PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division Consumer Programs Branch RESOLUTION T-17686 March 26, 2020

<u>RESOLUTION</u>

Resolution T-17686. Placer County request for authority to serve as the 2-1-1 service provider for Placer County in accordance with Decision 03-02-029.

SUMMARY

This resolution grants the governing body of the County of Placer (Placer County)¹ the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to all of Placer County. This grant of authority is in the public interest and will promote the public safety of Placer County, and conforms to the Federal Communications Commission delegation of authority to the states to implement 2-1-1 dialing.

BACKGROUND

2-1-1 is the telephone number used to access non-emergency community information and referral (I&R) providers. Upon dialing 2-1-1, a caller in need is routed to a call center, where a referral specialist will refer or connect the caller to the appropriate agencies that will provide the needed social services, such as housing assistance, programs to assist with utility bills, food assistance, elderly or child care, and many other non-emergency information not currently addressed by either 9-1-1 or 3-1-1 services.

¹ In this Resolution, "Placer County" refers to both the county in California and its government.

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.² 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 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."³

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.⁴

On October 15, 2019, the Commission's Executive Director received via postal mail the application letter (application)⁵ submitted by Placer County, requesting certification as the 2-1-1 service provider in Placer County. Placer County also sent a copy of its application via email 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 (CD or staff) published notice of Placer County's application in the Commission Daily Calendar from October 15, 2019, through October 21, 2019. The Commission received no comments in response to the notice.

DISCUSSION

County of Placer's Application

The application for 2-1-1 service is organized into four sections. Placer County provided information for each of the four sections as discussed below.

² Third Report and Order and Order on Reconsideration, FCC 00-256, CC Docket 92-105, released July 31, 2000 ("N11 Third Report and Order").

³*N11 Third Report and Order*, ¶¶ 21, 43.

⁴ See generally D.03-02-029, February 13, 2003, <u>http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf</u>.

⁵ 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.

Section 1 – Organizational Structure, Background, and Experience

Placer County currently does not have 2-1-1 service. Placer County is a county government in the State of California.⁶ Placer County is located in east-central California, stretching from the northern Sacramento suburbs through Gold Country to Lake Tahoe.⁵ The California Department of Forestry and Fire Protection's (Cal Fire) fire hazard severity zones maps show large areas of Placer County are in moderate, high, or very high fire hazard zones.⁷

Placer County submitted the application, along with supporting documentation, which includes an audited financial statement and a proposed three-year budget that demonstrate that Placer County is a solvent entity with the appropriate budgetary planning to support 2-1-1. The Director of the Health and Human Services Department will lead the implementation of Placer County's 2-1-1 service (2-1-1 Placer). Placer County is experienced in providing I&R and currently offers I&R services through many of its departments, such as the Placer County Network of Care, which provides information about health, mental wellness, services for children, news, and a community calendar.

Placer County has contracted with Nevada Sierra Connecting Point Public Authority (Connecting Point) for 2-1-1 call center and database management services. Connecting Point, located in Grass Valley, California, also serves as the 2-1-1 service provider for Nevada County since 2005. Connecting Point also provides homeless coordinated entry services for Placer County, including shelter referrals and vulnerability assessments.

Section 2 – Terms and Conditions of Service

Placer County 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. Connecting Point will answer each 2-1-1 call with live help 24 hours a day, 7 days a week, regardless of language or disability. Connecting Point is staffed with bilingual 2-1-1 personnel speaking English and Spanish. Translation services via Language Line Services are available to provide live

⁶ Placer County was created by the California State Legislature in April 1851. <u>https://www.placer.ca.gov/2763/About-Our-County</u>.

⁷ Cal Fire Placer County Fire Hazard Severity Zone Map, <u>https://osfm.fire.ca.gov/media/6742/fhszs_map31.pdf</u>.

phone translation in over 240 languages. Connecting Point uses the Internet Protocol Teletype (IPTTY) system to provide TTY access for deaf and disabled callers.

Section 3 – Alliance of Information and Referral Services Standards

Placer County's application describes the following 2-1-1 policies that conform to the professional standards established by the Alliance of Information and Referral Services (AIRS)⁸ for the delivery of I&R and 2-1-1 services:

- Maintain internal protocols ensuring callers are assessed and referred to the needed resources, including a threat assessment protocol directing I&R staff to transfer callers in crisis directly to 9-1-1 or the local crisis or suicide prevention hotline.
- Update resource database annually to ensure it is comprehensive, accurate, and up-to-date with local, state and national services.
- Secure call center space with locked entrance, store client files in a passwordprotected company server accessible only to authorized I&R personnel, train employees on client privacy protocols, and restrict database access to personnel by job function to ensure client confidentiality.
- Collect data on 2-1-1 calls received, referrals made and/or lack of available referrals, aggregate data, and produce reports for internal analysis and community planning.
- Maintain disaster plans and a pre-disaster resource database containing ongoing public safety services, and ensure 2-1-1 service is available during disasters.
- Develop partnerships with other 2-1-1 and I&R providers, train I&R staff on all areas of I&R and 2-1-1, and increase public awareness of 2-1-1.

