device or seeking answers to questions about their plan or the program and as their only reference point for information, returned to the Street Team where they signed up. When customers would find it was a different Service Provider than who they enrolled with, the Service Provider frequently turned them away, or used the opportunity to switch the customer to a different service.

While enrollment via Street Teams appears to be a deterrent for some eligible customers, for those who elect to enroll via this method, the experience of having Street Team personnel preliminarily enrolling via on-site scanning and uploading of documents was described as easy and fast. The ease of providing documents is a key factor for consideration, as a regular complaint about social services programs including LifeLine is that both the requirements and the process for providing eligibility documentation is a barrier and a deterrent for enrollment.

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115   *https://www.usability.gov/what-and-why/accessibility.html*

Of the *wireline* customers who participated in the Evaluation, most reported learning about the program via information contained with their bill and enrolling in LifeLine through a paper process. Several *wireline* Service Providers interviewed described needing to take extra measures to ensure that *wireline* customers have the necessary information and support to successfully enroll and to renew enrollment. Service Provider support included in person meetings with customers to aide in the correct completion of the paperwork. Due to the renewal freeze, it is unknown how much the interruption of in-person support impacted renewal during COVID. However, if individual enrollment and renewal support is required to increase accurate program enrollment, this is indicative of the need to continue to simplify the application requirements and process to reduce barriers and completion errors, especially for the *wireline* demographic.

Eligibility Determination and Partnership with Social Services

As stated previously, LifeLine is effectively a social services benefits program. It is administered by a utility regulator, and by extension, staff who understand and are hired to support utilities operations but not do not collectively have extensive experience administering benefits programs. The result of that is program design and implementation decisions that are inconsistent with methods for connecting with, and being responsive to, the needs of its target population. A pervasive theme throughout all aspects of this Evaluation is that well-intentioned attempts to improve the program have historically been approached through a utilities delivery lens that centers on the telephone service rather than through the lens of a social services program that centers on the needs of vulnerable low-income California residents.

An effect of this is as evidenced in stakeholder interviews and focus group conversations, administrators at California Department of Social Services (CDSS) and several county departments of social services (DSS) agencies throughout the state are either unaware of the LifeLine program or are deeply skeptical about it. Furthermore, according to Communications Division staff, DSS agencies have historically been hesitant to partner with CPUC for implementation of the program. As CPUC did not conduct any direct collaboration with DSS prior to the recently implemented data-sharing project with CalFresh, the most common reference point about the program for DSS staff aware of LifeLine is Street Teams. Some interviews with Social Workers, Eligibility Workers and community advocates referenced a "disrespectful" nature of utilizing the Street Teams method of outreach in that it reflects a lack of care and investment in eligible customers. The phrase "second class program" for "second class citizens" was repeated in multiple interviews.

Additionally, many Social Workers and Eligibility Workers interviewed reported having never heard of the program, and while they recognized the term "Obama Phone", they did not associate the phone with LifeLine. Instead, they only associated the "Obama Phone" with Street Teams who they overwhelmingly reported were not considered trusted by them or by their clients.

For the following section of analysis of stakeholder input, the terms "formal" and "informal" are used. For the context of this Evaluation, "formal" is used to describe a relationship that is documented through mutual agreements, Memorandum of Understanding, or policies and procedures that outline the parameters of a partnership. An "informal" relationship could include partnering with an entity to conduct general outreach such as "email blasts" that are broadly shared and include links to information about eligibility or enrollment, or the dissemination of fliers or pamphlets that can be made available as agencies see fit.

Throughout the Evaluation, participants from every stakeholder group and focus group (apart from Service Providers), supported the idea of creating a formal relationship between CPUC and CDSS or local DSS agencies to provide immediate, accurate verification of individuals' eligibility to increase LifeLine enrollment. Participants from all stakeholder groups also supported informal partnerships between CPUC and DSS.

Many stakeholders described the following mutual benefits to the establishment of a formal partnership between DSS and LifeLine. By assuring that individuals with limited incomes have access to a phone, DSS will have more reliable contact with their clients to push out information, reminders, and needed updates or support. CPUC would benefit by having direct access to the population the program is designed to serve from the people who administer the programs that confirm LifeLine eligibility. Partnering with DSS could also contribute to better program recognition as well as lend credibility and legitimacy to the program. It may further provide for a better understanding of, and acknowledgement of, the needs of the low-income population by Communications Division staff, leading to additional programmatic improvements in the future.

The potential of a formal relationship has been explored in conversations between CPUC and CDSS and was described to the University during this Evaluation; two key concerns surfaced. The first was a shared concern for protection of customers' personal identification information (PII) and other potential information sharing restrictions, as well as potential limited interest or commitment by one or both organizations to navigate this barrier. Second, Social Services staff expressed concern as it related to the potential administrative burden that might be added to Social Workers or Eligibility Workers who are positioned to support implementation. Despite these concerns, Social Services staff at the state and local level were open to future exploration of a formal relationship.

Because the University was not made aware of the data-matching project with CalFresh until October 2021, stakeholder interviews and focus group conversations were not able to explore details of the project and its potential implications because said interviews were concluded by this time.

As previously described, the data-sharing project is directed at renewals for current LifeLine customers via their CalFresh enrollment, resulting in automatic renewal based on DSS verification of eligibility. While setting up the system and working out the algorithmic issues can be a challenging and tedious process, based on the information gleaned about the project, it appears to require no additional work from a Social or Eligibility Worker which addresses a key concern expressed by DSS.

This effort is a major step in the right direction and consistent with the feedback received during this Evaluation toward maintaining program enrollment specifically for the *wireless* customers who have much lower renewal rates. According to conversations with Communications Division staff and the TPA, the intent is to utilize lessons learned from the renewal data-sharing project with CalFresh for eventual expansion to include LifeLine enrollment, and later establish similar agreements with Medicaid/Medi-Cal to verify active Medicaid/Medi-Cal enrollment, and thereby, eligibility for LifeLine.

When asked about informal partnering, DSS staff at the state and local levels expressed universal support to ensure that eligible customers are made aware of the program. Descriptions of informal partnering included suggestions of sharing informational flyers with clients, sending digital messages that include LifeLine information, or helping persons navigate to the CPUC LifeLine webpage during virtual or in-person meetings with their Social or Eligibility Worker.

Creating Outreach Partnerships with Organizations and State Agencies Serving Similar Populations

An increase in LifeLine name recognition and social validity can help ensure the eligible population gains a general awareness of the program's existence and trusts the program as a valuable resource. In addition, much of the target customer base may not have the time or ability to plan or research their enrollment in the program. In this regard, partnerships with trusted community sources can be especially beneficial. Potential partnerships specifically with the DSS are discussed in the previous sub-section.

Several CBOs and benefits departments representatives interviewed stated that utilizing trusted messengers is a common practice for the exchange of reliable information. People are more receptive to receiving information from members of their own community, from those with whom there are similarities, and from organizations and institutions with established credibility and positive reputations. Furthermore, people are more likely to act based on the influence of someone they trust. Trusted messengers can include CBOs, faith-based organizations, local media, friends, family, co-workers, and similar.

Similarly, these interviewees stated that they provide generic information about LifeLine to their clients but assert that more robust outreach and broader exchange of information should be implemented. Stakeholder feedback included the following suggestions on how this could be accomplished:

- Via the generation and sharing of basic LifeLine marketing materials and information provided by Communications Division that CBOs and others could distribute on behalf of CPUC, either via print, online or both.
- CBOs and partners could tailor messaging to better engage different demographic groups who are under enrolled (e.g., rural and tribal populations, individuals who speak languages other than English, individuals who qualify for TTY, etc.).
- CBOs and partners could be available to assist eligible customers to navigate the enrollment process.
- CBO partners could provide consistent and reputable program outreach to places where their target populations frequent including street outreach to connect with populations who are unable or averse to engaging in services in traditional manners. This is especially useful for unhoused or transient individuals.

The LifeLine program has in the past explored formalized outreach partnerships with CBOs serving the target population, wherein CBOs would provide marketing materials and information about the LifeLine program to their constituency and be afforded a stipend per individual they assisted with the enrollment process. The issuance of a stipend for CBOs reportedly proved challenging for CPUC and the TPA to administer. In one instance described by an interviewee, it indirectly resulted in what was considered favoritism being shown towards a particular Service Provider, which goes

against CPUC's mandates. Utilizing lessons learned from this one instance can improve the process moving forward, as the potential benefits of utilizing CBOs as outreach and enrollment partners continues to exist and is further described in the recommendations section.

Specific Eligible Populations with Unique Challenges

Identification Requirements for the Recently Incarcerated Population

According to stakeholder interviews, approximately 12,000 people are released from prison in the state of California each year. With few exceptions, these individuals are all eligible for the LifeLine program, and in great need of the service. From a LifeLine enrollment perspective, public safety perspective, and from the perspective of the individual being released from prison with a variety of reentry barriers, solidifying a process to provide reentering individuals with enrollment into the LifeLine program would be exceedingly beneficial.

The first few months after exiting incarceration are the most vulnerable for the reentry population. Providing eligible customers on parole with the means to contact their Parole Agent, communicate with potential employers, manage health, behavioral health or other treatment needs and to stay in contact with their families and support systems can truly be the nexus to a healthy path free from reincarceration.

The primary barrier to enrollment for the reentry population is the inability to produce an acceptable form of identification (ID) such as a valid driver's license, State ID or passport, to verify identity for LifeLine eligibility. (A list of currently qualifying identification validation documents is found in Appendix G). The process of being issued one of these identifications can take months. Another common barrier is the general lack of awareness about the program's existence.

There currently is no formal relationship between California Department of Corrections and Rehabilitation, Division of Adult Parole Operations (CDCR-DAPO) and CPUC to assist recently incarcerated individuals to obtain LifeLine.

The Communications Division staff requested that the University research the needs of the reentry population as a key underserved demographic to engage in LifeLine. Several CDCR staff interviewed were also eager for ways to support a partnership between the agencies to better serve this population.

Based on information gathered from stakeholder discussions and additional research into ID requirements, it is possible for CDCR-DAPO to provide a document verifying a customer's identity prior to release to assist the individual in applying for LifeLine. The validity of this documentation would be equivalent to documentation provided by other state agencies, such as DSS, verifying a person's identity. CDCR-DAPO supports providing this documentation and has begun to explore means in which to institute this within their department. Other options to consider to address the lack of ID of the recently incarcerated include: CDCR-DAPO to request that FCC grant an exemption for ID requirements for the recently incarcerated, or CDCR-DAPO establish a partnership with the California Department of Motor Vehicles to expedite the ID process.

CDCR-DAPO is also willing to have staff working in field offices complete trainings on LifeLine enrollment, and to distribute basic informational materials on the LifeLine program to persons as they exit incarceration.

CDCR-DAPO did explore the possibility to partner with a Service Provider to store cellular devices on-site at field offices for immediate issuing. However, this approach is reportedly in conflict with CPUC's General Orders as an agency cannot demonstrate preferential treatment towards any one Service Provider.

Lack of Accessibility in Tribal and Rural Communities

The lack of access to both *wireless* and *wireline* service for individuals living on tribal lands and rancherias is severe. As discussed above, over 300,000 tribal households are automatically eligible for the LifeLine program through Tribal TANF alone and yet across the state, only one percent of tribal households are enrolled. Program awareness is a major factor impacting this disproportionate enrollment rate. However, as program awareness is directly impacted by the lack of infrastructure and access to telecommunication services on tribal lands, there are specific recommendations on this topic provided in that respective Section of the report.

Tribal representatives were engaged in stakeholder interviews as part of this Evaluation. It was recommended by all tribal representatives that the University avoid holding tribal member focus groups as it would likely be perceived as cultural taxation and insulting given that the lack of infrastructure, information, and access is so extreme and, in many cases, non-existent.

As reported by tribal representatives during the interviews, current circumstances surrounding the lack of infrastructure, information, and access to resources including LifeLine on tribal lands is complex. It includes hundreds of years of exclusion, broken and bad faith agreements, and substandard or inadequate government provided "solutions."

Regarding infrastructure, while outside the direct purview of this Evaluation to determine the status of and responsible parties for such infrastructure, it must be noted that the development of telecommunications infrastructure has not occurred on tribal lands commensurate to other places in the state. However, as is true in all California communities, there is much variation among and between all tribal lands and rancherias in the state. While many tribal lands have no telecommunications infrastructure, some areas have some infrastructure, and some are well connected.

On tribal lands in which there is some infrastructure, the quality of the service is described by stakeholders as being "poor" and "not worth the frustration" to enroll. Tribal representatives interviewed reported that many people opt for an expensive device and plan for which the service is more reliable even though it is a significant financial strain.

The substantial issue of tribal access will not be addressed via infrastructure alone. Research conducted in the areas where at least some infrastructure does exist revealed there was also no evidence of marketing or outreach for the LifeLine program. Tribal TANF representatives who administer benefits and interact with many families living on tribal lands had not heard of the program, and did not recall seeing fliers, advertisements or materials related to it. The only tribal stakeholder interviews in which people were aware of LifeLine were those whose job it is to support telecommunications access on tribal lands.

Relying entirely upon Service Providers to market the program appears to have resulted in virtually no efforts to provide outreach to tribal lands regardless of their service capabilities. While need might be high, trust, value, and quality remain low. Tribal government leaders have not been engaged about the program, nor included in a manner that has instilled trust in the program. According to tribal stakeholders, without tribal leadership support, most tribal members will not enroll in the program.

While trust and utilizing trusted sources or "credible messengers" to market the program was a prominent theme throughout most stakeholder (tribal and non-tribal) interviews, it is an especially critical factor when attempting to engage tribal members in the program. As reported in every interview, tribal members have a long history of documented abuses and broken agreements via government entities that contribute to a significant amount of distrust including rejection of government services. However, the tribal representatives interviewed all agreed that telecommunications connectivity can truly act as a link for those who are sometimes very geographically isolated, and also as a means for individuals to better meet their needs and improve their quality of life. All of the tribal representative interviewees adamantly expressed that in order for individuals residing on tribal lands to be willing to consider a program such as LifeLine, marketing of the program would need to be supported and endorsed by trusted sources within their community.

Additionally, amongst many tribal members, there is a lack of value in the service itself. One of the stakeholders described it as "in some cases families are living without electricity, running water, roofs… how do you convince them to see the value in communications connections?" The impact of generations of deprivation has taken a significant toll on tribal families and resulted in little to no interest or faith in government subsidized programs and services despite genuine need for the service. Another stakeholder stated: "there are so many disparities that tribes are facing, sometimes telephone [needs] fall to the side in the midst of it all." Trusted sources are a way to begin to combat this issue.

Note: The enrollment rates for TTY users and limited-English speakers are also exceptionally low. Unfortunately, the level of detail about both groups was not available at the time of the Evaluation to be able to develop specific recommendations to better meet their needs.

VII. SUMMARY OF FINDINGS & RECOMMENDATIONS

As stated throughout this report, the mission of the LifeLine program, to "provide high-quality basic telephone service at affordable rates to the greatest number of California residents," was appropriately applicable to households in the late 1980s through 2010s when a single landline per household was common. Due to the evolution in telecommunications technology and a societal shift from landline use to the prevalent use of cell phones as personal, mobile devices, there is now a fundamental disconnect between the mission of the LifeLine program, the way in which the program is implemented, and the way eligible customers use telecommunications tools. While the definition of "household" has been revised to refer to specific "economic units" within the same dwelling, many individuals who could benefit from the program still do not have the opportunity to receive the subsidy. Program enrollment could noticeably increase if LifeLine was made available at the individual level, where qualifying families could receive multiple *wireless* LifeLine plans (e.g., married couples, parents with co-dependent teenage children). However, it is understood that LifeLine must be consistent with FCC regulations to receive the federal subsidy, and a change in the definition of the "household" at the federal level would be required in this instance.

A key finding of this Evaluation is that LifeLine is effectively a benefits program addressing a deregulated industry, administered by a utility regulator, and by extension, staff with greater experience in utilities operations but not necessarily the administration of benefits programs to low-income California residents. The result of that is program design and implementation decisions that are inconsistent with methods to connect with, and be responsive to, the needs of target populations. While many state agencies deal with extensive work needs and limited resources, this is particularly compounded for LifeLine because of the disparity between the training, educational background and career experience of the staff hired to support LifeLine, versus the social service needs of LifeLine customers. Communications Division staff have been and continue to be effective and dedicated civil servants. However, they are hired using position classifications that do not necessarily lend themselves to background experience and expertise that is relevant to a social services program. Once hired, they are often not resourced to problem solve challenges related to the administration of a social service program.

LifeLine program implementation is structured by necessity, to outsource daily operations to the TPA, with additional services provided by the IT consultant. The Communications Division is historically understaffed and experiences a high degree of turnover/onboarding resulting in a lack of institutional program knowledge.

Related to this lack of institutional program knowledge, despite enquiry about a strategic vision regarding increasing overall enrollment to meet the needs of California's eligible residents, awareness about such a strategic vision was not widely known or discussed by Communications Division staff, the Commission, or the various Working Groups/committees during this Evaluation.

Another primary factor limiting enrollment by eligible and high-need populations is a lack of awareness of the LifeLine program by the public. LifeLine as a subsidy program does not have name recognition within the populations it is supposed to serve. Additionally, LifeLine does not have any branding or cohesive marketing, nor does the program conduct outreach to eligible populations. This designates communication about the LifeLine program to Service Providers who

presently have more incentive to enroll new customers into their service than to inform customers about the public benefit, details, and parameters of the LifeLine program.

Despite the expectation of market competition (as described by the LAO in their Report) between Service Providers, in its current design, LifeLine does not foster, nor define itself as fostering competition as there is little variation in the services offered by each Service Provider and few customers are aware that they have a variety of different Service Providers from which to choose. Furthermore, it remains challenging for the CPUC to determine the appropriate subsidy amount for services, given that financial data from Service Providers is not forthcoming, and the deregulated nature of their work.

Current LifeLine customers appear to appreciate the program and the services that are offered. For *wireless* customers specifically, this is largely because they can participate in the program with no-cost and receive a free cell phone. However, survey and focus group findings show that in almost all LifeLine households, there is at least one other non-LifeLine cell phone in use due to either the low quality and/or service of the LifeLine phone, or the need to have more than one cellular device per family. Focus group and survey respondents expressed gratitude for a free *wireless* device while also simultaneously considering it of low value due to its quality and ability to be easily replaced at no-cost.

The general negative stigma associated with participating in the LifeLine program, particularly because of the use of Street Teams, was a pervasive theme throughout the Evaluation. At the same time, the reliance on Street Teams as the principal method to reach the target population and secure enrollments was emphasized across all stakeholder groups and data gathering methods. This points to the need for CPUC to foster formal and/or informal partnerships with other organizations or agencies seen as trusted messengers within specific communities to conduct outreach on the LifeLine program and reduce the dependence on Street Teams.

Implementation of the LifeLine program has recently undergone several important updates, such as use of the SPIA process and the data-sharing project with CalFresh for automatic verification of program-based eligibility. This latter project, only implemented on November 12, 2021 (near the conclusion of this Evaluation period), is especially critical as a method to maintain customers in the program and increase enrollment. It is CPUC's stated goal to soon develop additional data-sharing agreements with Medi-Cal, as 95 percent of LifeLine customers verify eligibility via enrollment in either CalFresh or Medi-Cal.

Several other practices remain in need of modification to better serve the target population with the goal to increase enrollment of new customers and maintain enrollment of current customers. For example, the reliance on postal mailing communication rather than digital interfaces for some parts of the application processes, a need to collect customer email addresses and demographic information as part of program enrollment to design targeted communications and outreach activities, and the need to develop a user-friendly online customer portal to streamline application and renewal processing.

Finally, while there is agreement that the program is underutilized, the metrics to estimate enrollment may not be the most accurate to predict take-up rates. Relatedly, the CPUC does not have, nor has the Legislature communicated desired and defined metrics for successful program enrollment (for example, 80% of the eligible population by 2030). To more accurately measure the impacts of the variety of program improvements already underway, as well as any of those recommended in this Evaluation, it is critical that the enrollment goal being measured is applicable and realistic for this type of benefits program.

