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**Date of Issuance 10/10/2025**

Decision 25-10-025 October 9, 2025

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

Order Instituting Rulemaking to  
Update the California Universal  
Telephone (California LifeLine)  
Program.

Rulemaking 20-02-008

**DECISION MODIFYING DECISION 24-05-003**

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## **DECISION MODIFYING DECISION 24-05-003**

### **Summary**

This decision modifies Decision (D.) 24-05-003, as well as the Foster Youth Long-Term Program and Pilot Program within the California Universal Telephone Service Program. The proceeding remains open.

### **1. Background**

On May 9, 2024, the California Public Utilities Commission (Commission) established the Foster Youth Long-Term Program (FY Program) and a Foster Youth Pilot in Decision (D.) 24-05-003.<sup>1</sup> The FY Program is part of the California Universal Telephone Service (California LifeLine) Program.

The Commission established the following eligibility criteria for the FY Program:

1. A participant must be either:
  - i. A minor in foster care between 13 years old and their 18th birthday; or
  - ii. A non-minor in extended foster care between 18 years old and their 21st birthday.
2. All applicants must provide a ward of court letter or a county dependency letter.
3. A foster youth minor must provide signatures from a caregiver or caseworker (Authorized Applicant) on their application.

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<sup>1</sup> The effective date of D.24-05-003 is May 9, 2024. The issuance date of D.24-05-003 is May 10, 2024.

4. A non-minor participant may continue to receive FY Program services for 6 months after they leave foster care or turn 21 years old.<sup>2</sup>

The Commission also established the Foster Youth Pilot to provide Commission staff with the flexibility to offer wireless services to participants in the FY Program.<sup>3</sup> Under the Foster Youth Pilot, there are no requirements to discontinue or reduce services due to Pilot participants' non-usage of services.<sup>4</sup> The Foster Youth Pilot also authorizes the FY Program Administrator to direct the service provider to terminate a participant's services upon receiving notice of a court order to suspend communications service for more than 120 days.<sup>5</sup>

### **1.1. Procedural Background**

On February 24, 2025, the Youth Law Center (YLC)<sup>6</sup> petitioned to modify D.24-05-003 (Petition) as follows:

1. Expand FY Program eligibility to any current and former foster youth or non-minor dependent ages 13 through 20 who were in foster care at any time on or after their 13th birthday.
2. Modify the FY Program document verification requirements to allow applicants to use reasonable alternatives to a ward of court or county dependency letter and eliminate any requirement for county verification of eligibility.

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<sup>2</sup> Decision (D.) 24-05-003 at 8.

<sup>3</sup> *Id.* at 15-16.

<sup>4</sup> *Id.* at 22.

<sup>5</sup> *Ibid.*

<sup>6</sup> The Youth Law Center was granted party status on March 14, 2024.

3. Modify the FY Program to allow current and former foster youth to submit an application based solely upon their own signature.
4. Replace the “Authorized Applicant” definition with the definition of “Authorized Representative” under title 22 of the California Code of Regulations, section 89201(a)(7).
5. Allow FY Program participants to receive FY Program benefits for six months after they turn 21 years old.
6. Limit an FY Program participant’s loss of eligibility to cases where a court order terminates participation permanently.<sup>7</sup>

On March 26, 2025, two parties filed responses to YLC’s Petition: The Utility Reform Network (TURN) and Verizon Value, Inc. d/b/a TracFone (Verizon).<sup>8</sup> In their responses, TURN and Verizon recommend that the Commission also modify D.24-05-003 to:

7. Include a non-usage policy.<sup>9</sup>
8. Extend the timeframe for transitioning all former participants in the iFoster Pilot, i.e., from May 14, 2025, to December 31, 2025.<sup>10</sup>

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<sup>7</sup> Petition at 2.

<sup>8</sup> When Verizon Value, Inc. commented on the Petition for Modification, it did so under its former name, TracFone Wireless, Inc. However, as of May 16, 2025, TracFone Wireless formally changed its name to Verizon Value, Inc. d/b/a TracFone via Advice Letter 127. As such, this decision refers to TracFone as Verizon.

<sup>9</sup> Response of The Utility Reform Network to the Petition of the Youth Law Center to Modify Decision 24-05-003 (TURN Response) at 4-5.

<sup>10</sup> TracFone Wireless Inc. Response to Petition of the Youth Law Center to Modify Decision 24-05-003 (Verizon Response) at 5-6.

## **1.2. Staff Proposal and Party Responses**

On June 13, 2025, the Administrative Law Judge admitted, “Staff Proposal: Modification to Decision 24-05-003, California LifeLine Foster Youth Proposal” (Staff Proposal) into the proceeding record and invited parties to comment. The Staff Proposal responds to the Petition and party responses, and offers further recommendations to modify D.24-05-003 to:

1. Allow FY Program participants to transition to the general California LifeLine program upon turning 18.<sup>11</sup>
2. Require service providers to preload the Family Urgent Response System (FURS) number onto each device before shipment.<sup>12</sup>

On June 27, 2025, TURN, Verizon, and YLC submitted opening comments on the Staff Proposal. On July 11, 2025, TURN and YLC submitted reply comments on the Staff Proposal.

## **1.3. Submission Date**

This matter was submitted on July 11, 2025, upon the filing of reply comments on the Staff Proposal.

## **2. Issues Before the Commission**

This decision addresses whether the Petition complies with the Commission’s procedural requirements and the following recommendations to modify D.24-05-003 from YLC, TURN, Verizon, and the Staff Proposal:

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<sup>11</sup> Staff Proposal at 3.

<sup>12</sup> *Id.* at 7.

1. Whether the Petition complies with the procedural requirements of Rule 16.4 of the Commission's Rules of Practice and Procedure (Rules).
2. Whether the Commission should expand FY Program eligibility to any current and former foster youth or non-minor dependent ages 13 through 20 who were in foster care at any time on or after their 13th birthday.
3. Whether the Commission should modify the FY Program document verification requirements to allow applicants to use reasonable alternatives to a ward of court or county dependency letter, and eliminate any requirement for county verification of eligibility.
4. Whether the Commission should modify the FY Program to allow current and former foster youth to submit an application based solely upon their own signature.
5. Whether the Commission should replace the "Authorized Applicant" definition with the definition of "Authorized Representative" under title 22 of the California Code of Regulations, section 89201(a)(7).
6. Whether the Commission should allow FY Program participants to receive FY Program benefits for six months after they turn 21 years old.
7. Whether the Commission should limit a FY Program participant's loss of eligibility to cases where a court order terminates participation permanently.
8. Whether the Commission should modify the FY Program to include a non-usage policy.
9. Whether the Commission should extend the timeframe for transitioning all former participants in the iFoster Pilot, i.e., from May 14, 2025, to December 31, 2025.

10. Whether the Commission should allow FY Program participants to transition to the general California LifeLine program upon turning 18.
11. Whether the Commission should require FY Program service providers to preload the FURS number onto each device before shipment.
12. Whether the Commission should waive the one per household rule for the duration of the FY Pilot to allow multiple members of the same household to be simultaneously enrolled in the FY LifeLine.

**3. Discussion of Modifications to D.24-05-003**

We modify D.24-05-003 based on the legal standard and the record discussed below.

