

**PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA**

**Communications Division  
Consumer Programs Branch**

**RESOLUTION T-17487  
August 13, 2015**

**R E S O L U T I O N**

Resolution T-17487. United Way of Merced County. Request for certification as the 2-1-1 service provider for Merced and Mariposa Counties. By Letter to Executive Director filed on May 13, 2015.

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**Summary**

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

**Background**

2-1-1 is the national abbreviated dialing code designated by the Federal Communications Commission to be used to phone non-emergency community I&R providers. Upon dialing 2-1-1, a caller will be routed to a referral service and then to an agency that can provide information concerning social services such as housing assistance, programs to assist with utility bills, food assistance and other less urgent situations not currently addressed by either 9-1-1 or 3-1-1 services. On January 23, 2002,

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

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

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

On May 13, 2015, the Commission's Executive Director received the application letter<sup>1</sup> filed by UWMC requesting certification as the 2-1-1 service provider in Merced and Mariposa Counties. On May 15, 2015, UWMC sent copies of its application letter to the R.02-01-025 service list.

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

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<sup>1</sup> 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.

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-A<sup>2</sup>, demonstrating that it will offer 2-1-1 switch translation service at a reasonable rate to I&R providers on a timetable consistent with their rollout plans.”

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

### **Notice/Protests**

UWMC confirmed that it mailed a copy of its application letter on June 10, 2015 to SBC Communications, now AT&T, as well as to the service list for R.02-01-025, which includes the appropriate incumbent local exchange carriers.

The Communications Division published notice of UWMC’s application letter in the Commission Daily Calendar on June 9 through June 15, 2015. In response to UWMC application letter, the California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated June 24, 2015, supporting the request of UWMC to use the 2-1-1 dialing code to serve Merced and Mariposa Counties. The California Cable & Telecommunications Association (CCTA) also submitted a letter on June 23, 2015, generally expressing support for the 2-1-1 I&R service. CCTA pointed out that cable operators accommodate 2-1-1 dialing in California through the routing of 2-1-1 calls in accordance with D.03-02-029, which adopted procedures and requirements that enable competitive local carriers to implement 2-1-1 call origination via an 8YY number. On June 25, 2015, in response to CCTA’s letter, the Communications Division requested via email from UWMC its plan for providing an 8YY number (charged on a per minute of usage basis). In its email dated June 25, 2015, UWMC informed the Communications Division that it has secured an 8XX number (charged on a per query basis) through AT&T Services. This number has been active since July 6, 2015 and will be available to

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<sup>2</sup> General Order 96-A has since been replaced by General Order 96-B, effective July 1, 2007.

all payphone and exchange carriers as linkage to the I&R provider. No other comments were submitted.

## **Discussion**

The first section of the prescribed application demonstrates that UWMC has the necessary organizational structure, background and experience to provide 2-1-1 service in Merced and Mariposa Counties. UWMC was incorporated and registered with the California Secretary of State in 1954 and received its 501 (c) (3) non-profit recognition in 1971. Since its inception in 1954, UWMC has provided I&R services in Merced County, serving parents, families and community members regardless of income. UWMC works with businesses, government, individuals and non-profits to help the most vulnerable and disadvantaged population become healthier, financially stable and more involved in the community.

UWMC is governed by a Board of Directors comprised of members who live or work in Merced County. Thus, the Board represents the Merced community in both expertise and experience. Funded by donations, grants and contracts, UWMC aids over 25 local organizations. The Board monitors the budget, ensures accountability, as well as reviews grants and funding recommendations. In 2013-2014, UWMC operated a \$1,608,805 budget. Annual audits are conducted and results are published on the Board of Director website to ensure transparency.

UWMC has extensive experience providing I&R and similar human services. The agency maintains a referral guide to help people locate services, and handles hundreds of telephone and in-person inquiries each year. UWMC focuses on education, financial stability, economic development and health initiatives, as well as assists community members in personal crisis. Notable I&R undertakings include the following:

- 1) In 2010, UWMC was the first fiscal sponsor of Building Healthy Communities (BHC), a program that creates connections to housing, transportation, quality health care, schools and healthy food options in poor communities to improve neighborhood conditions. A BHC component is a partner services guide that enables BHC members to refer southeastern Merced County residents to services.
- 2) In 2012, UWMC initiated Language Care, a program that provides trained healthcare interpreters to Merced County medical facilities and homecare services. The main program feature is a dedicated, 24/7/365 wireless, landline and computer accessible I&R system that connects medical personnel with interpreters.