Given these findings and observations, the following recommendations are presented for consideration by the CPUC, the Legislature, and other agencies and interested parties who serve the target population. Recommendations are organized by primary sections of the report and listed without hierarchical priority. Some recommendations, if implemented, will be of higher impact than others. Some will take considerably more resources and time to implement. It is per the discretion of the CPUC, Legislature, and stakeholders to further consider criteria for implementation and determine which, if any, to advance over a designated timeframe. Lastly and consistent with above text, while these recommendations are by necessity, included in this report to CPUC, this does not confer that implementation of these recommendations are the sole responsibility of CPUC. Rather, several of the following ideas will require action and leadership by other parties as they are not within the latitude of CPUC to address.

I. LIFELINE PROGRAM REACH

1. **Realign LifeLine Policies to Meet Current Telecommunication Needs of Low-Income Populations.** LifeLine policies were developed in the 1980's when telecommunication technology and its intended use were radically different than those of present day. Most notable is the current dominance of cellular phones versus landlines; the rate at which telecommunication tools and technologies change; and how smart phones connect individuals to services, people, information, broadband, and the tools they need to conduct their daily lives. These changes represent a profound shift from telephones being considered a vital household utility, to a vital personal device that has myriad uses such as keeping individuals connected to social networks, their jobs, retail and banking, navigation, health care, education, and more. The need for cellular service and smart phones is amplified when considering low-income populations that are unhoused, housing insecure or are overall transient. The current LifeLine program design and structure is based on the historic *wireline* technology and utilization, despite the steadily decreasing *wireline* customer base. CPUC is actively working to update and modify GO 153 to reflect this evolution. To further meet the distinctly different needs of the shrinking *wireline* population and growing *wireless* population, it is recommended:

   a. Program decisionmakers and associated communications articulate the distinct differences between the *wireline* and *wireless* components of LifeLine and, in order to meet customer need, all parties approach the decision-making, design and delivery of the *wireline* and *wireless* components of the LifeLine program as distinct.

   b. Prioritize the development of updated policies and procedures that align with the technology and needs of the growing *wireless* customer population and how they interact with telecommunications.

   c. Advocate for the federal Lifeline and state LifeLine telecommunication policies to be revised to remove the limitation of one phone per household (economic unit) to address the discrepancy between the customer need and current program policy.

   d. In an effort to simplify requirements for *wireline* customers and Service Providers, Communications Division work with *wireline* Service Providers to better understand their reported challenges regarding implementation of required policies and likewise, Service Providers propose effective means with which to report these challenges for CPUC consideration.

2. **Develop a LifeLine Program Strategic Plan that is Accountable to the Diversity of the State's Population.** The LifeLine program has not identified or articulated specific, achievable strategic objectives based upon the needs of the eligible populations of diverse California residents. As this Evaluation demonstrates, the LifeLine program is overall under-serving eligible low-income households, and is significantly under-serving households such as those with Tribal affiliations, and those who speak languages other than English. The following is recommended:

   a. CPUC work with the TPA and key stakeholder groups to identify reasonable goals for the overall enrollment rate in the program, and key measures of equity for sub-populations based upon region, those in rural areas, language, ethnicity/race, Tribal affiliation, TTY users, and similar. These metrics will then inform program design/implementation outlined in a Strategic Plan, as well as policies related to Service Providers participation in the program.

   b. A Strategic Plan should:

      i.   Include five-year graduated goals to increase enrollment and meet the needs of eligible low-income customers.

      ii. Measure progress through SMART[116] goal metrics.

      iii. Identify specific population indicators to measure enrollments, equity, and strategic progress statewide, and among specific populations.

      iv. Include and collect a wider range of demographic information (than is currently collected) at enrollment to better track measures of equity and inclusion.

      v.   Create a specific, dedicated annual review period and decision system about telecommunication tools and technologies to ensure that LifeLine program design and policies stay consistent with rapid market-based changes beyond CPUC control.

      vi. Include a LifeLine program organizational chart outlining reporting structure, hierarchy, division of labor/duties, as well as the Working Groups, TPA, IT Consultant, and Commission.

      vii. Describe the roles, responsibilities and reporting authority of all LifeLine program positions, Commissioners, standing Working Groups or committees, TPA, IT Consultant, Service Providers and other key partners in the oversight and administration of the LifeLine program.

3. **Assess the Accuracy of the Recently Updated Methodology Used for Program Enrollment Estimates.** While it is recognized by the LAO and confirmed via this Evaluation that the LifeLine program is underutilized, it is also important to acknowledge that the methodology currently used to establish enrollment goals may be setting an artificially high bar for enrollment. As part of the Governor's 2018-19 May Revision, the LifeLine enrollment estimates methodology was updated and now relies on historical trends in new enrollments and annual renewals to project future caseload, rather than basing estimates on assumptions about future take-up rates. It is recommended that:

   a. Once COVID-related renewal freezes have ceased, and in consultation with other subject matter experts, the Communications Division assess the new methodology to determine its accuracy and potentially make adjustments to establish a more accurate and realistic benchmark for enrollment (if warranted).

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116   Specific, Measurable, Achievable/Attainable, Realistic/Relevant, Timebound.

4. **Add Visualization Map(s) of Coverage by Service Provider to Demonstrate True 'Availability' Where Access to Phone Service for both *Wireline* and *Wireless* can be Readily Obtained Through Infrastructure as well as Identifying Service Gaps.** As a tool to better serve low-income Californians to identify if or which LifeLine service is available in their area, as well as to identify gaps in service availability for future investment, the following is recommended:

   a. CPUC require Service Providers to submit information pertaining to geographic coverage area, such as shape files, as part of their enrollment in the program.

   b. Communications Division add a visualization map of coverage by Service Providers to the CPUC LifeLine website that can be updated as new Service Providers come on board and new infrastructure is built and associated coverage changes occur.

II. PROGRAM OPERATIONS AND IMPLEMENTATION

1. **Implement Recommendations Identified by the Renewals Working Group.** There was overlap between the period in which this Evaluation was conducted, and when the RWG efforts occurred. The RWG findings were reviewed and found to offer beneficial recommendations to improve the renewals process. It is therefore recommended that the RWG recommendations be implemented along with those contained within this Evaluation.

2. **Streamline Program Enrollment and Renewal Processes, including Digitizing Customer Correspondence.** On December 16, 2021, the University was provided a list of improvements that have been/are being developed to address some of the identified issues related to streamlining of enrollment and renewal processes, but due to the renewal freeze were unable to be implemented and tested for efficiency and effectiveness. The following is recommended:

   a. Communications Division build in metrics to measure and report the impacts on enrollment and renewals of the forthcoming updates, inclusive of the recent data-sharing agreements with CalFresh.

   b. Communications Division continue to work with customer stakeholder groups and the TPA to identify any additional areas that can be improved to reduce expenses and inefficiencies in the enrollment/renewal/verification processes with the specific goal of reducing use of paper copy/postal mail methods, automating enrollment and renewal processes to the greatest extent possible and simplifying processes for the LifeLine customer.

   c. Email addresses be collected during enrollment/renewal for both *wireless* and *wireline* customers and be used as a default option for all generic LifeLine related communication (e.g. statewide renewal freeze information). For any personal correspondence containing personal protected information, enrolled customers would receive a generic email message directing them to access said correspondence, via the use of a secure customer portal.

   d. Establish a secure customer portal on the LifeLine website where enrolled customers can receive and access personal information, such as digital renewal forms, via personally selected log-in credentials.

e. To the maximum extent possible and consistent with all personal information confidentiality requirements, the Communications Division utilize multiple digital communication pathways including text, email, and web-page interfaces for customer correspondence including general reminders, announcements regarding program updates, and similar, as well as a digital option for enrollments and renewals.

f. Communications Division work with the TPA to continue to identify opportunities to pre-populate customer information on renewal and other necessary forms to reduce the burden on customers as well as the likelihood of errors on enrollment and renewal forms. For example: on renewal form, if it cannot be eliminated as a field, pre-populate name in "Participant's First and Last Name" field since exact match is required and is likely to contribute to errors and correctible denials. (See Appendix H for Renewal Form)

3. **Revise Renewal Process and Requirements for *Wireline* Consumers to Meet the Needs of the Specific Demographic.** Because the data shows that *wireline* participants tend to be primarily composed of an older demographic with more stable housing conditions, whose eligibility circumstances rarely change, and who have been enrolled on average five years, the following are recommended specifically for *wireline*:

    a. While maintaining consistency with FCC guidelines, make reasonable efforts to continue to simplify digital and hard copy renewal form requirements.

    b. Advocate to the FCC that *wireline* participants renewal requirement be moved to a two- or three-year renewal cycle to further simplify the process. The current requirement to notify the CPUC of changes in eligibility would remain.

    c. Communications Division maintain only a minimum level of paper/postal mail enrollment and renewal processes for the those who are accustomed to and prefer that method and are provided a means to select that method.

    d. Communications Division monitor the rate of digital versus paper renewal to determine on-going level of resources required to administer paper/postal mail process with the goal of reducing resources required for this method of communication over time.

4. **Simplify the Eligibility Verification Process for Enrollment and Renewal for *Wireline* and *Wireless* Customers.** Stakeholders reported that documentation requirements needed for verification of eligibility are burdensome for customers and challenging for Service Providers. With consideration that some work has already been done to simplify this process and to the extent that it can continue to be improved, the following is recommended:

    a. CPUC require the absolute minimum amount of verification information needed to confirm the customer's identity for the enrollment and renewal process while aligning with federal Lifeline program requirements.

    b. Digital forms be pre-populated to the maximum extent possible with existing customer information, and that customers are offered an option to check a box for renewal that confirms: "none of the circumstances related to my eligibility for the LifeLine program have changed in the past year" that will bypass the need for the consumer to re-enter their information into the system thereby reducing the risk of errors and correctible denials.

5. **Expand the List of Acceptable Government Issued forms of Identification or Documentation Used for Program Eligibility.** Outlined below are recommendations that address the needs of the reentry population as well as individuals who are unhoused or released from other institutions such as hospitals or treatment centers. These populations often do not have a valid form of identification available to them but are at exceptionally high risk for a variety of issues in which the LifeLine program would be a tremendous asset. The following are recommended:

    a. Communications Division staff work with the TPA to expand the list of acceptable government issued forms of ID or documentation on government letterhead that verifies an individual's identity and eligibility until a currently approved form of identification can be obtained by said individual.

    b. A system be created to allow CDCR-DAPO issued documentation to qualify as an acceptable form of identification and eligibility for the LifeLine program.

    c. To the extent that the Communications Division is concerned about the potential for fraud related to the use of a CDCR-DAPO form of identification, implement a tracking system to determine incidents of fraud related to this population.

    d. Communications Division staff work with CDCR-DAPO staff to establish a method of LifeLine enrollment for the reentry population that accomplishes the goal of either having a device in the hands of an individual as they walk out of the prison gates or within the first 30 days of their release when they meet with their Parole Agent.

6. **Regularly Produce and Track Enrollment Data Disaggregated into Regions and Populations via Digital Dashboard[117].** LifeLine data that is made available is only reviewed at the state-wide level which in the aggregate, obscures important details that can help focus outreach efforts to regions and populations in need. Data reports should be developed and produced that reflect the goals of the recommended new Strategic Plan that incorporates specific objectives to address issues of access and inclusion of the state's eligible populations. In addition to the monthly reports produced by the TPA, the following is recommended:

    a. Disaggregate data by region and include the ability to review regional and statewide data trends by various population indicators. See below for additional details.

    b. Communications Division work with LifeLine stakeholders and community advocates to identify meaningful performance indicators to ensure the program is reaching various populations. LifeLine enrollment/renewal can be tracked by region and population indicators to measure performance indicators for the LifeLine Program.

    c. Communications Division and TPA leverage the data collected in the enrollment process and with Service Providers to produce additional reports that would inform the following:

        i. Information for Service Providers to identify what could be used to target under-enrolled populations within their service areas and guide outreach.

        ii. Performance benchmarks, based upon industry standards, to monitor the work of the CPUC, TPA and Service Providers to achieve the strategic objectives.

7. **Clarify and Document the Functions and Responsibilities of the Communications Division Staff and the Implementation of the LifeLine Program Overall.** Historic rapid programmatic changes (at state and federal levels), staff turnover, and overall limits of staff numbers have contributed to a reported (via interviews conducted in the Evaluation) lack of documentation and clarity about the administrative roles and programmatic functions of the LifeLine program. This in turn contributes to challenges to communicate comprehensively about general operations of the Division and other broader impacts both internally and externally. The following is recommended:

   a. CPUC Communications Division develop and disseminate written policies for program implementation throughout the Division with accompanying periodic training to level-set for all current and future staff.

   b. Staffing for the Communications Division be increased. Acquire legislative support (re; CPUC labor and hiring classifications) that enhances staff retention and promotions within the Division to retain institutional expertise.

   c. The governing documents for all the decision-making bodies and roles associated with LifeLine be made easily accessible to Division staff and the public by improving navigation to where Rules and Decisions are available on the CPUC website and offering brief descriptions of the outcomes of Rules and Decisions.

   d. Develop accessible documentation that provides transparent (as appropriate) information to the public about the structure, purpose, and roles of all parties for Working Group and committee meetings.

   e. Communications Division develop administration/ implementation guidelines that can be utilized by any TPA and referred to by all Communications Division staff and supporting contractors assigned to the program.

   f. Communications Division develop a standard, on-boarding training program including an implementation manual for new staff to become proficient in the history of the program, current rules and decisions governing program implementation, current program components and projects underway, and similar.

   g. Communications Division's LifeLine staff are given the training, resources, and authority to recognize and resolve tangible opportunities to increase program enrollment, and otherwise improve the program's effectiveness and efficiency.

   h. Communication Division receive adequate budget (as defined by the Legislature) to hire consultants that specialize in marketing, outreach, and public relations of social services programs.

   i. Create internal hiring requirements unique to the Communications Division that are, for some staff positions, disassociated from the standard educational and experience qualifications for other CPUC utility administration roles as a means to better recognize and accommodate the unique nature of LifeLine within CPUC's organizational structure and culture.

8. **Revisit the Current Approach to the TPA Request for Proposal /Contract to Ensure Long-Term Sustainability and Optimal Functioning of the Program.** As the CPUC prepares to initiate the RFP process for the TPA, it is recommended that this coincide with an internal cross-training effort so that, should a different TPA be selected, the Communications Division does not lose the detailed knowledge, expertise, and experience of administering the program which currently largely resides with the TPA. Related to this, include in all future RFPs and TPA contracts, requirements that upon completion of a term of service and potential replacement through an RFP process, the current TPA is required to prepare for and conduct on-boarding activities with an incoming new TPA.

III. PHONE SERVICE PROVIDERS AND MARKET COMPETITION

1. **Conduct External Economic Analysis to Justify or Revise Subsidy Rates to Stimulate Market Competition.** In stakeholder interviews and focus group conversations, most Service Providers reported that the LifeLine subsidy they received does not adequately cover the cost of the administration and implementation of the LifeLine program. However, because none of the Service Providers have shared financial data with the CPUC to allow for a comparison, these reports cannot be validated. It is also noted that subsidies in the program exist to benefit customers, not the Service Providers and said subsidies are updated through a combination of annual FCC and CPUC decisions. If Service Providers want decisionmakers to consider adjusting subsidy amounts to support claimed increased costs, this decision needs to be based on the actual cost of providing LifeLine service. The following is recommended:

   a. Service Providers may elect to sign a Non-Disclosure Agreement with CPUC or a third-party evaluator to share financial data for purposes to conduct economic analysis for subsidy revisions.

2. **Institute an Eligibility Authorization Number System that Customers May Apply to a Service Provider of their Choice.** The paradox of the regulatory environment in which the LifeLine Program operates is that while it is meant to allow for market competition and customer choice, there is limited evidence to support that it does either, nor is market competition a defined condition that CPUC is mandated to foster. To enhance both features which are key factors in the regulation of utilities, the following is recommended:

   a. Expanding on the current data sharing agreement with CalFresh, each eligible customer be given an eligibility authorization number upon verification of eligibility in any qualifying LifeLine program that they can apply to a LifeLine Service Provider of their choice. Lessons from USAC's customer pre-approval model may be applied to forthcoming SPIA application process.

   b. Look for opportunities to incorporate processes that would allow customers to apply the eligibility authorization number to enroll in LifeLine. For example:

      i. Via the CPUC website portal utilizing a dropdown menu in which they can choose their Service Provider

      ii. Requesting Service Providers to support this feature on their respective LifeLine webpages

      iii. In person via a brick-and-mortar retailer

      iv. Via text renewal processes

      v. Via hardcopy renewal

3. **Cultivate True Market Choice and Competition by Actively Promoting All LifeLine Service Provider Plans and Services and Allow Customers to Choose their Plan Via a CPUC hosted Online Marketplace.** Building off the previous recommendation, to enhance market competition and customer choice, as well as to enhance legitimacy to the LifeLine program, the following is recommended:

    a. Communications Division focus on funneling all eligible customers to the LifeLine website to compare and choose their preferred Service Provider.

    b. Communications Division include a feature within the website where Customers may apply their eligibility authorization number through online enrollment via the CPUC website or click on any of the LifeLine Service Providers and enroll via their LifeLine websites.

IV. CUSTOMER EXPERIENCE

1. **Utilize Trusted Sources Including Social Services and Community Based Organizations to Promote and Support Enrollment in the LifeLine Program.** During stakeholder interviews, the terms "second class citizen" and "second rate program" were used to describe the customer experience of the LifeLine program. Most stakeholders described the Street Teams, who generally are not considered a legitimate and trusted source, as the primary customer interface. From the stakeholder perspective, this decision translates to CPUC not caring about the eligible population enough to provide the service in a more respectful and dignified manner. Eligible customers, benefits providers, advocates, and CBOs support CPUC's investment in trusted, legitimate sources to enroll eligible customers to balance the reliance of Street Teams. The following is recommended:

    a. The partnership with social services benefits providers at the state and/or local level be expanded to, at minimum, promote the program using standardized marketing and outreach tools and resources addressed in Section V below and as informed and commented on by said providers and CBOs, perhaps through focused discussions at existing work groups related to LifeLine oversight.

    b. The current data-sharing program with CalFresh expand beyond renewals and include enrollment verification that generates an eligibility authorization number that eligible customers can activate with or without the assistance of the Social Worker/ Eligibility Worker. (See Recommendation III, items 2 and 3 for additional details)

    c. Social services benefits providers utilize existing relationships with CBOs to conduct LifeLine enrollment outreach to their constituency in manners most conducive to engagement with the needs of the low-income populations they serve including street outreach to serve difficult to reach populations.

    d. Communications Division request and be provided necessary resources to support social services benefits providers and their partnering CBOs, to implement LifeLine outreach and enrollment activities to reach enrollment goals (which should be defined as part of the Strategic Plan recommended above).

2. **LifeLine Enrollment be Embedded in the Tribal Temporary Assistance for Needy Families Process to Increase Tribal Enrollment.** Trust in government programs is low for tribal members which is one of several contributing factors to the exceptionally low LifeLine enrollment rates on tribal lands. However, since many families living on tribal lands are enrolled in the LifeLine qualifying program TANF and thereby interact with social workers who administer the TANF program, the following is recommended:

   a. LifeLine enrollment be embedded into the Tribal TANF application and renewal process in the same manner described in Recommendation 1 in this section. NOTE: This recommendation is intended to begin to improve enrollment, but alone will not address the much larger structural challenges related to Tribal enrollment that are addressed in Section V below.

3. **Routinely collect LifeLine Customer Experience Feedback to Ensure that the LifeLine Program Meets the Telecommunication Needs of Low-Income Californians.** A key component to improve and maintain access and enrollment in the LifeLine program is to hear from customers and those in support of access and enrollment in the program regarding what is working and what needs improvement. The following is recommended:

   a. Communications Division and the TPA implement a routine mechanism to gather feedback about customer experiences with the program. This can be implemented in a low burden/low-cost method via mass email messaging (consistent with requirements to protect personal information), the website or as a part of the renewal process.

   b. Communications Division seek ongoing and regular feedback from social services benefits programs that are used for eligibility purposes to maintain updates on the needs, trends, and issues facing low-income populations.

4. **Provide Training for Communications Division LifeLine Staff that Increases Knowledge of the Needs and Challenges for the Low-Income Population.** Information gathered via stakeholder interviews includes the expressed observations that LifeLine staff are not trained in how to deliver a benefits program to low-income Californian residents. The following is recommended:

   a. Communications Division collaborate with Social Services partners as well as low-income advocacy groups to identify and/or provide annual trainings for LifeLine staff to attend to increase understanding and sensitivity to the challenges faced by target populations, and to help align expectations of program performance. Commissioners as well as other CPUC working group members and decisionmakers that impact the LifeLine program are also encouraged to attend to better understand the needs and challenges of the program and/or target population.

