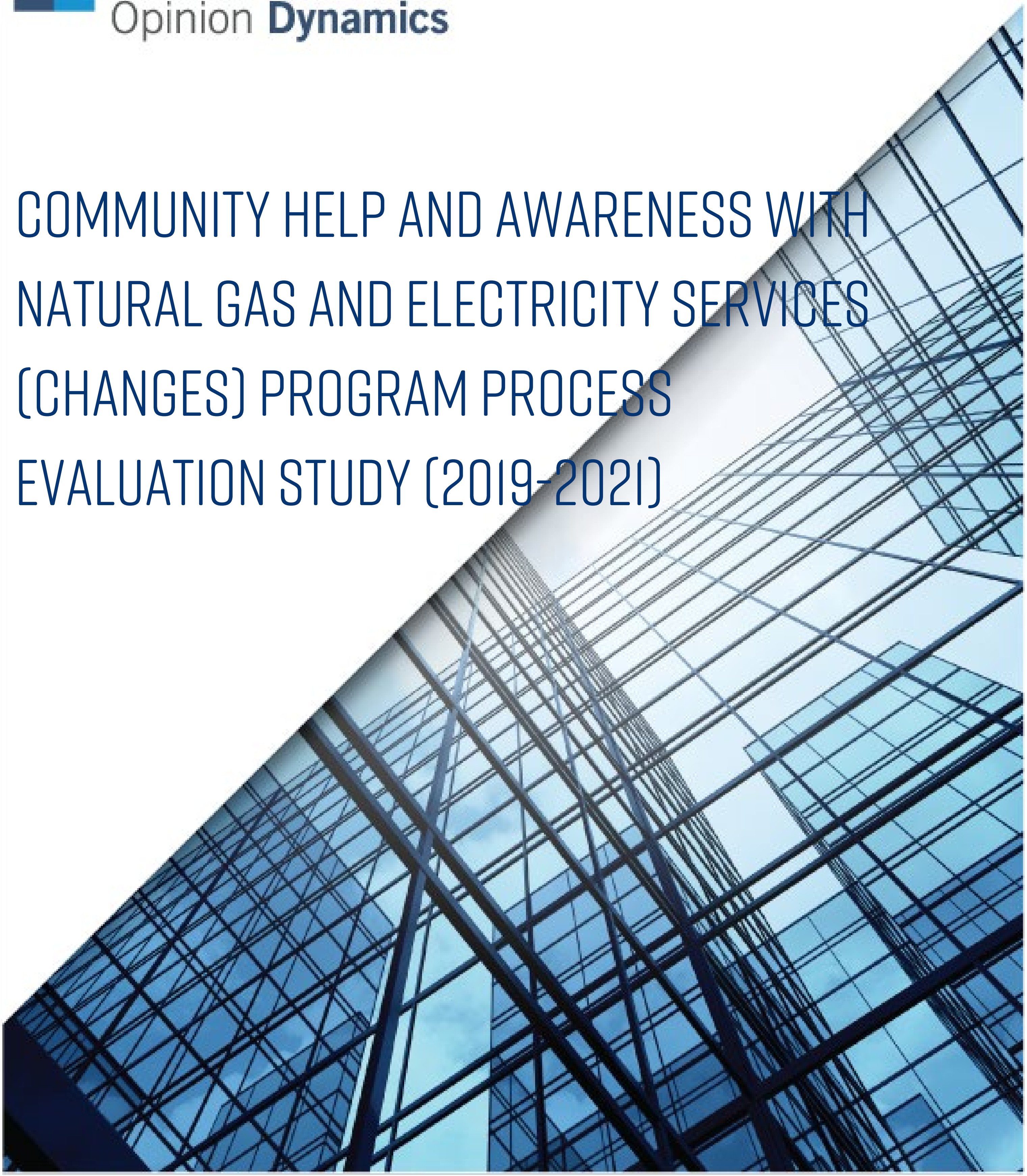
Opinion Dynamics

COMMUNITY HELP AND AWARENESS WITH NATURAL GAS AND ELECTRICITY SERVICES (CHANGES) PROGRAM PROCESS EVALUATION STUDY (2019-2021)



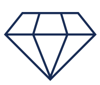
CONTENTS

I. EXECUTIVE SUMMARY

This report presents findings from Opinion Dynamics' process evaluation of the Community Help and Awareness of Natural Gas and Electricity Services Program ("CHANGES" or "Program") during the 2019 to 2021 calendar years. The CHANGES Program is implemented by Self-Help for the Elderly (SHE) through a network of 27 community-based organizations (CBOs). The California Public Utilities Commission (CPUC) oversees the Program, which is funded through a CARE (California Alternate Rates for Energy) charge to ratepayers collected by the four investor-owned utilities (IOUs). CHANGES aims to assist limited-English proficient (LEP) clients in managing their natural gas and electricity services through individualized case assistance (needs assistance and dispute resolution), education, and outreach in the client's native language.

The study objectives for the CHANGES' process evaluation included five key areas, each of which is outlined in Table 1.

Table 1. Research Objectives with Associated Description and Icon

Icon	Research Objective	Description
	Overall Performance	Assess overall program performance associated with anticipated needs of the target population. This includes an examination of who is served, how relevant/sensitive the Program is to their needs, and the relative benefits of each of the four functional areas: outreach activities, educational activities, needs assistance activities, and dispute resolution activities in serving the needs of the population.
	Data Collection	Identify the extent to which the current program data collection efforts support an understanding of the Program's effectiveness and ongoing reporting for success. If not, determine what data would be needed to do so.
	Program Value	Identify duplicative services, if any, within the IOUs. To the extent duplicative services do exist, determine what these services are and how they are being provided.
	Program Costs & Funding	Document how the budget and program costs are allocated across services or functional areas, the extent to which the budget is appropriate, and the appropriateness of the funding source in relation to addressing the primary customer needs supported by CHANGES.
	Program Operations & Structure	Examine the operational effectiveness of the administration of the Program. In particular, assess the effectiveness of the implementation contractor's role in, and management of, the Program, and identify potential ways to refine and improve the delivery and management structure of the services CHANGES seeks to provide.

To address the study objectives, Opinion Dynamics utilized the following research approach, which is summarized in Table 2:

Table 2. Research Approach

Task	Secondary Data Review	Program Stakeholder Interviews (n=17)	Participant Survey (n=221)
Task 1: Evaluability Assessment	✓	✓	
Task 2: Assessment of Program Costs and Benefits	✓	✓	✓
Task 3: Spatiotemporal Distribution Analysis	✓	✓	✓

- **Secondary Data Review:** We reviewed CPUC Decisions related to the CHANGES Program, CHANGES annual reports, CHANGES evaluation reports, CHANGES financial data including invoices, and program tracking data provided by SHE.
- **Program Stakeholder Interviews:** We conducted a total of 17 in-depth interviews across four program stakeholder groups: (1) CPUC staff overseeing CHANGES (n=1), (2) IOU administrators involved with CHANGES (n=4), (3) SHE and Milestone Consulting implementer staff who manage the network of CBOs (n=2), and (4) CBOs working directly with CHANGES participants (n=10). These interviews were conducted in August and September of 2022 and lasted 45 to 60 minutes each.
- **Participant Survey:** We conducted a mail survey with CHANGES participants who received individual case assistance in the calendar year 2021 (n=3,659). The survey was offered in the five most common CHANGES languages: Spanish, Cantonese, English, Korean, and Vietnamese. We offered a $25 gift card incentive to each respondent who completed the survey. We received 221 completed surveys,[1] for a response rate of 8.8%. Given the typical response rate for a mail survey (5%–10%) and the unique challenges of this survey (e.g., characteristics of the population, available data, etc.), an 8.8% response rate is considered high. As such, survey results allow for meaningful conclusions, representative of the CHANGES clients receiving case assistance in 2021.
- **Task 1 – Evaluability Assessment:** We developed a program theory logic model (PTLM) to codify the essential program activities intended to have direct or indirect effects on producing desired outcomes (see Appendix B). We then reviewed program data to see if program administrators had been tracking the data necessary to assess the linkages between program activities and program outcomes. We also investigated whether additional metrics would be valuable to demonstrate the Program's value. Altogether, the Program's theory of change, our review of data tracked, and the in-depth interviews informed our assessment on what metrics are most important to demonstrating the program's activities and outcomes, as well as significant gaps in data tracked.
- **Task 2 – Assessment of Program Costs and Benefits:** We assessed program costs and determined resultant benefits to ascertain how well the program is performing relative to its objectives. We leveraged secondary data along with primary data to gain a holistic view of the costs of implementing the program and the needs and benefits received by customers.
- **Task 3 - Spatiotemporal Distribution Analysis:** We conducted a spatiotemporal analysis to understand the distribution of CBOs and CHANGES services throughout the state by leveraging both GIS software and census data. Further, we compared the CBO coverage map we delivered to the presence of LEP households per county to identify any coverage gaps.

[1] In total, 303 surveys were returned but only 221 were considered "completed surveys." 82 of the survey respondents were screened out for not having received an energy-related service. See Appendix B for more information.

Overall, our assessment indicates that the CHANGES Program is adhering to its core principles and serving the energy-related needs of LEP customers within the IOU territories. We summarize the conclusions and recommendations from the evaluation below.

Research Objective: Overall Performance

- **Conclusion: The CHANGES Program is conducting activities aligned with its four stated objectives through program activities.** An analysis of program activity in three programmatic areas (case assistance, outreach, and education) indicates that the CHANGES Program is helping customers in the target population to: understand their energy bills; resolve bill disputes, service issues, and avoid disconnection; increase awareness of financial assistance and energy programs as well as support customer access to the programs; and learn about ways to save energy. Throughout the evaluation period, the CBOs in the CHANGES network reported providing services in 44 languages, served 10,831 unique clients through case assistance, held 5,431 educational events and 215 community outreach events, and conducted 113 media outreach placements.

