

Protest of The Utility Reform Network and The
Greenlining Institute of iFoster Advice Letters Nos. 1
& 1-A.

PROTEST

March 6, 2023

Telecommunications Advice Letter Coordinator
Communications Division
California Public Utilities Commission
505 Van Ness Avenue
San Francisco, CA 94102
TD._PAL@cpuc.ca.gov

**RE: Protest of The Utility Reform Network and The Greenlining Institute of
iFoster Advice Letters No. 1 and No. 1-A.**

I. INTRODUCTION

Pursuant to Rule 7.4 of the California Public Utilities Commission's (Commission) General Order (GO) 96-B, The Utility Reform Network (TURN) and The Greenlining Institute (GLI) respectfully submit this protest of iFoster Inc. (iFoster)'s Advice Letter No. 1 (AL No. 1)¹ and Advice Letter No. 1-A (AL No. 1-A)² (collectively, Advice Letters).

In Decision 23-01-003 (Decision),³ the Commission extended the Foster Youth Pilot (Pilot) for an additional 18 months, subject to certain program modifications and reporting conditions. Specifically, the Decision orders iFoster to file a Tier 2 Advice Letter that includes the following:

¹ On February 13, 2023, iFoster filed its AL No. 1 pursuant to Ordering Paragraph (OP) 5 of Decision (D).23-01-003 (Decision). *See*, Decision 23-01-003 at OP 5. GO 96-B, Rule 7.4.1 sets the due date of protest as “[w]ithin 20 days of the date of submittal of the advice letter.” The 20th day being a Sunday, TURN and GLI submit this protest on the following business day. *See*, Rule 1.15 of the Commission's Rules of Practice and Procedure (setting computation of time). Therefore, TURN and GLI' protest is timely.

² On February 28, 2023, iFoster filed a supplemental advice letter in response to a “request of the Communications Division staff.” *See*, iFoster AL No. 1-A at 1. GO 96-B, Rule 7.4.1 sets the due date of protest as “[w]ithin 20 days of the date of submittal of the advice letter.” Therefore, TURN and GLI' protest is timely.

³ All decisions refer to decisions made in Rulemaking 20-02-008 unless otherwise stated.

- (i) a proposed budget for each calendar quarter between January 1, 2023 through July 31, 2024, with a line item for each category of program administration activity and program costs, and
- (ii) a summary of actual expenditures between October 1, 2022 and December 31, 2022, with a line item for each category of program administration activity and program cost.

However, iFoster's Advice Letters contain material errors and omissions and do not comply with the Commission's order. Therefore, approving the iFoster Advice Letters with a budget based on this incomplete information would be unjust and unreasonable. As discussed further below, those substantial errors and omissions are as follows:

- (i) The Commission requires that iFoster provide a proposed budget for each calendar quarter between January 1, 2023 through July 31, 2024, with a line item for each category of program administration activity and program costs.
 - 1. iFoster adds unauthorized expenditures in new budget categories;
 - 2. iFoster failed to provide a budget for January 2023;
 - 3. iFoster failed to adequately define and provide line items for each specific category of program administration activity;
 - 4. iFoster failed to adequately define and provide line items for each specific category of program costs; and
 - 5. iFoster failed to provide categories of administrative and program costs that align with existing, specific categories of administrative and program costs.
- (ii) The Commission requires that iFoster provide a summary of actual expenditures between October 1, 2022 and December 31, 2022, with a line item for each category of program administration activity and program cost.
 - 1. iFoster failed to provide the actual expenditures for the period between October 2022 to December 2022;
 - 2. iFoster failed to define and provide line items for each specific category of program administration activity;
 - 3. iFoster failed to define and provide line items for each specific category of program costs; and
 - 4. iFoster failed to provide categories of administrative and program costs that align with existing, specific administrative and program cost categories.

Therefore, TURN and GLI protest iFoster's Advice Letters and respectfully recommend that the Communications Division request iFoster provide the necessary corrections and omitted information identified by TURN and GLI, as discussed below. Further, the Communications Division should seek further clarifying information to ensure iFoster revises its proposed budget to comply with the Commission's order.