V. PROGRAM AWARENESS, MARKETING & COMMUNITY OUTREACH

1. **Immediately Seek Approval for Increased Budget to Engage in a Strategic Marketing and Outreach Campaign for the LifeLine Program.** One of the most significant findings of this Evaluation is the general lack of awareness of the LifeLine program, most notably amongst those who are eligible for the program and/or in positions to support outreach and enrollment efforts. To begin to address this gap in awareness, the following is recommended:

   a. Communications Division be provided sufficient budget (by the Legislature) to engage in marketing and outreach for the LifeLine program. This budget should include implementation of the subsequent recommendations regarding outreach materials development and website updates, and must also include hiring of multiple consultant and staff positions (not feasible under current position classifications) to oversee program marketing and outreach.

   b. As LifeLine program's enrollment estimations are based on those that are similar to CalFresh, a comparable marketing and outreach budget should be requested to support LifeLine enrollment efforts.[118]

2. **Engage a Professional Public Relations Marketing Firm to Develop a Targeted Communication Campaign to Achieve the Enrollment Goals Outlined in the Strategic Plan.** Statewide programs that are attempting to accomplish the enrollment reach LifeLine has outlined require a professional public relations/social marketing firm with demonstrated experience working with Social Services Benefits programs and successfully reaching low-income and diverse populations within the State. The following is recommended:

   a. Communications Division engage a professional public relations/social marketing firm to develop a communications campaign to market the LifeLine program to eligible populations throughout the state. Consideration should be given to the differences between *wireline* and *wireless* services, demographic differences among these subscriber bases, and geographic areas in which the greatest disparities exist between eligibility and enrollment.

   b. The firm assist the Communications Division to develop a targeted outreach strategy that prioritizes engagement in regions of the state in which the highest disparities exist between eligibility and enrollment. This effort can be informed by the data analysis efforts and coverage map generation outlined in Section I of the recommendations.

   c. To increase brand recognition and trust in the program, the firm develop a LifeLine logo to be utilized by all parties involved in the LifeLine program including but not limited to: the LifeLine website, all LifeLine public facing documents and materials, the Communications Division LifeLine program staff's signature lines, and use on partnering Service Provider digital and print materials.

   d. The firm develop a suite of digital templates available in the seven primary LifeLine targeted languages that the Communications Division will provide to Service Providers and outreach partners who will in turn be required to use the materials as part of LifeLine marketing and outreach.

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118 It would also be a useful exercise for Communications Division to study the operational budgets of other state benefit programs with high enrollment rates of target populations to ensure financial support for marketing and outreach of the LifeLine program are comparable and satisfactory.

i. The templates would allow the inclusion of Service Provider's own logos for co-branding purposes.

ii. Template materials must include space to customize information regarding plans, services, and devices offered by Service Providers.

e. The firm develop a suite of general digital templates available in the seven primary LifeLine targeted languages for informational messaging that can be shared with additional stakeholders who are able to market or promote the program including Social Services Providers and CBOs.

f. The Communications Division consider and be provided funding to pursue other outreach material development including but not limited to: informational flyers, postcards, billboards, posters (digital and print) social media advertisements, with culturally responsive language available in the seven primary LifeLine targeted languages that provides guidance for consumers about the program and how to apply; Short (three minutes or less) informational videos on the program and how to enroll; Public Service Announcements to raise the public's awareness of the program.

3. **Include in the Marketing Firm's Scope of Work, Specific Direction to Work with Tribal Leaders and Representatives.** To be responsive to the specific needs of Tribal members as well as align the marketing campaign with the overall LifeLine program, the following is recommended:

a. Communications Division include in the proposed marketing firm's Scope of Work, specific direction to work with the Tribal liaisons (see next recommendation for further detail) to identify the best methods to market the program to Tribal members in each region of the state and how to best utilize venues, events, etc. in which multiple Tribal nations and regions come together.

4. **Hire Regional Tribal Liaisons who are Trusted Representatives within Tribal Communities and Whose Responsibility is to Liaise Between CPUC and Tribal Entities and Coordinate LifeLine Related Activities.** This Evaluation outlines a variety of factors that impact and influence the willingness of individuals to participate in government subsidized programs. The challenges LifeLine is facing in general enrollment is magnified for tribal communities and in places where there is no telecommunications infrastructure. For this reason, in addition to the fact that disparity between eligibility and enrollment for tribal communities is so considerable, the following is recommended and noted that implementation of these items will likely take several years and require partnership of various entities with CPUC as well as support from the Legislature to expand such services beyond what is currently feasible in the Communications Division's budget:

a. Communications Division hire LifeLine program liaison(s) as full employees or in a contractor capacity who are trusted tribal representatives to meaningfully engage with Tribes across the state.

b. LifeLine program Tribal Liaisons should:

i. First work with tribal leaders and representatives to map where telecommunications infrastructure exists on tribal lands, where it needs to be upgraded, and where it is absent. Any near-term outreach and marketing efforts can then be targeted based on availability of service.

ii. Work with tribal leaders and representatives to better understand, document and categorize concerns about the LifeLine program which may be preventing enrollment by eligible tribal populations.

iii. Collaborate with tribal leaders and representatives to develop a plan which establishes program enrollment goals for Native Nations over a defined time period and provides pathways to address the identified concerns limiting enrollment.

iv. Coordinate with tribal representatives and the proposed professional marketing firm to ensure that marketing efforts, language, and methods are credible, culturally appropriate, and resonate with tribal communities.

v. Coordinate with Tribal TANF representatives and the professional marketing firm to ensure that all the necessary marketing and enrollment materials needed to properly conduct outreach, engage, and enroll eligible consumers into the program is in a manner that is most conducive to the population in need.

vi. Coordinate LifeLine outreach efforts including but not limited to regional and statewide events such as Tribal Health Fairs, Tribal Councils, California Indian Conference, State Agency Tribal Summits, Native American Day in Sacramento and any additional cultural events and celebrations.

vii. Act as the point of contact for direct coordination with Service Providers to improve service quality and customer service on Tribal lands.

viii. Act as the point of contact for direct coordination with Service Providers who wish to sponsor direct outreach events on Tribal lands or at Tribal events.

ix. Provide regular reports to the Communications Division and Commission on project status including barriers to reaching goals and suggested solutions.

5. **Utilize and Leverage Existing State and Federal Resources to Create Necessary Infrastructure for Tribal Lands to have Essential Telecommunications Connectivity.** With recognition that building out infrastructure to support the LifeLine program is not an explicit direction of this Evaluation or necessarily under the purview of the LifeLine program directly, it is under the CPUC's purview and has a direct impact on access to a vital service for a population that is eligible yet deeply undersubscribed. The following is recommended:

   a. In collaboration with the Tribal Liaisons, evaluate and make a plan to utilize and leverage all possible resources to develop telecommunications infrastructure for Tribal Nations that desire this utility, including but not limited to the ACP, H.R. 3684 which in totality, includes over $60 billion dollars in direct funding, set-asides and grant programs to fund telecommunications infrastructure and connectivity specifically on Tribal Lands and promotes digital equity for Tribal citizens including opportunities for telecommunications and broadband projects for Tribal Nations. (*Note, there is no funding for infrastructure available via the LifeLine program.)

6. **Increase Coordination with Disability Advocacy Groups to Increase Accessibility and Enrollment.** The LifeLine program is underutilized by TTY users and may also be underutilized by eligible customers with disabilities. Because these customers have specific needs that can be addressed through the LifeLine program, the following is recommended:

    a. Increase coordination and collaboration with disability advocacy groups with the specific goals to:

        i. Better understand the communication needs of various populations with disabilities.

        ii. Identify outreach methods that work best to engage these populations.

        iii. Identify specific improvements that need to be made to allow LifeLine to be more accessible to these populations.

7. **Develop Training Resources to Support Qualifying Benefits Programs, Community Based Organizations, Advocacy Groups and Service Providers in the Promotion of and Education About the LifeLine Program.** Throughout the stakeholder interview and focus group process, many participants requested more information about the LifeLine Program and expressed a desire to promote the program to eligible customers. To support groups who have either a formal or informal role to promote the program, the following is recommended:

    a. Communications Division work with a professional marketing firm to develop short instructional videos explaining eligibility, the enrollment process, answering frequently asked questions, and directing individuals to the CPUC LifeLine website for further detail before engaging with customers and offering the service.

    b. Communications Division make marketing materials available for any stakeholders interested to help promote the program.

8. **Increase the Awareness and Legitimacy of the Lifeline Program Through Community Partnerships with Trusted Sources.** A primary contributor to low enrollments in the LifeLine program is the lack of awareness about the program. However, for program promotion to be successful for the target population, it also needs to come from trusted sources. Stakeholder interviews and focus group participants cited Street Teams as the primary way they were made aware of the program and that Street Teams are not considered a trusted source. Professional rebranding efforts in conjunction with the utilization of trusted sources to market the program can have a significant impact on program enrollment. The following is recommended:

    a. Communications Division work with a professional marketing firm to develop a comprehensive strategy to collaborate and coordinate with qualifying benefits programs, tribal entities, and CBOs to increase awareness of the LifeLine program.

    b. The marketing firm work with subject matter experts within each of the entities listed above to design outreach and marketing efforts that will best meet the needs of each constituency.

    c. Solicit additional state and local agencies, and CBOs to act as "partners" and participate in marketing and outreach, provide different forums for eligible customers to learn about the program, and introduce new methods to streamline the eligibility process through a direct, face-to-face conversation with a trusted agency.

9. **Continue Exploratory Conversations with the Office of Digital Innovation (ODI) or Contract with Another Professional Website Designer to Improve the LifeLine Website Interface to Support Program Operations, Customer Experience, and Use as a Program Marketing Tool.** During this Evaluation period, the Communications Division entered into conversations with ODI to update aspects of the LifeLine website. Improvements to the website and the LifeLine online presence should continue in conjunction with the engagement of a professional marketing firm. The following is recommended for the LifeLine website:

   a. Develop a log-in portal and "dashboard" for LifeLine customers where individuals can access key information about their service, anniversary/renewal date, upload documents and renew online, and track where their application is in the renewal process.

   b. Significantly reduce the amount of text on homepage so that information that is essential to the eligible LifeLine customer is more pronounced and obvious.

   c. Engage users with program-related visuals, including photos, videos and infographics.

   d. Redesign to a more streamlined, modern and clean look.

   e. Enhance navigability and accessibility of key information.

   f. Provide clear, stepwise instructions where a person can quickly determine if they are eligible and learn the program rules.

   g. Ensure accessibility to meet multiple ability and language needs.

   h. Create a section that contains Lifeline and LifeLine related policies and decisions that are simple and easy for the average consumer to locate, navigate, and utilize.

   i. Develop a complementary mobile application.

10. **Improve the Quality of the *Wireless* Customer Experience by Replacing the Street Teams Process with Trusted Legitimate Social Services Sources and CBOs who Direct Verified Customers to the Online Marketplace to Select a Service Provider.** Service Providers regularly cited the costs of administering the program as a barrier. All stakeholder groups agreed that Street Teams had a negative reputation and are reportedly the group that is most associated with fraud and abuse claims. With the combination of redirecting funds away from Street Teams, and the Communications Division investing in marketing materials and branding efforts, Service Providers can reallocate resources to improve the quality of their LifeLine services, and devices and work to compete for customers by delivering a higher quality customer experience.

VI. RECOMMENDATIONS EXPLORED BUT <u>NOT</u> SELECTED FOR INCLUSION

Throughout the Evaluation process, a variety of recommendations from stakeholder interviews, focus group participants, and statewide survey respondents were received but not all were included in the above final recommendations of this Evaluation. While **not** selected for inclusion in the final recommendations, those that appeared with some frequency are described below to provide a more thorough context for the recommendations that are put forward for consideration.

A. Utilize the National Verifier

As noted throughout the Evaluation, nearly all Service Providers recommended that LifeLine utilize the National Verifier to streamline the enrollment and identity verification process. The arguments against including this recommendation were that California prefers to be more inclusive of a broader spectrum of low-income households than the federal Lifeline program currently includes. Several sources stated that amongst those who qualify for the program via income (about 5% of the total population of LifeLine customers) about 400,000 current customers would be eliminated from program eligibility due to the difference between the federal and state income requirements. Ultimately, this recommendation was not included because data-sharing agreements with Social Service benefits programs appears to better accomplish a rapid and easy eligibility verification process without sacrificing any currently income eligible participants.

B. Transfer the Administration of the Program to the Department of Social Services

A variety of recommendations related to a more formalized relationship between Social Services Benefits programs and the Communications Division LifeLine program were received. The spectrum of recommendations spanned from a minimum of providing basic LifeLine information to Social Services Benefits programs to provide to all clients, to completely shifting the program administration over to the Department of Social Services.

It was widely described throughout stakeholder interviews that the LifeLine program is a benefits program being operated by a utility regulator, working with deregulated Service Providers. In part because of this, program implementation is not thoroughly meeting the needs of its target population. However, there are challenges related to the regulatory environment of a utility in which a full transfer of administrative authority to Social Services would create potential complications. That said, there is state government precedent for such large-scale program changes (e.g., state drinking water program reassignment from the Department of Public Health to the State Water Resources Control Board).

As an alternative, there are opportunities in which administration of the program remains in CPUC but in which formal or informal partnerships with DSS and/or CBOs could improve the program reach, implementation processes, and specifically enrollment numbers as well as offer mutually beneficial outcomes for both departments and the low-income Californian's they serve.

C. Require All *Wireless* Providers to Participate in the Program

This recommendation offered during stakeholder interviews was rare but deeply compelling. The rationale behind this is that until there is actual market competition, low-income Californians whom this program is designed to serve will continue to receive marginal service and devices because there is no incentive for Service Providers to provide anything better. The values that underlie the recommendation are not in dispute. However, 1) it is not agreed upon that the CPUC has the authority to require this, and in fact there may be evidence to the contrary 2) there is little evidence

to show that requiring Service Providers to participate in the program will result in improvement in the quality of such services. It could have the opposite effect of a reduction in effort being put into the quality of the program since the market would be more saturated with Service Providers all competing for customers who are the least sought after. Ultimately the conclusion was made that shifting efforts to a system in which customer choice was highlighted could have a larger impact on quality in that, if customers keep choosing a specific provider because the customer service experience, device, plan, or other aspects are better, that is a better outcome than forcing all Service Providers to provide services that do not appear to be regulated beyond a minimum standard.

D. Update Methods to Improve Program Enrollment

The LAO report identified the program enrollment estimating process as an important factor to be assessed by CPUC. Similarly, input from various stakeholders identified estimating accuracy as a concern. CPUC currently conducts an estimate based on parameters outlined by their control agencies through the twice per year ECP. CPUC then coordinates with control agencies on caseload projections. There have been some methodological changes implemented in the past that indicate such changes are feasible however, as noted above, such changes would require involvement and approval of the control agencies and available resources provided to the Communications Division (beyond that which they already receive for their mandated work). Therefore, to further reconcile factors regarding program enrollment estimates, it is important to note such discussion would need to take place not only within CPUC, but to include CPUC and its control agencies.

E. Identify Processes to Ensure High Quality Equipment & Services for LifeLine Customers

Service Providers are not required to provide a device to a customer upon the customer's successful enrollment into the program. That said, all Service Providers interviewed stated that such a practice initially provided a competitive edge for them over other Service Providers and that was effective until nearly all Service Providers began providing free phones. In this context, the LifeLine "market" can be summarized as a suite of generally equivalent mediocre free phones and service offered across all Service Providers that may be useful but not always as a primary service. Many of the customers and stakeholders independently affirmed this by noting that the 'free phones' provided by Service Providers are below adequate and that they do not meet the needs of the average consumer. Many LifeLine customers chose to purchase market rate *wireless* plans and smartphone devices outside of the LifeLine program, a key indicator that the current *wireless* program is not meeting the needs of the eligible population.

While it can be argued that to remain profitable, Service Providers will only offer as competitive a product and service for the subsidy they receive, it is equally reasonable that since the program is paying for up to 6GB data, the Service Providers would provide devices that achieve that minimum requirement of service. Based on feedback received in stakeholder interviews, it is concluded that without being compelled to improve LifeLine offerings, Service Providers have very little incentive or motivation to do so. This conundrum does not have an easy solution that can be implemented by any single organization or collection of organizations. Nonetheless the consumer and potential consumer community that is the target for the program and the reason the program exists is caught between these seemingly irresolvable constraints.

APPENDIX A. Evaluation Methodology

The California Public Utilities Commission (CPUC) contracted with California State University, Sacramento (University) to conduct this Evaluation of their LifeLine program. The purpose of this Evaluation is to provide insights on Californians' use of, and needs for, low-cost phone services throughout the state. Recommendations for increasing program reach and improving program implementation were offered.

To understand the factors influencing LifeLine participation and inform this Evaluation, the University research team conducted background research, collected and analyzed existing program data, and collected primary data through interviews, focus groups, and surveys.

A comprehensive list of research questions used to guide the Evaluation and development of this report is included as the last section of this Methodology.

BACKGROUND RESEARCH AND DATA COLLECTION

LITERATURE REVIEW

A literature review was conducted to review historical trends in participation for the federal Lifeline and state LifeLine programs as points of comparison, and to understand legislative decisions affecting program implementation. Relevant studies on factors that influence "take up" of qualifying public benefit programs were also reviewed.

BACKGROUND INFORMATION COLLECTION

Information and available data regarding the history of LifeLine, current implementation, policy and regulations, telephone Service Provider plans and customer data, as well as low-income qualifying utility programs was collected and summarized. Much of the material was accessed via the LifeLine page of CPUC's website[119] including data from past and present third-party administrators (TPA). The related CPUC Consumer Affairs Branch (CAB) webpage[120] was also examined.

LIFELINE ENROLLMENT DATA COLLECTION AND ANALYSIS

LifeLine monthly enrollment data was made available by the current TPA, Maximus (Monthly reports from July 2020 to June 2021). These reports included summary tables related to customer qualifications, approvals/denials, eligibility verification, enrollment entries and exits, application summaries by service providers, as well as call center activity and mailing reports. This data was analyzed to look at trends and overall enrollment activity throughout the year. Note that for some of the fiscal year data, renewals were suspended so some annualized data are not comparable to previous years. Conversations with TPA's data team were conducted to understand how this information is collected in the LifeLine application and validation processes. University researchers also requested individual customer-level data related to enrollments and demographic details, however much of this data was not available.

University researchers requested a comprehensive list of current LifeLine customers in July 2021 for the purpose of administering the statewide survey. This survey set included customer language, zip code, TTY status, and Tribal status. This data set was also used for the "Point-in-Time" analysis to determine enrollment rates statewide, and regionally, by subscriber characteristics.

119   *https://www.cpuc.ca.gov/LifeLine/*
120   *https://www.cpuc.ca.gov/cab/*

STAKEHOLDER INTERVIEWS AND FOCUS GROUP DISCUSSIONS

Qualitative research to better understand peoples' opinions, insights and experiences with the LifeLine program was conducted via a standardized, confidential information gathering process utilizing interviews and focus group discussions with representative stakeholders. The information was then combined, and key themes, trends, conclusions, and recommendations were reported in this Evaluation.

More specifically, interviews and focus groups were conducted with enrolled and eligible LifeLine customers, community stakeholder groups serving low-income households eligible for LifeLine, state agencies and social service programs serving the eligible population, Tribal government assistance programs, telephone Service Providers, CPUC Communications Division staff, the TPA, and individuals participating in various LifeLine Working Groups and/or committees.

University maintained a master list of stakeholders to ensure stakeholder groups were adequately represented in the interview processes. Information including name, affiliation, organization/agency location and description, communities and demographic populations served, leadership and staff contact information, was collected. Similar information was collected for focus group design and participation.

Consistent with University commitments to neutrality and confidentiality, while a master list of all persons participating in interviews and focus groups was compiled, no attribution, nor direct documentation of any comments to any specific person was communicated in University deliverables to CPUC, including this Evaluation.

