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California Public Utilities Commission

Staff Proposal: California LifeLine Direct Enrollment and Renewal Application Processes Through Customer Portal 2.0 Release

COMMUNICATIONS DIVISION

05/27/2026

2026 STAFF PROPOSAL: CALIFORNIA LIFELINE DIRECT APPLICATION PATHWAY
THROUGH CUSTOMER PORTAL 2.0

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Executive Summary

Staff propose developing and implementing Customer Portal 2.0, an eligibility determination and enrollment process where applicants and renewing subscribers interact directly with the California LifeLine Program (CA LifeLine or Program) through an online portal managed by the California Public Utilities Commission (CPUC) Program's Third-Party Administrator (TPA). Most consumer applicants will receive eligibility determinations in near real time and can then select an eligible Service Provider (Service Provider or Provider) and subsidized plan through a single platform displaying all available service options.

While the CPUC will explore opportunities to enhance and initiate Program awareness and outreach as we take on the primary interaction role, this enhancement will not prevent Service Providers from marketing their services or working directly with applicants. Instead, Service Providers will direct applicants to a CPUC-managed portal rather than separate Provider-specific portals. Service Providers will remain essential partners by assisting applicants with enrollment, if requested by an applicant, and activating service after eligibility approval.

The proposed changes will strengthen program integrity and oversight, enhance fraud prevention, improve transparency for consumers, and align CA LifeLine's administrative structure with evolving technological standards.

Background of Current Enrollment Process and LifeLine's Customer Portal 1.0

Under the current CA LifeLine enrollment operating model, consumers seeking CA LifeLine discounts begin the enrollment process with a CPUC-authorized Service Provider, rather than directly with the Program. Service Providers and their agents collect consumer application information, evaluate eligibility, and submit enrollment requests to the CPUC's TPA, who processes the application and makes the final eligibility determination. While this model has enabled broad consumer participation, evolving automation practices and a centralized consumer enrollment platform will improve Program oversight, customer experience, and real-time eligibility controls.

Specifically, under the existing structure, duplicative enrollment requests across multiple Service Providers are common, and unauthorized Service Provider transfers can be difficult to prevent proactively. These circumstances increase the risk of waste, fraud, and abuse. In addition, consumers often experience a fragmented process with limited visibility into the status of their enrollment. The Program increasingly relies on automated database verification as a key tool to confirm both identity and eligibility. This process involves secure, automated data matches with eligibility databases of the other state agencies that manage public benefit programs. For example, the Program currently verifies eligibility through database connections with CalFresh and Medi-Cal. Successful automated checks allow near real-time approvals, removing the burden of providing supporting documentation from the applicant, as well as improving overall program efficiency and accuracy. With these technological advancements, consumers likewise expect more immediate digital access to track the status of their application and manage their account preferences.

In November 2023, the Program launched Customer Portal 1.0 (Portal 1.0) as part of a broader modernization effort. The initial release allowed new or existing customers to create a portal account, update demographic characteristic information, view the status of their current CA LifeLine discount or pending forms, and to complete and submit outstanding forms (such as renewal and identity verification forms).

Portal 1.0 was released in compliance with Web Content Accessibility Guidelines (WCAG) and was created to establish a secure, direct channel for applicants and subscribers to get information about their accounts, such as the provider of their service. It also created a foundational platform designed to support phased enhancements over time

Since its launch, the Program has enhanced Portal 1.0 to increase transparency and provide additional self-service options for participants. For example, in February of 2024, the Program implemented the ability for eligibility decision letters to be generated in PDF format, allowing registered portal users to view and download their eligibility approval letters directly from their portal account, rather than waiting for the letters to be sent via mail.

While Portal 1.0 has been successful within its initial scope, Customer Portal 2.0 will significantly enhance the current model and improve the overall consumer experience.

Overview of the Proposed Portal 2.0 Model

Supporting direct eligibility applications to the Program represents the next step in modernizing and streamlining the CA LifeLine enrollment process. In doing so, Portal 2.0 will carry over all the functions and benefits of Portal 1.0. For example, Portal 2.0 will keep in compliance with WCAG and will maintain the ability for a user to click on the ‘translate’ icon to change the language in which they are viewing on the Portal. The proposed enhancements would allow the customer to complete the eligibility determination process directly through the Program’s customer portal, rather than relying on Service Providers to initiate enrollment. This change is intended to significantly improve the overall customer experience, reduce barriers to participation, and create a more intuitive enrollment process for customers seeking access to essential communications services through the CA LifeLine program.