**3.1. Legal Standard**

Public Utilities Code (Pub. Util. Code) Section 1708 authorizes the Commission to “rescind, alter, or amend any order or decision made by it” after providing proper notice to the parties and an opportunity to be heard.” The Commission’s authority under Pub. Util. Code Section 1708 must be exercised with care, justified by extraordinary circumstances, and remain consistent with the fundamental principles of *res judicata* because “Section 1708 represents a departure from the standard that settled expectations should be allowed to stand undisturbed.”<sup>13</sup>

Rule 16.4 governs the filing of a petition for modification, a procedural vehicle that “asks the Commission to make changes to an issued decision.”<sup>14</sup>

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<sup>13</sup> D.92058 (1980) 4 CPUC 2d 139, 1980 Cal. PUC LEXIS 785 at \*23- 24.

<sup>14</sup> Rule 16.4(a).



Rule 16.4(d) requires petitioners to file and serve their petition within one year of the effective date of the decision proposed to be modified, or to explain the late submission.

Here, YLC is a party to the proceeding and filed its Petition on February 24, 2025, within one year of D.24-05-003's effective date of May 9, 2024. As such, we find that YLC's Petition complies with the procedural requirements of Rule 16.4.

### **3.2. FY Program Eligibility**

In its Petition, YLC recommends modifying D.24-05-003 to extend FY Program eligibility to include any current or former foster youth or non-minor dependents ages 13 through 20 who were in foster care at any time on or after their 13th birthday.<sup>15</sup> According to YLC, the current eligibility requirements in D.24-05-003 fail to recognize that foster youth and non-minor dependents often enter and exit the foster care system numerous times.<sup>16</sup> YLC asserts that its proposed modifications better align with the underlying principles of the FY Program, which aims to serve the underserved foster youth community, including those who have left foster care.<sup>17</sup>

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<sup>15</sup> Petition at 6.

<sup>16</sup> *Id.* at 7-9 (referencing study showing almost 150,000 foster children who left their first spell of foster care between 2003-2010 reentered foster care before January 1, 2018).

<sup>17</sup> *Id.* at 7, 9-10.

Verizon and TURN support YLC's proposed changes to the FY Program eligibility criteria.<sup>18</sup> Staff also support the Petition's proposed modification.<sup>19</sup> However, the Staff Proposal asks that the Commission establish verification procedures to ensure the FY Program complies with the Moore Universal Telephone Services Act (Moore Act), which limits California LifeLine service to one subscription per household.<sup>20</sup>

YLC cautions against a blanket policy of limiting FY Program service to one subscription per household.<sup>21</sup> YLC states that, in some foster care situations, multiple children from the same original household may be placed in a single household, which could disqualify foster youth from the FY Program.<sup>22</sup> YLC recommends that the Commission require the FY Program Administrator to contact members of the youth's care team and the county agency if more than one FY Program participant is listed at a single address. If the FY Program Administrator finds that the FY Program participants were reunified in the same household, the FY Program Administrator should not direct the service provider to terminate services.<sup>23</sup>

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<sup>18</sup> Verizon Response at 3; TURN Response at 1-4 (referencing report that between 2018 and 2022, 12%-13% of former California foster youth re-entered care more than 12 months after leaving).

<sup>19</sup> Staff Proposal at 3.

<sup>20</sup> *Ibid.*; see also Pub. Util. Code Section 878.

<sup>21</sup> Opening Comments of the Youth Law Center on the Staff Proposal to Modify Decision 24-05-003, California LifeLine Foster Youth Program (YLC Opening Comments) at 4.

<sup>22</sup> *Ibid.*

<sup>23</sup> *Id.* at 5.

TURN agrees with the YLC's concerns and recommends that the Commission modify D.24-05-003 to waive the one benefit per household rule and allow multiple members of the same household to receive FY Pilot service if they are otherwise eligible.<sup>24</sup>

We find that good cause exists to modify D.24-05-003 to expand eligibility to participate in the FY Program. We also waive the Moore Act's one-per-household rule for the duration of the FY Pilot.<sup>25</sup> As described by YLC and TURN, these modifications better reflect the reality of foster care and better align with the FY Program's goals. The Conclusions of Law in D.24-05-003 are modified as follows:

1(a). A participant must be ~~either (i) a current or former foster youth or non-minor dependent between 13-20 years old and their 18<sup>th</sup> birthday, or (ii) a non-minor in extended foster care between 18 years old and their 21<sup>st</sup> birthday of~~ **age, who was in foster care or extended foster care at any time on or after their 13th birthday.**

1(d). A non-minor participant may continue to receive Foster Youth Program services for 6 months after they ~~leave foster care or turn 21 years old.~~

~~6. If a county child welfare agency informs the FY Program Administrator that a Foster Youth Program participant is no longer a ward of the court or county dependent, the FY Program Administrator should contact the participant.~~

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<sup>24</sup> Reply Comments of The Utility Reform Network on the Administrative Law Judge's Ruling Admitting Staff Proposal: Modification to Decision 24-05-003, California LifeLine Foster Youth Program and Seeking Comments (TURN Reply Comments) at 1-3.

<sup>25</sup> The duration of the FY Pilot is five years from the effective date of D.24-05-003.

~~6-7. If the county child welfare agency informs the FY Program Administrator that a non-minor is no longer in foster care. Once a youth or has turned 21 years old, it is reasonable to require then the FY Program Administrator should to send text messages to inform the foster youth (a) that program services will end in six months, and (b) how to apply for the general California LifeLine program.~~

**16. It is reasonable and consistent with the public interest to waive the one-per-household limitation for the duration of the FY Pilot to allow multiple eligible foster youths residing at the same address, including those placed together following family reunification, to receive program benefits.**

### **3.3. FY Program Document and Verification Requirements**

YLC recommends modifying D.24-05-003 to allow current and former foster youth and non-minor dependents to verify their FY Program eligibility through reasonable alternatives to “a ward of court letter” or “a county dependency letter.”<sup>26</sup> YLC asserts that D.24-05-003’s requirements present several challenges, including the potential disclosure of sensitive and confidential information, a lack of standardization, significant wait times, and failure to account for changes in foster youth placements.<sup>27</sup> According to YLC, obtaining a verification letter or written statement from an alternative qualified individual, such as the California Office of the Foster Care Ombudsperson or a placement agency employee, is easier and does not require divulging

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<sup>26</sup> Petition at 10.

<sup>27</sup> *Id.* at 10-13.

confidential information.<sup>28</sup> YLC also recommends that the Commission include criteria for the verification letters.<sup>29</sup>

Verizon and the Staff Proposal support YLC's recommendation to remove the requirement for ward of the court and county verification letters.<sup>30</sup> However, Staff notes that many of the specific alternative entities proposed by YLC may not be authorized to share confidential youth information.<sup>31</sup> As such, the Staff Proposal recommends that the FY Program Administrator continue to verify eligibility with designated county liaisons through its county portal. The Staff Proposal also suggests that the FY Program pursue verifying eligibility through database matching with the California Department of Social Services' (CDSS) Child Welfare Services/Case Management System (CWS/CMS) or California Automated Response and Engagement System (CARES).<sup>32</sup> According to the Staff Proposal, a data-sharing agreement with CDSS would be especially helpful in verifying the eligibility of out-of-care foster youth.<sup>33</sup>

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<sup>28</sup> *Id.* at 14-15.

<sup>29</sup> *Id.* at 15-16.

<sup>30</sup> Verizon Response at 3; Staff Proposal at 4.

<sup>31</sup> Staff Proposal at 4.