STAKEHOLDER INTERVIEWS

Stakeholder interviews were conducted via the Zoom web-based virtual meeting platform. Each interview lasted approximately 60-90 minutes and was guided by a standard set of questions shared below, with select questions tailored to various stakeholder categories. The Evaluation was originally scoped for up to 15 interviews. However, due to significant changes in the focus group structure due to COVID, there was a clear need to expand the individual interview effort to ensure accurate representation of insights, experiences, and opinions about the LifeLine program was obtained. Ultimately, 93 individual stakeholder interviews were conducted between April and November 2021.

Individuals representing the following organizations and agencies were included in the stakeholder interview process:

- Access Wireless
- Assurance Wireless
- AT&T
- CalAdvocates
- California Alternate Rates for Energy (CARE) Program
- California Community Foundation, Los Angeles
- California Department of Community Services and Development
- California Department of Correction and Rehabilitation
- California Department of Social Services
- California Department of Social Services, CalFresh Program

- California Health Policy Strategies, LLC
- California Low Income Home Energy Assistance (LiHEAP) Program
- California Native Vote Project
- California Public Utilities Commission, Commission and Commission Staff
- California Public Utilities Commission, Communications Division
- California Public Utilities Commission, Consumer Affairs Branch
- California Public Utilities Commission, Consumer Working Group
- California Public Utilities Commission, LifeLine Working Group
- California Public Utilities Commission, Low Income Oversight Board
- California Public Utilities Commission, Renewals Working Group
- California Public Utilities Commission, Service Provider Working Group
- California Public Utilities Commission, Universal LifeLine Telephone Service Committee
- California State Assembly, Communications and Conveyance Committee
- California State Senate, Energy, Utilities, and Communications Committee
- California Supplemental Nutrition Assistance (SNAP) Program
- California Welfare Directors Association
- Catholic Charities
- Consumer Action Network
- Contra Costa Health Services
- Cox Communications
- Department of Social Services, Lake County
- Department of Social Services, Napa County
- Department of Social Services, Riverside County
- Department of Social Services, Sacramento County
- Department of Social Services, Tuolumne County
- Department of Social Services, Tulare County
- Department of Social Services Ventura County
- FCI Management Consultants
- Foundation for California Community Colleges
- Frontier Communications
- Greenlining Institute
- Greenville Rancheria Health Center
- Grid Alternatives
- Human Services Agency, San Francisco
- Ideate Labs
- Legislative Analyst's Office
- Maximus
- Moreable

- National Lifeline Association
- North Fork Rancheria Indian Housing Authority
- Pit River Tribe
- Proteus, Inc.
- Sebastian Corp
- Self Help for the Elderly
- Southeast Community Development Corporation
- Southern California Edison
- Southern California Tribal Chairmen's Association
- StandUp Wireless
- SupplyBank.Org
- Suscol InterTribal Council
- Tenderloin Housing Clinic
- The Center for Accessible Technology
- The Utility Reform Network
- Tracfone
- Tribal Administration for Children and Families (Tribal TANF)
- TruConnect
- TruCourse
- United Way, Central Coast
- University of California Davis

The following set of standard questions were used to guide stakeholder interviews:

1. Please briefly tell us about your organization and the populations you work with.
2. Have you ever heard of the California LifeLine Program (LifeLine)? [Or, are you aware of the state program that helps low-income households pay for phone service?]
3. Generally, do the individuals you work with use landlines or cell phones?
4. What impacts have you observed on households that do not have access to a phone or internet?
5. Do you think there are specific populations that might have less awareness of the LifeLine Program? Why?
6. Why do you think someone who is eligible would not enroll in the program?
7. Are you aware of any other subsidized or reduced rate phone programs/services?
8. In your experience, what information is useful to encourage eligible participants to enroll in programs such as LifeLine?
9. To enroll people in the program, what do you think is the most effective method(s) to engage/communicate with eligible participants?
10. Who/what are trusted sources for information for these communities/populations?
11. What languages should informational material be developed in?

12. What are the pressures on participants that can get overlooked when programs/services like LifeLine are set up?
13. Have you ever helped someone through the LifeLine enrollment AND/OR re-enrollment process?
14. With the population you work with, do you offer resources/information about other programs or services?

STAKEHOLDER FOCUS GROUPS

Focus groups refers to small gatherings of stakeholders that met with University researchers: currently enrolled LifeLine customers, and/or eligible households that were willing to discuss their knowledge about, and experience with, the LifeLine program. Focus group preparation was informed by each researcher through background document review, stakeholder interviews, and planning discussions with staff from CPUC and local/regional non-profit and community-based organizations representing the eligible population.

Each customer or eligible customer participating in a focus group was asked to provide basic demographic and eligibility data:

- Age range (18 - 25) (26 - 35) (36 - 49) (50 - 65) (65 - 75) (76+)
- Zip code
- Are you currently a *wireline* or *wireless* LifeLine customer?
- How long have you been enrolled in the program?
- Which other benefits programs are you enrolled in?
- If you are not enrolled in LifeLine or subscribed to a benefits program, what is your annual income (to verify eligibility).

The following set of common questions/ topics were prepared as the basis for each focus group discussion:

1. Tell us what you know about the LifeLine Program.
2. What do you like about the LifeLine program?
3. Why did you choose NOT to enroll in the program? Or what have you heard are the reasons people don't enroll?
4. In your experience, what information or service offerings would be useful to encourage eligible participants to enroll in LifeLine?
5. In your experience, what do you think is the most effective method(s) to engage/ communicate with eligible participants about LifeLine?
6. Who/what are trusted sources for information for you and others who are eligible to enroll?
7. What are the pressures on participants that can get overlooked when programs/services like LifeLine are set up?
8. What was the enrollment process like?
9. What was the re-enrollment/recertification process like?
10. What changes have you heard about or noticed with the LifeLine program since you have been enrolled?
11. How have these changes impacted your overall satisfaction with the LifeLine program?

12. Do you feel your LifeLine plan is equivalent to a market rate plan from a leading Service Provider?

13. Do you feel like your LifeLine device is equivalent to a market rate device from a leading Service Provider?

14. Do you feel like the LifeLine customer service you receive is equivalent to a market rate service from a leading Service Provider?

15. How often do you see "street teams" (booth, tent, kiosk) in your community?

16. How comfortable do you feel enrolling in a reduced/subsidized phone plan through a "street team"?

Up to 16 participants were included in each focus group discussion, and sessions lasted 90 to 120 minutes. The facilitator of each session made real-time decisions regarding how to distribute and emphasize certain questions towards different focus group contributors. Time allotted did not allow for each participant to answer each question. Discussion notes were compiled and summarized for key themes, trends, conclusions, and recommendations.

To recruit focus group participation, the University worked with several representatives from community-based organizations and Service Providers listed above to help publicize and to identify persons willing to participate. Multi-lingual (English, Spanish, Cantonese, Mandarin) focus group flyers and associated materials were generated to aid in outreach and recruitment.

Focus group recruitment was challenging due to the ongoing COVID pandemic. Anticipated in-person discussion sessions across the state were cancelled in the interest of public health, and seven of the eight sessions were facilitated via remote meeting platforms. One session was conducted and facilitated in Cantonese and Mandarin by partnering organization, Self Help for the Elderly, in person at their location in San Francisco. A debrief with University researchers as well as s summary of the focus group discussion was provided.

Nine sessions were completed in July - August 2021, engaging a total of 61 individuals, and included:

- Five sessions with enrolled and/or eligible LifeLine customers
- Two sessions with telephone Service Provider staff
- Two sessions with California Department of Social Services Benefits Directors

SERVICE PROVIDER ONLINE SURVEY

A brief online survey was developed to assess the following questions and data needs: Service Provider staff knowledge of LifeLine, if Service Providers offer comparable service plans, if they conduct marketing/outreach to boost enrollment in LifeLine, and to gain a general understanding of how simple or complex their enrollment process is. The survey consisted of 17 single or multiple-choice questions and three open-ended questions, took approximately 5-10 minutes to complete, and was translated into Spanish (See Appendix I for Service Provider Survey form and questions).

Two email invitations to participate in this survey was sent to all Service Providers participating in the LifeLine Service Provider Working Group (approximately 85 persons) in June 2021. These contacts were encouraged to share the survey link with staff and colleagues at their companies. The survey remained open for three weeks. Twenty-four responses were collected. Results were summarized and referenced throughout the Evaluation.

STATEWIDE CUSTOMER SURVEY

A customer/eligible customer survey was developed to further understand customers' experiences with the LifeLine program and to gather information about phone access from eligible non-LifeLine participants. The comprehensive survey instrument is available for refernce in Appendix J.

Survey Development

The survey instrument was informed by background research on social services benefit programs and telecommunication services, along with interviews with phone Service Providers, customer stakeholder groups, CPUC Communications Division Staff, and the third-party administrator (TPA) Maximus. The survey questions address the following key areas:

- Frequency of use and primary functions of LifeLine service
- Length of time with phone Service Provider
- Features of LifeLine phone plan
- Satisfaction with LifeLine phone plan and plan phone (for *wireless*)
- Suggested improvements for Lifeline program
- Demographic profile of households
- Phone access and usage of households

The survey was designed to be completed in approximately 10 to 12 minutes, and questions were developed at a 6th grade reading and comprehension level. The survey was field tested for readability, clarity, and length. The survey was also translated into Spanish. English and Spanish speakers make up over 98 percent of the current *wireless* subscriber population.

Survey Modalities and Recruitment

The survey was administered as both an online survey as well as a telephone survey in order to reach the widest possible audience and to reduce overall burden to respondents.

Current Wireless Customers | *Wireless* customers were sent a text invitation from the TPA which included a weblink to participate in the online survey. The online survey was administered using the Qualtrics Research Suite online survey platform to optimize access for smartphones.

Current Wireline Customers | *Wireline* customers were called and invited to participate in a telephone survey. The phone survey was administered using the IdSurvey Computer Assisted Telephone Interviewing (CATI) platform. Respondents were contacted using a list of current *wireline* subscribers provided by the TPA. Data collection for the phone survey took place in real-time with interviewers asking questions and entering data directly into the CATI program. Up to five call attempts were made for each contact. Respondents were provided with the option of completing in English or Spanish depending on language preference. All call records flagged as Spanish speaking were automatically routed to Spanish bilingual interviewers for completion.

Individuals Not Participating in LifeLine | Previous Lifeline customers or individuals who had never participated in the program were recruited through an invitation posted on the homepage of the California LifeLine website (https://californialifeline.com). Any visitors to the website who were interested had the option of clicking on the invitation and taking the online survey. This administration method was implemented in an effort to reach non-LifeLine users who might be visiting the LifeLine website to re-enroll or to learn more about the program.

Survey questions and content were identical across the different survey administration methods.

Sampling

The sampling for current customers was based upon their resident zip code and sample was distributed over ten regions of the state as defined by the US Census. This approach was used to ensure proportional customer representation throughout the state. The TPA provided a list of customers who were active in July 2021 which represented a 'point-in-time count' of the LifeLine customer base. The list of customers was cleaned, deduplicated based upon phone number, and assigned a regional code. Customers that enrolled in languages other than English and Spanish were removed for the purposes of the online survey. This resulted in a total sample for the survey of 1,258,853 customers (1,048,567 *wireless* and 210,286 *wireline*).

The research team determined that a minimum of 2,500 completed surveys would be needed to ensure a representative sample of *wireless* customers. Based upon an anticipated response rate of one percent, the research team drew a sample consisting of 277,412 randomly selected *wireless* subscribers. The sample was drawn considering the total number of subscribers across California's 10-region geography. In addition to the randomly selected subset of participants, the sample draw also consisted of all customers identified as "Tribal" and "TTY", as well as all subscribers in Region 2 (the North Coast) that had a proportionally smaller number of customers compared to the other regions. A similar method was used to draw the sample for the population of current *wireline* subscribers. As a result, 4,343 current *wireline* customers were sampled to participate in the phone survey.

Survey Procedures and Incentives

All respondents were informed at the beginning of the survey that their participation was voluntary and that they had the right to drop out at any time. Respondents were informed how long the survey would take, that their responses would be entirely confidential, and that results would only be reported in aggregate.

All individuals who agreed to participate in the survey, regardless of modality, were given the opportunity to enter a raffle for a chance to win one of ten $100 gift cards. Respondents were informed that their contact information (i.e., phone number) would be collected at the end of the survey if they chose to enter the raffle. Lastly, respondents were told when the raffle would be taking place and how they would be contacted if their name was selected in the random drawing.

The research team implemented a dedicated phone line and email address to take incoming calls and provide support for those experiencing technical difficulties during data collection. All inquiries were addressed within 24 hours of receipt. The research team also provided the LifeLine call center with a comprehensive list of scenarios designed to address most inquiries that they might receive regarding the survey and its administration.

Data Collection Summary

The summary table below details data collection dates, sample sizes and response rates across the three survey modalities.

Administration	Data collection dates	Sample Size	Total Completes	Response Rate
Text invitation web survey	8/26/21 – 9/27/21	277,412	4,481	1.6%
Phone survey	8/31/21 – 10/8/21	4,343	305	7.0%
LifeLine web invitation web survey	8/24/21 – 10/13/21	NA	396	N/A
Total # of Completed Surveys			**5,182**	

Across the three survey administrations, 262 individuals or five percent of the respondents completed the survey in Spanish.

Survey Limitations

Survey findings are presented in this report as descriptive statistics and are not weighted to reflect response bias, for example across race/ethnicity or household characteristics. Demographic data is not collected in the enrollment process and therefore weighting for these characteristics was not possible. LifeLine customers enrolled in the program in languages other than English and Spanish were not included in the samples.

LIFELINE PARTICIPATION RATES

The number of LifeLine participants were used from the July 2021 point in time enrollment totals. Current participation rates in this report were developed using the same methodology used by the national Lifeline third party administrator, Universal Service Administrative Company (USAC). The participation rate is equivalent to [total number of participants]/[total number of eligible households]. The total number of eligible households are estimated by using the 2019 American Community Survey 1-year data based on the income poverty threshold. Note that in the California estimates, a household income threshold of 150% of the federal poverty line (FPL) was used which aligns with the state's eligibility criteria (USAC uses 135% of the FLP). Households not meeting the income eligibility criteria were also identified if anyone in the household participated in a public benefit program (Medi-Cal; CalFresh; Public Assistance Income; and/or Supplemental Security Income) over the past 12 months. The methodology for estimating the number of non-English speaking households eligible for participation was the same as above and also were identified as "Limited English Speaking" by the ACS[121] (i.e., "no one in the household 14 years of age or over speaks English only or speaks English 'very well'").

COMPREHENSIVE LIST OF RESEARCH QUESTIONS

A comprehensive list of research questions was developed at the onset of this effort to guide data collection efforts described above and inform the Evaluation. Research questions were organized by key issue identified in the Legislative Analysts' Office report. Some general alignment with the organizational structure ultimately applied to this report is realized.

MARKET COMPETITION

1. What wire and land line services are available to LifeLine program customers by region?

    *   Which telephone Service Providers participate in the Program?
    *   What is the proportion of telephone Service Providers in the state that participate in the program?
    *   What is the cell coverage of *wireless* plans (e.g., geography)? Which areas are not covered by any program cell service?
    *   How does that translate in terms of the overall Service Provider markets (e.g., population)?
    *   What are the actual plans currently available to LifeLine customers and how do these differ from non-Program plans? (i.e., better plans for data/speed, costs, service reliability, coverage etc.)?

2. What has been LifeLine telephone Service Providers' experience with offering the program to their customers?

    *   Why does the Service Provider participate in the program? What is their motivation/ incentives?
    *   What is the process for Service Providers to offer the program?
    *   What is the documentation requirement for the Service Provider and the customer to participate in LifeLine?
    *   What has been the Service Provider experience in the administration of the program?
        *   With TPA?
        *   With CPUC?
        *   Other agencies?
    *   From a Service Provider perspective, how could the program be improved?
        *   engage more Service Providers?
        *   reach more customers?

3. Why are telephone Service Providers not participating in the LifeLine program?

    *   Why doesn't the Service Provider participate in the program?
    *   What would incentivize the Service Provider to participate?
    *   Why did former Service Providers discontinue participation in program?

4. What marketing and outreach is done?

    *   What type of "screening" or "prompting" does Service Provider conduct for customers who are unaware of the program but might be eligible?
    *   What marketing and outreach is required for Service Providers who participate in the program?
    *   What types of outreach/promotion/communication does the Service Provider conduct for the program?
    *   What triggers outreach?

- What "branding" is used by each Service Provider for marketing and outreach of the program?
- What methods are used for outreach?
- What materials are used by each Service Provider?
    - Are they consistent across Service Providers?
    - Are they consistent with the requirements of LifeLine?
- Which languages are used for outreach?
- Which government or non-government agencies does Service Provider partner with to conduct outreach?
- What metrics are available to evaluate success of outreach efforts?
- Which marketing and outreach methods have been unsuccessful?

5. How is outreach conducted by other stakeholder programs/agencies (i.e., those serving eligible populations), by region?
    - Is the stakeholder aware of the program? In the stakeholders' experience, is the program well known among the eligible population?
    - What is the eligible populations feedback on the program?
    - Does the stakeholder conduct any formal promotion/outreach of the program?
        - For example, what types of information material are provided to potential customers? What languages are these in?
        - What type of support/assistance is provided for enrolling in the program?
        - Does the stakeholder regularly screen for telephone access/program eligibility?
        - Does the stakeholder have any formal partnerships/relationships that promote the program (e.g., with local Service Providers or other agencies or community-based organizations)?
    - In the stakeholders' experience, what is the best way to conduct outreach to the populations they serve?
    - Are they aware of any challenges or barriers for customers enrolling in the program?

LIFELINE ENROLLMENT AND RENEWAL PROCESSES

1. How does a customer enroll in the LifeLine Program?
    - How do customers become aware of their eligibility?
    - How does this process work in terms of online and paper enrollment?
    - How is the applicant's eligibility verified?
    - Who is responsible for enrollment?
        - What would it require to allow other entities to participate in/complete enrollment?
    - What supports are available in helping customers successfully complete their enrollment?
    - What languages are enrollment materials available in?

2. What has been TPA' experience/role in the LifeLine program administration?
    - In their experience,
        - What has been working well?
        - What have been the challenges?
        - What improvements can be made?
3. What have been the enrollment and re-enrollment trends over the last three years?
    - By region
    - By Service Provider
    - By population characteristics (e.g., household income figures or other demographics)?
    - By eligibility program
    - What data are available for land and wire line as well as paper versus online enrollment re:
        - Successful enrollment upon initial attempt
        - Successful enrollment after initial denial
        - Renewal rate
4. What has been the impact of recent CPUC actions to improve enrollment and renewal?
    - What has been done to encourage participation from Service Providers with greater brand name recognition?
        - What have those changes been?
    - What has been the impact of allowing online enrollment option through Service Provider website?
        - What have those changes been?
    - What has been the impact of outreach and coordination with CBOs and other entities?
        - What have those changes been?

PROGRAM AWARENESS AND CUSTOMER EXPERIENCE

1. What is the experience of LifeLine program Customers?
    - How did they learn about the program?
    - How did they experience the enrollment and renewal process?
        - Paper versus online?
        - In what ways can this process be improved?
    - How satisfied are they with the LifeLine telephone Service Provider?
        - With the plans available?
        - With the discount provided?
        - With the quality of the phone coverage?
        - With customer service?
        - How could the program be improved?
    - Would they be using a different Service Provider if the program was available?
    - Does the customer currently have internet service in their home?
    - Does the customer plan to renew? If not, why?

2. Why are eligible customers not participating in the LifeLine program?
   - Are they aware of the program?
   - Have they ever participated and left?
     - If they left, what were the reasons?
   - What would motivate/incentivize them to participate in the program?
   - What is their current phone plan (or do they have a phone)?
   - To what extent does the minimum usage requirement impact participation?
     - What percentage of customers get dropped for failing to meet minimum usage requirements?
     - How does this impact their desire to re-enroll?