Portal 2.0 aligns more closely with the federal Lifeline enrollment model, which allows a consumer to apply directly to the program through the National Verifier consumer portal or by paper applications through mail. Aligning the state and federal enrollment processes where possible may help reduce confusion for applicants who are applying for Lifeline at both state and federal levels.

This alignment became increasingly important following the changes to the federal Lifeline program. On November 20, 2025, the Federal Communications Commission (FCC) issued Order 25-965¹, which ended the federal Lifeline National Eligibility Verifier (National Verifier) processes in California.

¹ See *Lifeline and Link Up Reform and Modernization*, WC Docket No. 11-42, Order, DA 25-965 (WCB 2025), available here: <https://docs.fcc.gov/public/attachments/DA-25-965A1.pdf>.

Specifically, the Order eliminated the National Verifier's reliance on California LifeLine eligibility determinations for enrollment in the federal Lifeline program. Thus, as of February 1, 2026, customers must apply separately to receive the federal Lifeline discount and the California LifeLine discount.

With this change, applicants must submit two different applications through their Service Provider if they wish to receive both discounts. To the extent CA LifeLine Program is able to align its processes, this will help avoid unnecessary confusion for applicants, provide consistent user experience across programs, and simplify how customers navigate the enrollment process.

To support these objectives, staff propose the following improvements be implemented as part of Customer Portal 2.0, with additional potential enhancements to be released in future iterations of the portal:

Direct-to-Program Application and Provider Selection: A Three-Pronged Approach

Under the proposed application framework, an applicant would initiate and complete their application themselves online via Customer Portal 2.0. It is important to note that while all applications would be submitted directly to the Program via Portal 2.0, there are three potential pathways for an applicant to complete the enrollment process to accommodate a variety of consumer needs, preferences, and levels of digital access. The following pathways ensure that consumers are able to independently apply for the CA LifeLine discount, receive assistance from Providers, or combine both approaches depending on their individual circumstances.

1. Enrollment and Provider Selection Through Customer Portal 2.0:

To begin the enrollment process, applicants would log into their existing account on Portal 2.0, or create a new account if they are accessing the system for the first time. Creating an account would allow applicants to securely access the application, track the status of their enrollment, and return to the portal later to review or update important personal information related to their Program application.

Once logged in to the portal, individuals may start a CA LifeLine application directly through their portal account. The application would include built-in guidance features designed to assist applicants through completion of the application. These features may include contextual text help, explanations of eligibility requirements, and prompts to guide applicants through each section of the application. The purpose of these tools is to reduce confusion, minimize application errors, and make the enrollment process easier to navigate for returning and first-time applicants.

Applicants who prefer additional assistance would also have the option of contacting the TPA's call-center to receive step-by-step guidance while completing and submitting their online application. Call center representatives are available Monday-Friday, excluding state holidays, from 7:00am – 7:00pm PT and can walk applicants through the application process and answer questions. Additionally, if preferred, applicants may also request that a paper application be mailed to them.

Eligibility Verification and Identity Authentication

Upon submitting an application through the portal, the TPA will conduct the identity authentication process and determine eligibility for a CA LifeLine discount.

For most applicants, identity authentication and eligibility verification will occur in near real time through automated database checks. These automated processes allow the system to confirm the applicant's identity and eligibility using databases without requiring additional documentation from applicants. Applications that cannot be verified automatically or requiring additional review, will be routed for manual processing by the TPA and may require follow-up requests for supporting documentation.

Enrollment ID and Provider Selection

Applicants whose eligibility is successfully verified will receive an Enrollment Identification Number (Enrollment ID). The Enrollment ID serves as a unique identifier confirming that the applicant has been approved for the Program.

After approval, applicants will be given the opportunity to select a participating Service Provider through the portal. The portal will include tools to help applicants review available Provider options and service plans, allowing them to make an informed selection. Applicants may:

- Enter their ZIP code to view participating Providers operating in their area;
- Review available plans and compare offerings associated with each Provider; or
- Select a Provider directly through the portal.

Once the applicant selects their Service Provider through the portal:

- The TPA will transmit the enrollment information to the selected Service Provider.
- The Service Provider will have forty-eight (48) hours to accept the enrollment.

If the Service Provider does not accept the enrollment within the forty-eight (48) hour period, the selection will be voided, and the applicant will receive a notification with a link that they may click to return to the portal and choose another Provider.

Applicants will have forty-five (45) days from the date of approval to select a Service Provider. This timeframe provides applicants with flexibility to review available Provider options and determine which service best meets their needs. If the applicant does not select a Provider within the forty-five (45) days, their application would effectively be denied. In this scenario, the applicant would receive a notification that their application has been denied, including a description of the reason for denial and instructions on how to reapply when they are ready to proceed.