<sup>32</sup> *Ibid.*

<sup>33</sup> *Id.* at 3-4.

TURN supports establishing a limited data-sharing agreement with CDSS, noting that database sharing with CalFresh and Medi-Cal has been beneficial for the California LifeLine program.<sup>34</sup>

However, YLC asserts that “a full-scale data sharing agreement between the Commission and CDSS could be years away from being implemented and may not ever be executed.”<sup>35</sup> YLC urges the Commission to adopt its recommendation in the Petition and defer to the experience of members of a foster youth’s care team to determine whether they can share limited information about the youth’s foster care status.<sup>36</sup>

Regarding D.24-05-003’s requirement that all FY Program applicants provide a ward of the court or county dependency letter to verify eligibility, we agree with YLC, Staff, and parties. This requirement is overly burdensome, and modification of the decision is warranted. We, therefore, grant the Petition’s request to remove the requirement for supporting documentation.

Similarly, we will allow foster youth to verify their eligibility with a verification letter or written statement from the California Office of the Foster Care Ombudsperson (Ombudsperson Office), if the county liaisons have not validated within 21 calendar days. In such cases, the FY Program Administrator

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<sup>34</sup> Opening Comments of The Utility Reform Network on the Administrative Law Judge’s Ruling Admitting Staff Proposal: Modification to Decision 24-05-003, California LifeLine Foster Youth Program and Seeking Comments (TURN Opening Comments) at 3.

<sup>35</sup> YLC Opening Comments at 6; *see also* Reply Comments of Youth Law Center on the Staff Proposal Modifying Decision 24-05-23 and California LifeLine Foster Youth Program (YLC Reply Comments) at 1-2 (agreeing with TURN that limited database matching with CDSS can be effective but that agreement with CDSS is speculative at this time).

<sup>36</sup> YLC Opening Comments at 7.

should contact the youth and the Authorized Representative to inform them of the delay and offer the opportunity to provide a verification letter from the Ombudsperson Office, which the FY Program Administrator will use to verify the applicant's eligibility.

We recognize that there are potentially many strategies that could ease administrative burdens and streamline eligibility determinations for the FY Program. Party proposals include recommendations to rely upon initial attestations of foster youth with backend verification or eligibility, as well as enhancing trusted partnership with relevant agencies. While we decline to adopt some of these specific requirements, at this time, we recognize the importance of continuing to iterate and improve on this program to minimize barriers for foster youth participation. Staff will continue to review strategies to improve this program to streamline eligibility and reduce waste, fraud, and abuse. We also intend to further develop and iterate on a trusted partner framework.<sup>37</sup> To this end, we authorize the Communications Division Staff to revise the FY Pilot and FY Program through the Commission's resolution process.

Here, we agree with TURN and Staff that permitting county liaisons to verify eligibility through the FY Program Administrator's customer portal and developing a limited database matching agreement with CDSS are reasonable alternatives to the ward of court and county dependency letters. The portal has had a positive impact on the verification process. Although initial challenges

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<sup>37</sup> Proposed Decision Implementing California LifeLine Enrollment Path for Californians Without Social Security Numbers at 15-16.

arose during implementation, those challenges have since been resolved, and the application process continues to demonstrate ongoing improvements.

Accordingly, we modify Conclusion of Law 1(b) in D.24-05-003 as follows:

**1(b). ~~All applicants must provide a ward of court or a county dependency letter.~~ The FY Program Administrator must verify that applicants were in foster care on or after their 13th birthday. Acceptable verification may include county verification through the FY Program Administrator's customer portal or an established database match, such as CWS/CMS or CARES. If the county verification process exceeds 21 calendar days, the FY Program Administrator is permitted to validate eligibility with a verification letter from the California Office of the Foster Care Ombudsperson. Staff have discretion to authorize other methods of validation through the Commission's resolution process.**

We also add Conclusion of Law 22 as follows:

**22. It is reasonable to authorize staff to propose revisions to the FY Pilot and FY Program through the Commission's resolution process, in particular as it relates to strategies to streamline FY Program eligibility determinations and reduce waste, fraud, and abuse.**

### **3.4. FY Program Signature Requirements**

YLC recommends modifying D.24-05-003 to eliminate the requirement that foster youth minors must obtain a signature from an "Authorized Applicant," defined as a caseworker or caregiver, on the FY Program application.<sup>38</sup>

According to YLC, this requirement interferes with the protected rights under California's Foster Youth Bill of Rights by creating a barrier for foster youth to

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<sup>38</sup> Petition at 16.



participate in age and developmentally appropriate activities, such as the internet.<sup>39</sup> YLC asserts that a foster youth's or non-minor dependent's signature should be sufficient.<sup>40</sup> YLC also states that it is not opposed to other eligible persons or entities providing their signature on behalf of an FY Program applicant.<sup>41</sup>

Verizon supports YLC's proposal.<sup>42</sup> Staff also agree with the logic behind YLC's proposal.<sup>43</sup> However, the Staff Proposal recommends a different approach. According to the Staff Proposal, the FY Program has an existing process that enables youth to submit their applications through the online portal. The application then routes to the caregiver for signature. If the caregiver does not sign within seven days, the application proceeds to the county for verification. The Staff Proposal recommends maintaining this current model because it keeps the caregiver engaged (when applicable) and does not prohibit the youth from receiving their phone if the caregiver is unresponsive.<sup>44</sup>

In agreement with YLC's proposal, the Staff Proposal recommends a second model where a county representative may apply on behalf of the youth through the county portal, absent the youth's signature.<sup>45</sup> The representative

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<sup>39</sup> *Id.* at 16-18.

<sup>40</sup> *Id.* at 17.

<sup>41</sup> *Id.* at 18.

<sup>42</sup> Verizon Response at 3.

<sup>43</sup> Staff Proposal at 5.

<sup>44</sup> *Ibid.*

<sup>45</sup> *Ibid.*

must attest that the youth permitted the representative to submit the application on their behalf. Staff assert their recommendation is aligned with YLC's proposal to allow other eligible people or entities to provide a signature on behalf of the FY Program applicant.

TURN supports the alternative approach described in the Staff Proposal.<sup>46</sup> However, YLC asserts that the current model's two-step review process with a mandatory seven-day caregiver review period is unnecessary and will create further barriers.<sup>47</sup> YLC urges the Commission to streamline the FY Program application process for foster youth and accept a foster youth's signature as sufficient for an FY Program application.<sup>48</sup>

YLC and Staff have persuaded us that there may be scenarios in which requiring a signature from an Authorized Applicant is overly burdensome for FY Program applicants. We, therefore, modify D.24-05-003 to allow authorized county representatives to submit applications on behalf of foster youth and permit non-minor foster youth to submit and sign applications independently. While we decline to allow foster youth minors to sign on their behalf due to potential practical and legal concerns, we will shorten the seven-day caregiver information review period to a two-day information review period. A two-day information-review period provides an opportunity to keep the caregiver engaged while also reducing unnecessary delays. However, the information

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<sup>46</sup> TURN Opening Comments at 1.

<sup>47</sup> YLC Opening Comments at 8-9.

<sup>48</sup> *Id.* at 9.

review period does not grant the caregiver the authority to approve or deny the foster youth's ability to obtain a device.

Conclusion of Law 4(g) in D.24-05-003 is, therefore, modified as follows:

4(g). Non-minor foster youth may independently submit **and sign** applications, or ~~caseworkers~~ **county child welfare agencies** may submit applications on behalf of non-minor **and minor** foster youth, with the ~~signature~~ **consent** of the foster youth.

