

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Consumer Programs Branch**

**RESOLUTION T-17679
November 7, 2019**

RESOLUTION

RESOLUTION T-17679. Grant of authority to Interface Children and Family Services to serve as the disaster 2-1-1 service provider for participating unserved counties in California.

SUMMARY

This resolution grants Interface Children and Family Services the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services during disasters to the counties of Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity. This resolution authorizes the expenditure of \$1,118,470 from the California Teleconnect Fund to implement disaster-only 2-1-1 in accordance with Senate Bill 1212 (2016). Interface Children and Family Services shall complete full implementation of disaster-only 2-1-1 service in the above listed counties in accordance with the requirements set forth by this resolution within three years of this grant of authority.

BACKGROUND

On July 31, 2000, the Federal Communications Commission (FCC) issued its *N11 Third Report and Order* assigning the 2-1-1 code as the national abbreviated dialing code for information and referral services.¹ The FCC noted that the assignment is in the public interest and recognized that the public need for social services could be met through the implementation of a 2-1-1 dialing program. The FCC encouraged the states to

¹ *Third Report and Order and Order on Reconsideration*, FCC 00-256, CC Docket 92-105, released July 31, 2000 (“*N11 Third Report and Order*”).

implement 2-1-1 programs and directed that “states will be allowed to continue to make local [N11] assignments that do not conflict with [FCC] national assignments.”²

On January 23, 2002, the California Public Utilities Commission (CPUC or Commission) instituted Rulemaking (R.) 02-0-025 to implement 2-1-1 service in the State of California. In Decision (D.) 03-02-029, the Commission adopted the regulatory policies and procedures needed to implement 2-1-1 dialing.³

On June 3, 2010, the Commission instituted R.10-06-002 to authorize disaster-only 2-1-1 service in counties that are still unserved by full-service 2-1-1. In D.11-09-016, the Commission adopted the regulatory policies and procedures needed to implement disaster-only 2-1-1 dialing.⁴

In 2016, Governor Jerry Brown signed Senate Bill (SB) 1212 into law. SB 1212 authorizes the Commission to spend \$1.5 million from the California Teleconnect Fund Administrative Committee Fund to implement disaster 2-1-1 service in unserved counties in California. This authority expires on January 1, 2023.⁵

DISCUSSION

2-1-1 in California

2-1-1 is a single, easy-to-remember telephone number used to access community information and referral (I&R) providers. Originally intended for people to call for community and social services, 2-1-1 has developed to become a source of vital safety information during emergencies. Upon dialing 2-1-1, a caller in need is routed to a call center, where a referral specialist provides the requested information and/or refers or connects the caller to the appropriate agencies that will provide the needed services, such as shelter and food assistance, evacuation routes, and other non-emergency information not provided by 9-1-1 or 3-1-1 services.

As of October 1, 2019, 39 of California’s 58 counties that comprise 97% of California’s population receive 2-1-1 service. However, 19 counties remain unserved by 2-1-1,

² *N11 Third Report and Order*, ¶¶ 21, 43.

³ See generally D.03-02-029, February 13, 2003, http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf.

⁴ See generally D.11-09-016, September 8, 2011, http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/143224.PDF.

⁵ Public Utilities Code § 280(g).

namely Alpine Amador, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Modoc, Mono, Placer, Plumas, Sierra, Siskiyou, Sutter, Trinity, Tuolumne, and Yuba (collectively, the “unserved counties”) are primarily located in rural, sparsely populated areas in northern and eastern California. This lack of access creates significant gaps in disaster response capability, preventing Californians’ access to critical information and resources during times of need.

The Commission and the State Legislature recognized the public need for 2-1-1 service in order to facilitate access to disaster preparedness, response, and recovery information. The Commission set forth rules for disaster 2-1-1 dialing in D.11-09-016 in 2011. Under the framework set forth by the Decision, the Legislature directed the Commission through SB 1212 to implement disaster 2-1-1 dialing in unserved counties and authorized the expenditure of up to \$1.5 million from the California Teleconnect Fund Administrative Committee Fund to pay for implementation costs in support of this effort.⁶

In late 2017, Staff began working cooperatively with unserved counties (then numbering 21)⁷ and 2-1-1 service providers to implement disaster 2-1-1 dialing. Over the course of the following year and a half, Staff engaged with stakeholders through conference calls, workshops, and in-person meetings to determine the needs and budgets of the unserved counties and the capabilities of service providers. Staff worked with the unserved counties to develop a framework for proposals were to be submitted by 2-1-1 service providers.