2. Enrollment through Service Providers After Receiving Enrollment ID:

Alternatively, after receiving their approval, applicants may also choose to complete enrollment with a Service Provider directly, rather than selecting their Provider on the portal.

If an individual is working directly with the Service Provider after receiving their Program approval, the applicant may provide the Service Provider with the enrollment ID received from the TPA with the approval of their application. The Service Provider can then activate the applicant's enrollment through their established submission channel, including:

- the Service Provider Intake Application (SPIA) system;²
- the daily file process (file process);³ and
- the private website for web-based Service Providers.⁴

Once the Service Provider submits the Enrollment ID through its established system, the TPA will confirm the enrollment and initiate program discount(s).

3. Enrollment through Provider Assistance –Before Receiving Enrollment ID:

Service Providers and their recruitment agents (popularly known as “street teams”) may often be the first point of contact for consumers interested in learning about and applying for a CA LifeLine discount. For example, potential applicants may encounter Service Providers at retail locations, community events, public programs serving eligible populations, or various locations and events that recruitment agents target.

In many cases, a potential CA LifeLine applicant physically present with a Service Provider may not yet have applied for CA LifeLine. Under the proposed portal enhancements, Service Providers would be able to direct consumers to californialifeline.com to apply, and if needed, the Service Provider may guide the customer through the process of logging in or registering for

² SPIA is a web-based Application Programming Interface solution that enables service providers to submit new applications, renewal forms, and subscriber transfer requests; update applicant and subscriber information; cancel pending applications; and/or de-enroll subscribers in near real-time. The purpose of SPIA is to provide quick data processing, which improves efficiencies for eligibility decisions and LifeLine participant status updates.

³ The Daily Batch File Process is a means by which the TPA and Service Providers that are not utilizing SPIA may communicate on behalf of their customers. Service Providers' daily upload files contain actionable activity types performed by the TPA. The activity files contain any matching failures and error code(s) from the validation process, while the return files contain decisions rendered by the TPA and/or feedback to the Service Providers.

⁴ The Private Website for Web-Based Service Providers is a secure online tool provided by the TPA to participating LifeLine service providers which allows them to view their customers' accounts as stored in the LifeLine database. Service Providers that are set up as Web-based providers can submit enrollment requests, edit customer account details, and remove/disconnect customers from the Program.

their portal account and completing and submitting the application directly through the customer portal.

As described previously, for most applicants, identity authentication and eligibility verification will occur in near real time. Upon approval and issuance of an enrollment ID, the Service Provider may immediately activate that applicant's enrollment by submitting the Enrollment ID to the TPA through its established submission channel.

This three-path enrollment framework gives potential applicants options by allowing them to either apply independently through the portal or by receiving direct assistance from a Service Provider. This, along with the mail application option, helps ensure that the program remains accessible to a broad range of customers while modernizing the enrollment process. As with the current process, Service Providers would still be able to use established channels to request that the TPA initiate the paper application process if a customer asks the Provider for a paper application.

Figure 1 below provides a visual representation of the proposed enrollment flow under the Customer Portal 2.0 model.

