

PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

**Communications Division
Broadband, Video and Market Branch**

**RESOLUTION T-17683
February 27, 2020**

RESOLUTION

Resolution T-17683: Approves \$539,247 from the California Advanced Services Fund (CASF) for the Broadband Adoption grant application of iFoster for the “Digital Literacy Training for Foster Youth” project.

SUMMARY

This Resolution approves grant funding in the amount of \$539,247 from the California Advanced Services Fund (CASF) Broadband Adoption Account (Adoption Account) for iFoster’s “Digital Literacy Training for Foster Youth” project (iFoster project). This project will provide digital literacy training to 12,500 transition-age foster youth¹ and synergizes with the LifeLine iFoster pilot (iFoster pilot).

BACKGROUND

On October 15, 2017, Governor Brown signed Assembly Bill (AB) 1665 (Garcia) into law. This legislation amended the statutes governing the CASF program, Public Utilities Code, §§ 281, 912.2, and 914.7, and added the Broadband Adoption Account, which provides grants to increase publicly available or after school broadband access and digital inclusion. Eligible applicants include local governments, senior centers, schools, public libraries, non-profit organizations, and community-based organizations with programs to increase publicly available or after-school broadband access and digital inclusion.

Projects eligible for grant funding include digital literacy projects and broadband access projects. Digital literacy projects include digital literacy training programs and public education to communities with limited broadband internet adoption. Broadband access projects include those that offer free broadband internet access in community training

¹ Transition age youth are young people between the ages of sixteen and twenty-six (as defined by iFoster) who are in transition from state custody or foster care and are at-risk. Once they turn 18 they can no longer receive assistance from the systems of care that previously provided for many of their needs.

rooms or other public spaces. It can also include projects that perform community outreach and education on internet service plans to the community, and call centers that increase broadband access and adoption to the internet.

On June 21, 2018, the Commission issued Decision (D). 18-06-032 which implemented provisions of AB 1665 and adopted rules and guidelines for the Adoption Account.² On February 21, 2019, the Commission issued D.19-02-008 modifying and clarifying the rules and guidelines (Adoption Account Guidelines).³ These guidelines describe the eligibility and application requirements, types of activities and costs to be funded by CASF, and criteria for staff level expedited review and approval. Thirteen criteria must be met in order to qualify for staff level expedited review. Please see Attachment A for the full list of expedited review criteria.

The iFoster project, considered through this Resolution, does not qualify for expedited review because the grant request exceeds \$100,000 and iFoster did not designate a place for digital literacy training.

A. Lifeline Pilot

On April 25, 2019, the Commission issued D.19-04-021⁴ which authorizes two pilot programs within the California LifeLine Program (LifeLine): 1) Boost Mobile; and 2) the iFoster pilot. The iFoster pilot will provide foster youth with a smartphone, monthly prepaid cell phone and technical support services from Boost Mobile free of charge. iFoster will determine eligibility based on the youth's foster care status, on whether or not the foster youth is approved by child welfare services (CWS) to have cell phone service, by California residency and if the foster youth is in the qualifying age-range (determined by CWS).

iFoster will work with CWS to identify all potentially eligible foster youth participants. The iFoster pilot was launched on November 22, 2019 and is expected to run for two years. The estimated iFoster pilot cost is approximately \$22.3 million if each of the potential 33,000 foster youth join for a duration of two years.⁵

² *Decision Implementing the California Advanced Services Fund Broadband Adoption, Public Housing and Loan Accounts* [D.18-06-032] (2018).

³ *Decision Revising the California Advanced Services Fund Broadband Adoption Account Provisions* [D.19-02-008] (2019), Appendix 1.

⁴ *Decision Authorizing Pilot Programs of Boost Mobile, Inc. and iFoster, Inc. in the California LifeLine Program* [D.19-04-013] (2019)

⁵ Participation in the iFoster pilot will be constrained by the extent of Boost Mobile's cell service coverage. Boost Mobile is a mobile virtual network operator which resells Sprint service. Sprint's network is best in heavily populated regions such as the Los Angeles metropolitan area.