Research Objectives: Data Collection and Overall Performance

- **Conclusion: Current data collection and tracking practices limit the ability of program implementers and stakeholders to understand the full impact of the program on LEP customers.** Additional variables are needed to understand how key program activities are affecting those receiving services. For example, program staff currently have no way of determining whether a given client received support multiple times or whether clients are being effectively channeled from one program activity to another. Further, the current data tracking structure does not allow SHE or participating CBOs to map an initial problem to a resolution, which is limiting the ability of the program implementation team to understand how effectively the program is serving clients.
  - **Recommendation**: The evaluation team recommends the CPUC work with SHE to improve the accessibility, completeness, and quality of program tracking data. While some components of this recommendation may require additional resources (e.g., budget, staff time, expertise) more and better data are needed to provide a robust assessment of program performance for both internal and external audiences. The evaluation team recommends investment in the following:
    - Establish unique client identifiers: Assign unique ID numbers to each CBO client so that service delivery is better understood and potential issues such as lack of issue resolution are more easily identified.
    - Add data fields critical to program delivery. Efforts should be made to collect and track the following data fields:
      - Specific referral source
      - Case resolution status
    - Review naming conventions and develop data dictionaries. Review current resolution naming conventions to ensure each resolution type is mutually exclusive and is aligned with the actual resolution and not the problem. Milestone Consulting and/or SHE should also create a data dictionary so that each and every resolution has a detailed description, thus making these data more easily understood across parties.
    - Improve tracking database configuration: Given that switching to a different data tracking software is unlikely, SHE should explore the feasibility of a few fixes within the current system. These include:
      - Allowing selection of only one customer problem at a time from the drop-down list and then allowing for the list of resolutions to include primary resolution and secondary resolutions. The CBO would then also be able to select a second and third customer problem, if needed.

        - Configuring the system to allow CBO staff to pull reports that can be exported into the monthly invoicing template.
        - Using field validation to reduce manual data entry errors.
    - Recommendation: As detailed within the report, the evaluation team recommends codifying metrics related to program activities, client characteristics, program referrals, and assistance outcomes among other areas (see Section 4.2.2).

Research Objective: Program Costs and Funding

- **Conclusion: While there is no definitive evidence within this evaluation period to suggest that expanding funding for the CHANGES Program is warranted, COVID-related budget impacts and demand fluctuations suggest that a longer time horizon is needed to comprehensively assess the basis for funding expansion.** The program budget was underspent each year of the evaluation period; however, current invoices indicate this will not be the case for 2023. Findings from interviewed CBO staff and surveyed CHANGES clients suggest that case assistance services are the most valuable and beneficial to the program, and program tracking data indicate case assistance is the largest share of annual program spending. Additionally, program data indicate that spending on case assistance has been increasing year over year. The moratoriums on disconnections during COVID have been lifted, and dispute resolution cases, which saw a decrease aligned with the moratoriums, are rebounding. At the same time, CBOs incur case assistance costs associated with handling time-intensive bill disputes, addressing multiple clients' needs under one service/resolution, and helping clients in small multi-jurisdictional utilities (SMJUs), which are not fully reimbursed through the program.
    - **Recommendation**: The next evaluation should assess whether an increase in funding is warranted, using data from 2022 and 2023 and pre-COVID data (which was outside the timeframe for this evaluation). This assessment should also account for any CBOs added or removed from the network (one CBO left in 2022) and budget estimates for expanding services into SMJUs and municipal utility territories.
    - **Recommendation**: The CPUC should revisit the basis for the per unit cost established for case assistance with SHE, examining how the current cost per unit was established and what updates should be made to key assumptions. There is currently a misalignment between the reimbursement per service type for case assistance and the manner in which the service is provided. For example, one case can result in multiple resolutions. However, payment is limited to one resolution per case. On average there are 1.24 resolutions completed per case. This means that when a CBO spends more time resolving multiple issues for a client, that is not reflected in the reimbursement amount.

Research Objective: Program Costs and Funding

- **Conclusion: Program costs may not be fairly distributed across the IOUs, as indicated by the services provided in their territories.** Each IOU provides a set proportion of funding for the CHANGES Program that does not change based on the number of services provided in its territory. However, based on available data from case assistance services and community outreach events, SDG&E, SCG, and SCE may have overpaid during the evaluation period based on program activity, while PG&E may have underpaid.
    - **Recommendation**: The CPUC should work with SHE and the IOUs to understand the misalignment in service provision in IOU territory and IOU funding. This may include:
        - Re-evaluating the traditional funding split of 30% PG&E, 30% SCE, 25% SCG, and 15% SDG&E

Research Objective: Program Operations and Structure

- **Conclusion: From a participating client and CBO staff perspective, the CHANGES Program is effective in meeting customer needs. However, data on the distribution of CBOs and program activity indicates the current model may have some weaknesses in ensuring adequate coverage in all areas of need.** CBO clients report high levels of satisfaction with the services provided through the program and participating CBOs report satisfaction with the implementation team (SHE and Milestone Consulting). While members of the implementation team are located in opposite parts of the state (i.e., SHE is located in the North and Milestone Consulting in the South), interview data suggest that they are working together to manage the CBO network and provide services throughout the state. Census data combined with CBO coverage data suggest that LA county may be underserved. Furthermore, the central valley is at risk of becoming underserved if it were to experience a loss of coverage from a CBO. Additionally, there are underserved areas located within and outside of IOU territories. In terms of the latter, CBOs report providing energy-related assistance to clients in SMJUs and other municipal utilities, but are unable to seek reimbursement for these services, given the current program structure.

- **Recommendation**: The CPUC should consider the benefits, drawbacks, and budget implications of expanding CHANGES service delivery to areas served by SMJUs and other municipal utilities to meet the needs of all LEP customers in California. While there are not currently data available from the CBOs to help assess how large the need outside of IOU territories might be, looking at the percentage of LEP households in those areas could help inform this estimation as could outreach directly to those other utilities.
- **Recommendation**: SHE should re-evaluate CBO coverage and potentially consider adding a few more CBOs in unserved/underserved areas.

Research Objective: Program Costs and Funding

- **Conclusion: Based on the services provided and the customers who benefit, funding the CHANGES Program through the CARE budget is appropriate as compared to the general rate case (GRC).** Almost all CHANGES participants are eligible for CARE (96%) and over three-quarters of eligible CARE participants are enrolled in that program (88%). Furthermore, CARE is currently funded via a rate surcharge paid by all other utility customers, excluding CARE customers.[2] If the CHANGES program were to be funded through the GRC instead of CARE, CHANGES clients would pay for the program via their rates. The current funding set up ensures that the costs are recovered in rates to other non-low income customers, which is aligned with best practices.

[2] https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/care-fera-program

2. INTRODUCTION

2.1 BACKGROUND

The CHANGES Program delivers in-language services to LEP customers of the four main IOUs in California. Started as a pilot in 2011, CHANGES is now in its eleventh year, offering individualized case assistance (e.g., needs assistance and dispute resolution), education, and outreach to help LEP customers manage their natural gas and electricity services. The CHANGES program is implemented by SHE through a network of 27 participating CBOs. The objective of the program is to improve client resolution efforts through the network of CBOs that are expected to be able to bridge barriers and effectively communicate between the IOUs and the LEP clients.

The CPUC oversees the CHANGES Program. The Program is funded by a CARE charge to ratepayers that is collected by the IOUs. CHANGES operated as a pilot program beginning in February 2011 with a budget of $500,000 in the first year and was authorized as an ongoing program in December 2015 per D.15-12-047,[3] with funding from the California Alternate Rates for Energy (CARE) budget at a level not to exceed $1,750,000. The budget has since been increased to $1,752,502 annually for program years 2021 - 2026 via D.21-06-015.[4] There are no formally established success metrics tied to this budget and/or program as a whole.[5]

2.2 OVERVIEW OF STUDY

A statewide study team[6] selected Opinion Dynamics to conduct a process evaluation of the CHANGES Program for the three-year period from 2019–2021. The purpose of the evaluation was to assess program delivery and effectiveness across five key areas: Overall Performance, Data Collection, Program Value, Program Costs and Funding, and Program Operations and Structure. This report is structured to show the evaluation approach Opinion Dynamics used assessing these five key areas, as well as the respective findings and recommendations.[7] The evaluation objectives related to each area are outlined below:

- **Overall Performance:** Assess overall program performance associated with anticipated needs of the target population. This includes an examination of who is served, how relevant/sensitive the program is to their needs, and the relative benefits of each of the functional areas: outreach activities, educational activities, and 1:1 case assistance activities in serving the needs of the population.
- **Data Collection:** Identify the extent to which current program data collection supports an understanding of the program's effectiveness and ongoing reporting for success. If not, what data will be needed to do so?

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[3] All CPUC Decisions related to this program can be found at https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs

[4] Ibid.

[5] Per the 2018 CHANGES Evaluation Report written by Level 4 Ventures, Inc., page eight states that "…no formal critical success factors are identified and used to measure program success." The author of this report suggested that CHANGES stakeholders establish three to seven success factors and measure the program against them.

[6] The statewide study team included members from the CPUC, PG&E, SCE, SCG, and SDG&E. The core members were: CPUC – Ravinder Mangat and Mia Hart; PG&E – Iris Cheung; SCE – Carol Edwards; SDG&E – Brenda Gettig; and SCG – Kevin Ehsani.

[7] Public comments about the evaluation process were submitted by some CBOs in the CHANGES network for both the first and second public comment periods. Some CBOs expressed concerns with a conflict of interest with IOU involvement, lack of transparency regarding vendor selection, and findings being independent and valid. These comments and responses can be found at https://pda.energydataweb.com/#!/ . Use the search bar to find "CHANGES."

- **Program Value:** Identify duplicative services, if any. To the extent they exist, what are these services and how are they being provided?[8]
- **Program Costs & Funding:** Document how the budget and program costs are allocated across services or functional areas, the extent to which the budget is appropriate, and the appropriateness of the funding source in relation to addressing the primary customer needs supported by CHANGES.
- **Program Operations and Structure:** Examine the operational effectiveness of the administration of the program. In particular, assess the effectiveness of the implementation contractor's role and management of the program, and identify potential ways to refine and improve the delivery and management structure of the services CHANGES seeks to provide.

To address the study's objectives, the Opinion Dynamics' evaluation team employed a mixed-methods research approach that leveraged existing data sources and collected new primary data, detailed in the next section.

[8] Note that the objectives related to this area of inquiry ("Program Value") have been updated in coordination with the study team. Originally, the objective here was to, "Examine net benefits of program in comparison to similar programs/services operated by IOUs or other entities across the US."

3. METHODS

The evaluation team collected and analyzed both primary and secondary data to achieve the research objectives. Our primary data collection activities comprised in-depth interviews with CPUC, CBOs, SHE, Milestone Consulting,[9] and IOU program staff, as well as a mail survey of 2021 program participants. We also conducted a secondary data review to inform the majority of our evaluation activities. Table 3 gives a brief overview of our research approach and we describe these data collection activities and associated methods in the following sections. For specific research questions related to the evaluation tasks, please see Appendix A.

Table 3. Research Approach

Task	Secondary Data Review	Program Stakeholder Interviews (CPUC, CBOs, SHE, IOUs)	Participant Survey
Task 1: Evaluability Assessment	✓	✓	
Task 2: Assessment of Program Costs and Benefits	✓	✓	✓
Task 3: Spatiotemporal Distribution Analysis	✓	✓	✓

3.1 SECONDARY DATA REVIEW

The evaluation team collaborated with SHE and the CPUC to obtain a variety of program-related materials from which to extract data. A review of these documents and data sources supported the development of the PTLM in our evaluability assessment, the assessment of program costs and benefits, as well as the spatiotemporal distribution analysis.

