PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Communications Division Consumer Programs Branch RESOLUTION T- 17811 January 11, 2023

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Resolution T- 17811 Grant of authority to Tuolumne County Public Health Department to serve as the 2-1-1 service provider for Tuolumne County.

SUMMARY

This resolution grants Tuolumne County Public Health Department the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to Tuolumne County.

BACKGROUND

For individuals seeking non-emergency community information and support, the 2-1-1 telephone number serves as a crucial lifeline. Callers may call the 2-1-1 telephone number to access non-emergency community information and referral (I&R) providers. When dialing 2-1-1, callers are connected to a call center referral specialist who links them to the appropriate public agencies or organizations that can offer the needed social services, including housing, utility bill aid, food assistance, elder care, childcare, and other non-emergency information, currently not provided through 9-1-1 or 3-1-1 services.

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 concluded the assignment is in the public interest, recognizing that the public need for social service could be met through the

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").

implementation of a 2-1-1 dialing program. The FCC encouraged the states to implement 2-1-1 programs² 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) initiated Rulemaking (R.) 02-01-025 to establish the framework for 2-1-1 dialing implementation in California. The Commission's Decision (D.) 03-02-029 outlined the policies for 2-1-1 dialing.⁴ This decision mandated that Information and Referral (I&R) service providers seeking authorization for 2-1-1 services must submit a formal letter to the Commission's Executive Director.⁵ These letters were subject to review and certification, along with a service rollout plan. According to the decision, the Commission's staff would evaluate the proposals using the guidelines outlined in Appendix A and prepare a resolution for the Commission's consideration. The decision did not specify fixed deadlines for reviewing certification requests but indicated an approximate six-month timeframe for the Commission to approve a specific 2-1-1 proposal, encompassing I&R provider certification and service commencement.⁶

On June 3, 2010, the Commission instituted R.10-06-002 to authorize disaster-only 2-1-1 service in counties unserved by full-service 2-1-1 (unserved counties). In D.11-09-016, the Commission adopted the regulatory policies and procedures needed to implement disaster-only 2-1-1 dialing.⁷

In 2016, Governor Jerry Brown signed Senate Bill (SB) 1212 into law. The legislation authorizes the Commission to spend \$1.5 million from the California Teleconnect Fund Administrative Committee Fund to implement disaster-only 2-1-1 service in the unserved counties in California. This authority expired on January 1, 2023.⁸

On November 12, 2019, the Commission adopted Resolution (Res.) T-17679, granting Interface Children and Family Services (Interface) the authority to use the 2-1-1 dialing

² N11 Third Report and Order, p. 21

³ N11 Third Report and Order, p. 43

⁴ See, D.03-02-029, dated February 18, 2023, Appendix A. The full text of the decision is available online at: http://docs.cpuc.ca.gov/word_pdf/FINAL_DECISION/23645.pdf

⁵ Id., at 32; Conclusion of Law (COL) 3; Ordering Paragraph (OP) 2.

⁶ *Id.*, at 82; COL 18, 25; OP 2.

⁷ See, D.11-09-016, dated September 8, 2011. http://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/143224.PDF

⁸ Cal. Pub. Util. Code § 280(g).

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code to provide disaster-only 2-1-1 service to twelve unserved counties,⁹ and authorizing the expenditure of funds for the implementation of disaster-only 2-1-1 service in the unserved counties in accordance with SB 1212.¹⁰

On September 12, 2023, the Commission's Executive Director received via email the application letter (application)¹¹ submitted by Tuolumne County Public Health Department requesting certification as the 2-1-1 service provider in Orange County.

The Communications Division (CD or staff) published a notice of Tuolumne County Public Health Department's application in the Commission Daily Calendar for five business days from November 17 to November 27, 2023. The Commission received no comments in response to the notice.

DISCUSSION

Tuolumne County Public Health Department's 2-1-1 service application, in collaboration with Interface, demonstrates a strong organizational structure led by Director Michelle Jachetta, a history of providing information services since 1989, and a sound financial plan. The application adheres to terms and conditions, committing to free, 24/7, and accessible services without referral fees. It aligns with Alliance of Information and Referral Services (AIRS) standards, emphasizing high-quality service delivery, accurate resource database maintenance, and disaster preparedness. Community support is evidenced by endorsements from key service sectors. Overall, the application is comprehensive, meeting crucial criteria for 2-1-1 service designation. Granting Tuolumne County Public Health Department the authority to provide 2-1-1 services will ensure Tuolumne County residents receive essential support when needed.

Tuolumne County Public Health Department's Application

The application letter for the 2-1-1 service comprises of four sections. Tuolumne County Public Health Department provided information for each of the four sections as follows.