PROGRAM POLICY IMPLEMENTATION AND IMPACTS

1. How is the LifeLine program serving the state's eligible population?
   - What percent of households in California (and by region) do not have access to a phone?
   - What is the Program participation rate in the state and regionally vs. eligible population?
     - By qualifying program eligibility
   - Are there certain demographics that are over or under enrolled? (i.e. older adults, Spanish speakers, rural customers etc.)
   - How much in reimbursements/customer savings is provided to the state and by region?
2. What federal or state policies have been issued during this Evaluation?
   - What influence did those policies have on the Evaluation?
   - How did the October 8, 2020 decision influence the Evaluation and Program in each of the following areas:
     - Website transparency: Update of CPUC website to increase visibility of program offerings by service providers. Comparison of plans across service providers should be easier for all to see.
     - *Wireline* Voice and Bundled Broadband Service: The plan subsidy may now be applied to" 1) voice, 2) VoIP services, or 3) fix broadband bundled with *wireless* voice services or VoIP services that connect to the Publish Switched Telephone Network. Service Providers may now provide more bundled plans that are lower cost than market rate bundled broadband.
     - *Wireless* customers may see bill increases as CPUC only covered $2 of the $4 federal subsidy decrease.
     - Wired Measured Rate Customers: Retires LifeLine measures rate entirely by the end of May 2021. CPUC will stop paying Service Providers more than $14.85 in December 2020? Or 2021? which may increase cost for customers.
     - Requires Service Providers to notify customers of alternative options including a shift to the LifeLine flat rate plan.
     - Provides a $2 bill credit for 6 months to customers who opt-in to LifeLine program flat rate plans to offset the increase cost of flat rate plans. Customer transfer to flat rate will probably incur increased monthly costs and the $2 bill credit provides partial coverage. Service Providers may not charge a transition charge.

- Customers who do not opt-in to LifeLine program flat-rate plans by the end of May will be pushed over to market rate plans. Forcing customers to adopt a new plan is in violation of telecommunication policy. Consequently, the Decision does not require service providers to move customers, but this creates challenges in implementation.
- Opt-out plan scan have as little participation as 15%. So, 85% of measures rate Program participants may be shifted out of the program into a market rate plan if they do not choose to opt-in. There may be a flood of calls leading up to that time.
- Creates new plans for *wireless* customers effective December 1, 2021.

3. What are the policy recommendations to increase awareness participation/service to eligible populations?
   - Recommendations for CPUC Program oversight
   - Recommendations for Service Provider Program guidelines and incentives
   - Recommendations for Program outreach
   - Recommendations for Program enrollment and renewal
   - Recommendations for Program partnerships

APPENDIX B. Summary of Significant Policy and Program Changes to LifeLine from 2014 Through Spring 2022

Implementation of the California LifeLine program is regulated by _General Order (GO) 153_, effective December 1, 2011. Updates to regulations are made via the CPUC rulemaking process. Significant changes in LifeLine policy and program implementation occurring over the last eight years, with specific focus on those occurring over the course of this Evaluation period are summarized below.

Significant Federal Lifeline and California LifeLine Policy Changes
JANUARY 2014 – AUGUST 2018

January 2014 | Decision 14-01-036 | _Modernization and Expansion of the California LifeLine Program_

Program revisions include extending the price cap on LifeLine _wireline_ services and adopting specifications for LifeLine _wireless_ services.

- Protects customers across technology platforms by assuring minimum communication needs are met regardless of income.
- Developed rules allowing the addition of _wireless_ services to the California LifeLine Program.
- Allows, but does not require _wireless_ Service Providers (SPs) to participate in LifeLine. This translates into more SP options for those who qualify.

March 2016 | FCC-16-38A1 | _FCC Modernization for Digital Age_

The Order federal Lifeline support on broadband to ensure Lifeline subscribers receive services meeting 21st Century needs. New rules build on 2012 reforms in the program to combat waste fraud and abuse (WFA) and increase program efficiency.

The FCC further adopted minimum service standards for the Lifeline program and a process by which those standards would increase over time to ensure that the supported service would "remain robust as technology improves." Paired with the minimum service standards, the FCC also defined a process to phase down support for voice-only services so funding would be focused on supporting broadband internet access service. The FCC adopted the following gradual reduction of the Lifeline support amount for voice-only services from $9.25 to $0:

- Bundling voice services with broadband services.
- Reduced federal monthly support from $9.25 to $7.25 for service plans that do not meet broadband service standards, on December 1, 2019.
- Reduced federal support from $7.25 to $5.25 for service plans that do not meet broadband service standards, on December 1, 2020.
- Eliminated federal support for service plans that do not meet its broadband service standards on December 1, 2021.

January 2017 | Decision 17-01-032 | _Harmonized Program in Accordance with AB 2570 and the FCC's Third Report and Order_

Modifies the CA LifeLine Program to harmonize with elements of the newly revised federal Lifeline program. (Note: The full list of changes is extensive)

- Aligns LifeLine with federal changes, which modernizes and expands LifeLine offerings for _wireless_ customers.
- Decisions made on discounts and reimbursements for service connection/activation.
- Removed the expiration date for reimbursements for service connection/activations charges for LifeLine _wireless_ services.
- Maintained $39 price for reimbursements for service connection/activation charges for LifeLine _wireless_ service while also clarifying conditions applicable for reimbursements.
- Implemented other changes as mandated by Assembly Bill 2570 approved by Governor in September 2016.

- Implemented an enrollment freeze for new *wireless* customers, prohibiting change of carrier within the first 30-day period.
- Provides protection against multiple enrollments.
- Adopts a state-specific portability freeze rule for the program. (This impacts senior citizens and persons with disabilities).
- Requires customers to remain enrolled with the same LifeLine service provider for 60 days in order to continue receiving California LifeLine discounts unless the LifeLine participant qualifies for at least one of the exceptions to the benefit portability freeze.
- Changes to the eligibility criteria aligning California eligibility criteria with Federal Criteria.
- Including reducing income requirement to 135% of FPL, adoption of Veterans and Survivors Pension Benefit Program, and removal of California-specific programs.

August 2018 | [Decision 18-08-027](#) | *Modifies Portability Freeze*

This Decision modifies the policy and requirements for the California Universal Telephone Service's (California LifeLine) benefit portability freeze. The CPUC reduces the benefit portability freeze's duration from 60 days to up to 24 hours and eliminates the exceptions to the California LifeLine benefit portability freeze.

- Helps ensure carriers continue to qualify for federal LifeLine support-approximately $234 million in 2016.
- Helps maintain competitive service offerings and consumer choice.
- Harmonizes with FCC elimination of the 60-day portability freeze.

Significant Federal Lifeline and California LifeLine Policy and Programmatic Changes
MARCH 2020 – JUNE 2022

March 2020 | [Decision 20-05-043](#) | *Suspension of Renewals to Address COVID Pandemic*

This decision affirms the temporary suspension of the renewal process for the California Universal Telephone Service Program in order to ensure continued access to affordable communications services during the COVID-19 emergency, effective on March 19, 2020 and continuing for 90 days thereafter. In addition, (a) the temporary suspension of the renewal process may be extended for so long as the renewal processes of other state public assistance programs remain suspended due to the COVID-19 emergency, (b) the non-usage rule and program enrollment rules may be temporarily suspended in response to the COVID-19 emergency for so long as the Federal Communications Commission suspends such rules for its Lifeline program, and (c) providers may be reimbursed for the federal subsidies that they are unable to collect as a direct result of the Program's suspension of the renewal process beyond the federal suspension period.

May 2020 | California LifeLine Monthly Updates

- **2020-05-14** Distribution of reports to SPs of their active subscribers with anniversary dates to support SPs outreach efforts to subscribers who will need to renew their benefits. As the renewal process suspension continued to be suspended, Service Providers were instructed how to use the on demand true up reports to monitor adjusted anniversary dates for their subscribers.

June 2020 | California LifeLine Monthly Updates

- **2020-06-11** Splitting the review task queue into application and renewal task queues which offers TPA Operations the ability to assign reviewers based on the type of task volume. This will be of particular importance during the first months following resumption of the renewal process.

July 2020 | California LifeLine Monthly Updates

- **2020-07-10** Distribution of reports to SPs of their active subscribers with anniversary dates to support SPs outreach efforts to subscribers who will need to renew their benefits.

August 2020 | California LifeLine Monthly Updates

- **2020-08-06** Introduction of a Rapid Review Queue, that allows a more efficient review of renewal forms by using artificial intelligence to validate key data fields.

- **2020-08-03** and **2020-08-17** Distribution of reports to SPs of their active subscribers with anniversary dates to support SPs outreach efforts to subscribers who will need to renew their benefits.

September 2020 | California LifeLine Monthly Updates

- **2020-09-16** Additional text outreach to *wireless* subscribers during the renewal process – day 0 and 35 texts with exposed PIN.

- **2020-09-02** Distribution of reports to SPs of their active subscribers with anniversary dates to support SPs outreach efforts to subscribers who will need to renew their benefits.

October 2020 | [Decision 20-10-006](#) | *Establishes Specific Support Amount and Minimum Service Standards*

Decision establishing specific support amount and minimum service standards for CA LifeLine.

The California Universal Telephone Service Program fund is authorized to replace the $2.00 reduction of monthly federal support for *wireline* Program service plans from December 1, 2020 through November 30, 2021.

October 2020 | California LifeLine Monthly Updates

- **2020-10-29** Enhancement of the existing CheckCustomerStatus Direct Application Processing (DAP) method to inform *wireless* SPs that a potential transferring subscriber needs to complete his/her renewal

- **2020-10-16** Distribution of reports to SPs of their active subscribers with anniversary dates to support SPs outreach efforts to subscribers who will need to renew their benefits.

November 2020 | California LifeLine Monthly Updates

- **2020-11-3** Distribution of reports to SPs of their active subscribers with anniversary dates to support SPs outreach efforts to subscribers who will need to renew their benefits.

December 2020 | California LifeLine Monthly Updates

- **2020-12-10** Re-ordering the presentation of qualifying assistance programs in the interactive voice response (IVR) for renewing subscribers so programs that qualify for federal and state subsidy are presented first.

- **2020-12-10** Targeted IVR messaging to IVR users who are within 10 days of the start of their renewal processes.

- **2020-12-23** Revamping the presentation of the renewal form on the public website to offer a more user-friendly experience.

January 2021 | California LifeLine Monthly Updates

- **2021-01-21** Functionality that allows subscribers to set their own PINs and to retain those codes for as long as they are on the Program

- **2021-01-21** Functionality that allows subscribers to request a responsive text message that includes their PINs.

May 2021 | California LifeLine Monthly Updates

- **2021-05-31** In support of WFA efforts, the third-party administration (TPA) terminated service for 14,477 active service terms that were identified using 10 targeted queries as receiving multiple LifeLine benefits in violation of Program rules. Additionally, the TPA implemented adjustments that identifies more duplicates at intake.

- **2021-05-31** LifeLine measured rate retired entirely to make plans equitable across carriers.

June 2021 | RULEMAKING 20-02-008 | *Pandemic Renewal Suspension through 9/30/21*

- Anniversary dates were adjusted for ~1.5 million LifeLine customers to accommodate the extension of the renewal process suspension through 2021-09-30.

- Deployed June 30, 2021

June 2021 | California LifeLine Monthly Updates

- **2021-06-01** Measured rate service was disabled as an acceptable California Service Tier for *wireline* SPs

- **2021-06-16** Distribution of SP-specific lists of 25,236 subscribers with active undeliverable mail flags to support SP outreach efforts to update mailing addresses before renewal processes resume.

- **2021-06-30** Deployed changes designed to enhance TPA system checks that prevent consumers from receiving multiple simultaneous LifeLine benefits (WFA)

- **2021-06-30** Added information on the Renew Online public website page: *"If you are a renewing wireless LifeLine subscriber and do not know your PIN, text GETPIN from your LifeLine phone to 345345. We will text your PIN to your LifeLine phone"*

June 2021 | ADMINISTRATIVE LETTER | *Advice Letters Regarding EBB Plans for LifeLine Participants*

Administrative Letter re: Emergency Broadband Benefit (EBB) providing guidance to SPs regarding the need to submit advice letters regarding EBB plans for CA LifeLine participants, how to submit claims for subsidy, how the TPA would administer program subscribers who are receiving EBB and Alternate Verification Processes.

July 2021 | California LifeLine Monthly Updates

- **2021-07-01** Activation of CA Service Tier 0 which designates Program subscribers who are participating in EBB plans approved by Universal Service Administrative Company (USAC) for which SPs will not seek reimbursement from the CA LifeLine Fund.

- Beginning **2021-07-15** the frequency of USAC True Up reports was changed from once monthly on the 1st calendar day of the month to twice monthly (1st and 15th calendar days)

- Ongoing work with USAC to provide active subscriber reports that could be quickly ingested into USAC's system to support Emergency Broadband Benefit (EBB) enrollments.

- Ongoing discussions with USAC to try to overcome the independent economic household (IEH) obstacle SPs were reporting when attempting to enroll CA LifeLine subscribers in EBB.

July 2021 | California LifeLine Monthly Updates

Website

- **2021-07-13** The COVID Relief Measures FAQs presented on the public website were revised to align with the extension of the renewal process suspension through 2021-09-30

- **2021-07-15** The new URLs for the CPUC's new website needed for the public website were identified. During the 2021-07-16 maintenance window the public website links were updated.

Other

- **2021-07-15** TPA reported to SPs that a dedicated TPA team is manually reviewing a daily report of potential duplicates that cannot be resolved systematically.

- **2021-07-16** The first USAC-provided list of "potentially deceased" subscribers was segregated into SP-specific reports and distributed to SPs. (WFA)

CalFresh Confirm

- **2021-08-12** To conduct intensive pre-deployment testing with CalFresh Confirm SPs were informed:

  (1) First names should not be abbreviated. Examples: Robt., Jas., Jos., J, S, etc.

  (2) Numbers should not be sent in the First Name or Last Name fields. Examples: Smith III, Jones 2nd, Banks 4. Name suffixes such as Jr, 2nd, II should be submitted in the NameSuffix field. (3) Avoid the use of special characters in Name fields. Examples: **sa Shaw** Custadoro, Aguirre/Ayala, Johnson-Thomas, MARÍA, PEÑA (4) The subscriber should be an individual not a couple: E & T, ROBT. & ELEANOR, Diane/Sam

Other

- **2021-08-13** A 20,000-record limit was imposed for daily upload files from SPs. The purpose of the daily limit was to ensure the efficient processing of daily files for all SPs.
- **2021-08-26** The frequency of reporting active CA LifeLine subscribers to USAC was increased to weekly. USAC requested the inclusion of fewer data fields in the weekly reports to expedite ingestion time.

September 2021 | FCC Order DA 21-1191 | *Pandemic Renewal Suspension through 12/31/21*

- The Pandemic renewal suspension was extended from 2021-09-30 through 2021-12-31.
- **2021-09-29** The TPA moved anniversary dates for all subscribers to align to extension of the renewal process suspension through 2021-12-31.

September 2021 | Decision 21-09-023 | *Revises GO153*

- Requires Tier 2 Advice letter from *wireless* service providers to costumers detailing service rate changes at least 30 days prior to the changes.
- Allows Program admins to establish participant's Program eligibility based on database reviews of participants qualifying through state/federal programs third-party Program admins.
- CA LifeLine will be able to use these databases to determine eligibility.
- Revises Specific Support Amounts (SSA) and Minimum Service Standards (MSS).
- Eliminates Upgrade Plan tier.
- Raises Basic Plan monthly data allotment to 4.5 GB.
- Reduces minimum allotment for Family Plans to 6 GB.
- Decisions to continue to make up SSA for *wireline* services that do not meet federal broadband MSS.
- Requires new plan offerings for *wireless* customers by December 2021
  - Broadband offering increase. Benefits the customer in terms of data usage, especially regarding data usage in the time of COVID.
  - Basic and standard plans in effect by December 1, 201 with no increase cost to customers; increase in plan offerings at no cost.
  - Upgraded family plans offer more data (minimum 12GB). These are optional plans for customers and come at added cost to customers.

September 2021 | California LifeLine Monthly Updates

- **2021-09-16** The TPA implemented "data cleansing" steps for CA LifeLine subscriber information before the data is submitted to the CalFresh system:

  (1) Removing all special characters from name fields

  (2) Removing spaces before and after hyphens and apostrophes (example: Smith- Terry or Terry – Smith)

  (3) Removing spaces between words (example: Hernandez Garcia).

  SPs were informed of their role in data hygiene efforts:

(1) Submit participants' names as their names appear on their government-issued identifications (2) Do not abbreviate participants' first names

(3) Perform quality checks for typographical errors and misspellings

(4) Avoid the use of special characters

(5) Do not use c/o (in care of) in the participants' name fields. Use the Billing Name fields for this purpose

(6) Use the Name Suffix field when a participant's name includes a suffix such as Jr, Sr, II, etc. rather than adding the name suffix in the Last Name field

(7) Use the monthly and on demand true up reports to identify data quality issues with active subscribers' names and proactively fix identified issues using the daily file process

- **2021-09-20** TPA rapid review que enhanced to automatically approve renewal forms submitted through California LifeLine public website, interactive voice response system, service provider intake API, and live assistance from TPA call center. Forms processed through enhanced rapid review automation do not need manual review.

- **2021-09-07** SPs were informed that the County of Los Angeles Department of Public Social Services Verification of Benefits form was no longer acceptable proof of SNAP/CalFresh participation due to identified fraudulent activities with this form (WFA).

October 2021 | SB 394 | *Modifies definition of "household" for eligibility purposes*

- Under existing law, the CPUC has regulatory authority over public utilities, including telephone corporations. Existing law requires that a lifeline telephone service customer be provided with one LifeLine subscription at the customer's principal place of residence, and provides that no other member of that customer's family or household, as defined, who maintains residence at that place is eligible for LifeLine telephone service.

- Approved **2021-10-09** this bill revises the definition of "household" for these purposes and would authorize multiple LifeLine telephone service customers to maintain the same address if they are not members of the same household.

October 2021 | California LifeLine Monthly Updates

- **2021-10-07** Limitation to 20,000 daily submissions for processing per SP implemented.

- **2020-10-08** Extracts from TPA database of images of application forms and supporting documentation For WFA investigation.

- **2021-10-14** Public website updates: (1) Updated the COVID FAQs to align to extension of the renewal process suspension through 2021-12-31, (2) fixed the missing "Is California LifeLine Right For You?" hyperlinks for Vietnamese and Tagalog languages (3) Corrected information in the FAQs that directed consumers to mail their applications and renewal forms to CAB rather than to the TPA.

- **2021-10-14** The CalFresh Confirm Beta Project was announced to the SPs.

- **2021-10-22** The CPUC hosted a Foster Youth Workshop to thoroughly discuss how to better serve this population.

- **2021-10-21** The CPUC announced that when the renewal process resumes (1) CalFresh Confirm Solution checks will occur for all California LifeLine subscribers on the day their renewal processes begin. Subscribers with a positive match will have renewal approval decisions queued for notification on their anniversary dates. (2) Subscribers for whom the CalFresh Confirm Solution checks do not produce positive matches will progress through the standard renewal process; however, additional CalFresh Confirm Solution checks will occur during the correctible, soft and hard denials stages

November 2021 | **ADMINISTRATIVE LETTER** | *Change to Specific Support Amount*

- **2021-11-01** CPUC Administrative letter distributed announcing the California LifeLine Program Specific Support Amount (SSA) that is effective January 1, 2022: $16.23

November 2021 | California LifeLine Monthly Updates

Preemptive Recertification via CalFresh Confirm

- CPUC and CDSS allow California LifeLine Program to utilize CalFresh confirm to verify active CalFresh participation.

- **2021-11-12.** Pre-emptive recertification added whereby active CalFresh participants using CalFresh Confirm are automatically recertified for California LifeLine Program. CalFresh Confirm checks added prior to TPA issuance of hard and soft denials.

Additional Website Digital Authentication Process

- Offers an alternative to mailed identity authentication forms

- **2021-20-11** *Wireline* customers sent automated pre-recorded voicemails.

- 2021-11-29 SMS text for *wireless* customers sent with links for documentation upload to confirm identity.

December 2021 | **RULEMAKING 20-02-008** | *Pandemic Renewal Suspension through 3/30/22*

- The Pandemic renewal suspension was extended from 2021-12-31 through 2022-03-30.