### **3.5. Replacing “Authorized Applicant” With “Authorized Representative”**

In D.24-05-003, Authorized Applicants must sign a foster youth minor's application, may submit applications on behalf of foster youth, and serves as a point of contact for the FY Program Administrator when there are anomalies in an application.<sup>49</sup>

YLC asserts that the FY Program's use of the “Authorized Applicant” definition is narrowly drawn to only include caregivers and caseworkers, and does not capture the breadth of individuals who are authorized to act on behalf of foster youth.<sup>50</sup> According to YLC, the high placement mobility of foster youth and the busy workloads of caseworkers justify allowing other qualified individuals and entities to provide their signature. YLC recommends replacing the “Authorized Applicant” definition used in the FY Program with “Authorized Representative” from title 22 of the California Code of Regulations, section 89201(a)(7). Section 89201(a)(7) defines “Authorized Representative” broadly as

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<sup>49</sup> D.24-05-003 at Conclusions of Law 1, 4(e), 4(f).

<sup>50</sup> Petition at 19.

the “person or entity authorized by law to act on behalf of a ‘child,’” including “a parent or attorney of a ‘child,’ Court Appointed Special Advocates (CASA), a legal guardian, a conservator, or a public placement agency.”

TURN, Verizon, and the Staff Proposal all support YLC’s proposal.<sup>51</sup> However, the Staff Proposal recommends replacing “Authorized Applicant” with “county child welfare agencies” instead of Authorized Representatives.<sup>52</sup>

We are persuaded that the objectives of the FY Program will be better achieved by modifying D.24-05-003 to replace “Authorized Applicant” with “Authorized Representative.” Authorized Representative is statutorily defined and will enable a broader number of individuals to assist applicants with the FY Program. We, therefore, modify Conclusions of Law 1(c), 4(e), and 4(f) in D.24-05-003 as follows:

1(c). A foster youth minor must provide signatures from an Authorized ~~Applicant~~ **Representative** on their application.

4(e). When it finds anomalies in an application, the FY Program Administrator will contact the Authorized ~~Applicant~~ **Representative** and the county child welfare agency to verify the accuracy of the information provided in the application.

4(f). Authorized ~~Applicants~~ **Representatives** may submit applications on behalf of minor foster youth, with the signature of the foster youth.

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<sup>51</sup> Verizon Response at 3; TURN Opening Comments at 1; Staff Proposal at 5.

<sup>52</sup> Staff Proposal at 5.

### **3.6. FY Program Benefits for Participants Over 21 Years**

YLC recommends modifying the FY Program to allow non-minor dependents who depart from foster care between the ages of 18 and 21 to retain Program benefits for six months after turning 21 years old.<sup>53</sup> YLC cites studies surveying current and former foster youth, which find that foster youth often experience material hardships, including lack of access to smartphones, which impact their academic and employment opportunities and their transition to adulthood.<sup>54</sup> Furthermore, YLC states that many state and federal programs allow foster care youth to remain in care, receive healthcare, and retain program benefits into their 20s.<sup>55</sup>

Verizon supports YLC's recommendation.<sup>56</sup> We agree that extending benefits to non-minor foster youth for six months after turning 21 aligns with the FY Program's goals of providing reliable access to communications services and supporting participants' transition into the general California LifeLine program. As such, we affirm the modification in Conclusion of Law 1(d) of D.24-05-003 as follows:

1(d). A non-minor participant may continue to receive Foster Youth Program services for 6 months after they ~~leave foster care or~~ turn 21 years old.

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<sup>53</sup> Petition for Modification at 20.

<sup>54</sup> *Id.* at 20-21.

<sup>55</sup> *Id.* at 22.

<sup>56</sup> Verizon Response at 3.

### **3.7. FY Program Participant's Loss of Eligibility**

Currently, the FY Program Administrator directs the service provider to terminate a participant's services if the FY Program Administrator receives notice of a court order to suspend communications services for more than 120-days.<sup>57</sup>

YLC recommends revising D.24-05-003 to limit a FY Program participant's loss of eligibility to only cases where a court order terminates participation permanently.<sup>58</sup> YLC asserts that terminating services after a temporary suspension period may create future barriers to restoring services.<sup>59</sup> According to YLC, foster youth need communications services to petition for restoration of temporarily suspended services, and the termination limits their ability to navigate that process.<sup>60</sup> Thus, YLC recommends terminating services only under explicit court orders permanently barring participation in the FY Program.<sup>61</sup>

Verizon states that if the Commission were to adopt a temporary suspension period, it recommends a 90-day period instead of 120 days due to operational factors.<sup>62</sup> Verizon asserts its national Simple Mobile brand's back-office platforms rely upon a 90-day limit for temporary suspensions of service,

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<sup>57</sup> D.24-05-003 at 22, Conclusion of Law 13.

<sup>58</sup> Petition at 23.

<sup>59</sup> *Ibid.*

<sup>60</sup> *Ibid.*

<sup>61</sup> *Ibid.*

<sup>62</sup> Verizon Response at 4.

making it difficult to comply with the current 120-day temporary suspension period required by court order.<sup>63</sup>

Staff agree with Verizon's recommended suspension period of 90-days. According to the Staff Proposal, a 90-day temporary suspension would help industry providers align their systems with back-office systems and federal regulations, like 47 CFR § 52.15(f)(1)(ii),<sup>64</sup> allowing for operational and administrative consistency.<sup>65</sup> The Staff Proposal asserts that if a court order prevents youth from accessing a communications service, the youth should not be given access, regardless of the temporary nature of the suspension order.<sup>66</sup> Nevertheless, foster youth whose FY Program service is terminated due to a temporary court order may reapply for the benefit in the future.<sup>67</sup>

It is imperative to comply with court orders regarding the temporary suspension of services. Furthermore, we agree with Verizon and the Staff Proposal that adjusting the suspension period to 90 days would enhance operational and administrative efficiency. As such, we modify Conclusion of Law 13 in D.24-05-003 as follows:

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<sup>63</sup> *Id.* at 4-5.

<sup>64</sup> 47 CFR § 52.15(f)(1)(ii) states "Aging numbers are disconnected numbers that are not available for assignment to another end user or customer for a specified period of time. Numbers previously assigned to residential customers may be aged for no less than 45 days and no more than 90 days. Numbers previously assigned to business customers may be aged for no less than 45 days and no more than 365 days."

<sup>65</sup> Staff Proposal at 6.

<sup>66</sup> *Ibid.*

<sup>67</sup> *Ibid.*

~~1213~~. It is reasonable to establish the following suspension of service provision for the Foster Youth Pilot: if the FY Program Administrator receives notice of a court order to suspend communications services for more than ~~120~~ 90 days, then it will direct the service provider to terminate program services for the participant, **and the youth may reapply after the suspension period ends or once the court order has been removed, whichever occurs first.**

### **3.8. FY Program Non-Usage Policy**

In its response to YLC's Petition, TURN requests that the Commission provide foster youth usage data to solicit stakeholder input into establishing a non-usage policy.<sup>68</sup> TURN states that the non-usage policy should appropriately balance foster youth's communications rights and needs with the need to steward FY Program funds.<sup>69</sup> The Staff Proposal recommends implementing a three-month (i.e., 90-day) non-usage rule.<sup>70</sup> Staff assert this is sufficient time for the FY Program Administrator to provide notice and instructions to foster youth regarding service use, while being prudent with program funds.<sup>71</sup>

Verizon supports the proposed 90-day rule and recommends setting an effective date no sooner than January 1, 2026.<sup>72</sup> It asserts that implementing a non-usage rule will substantially increase Verizon's and the FY Program

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<sup>68</sup> TURN Response at 5.