UWMC will employ its current staff for management, program planning and referral database development. UWMC indicates that the two key managers, UWMC's Executive Director and Director of Program Development, are experienced in the planning, development and management of human service programs. Ms. Carol Bowman, UWMC Executive Director and a long-time Merced County resident, is knowledgeable in strategic planning and operations management. She previously served as the Director of Housing Management for Fresno Housing Authority. Mr. Robert Bauer, UWMC Director of Program Development, previously served as the District Research Analyst at Merced Community College and later as the Executive Director of the Merced-based non-profit Healthy House, where he worked in the areas of budget, grant writing and management, and program evaluation. He later worked as a consultant in similar data and program management areas for various Merced County organizations. Mr. Bauer currently develops and manages programs and special projects at UWMC.

UWMC will also hire new staff for the 2-1-1 service. Two new positions are the Outreach/Referral Coordinator and the Database Technician. The first will represent UWMC in connecting with outside partners, as well as develop press releases, brochures and other marketing materials. The latter will primarily manage, update and maintain the iCarol referral database that will be used for the service.

UWMC provided a three-year budget for the service for Merced and Mariposa Counties. UWMC's budget and financial statements indicate a stable and solvent financial position. It appears that UWMC has the appropriate budgetary planning procedures to support 2-1-1 service at current call volumes.

The second section of the prescribed application sets forth the required service conditions that a 2-1-1 service provider must meet. Section 2 of the UWMC 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. UWMC provides the 2-1-1 service free of charge to callers and free of commercials or advertising.

The area for the 2-1-1 service is Merced and Mariposa Counties. UWMC named the service "2-1-1 Mountain Valley" in reference to the Merced and Mariposa service region. UWMC will contract with Community Action Partnership of Kern to provide call center services in English and Spanish 24 hours a day, 7 days a week, as well as translation services in 150 languages through a subscribed interpretation service that provides translation by phone via live staff. Community Action Partnership of Kern maintains a dedicated Telecommunications Device for the Deaf (TDD) phone line, which will be used for providing 2-1-1 call center service. I&R Specialists are trained to

assist disabled callers using the teletypewriter (TTY) machine, as well as callers using California Relay Service.

In the third section of the prescribed application, the applicant must demonstrate that it understands and agrees to adhere to the standards for delivery of I&R services established by the Alliance of Information and Referral Services (AIRS). UWMC 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. UWMC'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.

2-1-1 Mountain Valley have both CAIRS and AIRS memberships. 2-1-1 Mountain Valley staff will receive training via AIRS and CAIRS conferences, staff development meetings and online instructions. The staff will also obtain AIRS certification as Certified Resource Specialist by October 1, 2015 and as Certified I&R Specialist within the first two year of 2-1-1 operations.

UWMC will use iCarol for the 2-1-1 Mountain Valley database. UWMC will use the United Way of Stanislaus database template as the foundation for the 2-1-1 Mountain Valley database. 2-1-1 Mountain Valley will ensure that a comprehensive, AIRS compliant database is developed and that it remains accurate, up-to-date and complete. One dedicated I&R Data Specialist will maintain the information in the community service database that will be used by 2-1-1 Mountain Valley and Community Action Partnership of Kern for all I&R calls. The database will be maintained according to the AIRS I&R Resource File Standards. I&R staff will conduct a comprehensive database review and update annually.

2-1-1 Mountain Valley and Community Action Partnership of Kern will ensure that they meet the AIRS standards for confidentiality. The I&R call center space is lockable, and is equipped with lockable filing cabinets and password-protected computer terminals. The client information database has several layers of security and password protection. Client records are not shared outside of the agency. All 2-1-1 Mountain Valley staff will be required to sign a confidentiality agreement upon hiring.

The 2-1-1 Mountain Valley policy that details the criteria for inclusion/exclusion in the resource database base on the AIRS standards is posted on the 2-1-1 Mountain Valley website, along with the application for database inclusion and exclusion. 2-1-1 Mountain Valley will use a standardized profile and checklist to collect data regarding all agencies and programs that qualify for inclusion in the resource database.

The 2-1-1 Mountain Valley database will use the AIRS/Info Line of Los Angeles Taxonomy of Human Services. The database will use 2-1-1 Stanislaus' AIRS/Info Line of Los Angeles Taxonomy of Human Services compliant database template as its foundation, but will be organized and maintained according to the AIRS/Info Line of Los Angeles Taxonomy of Human Services.

### **Safety Considerations**

2-1-1 Mountain Valley will provide services that promote and have an immediate positive impact on public safety during emergencies and disasters. The Merced County and Mariposa County Office of Emergency Services (OES) have endorsed the 2-1-1 Mountain Valley application. The 2-1-1 system will be integrated into each County's Emergency public Information (EPI) system, which will be available during disasters to all jurisdictions within the two counties, allowing public officials to rapidly and effectively disseminate up-to-date, critical public information related to emergency/disaster incidents, including real-time status of the disaster, evacuations, road closures, shelters, affected areas, and recovery and relief programs. 2-1-1 Mountain Valley will be an integral component of the entire emergency public information network.