B. Project Submission

On March 1, 2019, iFoster submitted an Adoption Account application, requesting \$524,408 to fund digital literacy training to transition-age foster youth who will receive a device through the iFoster pilot.

iFoster withdrew their application on July 23, 2019, stating that the LifeLine pilot had been delayed.

iFoster resubmitted a modified application on September 26, 2019, requesting \$554,394 in CASF funding. In its application, iFoster stated that modifications better align the application with the iFoster pilot.⁶

C. Applicant

iFoster is a 501(c)(3) national non-profit community-based organization (CBO) headquartered in Truckee, CA. Its core mission is to bridge the gap between youth in the child welfare system and the external corporations, foundations and government agencies who have the resources which may be beneficial to them.⁷ As a non-profit CBO offering digital inclusion services, iFoster is an eligible applicant for Adoption Account funds.⁸

iFoster has had previous experience with digital inclusion projects. iFoster successfully ran a four-year laptop distribution program for foster youth from 2012 through 2016, providing 4,603 computers and 960 broadband connections to foster youth in California. In a recently completed program, iFoster distributed over 1,100 laptops to eligible foster youth in rural California. Additionally, iFoster delivers services through an online portal,⁹ such as a jobs program and the provision of secure online storage of personal documents for foster youth.

⁶ Given that the iFoster pilot is the driver for participation in the proposed digital literacy project and that the application was initially submitted on March 1, this application will be considered as part of the March 1, 2019 submission and not as a new application.

⁷ iFoster leverages a technology platform in order to aggregate resources online through the iFoster Resource Portal and make these resources accessible to foster children and youth, to their caregivers and to child welfare departments and agencies. iFoster has partnered with large variety of business partners such as Microsoft, AT&T, Starbucks, Costco and others as well as government agencies.

⁸ D.19-02-008, Appendix 1, page 3, Section 1.5.

⁹ <https://portal.ifoster.org/>

DISCUSSION

In compliance with D.19-02-008, Staff determined the iFoster project is eligible for CASF Adoption Account funding.

Details of Staff analysis are explained in the following sections:

- I. Project Description and Eligibility
- II. Funding Determination
- III. Staff Recommendation
- IV. Compliance Requirements
- V. Payment to CASF Recipients

I. Project Description and Eligibility

The iFoster project synergizes with the iFoster pilot. The project targets 11,000 foster youth currently in foster care, ages 16 to 20, and 12,000 former foster youth, ages 21 through 26. iFoster projects that 12,500 of these youth will participate (7,500 of current foster youth and 5,000 former foster youth). Digital literacy training may be mandatory for eligible youth currently in foster care; whether the training is mandatory is determined by county CWS. Digital literacy training will not be mandatory for eligible foster youth no longer in foster care. This training is not required by the iFoster pilot.

Digital literacy training will be provided in an online format and testing will be required after each module. iFoster's application did not designate a space for digital literacy training. iFoster determined that it was not possible for all eligible youth to attend group trainings due to their schedules, the locations of the placements, and the burden on caregivers and social workers to provide transportation. iFoster stated that there are no requirements or mandates in child welfare to bring together foster youth for any events, meetings, or trainings.

A minimum of eight hours of training will be provided for all participating youth. Three different training delivery options were identified for delivering online content: 1) in-person group workshop; 2) in-person individual training with a facilitator; and 3) self-directed training by youth themselves.

Curriculum is based on the needs of foster youth and will be finalized and implemented upon project approval.

The iFoster project is an eligible project as defined in D.19-02-008. The iFoster project targets a community with low broadband adoption.¹⁰

Public Utilities Code section 281(j)(5) requires the Commission to give preference to programs in communities with demonstrated low broadband access, including low-income communities, senior communities, and communities facing socioeconomic barriers to broadband adoption.¹¹ The Adoption Account Guidelines includes a preference checklist to assist the Commission in the evaluation and prioritization of applications (See Appendix B for preference criteria checklist). The iFoster project meets most items on the preference checklist.¹²

II. Funding Determination

Staff reviewed iFoster's budget as presented in the application to ensure that no more than 85 percent of eligible program costs were included. Further, the budget cap was applied per individual line item as well as to the overall budget.^{13,14} Staff then adjusted the final budget by removing any ineligible expenses. Specifically, iFoster requested \$554,394, inclusive of \$8,750 for laptop raffles during outreach activities. Raffles, even during outreach events, are not considered an allowable expense. Therefore, staff removed this from the proposed budget. Staff further reduced budget line items by 15 percent when applicable.¹⁵ The submitted budget was reduced by \$15,147, resulting in an approved budget of \$539,247.