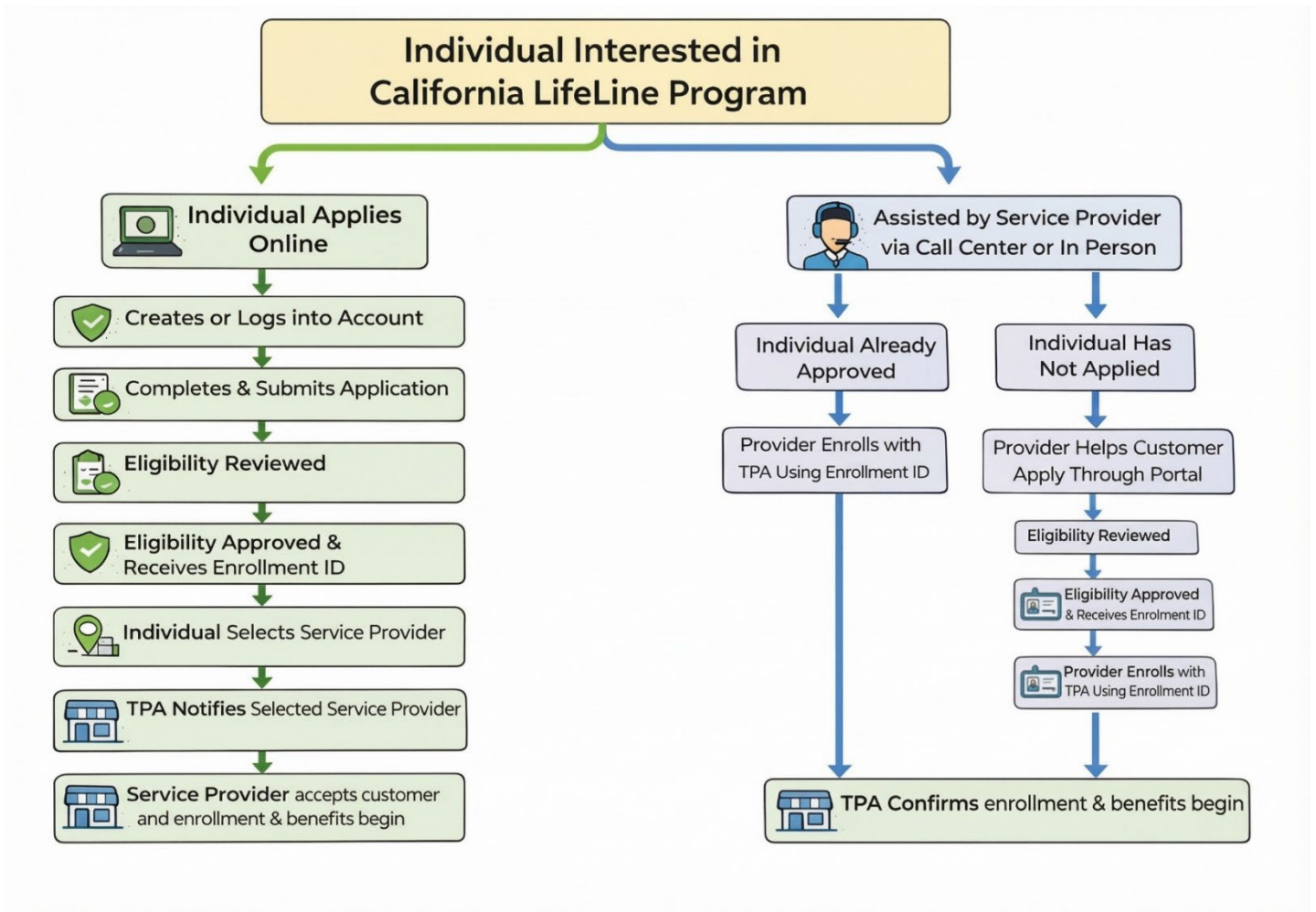


Figure 1: Customer Portal 2.0 Enrollment Flow

Additional Portal 2.0 Changes

- **Direct-to-Program Annual Renewals:**

As is the current process, the TPA will always try to auto-renew applicants through existing database checks for CalFresh and MediCal. Currently, 97% of program-based participants are approved through their CalFresh or MediCal benefits, so most subscribers who are eligible to continue their California LifeLine service are auto-renewed without the necessity of subscriber involvement with the renewal process.

Staff proposes that the TPA initiate the renewal process ninety (90) days in advance of a subscriber’s Program anniversary date, to align California’s renewal timeline with the federal renewal timeline and simplify the renewal process for consumers. Currently, the Program

initiates the renewal process one hundred and five (105) days in advance of the subscriber's anniversary date. This timeline was initially created to give an absorbent amount of time for consumer responses when renewals were primarily handled through the mail process. With technology advancements through database matches and the implementation of the customer portal, less than 7% of renewals are processed through mail, and ninety (90) days has been more than sufficient to process renewals occurring through that channel.

Upon initiating the renewal timeline, the Program will automatically check the subscriber's continuing eligibility using CalFresh or MediCal database checks. If the Program determines the subscriber is still eligible, the subscriber will be notified of an 'intent to approve' their subsidy renewals and that no action is required on their part. If the Program has determined the individual is potentially ineligible because the CalFresh and/or MediCal database checks were unsuccessful, the subscriber will receive advance notification of an 'intent to deny,' so the individual has sufficient time to act.

In a scenario where an individual needs to manually complete the renewal process, they would be prompted to log in to their portal account to complete and submit their renewal application packet, including uploading any required supporting eligibility documentation. If the subscriber does not submit a renewal application and eligibility documentation through the portal within 10 business days of the 'intent to deny' notification, the TPA will automatically mail a paper renewal application to the subscriber's mailing address, as then stored in the TPA's LifeLine Subscriber database.

Final renewal determinations will be issued on the subscriber's anniversary date, with notification provided to both the subscriber and the Service Provider.

- **Subscriber-Controlled Transfer Protections:**

Customer Portal 2.0 will embed transfer control functionality directly into each subscriber's secure portal dashboard.

