



Appendix B

FILED
3-05-15
04:59 PM

Comparisons of Eligibility for Public Assistance Programs

The California Emerging Technology Fund (CETF) supports the Proposed Decision by the CPUC Administrative Law Judge Bemdesderfer to require an expansion in eligibility for the Comcast Internet Essentials (IE) program so that all low-income households will qualify for IE. CETF recommends that the Commission accept enrollment in the public assistance programs used as qualification for the Telephone Lifeline Program as low-income eligibility for IE. Thus, a household will qualify for IE if any member is enrolled in any one of these programs:

- Medicaid / Medi-Cal
- Low Income Home Energy Assistance Program (LIHEAP) Weatherization
- Supplemental Security Income (SSI)
- Federal Public Housing Assistance or Section 8
- CalFresh, Food Stamps or Supplemental Nutrition Assistance Program (SNAP)
- Women, Infants and Children Program (WIC)
- National School Lunch Program (NSLP)
- Temporary Assistance for Needy Families (TANF)
- California Work Opportunity and Responsibility to Kids (CalWORKs)
- Stanislaus County Work Opportunity and Responsibility to Kids (StanWORKs)
- Welfare-to-Work (WTW)
- Greater Avenues for Independence (GAIN)
- Tribal TANF
- Bureau of Indian Affairs General Assistance
- Head Start Income Eligible (Tribal Only)
- Food Distribution Program on Indian Reservations

Source: <http://www.cpuc.ca.gov/PUC/Telco/Public+Programs/ults.htm>

Using existing Telephone Lifeline eligibility criteria will avoid a costly and time-consuming separate eligibility process for the expanded IE program.

For low-income households not enrolled in one of the above programs, the most appropriate baseline for poverty in California is 200% of the federal poverty level (FPL), which is \$47,700 for a family of 4 in 2015 (see Chart A), not 150% of FPL as suggested in the Proposed Decision. This is critical because families with students who qualify for reduced-cost lunch and who currently qualify for Internet Essentials would be excluded by establishing eligibility at 150% of federal poverty level. The income eligibility for reduced-price lunch in the National School Lunch Program is set at 185% the FPL (see Chart B).

CETF research found that four California public assistance programs today are at 200% of FPL (or close to it): Low Income Home Energy Assistance Program (LIHEAP) Weatherization (193% of FPL); California Alternative Rates for Energy (CARE) (200% of FPL); CalFresh SNAP (200% of FPL); Family Electric Rate Assistance Program (FERA) (250% of FPL).



Chart A

Federal Poverty Levels (FPL) by Family Unit

Source: <http://www.liheapch.acf.hhs.gov/profiles/povertytables/FY2015/popstate.htm>

U.S. Dept of Health and Human Services--Office of Community Services, Administration of Children and Families

Persons in Household	100% FPL	110% FPL	125% FPL	150% FPL	175% FPL	185% FPL	200% FPL
1	\$11,670	\$12,837	\$14,588	\$17,505	\$20,423	\$21,590	\$23,340
2	\$15,730	\$17,303	\$19,663	\$23,595	\$27,528	\$29,101	\$31,460
3	\$19,790	\$21,769	\$24,738	\$29,685	\$34,633	\$36,612	\$39,580
4	\$23,850	\$26,235	\$29,813	\$35,775	\$41,738	\$44,123	\$47,700
5	\$27,910	\$30,701	\$34,888	\$41,865	\$48,843	\$51,634	\$55,820
6	\$31,970	\$35,167	\$39,963	\$47,955	\$55,948	\$59,145	\$63,940
7	\$36,030	\$39,633	\$45,038	\$54,045	\$63,053	\$66,656	\$72,060
8	\$40,090	\$44,099	\$50,113	\$60,135	\$70,158	\$74,167	\$80,180

[Highlighting Added]

Chart B

National School Lunch Program Annual Household Income Guidelines

Effective July 1, 2014 – June 30, 2015

Source: Federal Register /Vol. 79, No. 43 /Wednesday, March 5, 2014 /Notices 12467

<http://www.fns.usda.gov/school-meals/income-eligibility-guidelines>

Persons in Household	100% Federal Poverty Level = Free Lunch	185% Federal Poverty Level = Reduced Price Lunch
1	\$11,670	\$21,590
2	\$15,730	\$29,101
3	\$19,790	\$36,612
4	\$23,850	\$44,123
5	\$27,910	\$51,634
6	\$31,970	\$59,145
7	\$36,030	\$66,656
8	\$40,090	\$74,167
Each Additional Person	+ 4,060	+ 7,511

[Highlighting Added]



Chart C

CalFresh – SNAP Income Limits

200% 2014 Federal Poverty Limits

“Most CalFresh households are subject to a gross income determination test. Gross Income is all non-excludable income from any source including all earned income and all unearned income. The maximum gross allowed is 200% of the Federal poverty level (FPL). Below is a chart of gross monthly income for 200% of the Federal poverty level by household size.”