These policies indicate that Placer County will adhere to the AIRS standards for delivery of 2-1-1 service.

Section 4 – Documentation of Community Support

⁸ AIRS is the national professional membership organization of the I&R providers. AIRS' guidelines are the basis for the service delivery standards associated with use of the 2-1-1 dialing code as specified by D. 03-02-029. D.03-02-029, February 13, 2003, <u>http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf</u>

On August 23, 2019, the Placer County Board of Supervisors endorsed the county government to be the 2-1-1 service provider for Placer County. Placer County received 15 endorsement letters, ten from local organizations in the fields of health and human services and five from Placer County governmental entities. The cities of Colfax, Lincoln, Rocklin, and Roseville endorsed Placer County as the organization best qualified to be the 2-1-1 service provider in Placer County. The California Alliance of Information and Referral Services also submitted a letter to support Placer County's request for authority to provide 2-1-1 service. These endorsements indicate support from local governments as well as the community at large for Placer County to be the local 2-1-1 provider.

In processing Placer County's 2-1-1 application, CD considered in particular the inputs of local governments in Placer County because they oversee the operations of numerous agencies and programs regarding health and human services within Placer County and are therefore best equipped to evaluate whether an I&R provider is best fit to provide 2-1-1 service in the County. CD values the inputs of the local officials and take official notice of their actions.

Safety Considerations

Placer County will also integrate its 2-1-1 service into the county's emergency public information system to disseminate public information during disasters. During a disaster, the Health and Human Services, in tandem with the Office of Emergency Services, Public Health Emergency Preparedness program, Sheriff's Office, Information Technology, and the Communications and Public Affairs Office, will work with Connecting Point to disseminate critical public information on evacuations, shelters, road closures, utility outages, etc. 2-1-1 Placer will have a direct, positive public safety impact on Placer County residents during emergencies and disasters.

Implementation of 2-1-1 Calling

Placer County indicates that upon receiving the authority from the Commission to implement 2-1-1 service, it will negotiate with telecommunications service providers serving Placer County to establish 2-1-1 switch translation services. Placer County also notes that, in accordance with Ordering Paragraph 5 of D.03-02-029,⁹ it has obtained a

⁹ D.03-02-029, Ordering Paragraph 5 states, "Those implementing 2-1-1 service shall obtain an 8YY phone number that payphone operators and competitive local exchange carriers may use to direct calls to the I&R provider."

toll-free 8YY number that competitive local exchange carriers may use to route 2-1-1 calls.

Resolution T-17679, adopted by the Commission on November 7, 2019, authorizes CD to expend up to \$12,500 from the California Teleconnect Fund for switch translation costs and marketing and consumer education expenses in Placer County upon adoption of a resolution authorizing the 2-1-1 dialing code in the county. CD concludes that adoption of this resolution shall deem Placer County eligible for these funds to be spent consistent with Resolution T-17679.

Staff conclusions and recommendations

CD concludes that Placer County's application for authority to provide 2-1-1 service to Placer County meets the requirements set forth in D.03-02-029. CD finds that granting the authority requested is in the public interest as 2-1-1 will promote public safety in Placer County and conforms to the FCC's delegation of authority to the states to implement 2-1-1 programs.¹⁰ Therefore, CD recommends that the Commission grant Placer County's request to use the 2-1-1 dialing code to provide I&R services.

Terms and conditions

D.03-02-029 requires that an I&R provider that is granted authority must provide 2-1-1 service within one year of the Commission's granting of the authority. Therefore, Placer County is required to implement 2-1-1 service within one year from the date of this resolution. Failure to do so shall result in rescission of the authority by the Commission. A written notification of the date 2-1-1 service is first rendered to the public shall be provided to the Director of CD within five business days after service begins.

The authority granted by this resolution is not transferable except upon Commission approval. Should the Placer County Board of Supervisors wish to rescind, reassign, or modify its authority to use 2-1-1 dialing, it can provide a letter to the Commission's Executive Director. Placer County is required to seek approval from the Commission via a letter to the Director of CD 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in Placer County.

¹⁰ N11 Third Report and Order

D.03-02-029 does not require renewal of the authority granted to an I&R provider to provide 2-1-1 service or recertification of the I&R provider to whom the authority was granted. However, it is important that the Commission is kept informed and updated regularly on the services provided under the authority granted. Therefore, Placer County will be required to report to the Director of CD via email at <u>CDcompliance@cpuc.ca.gov</u> by March 1 of each calendar year the following information:

- a) Name of organization providing 2-1-1 service to Placer County and contact information (include person to contact)
- b) Geographic area(s) served
- c) Name of vendor providing 2-1-1 call center services and contact information
- d) Name of vendor providing resource database services and contact information
- e) Name of vendor providing after-hour service and contact information

Summary (not to exceed one page) of the 2-1-1 services provided during the previous calendar year, with specific mentions of all declared and non-declared disasters and emergencies during which 2-1-1 was activated.