On October 23, 2025, the Program launched a Consent to Transfer form for wireless subscribers. The Consent to Transfer form captures a subscriber's data and their consent when transferring from one Service Provider to another. A key control measure is that the form must correctly identify the subscriber's current Service Provider, which only the subscriber would know. Failure to identify the correct Service Provider on the form causes the transfer to fail and initiates a twenty-four (24) hour freeze for all transfer activities related to the subscriber. This new process has reduced the number of unauthorized transfers that are occurring, however, the Program introduced this form as a first step in slowing unauthorized transfers. More robust features will be made possible with the implementation of Portal 2.0.

Introducing the Consent to Transfer process was a necessary action the Program took to stem the rampant increase in unauthorized transfers from one Service Provider to another. Since the

March 14, 2022 introduction of the SPIA Submit Application method, the Program has received a significant increase in complaints regarding unauthorized transfers. Whereas the TPA received 952 complaints during the 12-month period of calendar year 2021, the TPA received 20,334 complaints during the 12-month period of September 2024-August 2025 – an increase of 2,036%. There have been instances where customers were transferred multiple times without their consent, causing disruption of service and at times the loss of their phone numbers and important data.

The implementation of the Consent to Transfer process allows subscribers a way to safeguard their CA LifeLine service and block unwanted transfers from occurring. Since the launch of the Consent to Transfer Process, monthly transfer volumes have declined by more than 50% and consumer complaints related to unauthorized transfers have similarly decreased by more than 50%. This data demonstrates that the Consent to Transfer Process has been effective in strengthening consumer protections. At the same time, it underscores the need for more robust, system-based controls to further prevent unauthorized activity.

As part of the Customer Portal 2.0 release, the Program will strengthen unauthorized transfer protections by implementing new transfer functionality within the subscribers' portal dashboard. This functionality will replace the existing Consent to Transfer form process, which was intended as a temporary solution. With transfer controls embedded in each subscriber's portal account, subscribers will be able to manage transfer permissions directly. Upon logging into their account, a subscriber will have functionality to "lock" or "unlock" their transfer preference. If a Service Provider attempts to transfer a subscriber who has set their transfer preference to "locked", the TPA system will return an error message indicating that transfer of this subscriber's LifeLine service is currently locked.

Subscribers may modify transfer preferences at any time through the portal or by contacting the TPA's call center for assistance.

This enhancement embeds proactive fraud prevention within the centralized eligibility system and provides subscribers with direct control over their LifeLine service.

Summary of General Order 153-A Changes:

In order to implement these changes, staff propose edits to General Order 153-A, which are included in Appendix B. The key changes are summarized as follows, but see Appendix B for a comprehensive list of edits:

- Section 2.4 "Application Date" – The date a new or existing Customer ~~calls~~ submits his/her California LifeLine application requesting LifeLine service. ~~Service Provider and requests LifeLine Service.~~ The "Application Date" serves as the starting point for LifeLine discount back-credits once the California LifeLine Administrator determines eligibility and notifies the applicant's California LifeLine Service Provider.

- Section 2.37 “Pre-Qualification” – The process by which California LifeLine Applicants apply for California LifeLine, but do not receive the California LifeLine discount until their applications have been received and approved by the California LifeLine Administrator and their LifeLine service has started with their service provider of choice.
- Section 2.5.8 “California LifeLine Customer Portal or Customer Portal” – An online portal managed by the Program’s Third-Party Administrator (TPA or CA LifeLine Administrator) where applicants and renewing subscribers interact directly with the Program for the eligibility determination and enrollment process.
- Section 4.1.1 California LifeLine Service Providers shall inform new residential Customers calling to establish Basic Service or non-regulated voice service, as applicable, about the availability of California LifeLine, a discount program for Customers with a Household member currently enrolled in qualifying ~~certain public~~ assistance programs or Customers with qualifying Household income. If Customers indicate that they are interested in applying for California LifeLine, California LifeLine Service Providers shall direct the Customer to the Program’s website to complete the application. If needed, the Service Provider may assist the customer with applying to the Program. Alternatively, the Service Provider may contact the California LifeLine Administrator to begin the California LifeLine Paper Application Process for the Customer in accordance with Section 4.2 of this General Order and the Timeline for Processing California LifeLine Qualifications (found at <https://www.californialifeline.com>).
- ~~Section 4.1.3 In accordance with the Timeline for Processing California LifeLine Qualifications (found at <https://www.californialifeline.com>), California LifeLine Service Providers shall send a confirmation notice to all California LifeLine Applicants informing them of the arrival of Application Forms from the California LifeLine Administrator and the requirement to return the completed Application Forms with all required documentation. The notice shall also inform California LifeLine Applicants that failure to return the Application Forms and eligibility documentation by the Deadline Date will result in the denial of the application for discounted California LifeLine telephone service.~~
- Section 4.2.1 Potential California LifeLine Customers may apply directly to the California LifeLine Program online at californialifeline.com, or alternatively, may request a paper application be mailed to them to complete and return to the California LifeLine Administrator.
- Section 4.2.2 If a Customer has contacted or selected a Service Provider prior to applying, California LifeLine Service Providers shall direct the Customer to the Program’s website to complete the application. If needed, Service Providers may assist the customer with applying to the Program. California LifeLine Service Providers shall first ask the Customer whether he/she is currently or within the last 30 days has been enrolled in California LifeLine by another California LifeLine Service Provider.
- Section 4.2.2.1 If yes, the California LifeLine Service Provider shall then contact the California LifeLine Administrator to validate the customer’s approved status. The California