II. BACKGROUND

TURN and GLI continue to support the concept of the Foster Youth Pilot, which the Commission initially approved in early 2019.⁴ For nearly four years, iFoster has been the Administrator of the Pilot. Throughout the Pilot's duration, iFoster sought and the Commission approved resolutions and decisions to allocate additional funding for various Pilot-related activities.⁵ However, the Commission has now twice extended the Foster Youth Pilot, and each time has declined to increase the Pilot's overall budget.⁶ Instead, the Commission required iFoster to provide the above-mentioned budget information as "additional safeguards . . . to protect the ratepayer interest."⁷

Unfortunately, iFoster's Advice Letters include substantial errors and omissions, and therefore cannot be relied upon to safeguard ratepayer interests.⁸

III. GROUNDS FOR PROTEST

General Order 96-B, Rule 7.4.2, enumerates the grounds on which an entity may protest an advice letter.⁹ Among them, a protest may be based on the grounds that "[t]he analysis . . . in the advice letter contain material . . . omissions,"¹⁰ "[t]he relief requested in the advice letter would violate statute or Commission order . . .,"¹¹ and "[t]he relief requested in the advice letter is unjust [or] unreasonable . . . provided that such a protest may not be made where it would

⁴ See, Decision 19-04-021 (R.11-03-013) at 37. While the Commission approved the Foster Youth Pilot in May 2019, it was not launched for another six months, in November 2019.

⁵ See generally, Resolution T-17683 (issued Feb. 27, 2020) (approving \$539,247 of CASF Adoption Account funds for the Foster Youth Pilot to conduct digital literacy); Resolution T-17700 (issued Jun. 11, 2020) (approving \$500,000 in additional funding for Foster Youth Pilot phone distribution expenses); Decision 20-11-006 (modifying the Foster Youth Pilot plans in response to the global coronavirus pandemic); Decision 21-07-008 (extending the Foster Youth Pilot through January 31, 2023).

⁶ See, Decision 21-07-008 at COL 2; Decision 23-01-003 at COL 1.

⁷ See, Decision 23-01-003 at 70.

⁸ In comments on the 18-month extension, TURN and GLI argued that extension of the Pilot could entrench path dependencies that impact not just the Pilot for the period covered by the requested extensions but the permanent successor program as well. See, TURN & GLI Opening Comments ALJ Ruling Requesting Comments on Extension of Foster Youth Pilot Program at 10. Path dependencies, or the way in which past events or decisions can constrain later events or decisions, set during the Pilot can greatly influence the design of the permanent successor program. The Commission agreed to incorporate this requirement based on TURN & GLI's recommendation that additional budget information would provide an additional safeguard of ratepayer interest and advance pilot program transparency. See, Decision 23-01-003 at 7.

⁹ GO 96-B, Rule 7.4.1.

¹⁰ GO 96-B, Rule 7.4.2(3).

¹¹ GO 96-B, Rule 7.4.2(2).

require relitigating a prior order of the Commission.”¹² TURN and GLI protest iFoster's Advice Letters on these grounds.¹³

IV. DISCUSSION

For each of the two reporting requirements, TURN and GLI discuss how iFoster's Advice Letters contain material errors and omissions, fail to comply with the Decision, and request unjust and unreasonable relief. Therefore, TURN and GLI respectfully request for the Communications Division to require iFoster to revise its Advice Letter pursuant to the Commission's order. TURN and GLI suggest for the Communications Division to ensure the revised advice letter addresses all TURN and GLI's concerns, gather more clarifying and comparable information from iFoster, and bring iFoster's actual and proposed budgets into compliance with the Decision.

A. Proposed Budget for January 2023 through July 2024.

1. iFoster adds unauthorized expenditures in new budget categories.

iFoster's Advice Letters unjustly seek to include new budget categories and unauthorized expenditures in violation of Decision 23-01-003 (Decision). The Decision authorizes Communications Division to “approve . . . foster youth pilot program expenditures within the total budget authorized in Decision 19-04-021 without limitation for specific budget categories.”¹⁴ The authorized budget categories include “monthly service plan costs, phone devices, device setup, distribution, and pilot administration.”¹⁵ The Decision does not authorize iFoster to propose or request reimbursement for expenditures that were not previously authorized within the Pilot's specific budget categories.

Communications Division should not approve a budget for or reimburse expenditures that are outside the scope of the Foster Youth Pilot's expenditures and specific budget categories as authorized in Decision 19-04-021. For example, iFoster proposes to make bulk purchases of charging blocks, hard cases, and screen protectors under a newly proposed “Hardware” category.¹⁶ As an initial matter, Decision 23-01-003 authorizes expenditures for “phone devices,”¹⁷ it does not authorize expenditures on phone accessories nor the creation of new

¹² GO 96-B, Rule 7.4.2(6).