III. Staff Recommendation

The iFoster project meets the needs of the community by providing digital literacy training to at-risk transition-age foster youth who will be receiving a device through the iFoster pilot. These individuals include foster youth that have transitioned or will transition out from foster-care to independent living and are at-risk as research has shown that they generally experience poorer outcomes than their peers in their transition into adulthood. Some part of these outcomes can be traced to the digital divide, as foster youth have been shown to lack access to a computing device and the

¹⁰ D.19-02-008, Appendix 1, pp. 3-4; see also D.19-04-013, p. 37, for information regarding foster youth and broadband adoption.

¹¹ Pub. Util. Code, § 281 (j)(5).

¹² The project does not serve a community with a high percentage of residents with limited English proficiency.

¹³ D.19-02-008 Appendix 1, Section 1.6, states the Commission may fund up to 85 percent of eligible program costs. See also D.19-02-008 footnote 17.

¹⁴ The overall budget, inclusive of moneys from the iFoster pilot for devices, is \$1,257,394.

¹⁵ This is to help ensure that no more than 85 percent of eligible program costs were included.

Internet. The iFoster pilot will address the issue of broadband access and the iFoster project will help foster youth make best use of this resource. Therefore, staff recommends CASF funding in the amount of \$539,247 with a goal to provide digital literacy and digital safety training to up to 12,500 foster youth, at a cost of \$44.36 per youth trained.

IV. Compliance Requirements

iFoster is required to comply with all the guidelines, requirements, and conditions associated with the grant of CASF funds as specified in D.19-02-008. Such compliance includes, but is not limited to the following:

A. Execution and Performance

iFoster must start the project within six months after the grant approval (after the ramp up time) and complete the project within a 24-month time frame or earlier. The Commission may withhold or terminate grant payments if iFoster does not comply with any of the requirements set forth in its application and compliance with CASF rules. In the event iFoster fails to complete the project in accordance with the terms of approval granted by the Commission, iFoster will be required to reimburse some or all the CASF funds it has received.

Upon adoption of this Resolution, iFoster will receive an award acceptance letter and consent form requiring agreement to the terms set herein. A completed and executed consent form must be emailed to CASF_Adoption@cpuc.ca.gov within 30 calendar days from the date of the adoption of this Resolution. Failure to submit the consent form within 30 calendar days from the date of this Resolution's adoption will deem the grant null and void.

Material changes in the entries shown in the application, such as discontinuing operation or bankruptcy, or change of name (including DBA), change of address, telephone, fax number or E-mail address must be reported immediately by a letter to the Commission Director of the Communications Division, 505 Van Ness Avenue, San Francisco, CA 94102.

B. Project Audit and Reporting Requirements

See Appendix D.

V. Payments to CASF Recipients

The Commission may reimburse iFoster's expenses in accordance with, and within the time specified in California Government Code § 927 et seq. Details are in Appendix E.

COMMENTS ON DRAFT RESOLUTION

In compliance with Public Utilities Code, §311(g), a notice letter was emailed on January 22, 2020, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution for public comments at the Commission's documents website at <http://www.cpuc.ca.gov/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website. The Commission received no public comments.

FINDINGS

1. On March 1, 2019 iFoster submitted an application for its digital literacy project "Digital Literacy Training for Foster Youth" to the CASF broadband adoption account program.
2. iFoster withdrew their application on July 23, 2019, stating that the LifeLine pilot had been delayed and resubmitted their modified application on September 26, 2019 with a funding request of \$554,394.
3. iFoster's application did not meet the expedited review criteria because the grant request exceeds \$100,000 and the application did not identify a designated place for digital literacy training.
4. Based on its review, staff has determined that this project meets the eligibility requirements and aligns with CASF's goal to increase publicly available or after-school broadband access and digital inclusion to serve communities with limited broadband adoption and therefore recommends Commission approval of CASF funding for the iFoster project.
5. Staff reduced the requested budget consistent with requirements stated in D.19-02-008 as described in Section II.
6. A notice letter was emailed on January 22, 2020, informing all parties on the CASF Distribution List of the availability of the draft of this Resolution for public comments at the Commission's documents website at

<http://www.cpuc.ca.gov/documents/>. This letter also informed parties that the final conformed Resolution adopted by the Commission will be posted and available at the same website. The Commission received no public comments.