LifeLine Service Provider shall inform the Customer that the California LifeLine Administrator will notify the Customer and the Customer's current California LifeLine Service Provider once it determines whether or not the Customer is currently or within the last 30 days has been enrolled in California LifeLine. If the California LifeLine Administrator cannot confirm the Customer's continued eligibility, the Customer will be treated as a new California LifeLine Applicant and be subject to the Application Process, [which the Service Provider can then direct the customer on how to proceed as described under section 4.2.2](#)

- Section 4.2.2.2.1 If yes, read the Program-Based Criterion for qualifying assistance programs listed in Section 5.1.5 of this General Order and ask the customer whether any household member is enrolled in any of these programs. The California LifeLine Administrator may determine if the Customer is enrolled in any of the qualifying assistance programs listed in Section 5.1.5 through access to those qualifying programs' databases and may communicate that eligibility to the California LifeLine Service Provider. California LifeLine Service Providers must use the step-down approach when reading the qualifying assistance programs and stop when the customer confirms that a Household member is enrolled in an ~~non~~-qualifying assistance ~~approved~~ program.

If the Customer indicates participation in a [qualifying assistance approved public](#) program, immediately contact the California LifeLine Administrator to begin the [Paper Application Process](#), [or, direct the Customer to the Program's website to complete the application](#). [If necessary, the Service Provider may assist the customer with completing the online application.](#) ~~If selecting the paper application pathway, the Service Provider shall~~ [and](#) inform the Customer that: (i) the Customer will receive an Application Form in the mail or [may](#) apply online; (ii) the Application Form must be completed and signed by the person whose name appears on the form and returned to the California LifeLine Administrator before the response date indicated on the form; and (iii) specify any deposits required; (iv) a payment plan is available for nonrecurring charges and deposits relating to Basic Service, and (v) the California LifeLine Administrator will notify the Applicant and the Applicant's California LifeLine Service Provider once it determines whether or not the Applicant is eligible for California LifeLine.

- Section 4.2.2.3.1 If the Customer indicates that they/ he/ she is eligible under the income guidelines, immediately contact the California LifeLine Administrator to begin the California LifeLine [Paper Application Process](#), [or, direct the customer to the Program's website to complete the application](#). [Throughout the Application Process, the Customer must be informed of each of the following, and if a Service Provider is assisting the customer with completing the online application, the Service Provider must communicate each item to the Applicant:](#) ~~The California LifeLine Service Provider shall also inform the Customer~~ that they/he/she must also provide income document(s) substantiating the household income, and inform the Customer that: ~~(i) the Customer will be receiving an Application Form in the~~

~~mail or online~~; (i) the Application Form must be completed and signed by the person whose name appears on the form, and returned to the California LifeLine Administrator before the response date indicated on the form; (ii) a copy of the supporting income document(s) that reflect Total Household Income must be included with the Application Form; (iii) a payment plan is available for nonrecurring charges and deposits relating to Basic Service; and (iv) the California LifeLine Administrator will notify the Applicant and the Applicant's California LifeLine Service provider once it determines whether or not the Applicant is eligible for California LifeLine.