⁹ Alpine, Calaveras, Colusa, Del Norte, Inyo, Lake, Lassen, Madera, Mono, Siskiyou, Sutter, and Trinity counties

¹⁰ See, Res. T-17679, dated November 12, 2019. https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M319/K519/319519393.PDF

¹¹ The terms "application letter," "letter," and "application" used herein mean the package of materials the prospective I&R provider submits to 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

As administrator of 2-1-1 System, the County of Tuolumne possesses inherent authority to conduct business within the State of California and maintains a stable history of operation.¹² Established in 1850, the Tuolumne County Public Health Department has a history of providing information and referral services, including printed resource directories since 1989, and collaborations with various agencies.^{13,14} Tuolumne County contracted with Interface Children and Family Services (Interface) to provide 2-1-1 services, with Interface assuming no financial responsibility. Interface, an experienced service provider, has been the lead agency for 2-1-1 Ventura County since 2005 and holds accreditation from AIRS.¹⁵

Tuolumne County's organizational roles emphasize its position as the sole lead entity for 2-1-1 services. The County's Board of Supervisors appointed Michelle Jachetta as the Director of the Public Health Department, who is responsible for implementing the 2-1-1 System.¹⁶ Ms. Jachetta, with over 20 years of experience, leads in community health education, emergency management, and organizational leadership. Key personnel from Interface, including Kelly Brown and Lohanna Almanza, also bring extensive experience in 2-1-1 services.¹⁷

Regarding financial considerations, the Fiscal Year 2023-2024 County Budget is \$316,485,952, with \$11,721,639 allocated to the Public Health Department.¹⁸ The proposed 2-1-1 services budget outlines a three-year plan, incorporating grant funds for Interface's contract and anticipated service increases.

Specifically, 2-1-1 services are secured through the County Medical Services Program (CMSP) LICN grant funds until June 30, 2025.¹⁹ Additional disaster activation costs will be covered by the Tuolumne County Office of Emergency Services.²⁰ To ensure transparency, the audited financial statements, including a comprehensive annual

¹² *Id.*, p. 3.

¹³ County Health & Human Services Agency Departments (DSS, BH, Veterans, PH), Infant Child Enrichment Services (ICES), Amador Tuolumne Community Action Agency (ATCAA), FIRST 5, Adventist Health Sonora, Healthcare Providers, Tribal Medical, Behavioral Health, and Social Services, Interfaith Community Social Services, Food Banks, Nancy's Hope, and Area 12 Agency on Aging. *Lead Agency Application_211 Tuolumne County*, p. 2. ¹⁴ *Id.*, pp. 1-2.

¹⁵ *Id.*, p. 2.

¹⁶ Id., p. 1.

¹⁷ *Id.*, pp. 3-4.

¹⁸ *Id.*, p. 4.

¹⁹ Id.

²⁰ Id.

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financial report for Fiscal Year ending June 30, 2021, and the latest audit as of June 30, 2020, are available on the Tuolumne County website.²¹

Section 2 – Terms and Conditions of Service

This section outlines the terms and conditions that 2-1-1 service providers, specifically the County of Tuolumne, must adhere to in order to obtain and maintain their designation. Key points include the following:

- 1. *Geographic Service Area*²²: Tuolumne County Public Health Department is applying to provide 2-1-1 services for Tuolumne County, California;
- 2. *Referral Fees*²³: 2-1-1 Tuolumne County will not charge or accept fees for referrals;
- 3. *Free and Commercial-Free Service*²⁴: 2-1-1 information and referral services will be provided free of charge to callers and texters as well as online access. 2-1-1 service will be commercial-free, though supporters may be recognized on printed materials;
- 4. 24/7 *Live Call Handling*²⁵: The County of Tuolumne intends to contract with Interface for 24/7 live call handling;
- 5. *After-Hours Service and Service Delivery Standards*²⁶: The County of Tuolumne will provide services on a 24/7 basis through Interface;
- *6. Accessibility*²⁷: The County of Tuolumne contracted with Interface to ensure services are accessible 24/7, regardless of language or disability; and
- 7. *Language Accessibility*: Over 80% of Interface 2-1-1 staff are bilingual in English and Spanish. The County of Tuolumne provides interpretation services through

²¹ <u>Financial Data | Tuolumne County, CA - Official Website</u>.

²² The 2-1-1 service must cover at least one county.

²³ 2-1-1 service providers cannot accept fees from organizations in return for referrals.

²⁴ 2-1-1 services must be provided free of charge and without commercials or advertising. Recognition of supporters is allowed on printed materials.

²⁵ 2-1-1 service must be provided by live call takers 24/7.

²⁶ After-hours 2-1-1 services may be provided by another organization, but service delivery standards must be maintained.