<sup>69</sup> *Ibid.*

<sup>70</sup> Staff Proposal at 5.

<sup>71</sup> *Ibid.*

<sup>72</sup> Verizon Value, Inc. D/B/A TracFone Comment on Administrative Law Judge's Ruling Admitting Staff Proposal: Modification to Decision 24-05-003 (Verizon Opening Comments) at 5.



Administrator's administrative effort for enrollment and detailed monitoring of usage.<sup>73</sup> Verizon further argues that the systems Verizon and the FY Program Administrator will employ to implement the non-usage rule require time to test and implement the change.<sup>74</sup>

TURN notes that while it initially contemplated a more extended period of non-usage, it "believes that the Staff Proposal strikes an appropriate balance between maintaining service for foster youth and limiting support for service that goes unused."<sup>75</sup> However, TURN recommends that the FY Program Administrator use methods of contacting inactive subscribers other than calling or texting.<sup>76</sup> Specifically, TURN suggests that the FY Program Administrator send e-mails when possible.<sup>77</sup> TURN explains that multiple forms of outreach could prevent loss of service in case the youth have lost or damaged their phone.<sup>78</sup> As such, TURN also recommends that the FY Program Administrator's e-mail notification include information on how to request a replacement phone.<sup>79</sup>

YLC supports adopting a 90-day non-usage rule and recommends that the FY Program Administrator take two specific precautions to prevent unnecessary

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<sup>73</sup> *Ibid.*

<sup>74</sup> *Id.* at 5-6.

<sup>75</sup> TURN Opening Comments at 2.

<sup>76</sup> *Ibid.*

<sup>77</sup> *Ibid.*

<sup>78</sup> *Id.* at 2-3.

<sup>79</sup> *Id.* at 2.

loss of FY Program access.<sup>80</sup> First, YLC suggests the FY Program Administrator send both text and email notifications every two weeks during a 60-day notification period.<sup>81</sup> Second, YLC recommends that the FY Program Administrator confirm the foster youth does not have a pending request for device or equipment replacement before directing the service provider to terminate service, as non-usage may be due to device damage or misplacement.<sup>82</sup>

YLC also asks the Commission to implement the non-usage rule no sooner than six months after issuance of its decision, instead of Verizon's recommended date of January 1, 2026.<sup>83</sup> YLC explains that the uncertainty surrounding the issuance date of the modifying decision means a timeframe may be preferable to a fixed date.<sup>84</sup> Additional time allows stakeholders to inform participants of upcoming changes.<sup>85</sup>

We agree with all commenting parties that a three-month non-usage rule balances the needs of the FY Program with the need to steward FY Program funds. For the implementation date, we adopt March 1, 2026, to give industry providers, like Verizon, sufficient time to develop, test, and implement the non-usage rule. Regarding notifications, we agree with TURN and YLC that the FY

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<sup>80</sup> YLC's Opening Comments at 10.

<sup>81</sup> *Ibid.*

<sup>82</sup> *Ibid.*

<sup>83</sup> YLC Reply Comments at 6

<sup>84</sup> *Ibid.*

<sup>85</sup> *Ibid.*

Program Administrator should send text and email notifications, as well as information about requesting a replacement phone.

To ease the administrative burden of this new rule, we find it reasonable for the FY Program Administrator to send notifications at intervals of 30, 60, and 75 days, informing the youth that they must use their phone to remain in the program.

We also find it appropriate to adopt a modified version of the general California LifeLine program's definition of "usage" in General Order 153, Section 5.7.1.1.<sup>86</sup> The one exception to our adoption of Section 5.7.1.1 is that we require non-usage to occur over 90 days, instead of 30 days.<sup>87</sup> If the youth does not use their phone by day 90 and does not have a pending equipment replacement request, the FY Program Administrator shall coordinate with the service provider to terminate service on day 91. The foster youth may reapply for the benefit when they are ready to resume service.

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<sup>86</sup> GO 153, Section 5.7.1.1 states: "For the purposes of de-enrollment provision, 'usage' is defined according to the requirements of 47 C.F.R. Section 54.407(c)(2)." Under 47 C.F.R. Section 54.407(c)(2), "Any of these activities, if undertaken by the subscriber, will establish 'usage' of the Lifeline service: (i) Completion of an outbound call or usage of data; (ii) Purchase of minutes or data from the eligible telecommunications carrier to add to the subscriber's service plan; (iii) Answering an incoming call from a party other than the eligible telecommunications carrier or the eligible telecommunications carrier's agent or representative; (iv) Responding to direct contact from the eligible communications carrier and confirming that he or she wants to continue receiving Lifeline service; or (v) Sending a text message.

<sup>87</sup> 47 C.F.R. Section 54.407(c)(2) states that subscribers must use their service within the last 30 days. We adopt a 90-day non-usage policy for the FY Program.

Lastly, we agree with TURN and YLC that before termination of service, the FY Program Administrator should ensure the youth do not have a pending request for equipment replacement.

As such, we modify D.24-05-003 to add Conclusions of Law 17, 18, 19, 20, and 21, as follows:

**17. Effective March 1, 2026, it is reasonable to establish and commence tracking foster youth participants' usage to implement a 90-day non-usage rule to allow sufficient time for the FY Program Administrator to contact the foster youth to notify them about the non-usage. Upon identifying that a youth has not used their program-issued phone for 30-days, the FY Program Administrator should send text and (where applicable) email notifications on days 30, 60, and 75 to advise the youth that they will lose service if they do not use their phone before the 90-day window. The notifications should inform the foster youth on how to request a replacement phone in case the youth no longer have access to their phone.**

**18. It is reasonable for the FY Program Administrator to ensure the foster youth participant has not requested replacement equipment in the 90 days prior to the scheduled date for disconnecting the participant's service for non-usage. For youth participants not de-enrolled based upon a recent request for a replacement device, such youth shall have an additional 90 days from the date the request for the replacement device was fulfilled or denied to use their device or be subject to de-enrollment.**

**19. It is reasonable for the FY Program Administrator to assume the youth no longer has their phone if the youth does not use their phone by day 90 and they do not have a pending request for equipment replacement. As such, it is**

**reasonable for the FY Program Administrator to work with the service provider to terminate service on day 91.**

**20. It is reasonable to require the FY Program Administrator to retain the foster youth's information for at least six months after termination of service for non-usage to facilitate streamlined re-enrollment.**

**21. It is reasonable to adopt a modified version of the general California LifeLine Program's definition of "usage" for the FY Program. The non-usage period should be extended from 30 days to 90 days.**

### **3.9. Timeframe for Transitioning iFoster Pilot Participants**

Verizon requests an extension for transitioning all former iFoster Pilot participants to the new FY Pilot and FY Program from May 14, 2025, to December 31, 2025.<sup>88</sup>

We agree that the time for transitioning iFoster Pilot participants into the new FY Pilot and FY Program should be extended. We modify Conclusion of Law 5(a) in D.24-05-003 as follows:

**1314(a).** All iFoster Pilot participants (as of May 15, 2024) should be deemed eligible to participate in the new Foster Youth Pilot and Foster Youth Program until ~~May 14~~ **December 31, 2025**, and should be automatically transitioned to the new Foster Youth Pilot and Foster Youth Program unless they opt out.