¹³ As directed in Rule 7.4.2(6), TURN and GLI's protest does not require the Commission to relitigate a prior Commission order. Instead, this protest merely recommends the Commission enforce a Decision's minimum requirements.

¹⁴ Decision 23-01-003 at 10, OP 2.

¹⁵ *Id.* at 6.

¹⁶ *See*, AL No. 1-A, Attach. A, at 4.

¹⁷ Decision 23-01-003 at 6.

budget category like "Hardware" for expenditures in other types of equipment or accessories. More importantly, iFoster's Advice Letter No. 1-A budgets for these costs when the Pilot does not permit these accessories' costs. iFoster first refers to planned bulk purchases and provides a projected monthly budget for these expenditures¹⁸ but also notes that "T-Mobile will add the charging blocks and cases with protective screens . . . at no extra charge."¹⁹ Therefore, these costs should not be included in the Pilot's proposed budget because the Pilot will not incur any costs for these accessories.

Additionally, the Communications Division should seek further clarity within existing budget categories proposed in the iFoster Advice Letters. For example, iFoster refers to a \$29 monthly service plan in its proposed budget which is based on negotiations under its "National Contract" with T-Mobile.²⁰ However, the Commission has only authorized reimbursement of up to \$25 per month for a service plan.²¹ The Decision does not permit iFoster, nor has the Decision delegated authority to the Communications Division, to unilaterally change the authorized monthly service plan amount.²² Therefore, the Communications Division should not approve an advice letter that includes a proposed budget with reimbursement for a service plan that exceed the Commission's authorized monthly service plan amount.

In another example, the iFoster Advice Letters propose a "Marketing and Outreach"²³ category that includes "other programming including [iFoster's] robust internship program of peer resource navigators" as well as bi-weekly²⁴ workshops.²⁵ As described, this internship

¹⁸ See, AL No. 1-A, Attach. A, at Tbl 4.

¹⁹ See, *id.*, at 4 (emphasis added).

²⁰ Incongruously, iFoster's Advice Letters maintains that it seeks no change in the Pilot service offering to participants. See, AL No. 1 at 1; AL No. 1-A at 1.

²¹ Compare, AL No. 1-A, Attach. A, at 4 (stating, "iFoster has negotiated a monthly service plan of \$29"), with Decision 21-07-008 at Ordering Paragraph 2 (authorizing "a monthly service plan subsidy of up to \$25 per participant"). While this change in service plan may be reasonable, it exceeds the monthly subsidy authorized by a Commission decision and would require a subsequent Commission decision to authorize the increase subsidy amount. Until, the budget should only include the maximum monthly subsidy authorized by the Commission, and iFoster will need to address the deficit using non-ratepayer funds.

²² See, *e.g., id.*, at 6 ("iFoster *has* negotiated a National Service Contract with T-Mobile which will include this pilot extension") (emphasis added).

²³ iFoster also proposes a "Participant Phone Audit and Fiscal Control" category without attribution to a specified budget category.

²⁴ iFoster does not clarify whether it means to host workshops twice a week or every two weeks. See, "Biweekly," Merriam-Webster, available at <https://www.merriam-webster.com/dictionary/biweekly> (simultaneously defining "biweekly" as "occurring every two weeks" and "occurring twice a week"). TURN and GLI do not opine on the reasonableness of iFoster hosting workshops as frequently as every two weeks, as this is an activity outside the scope of the Foster Youth Pilot.

²⁵ See, AL No. 1-A, Attach. A, at 2.

program is unrelated to the Pilot and appears to be a new—and unauthorized—proposed budget expense. iFoster acknowledges that the internship program has a separate funding source. However, iFoster seeks California LifeLine ratepayer funding for this programming if such programming exceeds the budget from iFoster's other funding source for its internship activities.²⁶ The Decision did not authorize non-Pilot expenses. Therefore, the Communications Division should not approve a proposed budget seeking reimbursement for these non-Pilot activities.