- **2021-12-30** The TPA moved anniversary dates for all subscribers to align to extension of the renewal process suspension through 2022-03-30

December 2021 | California LifeLine Monthly Updates

CalFresh Confirm

- **2021-12-13** Use of CalFresh Confirm for 100% of new enrollment applications. (1) A CalFresh Confirm check occurs for all applications regardless of the eligibility basis selected by the applicants (2) If CalFresh participation is confirmed, unless other issues are presented by the participant's application, the participant is approved based on CalFresh program participation, regardless of the program or income proof provided by the participant or the qualification boxes selected on the application (3) If CalFresh participation cannot be confirmed by the CalFresh Confirm check, and the participant provides TPA-approved documentation of CalFresh participation, the application is approved unless there are other issues with the participant's application that prevent approval (4) If CalFresh participation cannot be confirmed by the CalFresh Confirm check, and the participant submitted non-approved CalFresh or SNAP documentation, the TPA will issue a correctible denial (5) If CalFresh participation cannot be confirmed by the CalFresh Confirm check, and the participant provides non-CalFresh documentation, the application is reviewed based on current standard operating procedures

- **2021-12-13** The CPUC tightened the acceptable documentation used to prove active CalFresh participation because most active CalFresh participants should be matched by CalFresh Confirm. The acceptable documents are (1) images of the front and back sides of a Golden State Advantage card and a purchase or ATM balance inquiry receipt displaying the last 4 digits of the Golden State Advantage card (2) A Notice of CalFresh approval that displays the consumer's name and a certification period "from" date within the most recent 30 calendar days (3) A Notice of Action letter that displays the consumer's name and a Notice Date within the most recent 30 calendar days.

Other

- **2021-12-23** The CPUC published to its website updated documents depicting the new enrollment application and renewal process timelines.

- **2021-12-23** The TPA ran the entire LifeLine subscriber base through NCOA. Subscribers identified with forwarding addresses, undeliverable addresses and "moved, left no forwarding addresses" were segregated into SP-specific files. The files were distributed to SPs to support outreach efforts to obtain deliverable mailing addresses before the renewal process resumes.

January 2022 | California LifeLine Monthly Updates

- **2022 January through April** – The TPA is supporting service providers with fulfilling USAC's requests for documentation necessary for USAC to perform Payment Quality Audits (PQAs), including copies of the most recently approved certification or renewal forms, the most recent proof of Program eligibility and Independent Economic Household forms.

February 2022 | California LifeLine Monthly Updates

- **2022-02-03** Auditable documentation was approved for applications and renewals where eligibility is confirmed by CalFresh Confirm.

- **2022-02-11** Parolee Identification Cards issued by the California Department of Corrections and Rehabilitation, Division of Adult Parole Operations to the list of acceptable documents for the California LifeLine Program's Identification Check (ID Check). The public website was updated to add the Parolee Identification Card to the list of acceptable identification documents.

- **2022-02-11** California LifeLine Program's ID Check may require consumers to submit an ID Authentication Form with a color photograph of one or more acceptable identification documents to authenticate a consumer's identity. Black and white photocopies of identification documents will be accepted through USPS mail only, not electronically. The public website was updated with this information as well.

- **2022-02-25** Approval letters mailings to preemptively recertified subscribers started. The newly revised Qualified Renewal Initial letter template was used.

March 2022 | California LifeLine Monthly Updates

- **2022-03-10** The weekly files of active CA LifeLine subscribers submitted to USAC do not contain Service Address line 2, whereas this data point is included in the monthly USAC True Up reports. The weekly reports were updated effective 2022-03-10. Additionally, rather than adding Service Address line 2 as a separate column to the weekly reports, USAC asked that the Service Address line 2 data be joined to Service Address line 2 data and be delivered in a single column.

- **2022-03-14** Along with Service Provider Intake API (SPIA) for LifeLine applications, the TPA will introduced pre-processing validation that enforces the acceptance of alpha characters only for the First Name, Middle Initial and Last Name fields across all service provider submission methods: private website (web-based service providers), daily files, Direct Application Process (DAP) and SPIA.

Upcoming Updates

Enhanced Service Provider Intake Targeted for mid-March 2022

- Will allow service providers the ability to call a new API for real-time customer LifeLine program status

- Will align with CalFresh Confirm checks as well as any future external databases

- Will inform service providers if eligibility documentation needs to accompany application

- Will allow service providers to submit customer documentation

Enhanced Wireless Plan Search Functionality Targeted for April 2022

- Allows customers to comparison shop for *wireless* plan by price

- Planned for a 2022 April deployment: New SMS texts for *wireless* subscribers and pre-recorded outgoing messages (PROMs) for *wireline* subscribers who will not be sent renewal forms because the TPA obtained all necessary information from CalFresh Confirm to complete their renewals. Additionally, the outreach messaging will direct the recipients to a new public website page that provides FAQs related to renewals completed using CalFresh Confirm.

Standalone Independent Economic Household Process Targeted for early June 2022

- Objective is to include a process where the one LifeLine discount per household rule is enforced whenever a services changes addresses, not just during application and renewal processes

APPENDIX C. Qualifying Benefits Program

Programs Qualifying for LifeLine Eligibility

- Medicaid/Medi-Cal

- Low Income Home Energy Assistance Program (LIHEAP)

- Supplemental Security Income (SSI)

- Federal Public Housing Assistance or Section 8

- CalFresh, Food Stamps or Supplemental Nutrition Assistance Program (SNAP)

- Women, Infants and Children Program (WIC)

- National School Lunch Program (NSL)

- Temporary Assistance for Needy Families (TANF)

- California Work Opportunity and Responsibility to Kids (CalWORKs)

- Stanislaus County Work Opportunity and Responsibility to Kids (StanWORKs)

- Welfare-to-Work (WTW)

- Greater Avenues for Independence (GAIN)

- Tribal TANF

- Bureau of Indian Affairs General Assistance

- Head Start Income Eligible (Tribal Only)

- Food Distribution Program on Indian Reservations

- Federal Veterans and Survivors Pension Benefit Program

APPENDIX D. Review of Available Demographic Data Collected by Various California Social Benefit Programs

Review of available demographic data of social benefit programs. Note that the programs may be collecting more information than was available online.

Public Benefit Program	Demographic Data
Medicaid/Medi-Cal	Enrollment data updated by month. Sex, Age Group, Race/Ethnicity Enrollment by County, Status, Delivery system, Zip Code https://www.dhcs.ca.gov/dataandstats/Pages/Medi-Cal-Eligibility-Statistics.aspx
CalFresh, Food Stamps or Supplemental Nutrition Assistance Program (SNAP)	Participants by Race/Ethnicity and Age https://www.cdss.ca.gov/inforesources/research-and-data/calfresh-data-tables
Low Income Home Energy Assistance Program (LIHEAP)	Count of Applicant Households, Applicant Households by Poverty Level https://www.csd.ca.gov/Shared%20Documents/2019-LIHEAP-Household-Report.pdf
Temporary Assistance for Needy Families (TANF)	Age, gender, and race/ethnicity of adults and children in TANF and Separate State Program (SSP)-Maintenance-of-Effort (MOE) active families and closed cases https://www.acf.hhs.gov/ofa/data/characteristics-and-financial-circumstances-tanf-recipients-fiscal-year-2019 Household Type, Age, Race/Ethnicity, Employment Status, Marital status, Citizenship status, Disability benefits https://www.acf.hhs.gov/ofa/programs/tanf/data-report
Women, Infants and Children Program (WIC)	Redemptions Statewide and by County https://data.chhs.ca.gov/dataset/california-women-infants-and-children-program-redemption-by-county
Supplemental Security Income (SSI)	Recipients by age, sex, eligibility, marital status, country of origin, disability Tables for Children, Noncitizens, Under 65s, Recipients Who Work, and All Applications https://www.ssa.gov/policy/docs/statcomps/ssi_asr/
Tribal TANF	Caseload data for Families, Total Recipients, Adults, and Children (by region and tribe) https://www.acf.hhs.gov/ofa/data/Tribal-tanf-caseload-data-fiscal-year-2018
National School Lunch Program (NSL)	Enrollment by Race/ethnicity, school level, school locale https://nces.ed.gov/programs/digest/d20/tables/dt20_216.60.asp

APPENDIX E. Review of LifeLine Service Provider Websites and Marketing Materials

In July 2021, University researchers conducted an informal review of *wireless* and *wireline* Service Provider websites from the customer perspective to assess for LifeLine identification, promotion and program information, functionality, and accessibility as well as ease of enrollment. A summary of findings is provided below.

Identification, Promotion and LifeLine Program Information

Of the 11 *wireless* Service Providers' websites reviewed, all clearly identified themselves as LifeLine participants. In contrast, few of the 24 *wireline* Service Providers websites did so. Similarly, *wireless* Service Providers offered more LifeLine program information. *Wireless* Service Providers often utilized a clearly marked tab on the website explaining the enrollment process, eligibility requirements, re-certification, and frequently asked questions.

Larger *wireline* Service Providers (such as AT&T) tended to have more detailed program information readily available on their websites compared to smaller and more regional *wireline* Service Providers. These smaller providers typically referred customers to the California LifeLine website as a source of information.

Similar trends were observed for marketing the LifeLine program. Larger Service Providers (both *wireless* and *wireline*) with a presumably larger customer base and marketing budgets appeared to invest more in materials and outreach. Of the Service Providers that do market the program, some do not use the term "LifeLine" prominently in their materials, or at all outside of the fine print. Rather catch phrases such as "free phone" or "free cell phone to qualified individuals" are more commonly seen. References to the CPUC on Service Provider's marketing materials are scarce.

Wireless, more than *wireline* Service Providers, offered several options for customers to submit applications online, as well as to receive further communications from the Service Provider.

Functionality, Accessibility and Ease of Enrollment

To further assess for functionality, accessibility and ease of online enrollment, the University researchers completed all steps of enrollment short of actual program enrollment using a sample of six *wireless* LifeLine Service Providers with the largest customer bases: Assurance *Wireless*, TruConnect, SafeLink, SafetyNet Wireless, Access Wireless, and Standup Wireless.

These six *wireless* Service Providers had simple, straightforward enrollment applications, and offered easily accessible in-person, on-telephone, and mail-in applications for those who have trouble accessing the internet. The websites of these six *wireless* Service Providers predominantly followed a template, minimizing the questions asked and the steps required, with simple instructions. The websites were also the clearest in identifying themselves as participating in LifeLine (compared to the five smaller *wireless* Service Providers whose online enrollment processes were not tested) . All but SafeLink, explicitly advertised a free phone with enrollment.

The enrollment pages of these six *wireless* websites varied little in design and function (aside from company branding), and all enrollment applications were similar in ease of completion, taking fewer than 10 minutes to complete in most cases. All websites made it clear what was required for proof of eligibility. Only two *wireless* Service Providers offered multiple LifeLine eligible phone plans, which reduces decision-making required to complete the process.

Only a few offered translations into languages other than English before starting the applications, which may be difficult for non-English speakers. Finally, almost all *wireless* Service Providers had clear links and instructions to recertify for the program. Some Service Providers had links for re-certification but they were less accessible.

Wireline enrollment was not attempted as part of the assessment based on the following observations. The process to begin the application for *wireline* Service Providers was much less clear than the process for the *wireless* Service Providers. For example, more than half of the *wireline* Service Providers offered only phone contact information to begin the application process. Some *wireline* Service Providers do not offer online enrollment at all, and one in particular instructed customers to use a toll-collect number to inquire about applying. Because some *wireline* Service Providers serve small local areas, they do mention being able to make in-person appointments to begin the process. Overall, the online enrollment process for the LifeLine *wireline* program appears more difficult than the *wireless* process.

LANGUAGE ACCESSIBILITY

Regarding language accessibility, most of the 11 *wireless* Service Provider websites reviewed only offered website information in English. The top three (based on enrollment) *wireless* Service Providers, however, did have relatively obvious buttons for a Spanish enrollment application. Notably, once a customer starts the enrollment application, almost all *wireless* Service Providers offered the customer the chance to receive communications in several other languages, in large print, as well as in braille. However, these choices were often buried within the application requiring proficiency in English at least enough to begin the process. Nearly all 11 *wireless* Service Providers also offered alternatives for those who have trouble accessing the internet.

Amongst the *wireline* Service Providers, those who operate in areas with a greater proportion of Spanish-speakers offered Spanish versions of their websites (e.g., Wave Rural Connect and Blue Casa Premier). Large print and braille options were not readily apparent on *wireline* websites. Furthermore, many of the smaller *wireline* company websites were relatively rudimentary, and more difficult to navigate. For example, one smaller Service Provider only offered LifeLine information as a downloadable PDF, which could be difficult for customers to access.

Finally, researchers experienced occasional website glitches during the review. For those less experienced with technical troubleshooting, this could be an obstacle.

APPENDIX F. Summary of Recent Updates to LifeLine Program Administration

		Jul '21	Aug '21	Sep '21	Oct '21	Nov '21	Dec '21	Jan '22	Feb '22	Mar '22	Apr '22	May '22	Jun '22	Jun '22
#	**Projects**													
1	Pandemic Renewal Suspension through 9/30/2021	★												
2	Weekly Listing of Active CA LL Subscribers for USAC	★												
3	USAC Eligibility Determination Sampling - Document Extraction Automation		★											
4	Automation of the Rapid Review Task Queue			★										
5	Generate Error Code 40000 in a service provider's activity file when > 20K records submitted				★									
6	Ad hoc extraction of form images				★									
7	CalFresh Batch File Integration w/ CA LL renewal process for pre-emptive recert during renewal suspension					★								
8	Perform CalFresh Confirm checks at the soft and final hard denial steps					★								
9	CalFresh API Integration with CA LL application and renewal processes					★								
10	Automate OSP File Processing via SFTP					★								
11	Digital Authentication Process, including sending doc upload link by SMS text					★								
12	Tracking of CSR-assisted renewals for reporting					★								
13	Upgrade SPIA Phase 2 to create a real-time intake channel for applications									★				
14	Enhanced Public Website service provider search functionality										★			
15	Standalone Independent Economic Household (IEH) Process													★
16	Indicate Intake Channel on All Decision Letters													★
17	Implement Two-Factor Authentication to Repalce Pin													★
16	Upgrade SPIA Phase enhancing Real Time Updates & Disconnects													★

Key

Deployment	★
Target Deployment	★

APPENDIX G. Qualifying Identification Validation Documents

Documents Qualifying for LifeLine Validation

Documents that validate both address and identity:

- Unexpired Driver's License
- Unexpired State, U.S. Government, Military, or Tribal issued ID
- Current Registration Document from the California Department of Motor Vehicles
- Statement of Benefits from a qualifying government program

Documents that validate identity only:

- Medi-Cal card with the applicant's date of birth
- Unexpired Passport
- Social Security card
- Permanent Resident Card
- Certificate of Naturalization or Citizenship
- Unexpired Matricula Consular Card (customer must have a valid Social Security Number)

Documents that validate address only:

- Utility bill (dated within the last 365 days)
- Income document (Includes: W2, Prior year's State, Federal or Tribal tax return)
- Non-handwritten Mortgage or Lease Statement with signatures from both parties
- Mailed envelope with non-handwritten name/address (Note: Must be stamped "Postage Paid" or postmarked

Examples of acceptable documentation for proof of eligibility include:

- Identification card from a qualifying public assistance program (listed above)
- Notice of eligibility or decision letter of enrollment from a qualifying public assistance program
- Front page only of prior year's state (540, 540A, 540 2EZ, 540NR, or 540X), federal (1040, 1040A, 1040EZ, 1040NR, 1040NR-EZ, 1040SS, or 1040X), or Tribal tax return
- Income statements or paycheck stubs for three consecutive months within the past 12 months
- Statement of benefits from Social Security, Veterans Administration, retirement/pension, Unemployment Compensation, and/or Workmen's Compensation
- Alimony and/or child support documents
- Other official documents

APPENDIX H. Current LifeLine Application and Renewal Forms

Additional sample forms can be accessed online at:
https://www.californialifeline.com/en/sample_forms

California LifeLine Program

RENEWAL FORM

To continue receiving your discounts with
California LifeLine renew before...

RESPONSE DATE: 9/15/2019

0 0 0 0 0 0 0 0 0 0 2 9

000008
fname m lname
Addr1, Addr2
City, CA 00000

Keep this sheet for your records.

You can renew online at
www.californialifeline.com
using the PIN below

3333

There are two ways for you to renew your telephone discounts from this state program:

OR

For the quickest processing, renew
online at **www.californialifeline.com**
using your PIN.

Mail to:
California LifeLine Administrator
P.O. Box 138014,
Sacramento, CA 95813-8014
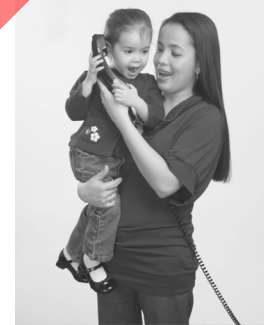
Continue your discounts...RENEW today!

Here's how:

Step 1 — Check that your personal information is correct.

Step 2 — Is your household already getting the California LifeLine discounts?

Step 3 — Are you a **Program-Based** participant?

Step 4 — Are you an **Income-Based** participant?

Step 5 — Complete the Household Worksheet.

Final Step — Submit your form online or by mail before the response date.

You do not need to provide any supporting documentation with your renewal form.

Step 1 — Check your name, address, phone number, date of birth, and the last four digits of your Social Security Number (SSN).

Call your phone company to report any mistakes **within 30 days**. The phone company will fix them. Corrections on this sheet will NOT be accepted.

Billing Address
fname lname
Addr1
Addr2
City, CA 00000

Permanent Service Address
fname lname
service_addr1 service_addr2
service_city, CA 11111

Applicant's Phone Number: 222-222-2222

Anniversary Date: 8/2/2020

PIN: 3333

Enrollment Code: 333-333-3333

carrier_name's Phone Number: 000-000-0000

California LifeLine Program
RENEWAL FORM

RESPONSE DATE: 9/15/2019

Step 2

By printing my initials here, I certify that **no one else** in my household is receiving California LifeLine discounts with my current phone company or another phone company (including federal Lifeline for cell phone service).

INITIAL HERE

Step 3

<u>PROGRAM-BASED</u>: **Are you or is anyone in your household, including kids, enrolled in any of the programs listed below?** If YES, fill in the bubble with a blue or black pen next to <u>all</u> of the programs in which you or any household member(s) are enrolled. Fill in bubble completely. Sample: ● Correct   ⨂ Incorrect

- ○ Women, Infants, and Children Program (WIC)
- ○ Medicaid/Medi-Cal
- ○ Supplemental Security Income (SSI)
- ○ National School Lunch Program (NSLP)
- ○ Low Income Home Energy Assistance Program (LIHEAP)
- ○ CalFresh, Food Stamps, or Supplemental Nutrition Assistance Program (SNAP)
- ○ Federal Public Housing Assistance or Section 8
- ○ Federal Veterans and Survivors Pension Benefit Program

- ○ Tribal TANF
- ○ Head Start Income Eligible (Tribal Only)
- ○ Bureau of Indian Affairs General Assistance
- ○ Food Distribution Program on Indian Reservations (FDPIR)
- ○ Temporary Assistance for Needy Families (TANF), California Work Opportunity and Responsibility to Kids (CalWORKs), Stanislaus Work Opportunity and Responsibility to Kids (StanWORKs), Welfare-to-Work (WTW), or Greater Avenues for Independence (GAIN)

🛑 **STOP**   **If you filled in any bubble on Step 3, <u>skip</u> Step 4.**

Step 4

<u>INCOME-BASED</u>: **Is your household's total annual gross income at or less than the annual income limits?** Check the *Income Table* in the Eligibility Guidelines.

How many people (adults and kids) are in your household?

Adults (18 and over) ⬚ **+** Kids (under 18) ⬚ **=** ⬚

What is your household's total annual gross income? (Round to whole dollars.)
Check the *Income Calculator* in the Eligibility Guidelines. **$** ⬚ , ⬚ . **0 0**

SAMPLE

000000000029

▌▌Turn Over ➡

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Did You Remember To:

- Call your phone company **within 30 days** to report any mistakes you see in Step 1.
- Print your initials in Step 2.
- Use blue or black pen to fill out your form.
- Print and SIGN your name below.

For faster processing, renew online at www.californialifeline.com using your PIN.

Optional

○ **REMOVE ME** - Fill in the bubble if you believe you **Do Not Qualify** for California LifeLine and/or want to **STOP** getting the discounts.

