



iFoster Inc.
P.O. Box 159
Truckee, CA 96160

April 18, 2023

Via email: CALLADVICELETTER@cpuc.ca.gov

Mr. Robert Osborn
Director, Communications Division
California Public Utilities Commission
505 Van Ness Avenue, Third Floor
San Francisco, CA 94102

Re: iFoster Inc. Advice Letter 1-C with Further Clarifications

Dear Mr. Osborn:

Pursuant to Section 7.5.1 of General Order 96-B, iFoster Inc. ("iFoster") hereby submits this Supplemental Advice Letter No. ("AL") 1-C. The original iFoster AL 1 was filed on February 13, 2023, with a requested effective date of February 1, 2023. A supplemental iFoster AL 1-A was filed on February 28, 2023. AL 1-A provided further information on the February 2023 through July 2024 (Extension 2) program budget for the California LifeLine Foster Youth Pilot Program, as ordered under Commission Decision ("D.") 23-01-003, dated January 12, 2023 ("Extension Decision"). On April 12, iFoster filed AL 1-B in order to provide additional requested information to Communications Division (CD) Staff and clarifications to support and justify portions of the Extension 2 budget due to broadened responsibilities of iFoster under D.23-01-003. Today, iFoster files AL 1-C, to provide a revised budget and to provide some final information and clarifications requested by CD Staff.

In Attachment A, iFoster provides three clarifications: (1) agreements between iFoster and CD Staff on the Extension 2 Budget (attached as Attachment B); (2) an Administrative category clarification relating to the CRM system upgrade on certain data that will be provided, and (3) certain data to be shown by iFoster over a three month period to justify providing hard cases to the devices for device protection and reduction of breakage.

Attachment B is the updated budget. iFoster highlights that this revised budget uses the Extension 1 budget approved in AL 28 for February, March and April 2023, consistent with CD Staff permission as this AL 1 is pending approval.¹ Further, this updated budget reflects a revised participant forecast of 5,250 participants, due to the reduction in the proposed AL 1 marketing budget of 75% and an Admin increase of 15% for Extension 2. (The prior participant forecast was 11, 250.) iFoster commits that every effort will be made to achieve the new forecast of participants. This reduction in the participant forecast is reflected in hardware and service plan budgets, which are keyed to the revised participant forecast (5,250 participants).

¹ The Extension 1 period approved by AL 28 expired on January 31, 2023.



In compliance with G.O. 96-B, we hereby serve a copy of this AL 1-C via email upon the parties identified on the service list for Rulemaking No. 20-02-008 as of April 17, 2023, and the protesting parties.

Anyone may protest or respond to AL 1 which was filed on February 13, 2023, by sending a written protest or response via email to harjeet.kumar@cpuc.ca.gov and maria.valadez@cpuc.ca.gov at the Commission's Communications Division. If submitting a protest, the protest must set forth the specific grounds on which it is based, including supporting information or legal arguments. A protest or response to the advice letter must be submitted to the Communications Division within 20 days of the date the advice letter was filed and served on iFoster Inc. on the same day, at the contact information below.

Notices should be sent to:

Serita Cox
CEO, iFoster Inc.
PO Box 159
Truckee, CA 96160
Via email: serita@ifoster.org

Rachelle Chong
Law Office of Rachelle Chong
345 W. Portal Avenue, Ste. 110
San Francisco, CA 94127
rachelle@chonglaw.net
Its Outside Counsel

To obtain information about the CPUC's procedures for advice letters and protests, visit the CPUC's website at www.cpuc.ca.gov and look for the links to General Order 96-B.

iFoster respectfully requests that the Staff (1) grant iFoster AL 1, as supplemented by ALs 1-A, 1-B, and 1-C as soon as possible but no later than April 28, 2023 for this important program to continue for the Extension 2 period, and (2) provide funding under the prior Extension 1 budget from February 1, 2023, until the effective date of this advice letter once granted, to ensure continuous funding for the program for iFoster and the service provider.

Sincerely yours,

A handwritten signature in black ink that reads "Serita Cox".

Serita Cox
CEO, iFoster Inc.

Attachments: Attachment A (Additional Information) and Attachment B (Revised Budget)

cc: Service list for R.20-02-008
Chari Worster (via email chari.worster@cpuc.ca.gov)
Harjeet Kumar (via email harjeet.kumar@cpuc.ca.gov)
Maria Valadez (via email Maria.valadez@cpuc.ca.gov)
Nicholas Clark (via email Nicholas.clark@cpuc.ca.gov)



ATTACHMENT A

iFoster hereby amends its AL 1 to provide this supplemental information:

A. Updated Budget

iFoster hereby provides an updated budget (attached as Attachment B) to reflect changes reflected in AL 1-A, 1-B and this 1-C, reflecting agreements with CD staff upon review of the advice letter.