Furthermore, iFoster seeks a one-time, \$200,000 payment to build a customer relationship management (CRM) database for auditing monthly T-Mobile reports and staff time for this purpose.²⁷ iFoster provides insufficient detail about how or why this additional expense is necessary now given its preexisting reporting requirements and program administrator duties. Moreover, T-Mobile has provided enrollment data to iFoster, the Communications Division, and stakeholders as an Excel spreadsheet. iFoster does not sufficiently explain why it needs a CRM database to gather the Excel spreadsheets from T-Mobile and provide those same Excel spreadsheets as a part of iFoster's reporting requirement.²⁸ Furthermore, creating a CRM database is an expense not previously authorized by a Commission decision. Therefore, the Communications Division should not approve a proposed budget with this expense.

Additionally, iFoster's unauthorized expenses under new budget categories it was not further authorized to create further hinder the Communications Division's consideration of the proposed budget. For example, program administrative activities and costs, like outreach, marketing and auditing the line items that were removed from specific budget categories, would more than double (or a nearly 112 percent increase) the Pilot's administrative costs from the prior budget. However, grouping expenditures under these newly proposed and unauthorized budget categories results in iFoster's claim that administrative costs are expected to only increase by 15 percent²⁹

Above, TURN and GLI do not provide a comprehensive, line-by-line critique of every activity or expenditure proposed by iFoster but highlight the most egregious errors or omissions. In summary, the Decision only authorized the movement of funds within the existing, specific Pilot budget categories; the Decision did not authorize iFoster to add new expenditures to the

²⁶ *See, id.*, at 3 (explaining that “[o]nly expenses not already covered under the internship program will be charged to the CPUC Program”). This explanation is insufficient to explain what proportion of these activities would be or has been used to promote awareness of the Pilot and appears to suggest that the Pilot would be assessed for the remainder of unaccounted-for expenditures instead of actual time or resources on account of Pilot-related activities.

²⁷ *See, id.* at 3, 6 & Tbl 3.

²⁸ It is also unclear how iFoster, as the Foster Youth Pilot program administrator, has been reviewing the T-Mobile subscribership and usage data to date if it feels it now needs a CRM database to do so. Relatedly, it is unclear what tools iFoster has been using to administer the Pilot if it has not used a CRM database or equivalent over the last four years.

²⁹ *See, AL No. 1-A, Attach. A, at 3.*

Pilot that are outside of the Commission's approved expenditures and specific budget categories. The Communications Division should not approve a proposed budget with these unauthorized and non-Pilot expenses.

2. iFoster failed to provide a budget for January 2023.

iFoster omits budget information for January 2023.³⁰ Decision 23-01-003, OP 5 requires iFoster to submit quarterly budget projections from January 1, 2023 to July 31, 2024. However, iFoster excludes any line items for January 2023, actual or projected. Therefore, TURN and GLI protest iFoster's Advice Letters as containing a material omission and because they violate Decision 23-01-003, Ordering Paragraph 5.

Given the lack of data available in the record concerning actual monthly or quarterly expenditures by line item, omitting even a single month of actual or proposed budget information can impair the Communications Division's assessment and ability to protect ratepayer interest. Not only did the Commission expressly request information from this range, but it is consistent with the Commission's intent to collect one contiguous range of actual budget expenditures from the last quarter of 2022 through to the proposed budget expenditures. The actual expenditures permit the Communications Division to establish a baseline to determine if the proposed expenditures are reasonable.

If the information was omitted due to the timing of the Decision, such a result is an unreasonable reading of the Decision. While OP 5 does not expressly require iFoster to substitute actual expenditures in place of projected expenditures, this is within the spirit of the Decision to do so. Accordingly, if iFoster was reimbursed, or intends to seek reimbursement, for January 2023 expenditures, then iFoster should have provided those expenditures in its Advice Letters, whether it seeks a change to that budget period or not.

3. iFoster failed to adequately define and provide line items for each category of program administration activity.

iFoster omits adequate definitions necessary to assess and compare the line items in its proposed budget to prior expenditures, including in the actual expenditures provided in its Advice Letters and specific budget categories defined by Pilot decisions.

For example, in AL No. 1, iFoster provides definitions for data elements for the monthly service list reporting requirement,³¹ but does not define each of the line-item categories for the actual and proposed budgets. In AL No. 1-A, iFoster provides some narrative regarding the line items in AL No. 1-A, but this is still unclear. Therefore, this lack of clarity frustrates the ability to compare prior expenditures to the proposed budget.

³⁰ See, AL No. 1, Attach. A, at 4.

³¹ See, *id.* at 3-4.