Reviewed materials included:

- **CPUC Decisions Related to the CHANGES Program**: We reviewed pertinent Decisions to inform our understanding of the evolution of the program, its purposes, and funding mechanisms. These included Decision 15-12-047, adopted in December of 2015; Decision 14-08-030, adopted in December 2014; and Decision 12-12-011, adopted in December of 2012.
- **Past CHANGES Evaluation Reports**: We reviewed the CHANGES Evaluation Reports from 2012, 2014, and 2018.
- **CHANGES Annual Reports**: We reviewed CHANGES annual reports prepared by the CPUC for program years 2017-2018, 2018-2019, 2019-2020, and 2020-2021.
- **Financial Data**: We reviewed and analyzed invoices from SHE to the CPUC, and from the CPUC to the IOUs for the years under study (2019-2021).
- **CHANGES Program Tracking Data**: We reviewed and analyzed program tracking data compiled by SHE, which included details of various CBOs' outreach activities, education workshops, and case assistance activities. Case assistance includes the one-on-one activities of dispute resolution and needs assistance.

3.2 PROGRAM STAKEHOLDER INTERVIEWS

The evaluation team conducted in-depth program stakeholder interviews in August and September of 2022. These interviews spanned four program stakeholder types: (1) CPUC staff overseeing CHANGES; (2) IOU administrators involved with CHANGES; (3) the SHE implementation team including their sub-contractor Milestone Consulting, who

[9] Milestone Consulting is a subcontractor to SHE who helps manage the CBO network and program related activities.

manage the network of CBOs; and, (4) select CBOs working directly with CHANGES participants. We created an interview guide for each program actor type based on the research questions for this study (refer to Appendix A for details). Table 4 presents an overview of the stakeholder groups we completed in-depth interviews with and their role in the program.

Table 4. Program Stakeholder Interview Details

Program Stakeholder	Program Role	Completed Interviews
CBO Staff	Deliver services to LEP clients	10
IOU Staff	Provide funding for the program through a CARE charge collected from ratepayers, administer CHANGES help line for CBOs to call when assisting CHANGES clients	4
CPUC Staff	Provide program oversight	1
SHE Staff	Administer the program and oversee CBOs; deliver services to clients as a participating CBO	1
Milestone Consulting Staff	Train and support participating CBOs	1
Total		**17**

The evaluation team used a census approach for interviewing the IOU, CPUC, SHE, and Milestone Consulting staff. We were successful in this approach and conducted interviews with all those organizations.

We used purposive sampling to select CBOs for the interviews. From 2019-2021, there were 27 CBOs providing energy-related services through the CHANGES Program, including SHE who serves a dual role as both a CBO and the program implementor. To create the purposive sample, we first categorized all 27 CBOs into Priority Groups.

We used several factors to rank and prioritize the CBOs into three Priority Groups. These factors included language(s) the CBO offered services in, the number of languages the CBO offered services in, the number of customers served in the program years under study, and the distribution of these customers across different utility territories. This approach resulted in 10 CBOs included in Priority Group 1, 10 CBOs in Priority Group 2, and 7 in Priority Group 3.

More specifically, we first ranked the CBOs in order of the number of customers served, putting those with the fewest customers at the bottom. We made sure our Priority Group 1 contained at least two CBOs that supported each of the five key languages (Cantonese, English, Spanish, Vietnamese and Korean). We also included some CBOs in Priority Group 1 that provided services in other languages. Then, we adjusted our ranking to ensure that the Priority Group 1 included at least two CBOs that conducted a majority of their services in each utility territory. Finally, we incorporated an even mix of CBOs that attended this evaluation study's first public workshop in June of 2022 and those that did not for Priority Groups 1 and 2.

We then invited all the CBOs in Priority Group 1 to participate in an interview. In cases where a prioritized CBO was unresponsive or declined an interview, we sought to replace it with a similar CBO from the next priority group to keep the distribution outlined above, working to maintain a balance in languages and locations. We continued this approach until we reached our target of 10 completed CBO interviews.

The 10 interviewed CBOs offered services in the five most common program languages and served all four IOU territories (Table 5). San Diego Gas and Electric (SDG&E) was underrepresented and none of the interviewed CBOs served more than 10% of their clients in SDG&E territory. This was not necessarily surprising, however, as this reflects the number of CHANGES CBOs conducting work in SDG&E territory. Of the three CBOs who conduct the majority of their work in SDG&E territory, one had only assisted 11 clients in the three program years under study and was in Priority Group 3. The other two CBOs we invited for an interview but did not respond.

Table 5. Interviewed CBO Characteristics

Services Offered by…	Number of Interviewed CBOs (n=10)
Language	
English	10
Spanish	7
Vietnamese	4
Cantonese	4
Korean	3
Location (>10% of clients served)	
PG&E	5
SCE	6
SCG	5
SDG&E	0

There are some limitations to this study from our use of interview data. First, interview data are self-report, which means the evaluator cannot independently verify all information provided in the interviews. To minimize this limitation, the evaluation team assured the respondent of their data's confidentiality, which can put them at ease and improve the likelihood they will provide honest and candid responses. A second limitation of this study stemming from the interviews is that we were unable to survey a census of CBOs. Therefore, we cannot know how well our CBO interview sample represents the CHANGES CBO population. As such, there may be experiences and opinions among the CHANGES CBOs that are not captured in our interview data.

3.3 PARTICIPANT SURVEY

The evaluation team conducted a printed mail survey of CHANGES participants who received individual case assistance in the calendar year 2021. The purpose of the survey was to explore: to what extent the program meets its stated objectives in helping customers in the target population; the key benefits, limitations, and potential improvements of the four primary program activities; and, the main participation barriers customers face. Given that the implementor, SHE, was only able to provide customer mailing address and a manually created unique identifier to protect customer privacy, we crafted a survey approach to maximize participation.

Participants were sent a paper survey instrument printed in one of the five most common languages for service delivery: Spanish, Cantonese, English, Korean, and Vietnamese[10,11] (see Appendix F). We matched the specific language of the survey instrument with the language in which the participant received services, as indicated in the program tracking data. We also printed the survey invitation on letterhead provided by SHE, which was CHANGES-specific and included a list of all the CBOs in the network to help build trust and legitimacy with the survey.

We provided participants with a pre-paid return envelope for mailing back the completed survey. We offered a $25 gift card incentive to each participant who completed the survey. The evaluation team also included a toll-free number in the survey invitation in case participants had questions. The toll-free line had a pre-recorded survey message in all five languages asking participants to leave a message. The evaluation team called participants back in their preferred

[10] These five groups comprised 89% of the total services provided and of the total number of unique participants in the calendar year of 2021. One participant can receive multiple services or open multiple cases.

[11] The evaluation team conducted a round of revisions to the survey translations to ensure that they used culturally relevant language. The evaluation team received support from select CBOs and the study team to complete this step.

language to answer any questions. Table 6 below describes our sample frame, sampling approach and the response rate we obtained from the survey.

Table 6. Sample Frame Description

	Details
Population Description	All customers who received case assistance services in Spanish, Cantonese, English, Vietnamese or Korean in 2021
Population Size	3,659
Sample Size	3,659
Target of Completes	70
Sampling Method	Census
Valid Completed Surveys	221

Table 7 shows the number of completed surveys across IOUs and the corresponding response rates.

Table 7. Survey Completes and Response Rates by IOU

IOU	Completed Surveys	Response Rate[12]
PG&E	143	7.9%
SCG	17	11.1%
SCE	39	11.0%
SDG&E	37	11.6%
Overall*	**221**	**8.8%**

*This represents the total number of participants as opposed to the sum across this column, because one participant can have more than one IOU associated to them in program records.

CHANGES participants who received services in Cantonese yielded the highest response rate at 17%, followed by English, Korean and Vietnamese, all at 11% (Table 8). The evaluation team believes that the reason for such high response rate among the four languages is a combination of the attractiveness of the incentive, and for Cantonese, Korean, and Vietnamese speakers, the novelty of getting a survey in their own language. Spanish-speakers had the lowest response rate at 4%, however, that response rate is aligned with what the evaluation team expected given industry trends.

Table 8. Survey Completes and Response Rates by Language

Participant Language	Completed Surveys	Response Rate
Cantonese	117	17.0%
English	33	11.4%
Korean	12	11.4%
Vietnamese	14	11.3%
Spanish	45	4.1%
Total	**221**	**8.8%**

[12] The calculation of the response rate excludes any undelivered mail as well as participants who were ineligible for the survey.

As the evaluation team did not have complete data on participants, limitations exist for the survey. First, without having access to participant first and last name, surveys were addressed to "Current Resident." If the CHANGES participant on file no longer resided at the address in the program tracking data, then the new resident would have received the survey. This is because United States Postal Service is unable to forward mail when it is only addressed to current resident as they need a full name to link the old and new address. A portion of returned surveys indicated that no energy-related services were received (82 of 303 returned surveys) and thus they were screened-out. As such, there is the potential that non-CHANGES residents returned the survey, but we are unable to verify or quantify the extent to which this may be the case. Additional information on participants who screened out is available in Appendix B.

3.4 TASK 1: EVALUABILITY ASSESSMENT

The first step of the evaluability assessment was developing a program theory logic model (PTLM) and metrics. The PTLM codifies the essential program activities that program implementers think will have direct or indirect effects on producing the desired outcomes (i.e., the theory of change). It includes: inputs, activities, and outputs; the sequence of outcomes that follow; and, the linkages among these elements.

The evaluation team drafted a PTLM and shared it with the statewide study team to solicit feedback. We conducted a facilitated discussion with the study team where we walked through the activities and causal linkages that lead to the program outcomes. We took the feedback from this discussion and produced a revised logic model and distributed it for a second round of feedback. This iterative feedback ensured that the final logic model accurately captured the design and theory of change needed for a meaningful assessment of the CHANGES Program. Please see Appendix B for the PTLM.

The second step of the evaluability assessment was to review program data sources to see if program administrators had been tracking the data necessary to assess the linkages between program activities and program outcomes. Lastly, we investigated whether metrics could be developed to better demonstrate the program's value. Altogether, the program's theory of change, our review of tracked data, and information gained through in-depth interviews informed our assessment of the most program-critical metrics for activities and outcomes, and gaps in data tracked.