In 2019, Staff issued a request for proposals to implement disaster 2-1-1. Two entities submitted proposals: one dated March 29, 2019, from Interface Children and Family Services (Interface), which operates 2-1-1 services in Ventura County and 20 other counties,⁸ and the other dated March 28, 2019, from a consortium led by 211 Los Angeles County.⁹

⁶ Public Utilities Code § 280(g)(1).

⁷ Glenn and El Dorado subsequently established regular 2-1-1 service during this implementation process. *See* Resolutions T-17580, November 30, 2017, <https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M200/K267/200267980.PDF>, and T-17645, February 21, 2019, <http://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M270/K263/270263555.PDF>.

⁸ Interface supports 2-1-1 services by CPUC resolution or contract in Alameda, El Dorado, Fresno, Marin, Monterey, Napa, Orange, San Benito, San Francisco, San Joaquin, San Luis Obispo, San Mateo, Santa Barbara, Santa Clara, Santa Cruz, Shasta, Solano, Sonoma, Tehama, and Ventura counties.

⁹ The consortium included the 2-1-1 service providers for Alameda, Butte, Los Angeles, Nevada, Sacramento, and San Bernardino counties.

The unserved counties and Staff reviewed the proposals in accordance with D.11-09-016 and the proposal framework. In June 2019, the unserved counties selected the Interface proposal as their preferred model to implement disaster 2-1-1 service, as Interface's proposal best met their needs and matched the proposal framework. The proposal was responsive to the unserved counties' primary concern: it had lower implementation costs and charged the counties a flat annual fee after three years of service. The 211 Los Angeles County proposal had higher costs based on activation and other usage-based fees, which the unserved counties were not amenable to.

After agreeing to move forward with the Interface proposal, 12 unserved counties submitted letters of endorsement to the Commission, supporting the implementation of disaster 2-1-1 in their county and for Interface to provide that service.¹⁰ These submissions are in accordance with requirements set forth in D.11-09-016.¹¹

Interface Children and Family Services' application

Consistent with D.11-09-016 and the request for proposals, Interface's submission is organized into four sections. Interface provided the following information for each of the sections and delineated costs of implementation by year.

Section 1 – Applicant Information

Interface, located in Ventura County, has served as Ventura County's 2-1-1 service provider since 2005 and currently supports 20 other California counties in various aspects of 2-1-1 service, covering over 13 million Californians. Interface provides a broad range of I&R services and systems with live phone service in English, Spanish, Vietnamese, and Cantonese and tele-interpretation services in 147 additional languages.

Section 2 – Applicant Agreement

Interface states that it does not and will not accept fees from referred organizations in return for referrals, and that it will provide 2-1-1 service free of charge to callers with no commercial interruptions. When a county requests Interface to activate the 2-1-1 system, Interface will provide live phone and text coverage 24 hours a day, 7 days a week for

¹⁰ The unserved counties that submitted letters or resolutions of endorsement are Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity counties.

¹¹ D.11-09-016, Attachment B, Section 1(f).

each 2-1-1 call regardless of language or disability. Interface uses the Internet Protocol Teletype (TTY) system to provide TTY access for deaf and disabled callers.

Interface states that disaster, emergency, and recovery information provided by 2-1-1 agents will be updated in real time during the duration of any activation. Interface will update disaster/emergency database resources in real time during an activation and at least annually during times of no disaster or emergency. During activation, Interface will follow all applicable protocols, rules, and regulations of the Federal Emergency Management Agency and all other applicable local, county, and state emergency service protocols, rules, and regulations. Alliance of Information and Referral Systems (AIRS) service delivery standards will be met at all times. Interface also states that it will provide all disaster and recovery information to the public that is provided to it by government emergency service personnel.

During times of no disaster or emergency, the 2-1-1 number will play a recording that explains the purpose of the 2-1-1 service and that it is activated during times of disaster or emergency. Under these conditions, the 2-1-1 number shall include an option to transfer to a live 2-1-1 agent, a designated 24/7 county number to allow for a report of suspected disaster or emergency, or otherwise direct the caller to the county government for other services.