COMMENTS

In compliance with Public Utilities Code § 311(g)(1), the Commission emailed a notice letter on February 21, 2020, informing utilities and other interested parties of the availability of this resolution for public comments at the Commission's website at <u>www.cpuc.ca.gov</u>. 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. The Commission received no public comments.

FINDINGS

- 1. Placer County is a county government in the State of California.
- 2. Placer County currently does not have 2-1-1 service.

- 3. On October 15, 2019, the Commission's Executive Director received via postal mail the application letter (application) submitted by Placer County requesting certification as the 2-1-1 service provider in Placer County. Placer County also sent a copy of its application via email to the service list for Rulemaking 02-01-025, which includes the appropriate incumbent local exchange carriers.
- 4. Placer County's Director of the Health and Human Services Department will lead the implementation of the county's 2-1-1 service and has contracted with Nevada Sierra Connecting Point Public Authority (Connecting Point) for 2-1-1 call center and database management services. Both Placer County and Connecting Point are experienced in providing information and referral (I&R) services.
- 5. On August 23, 2019, the Placer County Board of Supervisors approved Placer County to be the 2-1-1 service provider in the county. Placer County received support from the cities of Colfax, Lincoln, Rocklin, and Roseville; local health and social services organizations; and the California Alliance of Information and Referral Services for its request to serve as the local 2-1-1 provider.
- 6. Placer County's application meets the requirements set forth in Decision 03-02-029.
- 7. Granting Placer County's request to use the 2-1-1 dialing code to provide I&R services is in the public interest as 2-1-1 will promote public safety in Placer County and conforms to the Federal Communications Commission's delegation of authority to the states to implement 2-1-1 programs.
- 8. The Commission received no public comments.
- 9. Placer County should implement 2-1-1 service in Placer County within one year of the date of this resolution pursuant to Decision 03-02-029.
- 10. Placer County should notify the Director of the Communications Division (CD) in writing within five business days of the date 2-1-1 service is first rendered to the public.
- Resolution T-17679 authorizes CD to expend up to \$12,500 from the California Teleconnect Fund for switch translation costs and marketing and consumer education expenses in Placer County upon adoption of a resolution authorizing the 2-1-1 dialing code in the county. CD should spend these funds for 2-1-1 dialing implementation consistent with the Resolution.

- 12. Placer County should be required to report to the Director of CD by March 1 of each calendar year information about the 2-1-1 service.
- 13. The authority granted to Placer County to provide 2-1-1 service is not transferrable except upon Commission approval.
- 14. Placer County should be required to notify the Commission via a letter to the Director of Communications Division 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in Placer County.

THEREFORE, IT IS ORDERED that:

- 1. Placer County is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services in Placer County.
- 2. Placer County shall introduce 2-1-1 service in Placer County within one year of the date of this Resolution.
- 3. Placer County shall notify the Director of the Communications Division in writing of within five business days of the date 2-1-1 service is first rendered to the public.
- 4. Placer County shall not transfer the authority granted except upon Commission approval.
- 5. Carriers serving Placer County shall activate the 2-1-1 dialing code within five business days of Placer County filing a request for service.
- 6. The Communications Division is authorized to expend up to \$12,500 from the California Teleconnect Fund consistent with Resolution T-17679, Ordering Paragraph 5.
- 7. Placer County shall be required to notify the Commission via a letter to the Director of the Communications Division 30 days in advance of any changes to the geographic area served, vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in Placer County.
- 8. Placer County shall be required to report to the Director of the Communications Division via email at <u>CDcompliance@cpuc.ca.gov</u> by March 1 of each calendar year the following information:

- a) Name of organization providing 2-1-1 service to Placer County and contact information (include person to contact),
- b) Geographic area(s) served,
- c) Name of vendor providing 2-1-1 call center services and contact information,
- d) Name of vendor providing resource database services and contact information,
- e) Name of vendor providing after-hour service and contact information, and
- f) Summary (not to exceed one page) of the 2-1-1 services provided during the calendar year, with specific mentions of all declared and non-declared disasters and emergencies during which 2-1-1 was activated.

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 March 26, 2020, the following Commissioners voting favorable thereon: MARYBEL BATJER President LIANE M. RANDOLPH MARTHA GUZMAN ACEVES CLIFFORD RECHTSCHAFFEN GENEVIEVE SHIROMA Commissioners

/s/ ALICE STEBBINS

Alice Stebbins Executive Director