3.5 TASK 2: ASSESSMENT OF COSTS AND BENEFITS

The evaluation team assessed program costs and benefits to further inform a determination of how well the program is performing relative to its objectives. We leveraged secondary data, along with primary data gathered through in-depth interviews and participant surveys, to gain a holistic view of the costs associated with implementing the program and the needs of and benefits received by customers. Secondary data reviewed for the assessment included program tracking data, key CPUC Decisions, and financial data from SHE and the CPUC.

Table 9 outlines the specific criteria that the evaluation team assessed, along with the associated data source.

Table 9. Data Source of Benefits and Costs Criteria Assessed

Criteria	Data Source
Benefits	
Number of customers served (total and by IOU, CBO, and language)	Secondary data – Program Tracking Data
Number of services provided (by service type, IOU, CBO, language etc.)	Secondary data – Program Tracking Data
Percent of total services provided (by service type, IOU, CBO, language etc.)	Secondary data – Program Tracking Data
Perceived customer benefits	Participant survey

Criteria	Data Source
Ability to meet customer needs	Participant survey
Quality of service provided/customer satisfaction	Participant survey
Costs	
Total program budget	Secondary data – CPUC Decisions/Invoices
Budget by IOU	Secondary data - CPUC Decisions/Invoices
Cost per service provided (by service type, IOU, CBO, etc.)	Secondary data - Invoices
Cost per unique case assistance client, case event, and resolution	Secondary data – Program tracking data, Invoices, CPUC Decisions

3.6 TASK 3: SPATIOTEMPORAL DISTRIBUTION ANALYSIS

We conducted a spatiotemporal distribution analysis to understand the service coverage of CBOs and CHANGES service provision throughout the state. In conducting this analysis, the evaluation team leveraged GIS software and updated census data estimates from the American Community Survey (ACS) 5-Year Data that was released in mid-March 2022.[13] Table 10 outlines the census data tables used to inform our analysis.

Table 10.Census Data Tables Used in Spatiotemporal Distribution Analysis

Census Data Table	Table Notes
S1602 Limited English-Speaking Households	# of limited English-speaking households. The table defines a "limited English-speaking household" as one in which no member 14 years old and over (1) speaks only English or (2) speaks a non-English language and speaks English "very well." By definition, English-only households cannot belong to this group.
S1601 Language Spoken at Home	# of households that speak a given language (roughly 38 different languages included in this data table) for all households, regardless of English proficiency
C17002 Ratio of Income to Poverty in the past 12 months	People and families are classified as being in poverty if their income is less than their poverty threshold. If their income is less than half their poverty threshold, they are below 50% of poverty; less than the threshold itself, they are in poverty (below 100% of poverty); less than 1.25 times the threshold, below 125% of poverty, and so on.
C16002 Household Language by Household Limited English-Speaking Status	This table groups languages into four categories: Spanish, Other Indo-European, Asia and Pacific Island, and Other for households that are limited English-speaking.

We used GIS to map the distribution of customers receiving case assistance through the CHANGES Program. First, we took the physical address of program participants from 2019-2021 provided by SHE and geocoded to a census block. We then overlayed this with additional census data on language, income, and other relevant demographics.

Additionally, we used GIS to map CHANGES affiliated CBO coverage across counties in California. To assess the optimal distribution of CBOs, the CBO coverage map was compared to the percent of LEP households per county. The evaluation team then estimated the number of LEP households in each county, by multiplying the total number of households by the percent LEP and compared the estimated number of households to the number of CBOs covering the area to identify relatively low and high coverage areas.

It should be noted that there are limitations to this approach. Although we are using CBO coverage as a proxy for support, there are additional nuances to CBOs that may impact the available support. CBOs can have different levels of capacity which can result in a different levels of support available. CBOs may also support multiple counties, diluting the capacity between multiple regions, which results in an overestimation of available support. Additionally, there are

13 https://www.census.gov/programs-surveys/acs/news/data-releases/2020/release.html#ABC

limitations to using LEP as a proxy for demand. Not every LEP household will require utility assistance, which may lead to an overestimation of demand. Lastly, even though the CBO are able to provide service in-language, services may still be provided in English (including Native American English and Sign Language). These households may not be included in the percent LEP but do require CHANGES assistance which would lead to an underestimation of demand.

The resultant series of maps were delivered to the study team and are presented throughout the remainder of the report.

4. RESULTS

We have structured this section to align with the five key evaluation objectives outlined in the Introduction, but we begin with a high-level participation summary to orient the reader. We then describe the program tracking data collected before discussing overall performance and other evaluation objectives.

4.1 PARTICIPATION SUMMARY

The CHANGES Program offers individualized case assistance, education, and outreach to help LEP customers manage their natural gas and electricity services. These three core functional areas and associated programmatic activities are described in Table 11.

Table 11. CHANGES Program Functional Areas and Associated Programmatic Activities

Functional Areas	Program Activity	Share of Program Activity*
Case Assistance	Needs Assistance, Dispute Resolution (also called Complaint Resolution)	72%
Education	Educational Workshops	27%
Outreach	Community Outreach, Media Outreach	2%

*Does not equal 100% due to rounding. Share of Program Activity is calculated from the total number of events throughout the evaluation period, detailed in Table 18.

Throughout the evaluation period, the CHANGES Program reached many LEP clients through its program activities. Table 12 provides a high-level snapshot of this success.

Table 12. CHANGES Program Snapshot

Provided services in 44 languages across a network of 27 CBOs
Served 10,831 unique clients via case assistance[14] ▪ 14,558 assistance cases ▪ 18,033 disputes/complaints resolutions
Held 5,431 educational events reaching more than 80,000 clients
Held 215 community outreach events
Conducted 113 media outreach placements

[14] If counting unique customers by year, this number is 12,613. However, when looking at the three evaluation years together, the number is 10,831, as 1,782 clients received services in multiple years, but no more than once per calendar year. For example, if a client received services once in 2019 and once in 2021, they would be counted as a unique client per each calendar year. When summed across the years in a table, for example, the sum would be 2, whereas counts looking for unique clients from 2019-2021 would equal 1.

4.2 DATA COLLECTION AND TRACKING

We assessed the extent to which current program data collection supports an understanding of the program's effectiveness and ongoing reporting for success. In doing so, we identified data gaps and offer suggestions for additional metrics to be tracked in the future.

4.2.1 CBO-LEVEL DATA COLLECTION, TRACKING, AND REPORTING

Participating CBOs collect and track a range of variables related to the services they provide through the CHANGES Program. Broadly, the data tracked supports SHE's understanding of the activities being conducted (e.g., type and content shared), their location, target population, and the number of clients reached or engaged.

Given the nature of case assistance activities, CBOs track a wider range of data related to case assistance to inform the assessment of program performance than they track with education and outreach activities. The data the CBO staff collect and report for CHANGES allow them to track how many clients they served, what their issues were, and the resolutions. Most CBO representatives did not have any misgivings with the required data elements for CHANGES. Often, these data elements were pieces of information that CBOs normally collect from all their clients.

> ***"Most of the data we have to enter is the information we need to get for the assistance we help with. So we get [that] information anyway [and], without knowing [that] information, we cannot really help them." – CBO Interviewee***

Due to this, attempting to allocate a portion of costs to CBO staff time recording data would be challenging and potentially inaccurate. **Data currently collected by CBO staff is an inherent part of delivering services and it is not possible to break out data management costs, or more simply the cost to collect data.** The exact data collected and recorded differs by program activity. Yet, for each program activity, the data that is collected is intrinsic to rendering that service. For example, counting the number of attendees at an education workshop or recording how many media placements they have issued is not a separate activity to the extent that they can identify the time and costs allocated to it. For one-on-one case assistance services, CBO staff must capture key datapoints to effectively assist the client or resolve the issue including the customer's demographic information, utility, and the nature of the issue. Therefore, the data entry related to helping clients is part and parcel of rendering CHANGES services and would be collected no matter what issue the customer arrived with at the CBO. However, adding data elements to collect, like customer contact information for outreach, would present an additional cost in terms of staff time and database set up.

CASE ASSISTANCE

Despite CBO comfort with program data requirements, the data currently collected and reported for case assistance are not sufficient to fully assess performance. Table 13 summarizes the key data items that CBOs collected, tracked, and reported for case assistance.

Table 13. Data Tracked by CBOs for Case Assistance

Key Data Items	Description
Unique ID	ID number unique to a client
Cases ID	ID number unique to a case
Address	Client street address

Key Data Items	Description
City	Client city
State	Client state
Zip code	Client zip code
Household	Household size (i.e., 1, 2, 3, ..., 15)
Age Group	Flag for age over 65 (i.e., 65 and above, under 65)
CARE Household Qualify	Flag if household qualifies for CARE
CARE Household Enrolled	Flag if household is enrolled in CARE
Income Level	Income level of household ranging from $0 to $340,000
Name (Language)	Language of assistance
CBO	CBO conducting education activity
Referral Source	How the client learned of the CBO and offered services (e.g., referring program, friend or family, mass media, CHANGES workshop)
Name (IOU)	IOU territory
Case Type	Fuel type relevant to assistance (i.e., gas, electricity, both)
Request Type	Need or dispute flag
Closed Date	Date dispute/need was resolved
Resolution	Solution to the case (e.g., CARE/FERA, Payment Extension, Level Pay Plan)
Customer Problem	Issue/difficulty client experienced

The effectiveness of case assistance should be measured by the ability of that assistance to provide services that resolve customer problems and meet customer needs. Current data includes which assistance services were provided and who received the assistance, however, no unique IDs are created to identify the client. By tracking participation at the unique customer level, program staff can identify repeat customers. Repeat customers could indicate that the resolution service may need improvement to increase participant independence in the future. On the other hand, clients who approach the CBO multiple times but receive different services may indicate successful channeling and establishing a trusted relationship.

One limitation of the current data reported is that it does not contain any information on cases that were not resolved. Understanding if customers sought case assistance and had problems that were not resolvable could help identify expansion opportunities of the program. Furthermore, no data is available regarding time spent by the CBO resolving the case. Some cases may be resolved fairly quickly while other may involve in-depth time consuming services.

Additionally, collecting satisfaction metrics from customers on the success of the assistance at meeting their needs would also speak to the performance of the case assistance. If certain CBOs continually receive low satisfaction scores, it may indicate the need for targeted training or resources.