For another example, iFoster's Advice Letter categories do not readily compare to line items in previously published budgets: Operations, Distribution, and Devices.³² The conflation between "roles" and budget categories further complicates comparisons to previously published budgets. This prevents the Communications Division from establishing baselines, assessing and projecting trends based on actual expenditures, and how those trends would inform the projected program performance and thus reasonableness of iFoster's proposed budget.

In addition, the Advice Letters are unclear about what is included under the "Administration" category in the proposed budget³³ despite the Decision's requirement that iFoster report program administration activity line items. iFoster's Advice Letters provide a vague discussion that its administrative cost should decline because it has improved its processes over the last four years.³⁴ However, the proposed budget does not reflect any administrative cost savings and instead reflects administrative cost increases.³⁵ Therefore, the Commission should seek clarity regarding the definitions of each line-item expense and align those expenses with specific Pilot budget categories to have confidence that the Pilot is receiving the benefits of any cost efficiencies.³⁶

4. iFoster failed to adequately define and provide line items for each category of program costs.

iFoster's Advice Letters omit adequate definitions to assess and compare the line items in its proposed budget to existing, specific budget categories. iFoster does not define each of the line-item categories for the actual and proposed budgets in its AL No. 1. iFoster provides some narrative regarding the line items in AL No. 1-A, but this is still unclear. For example, the Advice Letters are unclear about what is included under "Program Cost" category in association with program administrative activity in the proposed budgets. For another example, iFoster's

³² See, e.g., ALJ Ruling Requesting Comments on Extension of Foster Youth Pilot Program, Staff Proposal at 12, Tbl 4 (R.20-02-008) (Oct. 5, 2022) (stating the budget categories for the Foster Youth Pilot).

³³ Categories and expenditures that might be included in the administration category appear to either conflate "new roles and responsibilities" or simultaneously disaggregate administrative activities into new categories. See, AL No. 1-A, Attach. A, at 3.

³⁴ See AL No. 1, Attach. A, at 4 (stating, iFoster expect to have few Administrative expenses then previous because of "lessons learned in the true cost of implementing the program, while also leveraging the cost efficiencies . . . in terms of marketing and outreach in particular" and "some economies of scale achievable in program management")

³⁵ The proposed budget would represent an increase program costs, whether using TURN and GLI's estimated doubling mentioned above or iFoster's acknowledged 15 percent increase.

³⁶ The Communications Division may modify the reporting requirements by administrative letter (see Decision 23-01-003 at 11, OP 4) and should request monthly line-item expenditure information—that correlate with existing budget categories—dating back to the inception of the Pilot through present to evaluate the proposed budget and line-item expenses.

Advice Letter categories do not readily compare to line items in previously published budgets: Operations, Distribution, and Devices.³⁷

5. iFoster failed to provide categories of administrative and program costs that align with existing categories of administrative and program cost categories.

The Foster Youth Pilot has been ongoing for nearly four years and has established budget categories: Operations, Distribution, Devices, and Boost/T-Mobile Service.³⁸ However, in its Advice Letters, iFoster seemingly invents new categories that do not align with existing budget categories.

B. Actual Expenditures for October 2022 through December 2022.

1. iFoster failed to provide the actual expenditures for the period between October 2022 to December 2022.

iFoster acknowledges that it intentionally failed to comply with the Commission Decision when it completely omitted "Marketing and Outreach" line-item expenditures and partially omitted "Administration" line-item information for Q4 2022. iFoster states it disregarded the Commission's orders because iFoster's "expenditures for this period and for the entire extension exceeded the budget approved by [Commission] staff for [the pilot program's] expense categories."³⁹ However, this runs afoul the letter and intent of the Commission's order and the Communications Division should reject this argument.

Regardless of whether iFoster exceeded the prior budget, the Quarter 4 2022 actual expenditures provide essential information to assess the proposed budget for the Pilot's extension. The Decision is clear, OP 5 requested "actual expenditures" and not reimbursements sought from the Commission.⁴⁰ Actual expenditures represent valuable, practical implementation experience that not only informs this proposed budget extension but the future of the Pilot and any subsequent permanent program. For this reason, iFoster should provide its actual marketing, outreach, and administrative costs for these months to the Communications Division as well as indicate by how much these costs exceeded the prior budget line-item categories.

³⁷ See, e.g., ALJ Ruling Requesting Comments on Extension of Foster Youth Pilot Program, Staff Proposal at 12, Tbl 4 (R.20-02-008) (Oct. 5, 2022) (stating the budget categories for the Foster Youth Pilot).

