

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17406
October 17, 2013**

R E S O L U T I O N

Resolution T-17406. United Way of Santa Cruz County. Request for certification as the 2-1-1 service provider for United Way of San Benito County. By Letter to Executive Director filed on May 29, 2013.

Summary

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

Background

2-1-1 is the national abbreviated dialing code designated by the Federal Communications Commission to be used to phone non-emergency community I&R providers. Upon dialing 2-1-1, a caller will be routed to a referral service and then to an agency that can provide information concerning social services, such as housing assistance, programs to assist with utility bills, food assistance and

other less urgent situations not currently addressed by either 9-1-1 or 3-1-1 services.

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

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

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

The Commission's Executive Director received the application letter¹ filed by UWSCC requesting certification as the 2-1-1 service provider for San Benito County on May 29, 2013. UWSCC sent copies of its application letter to the R.02-01-025 service list on July 26, 2013. Subsequent to the filing, UWSCC filed a supplemental letter received by the Commission's Executive Director on July 19, 2013, to include Public Safety matters. On August 5, 2013, UWSCC emailed copies of the supplemental letter to the service list for R.02-01-025.

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

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

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

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

Notice/Protests

UWSCC confirmed that it mailed a copy of its application letter to the Commission and to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers. Additionally, upon AT&T's request, the Communications Division (CD) forwarded a copy of the UWSSC's application to AT&T on July 22, 2013.

CD published notice of UWSCC's application letter in the Commission Daily Calendar on July 15 through August 5, 2013. In response to the notice, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated July 29, 2013, supporting the request of UWSCC to use the 2-1-1 dialing code to serve in San Benito County. No other comments were submitted.

Discussion

The first section of the prescribed application demonstrates that UWSCC was established as a non-profit organization in 1954 and has the authority to operate in California as a non-profit. It describes the organizational structure, background and experience of UWSCC.

In October, 2011, the Santa Cruz Regional 9-1-1 began providing 9-1-1 service to San Benito County. The leaders of 9-1-1 in Santa Cruz encouraged San Benito County to support 2-1-1 service. Thus, United Way volunteers and staff in San Benito County began discussing the need for 2-1-1 services in the autumn of 2012.

In the spring of 2013, the San Benito County 2-1-1 Steering Committee also met several times with providers from other counties and determined that the 2-1-1 service would improve information and referral services in San Benito County. Therefore, it was determined by the 2-1-1 Steering Committee that San Benito County would mirror that of 2-1-1 Santa Cruz County organizational structure. United Way of Santa Cruz County is the legal entity operating United Way of San Benito County (UWSBC). As such UWSCC and UWSBC will be responsible for fundraising and outreach for 2-1-1 in San Benito County. UWSCC will enter into a contract for services with United Way of the Bay Area (UWBA) for creating and maintaining the resource database and using the iCarol software for San

Benito County. The UWBA is in contract with Interface Children and Family Services (Interface) to operate the Call Center for several counties including Santa Cruz and San Benito County. UWBA will bill UWSCC for the 2-1-1 call from San Benito County.

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

Interface is a nonprofit organization classified under section 501(c)(3) of the Internal Revenue Code. Interface is governed by a volunteer Board of Directors with operations managed by Executive Director, Erik Sternad.

Interface will provide Information and Referral (I&R) service for San Benito County by live I&R Specialist 24 hours a day, seven days a week. Interface currently provides its I&R services in English, Spanish, Cantonese, Mandarin and Vietnamese and contracts with Tele-Interpreters, a telephone interpretation service that allows access to 160 languages.

UWSCC provided a three-year budget for San Benito County service as part of their application. UWSCC's budget and financial statements appear in a stable and solvent financial position and have appropriate budgetary planning procedures to support 2-1-1 service at current call volumes.

Safety Considerations

In the third section of the prescribed application, the applicant must demonstrate its understanding of and must agree to adhere to the standards for delivery of I&R services as established by the Alliance of Information and Referral Services (AIRS). United Way of Santa Cruz County I&R program has internal protocols to ensure calls are handled consistent with guidelines developed by AIRS. AIRS' guidelines are the basis for the service delivery standards associated with use of the 2-1-1 dialing code as specified by the CPUC Decision 03-02-029. UWSCC's application includes descriptions of its policies in the areas of call assessment and

follow-up, confidentiality, database standards, disaster readiness, reports and measures, cooperative relationships, training, marketing, and program evaluation. These policies appear to meet the standards established by AIRS.

UWSCC has a formal agreement with Santa Cruz County/San Benito County 211 Emergency Center Operating Procedures (EOC) with the Regional 911 Center which provides 9-1-1 services to San Benito and Santa Cruz County.