Section 3 – Technical Information and Costs

Traditionally, Interface would solely be responsible for negotiating with carriers in the participating counties to establish 2-1-1 switch translation services. Interface states that the exact switch translation costs are not specific because they vary by county and carrier and are one-time costs. The Commission notified carriers of the forthcoming request to provide these services and will subsequently be directing this process to ensure complete and proper implementation. These costs are \$5,000 per county on average, and they are recoverable through SB 1212 funds.

Interface is part of the United Way of California (UWCA) inContact business unit and proposes using the unit to provide cloud telephony services. This unit includes five California contact centers and allows for calls to be transferred between centers easily. Interface states there will be a three-year contract for cloud telephony services with Year One costs of \$1,500 per county and Years Two and Three costs of \$1,000 per year per county, which are covered by SB 1212 funds. Post-implementation costs for Years Four and Five will be \$1,000 per year per county, paid for by participating counties.

Interface proposes using iCarol as its database platform to manage 2-1-1 resources. Twenty-one California counties currently use iCarol, with Interface managing 13 of those. Interface will include new disaster and emergency resources from the participating counties in its iCarol system and will coordinate with the county project liaison to identify and gather these new resources. Interface will perform all data entry and maintenance of this database. Interface stated that there will be a three-year contract for the database platform with Year One costs of \$2,105 per county and Years Two and Three costs of \$1,000 per year per county, which are covered by SB 1212 funds. Post-implementation costs for Years Four and Five will be \$1,000 per year per county, paid for by participating counties.

Interface proposes using the United Us coordinated assistance system to track client interactions from day one of an incident disaster or emergency. The system uses a single point of entry and intake form for services and allows Interface to work collaboratively with local government emergency service providers as well as local community-based organizations to aid those affected by disaster. Interface has stated that there will be a three-year contract for the coordinated assistance system with Year One costs of \$2,105 per county and Years Two and Three costs of \$1,000 per year per county, which are covered by SB 1212 funds. Post-implementation costs for Years Four and Five will be \$1,000 per year per county, paid for by participating counties.

Interface provides 2-way texting and designs and manages text messaging campaigns using various platforms. These systems will be used in counties participating in disaster 2-1-1. Interface has stated that there will be a three-year contract for texting platforms with Year One costs of \$1,500 per county and Years Two and Three costs of \$1,000 per year per county, all covered by SB 1212 funds. Post-implementation costs for Years Four and Five will be \$1,000 per year per county, paid for by participating counties.

Interface proposes a mobile-enabled hosted website that allows the public to access available disaster/emergency/recovery resources and to search state and national databases. Information will be updated in real time and the site will allow for searches in any language supported by Google Translate, and will also incorporate a well-tested, intuitive “Guided Search” to assist users who may not know the specific term associated with the service that could best help them. The public-facing websites will be tailored by county or group of counties as agreed between the counties and Interface. Interface has stated that there will be a three-year contract for the website with Year One costs of \$1,500 per county and Years Two and Three costs of \$1,000 per year per county, which are covered by SB 1212 funds. Post-implementation costs for Years Four and Five will be \$1,000 per year per county, paid for by participating counties.

Interface states that in Year One of disaster 2-1-1 implementation, setup activities will include monthly call/webinar meetings with each county to discuss strategy and progress. Interface will host in-person training sessions to introduce county staff to the 2-1-1 systems. Interface states that training and preparedness activity costs in Year One will be \$2,105 per county, and in Years Two and Three \$1,000 per year per county, all covered by SB 1212 funds.

Interface proposes marketing and consumer education expenses to increase awareness of disaster 2-1-1 service in the currently unserved counties. This allows local agencies and residents to learn about disaster 2-1-1 dialing and its benefits before a disaster hits, maximizing the effectiveness of the 2-1-1 system. Marketing and consumer education expenses in Years One through Three will be \$2,500 per year per county.

Expenses per county for disaster 2-1-1	Setup, Year 1	Year 2	Year 3	Year 4¹²	Year 5¹²
Switch translation	\$5,000	—	—	—	—
Cloud telephony system	\$1,500	\$1,000	\$1,000	\$1,000	\$1,000
Database platform	\$2,105	\$1,000	\$1,000	\$1,000	\$1,000
Coordinated assistance system	\$2,105	\$1,000	\$1,000	\$1,000	\$1,000
Text messaging system	\$1,500	\$1,000	\$1,000	\$1,000	\$1,000
Website	\$1,500	\$1,000	\$1,000	\$1,000	\$1,000
Travel/preparedness training expenses for Interface	\$2,105	\$1,000	\$1,000	—	—
Marketing and Consumer Ed.	\$2,500	\$2,500	\$2,500	—	—
Total per county	\$18,315	\$8,500	\$8,500	\$5,000	\$5,000
Total for 12 participating counties	\$219,780	\$102,000	\$102,000	\$60,000	\$60,000