SIGN AND PRINT YOUR NAME - By signing below in compliance with federal and state government rules, I certify, under penalty of perjury, that giving false or fraudulent information is punishable by law, that my household is qualified for the discounts, that my household will not be getting more than one discount, that the service address is my principal residence, that I am not claimed as a dependent on another person's tax return, that I understand the notification rules, that I must renew my discounts annually, that if I do not renew I will lose the discounts, and that the information in this form is true and correct. I agree to inform my phone company or the California LifeLine Administrator within 30 days if I change my service address or billing address, if I no longer qualify for the California LifeLine discounts, or if my household is getting more than one discount. I understand and agree that I will be penalized if I do not follow these notification rules. I acknowledge and give my consent for the California LifeLine Administrator to share my information in this form to the Universal Service Administrative Company and/or its agents. Legal Guardians or people with Power of Attorney are allowed to sign this form. For California LifeLine wireless participants: I consent to receive future SMS (text) messages from the California LifeLine Program. I understand that I can opt-out of receiving these text messages at any time because they are not needed to receive the California LifeLine discounts.

X _____
Participant's Signature (REQUIRED)

○ Fill in this bubble if signed by a Legal Guardian or a person with Power of Attorney.

Today's Date: ⬚⬚ / ⬚⬚ / ⬚⬚⬚⬚
Month   Day   Year

Participant's Date of Birth:(REQUIRED) ⬚⬚ / ⬚⬚ / ⬚⬚⬚⬚
Month   Day   Year

The LAST 4 digits of the Participant's Social Security Number (REQUIRED): ⬚⬚⬚⬚
Last 4 digits

Participant's First and Last Name (REQUIRED: Must match the name from Step 1 under Permanent Service Address)

(Optional) Fill in the bubble next to your choice for future notifications.   ○ Standard Print   ○ Large Print   ○ Braille

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APPENDIX I. CPUC Telephone Service Provider Online Survey

CPUC Telephone Service Provider Survey

Sacramento State University | Version FINAL (Updated: 5/27/21)

The following survey asks about your views on providing phone services for eligible low-income households provided by carriers like yours. The survey is being administered by Sacramento State University on behalf of the California Public Utilities Commission (CPUC).

Esta encuesta también se puede tomar en español. Puede elegir español del menú en la esquina derecha.

The survey should take only about 5 - 10 minutes.

Your participation is entirely voluntary. You may decline to answer any or all questions, and you can withdraw at any time.

All survey information is strictly confidential. Survey results are only reported together so no individual response can be identified. You are never identified as a survey participant.

Your choosing the "I agree" button below indicates that you have read and understand the information provided above and that you agree to participate.
- ❍ I agree to participate in the survey.
- ❍ I do not agree to participate in the survey.

Survey Instructions:
1. Scroll to the bottom of each screen to see all questions.
2. Click the 'next' button at the bottom of the page in the right-hand corner, to move to next screen
3. When using a smart phone, flip it sideways to see all questions clearly.

1. What is the name of the phone carrier that you work for?

_____

2. Is your company primarily a *wireless* provider or landline/*wireline* provider?
   - ❍ *Wireless*
   - ❍ Landline/*wireline*
   - ❍ Both

3. Which of the following best describes your primary role at the company?
   - ❍ Sales
   - ❍ Customer service
   - ❍ Management
   - ❍ Marketing or Public Relations
   - ❍ Program enrollment
   - ❍ Administrative support
   - ❍ Legal
   - ❍ Executive level, VP or Policy maker
   - ❍ Something else (Please specify): _____

4. Have you ever heard of the **California LifeLine Program?**
   - ❍ Yes
   - ❍ No
   - ❍ Don't know/not sure

5. Are you aware of the public program that helps low-income households pay for phone service?
   - ❍ Yes
   - ❍ No
   - ❍ Don't know/not sure

6. To the best of your knowledge, does your company participate in the **California LifeLine** program or the State offered public program?
   - ❍ Yes
   - ❍ No
   - ❍ Don't know/not sure

7. About how long has your company been participating in **LifeLine** or the State offered public program?
   - ❍ Less than one year
   - ❍ Between 1 and 2 years
   - ❍ Between 2 and 3 years
   - ❍ Between 3 and 4 years
   - ❍ 4 years or longer
   - ❍ Don't know/not sure

8. What percentage of your time is spent working with **eligible low-income** customers or helping customers enroll in **LifeLine** or the State offered program?
   ❍ I don't spend any time working with LifeLine-eligible customers.
   ❍ 25% or less
   ❍ 26%-50%
   ❍ 51%-75%
   ❍ 76%-100%

9. What is the reason your company does not participate in **LifeLine** or the State offered public program? (Select all that apply)
   ❍ Too complicated
   ❍ Not worth the time it takes to enroll
   ❍ Subsidy is not enough
   ❍ Not popular with customers
   ❍ Some other reason (please specify): _____
   ❍ Don't know

10. Does your company offer other subsidized or reduced rate phone programs or services that are **not** associated with **LifeLine** or the State offered program?
    ❍ Yes
    ❍ No
    ❍ Don't know/not sure

11. Do you market these other **non-LifeLine** services targeting low-income households under a special promotional name?
    ❍ Yes (What promotional name does it go by?) _____
    ❍ No
    ❍ Don't know/not sure

12. If your company participates in **LifeLine** or the State offered public program, does it market or do outreach to eligible low-income households to increase enrollment?
    ❍ Yes
    ❍ No
    ❍ Don't know/not sure

13. What sort of marketing, outreach or promotion does your company do to increase enrollment for eligible low-income households? (Select all that apply)
    ❍ Mail
    ❍ Text
    ❍ In-person outreach/Street teams
    ❍ In-store marketing or promotions
    ❍ Online marketing through your website or some other channel
    ❍ Something else (Please specify) _____
    ❍ Don't know/not sure

14. If your company participates in **LifeLine** or the State offered program, have you ever directly assisted someone through the **LifeLine** enrollment process?
    - ○ Yes
    - ○ No
    - ○ Don't know/not sure

15. Please rate each of the following areas in the enrollment process on a 1 to 5 scale where a "1" means "Very difficult" and a "5" means "Very easy".

(Select a response for each row)

	1 - Very difficult	2 - Somewhat difficult	3 - Neither easy nor difficult	4 - Somewhat easy	5 - Very easy	Don't know/ not sure
The overall enrollment process	○	○	○	○	○	○
Customer's understanding of requirements to enroll	○	○	○	○	○	○
Ability to complete enrollment in single encounter	○	○	○	○	○	○
Time needed to complete enrollment	○	○	○	○	○	○
Documentation requirements	○	○	○	○	○	○
Something else (please specify)	○	○	○	○	○	○

16. In general, how would you rate customers' overall satisfaction with the plans offered by **LifeLine?** Please answer on a 1 to 5 scale where a "1" means "Completely dissatisfied" and a "5" means "Completely satisfied".
    - ○ 1 - Completely dissatisfied
    - ○ 2 - Somewhat dissatisfied
    - ○ 3 - Neither satisfied nor dissatisfied
    - ○ 4 - Somewhat satisfied
    - ○ 5 - Completely satisfied
    - ○ Don't know

17. How important do you think each of the following services are to eligible low-income customers who enroll in phone services? Please rate each on a 1 to 5 scale where a "1" means "Not at all important" and a "5" means "Extremely important". (Select a response for each row)

	1 - Not at all important	2 - Not that important	3 - Somewhat important	4 - Very important	5 - Extremely important	Don't know
Cost of plan	❍	❍	❍	❍	❍	❍
Ease of enrollment	❍	❍	❍	❍	❍	❍
Ease of re-enrollment	❍	❍	❍	❍	❍	❍
Anonymity of enrollment in a subsidized/benefit program	❍	❍	❍	❍	❍	❍
Type of device included in the plan	❍	❍	❍	❍	❍	❍
Quality of the device included in the plan	❍	❍	❍	❍	❍	❍
Amount of data included in plan	❍	❍	❍	❍	❍	❍
Speed of broadband included in plan	❍	❍	❍	❍	❍	❍
The availability of family plans	❍	❍	❍	❍	❍	❍
Other (please specify):	❍	❍	❍	❍	❍	❍
Other (please specify):	❍	❍	❍	❍	❍	❍

18. What suggestions do you have for how the **LifeLine** program could be improved or made more efficient for providers?

_____

_____

_____

_____

_____

_____

_____

19. What suggestions do you have for how the **LifeLine** program could be improved to provide better overall service for eligible low-income customers?

_____

_____

_____

_____

_____

_____

_____

20. Is there anything else you'd like to share with us in terms of participating in the **LifeLine** Program or providing phone services to eligible low-income customers?

_____

_____

_____

_____

_____

_____

_____

CPUC Statewide Survey, August 2021

Institute for Social Research | Sacramento State University
English Survey | Final Version

California LifeLine Survey
Take our Survey and Earn a Chance to Win $100!

The following survey asks you about your experience with the California LifeLine program. Whether you are currently enrolled in LifeLine or not, your input will provide valuable information to help make the LifeLine phone discount program better for you. The results of this survey will be used by the California Public Utilities Commission to better understand the needs of those who use discounted phone services throughout the state. This survey is being administered by the Institute for Social Research at Sacramento State University.

Esta encuesta también se puede tomar en español. Puede elegir español del menú en la esquina derecha.

- Today's survey should take you **no longer than 10 minutes**.
- You will be **entered into a drawing to win one of five $100 gift cards** as a 'thank you' for answering today's survey. Winners of the random drawing will be notified on or before October 15th, 2021. We will collect your phone number at the end of the survey if you wish to be entered in the drawing.
- Your participation in this survey is **entirely voluntary**. You may decline to answer any or all questions in today's survey. You also have the right to withdraw at any time.
- All survey information is **strictly confidential**. Survey results are only reported together so no individual response can be identified. You are never identified as a survey participant.
- **Your choosing the "I agree" button below indicates** that you have read and understood the information provided above and that **you agree to participate**.

If you have any questions about the survey, please call (916) 278-2312 or email cpucsurvey@csus.edu. If you have any questions about your rights as a participant in a research project, please call the Office of Research, Innovation, and Economic Development, CSU Sacramento (916) 278-5674 or email irb@csus.edu.

- ❍ **I agree to participate in the survey**.
- ❍ **I decline to participate in the survey**.

Survey Instructions:

1. Scroll to the bottom of each screen to see all questions.
2. Click the 'next' button at the bottom of the page in the right-hand corner, to move to next screen.
3. When using a smart phone, flip it sideways to see all questions clearly.

Q1. Before we begin, can you please tell us your **birth year?**

▼ Drop down menu options: After 2003 thru 1922

→ Disqualify if under 18.

(Age disqualify screen)
Q1a. **We're sorry, but you must be at least 18 years of age to participate in this survey.** Thank you and have a great day!

Q2. What **zip code** do you currently reside in most of the time?

(Enter 5-digit zip code response)

(Ask all)
Q3. Are you **currently enrolled**, or have you **been previously enrolled** in the **LifeLine phone discount program?**

❍ **Currently enrolled** in LifeLine

❍ Not currently enrolled, but **previously enrolled** in LifeLine

❍ **Never enrolled** in LifeLine

(Ask if currently enrolled in LifeLine)
Q4. As a currently enrolled participant in the LifeLine program, **what phone service are you getting a discount for?**

❍ **Wireless/cell phone** for myself or someone in my household

❍ **Landline phone** for the home

❍ TTY (with wireless/cellphone)

❍ TTY (with landline phone)

❍ None of the above

(Ask if previously enrolled in LifeLine)
Q5. As a previously enrolled participant in the LifeLine program, **what phone service did you get a discount for?**

- ❍ **Wireless/cell phone** for myself or someone in my household

- ❍ **Landline phone** for the home

- ❍ TTY (with wireless/cellphone)

- ❍ TTY (with landline phone)

- ❍ None of the above

(Ask if never enrolled in LifeLine)
Q6. Even though you have never been enrolled, have you ever **applied** to the California LifeLine Program?

- ❍ Yes

- ❍ No

- ❍ Don't know

The next set of questions are about the cell phone device you use with your LifeLine discounted services.

Q7. **What type of cell phone** do you currently use with the LifeLine discount program?

❍ Google Pixel

❍ iPhone

❍ Motorola

❍ Nokia

❍ OnePlus

❍ Razer Phone

❍ Samsung Galaxy

❍ Xiaomi Redmi

❍ Some other type of phone (Please specify) _____

Q8. Was this **cell phone free when you enrolled** in the LifeLine program?

❍ Yes

❍ No

❍ I don't remember

Q9. How would you rate your overall satisfaction with the **cell phone that was provided when enrolling** in LifeLine?

❍ Not at all satisfied

❍ Not very satisfied

❍ Neither satisfied nor dissatisfied

❍ Somewhat satisfied

❍ Very satisfied

❍ Not applicable/did not receive a cell phone when I enrolled

Q10. How often is this **LifeLine cell phone used?**

❍ Every day

❍ A few days per week

❍ About one day per week

❍ A few days per month

❍ Less than one day per month

❍ Never

❍ Don't know/it's not my phone

(Ask if use LL phone a few days per week or less often)
Q11. Why don't you use your LifeLine cell phone **more often?**

(select all that apply)

❑ Don't have a need

❑ The phone doesn't work

❑ Nobody knows the phone number

❑ I just use it as a backup or for emergencies

❑ I don't get good service or reception on the phone

❑ My texts, minutes or data plan is limited

❑ I have another cell phone that I prefer to use

❑ It's not my phone

❑ Some other reason (Specify) _____

❑ Don't know

Q12. What are the **most important functions/purposes** of the cell phone enrolled in LifeLine?

(select all that apply)

❑ Primary personal phone line/contact (phone, text)

❑ Primary business/work phone line/contact phone

❑ To access the internet (with data)

❑ Use as a back-up/emergency phone

❑ Other (Specify) _____

❑ Don't know/the LifeLine phone is used by someone else

Q13. Our next questions are about the cell phone service/company that provides your LifeLine discounted service. Who is the **cell phone service provider** for your LifeLine cell phone?

❍ Access Wireless (iWireless)

❍ American Broadband and Telecommunications

❍ Assurance Wireless by Virgin Mobile

❍ enTouch Wireless (Boomerang Wireless)

❍ Excess Telecom

❍ Feel Safe Wireless (AirVoice Wireless)

❍ Life Wireless (Telrite)

❍ RedPocket Mobile

❍ SafetyNet Wireless (Amerimex)

❍ SafeLink (TracFone)

❍ Standup Wireless (Global Connection)

❍ Tag Mobile

❍ TruConnect (TelScape Communications)

❍ Some other provider (Specify) _____

❍ Don't know the name of my current LifeLine cell provider

Q14. Which of the following are **included as part of your LifeLine cell phone service plan?**

(select all that apply)

❑ Unlimited talk/unlimited minutes

❑ Unlimited texts

❑ Unlimited data/broadband

❑ Free international calls

❑ Nationwide coverage

❑ 4G or 5G data

❑ Something else (Specify) _____

❑ Don't know

❑ None of these

Q15. About **how long have you been with** your current LifeLine cell phone service provider?

- ❍ I just enrolled
- ❍ Less than 6 months
- ❍ 6 months to 1 year
- ❍ 1 to 2 years
- ❍ 2 to 3 years
- ❍ 3 years or longer
- ❍ Don't know/can't remember

Q16. **How long have you had your current cell phone number** (the one enrolled in Lifeline)?

- ❍ I had this number before enrolling in LifeLine.
- ❍ This number was new to me when I enrolled in LifeLine.
- ❍ Not applicable - I didn't have a number before enrolling in LifeLine.
- ❍ Don't know/don't remember.

Q17. Which of the following best describes **why you chose your current LifeLine cell phone service provider?**

(select all that apply)

- ❑ I'm familiar with their service or have been using it for a long time
- ❑ Someone I know uses them or recommended them
- ❑ They offer the cheapest rates
- ❑ I like the ads I've seen for them
- ❑ It's the only provider in my area or the only one I've heard about
- ❑ I got a free phone when I signed up
- ❑ It's a family plan
- ❑ I get unlimited talk, text and/or data
- ❑ It was easy to sign up
- ❑ They have the best overall service
- ❑ Some other reason (Specify) _____
- ❑ Don't know

Q18. Please rate your current **LifeLine cell phone provider** on each of the following services.

(please select a response for each item)

Q18a. **Customer service**

❍ Excellent

❍ Very good

❍ Good

❍ Fair

❍ Poor

❍ Don't know

❍ Not applicable

Q18b. **Type of phone included in plan**

❍ Excellent

❍ Very good

❍ Good

❍ Fair

❍ Poor

❍ Don't know

❍ Not applicable

Q18c. **Quality of the phone included in the plan**

❍ Excellent

❍ Very good

❍ Good

❍ Fair

❍ Poor

❍ Don't know

❍ Not applicable

Q18d. **Amount of minutes included in the plan**

- ❍ Excellent
- ❍ Very good
- ❍ Good
- ❍ Fair
- ❍ Poor
- ❍ Don't know
- ❍ Not applicable

Q18e. **Amount of data included in the plan**

- ❍ Excellent
- ❍ Very good
- ❍ Good
- ❍ Fair
- ❍ Poor
- ❍ Don't know
- ❍ Not applicable

Q18f. **Speed of broadband included in the plan**

- ❍ Excellent
- ❍ Very good
- ❍ Good
- ❍ Fair
- ❍ Poor
- ❍ Don't know
- ❍ Not applicable

Q18g. **The availability of family plans**

- ❍ Excellent
- ❍ Very good
- ❍ Good
- ❍ Fair
- ❍ Poor
- ❍ Don't know
- ❍ Not applicable

Q18h. **Overall service coverage area**

❍ Excellent

❍ Very good

❍ Good

❍ Fair

❍ Poor

❍ Don't know

❍ Not applicable

Q18i. **Overall value/savings**

❍ Excellent

❍ Very good

❍ Good

❍ Fair

❍ Poor

❍ Don't know

❍ Not applicable

Q19. How would you rate your **overall satisfaction** with your **current LifeLine cell phone service provider?**

❍ Not at all satisfied

❍ Not very satisfied

❍ Neither satisfied nor dissatisfied

❍ Somewhat satisfied

❍ Very satisfied

Q20. Please select the **TOP THREE improvements** to your LifeLine cell phone service that you would like to see. (choose up to three)

❑ Better phone included with the plan

❑ Better savings

❑ Make the enrollment and/or re-enrollment process easier or less confusing

❑ Better customer service

❑ Better coverage

❑ Better service plan options

❑ Something else (please specify) _____

CURRENT LIFELINE WIRELINE USERS

Our next questions are about your LifeLine home phone/landline.

Q21. What company is the **phone service provider** for your **LifeLine home phone/landline?**
(open-end response)

Q22. Which of the following are **included in the service plan** for your **LifeLine home phone/
landline?**

(select all that apply)

- ❑ Long distance service
- ❑ Free international calls
- ❑ Caller waiting/caller ID
- ❑ Call forwarding
- ❑ Voicemail
- ❑ Something else (Specify) _____
- ❑ Don't know
- ❑ None of these

Q23. About **how long** have you been with **your current LifeLine home phone/landline provider?**

- ❍ I just enrolled
- ❍ Less than 6 months
- ❍ 6 months to 1 year
- ❍ 1 to 2 years
- ❍ 2 to 5 years
- ❍ 5 to 10 years
- ❍ 10 years or longer
- ❍ Don't know/can't recall

Q24. How long have you had the **phone number** associated with your **LifeLine home phone/landline?**

- ○ I had the number before I enrolled in the LifeLine Program.
- ○ The number was new to me when I enrolled in the LifeLine Program.
- ○ Not applicable - I didn't have a phone number before enrolling.
- ○ Don't know/Don't remember

Q25. Which of the following best describes **why you chose your current LifeLine home phone/landline provider?**

(select all that apply)

- ❑ I'm familiar with their service or have been using it for a long time
- ❑ Someone I know uses them or recommended them
- ❑ They offer the cheapest rates
- ❑ I like the ads I've seen for them
- ❑ It's the only provider in my area or the only one I've heard about
- ❑ It's a family plan
- ❑ It was easy to sign up
- ❑ They have the best overall service
- ❑ Some other reason (Specify) _____
- ❑ Don't know

Q26. About **how often do you use** your LifeLine home phone/landline?

- ○ Every day
- ○ A few times per week
- ○ Once per week
- ○ A few times per month
- ○ About once per month
- ○ Once or twice every 3 months
- ○ About once every 6 months or less often
- ○ Never

Q27. **Why don't you use** your LifeLine home phone/landline **more often?**

- ❑ Don't have a need
- ❑ Nobody knows the phone number
- ❑ I just use it as a backup or for emergencies
- ❑ Some other reason (Specify) _____
- ❑ Don't know

Q28. What are the most **important functions/purposes** that your LifeLine home phone/landline is used for?