- Section 4.2.5 ~~If the Applicant has not yet been approved~~, California LifeLine Service Providers shall inform California LifeLine Applicants that they will incur Regular Rates and charges until approval of their California LifeLine Application Form. California LifeLine Service Providers shall offer California LifeLine Applicants a payment plan for any non-recurring charges and deposits for non-LifeLine service, and shall inform Applicants of the existence of such plans.
- Section 4.2.6 Wireless LifeLine Providers shall inform Subscribers prior to service initiation of the two restrictions below. ~~Program disclosures may be presented through verbal, electronic, or written formats, approved by the Commission.~~
- ~~Section 4.4.1.2 The Application Form will be partially completed by the California LifeLine Administrator based on information provided by California LifeLine Service Providers.~~
- ~~Section 4.5.2 The Renewal Forms will be partially completed by the California LifeLine Administrator based on information provided by California LifeLine Service Providers.~~
- Section 5.3 No California LifeLine Service Provider shall knowingly assist in enrolling into California LifeLine an Applicant who does not meet the California LifeLine eligibility criteria. No California LifeLine Service Provider shall knowingly allow a Subscriber to remain in California LifeLine who does not meet the California LifeLine eligibility criteria.
- Section 5.4.2 The Application Form shall be signed by the Applicant whose name appears on the California LifeLine Program application ~~Service Provider's account~~, the Applicant's legal guardian or a person operating pursuant to a power of attorney for such Applicant.
- Section 5.4.2.5 The Application shall provide the following information to each Applicant, and the Applicant must initial their/ his/ her acknowledgement of each notification:
 - (a) the Applicant meets the Income-Based Criterion or the Program- Based Criterion for receiving LifeLine; (b) the Applicant will notify the ~~California LifeLine Administrator and the~~ Carrier within 30 days if for any reason they/ he/ she no longer satisfies the criteria for receiving LifeLine support, the Applicant is receiving more than one LifeLine benefit, or another member of the same Household is receiving a LifeLine benefit; (c) if the Subscriber is seeking to qualify for LifeLine as an eligible Resident of Tribal lands, the/ he/ she lives on Tribal lands; (d) if the Applicant moves to a new address and intends to retain LifeLine support, they/ he/ she will provide that new address to their California LifeLine ~~Administrator Service Provider~~ within 30 days;
- Section 5.6 California LifeLine Subscribers must notify their California LifeLine ~~Administrator and~~ Service Provider of any change that causes the California LifeLine

Subscriber to no longer qualify for (i) California LifeLine, or (ii) a second California LifeLine Line. Within ~~five~~ ~~three~~ business days of receipt of this notification, the California LifeLine Administrator will notify the subscriber's Service Provider, who will change the Subscriber's California LifeLine Service to Basic Residential Telephone Service. No Service Conversion Charges shall be billed to the Subscriber for this change in service.

- Section 5.6.2 If a LifeLine Service Provider receives a request from the California LifeLine Administrator to de-enroll a subscriber ~~a Subscriber to de-enroll~~ from the LifeLine program, the LifeLine Service Provider shall de-enroll the Subscriber within two business days after the request.
- Section 5.6.3 If a LifeLine Service Provider receives a request from a subscriber to de-enroll from the LifeLine Program, the LifeLine Service Provider shall notify the administrator within two business days after the request.
- Section 5.11.1 The duration of the enrollment request freeze shall begin after the Applicant selects their Service Provider and the Service Provider and Administrator have successfully completed the Applicant's enrollment process. ~~when the California LifeLine Administrator generates an application packet~~
- Section 5.11.5.1 ~~California LifeLine Administrator sends the final eligibility decision to the Applicant;~~ Service Provider notifies the California LifeLine Administrator of the subscriber's new telephone number.
- Section 5.11.5.2 The Applicant or California LifeLine Administrator ~~Service Provider~~ cancels at Applicant's the request; or
- Section 5.11.5.3 Thirty days have passed since the Service Provider agreed to enroll the applicant ~~California LifeLine Administrator generated the application packet or confirmed that the request is an inter-Carrier transfer request whereby the benefit portability freeze duration does not apply.~~
- Section 6.3.3.1 Newly enrolled Subscribers who are found eligible to participate in California LifeLine during the Application Process and selected them as their Service Provider.
- ~~Section 6.3.3.2 Applicants who are found ineligible to participate in California LifeLine during the Application Process.~~
- Section 9.3.8.1.1 Demonstrably Incremental Costs should be reported as part of the claims disclosure. These include costs associated with the time spent by California LifeLine Service Provider representatives to (i) provide required notifications to Residential Customers about the availability of California LifeLine, (ii) ask Residential Customers if they are eligible to participate in the California LifeLine program, (iii) obtain verbal, written, or electronic indication from Residential Customers regarding their eligibility to participate in the California LifeLine program, (iv) inform Applicants that they must return the signed Application Form on or before the Deadline Date specified on the form, and (v) inform Applicants of the yearly renewal requirement.
- Section 12.2 California LifeLine Applicants and Subscribers also have the option of completing their application ~~(program based only)~~ or renewing their continued eligibility via

the California LifeLine interactive website, which can be found at the following address: <http://www.californialifeline.com>. Program applicants and subscribers will register their email addresses as their Customer Portal usernames and will create their own passwords.