2-1-1 Mountain Valley services will be available in the event of a local disaster or emergency. UWMC is contracting with call center service provider that will provide emergency back-up during disaster or emergency situations. The 2-1-1 Mountain Valley database will be stored through the secured iCarol server system. iCarol is used by many California 2-1-1 systems and has adequate redundancy to survive disasters. The local database will provide uninterrupted operability and immediate accessibility for decision makers and leaders during disasters and major emergencies.

UWMC will develop a disaster plan for 2-1-1 Mountain Valley. The disaster plan will detail the roles of each staff member, agreements with disaster service organizations and policy to ensure public accessibility to information in the event of a disaster. In addition, 2-1-1 Mountain Valley will develop and maintain a pre-disaster resource database using the iCarol database disaster module.

UWMC is engaging the Merced and Mariposa County Office of Emergency Management in the development of the 2-1-1 disaster plan. The counties have a Disaster Relief Coalition of agencies that plan community response to a possible emergency or disaster. UWMC will now represent 2-1-1 Mountain Valley in the coalition. UWMC will work with local emergency management personnel and with 2-1-1 California staff to coordinate the 2-1-1 Mountain Valley disaster plan with a regional

California 2-1-1 disaster response system. The regional system will construct a planned layer of backup and protocols for activating the statewide 2-1-1 network for disasters occurring in the Mountain Valley service region.

2-1-1 Mountain Valley will provide telephone and web-based services that promote and have positive public safety impact during non-emergency situations. Implementation of 2-1-1 Mountain Valley will be a significant enhancement to the safety of the residents of Merced and Mariposa Counties. 2-1-1 is the interface to crisis hotlines and facilitates access to other mental and social health preventive services for residents of affected counties in the event of disasters. 2-1-1 services have evolved beyond being a single, easily remember hotline number to being a source of vital safety information source during emergency periods, 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 the affected residents and the public.

During emergency or disaster situations, 2-1-1 Mountain Valley will develop and provide critical public information under the directive of the Merced County and Mariposa County OES. Information provided by 2-1-1 Mountain Valley during emergencies and disasters 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
- School closures and re-openings
- Facilitating family member contacts
- Medical and Housing Assistance
- Government Aid
- Mitigation and repairs such as sand bags, tarps, available volunteers to assist in repairs
- Emergency Alerts such as curfews, riot and looting
- Public health warnings and similar announcements

iCarol, the system used as the 2-1-1 Mountain Valley database software and server, allows I&R Specialists to track referrals given to each caller and identify gaps in service when no referrals are found to meet the caller's needs. Such data can be reported in the aggregate to assist in identifying service gaps and highlighting the greatest health and



human service needs expressed by 2-1-1 Mountain Valley callers. iCarol requires password access and has other security features to maintain confidentiality, and has a proven track record of data security. 2-1-1 Mountain Valley will maintain 24 hours a day, seven days a week data security and confidentiality to protect inquirer data.

iCarol allows I&R specialists to track referrals provided to each caller and identify gaps in services when no referrals were found to meet the caller's needs. Such data can be reported in aggregate fashion to help identify service gaps and highlight the greatest health and human service needs expressed by 2-1-1 Mountain Valley callers.

iCarol features report generation capabilities. Reports can be used for internal analysis, advocacy, community planning activities, and more. Reports will be made available free to partner organizations as needed and upon reasonable request. While protecting confidential personal information, the generated reports may include information on aggregate client demographic data, needs, unmet needs, number and type of information and assistance calls, advocacy and follow-up calls. In addition, an aggregate monthly report will be shared with local government and non-profit agency leaders to assist with community planning.

UWMC has cooperative working relationships with targeted and local I&R's operating programs throughout Merced and Mariposa Counties, such as Valley Crisis Center and Mariposa Safe Families. These agencies have been included in the local and regional 2-1-1 planning process. UWMC participates in numerous collaborative efforts to enhance service delivery and reduce gaps in the provision of child care, health and human services. When a caller needs a service that is provided by a specialized I&R, they can be referred to that agency or organization.