2-1-1 Santa Cruz will transfer calls appropriately directed to 9-1-1 during an emergency situation, and 9-1-1 is prepared to refer callers to 2-1-1 when the caller's situation is not an emergency. This partnership will more effectively use San Benito County local resources and will relieve the 9-1-1 operators of unnecessary calls year round, as it does in Santa Cruz County.

In the event of a natural disaster or emergency situation, EOC procedures will be implemented. UWSCC have verbal agreements with local and regional television and radio stations to broadcast in English and Spanish the message to call 2-1-1 for all non-life threatening questions during a disaster or emergency situation. The County of San Benito Public Information Officer will provide 2-1-1 with all authorized information to communicate to the public during the disaster situation.

In partnership with the Santa Cruz Regional 911 Center, which provides 911 services to San Benito County and operates the Emergency Operations Center, 2-1-1 San Benito County will provide current, up-to-date, critical public information related to emergency/disaster incidents, including status of the disaster, evacuations, road closures, shelters, affected areas, and recovery and relief programs.

As a partner with UWSCC, Interface has extensive experience providing service during local and national disasters, responding to the needs of those injured or dislocated, service providers and the general public. The Interface Call Center will provide "warm" telephone transfers to enable residents to access necessary services immediately. The resource and caller intake databases are backed up nightly, and the Resources Coordinator maintains a copy offsite. The Interface

Call Center has an emergency/disaster plan that will be implemented as needed to assure that call services are available 24 hours a day, seven days a week.

Interface is located on a redundant power grid so that power outages are less likely. In case of phone outages, Interface also has Telephone Priority Status from the Federal Communications Commission for restoration of service with AT&T. Agreements such as the Memoranda of Understanding are being developed with local and out of area partners to enhance offsite operational capacity. Plans are in place for an onsite diesel generator and UPS power supply on a leased basis to be utilized during a disaster. This will allow for the continuation of services during a disaster should power be interrupted.

All call specialists receive training in working with individuals during emergency/disasters and are sensitive to individual needs and able to engage callers to determine the best options for needed services.

Interface's I&R specialists are trained on its Information and Referral Training Manual, AIRS' ABC's of I&R which is used in I&R trainings offered locally at California Alliance of Information and Referral Services (CAIRS) and Alliance of Information and Referral Systems (AIRS) annual conferences. Specialists also participate in monthly two-hour in-service trainings and are encouraged to attend related external workshops and trainings.

In addition, Interface has developed valuable partnerships with important disaster response organizations such as the departments of Emergency Service within the Counties served and working closely with UWSCC and Santa Cruz Regional 9-1-1 to develop the disaster protocols for San Benito County.

The United Way of the Bay Area will use the (AIRS) Taxonomy of Human Services to index all resource database records of Santa Cruz County as part of the regular update process. The resource database is programmed to allow for I&R Specialists to search by service type, target group and issue. All 2-1-1 centers throughout the country use these standards and the Taxonomy to ensure ease of communication and clarity everywhere 211 is in operation. UWBA was a co-founder and developer of the standards and has been using the AIRS system since its inception.

As a partner with UWBA, Interface will develop a network of contacts with San Benito County public and non-profit organizations that will facilitate the dissemination of critical disaster information to the public, agencies open and closed, roads and traffic conditions, evacuation and access routes, disaster services availability.

In addition, Interface uses a specialized information and referral software package that combines caller intake and resource database functions called iCarol. iCarol allows staff to collect all data listed in the AIRS Standards that pertain to the caller needs. In cases where an I&R Specialist deems a follow-up or further advocacy is appropriate, names, telephone numbers, and/or addresses are collected. All data are password protected and accessible to staff only. AIRS confidentiality standards apply to all calls.

In preparation for disaster events, United Way of the Bay Area has established transfer protocols with 2-1-1 centers in other Bay Area and California counties to assure that callers will receive the information they need. Thus, UWBA has established an easy to navigate 2-1-1 Bay Area website. The San Benito County resources database will be added to this website. Individuals can learn about many important aspects of 2-1-1 but also have seamless access to the resource database and 2-1-1 call specialists throughout the region.

San Benito 2-1-1 will also provide telephone and web-based services that promote and have positive public safety impact during non-emergency situations. The comprehensive, accurate and regularly updated database provides web-based and call center information about year round public safety services. The San Benito 2-1-1 database includes contact information to access many local, state, and national hotlines including poison control, suicide, child abuse, adult abuse, teen bullying/cyber bullying and other crises, domestic violence, veteran's issues, immediate shelter, food, and health needs. The database also includes local public and personal safety prevention information and programs including child car seats and installation, bicycle helmets, fingerprint ID programs, personal safety education, smoke detector installation, safe medication, immunizations, disease outbreak information, disaster preparedness kits, drug and alcohol prevention and treatment, safe driving

programs, bad weather advisories, road conditions alerts, updates on power outages, and more.