³⁸ See, e.g., *id.*

³⁹ AL No. 1, Attach. A, at 2.

⁴⁰ See, Decision 23-01-003 at 11, OP 5.

2. iFoster failed to define and provide line items for each specific category of program administration activity.

iFoster omits crucial definitions in its Advice Letters to assess and compare the line items between its actual expenditures, specific budget categories, and proposed expenditures. iFoster does not define each of the line-item categories for the actual and proposed budgets in its AL No. 1 and its AL No. 1-A covers “only as to the extension period.”⁴¹ iFoster provides some narrative references to prior expenditures regarding expenditures for line-items in AL No. 1-A, but this is still unclear. For example, the Advice Letters are unclear about what is included under “Administrative” category in the actual expenditures, see discussion above. For another example, iFoster’s Advice Letter categories do not readily compare to line items in previously published budgets: Operations, Distribution, and Devices.⁴²

3. iFoster failed to define and provide line items for each specific category of program costs.

iFoster omits adequate definitions in its Advice Letters to assess and compare the line items between its actual expenditures, specific budget categories, and proposed categories and expenditures. iFoster provides some narrative regarding the line-items in AL No. 1-A, but this is still unclear. For example, the Advice Letters are unclear about what is included under “Program Cost” category in the actual expenditures. For another example, iFoster’s Advice Letter categories do not readily compare to line items in previously published budgets: Operations, Distribution, Devices.⁴³

4. iFoster failed to provide categories of administrative and program costs that align with existing, specific categories of administrative and program costs.

The Foster Youth Pilot has been ongoing for nearly four years and has established budget categories: Operations, Distribution, Devices, and Boost/ T-Mobile Service.⁴⁴ However, in its Advice Letters, iFoster seemingly invents new categories that do not align with existing, specific budget categories.

C. The Communications Division Should Seek Further Revision of iFoster’s Advice Letters and Request Additional Information from iFoster as its Currently Proposed Budget is Unjust and Unreasonable.

⁴¹ See, AL No. 1-A at 1.

⁴² See, e.g., ALJ Ruling Requesting Comments on Extension of Foster Youth Pilot Program, Staff Proposal at 12, Tbl 4 (R.20-02-008) (Oct. 5, 2022) (stating the budget categories for the Foster Youth Pilot).

⁴³ See, e.g., *id.*

⁴⁴ See, e.g., *id.*

The Communications Division should require iFoster to further supplement its Advice Letters to enable the Communications Division to appropriately consider iFoster's proposed use of ratepayer funds in a fiscally responsible manner. As discussed above, there are numerous errors and omissions identified by TURN and GLI, therefore iFoster's Advice Letters does not comply with the directive in Decision 23-01-003, Ordering Paragraph 5. Relatedly, this information is critical to approval of the proposed budget, the implementation of the Pilot extension, successor programs, and other future LifeLine pilots.⁴⁵ For this reason, the Communications Division should request a complete accounting of the information required of iFoster in OP 5. Further, the Communications Division should seek further clarifying and comparable information to ensure any revised budget comply with the Decision.

V. CONCLUSION

TURN and GLI respectfully recommend that the Communications Division require iFoster to fully comply with Decision 23-01-003, Ordering Paragraph 5 and address the errors and omissions as described above.

Please submit questions concerning this protest to Leo Fitzpatrick at lfitzpatrick@TURN.org.

Respectfully submitted,

/s/ Leo Fitzpatrick
Leo Fitzpatrick
Telecommunications Policy Analyst
The Utility Reform Network
785 Market Street, Suite 1400
San Francisco, CA 94103
(415) 929-8876
lfitzpatrick@turn.org

Authorized to sign on behalf of The
Greenlining Institute

cc: Harjeet.kumar@cpuc.ca.gov
Maria.valadez@cpuc.ca.gov

⁴⁵ See, Decision 18-12-019 (Rulemaking 11-03-013) at 17 (allowing pilot programs to consider permanent changes to the California LifeLine Program and requiring evaluation of the pilot throughout the pilot period to “analyze the data collected, identify best practices and lessons learned, and provide recommendations” from any approved pilots). See also, Decision 19-04-021 (Rulemaking 11-03-013) at 37 (noting iFoster proposed that the Foster Youth Pilot would “[p]rovide scalable solutions that the Program may adopt in the future”).