As a mean for evaluating program improvements on an annual basis, the 2-1-1 Mountain Valley I&R Center Data Manager will oversee daily operations and regularly monitor the I&R program to ensure it is operating according to AIRS standards. The 2-1-1 Program Manager will conduct random audits of the operation and develop a guide for monitoring and making program improvements. Findings will be used to develop a corrective action plan to implement adjustments to the process and procedures if needed. The UWMC Board of Directors will review 2-1-1 reports quarterly for information and input. In addition, the 2-1-1 Mountain Valley staff will review data analysis and meet quarterly to discuss additional reporting needs, gaps in database information, impact of 2-1-1 services on community members and outreach needs. A report will be submitted annually to the 2-1-1 Mountain Valley partners identifying outcomes and annual plans.

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. UWMC included in its application letters of endorsement from fifteen different organizations and agencies in a broad range of health and human service fields throughout Merced and Mariposa Counties. These endorsements demonstrate broad community support.

In processing UWMC's 2-1-1 application, the Communications Division considered the input of the Merced and Mariposa County governments because they oversee the operations of county hospitals, a county welfare department, and numerous other agencies and programs in the fields of health and human services, and are best equipped to evaluate whether an I&R provider is well suited to provide comprehensive I&R service in Merced and Mariposa Counties. 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 November 4, 2014, Jerald R. O'Banion, Chairman of the Merced County Board of Supervisors, expressed support of UWMC's application to serve as the 2-1-1 provider of Merced and Mariposa County residents and employees. On March 24, 2015, Merlin Jones, Chair of the Mariposa County Board of Supervisors, also indicated support of UWMC's application to provide the 2-1-1 I&R service. The Commission values the input of the Board of Supervisors of Merced and Mariposa Counties on this matter, and takes official notice of their actions.

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 Board of Supervisors of Merced and Mariposa Counties as a crucial part of any showing that the authority to use the 2-1-1 dialing code for comprehensive I&R service for Merced and Mariposa Counties should be rescinded, reassigned, or modified. A letter to the Commission's Executive Director could serve to initiate such a process. Any such process should provide notice to all affected parties and an opportunity to be heard.

The Communications Division of the CPUC concludes that the application letter filed by UWMC 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.

### **Uncontested**

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 Merced County, hereinafter referred to as UWMC, sent its application letter for certification as the 2-1-1 service provider for Merced and Mariposa Counties to the Commission on May 13, 2015.
2. UWMC will provide immediate public safety impact during non-emergencies, emergencies and disasters such as providing a web-based and call-in information call center addressing public safety 24 hours/day, 7 days/week and will work closely with the Office of Emergency Services to assure that the partnership of 9-1-1 and 2-1-1 is effective.
3. The California Alliance of Information and Referral Services, Inc. (CAIRS) submitted a letter dated June 24, 2015, supporting the request of UWMC to use the 2-1-1 dialing code to serve Merced and Mariposa Counties.
4. The California Cable & Telecommunications Association (CCTA) submitted a letter dated June 23, 2015, generally expressing support for the 2-1-1 I&R service. CCTA pointed out that cable operators accommodate 2-1-1 dialing in California through the routing of 2-1-1 calls in accordance with D.03-02-029, which adopted procedures and requirements that enable competitive local carriers to implement 2-1-1 call origination via an 8YY number.
5. In response to the Communications Division's email of June 25, 2015, UWMC indicated that it has secured an 8XX number through AT&T Services. This number has been active since July 6, 2015 and will be available to all payphone and exchange carriers as linkage to the I&R provider.

6. UWMC's application provides sufficient information to meet the four major sections of the 2-1-1 application process required by D. 03-02-039.
7. On November 4, 2014, Jerald R. O'Banion, Chairman of the Merced County Board of Supervisors, expressed support of UWMC's application to serve as the 2-1-1 provider of Merced and Mariposa County residents and employees. On March 24, 2015, Merlin Jones, Chair of the Mariposa County Board of Supervisors, also indicated support of UWMC's application to provide the 2-1-1 I&R service.
8. The Communications Division of the CPUC concludes that UWMC'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. UWMC Inc. is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral (I&R) services to all of Merced and Mariposa Counties.
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 UWMC cannot implement 2-1-1 dialing within a year after the Commission's approval of UWMC Inc.'s application for provision of 2-1-1 service in Merced and Mariposa Counties 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 UWMC Inc. shall lapse so that another I&R provider may apply to offer service in a service territory that includes Merced and Mariposa Counties.
4. UWMC 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.

Resolution T-17487  
CD/LEU

This Resolution is effective today.

I hereby certify that the California Public Utilities Commission at its regular meeting on August 13, 2015 adopted this Resolution. The following Commissioners approved it:

/s/ Timothy J. Sullivan

TIMOTHY J. SULLIVAN  
Executive Director

MICHAEL PICKER  
President  
MICHEL PETER FLORIO  
CATHERINE J.K. SANDOVAL  
CARLA J. PETERMAN  
LIANE M. RANDOLPH  
Commissioners