Based on these issues, we recommend that SHE require tracking of the following additional datapoints for one-on-one case assistance:

- Whether a client receives a single service/resolution multiple times or a different service each time
- Status of case resolution (e.g. “resolved,” “ongoing,” or “unresolvable”)
- Customer satisfaction with services received
- How many hours the CBO staff person dedicated to resolving the case

OUTREACH AND EDUCATIONAL ACTIVITIES

Overall, the data collected and reported for outreach and educational activities are not sufficient to fully assess performance. CBOs are not currently required to collect participant information for outreach and educational events, which limits the ability to assess performance. Despite this, we found some core data to be useful for tracking program activity. Table 14 summarizes the data tracked across outreach and educational activities. We discuss key data gaps in Section 4.2.4

Table 14 Summary of Data Points Tracked for Outreach and Education Activities

Key Data Points	Description	Community Outreach	Media Outreach	Educational Activities
Community Name	CBO conducting the activity	✓	✓	✓
Date Held	Date of activity	✓	✓	✓
Language	Language(s) in which activities are conducted	✓	✓	✓
Total No. of Participants	Number of clients attending, participating or reached	✓	✓	✓
IOU Name	IOU territory	✓		
Location	Address of event	✓		
Sponsor	Organizations sponsoring the event	✓		
Materials Distributed	Type of materials (e.g., flyers, brochures etc.)	✓		
Materials Distributed Detail	Description of materials classified as “other”	✓		
Media Outlet	Publication or broadcast medium		✓	
Placement Type	Newspaper, radio, etc.		✓	
Topics	Focus of the event - understanding your bill, safety, and high energy usage etc.			✓

OUTREACH ACTIVITIES

The performance of CHANGES outreach activities should be measured based on the success that those activities have in channeling customers into educational and needs/disputes activities. It is important to be able to track the impact of outreach on attendance and participation. This information would reveal which events are most effective, how the impact differs across client groups, and, potentially, if there are certain times of year where engagement is higher (such as in peak summer when energy bills are generally highest).

It would be ideal to have the ability to link CHANGES clients who saw or heard CBO outreach messages directly to the customer and education data. However, media outreach makes tracking specific customers challenging. The only way to capture whether media outreach made a potential client aware of a CBO is if the CBO could report more specific referral details in the customer data set. Currently, the customer data contain general information on referrals (ex. “community-outreach”, “mass-media”, etc.), which allows for general tracking and performance across the two major strategies but does not differentiate the individual events or channels. Collecting more specific information on the referral source could help identify which materials, placements, etc. are most effective, which could differ by client group and thus be optimized for each CBO and across different languages.

Additionally, reporting on the content of the media outreach and on the targeted community locations would add to the understanding of effectiveness and coverage of the outreach. Currently collected data include an estimate for the number of people that were reached but not where those people are located or what content they are receiving. As the data are currently reported, there is no way to know where a newspaper is distributed or where the radio channel is broadcast. It could be possible that the outreach is reaching the same people every time and providing the exact same information which would impact effectiveness.

Based on these issues, we recommend that SHE require tracking of the following additional datapoints for outreach activities:

- The name of the media placement or community outreach event that was the referral source for the one-on-one case assistance.
- Content of the media placement or community outreach event (is it about understanding energy bills, energy safety, payment assistance, rate plans, etc.)

EDUCATIONAL ACTIVITIES

Currently, CBOs do not report individual customers, their demographics, nor their referral source for educational events. Attempting to track more specific information on the customers that attend educational events could help to identify how effective different outreach channels are at directing customers to attend education events.

The performance of CHANGES educational activities should be measured based on the success that those activities have on educating customers on various CHANGES topics. Customer contact information for those who participate in educational events is missing from the program tracking data. Tracking specific customers who are attending educational events will help to understand if customers are attending multiple events that cover the same topic. Additionally, tracking specific customers would provide insight into how different educational workshops channel clients into assistance services. Alternatively, this could be tracked on the case assistance side when reporting referral source. Currently, collected customer data contain general information on referrals but it does not differentiate among the topics of the referring educational workshops. Collecting more specific information could help identify workshops that are most effective at channeling. Some CBOs already collect this customer contact information at educational events and some outreach events, however, it is not always feasible for them to enter these data into an existing database because of staff constraints and legibility of the information collected.

We understand why a CBO may be reluctant to ask for an individual's identifying information. In these cases, the CBOs might implement a post-workshop survey to measure knowledge gained, the effectiveness of the educational activity, and additional resource or informational needs. Review of CHANGES invoices along with the existence of pre-test/post-tests on various educational topics suggests that educational activities are being monitored, however, it is unclear where this information is reported and what is done with it. Reporting and analyzing the evaluation results could help inform future educational activities. This information can then be used to identify the topics that are getting repeat customers or where the content could be improved. It would also allow for identifying the optimal number of participants, i.e., if smaller or larger educational groups are more effective.

Based on these issues, we recommend that SHE require tracking of the following additional datapoints for educational workshops:

- A referral source (e.g., media outreach, community outreach, case assistance)
- Measures of knowledge learned from workshop (potentially using a pre/post test)
- If conducting a pre/post test, include a question in the post test asking what additional information or resources the clients desire, if any, to identify gaps in the workshops.

4.2.2 LOGIC MODEL AND PRIORITIZED METRICS

Figure 1 shows the CHANGES' PTLM. We describe the barriers to why LEP clients may not be able to effectively resolve energy-related problems on their own and the program's objective. A key input in the program is the CHANGES network of CBOs that act as a trusted resource in their communities. Boxes A, B, C, and D represent the Program's four main activities. The reader can follow the arrows to see what short-, medium-, and long-term goals are expected to accrue from program activity. Appendix B contains the explanation of linkages (the numbered lines) and what metrics may support measurement of those linkages. We also tie the prioritized program metrics in Table 15 to the boxes and links in the logic model.

Figure 1. Program Theory and Logic Model

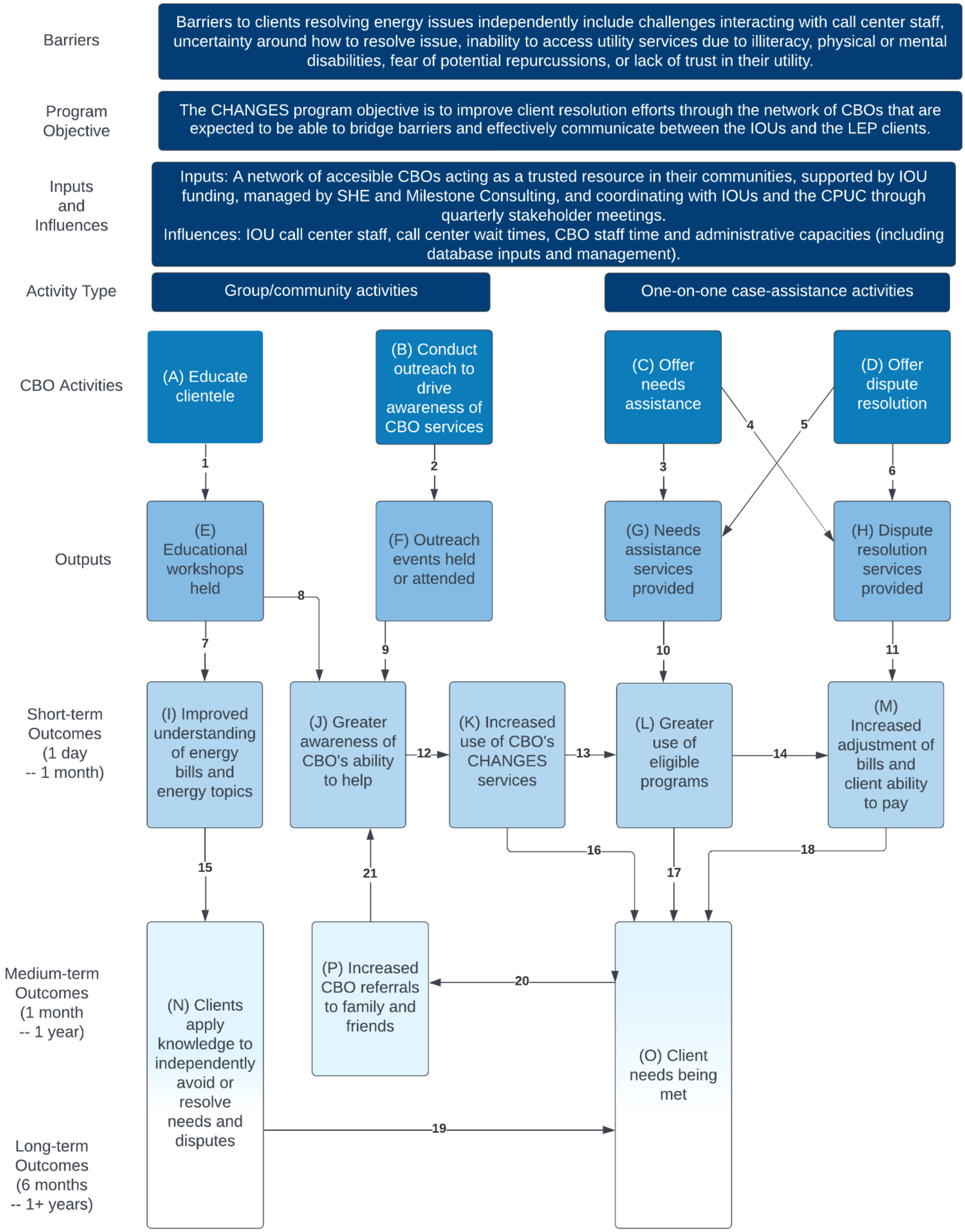


Table 15 shows a consolidated list of prioritized metrics that the evaluation team suggests should be collected and reported on for the CHANGES Program. The following metrics are appropriate and viable to assess the success of the CHANGES Program. There is a column that indicates the source of the data for the metric, and whether CBOs are already collecting and reporting upon it. There are additional metrics included in Appendix B in the linkage explanation of the logic model. We would like to bring the reader's attention to the metrics associated with Boxes N and O in the logic model, as they are particularly suited for measuring the program's medium- and long-term outcomes. These metrics generally count the number of CHANGES clients who received a CHANGES service and sought no additional services within one year, two years, or ever.