Gross Monthly Income Eligibility Standards for Modified Categorical Eligibility (MCE) / Broad-Based Categorical Eligibility (BBCE) (200% of Federal Poverty Level)

Household Size	Gross Income
1	\$1,946
2	\$2,622
3	\$3,300
4	\$3,976
5	\$4,652
6	\$5,330
7	\$6,006
8	\$6,682
Each Additional Member	+ \$678

<http://www.cdss.ca.gov/foodstamps/PG3628.htm> [highlighting added]

The following chart adds the Annual Gross Income to the above data in the right-hand column:

Persons in Household	Monthly Gross Income	Annual Gross Income
1	\$1,946	\$23,352
2	\$2,622	\$31,464
3	\$3,300	\$39,600
4	\$3,976	\$47,712
5	\$4,652	\$55,824
6	\$5,330	\$63,960
7	\$6,006	\$72,072
8	\$6,682	\$80,184
Each Additional Member	+ \$678	+\$8,136



Chart D

Federal Low Income Weatherization (LIHEAP) Energy Income Guidelines

For a family of four, the federal LIHEAP program puts the annual income for a family of four at \$46,082. This is 193% of the FPL level of \$23,850 for a family of four in Chart A.

2015 Income Guidelines		
Persons in Household	Monthly Income	Annual Income
1	\$1,996.89	\$23,963.00
2	\$2,611.31	\$31,336.00
3	\$3,225.74	\$38,709.00
4	\$3,840.17	\$46,082.00
5	\$4,454.59	\$53,455.00
6	\$5,069.02	\$60,828.00
7	\$5,184.23	\$62,211.00
8	\$5,299.43	\$63,593.00
9	\$5,414.64	\$64,976.00
10	\$5,529.84	\$66,358.00

Source: <http://www.csd.ca.gov/Services/HelpPayingUtilityBills/EnergyIncomeGuidelines.aspx>

Note: This link is the Income Guideline Chart linked from homepage

<http://www.csd.ca.gov/Services/HelpPayingUtilityBills.aspx>

The CPUC provides this link for consumers to go to the federal low income weatherization program (LIHEAP): <http://www.cpuc.ca.gov/PUC/energy/Low+Income/fedcsd.htm>

Chart E

Family Electric Rate Assistance Program (FERA) Guidelines

“Families whose household income slightly exceeds the low-income energy program allowances will qualify to receive FERA discounts, which bills some of their electricity usage at a lower rate. FERA is available for customers of Southern California Edison, San Diego Gas and Electric Company, and Pacific Gas and Electric Company. Call your electric utility if your family qualifies. Following are the income limits in effect from June 1, 2014 to May 31, 2015:”

Persons in Household	200% of FPL (CARE/ESAP) +\$1	250% of FPL (FERA)
3	\$39,581	\$49,475
4	\$47,701	\$59,625
5	\$55,821	\$69,775
6	\$63,941	\$79,925
7	\$72,061	\$90,075
8	\$80,181	\$100,225
Each Additional Person	\$8,120	\$10,150



Source: <http://www.cpuc.ca.gov/PUC/energy/Low+Income/fera.htm>

Chart F

California Alternative Rates for Energy (CARE)

The income limits listed below are 200% of FPL compared to Chart A.

“Low-income customers that are enrolled in the CARE program receive a 30-35 percent discount on their electric and natural gas bills. Eligible customers are those whose total household income is at or below the income limits indicated below.”

Note: Income limits are effective through May 31, 2015.

Persons in Household	CARE
1 - 2	\$31,460
3	\$39,580
4	\$47,700
5	\$55,820
6	\$63,940
7	\$72,060
8	\$80,180
Each Additional Person	\$8,120

Persons in Household	Energy Savings Assistance Programs
1	\$31,460
2	\$31,460
3	\$39,580
4	\$47,700
5	\$55,820
6	\$63,940
7	\$72,060
8	\$80,180
Each Additional Person	\$8,120

Customers also may be eligible for CARE if they are enrolled in public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Healthy Families A & B, National School Lunch’s Free Lunch Program (NSL), Food Stamps/SNAP, Low Income Home Energy Assistance Program (LIHEAP), Head Start Income Eligible (Tribal Only), Supplemental Security Income (SSI), Bureau of Indian Affairs General Assistance, and Temporary Assistance for Needy Families (TANF) or Tribal TANF.”

Source: <http://www.cpuc.ca.gov/PUC/energy/Low+Income/care.htm>