Staffing and Costs

Interface proposes creating new staff positions and augmenting existing positions to properly complete disaster 2-1-1 implementation on time. The Director will oversee the implementation team, supported by the Associate Director, in addition to their current management duties over existing 2-1-1 services. The Resource Coordinator manages the

¹² Expenses in Years Four and Five are not covered by SB 1212 funds. Counties participating in Years Four and Five of disaster 2-1-1 service will pay for these costs.

2-1-1 database, including populating the databases with information from the counties. The Project Specialist is responsible for building out the disaster 2-1-1 database, coordinated assistance, and texting systems, and is needed for only Year One of implementation. The Contact Specialists are responsible for outreach to the counties to gather the information needed for populating the databases, including disaster response, government agencies, and recovery resources, and their duties will be required for three years.

Staffing expenses for disaster 2-1-1	Salary	FTE	Year 1	Year 2	Year 3
Director	\$84,000	0.05	\$4,200	\$4,326	\$4,456
Associate Director	\$70,000	0.05	\$3,500	\$3,605	\$3,713
Resource Coordinator	\$39,520	1.00	\$39,520	\$40,706	\$41,927
Project Specialist	\$37,440	1.00	\$37,440	—	—
Contact Specialist	\$35,360	2.00	\$70,720	\$72,842	\$75,027
Total Salaries		4.10	\$155,380	\$121,479	\$125,123
Fringe benefits (23% of salaries)			\$35,737	\$27,940	\$28,778
Non-staff expenses (\$7,500/FTE)			\$30,750	\$30,750	\$30,750
Direct expenses			\$221,867	\$180,169	\$184,651
Admin expenses (15% of direct expenses)			\$33,280	\$27,025	\$27,698
Total staffing expenses			\$255,147	\$207,194	\$212,349

Interface states that fringe benefits include FICA and Medicare, health benefits, pension, and unemployment. These staffing expenses apply regardless of the number of participating counties.

El Dorado and Placer Counties

El Dorado and Placer counties are adopting solutions separate from the one approved in this resolution and are therefore precluded from eligibility for most SB 1212 funding. However, certain implementation expenses in both counties that have not yet been incurred, such as marketing and consumer education expenses, are eligible for funding. Increasing awareness of 2-1-1 in these counties will maximize the systems' effectiveness during disasters, a goal consistent with the legislative intent of SB 1212. Marketing and consumer education expenses for Years One through Three will be \$2,500 per year per county, the same allotted in Interface's proposal, paid for by SB 1212 funds.

Additionally, Placer County will incur switch translation expenses during the setup of the county's 2-1-1 system. Paying for these costs furthers the legislative intent of SB 1212 in expanding 2-1-1 service throughout California. These switch translation expenses are estimated to be \$5,000 and are recoverable through SB 1212 funds.

Expenses for El Dorado and Placer counties	Setup, Year 1	Year 2	Year 3
Marketing of 2-1-1 services in El Dorado County	\$2,500	\$2,500	\$2,500
Total for El Dorado County	\$2,500	\$2,500	\$2,500
Switch translation expenses in Placer County	\$5,000	—	—
Marketing of 2-1-1 services in Placer County	\$2,500	\$2,500	\$2,500
Total for Placer County	\$7,500	\$2,500	\$2,500
Total for both counties	\$10,000	\$5,000	\$5,000

Staff Conclusions and Recommendations

Interface's application for authority to provide disaster 2-1-1 service meets the requirements set forth in D.11-09-016: the proposal is in the public interest and will promote public safety in the participating counties. Interface is well-placed and experienced to provide disaster 2-1-1 service in the unserved counties. The total expenses for Years One to Three to complete full implementation of 2-1-1 systems in the participating counties is \$1,118,470.¹³ Staff finds these costs reasonable: the expenses are limited to necessary services, and the costs are clearly defined and not usage-based or dependent on unforeseen circumstances—all factors desired by the unserved counties. As such, Staff finds this proposal is sustainable and fulfills the legislative intent stated in SB 1212 to expand 2-1-1 service throughout California.