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

2-1-1 services in emergency periods are complimentary to first responder and other emergency services. 2-1-1 activities generally consist of acquiring or verifying information essential to affected residents and the public. Information developed during emergencies include, but are not limited, to the following:

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

United Way of Santa Cruz County will be positioned to provide a similar functionality to San Benito County when 2-1-1 is activated.

In the fourth section of the prescribed application, the applicant demonstrates its level of community support by including letters of endorsement from organizations and agencies that are stakeholders in the health and human services network in its community. United Way of Santa Cruz County included in its application letters of endorsement from more than twenty different organizations and agencies in a broad range of health and human service fields throughout San Benito County. These endorsements demonstrate broad community support.

In processing UWSCC's 2-1-1 application, the Communications Division considered the input of the San Benito County government because it oversees the operations of county hospitals, a county welfare department, and numerous other agencies and programs in the fields of health and human services, and is best equipped to evaluate whether an I&R provider is well suited to provide comprehensive I&R service in San Benito County. California's size and diversity, in geography, politics, and many other categories, argue against a statewide "one size fits-all" approach to evaluating and choosing comprehensive I&R providers. County governments can best apply local standards and local knowledge to this difficult but important task.

On March 12, 2013, Ray Espinosa, interim County Administrative Officer of San Benito County, sent a letter endorsing UWSCC's application to serve as the 2-1-1 provider of San Benito County residents and employees. The Commission values the input of San Benito County on this matter, and takes official notice of its action.

D.03-02-029 did not specifically address the length of time for which the Commission's grant of authority to use the 2-1-1 dialing code should be made. Utilities and other frequent participants in Commission proceedings generally know that most Commission decisions, resolutions, and actions can be later modified or rescinded if a showing of sufficient grounds to do so is made in a filing before the Commission. However, most I&R providers and county governments are not frequent participants in Commission proceedings, and may benefit from some clarification of this point. The grant of authority to use the 2-1-1 dialing code in a county or group of counties is for an indefinite term and may be revised or rescinded if a showing of sufficient grounds to do so is made

to the Commission. For the reasons cited in the previous paragraph, the Commission should consider a resolution by the San Benito County Board of Supervisors as a crucial part of any showing that the authority to use the 2-1-1 dialing code for comprehensive I&R service for San Benito County should be rescinded, reassigned, or modified. A letter to the Commission's Executive Director could serve to initiate such a process. Any such process should provide notice to all affected parties and an opportunity to be heard.

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

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

Findings

1. United Way of Santa Cruz County sent its application letter for certification as the 2-1-1 service provider for San Benito County to the Commission on May 29, 2013.
2. United Way of Santa Cruz County filed a supplemental letter to include Public Safety matters to the Commission on July 19, 2013.
3. United Way of Santa Cruz County will provide immediate public safety impact during non-emergencies, emergencies and disasters such as providing a web-based and call-in information call center addressing public safety 24 hours a day, 7 days a week and will work closely with the Office of Emergency Services to assure that the partnership of 9-1-1 and 2-1-1 is effective.

4. California Alliance of Information and Referral Services (CAIRS) submitted written comments in support of United Way of Santa Cruz County's application for provision of 2-1-1 services in San Benito County on July 29, 2013. No other comments were submitted.
5. United Way of Santa Cruz County's application provides sufficient information to meet the four major sections of the 2-1-1 application process required by D. 03-02-039.
6. Ray Espinosa, Interim County Administrative Officer, sent a letter to the Commission on March 12, 2013, endorsing United Way of Santa Cruz County's application to serve as the 2-1-1 provider for San Benito County.
7. The Communication Division of the CPUC concludes that the United Way of Santa Cruz County's application meets the requirements established by D. 03-02-029 to use the 2-1-1 dialing code.

THEREFORE, IT IS ORDERED that:

1. United Way of Santa Cruz County is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of San Benito County.
2. This authority is granted for an indefinite term, and is subject for review upon showing sufficient grounds to revise or rescind the term. Any process to contest, revise, or rescind this authority shall provide notice to all affected parties and an opportunity to be heard.
3. If United Way of Santa Cruz County cannot implement 2-1-1 dialing within a year after the Commission's approval of United Way Santa Cruz County's application for provision of 2-1-1 service in San Benito County and the needed tariffs of the telecommunications service providers ordered in Ordering Paragraphs 3, 4, and 7 of D.03-02-029, then, barring further Commission action, the certification of United Way of Santa Cruz County shall lapse so

that another Information and Referral Services provider may apply to offer service in a service territory that includes San Benito County.

4. United Way of Santa Cruz County shall notify the Director of the Communications Division in writing of the date 2-1-1 service is first rendered to the public, within five business days after service begins.

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission at its regular meeting on October 17, 2013, adopt this Resolution. The following Commissioners approved it:

PAUL CLANON
Executive Director