THEREFORE, IT IS ORDERED that:

1. The Commission shall award \$539,247 to iFoster for its digital literacy project "Digital Literacy Training for Foster Youth." The award shall be paid out of the CASF Broadband Adoption Account in accordance with the guidelines adopted in D.19-02-008.
2. iFoster shall comply with all guidelines, requirements and, conditions associated with a CASF award, as specified in D.19-02-008, and this Resolution.
3. iFoster must complete all work and achieve all performance metrics identified in Attachment C of this Resolution and workplans submitted with its application.
4. iFoster must complete and execute the consent form (to be sent to iFoster after this Resolution is adopted) agreeing to the conditions set forth in this Resolution. A completed and executed consent form shall be emailed to CASF_Adoption@cpuc.ca.gov within 30 calendar days from the date of the adoption of this Resolution. Failure of iFoster to submit the consent form within 30 calendar days from the date of the adoption of this Resolution will deem the grant null and void.
5. By receiving a CASF grant, iFoster agrees to comply with the terms, conditions and requirements of the grant and thus submits to the jurisdiction of the Commission with regard to disbursement and administration of the grant.
6. iFoster must maintain files, invoices, and other related documentation for three years after final payment. iFoster shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after iFoster incurred the expense being audited.
7. If iFoster fails to complete the project in accordance with the terms outlined in D.19-02-008 and this Resolution, they must reimburse some or all the CASF funds it has received.

Resolution T-17683
CD/WG1

This Resolution is effective today.

I hereby certify that this Resolution was adopted by the Public Utilities Commission at its regular meeting on February 27, 2020. The following Commissioners approved it:

/s/ ALICE STEBBINS

Alice Stebbins
Executive Director

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

ATTACHMENT A

Expedited Review Criteria

The Commission assigns to staff the task of approving applications that meet all the following expedited review criteria:

1. Applicant is proposing to serve a low-income population;
2. Applicant is a local government, senior center, school, public library, non-profit organization, or community-based organization with programs to increase publicly available or after-school broadband access and digital inclusion, such as digital literacy training programs;
3. Applicant requests a grant of \$100,000 or less;
4. Applicant agrees to perform education and outreach to educate the community of available broadband Internet services;
5. Applicant's requested reimbursement for computing devices for community training rooms or other public space, is no more than \$750 per device, with a maximum of 15 devices per location;
6. Project provides device technical support responses within 24 hours;
7. Device technical support (not network), either by phone or in person, will be able to respond within 24 hours. Refurbished devices will have at least a six-month warranty. New devices will have at least a 30-day warranty;
8. Applicant has identified a designated space for digital literacy training or broadband access;
9. Applicants must be ready to provide classes within six months of being selected for a CASF grant and must submit a work plan with major milestones showing how they propose to meet this deadline; and
10. Applicants must complete the adoption project within 24 months from the ramp up period, or earlier if work plan milestones/deliverables have been accomplished.

Additional Criteria for Digital Literacy Projects only

11. Applicant or partner organization possesses at least one-year experience in digital literacy training or has previously carried out at least one digital literacy project;
12. Applicant must provide at least eight hours of digital literacy training to each participant, through digital literacy classes, one on one tutoring or self-paced instruction; and
13. Applicant's requested reimbursement for take-home computing devices is no more than \$150 per device, limited to one computing device per eligible household, and no more than \$10,000 per application/project location.

ATTACHMENT B

Preference Checklist

1. Project is serving a low-income community (where the community has a median household income at or below the CARE income limits for a household of four).
2. Project is serving a community with a high percentage of residents with limited English proficiency (where more than 50 percent of residents have limited English proficiency).
3. Project is serving a community with a high percentage of residents with limited educational attainment (where more than 50 percent of residents have only a high school diploma or less).
4. Project is serving a rural community. A project is located in a "rural" area if it meets one of the following criteria:
 - a. It is in area that is eligible for federal program under the United States Department of Agriculture (USDA) Section 515 program;
 - b. It is in a city with a population of 40,000 or less or in a non-urbanized area; or
 - c. It is in an unincorporated area of a county and is not in an urbanized area.
5. Project has community support, endorsements and/or partnerships.
6. Project is serving a community with some other demonstrated disadvantage which affects broadband adoption, documented by applicant.
7. Project considers coordination with other public purpose programs and funding sources.