Accordingly, Staff recommends the Commission grant Interface's request to use the 2-1-1 dialing code to provide information and referral services in times of disaster or emergency. To administer funds appropriated by SB 1212, Staff proposes a claims process similar to the CTF claims process currently used by carriers. Interface will submit claims to the Commission's Communication Division who will review and authorize payment by the CPUC Fiscal Office for the appropriate amounts.

Terms and Conditions

¹³ This figure includes the total database and technical expenses for the twelve participating counties for Years One to Three, total staffing expenses for Interface for Years One to Three, marketing expenses for El Dorado County, and switch translation and marketing expenses for Placer County.

Interface agrees to activate disaster 2-1-1 in the counties that submitted letters and resolutions of endorsement from their boards of supervisors to the Commission, namely Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity. The counties of Amador, Modoc, Plumas, Sierra, Tuolumne, and Yuba have not chosen to participate in this solution, and they will continue to be unserved by 2-1-1.¹⁴ If these counties decide to adopt disaster 2-1-1 at a later date, they will be handled in a separate resolution under the same framework adopted in this resolution in accordance with the provisions of SB 1212.

This implementation involves the deployment of all aspects and mechanisms required for 2-1-1 to function, and Interface states that the full buildout of databases and other systems will require three years. We will therefore require Interface to complete full implementation of disaster 2-1-1 service within three years from the date of this resolution. Full implementation of disaster 2-1-1 service entails completion of the following:

- Acquisition and activation of 8YY numbers for carriers to route 2-1-1 calls;
- 2-1-1 switch translations for all carriers located in these counties;
- Identification of disaster 2-1-1 staff and/or liaisons in each county;
- Implementation and testing of all protocols and systems necessary for disaster 2-1-1 to function; and
- Training of all appropriate county staff and liaisons on the deployment and use of disaster 2-1-1.

Interface states that vendors providing for the cloud telephony, database platform, coordinated assistance, text messaging, and website systems to be employed for disaster 2-1-1 operate based on multiyear contracts, and that Interface will secure three-year contracts for services. Therefore, counties who are joining this effort agree to participate in disaster 2-1-1 for the three-year term, after which they can opt out of continued participation, and SB 1212 funds will pay for three-year contracts. For disaster 2-1-1 services in Years Four and Five, the counties and Interface have agreed to a flat fee of \$5,000 per year per county, which includes all services described.

The authority granted by this resolution is not transferable except upon Commission approval. Should Interface wish to rescind, reassign, or modify its authority to manage

¹⁴ The Sierra County Board of Supervisors submitted a letter to the Commission stating their non-participation in the solution, while the Yuba County Office of Emergency Services emailed the Commission stating the same. Amador, Modoc, Plumas, and Tuolumne counties have not responded to any Commission communications regarding endorsement of the proposed solution.

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disaster 2-1-1 dialing, it must obtain Commission approval. We are additionally requiring Interface to seek approval from the Commission via a letter to the Director of the Communications Division 30 days in advance of any change to the vendor for call center and/or database management services.

COMMENTS

In compliance with Public Utilities Code § 311(g)(1), the Commission emailed a notice letter on October 4, 2019, informing relevant parties of the availability of this resolution for public comments at the Commission's website www.cpuc.ca.gov. Comments were due within twenty (20) days of Daily Calendar notification. The notice letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website.

Comments were submitted by United Way of Fresno and Madera Counties, Community Action Coalition of Santa Barbara County, United Way Bay Area, United Way of Northern California, United Ways of California, California Cable & Telecommunications Association (CCTA), and Help Central, Inc.

Comments by the United Ways and the Community Action Coalition

The comments strongly support the approval of the resolution and the choice of Interface as disaster 2-1-1 service provider. They spoke of Interface's leadership in 2-1-1 services in California since 2005, its experience in handling numerous natural disasters, and its engagement with local governments and stakeholders.

Comments by CCTA

In its comments, CCTA broadly supports Interface's proposal for disaster 2-1-1 service. CCTA also requests the inclusion of a testing requirement of protocols necessary for disaster 2-1-1 functioning.

Comments by Help Central, Inc.

In its comments, Help Central, Inc., the 2-1-1 service provider for Butte and Glenn counties, opposes the draft resolution on the grounds that the resolution does not cover all 19 currently unserved counties. It does not object to the designation or qualifications of Interface as the disaster 2-1-1 service provider, but urges the inclusion of all counties regardless of their willingness to participate.