- Appendix B, Section III General Order 153

GO 153 sets forth rules and requirements of the California LifeLine program. Rules include filing schedules of rates and charges; **verbal, written, or electronic** communications with Residential Customers; in-language communications; residential customers' and service providers' eligibility to participate in the program; transmission and sharing of information for purposes such as eligibility determination, de-enrollment, and reimbursement of claims; California LifeLine Service elements, rates, and charges; reimbursement methodology and amounts; claims-related requirements and process; surcharge-related requirements and process; audits; and record retention.

Potential Future Customer Portal and Program Enhancements:

In addition to the enhancements proposed under Customer Portal 2.0, staff are exploring future portal and Program capabilities that would further expand equitable access, strengthen Program integrity, and improve consumer navigation of available services. These enhancements are not part of the immediate proposed implementations but represent future phases of potential development.

- **Trusted Partner Integration Framework:**

The Program is exploring the establishment of a Trusted Partner pathway to expand equitable, community-based access to LifeLine. Under this framework, approved Community-Based Organizations (CBOs) and Community-Based Programs would be authorized to assist consumers with identifying eligibility and completing enrollment applications through the Customer Portal. This model would function similarly to the Service Provider “street team” approach. Staff envision this pathway as a means to expand access in underserved communities, particularly for individuals with limited digital literacy, language barriers, or limited connectivity. Before pursuing this potential enhancement, staff would collaborate with parties and consumer groups through a future staff proposal.

- **Eligibility Mapping Tool and Guided Service Experience:**

Staff are also evaluating development of an interactive mapping and guided eligibility tool within the Customer Portal. Under this concept, individuals could enter their address and receive guided information about potential eligibility pathways. For example, if an individual resides on tribal lands, the system could flag potential eligibility through

approved tribal programs. A mapping tool would provide a more intuitive user experience, reduce applicant confusion, and support equitable outreach by proactively identifying specialized eligibility categories.

- **California Service Provider Database Integration:**

The Program is considering integration of a centralized California Service Provider database within the Customer Portal, similar in function to the federal Representative Accountability Database (RAD) used in the federal Lifeline Program. A California-specific database could:

- Centralize provider identification and authorized representative information
- Strengthen oversight of enrollment activities
- Enhance monitoring of recruitment agents
- Improve program integrity controls

Embedding this database within the portal ecosystem would further align California LifeLine operations with national integrity standards while maintaining state-level program authority and oversight.

- **Integration of Outreach and Awareness Strategies:**

As the Program transitions to an eligibility-centric model in which consumers may interact directly with the CA LifeLine Program, staff will also explore opportunities to enhance program awareness and outreach. This includes evaluating strategies to better inform eligible consumers about the availability of the LifeLine discount, as well as how to determine their eligibility and apply directly to the Program through Portal 2.0. These efforts may include targeted outreach designed to reach underserved and unserved populations. Expanding program awareness will be an important complement to Portal 2.0, ensuring that eligible households are informed of their options and able to access services through multiple pathways.

Conclusion

Customer Portal 2.0 represents a significant structural modernization of the CA LifeLine Program. By centralizing eligibility determinations, strengthening fraud prevention controls, and improving transparency and consumer choice, the proposed framework advances program integrity while improving the consumer's experience.

The Program-centric eligibility model preserves the collaborative role of Service Providers while establishing the TPA as the system of record for eligibility, enrollment history, identity authentication, and transfer protections. This approach enhances oversight, supports real-time administration, and aligns program operations with evolving technological capabilities and regulatory expectations.

Accordingly, staff recommend approval of Customer Portal 2.0 and the proposed Program-centric eligibility model consistent with statutory objectives, consumer protection principles, and the Commission's oversight responsibilities.

Questions To Guide Party Comments

1. Does the proposed eligibility-first determination model appropriately balance consumer protection, program integrity, and operational efficiencies? Please explain your response.
2. Are there specific California low-income consumer populations that may experience challenges during the transition? If so, please describe those populations and recommend mitigation strategies for consideration.
3. Are the proposed timelines for post-approval enrollments sufficient for Service Providers (i.e., once the TPA has notified a Service Provider that an approved applicant has selected them, the Service Provider has 48 hours to 'accept' the applicant)?
4. Are there operational challenges/risks Service Providers might encounter when transitioning to the Program-centric eligibility determination model? If so, please describe the challenges and recommend mitigation strategies for consideration.
5. Is there a recommended transition period Service Providers anticipate needing to accommodate a successful transition to the proposed program-centric eligibility enrollment model through Portal 2.0?
6. Are there any proposals or concepts that parties suggest staff consider in a future Trusted Partnership Staff Proposal?