²⁷ 2-1-1 service must be accessible 24/7, regardless of language or disability.

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Voiance and Language Line, covering over 150 languages. TTY/TDD access is available via the IPTTY system.²⁸

In summary, staff finds that the County of Tuolumne, in partnership with Interface, commits to providing accessible, free, and 24/7 2-1-1 services, adhering to specific language and disability inclusivity standards.

Section 3 – Alliance of Information and Referral Services Standards

AIRS,²⁹ the national professional membership organization for information and referral service providers, has instituted standards governing the delivery of information and referral services. This section delineates the specific standards set by AIRS concerning the provision of information and referral services within the framework of 2-1-1 services. The applicant, the County of Tuolumne, in collaboration with Interface, is mandated to adhere to these established standards. The ensuing narrative is expected to articulate how the applicant intends to meet and uphold these standards. The key points include:

Information and Referral Service Delivery Standards:

- Interface/2-1-1 Ventura County, an AIRS Accredited organization, manages 2-1-1 Tuolumne calls aligned with AIRS Standards.
- Interface 2-1-1 staff handle diverse inquiries, offering not only simple information but also conducting in-depth one-to-one referrals based on client assessments. Active listening techniques are employed to identify needs, and three appropriate referrals are provided, including detailed information on services, eligibility, and availability.
- Referrals are meticulously curated from the 2-1-1 Tuolumne County database, ensuring accuracy and relevance to presented needs.
- Client interactions are treated with utmost confidentiality. Interface 2-1-1 staff undergo rigorous training, sign confidentiality agreements, and utilize secure databases with layered password protection.

²⁸ Lead Agency Application_211 Tuolumne County, pp. 7-8.

²⁹ AIRS' guidelines are the basis for the service delivery standards associated with the use of the 2-1-1 dialing code as specified by D.03-02-029. *See*, D.03-02-029, p. 13.

• Special attention is given to vulnerable callers, with Interface 2-1-1 staff scheduling follow-up calls to assess ongoing needs and offer support.

Information and Referral Resource File Standards:

- Written criteria and a standardized profile guide the inclusion of resources in the 2-1-1 Tuolumne County database.
- Criteria for database inclusion/exclusion are accessible to the public, promoting transparency and accountability.
- A customized standardized profile tool, provided by Interface, ensures consistent and comprehensive data collection for agencies and services.
- Annual reviews, coupled with ongoing updates, guarantee that the 2-1-1 Tuolumne County resource database remains current and reliable.
- The AIRS Taxonomy, specifically the public 2-1-1 Ventura County AIRS taxonomy filter, is employed to index services, aligning with widely used standards in California.

Information and Referral Disaster Standards:

- 2-1-1 Tuolumne County services remain available during local disasters, backed by robust disaster plans.
- Service continuity during disasters is assured, with the Interface Call Center ready to shift calls and seek assistance if needed. The plan encompasses both local and remote incidents, with detailed protocols for staff expansion, call routing, and collaboration with other 2-1-1 providers.
- Comprehensive disaster plans exist for both Tuolumne County and Interface/2-1-1 Ventura County, covering various scenarios and detailing communication strategies, lead agency coordination, and potential service relocations.
- A pre-disaster resource database is maintained for swift response, providing information on ongoing public safety services and mirroring resources available in 2-1-1 Ventura County.

Reports and Measures Standards:

- iCarol database system facilitates data collection, ensuring confidentiality.
- Inquirer data confidentiality is maintained through the iCarol system, with restricted access and secure storage on iCarol servers.
- The system records referrals made, identifies service gaps, and allows for comprehensive data aggregation, enabling a nuanced understanding of the organizations receiving referrals and generalizable client needs.
- iCarol enables aggregated reporting for internal analysis, advocacy, and community planning. Staff can generate reports on client demographics, referral patterns, and call volume, contributing to informed decision-making and community outreach efforts.

Cooperative Relationship Standards:

- Collaborative working relationships with agencies like Area 12 Agency on Aging, ICES, and Tuolumne County Board of Supervisors ensure seamless 2-1-1 service access.
- Partnerships with targeted and local I&Rs are established, promoting collaborative support. Letters of support from Area 12 Agency on Aging, ICES, and Tuolumne County Board of Supervisors substantiate these partnerships.
- Callers experience seamless access to 2-1-1 services throughout the service area, bolstered by strong collaborative relationships with local agencies.

Other Organizational Standards:

- Training, public awareness, and evaluation plans ensure organizational excellence.
- Comprehensive training is provided to staff for all aspects of 2-1-1 services, covering call handling, resource database utilization, risk assessment, and crisis call triaging. Training utilizes AIRS Standards and 2-1-1 Ventura taxonomy.