Comments by 211 California

In its comments, 211 California opposes the draft resolution on the grounds that the solution relies on a single 2-1-1 service center located in Ventura County, leaving it

vulnerable to outages if the facility is taken out of service by disaster, Public Safety Power Shutoff event, or other incidents. 211 California also objects on the grounds that it does not cover all 19 currently unserved counties. It urges a “least regrets” approach that activates the switches in all 19 counties while deferring the design and implementation of a statewide disaster 2-1-1 system to 211 California and the California’s Office of Emergency Services.

Staff Responses to Comments

Staff acknowledges the comments supporting the approval of the resolution and agrees with CCTA’s comment regarding the inclusion of a testing component. Therefore, the requirement has been included as a part of full implementation of disaster 2-1-1 services.

Staff disagrees with Help Central’s and 211 California’s comments regarding the activation of 2-1-1 dialing in counties that have not agreed to participate in disaster 2-1-1 service. D.11-09-016 requires a county’s board of supervisors to endorse a disaster 2-1-1 solution before it may be implemented in that county.¹⁵ The Commission also has no authority to impose disaster 2-1-1 services on counties that have not agreed to such services. However, the Commission does have authority to spend SB 1212 funds to help close 2-1-1 service gaps as it deems appropriate consistent with the provisions of D.11-09-016.¹⁶ Activating switches for 2-1-1 service without an embedded local liaison in nonconsenting counties, who are often stationed in county governments, offices of emergency services, and local communities, will result in woefully and unconscionably lacking information about those areas during times of disaster. Activating 2-1-1 service without the requisite information or the ability to obtain information to make 2-1-1 dialing useful would be dangerous and a grave disservice to the California public who would be persuaded to use 2-1-1 service but be unable to obtain any useful information before they even leave home. Therefore, the resolution was not modified to include all counties regardless of their consent.

Staff also disagrees with 211 California’s comments regarding reliance on a single facility and preparations for power disruptions. Interface’s call center has several levels

¹⁵ D.11-09-016, Attachment B, Section 1(f).

¹⁶ Public Utilities Code § 280(g)(1) (“*Consistent with Decision 11-09-016 . . . , if it determines that doing so is an appropriate use of funds collected from ratepayers*, the commission may expend up to one million five hundred thousand dollars (\$1,500,000) from the California Teleconnect Fund Administrative Committee Fund for one-time costs to *help close 2-1-1 service gaps* in counties lacking access to disaster preparedness, response, and recovery information and referral services, where technically feasible, through available 2-1-1 service.”) (emphasis added).

of redundancy in a power shutoff situation, including a natural gas generator with auto failover and a third layer of onsite propane backup should even the natural gas supply be disrupted. The call center also has short-term battery backups and multiple local backup locations in geographically separated locations in Ventura County, which have been tested and used in the past. Finally, Interface is part of the inContact business unit, which enables the seamless transfer of call volumes between multiple 2-1-1 call centers in California. Interface initiated this solution several years ago to forestall the disruptions that 211 California describes and has not had to use it given the strength of its redundancy capabilities. Given the sufficiency of these measures, the resolution was not modified to defer design and implementation to 211 California when the counties have already agreed to adopt Interface's system.

FINDINGS

1. 2-1-1 is the telephone number used to access community information and referral (I&R) providers and vital safety information during emergencies.
2. The counties of Alpine, Amador, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Modoc, Mono, Placer, Plumas, Sierra, Siskiyou, Sutter, Trinity, Tuolumne, and Yuba currently do not have any 2-1-1 service.
3. Senate Bill (SB) 1212, signed into law by Governor Jerry Brown on September 29, 2016, authorizes the California Public Utilities Commission (CPUC or Commission) to spend up to \$1.5 million to implement disaster 2-1-1 services in counties without service.
4. In response, the CPUC Communications Division (CD) began working cooperatively with the 19 unserved counties and existing 2-1-1 service providers to implement disaster 2-1-1 dialing and developed a framework under which proposals were to be submitted.
5. The CD issued a request for proposals for disaster 2-1-1 implementation on January 30, 2019.
6. In March 2019, Interface Family and Children Services (Interface) and 211 Los Angeles County submitted proposals in response to the January 2019 request.
7. In June 2019, the unserved counties and the CD selected Interface to implement disaster 2-1-1 dialing in their areas.
8. The boards of supervisors of the counties of Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity have provided

letters and resolutions endorsing disaster 2-1-1 implementation and the Interface proposal in accordance with Decision 11-09-016.