Table 15. Suggested Prioritized Metrics for CHANGES Program

Category	Prioritized Metrics	Data Source	Already Tracked?	PTLM Reference
CBO Activities	Counts of activities performed (community outreach, media outreach, educational workshops, and case assistance)	CBO tracking data	Yes	Boxes A, B, C, D
Activity Details	Topics, languages, # of people reached, # of distinct resolutions, total # of each resolution	CBO tracking data	Yes	Boxes A, B, C, D
Client Details	Basic information about the clients served, such as income, language, and referral source	CBO tracking data	Yes and no	Boxes A, B, C, D
Detailed Referrals	Statistics about the specific types of CHANGES outreach or educational events that lead client to seek case assistance	CBO tracking data	No	Links 2, 9
Program Referrals	Statistics about number of customers referred to other programs (payment plans, rate plans, LIHEAP, AMP)	CBO tracking data or that program's data	Yes	Link 10
Assistance Provided	Statistics about payment assistance (bill adjustment, one-time payment, payment plans, successfully pay off arrearages)	CBO tracking data or IOU data	No	Boxes L, M
Impact of Assistance	Statistics about repeat visits or lack of repeat visits (for same service or different service)	CBO tracking data	Data tracked, but not reported in this way	Box O
Case Resolution Status	Count of resolved, ongoing, and unresolved cases (including categorical reason case was unresolved)	CBO tracking data	Yes and no	Box O
Assistance Outcomes	Measures of knowledge following an activity or of clients applying knowledge learned, and for CBOs conducting post tests, additional information or resources the client desired	Evaluation data or CBO research	Yes, by some CBOs	Box I
Avoided Problems	Counts of avoided safety issues, disconnections, scams	Evaluation	No	Box N
CBO Performance	Measures of client satisfaction	Evaluation or CBO research	No	Box O
Outreach Content	Statistics about content of media and community outreach events	CBO tracking data	No	Box F, Link 9

4.2.3 DATA REPORTED TO IOUS

The CHANGES Program data reported to the IOUs is too high-level to be useful to the IOU staff. While the CBOs collect detailed notes about each one-on-one case assistance service they provide, including details about all services provided under one case, that level of detail is not reported to the IOUs. The IOUs report receiving a list that summarizes the total number of services rendered for a specific resolution category. IOU representatives note that the categories reported to them were not that useful because they lacked specific details about the precise issue that was resolved. If they had a one-sentence description with information on the specific issue, the IOUs may be able to improve the services they offer and avoid customers needing to contact the CBO.

In addition, it can be difficult to tell whether a resolution falls into the category of “needs assistance” or “dispute resolution.” For example, two data tracking resolution types include reference to both “needs assistance” and “dispute resolution” (and appear to be duplicative): “AMP Billing or Enrollment Problem” and “AMP Enrollment or Billing Problem.” One would assume an enrollment problem requires needs assistance services while a billing problem requires dispute resolution services.

Figure 2 is a screenshot of a table titled “CHANGES Disputes Resolutions…” that was shared with IOU staff by CHANGES program staff. IOU staff were unclear on why some of these services were classified as disputes, such as “set up new account” or “Energy Audit” for example. In these instances, IOU staff wondered whether the client had an issue with an energy audit that was performed at their home, or did they have another problem for which an energy audit was suggested to identify home improvements? Others, such as REACH, are available to customers in only one IOU service territory and staff at other IOUs may not be aware of what the program does. The evaluation team believes this lack of transparency is a naming convention issue, described in the next section, and not an indication that all listed items are disputes. IOU staff also noted that the reporting of numbers only obscures any information about recurrence (i.e., if the same client received the same service more than once). Additionally, IOU staff questioned whether an issue was actually resolved, or if a customer was repeatedly calling with the same issue. The reported metrics would be more helpful to IOU staff if they had insight into the disputes and how they were resolved.

Figure 2. Screen Shot of CHANGES Program Report Provided to IOUs

Table 2.7.1.1 CHANGES Disputes Resolution – January through October 2021	
Arrearage Management Plan	13
Assisted Client with Making a Payment	2
Bill Adjustment	11
CARE/FERA	8
CARE High Energy User Document Submission	3
CARE Recertification/Audit	2
Changed Consumer Information on Account	3
ESA Program	1
Electricity Aggregation	255
Energy Audit	10
Enroll in Energy Assistance Programs	81
Enroll in Medical Baseline	10
Gas Aggregation	248
LIHEAP	50
Meter Service or Testing	5
Other Payment Assistance (private, faith based, etc.)	8
Payment Plan	2
REACH	1
Report Scam	2
Scheduled Customer Service Visit	1
Set Up New Account	2
Set Up Online Access	2
Solar	10
Third Party Notification	9
Total	**739**
Note: The total number of services may exceed the total number of cases because some cases will include more than one service provided. Support for dispute resolutions was provided in the following languages: Cambodian, Cantonese, Dari, English, English – Native American, Farsi, Hmong, Korean, Mandarin, Pashto, Portuguese, Spanish, Urdu, and Vietnamese.	

4.2.4 ACCURACY, RELIABILITY, AND COMPLETENESS OF DATA COLLECTED

The CHANGES database is outdated and creates inefficiencies in both implementing the program and measuring performance. The CPUC has already worked with SHE and their subcontractor to make some improvements to the database. However, there is still room for improvement. The evaluation team identified a few issues with the way the data were organized or recorded that make it challenging to accurately understand client situations or services rendered, or reliably pull program data from the existing database. These eight issues included:

1. **Needs Assistance vs Dispute Resolution**: The way in which data are recorded in the software makes it difficult to accurately assess the counts of "needs assistance" versus "dispute resolution." The tracking software allows multiple selections to be made for the "Customer need/problem" as well as multiple selections for the "Solution." Therefore, depending upon how a report is pulled (based on customer problem or solution), the resulting counts for cases and solutions/resolutions vary and may not be reliable or complete. This issue is amplified due to the lack of unique IDs associated with each CHANGES client. The current structure also does not allow for mapping the initial problem to the resolution(s) or assigning a unique ID to the client. This means that the program is essentially unable to easily track the progression of an individual case from start to finish.
    a. To further highlight this point, SHE had to manually assign unique IDs and pull cases based on problem vs resolution, creating time and budget delays. These stem from database inefficiencies and issues which can impact the completeness and accuracy of the data.
2. **Naming Conventions**: There are also multiple naming conventions that can further cause confusion. Specifically, the invoices call dispute resolution "complaint resolution" and, the software reports on "Solutions," but these "Solutions" are also called "Resolutions" among program staff and within reports.

a. Further, some of the names of the resolutions are duplicative, but named differently, which results in the same service being coded under different resolutions. For example, there is both: "AMP Billing or Enrollment Problem" and "AMP Enrollment or Billing Problem." The program does not need both of these resolutions and they add to the already long list of resolutions a CBO representative must scroll through when inputting data.

3. **Too Many Options:** The list of needs and resolutions could use refinement as there are many activity options to select from. Staff members from two CBOs noted that the long list of activities and options to choose from underneath the program's core categories creates an arduous search and selection process.
4. **Unnecessary Repetition**: It was reported that some data entry fields needed to be entered more than once throughout a case. Three representatives mentioned that the required information can be "tedious" and "repetitive" and creates "double-work," given that in a lot of cases, the information has already been collected and reported in their own databases. One CBO representative mentioned that the database requires them to input zip codes more than once or select certain options more than once to move on to the next set of input fields.
5. **Language Categorization**: There are two separate categories for English. This creates the potential for inconsistent reporting. A more consistent approach would be to have English as a higher-level category which, when selected, additional options are made available to select from such as (English or Native American English). Additionally, there is another category for American Sign Language, which may sometimes be erroneously tracked as English.
6. **Field Validation**: It does not appear that the software currently uses field validation, which often is used for data such as zip code, phone number, email address, and household size. Field validation is a common tool used to decrease data entry errors. As an example, with data validation, a zip code would be restricted to five numerical characters. Upon receiving the first dataset, the evaluation team found values for the number of individuals in a household that appeared to be account numbers or phone numbers. The field for "number of household members" should not allow more than a 2-digit number, and in most situations, any number over 15 is likely an error.[15] Employing field validation in the software would improve the accuracy of the data.
7. **Reporting:** The CBOs are not able to pull reports that directly feed into their monthly invoicing. Interviewed CBO staff said they can input information into the database but cannot export summary reports of that information. They said the system has the functionality to run summary reports, but CBO staff are not authorized to use it. The "Reports" tab in the database is a secure page that requires a login, and CBO staff said that their login information does not meet the proper credentials. Due to this, staff from at least two CBOs reported they are manually copying and pasting information from the database into an Excel document, so that they can have a monthly summary or use the data for their own report templates. Representatives from these two CBOs were concerned that this manual process may introduce error.
8. **Case Notes**: Some CBO staff enter detailed case notes into the database. Four CBO staff members reported in the interviews that they enter in detailed case notes about the client situation, what they found, and the steps to resolve it. Other CBO staff echoed this sentiment, saying that the amount of information they collect and track is adequate because it has demographic details about the client, the situation the client was in, and the steps taken to resolve the issue. The case notes data, however, does not appear to be used for reporting, even though IOUs may find this information useful for program optimization.

4.3 OVERALL PERFORMANCE

In this section, we address the evaluation objective of overall program performance associated with anticipated needs of the target population. This includes an examination of who is served, how relevant/sensitive the program is to their needs, and relative benefits of each of the three functional areas: outreach activities, educational activities, and case assistance activities in serving the needs of the population. Overall, this section answers how well the program is meeting its objectives.

[15] For the purposes of the final dataset, SHE deleted any household size that was larger than 15 members and replaced with a null value.

4.3.1 PROGRAM GOALS AND OBJECTIVES

There are no established program metrics to assess overall program performance[16]. However, analysis of program activity in three programmatic areas (case assistance, outreach, and education) suggests the CHANGES Program is conducting activities aligned with its four stated objectives.

In general, goals and expectations for the program are in alignment across CBOs, the CPUC, SHE, IOUs, and implementer staff. However, some differences exist between CBO and non-CBO staff in terms of how they conceptualize the overall program goals.

The overarching goal of the CHANGES Program is to provide services to LEP consumers who need help with energy issues. [17] Supporting this goal are four main program objectives:[18]

- Help customers in the target population understand their energy bills;
- Resolve bill disputes, service issues, and avoid disconnection;
- Increase customer awareness of assistance and energy programs as well as support customer access to the programs; and,
- Teach customers about ways to save energy.

All 10 interviewed CBO representatives reported the main goal of the CHANGES Program is to provide support and assistance with energy services to LEP clients, especially low-income seniors. According to three CBOs and one non-CBO interviewee, another perceived goal of the CHANGES Program is to give clients the tools and assistance they need to handle their energy-related responsibilities independently.

Figure 3 summarizes the CHANGES Program goals mentioned by interviewed CBO staff, broken down into three categories of action: educate, advocate, and empower. Each goal is explained in more detail after the figure.