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- A multi-faceted awareness campaign is planned, covering various channels such as promotional materials, media releases, collaborations with community organizations, and outreach through local schools and businesses.
- Regular evaluations are implemented to identify program improvements, with the plan updated annually. The County of Tuolumne Public Health Department plays a key role in reviewing data, discussing community needs, and updating the Public Health website with 2-1-1 data.

In summary, the County of Tuolumne, through its partnership with Interface, demonstrates a commitment to meeting the AIRS standards for the delivery of 2-1-1 services, including disaster preparedness, data collection, cooperative relationships, and public awareness efforts.

Section 4 – Documentation of Community Support

The Tuolumne County Public Health Department obtained endorsements from various sectors, including Area 12 Agency on Aging, Amador Tuolumne Community Action Agency (ATCAA), Adventist Health Sonora, and Center for a Nonviolent Community (CNVC). These endorsements demonstrate strong community backing for the 2-1-1 service provider application.³⁰

Safety Considerations

Interface, Tuolumne County's chosen contractor for 211 provider, has a crisis policy and procedures document that relates to safety. Interface ensures that their 211 Contact Specialists go through two weeks of initial training, including training related to safety concerns during calls and texts, with refresher training related to crisis protocols annually.³¹

COMMENTS

In compliance with Public Utilities Code § 311(g)(1), the Commission emailed a notice letter on December 6, 2023, informing the parties on the R.02-01-025 service list and the

³⁰ Lead Agency Application_211 Tuolumne County, Attachment 4-1, pp. 210-224.

³¹ Questions on 211 Tuolumne County Application – Response, p. 1.

local exchange carriers of the availability of this resolution for public comments at the Commission's website, <u>www.cpuc.ca.gov</u>. The notice letter also informed parties that the final confirmed resolution adopted by the Commission will be posted and available on the same website.

FINDINGS

- 1. Tuolumne County, an established government agency with a comprehensive leadership team led by Michelle Jachetta, has a history of providing information and referral (I&R) services since 1989.
- 2. Interface, an experienced service provider, has been the lead agency for 2-1-1 Ventura County since 2005.
- 3. Interface/2-1-1 Ventura County holds accreditation from the Alliance of Information and Referral Services (AIRS) and is aligned with AIRS Standards.
- 4. Tuolumne County's financial details, including a \$316,485,952 budget for Fiscal Year 2023-2024 and transparent funding sources, demonstrate fiscal responsibility.
- 5. Tuolumne County's 2-1-1 services will include no fees for referrals and a commitment to free, commercial-free, and accessible 24/7 services.
- 6. Partnership with Interface for 24/7 live call handling ensures service continuity and accessibility for diverse language needs.
- 7. Tuolumne County's comprehensive resource file standards, disaster preparedness, and robust reporting measures demonstrate commitment to meeting the AIRS standards for the delivery of 2-1-1 services.
- 8. Tuolumne County's application consists of cooperative relationships with local I&Rs and organizational standards, including training and public awareness.
- Tuolumne County's application includes strong endorsements from various sectors, including Area 12 Agency on Aging, ATCAA, Adventist Health Sonora, and CNVC. This demonstrates strong community backing for the 2-1-1 service provider application.
- 10. Tuolumne County's 2-1-1 service application demonstrates a comprehensive, well-supported proposal that fulfills crucial criteria for designation.

THEREFORE, IT IS ORDERED that:

- 1. The Tuolumne County Public Health Department is granted the authority to use the 2-1-1 abbreviated dialing code to provide information and referral services to Tuolumne County.
- 2. The Tuolumne County Public Health Department shall implement 2-1-1 service in Tuolumne County within one year of the date of this resolution pursuant to Decision 03-02-029.
- 3. The Tuolumne County Public Health Department shall notify the Director of Communications Division in writing within five business days of the date 2-1-1 service is first rendered to the public.
- 4. The Tuolumne County Public Health Department shall not transfer the authority granted except upon Commission approval.
- 5. The Tuolumne County Public Health Department shall notify the Commission via a letter to the Director of Communications Division 30 days in advance of any changes to the geographic area served, a vendor for call center and/or database management services, or the ability to continue as a 2-1-1 service provider in Orange County.
- 6. The Tuolumne County Public Health Department shall, for the duration of its provision of service, report to the Director of Communications Division via email at <u>CDcompliance@cpuc.ca.gov</u> by March 1 of each calendar year with the following information:
 - (a) Name of the organization providing 2-1-1 service to Orange County and contact information (include person to contact);
 - (b) Geographic area(s) served;
 - (c) Name of the vendor providing 2-1-1 call center services and contact information;
 - (d) Name of the vendor providing resource database services and contact information;
 - (e) Name of the vendor providing after-hour service and contact information;

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

> Rachel Peterson Executive Director