9. Interface's proposal meets the requirements set forth in Decision 11-09-016.
10. Granting the authority to provide disaster 2-1-1 service to Interface is in the public interest as it will promote public safety in the participating counties, and Interface is well-placed and experienced to provide these services in the unserved counties.
11. Interface should be granted authority to provide disaster 2-1-1 service in the counties of Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity.
12. Interface should provide disaster 2-1-1 service in these counties for at least three years.
13. Spending SB 1212 funds on marketing and consumer education expenses in El Dorado and Placer counties will maximize the effectiveness of their 2-1-1 systems during disaster.
14. Spending SB 1212 funds on switch translation expenses in Placer County furthers the legislative intent of increasing 2-1-1 adoption.
15. The counties agree to participate in the disaster 2-1-1 solution for at least three years, after which the counties will incur a flat fee of \$5,000 per year per county to Interface, which will continue all services described.
16. The Commission should authorize the amount of \$1,118,470 to implement 2-1-1 dialing for disasters in unserved counties including El Dorado and Placer counties.
17. Full implementation of disaster 2-1-1 service entails completion of the following:
 - Acquisition and activation of 8YY numbers for carriers to route 2-1-1 calls;
 - 2-1-1 switch translations for all carriers located in these counties;
 - Identification of disaster 2-1-1 staff and/or liaisons in each county;
 - Implementation and testing of all protocols and systems necessary for disaster 2-1-1 to function; and
 - Training of all appropriate county staff and liaisons on the deployment and use of disaster 2-1-1.
18. The authority granted to Interface to provide disaster 2-1-1 service should not be transferrable except upon Commission approval.
19. Interface should be required to seek approval from the Commission via a letter to the Director of the Communications Division 30 days in advance of any change to the vendor for call center and/or database management services.

THEREFORE, IT IS ORDERED that:

1. Interface Children and Family Services is granted authority to use the 2-1-1 abbreviated dialing code to provide information and referral services during disasters and emergencies in the counties of Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity.
2. Interface Children and Family Services shall complete implementation of disaster 2-1-1 service in accordance with the procedures outlined in California Public Utilities Commission Decision 11-09-016 within three years of the date of this Resolution. Full implementation of disaster 2-1-1 service shall entail completion of the following:
 - Acquisition and activation of 8YY numbers for carriers to route 2-1-1 calls;
 - 2-1-1 switch translations for all carriers located in these counties;
 - Identification of disaster 2-1-1 staff and/or liaisons in each county;
 - Implementation and testing of all protocols and systems necessary for disaster 2-1-1 to function; and
 - Training of all appropriate county staff and liaisons on the deployment and use of disaster 2-1-1.
3. The Communications Division is authorized to expend up to \$1,098,470 from the California Teleconnect Fund for implementation of disaster 2-1-1 service in unserved counties by Interface Children and Family Services through January 1, 2023.
4. The Communications Division is authorized to expend up to \$7,500 from the California Teleconnect Fund for marketing and consumer education expenses in El Dorado County to increase awareness of its new 2-1-1 service during disaster.
5. Upon the Commission's adoption of a resolution authorizing the use of the 2-1-1 dialing code in Placer County, the Communications Division is authorized to expend up to \$12,500 from the California Teleconnect Fund for switch translation and marketing and consumer education expenses in Placer County to increase awareness of its new 2-1-1 service during disaster.
6. Interface Children and Family Services shall notify the Director of the Communications Division in writing of the date disaster 2-1-1 service is first rendered to the public, within five business days after service begins.

7. Interface Children and Family Services shall not transfer the authority granted except upon Commission approval.
8. Interface Children and Family Services shall seek approval from the Commission by advice letter to the Director of the Communications Division 30 days in advance of any change to the vendor for call center and/or database management services.

This resolution is effective today.

I certify that the foregoing resolution was duly introduced, passed, and adopted at a conference of the Public Utilities Commission of the State of California held on November 7, 2019, the following Commissioners voting favorable thereon:

/s/ ALICE STEBBINS

Alice Stebbins
Executive Director

MARYBEL BATJER
President
LIANE M. RANDOLPH
MARTHA GUZMAN ACEVES
CLIFFORD RECHTSCHAFFEN
GENEVIEVE SHIROMA
Commissioners