Figure 3. CHANGES Program Goal Framework as Defined Through CBO Interviews

Educate	• Educate clients on how to understand their bills, to recognize overcharges and prevent disputes • Educate clients about energy assistance programs
Advocate	• Advocate for clients during disputes • Advocate for clients who rely on trusted sources for assistance
Empower	• Empower clients to feel confident with handling their energy bills • Empower clients to be self-advocates

- **Educate**: Six CBOs mentioned a primary goal of the CHANGES Program is to educate their clients on how to understand their energy bills. By doing so, customers will be engaged in their energy services and feel confident to handle issues on their own. For instance, clients will be more likely to catch potential errors on their bill, avoid overcharges, and prevent missed payments. In addition, the CBOs aim to educate clients about enrollment in other

[16] Although there are no set metrics, the Program reports periodically on the number of case assistance services (broken down by type of service and language), number of those attending education session (by topic and language) and number of potential clients reached by community events, media, and social media. Section 4.2 discusses this in more detail.

[17] https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs

[18] Objectives stated in original SOW for this evaluation. There is no mention of objectives in the CHANGES annual reports.

energy assistance programs like LIHEAP and CARE so clients can save as much as possible on their monthly energy bills.

I believe [CHANGES] is a preventative program for people that don't know how to read bills, or contracts too. So, we are here to help to lower the bills and prevent them from getting charges that they didn't want or they didn't need. – CBO Interviewee

- **Advocate**: Three CBOs mentioned a primary goal of the CHANGES Program is to advocate for their clients, usually by calling a client's utility company to resolve a dispute on their behalf, asking clarifying questions about their clients' bills, or rectifying information or errors associated with their account. These CBOs thought clients greatly benefit from having someone guide them through the process when, otherwise, they probably would not have been able to do it on their own.
- **Empower**: Three CBOs mentioned a primary goal of the CHANGES Program is to empower their clients through education so that the clients will eventually be able to handle energy bills on their own. While many CBOs discussed that some clients frequently return for assistance, they envision clients will eventually be comfortable enough to handle issues themselves before coming to the CBO for help.

The interviewed utility, CPUC, and implementation staff viewed the Program's goals as helping LEP customers in IOU service territories with energy-related needs such as bill payments, dispute resolution, general information sharing and education, and translation services. Two organizations provided a bit more nuance in talking about the program goals. In particular, they mentioned CHANGES' role in:

- Providing energy services to LEP customers who are low-income, many of whom are seniors; and,
- Creating a trusted place for customers to go to for energy-related assistance.

4.3.2 PROGRAM ACTIVITY

Below we present key information about program activity by language, IOU, and year from the program tracking data provided by SHE. This provides the foundation to understand performance and effectiveness. **In 2019–2021, CBOs provided the most services, including outreach and education activities, in Spanish, Cantonese, English, Vietnamese, Korean and Armenian. CBOs provide more than twice as many services in Spanish than the next most-common language.** During this time, CBOs that provided CHANGES services provided at least one service in 44 different languages across the three program activity types. Table 16 displays the number of cases by language across all program activity types for the top 12 languages.

Table 16. CHANGES Program Activity Type by Language

Language	Case Assistance	Education	Outreach		Overall
	Case Assistance Events (n = 14,558)	Education Workshops (n=5,431)	Community Outreach Events (n=338*)	Media Outreach Events (n=113)	Total across all activities (n=20,440*)
Spanish	41%	29%	29%	24%	38%
Cantonese	18%	10%	12%	12%	16%
English**	12%	19%	20%	1%	14%
Vietnamese	10%	8%	11%	16%	9%

Language	Case Assistance	Education	Outreach		Overall
	Case Assistance Events (n = 14,558)	Education Workshops (n=5,431)	Community Outreach Events (n=338*)	Media Outreach Events (n=113)	Total across all activities (n=20,440*)
Korean	5%	6%	1%	20%	5%
Armenian	4%	6%	1%	8%	4%
Dari	3%	5%	1%	4%	3%
Mandarin	1%	4%	12%	5%	2%
Arabic	0%	4%	1%	0%	2%
Cambodian	2%	1%	1%	0%	1%
Hmong	1%	0%	2%	3%	1%
Portuguese	1%	1%	1%	6%	1%
All other languages	2%	7%	8%	1%	3%
Total by Activity*	**100%**	**100%**	**100%**	**100%**	**100%**

* One outreach event could cover multiple languages. Therefore the "Total by Activity" amount for Community Outreach Events does not equal 215, as it does in other tables, nor does the overall n across all activities match other tables.

** "Native American English" and "American Sign Language" are reported separately and grouped here in "all other languages." However, it is unclear if all CBOs distinguish between "English," "Native American English," and "Sign Language."

The statewide network of CBOs provided services across all four IOU territories. Given that one CBO could provide services in multiple territories, a CBO event could not be expressly linked to an IOU unless specified in the program tracking data. For case assistance (needs assistance and dispute resolution) and community outreach events, the CBOs reported the relevant IOU in the program tracking data but did not report it for educational events or media outreach events. As such, we are unable to report IOU counts for educational events or media outreach.

Table 17 outlines case assistance and community outreach events by IOU. **Overall, CBOs provided the majority of case assistance services in PG&E territory.** CBOs delivered a slight majority of all community outreach events across SCE and SCG territory, but we were unable to break out their specific percentages due to overlapping territories.

Table 17. CHANGES Case Assistance and Community Outreach Events by IOU (2019 – 2021)

IOU	Case Assistance Events		Community Outreach Events	
PG&E	9,365	64%	88	41%
SCE	2,210	15%	110	51%
SCG	2,117	15%		
SDG&E	866	6%	17	8%
Total	**14,558**	**100%**	**215**	**100%**

When looking separately at each evaluation year, CBOs consistently provided more case assistance services in PG&E territory in each year of the evaluation period (see Appendix D). Later in this report (Section 4.6.3), we discuss the IOU breakdown of program activities in relation to funding and draw further conclusions about what this breakdown means in terms of CBO activity and funding.

Over the evaluation period, CBOs assisted with 14,558 cases, held 5,431 educational events, and conducted 328 outreach events (including community outreach and media placements), per the program tracking data (Table 18). As illustrated in the table, case assistance services have increased over time whereas the number of community outreach events dropped significantly after 2019 likely as a result of the COVID pandemic and associated restrictions. Like outreach, the number of education opportunities dropped in 2020 and had not rebounded to 2019 levels in 2021.

Table 18. CHANGES Program Activity by Type (2019 – 2021)

Activity Type	Number of Events				
	2019	2020	2021	Total	Percent of Total
Case Assistance Events	3,960	4,646	5,952	14,558	72%
Education	2,584	1,299	1,548	5,431	27%
Community Outreach	168	31	16	215	1%
Media Outreach	35	46	32	113	>1%
Total	**8,766**	**8,042**	**9,569**	**20,317**	**100%**

Even with the drop in outreach events held in 2020, the number of people reached through these events increased, as shown in Table 18.[19] Although media outreach events increased at a smaller rate than community outreach decreased, the media events reached more people per event than community outreach.

Table 19 also shows that the number of clients who attended an education event decreased by half from 2019 to 2020, while the number of clients seeking case assistance increased. This decline corresponds to the drop in events that is likely attributed to the pandemic. Educational opportunities may have been limited due to social distancing guidelines and decreased customer interest. This decrease persisted with a slight bounce back in 2021, but with still significantly fewer customers attending educational events compared to 2019.

Table 19. Number of CHANGES Clients Served by Activity Type (2019 – 2021)

Activity Type	Number of Clients			
	2019	2020	2021	Total
Media Outreach	1,757,700	2,591,106	1,421,899	5,770,705
Community Outreach	699,251	41,909	16,430	757,590
Educational Workshop	39,314	19,758	23,818	82,890
Case Assistance Clients	3,515	4,121	4,977	10,831*

*Not equal to the sum of the columns due to clients participating across multiple years

CASE ASSISTANCE SERVICES

Almost 11,000 unique clients were served through one-on-one case assistance during the evaluation period, many receiving services more than once. Case assistance services include needs assistance and dispute resolution activities. Needs assistance includes services such as helping a client sign up for programs such as LIHEAP or CARE, or assisting with changes to their accounts. Dispute resolution services include helping clients work with the IOU to resolve an existing billing issue and/or correct errors.

For CHANGES database purposes, the distinction between "needs assistance" and "dispute resolution" is made at the time of the request for services. The customer problem or request type is flagged as either a dispute or a need. However, the resolutions, or the services that the client ultimately received, is not flagged as either dispute or need, but rather all grouped together as a "Resolution." The resolution does not always match the customer problem. For example, a client may come in with what they believe is a billing error, but upon a CBO representative reviewing the

[19] The people reached through community outreach is based on the total attendance for the community event (reported by the event sponsor/host), the people reached through media outreach is based on the estimated viewers/readers/listeners (reported by the media outlet) and the people reached through case assistance or education is based on the people that attended the workshop or received the service.

charges with them and explaining their rate structure, identifies that no error occurred and helps them instead apply for financial assistance programs. Given this data structure, we report on resolutions, which are not tied to any needs or dispute flag in the CHANGES database.

There are three different levels of observations for case assistance services:

- Number of unique clients that received assistance services[20]
- Number of cases that were resolved, as one client could receive assistance across multiple different cases if they received services at different times
- Number of resolutions per case, as one case could have multiple resolutions.

CBOs provided case assistance services to 10,831 unique clients from 2019 through 2021. Some of these participants received assistance multiple times through multiple case events, and others received multiple resolutions during one case assistance event. There was a total of 14,558 case events and 18,033 resolutions over the evaluation period. Table 20 shows the relationship between unique clients, unique cases, and resolution activities. Of unique clients, 77% only participated in one case assistance event and less than 3% participated in more than four case assistance events. One client received assistance 34 times.

Table 20. Case Assistance Relationships Between Cases, Clients, and Resolutions

	Mean	Median	Min	Max
Case assistance event per client	1.3	1	1	34
Resolutions per case assistance event	1.2	1	1	6
Resolutions per client	1.7	1	1	34

All 27 CBOs that participated in the CHANGES Program provided at least one case assistance service over the three years in this study. One CBO conducted only one instance of case assistance while another conducted over 2,000. Over the three years, most CBOs' case assistance services have held steady if not increased. See Appendix D for a breakdown of the number of clients, cases, and resolutions provided by CBO by year.

REASONS CLIENTS SEEK ASSISTANCE

Clients seek assistance for reasons aligned with the program objectives, which are to improve client resolution efforts through CBOs that can effectively communicate between the IOUs and the LEP clients. The primary reason clients seek support from the CBOs is financial assistance with high energy bills or soliciting advice on how to save on their energy bills (9 of 10). According to CBO interviews, common reasons clients seek energy-related assistance from CBOs include the following:

- Enrollment in energy-bill assistance programs, such as AMP and CARE
- One-time financial assistance to pay energy bills, such as LiHEAP
- Help with disconnection notices and other disputes
- Assistance with understanding gas aggregation charges
- Assistance with general understanding of energy bills and charges

[20] This number can be counted as 1) unique customers across the evaluation period n = 10,831 or 2) unique client by year, which then when summed for 2019, 2020, and 2021 is higher than the evaluation period (n = 12,613). The first is a more accurate representation, for the overall evaluation purposes, but we do report out at times by calendar year.