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<sup>88</sup> Verizon Response at 5-6.

### **3.10. FY Program Participants Transition to General LifeLine Program Upon Turning 18**

Staff propose that once foster youth turn 18 years old, they should have the option to transition to the general California LifeLine program.<sup>89</sup> Staff base this recommendation on the expanded eligibility of the FY Program to include out-of-care youth, as well as feedback from participants.<sup>90</sup> If the Commission adopts the recommendation, the FY Program Administrator will contact the foster youth once they turn 18 to inform them of their potential eligibility for the general California LifeLine program and broader options, including bringing their device.<sup>91</sup> Staff note that if the non-minor youth are not ready to transition into the general California LifeLine program, they will remain eligible for the FY Program until age 21.

Verizon supports the Staff Proposal. Verizon asserts that non-minor foster youth may have different communication needs than those provided by the FY Program, and early outreach gives the youth time to explore their options.<sup>92</sup> TURN also supports giving foster youth the option to enroll in the general California LifeLine when they turn 18.<sup>93</sup> TURN asserts that California LifeLine has more participating service providers than the FY Program, which gives foster youth more options to switch providers as they see fit.<sup>94</sup>

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<sup>89</sup> Staff Proposal at 3.

<sup>90</sup> *Ibid.*

<sup>91</sup> *Ibid.*

<sup>92</sup> Verizon Opening Comments at 4.

<sup>93</sup> TURN Opening Comments at 3.

<sup>94</sup> *Ibid.*

We agree that giving foster youth the ability to transition to the general California LifeLine program upon turning 18 provides them with more options and flexibility while supporting continued service and a smoother transition. As such, we further modify Conclusion of Law 1(a) D.24-05-003 as follows:

1(a). A participant must be ~~either (i) a current or former~~ foster youth or **non-minor dependent** between 13-20 years old ~~and their 18<sup>th</sup> birthday, or (ii) a non-minor in extended foster care between 18 years old and their 21<sup>st</sup> birthday of age, who was~~ **in foster care or extended foster care at any time on or after their 13th birthday. Upon turning 18, the youth should be given the option to transition to the general California LifeLine program.**

This modification provides an appropriate balance between informing foster youth about the general California LifeLine program when they turn 18 and allowing them to make independent enrollment decisions.

### **3.11. Preloading FURS Onto Each Device**

In D.24-05-003, the Commission requires the FY Program Administrator to create digital literacy material, including instructions on how to add the FURS foster care crisis hotline number to the contacts list, and to text each participant the FURS number upon service activation.<sup>95</sup> Staff recommend revising D.24-05-003 to require that the FURS's number be preloaded on FY Program participants' phones.<sup>96</sup>

In support of their recommendation, Staff recognize ongoing efforts by the Commission, the FY Program Administrator, and Verizon to activate devices

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<sup>95</sup> D.24-05-003 at 19-20, Conclusion of Law 11(a), (e).

<sup>96</sup> Staff Proposal at 7.

before shipment and add the FURS phone number directly to each device.<sup>97</sup> This eliminates the need to text each participant and ensures the number is saved on the phone. Staff explain that in addition to preloading the FURS number, FY Program participants should receive a reminder in their welcome letters that FURS is available and that the number is saved in their contacts.<sup>98</sup>

Verizon takes no position on removing the requirement to text the FURS number but notes it has already been coordinating with the FY Program Administrator to pre-load devices with the FURS number before shipment.<sup>99</sup>

We are persuaded to remove the requirement to text the FURS number upon device activation and replace it with a requirement to preload the number onto each device. The requirements for digital literacy materials will include information that FURS is available and the number is saved in participants' contacts. As such, we modify Conclusion of Law 11(a) and (e) in D.24-05-003 as follows:

**1011(a).** The FY Program Administrator will create digital literacy materials, which will include ~~instructions on how to add the FURS foster care crisis hotline number to the contacts list.~~

**1011(e).** The FY Program Administrator will **coordinate with the Service Provider to ensure that the FURS crisis hotline number is preloaded onto each device prior to shipment**~~text each participant the FURS crisis hotline number upon activation of service.~~

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<sup>97</sup> *Ibid.*

<sup>98</sup> *Ibid.*

<sup>99</sup> Verizon Opening Comments at 6.



#### **4. Summary of Public Comment**

Rule 1.18 allows any member of the public to submit written comment in any Commission proceeding using the “Public Comment” tab of the online Docket Card for that proceeding on the Commission’s website. Rule 1.18(b) requires that relevant written comment submitted in a proceeding be summarized in the final decision issued in that proceeding. No public comments have been received related to the Petition.

#### **5. Conclusion**

In response to the recommendations of YLC, TURN, Verizon, and the Staff Proposal, we find good cause to modify D.24-05-003. The proceeding remains open.

#### **6. Comments on Proposed Decision**

The proposed decision of Commissioner Alice Reynolds in this matter was mailed to the parties in accordance with Section 311 of the Public Utilities Code and comments were allowed under Rule 14.3 of the Commission’s Rules of Practice and Procedure. Opening comments were filed on September 29, 2025, by TURN, Verizon, and YLC, and reply comments were filed on October 6, 2025, by TURN and Verizon.

TURN recommends that we clarify the waiver of the one-per-household rule to extend it to the general California LifeLine program.<sup>100</sup> Similarly, YLC recommends extending the one-per-household waiver to situations where the FY Program participant is reunified in the same household as a California LifeLine

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<sup>100</sup> TURN Opening Comments on Proposed Decision at 2-3.

program participant.<sup>101</sup> Verizon supports TURN's and YLC's recommendations in their reply comments.<sup>102</sup> We decline to adopt these recommendations. The Moore Act limits California LifeLine to one per household.<sup>103</sup> Through this decision, we can waive the Moore Act's one-per-household rule for the duration of the FY Pilot because the waiver applies to a *pilot*. However, we cannot waive the statutory requirement for California LifeLine because it is a *permanent* program.

YLC also made two other recommendations. First, it recommends that the Commission create and rely upon an attestation form that can be used to verify FY Program eligibility if the county liaison does not act on an application within 21 days.<sup>104</sup> According to YLC, significant disparities in agency resources, funding, and staff across California's 58 counties have already created a backlog of applications awaiting approval.<sup>105</sup> While we recognize YLC's point, we are also concerned that allowing an attestation may make the FY Program vulnerable to waste, fraud, and abuse. As such, we have incorporated an alternative pathway into this decision that allows the California Office of the Foster Youth Ombudsperson to verify eligibility after 21 days and authorized Communications Division staff to make further modifications through the Commission's resolution process, if necessary. Foster youth also maintain the

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<sup>101</sup> YLC Opening Comments on Proposed Decision at 5-6.

<sup>102</sup> Verizon Reply Comments on Proposed Decision at 2-3.

<sup>103</sup> Pub. Util. Code Section 878.

<sup>104</sup> YLC Opening Comments on Proposed Decision at 2.

<sup>105</sup> *Id.* at 3.

option to provide a verification letter from the Ombudsperson Office at the time they submit their application.