APPENDIX C
Approved Project Budget and Performance Metrics

iFoster
10049 Martis Valley Road, Unit C, Truckee CA

iFoster - “Digital Literacy Training for Foster Youth” Budget	
Category	Grant Amount
<i>In-Classroom Computing Devices</i>	\$0
<i>Take Home Computing Devices</i>	\$0
<i>General Program Implementation</i>	\$539,247
Total	\$539,247

iFoster - “Digital Literacy Training for Foster Youth”	
Performance & Goals	Metric
<i>Grantee will perform the following education and outreach to educate the community of available broadband internet services</i>	<i>Activities as stated per Application</i>
Grantee will provide digital literacy training to the following	12,500 foster youth eligible for the iFoster pilot
Grantee shall enroll the following number of households to broadband internet services	Broadband subscriptions to be provided through the iFoster pilot (LifeLine)

APPENDIX D

Reporting and Payment Requirements

Project Audit

iFoster must maintain files, invoices, and other related documentation for three years after final payment. iFoster shall make these records available to the Commission upon request and agree that these records are subject to audit and review by the Commission at any time within three years after iFoster incurred the expense being audited.

Project Reporting Requirements

The grant award is contingent upon fulfilling reporting requirements during and after project completion as specified in D.19-02-008, Appendix 1, Section 1.14.

A template for all necessary reports is provided in the CASF Adoption Program Administrative Manual, which is posted on the Commission's Adoption Account website. Up to three reports will be required throughout the course of the project:

i. Ramp-up period report

A "ramp-up period report" is required after completion of the ramp up activities and when deployment is set to begin (if applicable). This report must be submitted by no later than 3 months after the completion of the ramp up activities. In this report, recipients will report on the completion of the ramp up activities per the work plan, milestones met, as well as request payment for relevant expenses to date. The ramp up period may not exceed 6 months from the time the application is approved.

ii. Year 1 Progress Report

The Year 1 progress report is required at the end of the first year of deployment. This report must be submitted by no later than 3 months after the end of the first year of deployment. In this report, recipients will report on the status of Year 1 milestones per the work plan, as well as request payment for relevant expenses to date.

iii. Year 2 Completion Report

The Year 2 completion report is required at the end of the 24-month period, or after the work plan milestones/deliverables have been accomplished if earlier than the 24-month period. This report must be submitted by no later than 3 months after completion of the project. In this report, recipients will report on the completion of the overall project, milestones met per the work plan, as well as request payment for final and remaining relevant expenses.

All required reports must be submitted via email to: CASF_Adoption@cpuc.ca.gov. iFoster must certify that each report submitted is true and correct under penalty of perjury.

APPENDIX E

Payments to CASF Recipients

- iFoster may submit payment requests at 3 points throughout the project period. Payment requests will accompany the 3 reports required above (Ramp Up Period, Year 1, Year 2).
- The relevant project report must be submitted in order for a payment request to be granted.
- Payment request for the ramp-up period may not exceed 25% of grant amount.
- All payments requests require documentation of outcome in “milestone” report.
- iFoster shall submit final requests for payment no later than 3 months after completion of the project.
- Payment will be based upon receipt and approval of invoices and other supporting documents showing the expenditures incurred for the project are in accordance with their approved application and budget.
- iFoster must notify the Commission as soon as it become aware that they may not be able to meet project deadlines.
- Payment will be made in accordance with, and within the time specified in California Government Code § 927 et seq.
- The Commission has the right to conduct any necessary audit, verification, and discovery during project implementation to ensure that CASF funds are spent in accordance with the terms of approval granted by the Commission.
- The iFoster’s invoices will be subject to audit by the Commission at any time within three years of final payment.

iFoster must certify that each report and payment request submitted is true and correct under penalty of perjury. All required reports and payment requests, including invoices and other supporting documents should be submitted via email to:

CASF_Adoption@cpuc.ca.gov.