- ❑ Primary household phone line/contact
- ❑ Primary business/work phone line/contact
- ❑ Use as a back-up/emergency phone
- ❑ It's my main phone/do not have another phone
- ❑ Other (Specify) _____
- ❑ Don't know

Q29. Please rate your **LifeLine landline/home phone provider** on each of the following services.

(please select a response for each item)

Q29a. **Customer service**

- ❍ Excellent
- ❍ Very good
- ❍ Good
- ❍ Fair
- ❍ Poor
- ❍ Don't know
- ❍ Not applicable

Q29b. **The availability of family plans**

    ❍ Excellent

    ❍ Very good

    ❍ Good

    ❍ Fair

    ❍ Poor

    ❍ Don't know

    ❍ Not applicable

Q29c. **Overall value/savings**

    ❍ Excellent

    ❍ Very good

    ❍ Good

    ❍ Fair

    ❍ Poor

    ❍ Don't know

    ❍ Not applicable

Q29d. **Overall quality of service**

    ❍ Excellent

    ❍ Very good

    ❍ Good

    ❍ Fair

    ❍ Poor

    ❍ Don't know

    ❍ Not applicable

Q30. Please select the **TOP THREE improvements** to your LifeLine phone service that you would like to see.

(choose up to three)

- ❑ Better phone line quality
- ❑ Better savings
- ❑ Make the enrollment and/or re-enrollment process easier or less confusing
- ❑ Better customer service
- ❑ Better phone features available
- ❑ Better service plan options
- ❑ Something else (please specify) _____

Our next questions are about your previous enrollment in the LifeLine discount program.

Q31. Which of the following best describes **why you are no longer** enrolled in LifeLine?

(select all that apply)

- ❑ My enrollment lapsed, and I just never got around to renewing it
- ❑ LifeLine or my phone service provider discontinued my service or unenrolled me from the program
- ❑ I tried to renew with LifeLine, but my application was denied
- ❑ I no longer qualified for the LifeLine program
- ❑ The re-enrollment or renewal process was too complicated
- ❑ I found another low cost or discounted phone service that better suits my needs
- ❑ The LifeLine service plan options were too limited
- ❑ I did not like the cell phone LifeLine provided when I signed up
- ❑ I was dissatisfied with LifeLine overall
- ❑ I got a better/less expensive rate through another phone service provider
- ❑ Some other reason (Specify) _____
- ❑ Don't know

Q32. When did your enrollment in LifeLine **end?**

- ❍ Within the past month
- ❍ Within the past 3 months
- ❍ Within the past 6 months
- ❍ Between 6 months and 1 year ago
- ❍ Longer than one year ago
- ❍ Don't know/can't recall

Q33. How long were you **previously enrolled LifeLine?**

Please answer thinking about the **total amount of time you were enrolled with LifeLine across different phone providers.**

- ❍ Less than 6 months
- ❍ 6 months to 1 year
- ❍ 1 to 2 years
- ❍ 2 to 3 years
- ❍ 3 years or longer
- ❍ Don't know/can't recall

(Ask if previous LifeLine wireless user)
Q34. Who was your **cell phone provider** when you were **previously enrolled in LifeLine?**

- ❍ Access Wireless (iWireless)
- ❍ American Broadband and Telecommunications
- ❍ Assurance Wireless by Virgin Mobile
- ❍ enTouch Wireless (Boomerang Wireless)
- ❍ Excess Telecom
- ❍ Feel Safe Wireless (AirVoice Wireless)
- ❍ Life Wireless (Telrite)
- ❍ RedPocket Mobile
- ❍ SafetyNet Wireless (Amerimex)
- ❍ SafeLink (TracFone)
- ❍ Standup Wireless (Global Connection)
- ❍ Tag Mobile
- ❍ TruConnect (TelScape Communications)
- ❍ Some other provider (Specify) _____
- ❍ Don't know/can't recall

(Ask if previous LifeLine wireless user)
Q35. What were the most **important functions/purposes** that you used your LifeLine cell phone for?

(select all that apply)

- ❑ Primary personal phone line/contact (phone, text)
- ❑ Primary business/work phone line/contact (phone, text)
- ❑ To access the internet (with data)
- ❑ Use as a back-up/emergency phone
- ❑ Other (Specify) _____
- ❑ Don't know/the LifeLine phone was used by someone else

(Ask if previous LifeLine wireline phone user)
Q36. Who was your **landline/home phone provider** when you were **previously enrolled in LifeLine?**
(open end response)

(Ask if previous LifeLine wireline phone user)
Q37. What were the most **important functions/purposes** that you used your LifeLine home phone/landline for?

(select all that apply)

❑ Primary household phone line/contact

❑ Primary business/work phone line/contact

❑ Use as a back-up/emergency phone

❑ It's my main phone/do not have another phone

❑ Other (Specify) _____

❑ Don't know

Q38. How often did you **use your phone previously enrolled in LifeLine?**

❍ Every day

❍ A few days per week

❍ About one day per week

❍ A few days per month

❍ Less than one day per month

❍ Never

❍   Don't know/I never used it/it wasn't my phone

(Ask if used LifeLine phone a few days per month or less often)
Q39. Why didn't you use your LifeLine phone **more often?**

(select all that apply)

- ❑ Did not have a need
- ❑ The phone didn't work
- ❑ Nobody knew the phone number
- ❑ I just used it as a backup
- ❑ I didn't get good service or reception on the phone
- ❑ My texts, minutes and/or data plan were too limited
- ❑ It's not my phone
- ❑ Some other reason (Specify) _____
- ❑ Don't know

Q40. Overall, **how satisfied were you** with your LifeLine provider when you were previously enrolled?

- ❍ Not at all satisfied
- ❍ Not very satisfied
- ❍ Neither satisfied nor dissatisfied
- ❍ Somewhat satisfied
- ❍ Very satisfied

Q41. How likely are you to **enroll or re-enroll** in LifeLine in the future?

- ❍ Not at all likely
- ❍ Not very likely
- ❍ Somewhat likely
- ❍ Very likely
- ❍ Undecided

Q42. Why exactly are you **{INSERT ANSWER FROM PREVIOUS}** to enroll or re-enroll in LifeLine in the future?
(open end response)

Q43. Overall, **how familiar are you** with the LifeLine discount phone program?

❍ Not at all familiar

❍ Not very familiar

❍ Somewhat familiar

❍ Very familiar

Q44. How did you **first see or hear** about the LifeLine discount phone program?

❍ Internet search

❍ Through online advertising

❍ Print advertising

❍ Through social media

❍ From friends or family

❍ From my phone service provider

❍ From a customer service representative in the community/from a street team member

❍ Social service provider/benefits worker

❍ Someplace else (Specify) _____

❍ Don't know/can't recall

Q45. Why have you **never enrolled** in the LifeLine discount phone program?

(select all that apply)

- ❑ Not familiar with it/don't know enough about it
- ❑ The broadband is too slow
- ❑ I don't like any of the LifeLine phone providers
- ❑ The overall value/savings is not that good
- ❑ I'd prefer to stay with my current phone service provider
- ❑ I prefer to use a different discount phone service provider
- ❑ LifeLine doesn't offer family plans
- ❑ I don't want to give out personal or financial information in order to enroll
- ❑ I don't trust LifeLine
- ❑ I can't keep my phone number
- ❑ You can only have one LifeLine phone per household
- ❑ My application was denied
- ❑ Some other reason (please specify) _____
- ❑ Don't know

Q46. Even though you have never enrolled in the LifeLine discount program, **have you ever contacted LifeLine customer support** through any of the following methods?

(Select all that apply)

- ❑ Yes, online support (web form or chat)
- ❑ Yes, telephone support/1-800 number
- ❑ No, I have not contacted LifeLine customer support

Q47. How would you rate your overall LifeLine **customer support experience?**

- ○ Excellent
- ○ Very good
- ○ Good
- ○ Fair
- ○ Poor

Q48. Do you or does anyone in your household currently have **a need for low cost or discounted phone services?**

○ Yes

○ No

○ Don't know

Q49. For **what type of phone service** do you need low cost/reduced rate phone services?

(check all that apply)

❑ Wireless/cell phone for myself

❑ Wireless/cell phone for someone else in my household

❑ Landline phone for the home

❑ TTY phone

❑ Other phone (Specify) _____

Q50. Are you currently receiving **low cost or discount phone services** through another phone provider not associated with LifeLine?

(select all that apply)

❑ Yes, for my personal cell phone

❑ Yes, for another household member's cell phone

❑ Yes, for my landline phone

❑ Yes, for some other phone in my household

❑ No

❑ Don't know

Q51. Who is your current **low cost/discount phone provider?**
(open-end response)

Q53. How long have you been with this **low cost/discount phone provider?**

- ❍ Less than 6 months
- ❍ 6 months to 1 year
- ❍ 1 to 2 years
- ❍ 2 to 3 years
- ❍ 3 years or longer
- ❍ Don't know/can't remember

Q54. Overall, **how satisfied are you** with your low cost/discount phone provider?

- ❍ Not at all satisfied
- ❍ Not very satisfied
- ❍ Neither satisfied nor dissatisfied
- ❍ Somewhat satisfied
- ❍ Very satisfied

Q55. Which of the following would you consider **"Must haves"** for you to consider enrolling in a discount phone program like LifeLine?

(You may select **up to three** from the choices listed)

- ❑ Free phone included with the plan
- ❑ No registration fees when signing up
- ❑ Unlimited talk/text
- ❑ Unlimited broadband/data
- ❑ Fast broadband speeds
- ❑ Great cell phone coverage
- ❑ Free international calls
- ❑ Can sign up as many phones as I want in the program
- ❑ Outstanding customer service
- ❑ No "hidden" fees included in the service
- ❑ Must offer family plans
- ❑ Caller forwarding/caller ID
- ❑ Voicemail
- ❑ Something else (specify) _____

Q56. How likely are you to **enroll in the LifeLine discount program in the future?**

- ❍ Not at all likely
- ❍ Not very likely
- ❍ Somewhat likely
- ❍ Very likely
- ❍ Don't know

DEMOGRAPHICS (Ask All)

Our last questions are for classification purposes only and will help us properly analyze the results. As a reminder, we do not report individual responses, only groups of people. You will never be identified as a survey participant.

Q57. Are you...?

❍ Male

❍ Female

❍ Genderqueer/gender non-binary

❍ Other (Specify) _____

Q58. How long have you lived at your **current residence?**

❍ Less than a year

❍ 1-2 years

❍ 3-5 years

❍ 6-10 years

❍ More than 10 years

❍ I do not currently have a permanent place to live

Q59. In the last 10, years how many times have you **moved or changed residences?**

❍ None. I have not moved in the last 10 years

❍ Once

❍ Twice

❍ Three times

❍ Four times

❍ Five or more times

Q60. Do you have a regular place where you **receive your mail** aside from where you currently live?

❍ Yes

❍ No

Q61. Do you **regularly use email?**

❍ Yes

❍ No

Q62. What type of **paid Internet service,** if any, do you currently have in your household?

- ❍ DSL (digital subscriber line)
- ❍ Broadband (Cable, Wireless/Wi-Fi, Satellite, etc.)
- ❍ Other paid internet (Specify) _____
- ❍ I pay for internet in my home, but I'm not sure what type
- ❍ None/No paid internet service for home

Q63. Do you obtain your paid internet service through the **same provider as your LifeLine provider?**

- ❍ Yes
- ❍ No
- ❍ Don't know

Q64. How many **people currently live in your household** at least part of the time **including yourself and any children?**

(enter numeric response)_____

(Ask if more than one person in HH)
Q65. How many of the people in your household are **age 15 or older?**

(enter numeric response)_____

Q66. Which **one or more** of the following would you say is your race? You may select more than one.

- ❑ White
- ❑ Black or African American
- ❑ Latino/Hispanic
- ❑ American Indian or Alaska Native
- ❑ Asian
- ❑ Native Hawaiian or Pacific Islander
- ❑ Middle Eastern or North African
- ❑ Other (Specify) _____
- ❑ Decline to answer

(Ask if Latino/Hispanic)
Q67. Which one of the following **best represents** your ethnicity?

- ❍ Mexican
- ❍ Salvadoran
- ❍ Guatemalan
- ❍ Puerto Rican
- ❍ Other Hispanic (Specify) _____

(Ask if Asian)
Q68. Which one of the following **best represents** your ethnicity?

- ❍ Asian Indian
- ❍ Chinese
- ❍ Filipino
- ❍ Japanese
- ❍ Korean
- ❍ Vietnamese
- ❍ Other Asian (Specify) _____

(Ask if NHPI)
Q69. Which one of the following **best represents** your ethnicity?

- ❍ Native Hawaiian
- ❍ Guamanian or Chamorro
- ❍ Samoan
- ❍ Other Pacific Islander (Specify) _____

(Ask if selected multiple races in Q66)
Q70. Which **one** of the following **best represents** your race? Select only one.

- ❍ White
- ❍ Black or African American
- ❍ Latino/Hispanic
- ❍ American Indian or Alaska Native
- ❍ Asian
- ❍ Native Hawaiian or Pacific Islander
- ❍ Middle Eastern or North African
- ❍ Other (Specify) _____
- ❍ Decline to answer

Q71. Are you currently affiliated with a **nationally recognized Native American Tribe/Indian Tribe?** If so, please specify which one.

    ❍ Yes (Please specify) _____

    ❍ No

(Ask if affiliated with tribe)
Q72. Do you currently **live on Tribal lands?** If so, please specify which one.

    ❍ Yes (Please specify) _____

    ❍ No

(Ask all)
Q73. What **types of phone service** are you and other members of your household currently using that are **<u>not</u> enrolled in LifeLine?**

(select all that apply)

    ❑ Wireless/cell phone for myself or someone in my household

    ❑ Landline phone for the home

    ❑ TTY phone (with landline)

    ❑ TTY phone (with cellphone)

    ❑ Some other phone service (Please specify) _____

    ❑ None of the above/Do not have other phone service

(Ask if use other non-LifeLine phone services at Q73)
Q75. **You may choose to end the survey now, or you may continue to answer a few final questions about your non-LifeLine phone services.**

If you choose to answer a few additional questions about any non-LifeLine phone services you may have, we'll enter your name in the $100 raffle TWICE.

Would you like end the survey now or would you like to continue?

    ❍ I'm finished!

    ❍ I'd like to continue and have my name in the raffle twice

(Ask if finished)

Q76. **Thank you for feedback about the LifeLine discount program.** This information will be used to improve the program.

Would you like to be entered into a drawing to win a $100 gift card?

◯ **Yes, please enter me!** (enter your LifeLine telephone number below)

_____

◯ **No, I don't want to be entered** into the drawing.

OTHER NON-LIFELINE PHONE SERVICES

(Ask if non-LifeLine cell phone user)

Q77. Our next questions are about the **cell phones** that you and other people in your household currently use but are **not enrolled in the LifeLine discount program.**

How many **non-LifeLine cell phone numbers** are currently active in your household?

◯ 1

◯ 2

◯ 3

◯ 4

◯ 5

◯ 6

◯ 7

◯ 8 or more

◯ Don't know

(Ask if non-LifeLine cell phone user)
Q78. How many of the **non-LifeLine {INSERT NUMBER}** active cell phones in your home are **Smartphones?**

A Smartphone is a mobile phone that performs many of the functions of a computer, typically having internet access, and is able to run apps (for example, an iPhone or Android phone).

- ❍ 0
- ❍ 1
- ❍ 2
- ❍ 3
- ❍ 4
- ❍ 5
- ❍ 6
- ❍ 7
- ❍ 8
- ❍ Don't know

(Ask if non-LifeLine cell phone user)
Q79. Just to confirm, do you have **a non-LifeLine cell phone** that is a Smartphone that you use **personally?**

- ❍ Yes
- ❍ No
- ❍ Don't know

(Ask if non-LifeLine cell phone user)
Q80. Which of the following best describes **why you or others in your household chose this non-LifeLine cell phone service provider?**

(select all that apply)

- ❑ I'm familiar with their service or have been using them for a long time
- ❑ Someone I know uses them or recommended them
- ❑ They offer the cheapest rates
- ❑ I like the ads I've seen for them
- ❑ It's the only provider in my area or the only one I've heard of
- ❑ I got a free phone when I signed up
- ❑ It's a family plan
- ❑ I get unlimited talk, text and/or data
- ❑ It was easy to sign up
- ❑ They have the best overall service
- ❑ Some other reason (Specify) _____
- ❑ Don't know/Wasn't my decision

(Ask if non-LifeLine cell phone user)
Q81. Who is the **cell phone service provider** for the **cell phone(s) in your household not enrolled in LifeLine?** *If listing multiple providers, please use a comma between each one.*
(open end response)

(Ask if non-LifeLine cell phone user)
Q82. Please tell us which of the following are included as part of the **non-LifeLine cell phone service plan.**

(select all that apply)

- ❑ Unlimited talk/unlimited minutes
- ❑ Unlimited texts
- ❑ Unlimited data/broadband
- ❑ Free international calls
- ❑ Nationwide coverage
- ❑ 4G or 5G data
- ❑ Something else (Specify) _____
- ❑ Don't know
- ❑ None of these

(Ask if non-LifeLine cell phone user)
Q83. What are the **most important functions/purposes** that you/other household members use **non-LifeLine cell phones** for?

- ❑ Primary personal phone line/contact (phone, text)
- ❑ Primary business/work phone line/contact phone
- ❑ To access the internet (with data)
- ❑ Use as a back-up/emergency phone
- ❑ Other (Specify) _____
- ❑ Don't know

(Ask if non-LifeLine cell phone user)
Q84. How would you rate your household's **overall satisfaction** with your **non-LifeLine cell phone service provider?**

- ○ Not at all satisfied
- ○ Not very satisfied
- ○ Neither satisfied nor dissatisfied
- ○ Somewhat satisfied
- ○ Very satisfied

(Ask if non-LifeLine landline user)
Q85. Our next questions are about your home phone or landline phone that is **not enrolled in the LifeLine program.**

(Ask if non-LifeLine landline user)
Q86. Who is the **service provider** for your **home phone/landline?**
(open-end response)

(Ask if non-LifeLine landline user)
Q87. Which of the following best describes **why you chose your non-LifeLine landline home phone provider?**

(select all that apply)

- ❑ I'm familiar with their service or have been using it for a long time
- ❑ Someone I know uses them or recommended them
- ❑ They offer the cheapest rates
- ❑ I like the ads I've seen for them
- ❑ It's the only provider in my area or the only one I've heard about
- ❑ It's a family plan
- ❑ It was easy to sign up
- ❑ They have the best overall service
- ❑ Some other reason (Specify) _____
- ❑ Don't know/I was not involved in the decision

(Ask if non-LifeLine landline user)
Q88. How would you rate your **overall satisfaction** with your **non-LifeLine** landline phone provider?

- ❍ Not at all satisfied
- ❍ Not very satisfied
- ❍ Neither satisfied nor dissatisfied
- ❍ Somewhat satisfied
- ❍ Very satisfied

(Ask if non-LifeLine landline user)
Q89. What are the most **important functions/purposes** that you use your **non-LifeLine** landline/ home phone for?

- ❑ Primary household phone line/contact
- ❑ Primary business/work phone line/contact
- ❑ Use as a back-up/emergency phone
- ❑ It's my main phone/do not have another phone
- ❑ Other (Specify) _____
- ❑ Don't know

(Ask if non-LifeLine landline user)
Q90. About **how often** do you use your **non-LifeLine** home phone/landline?

- ❍ Everyday
- ❍ A few times per week
- ❍ Once per week
- ❍ A few times per month
- ❍ About once per month
- ❍ Once or twice every 3 months
- ❍ About once every 6 months or less often
- ❍ Never

(Ask if non-LifeLine landline user)
Q91. Please tell us which of the following are included as part of your **non-LifeLine home phone/ landline service plan.**

(select all that apply)

- ❏ Long distance service
- ❏ Free international calls
- ❏ Caller waiting/caller ID
- ❏ Call forwarding
- ❏ Voicemail
- ❏ Something else (Specify) _____
- ❏ Don't know
- ❏ None of these

Q100. Thank you for feedback about the LifeLine discount program. This information will be used to improve the program.

Would you like to be entered into a drawing twice to win a $100 gift card?

- ○ **Yes, please enter me!** (enter your LifeLine telephone number below)

  _____

- ○ **No, I don't want to be entered** into the drawing.