Second, YLC recommends that the Commission require the FY Program Administrator to send a notification to the caregiver or caseworker listed on the application, rather than sending an application to the caregiver for a two-day review period.<sup>106</sup> YLC expresses concern that caregiver review will create confusion by (1) giving caregivers, foster youth, and members of a youth's care team the false impression that the caregiver has authority to approve or deny an application, and (2) creating confusion when it is not clear who the caregiver is.<sup>107</sup> To address YLC's concerns, we clarified in this decision that caregivers will receive the application for a two-day "information review period," which does not bestow on them the right to approve or deny the application.

Finally, Verizon recommends that the Commission clarify that the non-usage rule will not result in any de-enrollment until 91 days after it takes effect on March 1, 2026.<sup>108</sup> We have incorporated Verizon's recommended modifications to Conclusions of Law 17 and 18 in this decision.

## **7. Assignment of Proceeding**

Alice Reynolds is the assigned Commissioner and Robyn Purchia is the assigned Administrative Law Judge in this proceeding.

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<sup>106</sup> *Id.* at 4; *see also* TURN Reply Comments on Proposed Decision at 1 (supporting YLC's recommendation to replace caretaker signature with caretaker notification).

<sup>107</sup> YLC Opening Comments on Proposed Decision at 4.

<sup>108</sup> Verizon Opening Comments on Proposed Decision at 2-4; TURN Reply Comments on Proposed Decision at 3 (supporting Verizon's proposed clarification regarding device replacement and non-usage).

## **Findings of Fact**

1. D.24-05-003 established the FY Program and Foster Youth Pilot as part of the California LifeLine Program with specific eligibility criteria for the FY Program.

2. Pub. Util. Code Section 1708 authorizes the Commission to modify D.24-05-003 after providing proper notice to the parties and an opportunity to be heard.

3. Rule 16.4 requires petitioners to file and serve a petition for modification within one year of the effective date of the decision.

4. YLC's petition to modify D.24-05-003, filed on February 24, 2025, complies with the procedural requirements of Rule 16.4.

5. Good cause exists to modify D.24-05-003.

6. Strict application of the one-per-household rule may result in disqualification of otherwise eligible FY from accessing LifeLine services.

7. Waiving the one-per-household limit for the duration of the FY Pilot ensures foster youth have access to essential communications services.

8. Replacing "Authorized Applicant," within "Authorized Representative," as defined in Title 22 of the California Code of Regulations, section 89201(a)(7) where the Authorized Representative must sign a foster youth minor's application, may submit applications on behalf of foster youth, and serve as a point of contact for the FY Program Administrator when there are anomalies in an application, will enable a broader number of individuals to assist applicants to the FY Program.

9. Establishing a 90-day non-usage rule balances the needs of the FY Program with the need to steward FY Program funds.

10. The general California LifeLine program relies on the definition of “usage” in General Order 153, Section 5.7.1.1.

### **Conclusions of Law**

1. It is reasonable to modify the Conclusions of Law in D.24-05-003 as follows:

- (a) 1(a). A participant must be ~~either (i) a current or former foster youth or non-minor dependent between 13-20 years old and their 18<sup>th</sup> birthday, or (ii) a non-minor in extended foster care between 18 years old and their 21<sup>st</sup> birthday~~ **of age, who was in foster care or extended foster care at any time on or after their 13th birthday. Upon turning 18, the youth should be given the option to transition to the general California LifeLine program.**
- (b) 1(b). ~~All applicants must provide a ward of court or a county dependency letter~~ **The FY Program Administrator must verify that applicants were in foster care on or after their 13th birthday. Acceptable verification may include county verification through the FY Program Administrator’s customer portal or an established database match, such as CWS/CMS or CARES. If the county verification process exceeds 21 calendar days, the FY Program Administrator is permitted to validate eligibility with a verification letter from the California Office of the Foster Care Ombudsperson. Staff have discretion to authorize other methods of validation through the Commission’s resolution process.**
- (c) 1(c). A foster youth minor must provide signatures from an Authorized ~~Applicant~~ **Representative** on their application.
- (d) 1(d). A non-minor participant may continue to receive Foster Youth Program services for 6 months after they ~~leave foster care or turn 21 years old.~~

- (e) 4(e). When it finds anomalies in an application, the FY Program Administrator will contact the Authorized ~~Applicant~~ **Representative** and the county child welfare agency to verify the accuracy of the information provided in the application.
- (f) 4(f). Authorized ~~Applicants~~ **Representatives** may submit applications on behalf of minor foster youth, with the signature of the foster youth.
- (g) 4(g). Non-minor foster youth may independently submit **and sign** applications, or ~~easeworkers~~ **county child welfare agencies** may submit applications on behalf of non-minor **and minor** foster youth, with the ~~signature~~ **consent** of the foster youth.
- (h) ~~6. If a county child welfare agency informs the FY Program Administrator that a Foster Youth Program participant is no longer a ward of the court or county dependent, the FY Program Administrator should contact the participant.~~
- (i) ~~67. If the county child welfare agency informs the FY Program Administrator that a non-minor is no longer in foster care~~ **Once a youth** ~~or has turned 21 years old, it is reasonable to require then the FY Program Administrator should to~~ send text messages to inform the foster youth (a) that program services will end in six months, and (b) how to apply for the general California LifeLine program.
- (j) ~~1011(a). The FY Program Administrator will create digital literacy materials, which will include instructions on how to add the FURS foster care crisis hotline number to the contacts list.~~
- (k) 1011(e). The FY Program Administrator will **coordinate with the Service Provider to ensure that the FURS crisis hotline number is preloaded onto each device prior to shipment** ~~text each participant the FURS crisis hotline number upon activation of service.~~
- (l) ~~1213.~~ It is reasonable to establish the following suspension of service provision for the Foster Youth Pilot: if the FY Program Administrator receives notice of a court order to suspend communications services for more than ~~120~~ 90 days, then it will direct the service provider to terminate program services for the participant, **and the youth may**

**reapply after the suspension period ends or once the court order has been removed, whichever occurs first.**

- (m) **1314(a).** All iFoster Pilot participants (as of May 15, 2024) should be deemed eligible to participate in the new Foster Youth Pilot and Foster Youth Program until ~~May 14~~ **December 31, 2025**, and should be automatically transitioned to the new Foster Youth Pilot and Foster Youth Program unless they opt out.

2. It is reasonable to waive the one-per-household rule for the duration of the FY Pilot by adding Conclusion of Law number 16 to D.24-05-003 as follows:

- (a) **16. It is reasonable and consistent with the public interest to waive the one-per-household limitation for the duration of the FY Pilot to allow multiple eligible foster youths residing at the same address, including those placed together following family reunification, to receive program benefits.**

3. It is reasonable to adopt a non-usage rule, notice, and termination requirements by adding Conclusions of Law numbers 17, 18, 19, and 20 to D.24-05-003 as follows:

- (a) **17. Effective March 1, 2026, it is reasonable to establish and commence tracking of foster youth participants' usage to implement a 90-day non-usage rule to allow sufficient time for the FY Program Administrator to contact the foster youth to notify them about the non-usage. Upon identifying that a youth has not used their program-issued phone for 30-days, the FY Program Administrator should send text and (where applicable) email notifications on days 30, 60, and 75 to advise the youth that they will lose service if they do not use their phone before the 90-day window. The notifications should inform the foster youth on how to request a replacement phone in case the youth no longer have access to their phone.**
- (b) **18. It is reasonable for the FY Program Administrator to ensure the foster youth participant has not requested replacement equipment in the 90 days prior to the scheduled date for disconnecting the**