The changes made are as follows:

1. Reduced Marketing and Outreach section to \$6,000/month (See AL 1-B) and only in the areas of Marketing Manager, MM Benefits, Outreach Activities and Materials.
2. In Participant Phone Audit and Fiscal Control: Increased Controller to 0.25 FTE and Program Director to 0.35 FTE with the understanding that this activity may have different iFoster senior employees taking these roles.
3. Removed CFO and CEO time.
4. Removed Indirect Cost.
5. Because the Marketing Budget proposed in AL 1 was reduced from the proposed \$342,022.77 to \$85,200 for the Extension 2 period, iFoster has adjusted its new participant growth forecast, which originally was 11, 250. The new participant growth is now forecasted to be in the range of 3,750 to 5,250. iFoster will make every effort to achieve the high range of the 5,250 new participants. The forecast reduction results in an associated reduction in hardware and service plan budgets. The budget now reflects the high range of the participant forecast (5,250) as to hardware and service plan budgets.
6. The revised budget for the Extension 2 program has a start date of May 1, 2023. iFoster used the prior Extension 1 run rate from February 1, 2023 to April 30, 2023, as agreed to by Communications Division staff by email dated March 20, 2023 in order to keep the program running while approval of AL 1 was pending.

B. Administration

In AL 1-B, iFoster discussed an upgrade to the CRM system to take on additional reporting responsibilities. As to its reports and the data sent to the CPUC on the program, iFoster has agreed to change the iFoster nicknames from (for example) "iFoster123" to "Foster123"; however, iFoster is not required to change the iFoster nicknames in its iFoster CRM system because these nicknames are automatically generated and used for delivery of other iFoster services, government benefits and resources to the foster youth, caregivers and agencies across the country. Further, iFoster has agreed to provide the age and County information of a iFoster Program participant to the Commission in its reports, which are not Personal Health Information protected by HIPAA. iFoster shall also provide aggregate forecasts of participants turning 18, 26 and 27 by month on a quarterly basis.



C. Phone and Services

In AL 1-B, iFoster proposed to provide hard device cases to Participants in order to prevent breakage and reduce phone replacement costs. iFoster further agrees to provide a quarter's worth of data from the Extension 2 era to CD Staff to support iFoster's assertion that provision of the hard cases helps defray the need for new phones due to breakage. If the cost effectiveness of the provision of hard cases is shown to be less than 60%, then iFoster acknowledges that CD Staff may stop paying for the hard cases.



ATTACHMENT B

REVISED BUDGET

Table 1 Revised Budget for 18 Month Extension February 1, 2023 to July 31, 2024

Quarterly Summary	2023				2024		
Pilot Extension Expenditure Categories	Q1 (Feb/Mar)	Q2	Q3	Q4	Q1	Q2	Q3 (Jul)
Marketing and Outreach	\$ -	\$ 7,200.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 18,000.00	\$ 6,000.00
Administration	\$ 28,426.76	\$ 164,873.38	\$ 175,990.00	\$ 75,990.00	\$ 75,990.00	\$ 75,990.00	\$ 25,330.00
Participant Phone Audit and Fiscal Control	\$ 922.88	\$ 7,661.44	\$ 10,800.00	\$ 10,800.00	\$ 10,800.00	\$ 10,800.00	\$ 3,600.00
Hardware	\$ 51,000.00	\$ 79,500.00	\$ 81,000.00	\$ 81,000.00	\$ 81,000.00	\$ 81,000.00	\$ 27,000.00
Service Plan	\$ 497,408.00	\$ 783,087.00	\$ 826,587.00	\$ 865,737.00	\$ 904,887.00	\$ 944,037.00	\$ 323,379.00
TOTAL	\$ 577,757.64	\$1,042,321.82	\$1,112,377.00	\$1,051,527.00	\$1,090,677.00	\$1,129,827.00	\$ 385,309.00

NOTE1: Budget for February, March and April 2023 continues the monthly budget approved under AL28 for the first extension of the Program which lasted until January 31, 2023. This is by approval of CD staff as AL 1 is being considered.

NOTE2: The Marketing budget reduction from \$342,022.77 to \$85,200 results in a new participant growth forecast range with a low of 3,750 and a high of 5,250 new participants. (The prior forecast was 11,250 participants under the original budget submitted with AL 1.) iFoster will make every effort to achieve the high range of the forecast. Forecast reduction results in an associated reduction in forecasted hardware and service plan budgets. The budget reflects the high range of new participants in the budget for hardware and service plan.