**participant's service for non-usage. For youth participants not de-enrolled based upon a recent request for a replacement device, such youth shall have an additional 90 days from the date the request for the replacement device was fulfilled or denied to use their device or be subject to de-enrollment.**

- (c) 19. It is reasonable for the FY Program Administrator to assume the youth no longer has their phone if the youth does not use their phone by day 90 and they do not have a pending request for equipment replacement. As such, it is reasonable for the FY Program Administrator to work with the service provider to terminate service on day 91.**
- (d) 20. It is reasonable to require the FY Program Administrator to retain the foster youth's information for at least six months after termination of service for non-usage to facilitate streamlined re-enrollment.**

4. It is reasonable to adopt a modified version of the general California LifeLine program's definition of "usage" in General Order 153, Section 5.7.1.1 by adding Conclusion of Law number 21 to D.24-05-003 as follows:

- (a) 21. It is reasonable to adopt a modified version of the general California LifeLine Program's definition of "usage" for the FY Program. The modification extends the non-usage period from 30 days to 90 days..**

5. It is reasonable to authorize the Communications Division staff to revise the FY Pilot and FY Program as necessary to streamline eligibility determinations and reduce waste, fraud, and abuse by adding Conclusion of Law number 22 to D.24-05-003 as follows:

- (a) 22. It is reasonable to authorize staff to propose revisions to the FY Pilot and FY Program through the Commission's resolution process, in particular as it relates to strategies to streamline FY Program eligibility determinations and reduce waste, fraud, and abuse.**



## O R D E R

IT IS ORDERED that:

1. Conclusions of Law in Decision 24-05-003 shall be modified as follows:
  - (a) 1(a). A participant must be ~~either (i) a current or former foster youth or non-minor dependent between 13-20 years old and their 18<sup>th</sup> birthday, or (ii) a non-minor in extended foster care between 18 years old and their 21<sup>st</sup> birthday of age, who was in foster care or extended foster care at any time on or after their 13<sup>th</sup> birthday.~~ Upon turning 18, the youth should be given the option to transition to the general California LifeLine program.
  - (b) 1(b). All applicants must provide a ward of court or a county dependency letter. ~~The FY Program Administrator must verify that applicants were in foster care on or after their 13th birthday.~~ Acceptable verification may include county verification through the FY Program Administrator's customer portal or an established database match, such as CWS/CMS or CARES. If the county verification process exceeds 21 calendar days, the FY Program Administrator is permitted to validate eligibility with a verification letter from the California Office of the Foster Care Ombudsperson. Staff have discretion to authorize other methods of validation through the Commission's resolution process.
  - (c) 1(c). A foster youth minor must provide signatures from an Authorized Applicant **Representative** on their application.
  - (d) 1(d). A non-minor participant may continue to receive Foster Youth Program services for 6 months after they leave foster care or turn 21 years old.
  - (e) 4(e). When it finds anomalies in an application, the FY Program Administrator will contact the Authorized Applicant **Representative** and the county child welfare agency to verify the accuracy of the information provided in the application.
  - (f) 4(f). Authorized Applicants **Representatives** may submit applications on behalf of minor foster youth, with the signature of the foster youth.

- (g) 4(g). Non-minor foster youth may independently submit **and sign** applications, or caseworkers **county child welfare agencies** may submit applications on behalf of non-minor **and minor** foster youth, with the ~~signature~~**consent** of the foster youth.
- (h) ~~6. If a county child welfare agency informs the FY Program Administrator that a Foster Youth Program participant is no longer a ward of the court or county dependent, the FY Program Administrator should contact the participant.~~
- (i) ~~67. If the county child welfare agency informs the FY Program Administrator that a non-minor is no longer in foster care~~ **Once a youth** ~~or has turned 21 years old, it is reasonable to require then the FY Program Administrator should to~~ send text messages to inform the foster youth (a) that program services will end in six months, and (b) how to apply for the general California LifeLine program.
- (j) ~~1011(a). The FY Program Administrator will create digital literacy materials, which will include instructions on how to add the FURS foster care crisis hotline number to the contacts list.~~
- (k) ~~1011(e). The FY Program Administrator will~~ **coordinate with the Service Provider to ensure that the FURS crisis hotline number is preloaded onto each device prior to shipment** ~~text each participant the FURS crisis hotline number upon activation of service.~~
- (l) ~~1213. It is reasonable to establish the following suspension of service provision for the Foster Youth Pilot: if the FY Program Administrator receives notice of a court order to suspend communications services for more than 120-90 days, then it will direct the service provider to terminate program services for the participant, and the youth may reapply after the suspension period ends or once the court order has been removed, whichever occurs first.~~
- (m) ~~1314(a). All iFoster Pilot participants (as of May 15, 2024) should be deemed eligible to participate in the new Foster Youth Pilot and Foster Youth Program until May 14-~~ **December 31, 2025**, and should be automatically transitioned to the new Foster Youth Pilot and Foster Youth Program unless they opt out.

2. Conclusions of Law shall be added to Decision 24-05-003 as follows:

- (a) **16. It is reasonable and consistent with the public interest to waive the one-per-household limitation for the duration of the FY Pilot to allow multiple eligible foster youths residing at the same address, including those placed together following family reunification, to receive program benefits.**
- (b) **17. Effective March 1, 2026, it is reasonable to establish and commence tracking of foster youth participants' usage to implement a 90-day non-usage rule to allow sufficient time for the FY Program Administrator to contact the foster youth to notify them about the non-usage. Upon identifying that a youth has not used their program-issued phone for 30-days, the FY Program Administrator should send text and (where applicable) email notifications on days 30, 60, and 75 to advise the youth that they will lose service if they do not use their phone before the 90-day window. The notifications should inform the foster youth on how to request a replacement phone in case the youth no longer have access to their phone.**
- (c) **18. It is reasonable for the FY Program Administrator to ensure the foster youth participant has not requested replacement equipment in the 90 days prior to the scheduled date for disconnecting the participant's service for non-usage. For youth participants not de-enrolled based upon a recent request for a replacement device, such youth shall have an additional 90 days from the date the request for the replacement device was fulfilled or denied to use their device or be subject to de-enrollment.**
- (d) **19. It is reasonable for the FY Program Administrator to assume the youth no longer has their phone if the youth does not use their phone by day 90 and they do not have a pending request for equipment replacement. As such, it is reasonable for the FY Program Administrator to work with the service provider to terminate service on day 91.**
- (e) **20. It is reasonable to require the FY Program Administrator to retain the foster youth's information for at least six months after**

**termination of service for non-usage to facilitate streamlined re-enrollment.**

**(f) 21. It is reasonable to adopt a modified version of the general California LifeLine Program’s definition of “usage” for the FY Program. The modification extends the non-usage period from 30 days to 90 days.**

**(g) 22. It is reasonable to authorize staff to propose revisions to the FY Pilot and FY Program through the Commission’s resolution process, in particular as it relates to strategies to streamline FY Program eligibility determinations and reduce waste, fraud, and abuse.**

3. Rulemaking 20-02-008 shall remain open.

This order is effective today.

Dated October 9, 2025, at Bellflower, California

ALICE REYNOLDS

President

DARCIE L. HOUCK

JOHN REYNOLDS

KAREN DOUGLAS

Commissioners

Commissioner Matthew Baker recused himself from this agenda item and was not part of the quorum in its consideration.