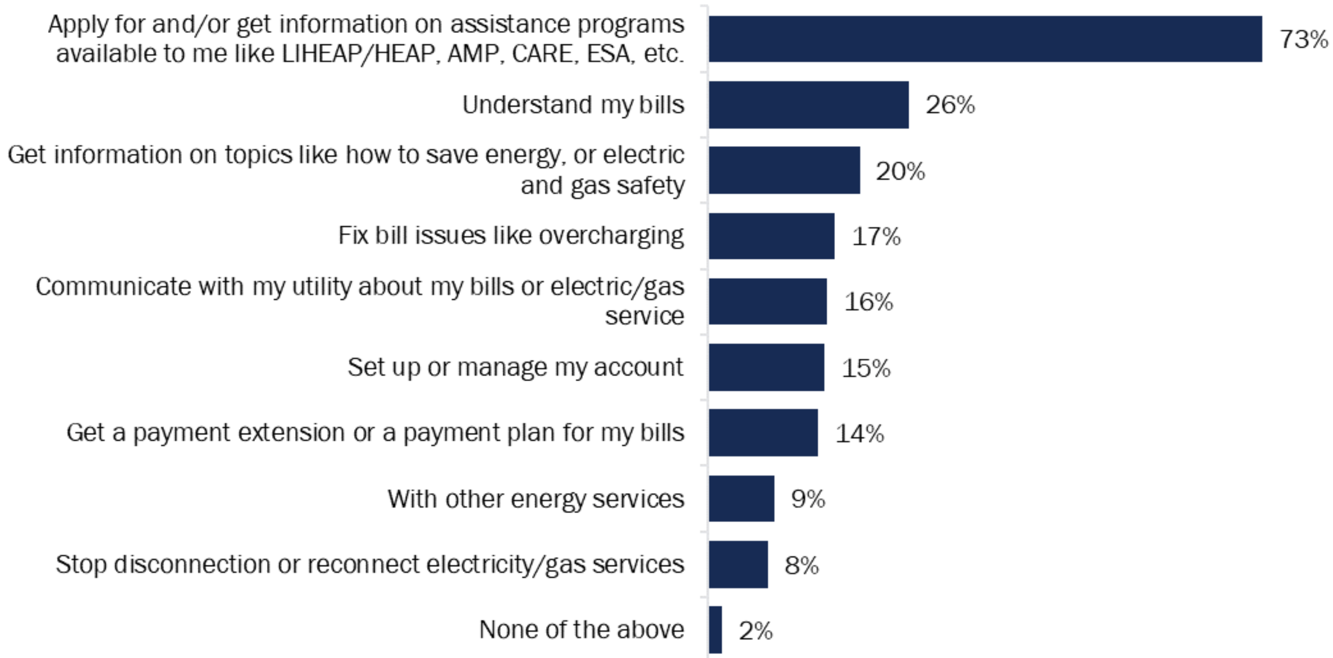
CBO staff felt challenged when asked to put numbers on what percent of CHANGES clients seek energy-related services versus the staff identifying an energy need. One interviewed CBO staff member shared, “I would say nine out of ten times, they're seeking it [energy-related help] versus me doing outreach or offering it to them.” A different CBO staff member reported, “help with paying off their bills – that’s the number one major thing [they come to us for].” Others said that CHANGES clients “mostly” or “usually” seek financial help with their energy bills. There was only one interviewed CBO who reported that, “Most of them come in for something else [other than energy assistance].”

Nevertheless, there are clients who go to the CBOs for reasons other than energy assistance. For example, a client may schedule an appointment to apply for a rental assistance program. During that time, a case manager may then recognize they qualify for other services, such as low-income energy assistance programs. Some of the non-CHANGES services clients look for typically include:

- Job placement
- Housing and/or rental assistance
- General translation and interpretation services
- Medical care such as behavioral health, primary care, and dental care

Findings from surveyed CHANGES clients echo these results. Figure 4 shows that nearly three-quarters (73%) of survey participants reported receiving help in applying for assistance programs like LIHEAP or CARE. The next most common service they received was help understanding their utility bills and teaching them about topics like how to save energy or avoid safety issues. This indicates that the program is intervening to help clients address bill issues and correct them, so they avoid getting to the point where they receive a disconnection notice.

Figure 4. CBO Energy-Related Services Provided to Survey Participants (n=216)



According to program data, over a third of CHANGES Program clients who received case assistance were referred by a friend or family member (36%). Mass media and community outreach accounted for 14% of referrals, while other programs and CHANGES workshops account for 15% and 13% of case assistance referrals, respectively (Table 21). Since 2019, referrals from mass media have increased, at the same time referrals from community outreach events have decreased.

Table 21. CHANGES Program Case Assistance Referral Sources (2019 – 2021)

Referral Source	2019	2020	2021	Evaluation Period	% Of Total Referrals
Friend or Family	1,151	1,525	2,093	4,769	36%
Another Program	458	494	976	1,928	15%
Community Outreach	717	645	502	1,864	14%
Mass Media	237	512	1,045	1,794	14%
CHANGES Workshop	618	658	400	1,676	13%
Another CBO	335	184	145	664	5%
Special Outreach Project	14	209	77	300	2%
Received TEAM	129	25	30	184	1%
Total Referrals	**3,659**	**4,252**	**5,268**	**13,179**	**100%**

We examined the most common case resolutions reported in the program tracking data to better understand the clients' needs and to assess alignment with what the CBOs reported. Fifty-nine resolution types existed between 2019 – 2021. Resolutions are not easily categorized into needs assistance or dispute resolution, given the current system set-up and existing naming conventions. Therefore, we are unable to categorize the common resolutions into those categories in the following table.

Table 22 shows the number of case assistance events that were provided by the top 20 most common resolution types from 2019 – 2021. The most common resolution provided across the three years was Low Income Home Energy Assistance Program (LIHEAP) support, with six times more cases reported than the resolution type with the second most reported cases, electricity aggregation (see Appendix D). The top resolutions align with the reasons CBOs offered for why clients are seeking help.

Table 22. Case Assistance Events by Resolution Type (2019 – 2021)

Resolution Type	2019 Cases	2020 Cases	2021 Cases	Total Cases
LIHEAP	1,531	1,947	2,709	6,187
Electricity Aggregation	365	403	259	1,027
Assist with Changes to Account	291	418	183	892
Gas Assistance Fund (So Cal Gas Only)	158	453	265	876
Payment Plan (Not AMP)	428	220	168	816
New Arrearage Management Plan (AMP)	0	0	802	802
Gas Aggregation	130	253	275	658
REACH (PG&E Only)	48	249	349	646
CARE/FERA	63	165	318	546
Changed Bill Language	137	208	179	524
Medical Baseline Application Assistance	176	202	146	524
Neighbor to Neighbor (SDG&E Only)	99	290	111	500
Payment Extension	215	151	113	479
Refer to Energy Assistance Programs	212	201	52	465
Stop Disconnection	347	104	10	461

Resolution Type	2019 Cases	2020 Cases	2021 Cases	Total Cases
ESA Program	134	128	133	395
Changed Third-Party Company	232	19	8	259
Energy Assistance Fund (So Cal Edison Only)	43	115	94	252
Medical Baseline	5	2	210	217
Set Up New Account	45	45	59	149
Other Resolutions (not top 20)	237	270	851	1358

Some CBO clients needed assistance more than once for the same energy-related issue. Those returning clients are largely in need of some sort of financial assistance. The resolution types with the highest average frequency by unique customers were related to payment and financial assistance issues (e.g., “Assisted Client with Making a Payment,” “LIHEAP,” “Gas Assistance Fund,” and “Energy Assistance Fund”) (Table 23).

Table 23. CHANGES’ Repeat Case Assistance Clients by Resolution Type

Resolution Type	Cases	Unique Participants	Repeats by Resolution
Assisted Client with Making a Payment	34	21	1.62
LIHEAP	6187	5095	1.21
Gas Assistance Fund (So Cal Gas Only)	876	722	1.21
Energy Assistance Fund (So Cal Edison Only)	252	218	1.16
REACH (PG&E Only)	646	574	1.13
Payment Extension	479	428	1.12
Assist with Changes to Account	892	809	1.10
Arrearage Management Plan – Follow-Up	72	67	1.07
ESA Program	395	371	1.06
Payment Plan (Not AMP)	816	767	1.06
Assist w/ CARE Recertification/Audit	85	80	1.06
Energy Audit	35	33	1.06
Assisted with Closing Account	18	17	1.06
Gas Aggregation	658	622	1.06
Set Up New Account	149	141	1.06
Changed Consumer Information on Account	104	99	1.05
Changed Bill Language	524	500	1.05
Neighbor to Neighbor (SDG&E Only)	500	482	1.04
Assisted with CARE Certification/Audit	28	27	1.04
Stop Disconnection	461	446	1.03
New Arrearage Management Plan (AMP)	802	776	1.03
Medical Baseline	217	210	1.03
CARE/FERA	546	529	1.03
Other Payment Assistance (private, faith organization, emergency fund, etc.)	139	135	1.03
Medical Baseline Application Assistance	524	509	1.03
Changed Third-Party Company	259	252	1.03
Refer to Energy Assistance Programs	465	454	1.02

Resolution Type	Cases	Unique Participants	Repeats by Resolution
COVID-19 Emergency Utility Payment	100	98	1.02
Rate Plan Selection Assistance	101	99	1.02
Electricity Aggregation	1027	1007	1.02
Energy Efficiency Tool	110	108	1.02
Solar	74	73	1.01
Bill Amount Adjusted	110	109	1.01

OUTREACH AND EDUCATION ACTIVITIES

CBOs conduct community outreach at public events such as farmers markets, parades, and cultural events. Media outreach includes advertising placements in channels such as radio, TV, and newspapers. Additionally, they provide education through workshops.

Please note that the estimated numbers of people reached from community events and media placements is reported by the event host or the media outlet, not the CBO. The number of people reached through community outreach events is based on the total attendance for the community event; it is not based on visits to a CBO or CHANGES table. For media outreach, it is similarly based on the total estimated listeners, viewers, or readers. The reach of the educational workshops, on the other hand, is reported by the CBOs and is based on the number of signatures collected on sign-in sheets at each individual workshop.

Below, we provide a snapshot of these activities. See Appendix D for detailed tables on each activity.

COMMUNITY OUTREACH

CBOs held 215 community outreach events over the evaluation period. Table 24 provides a snapshot of this activity.

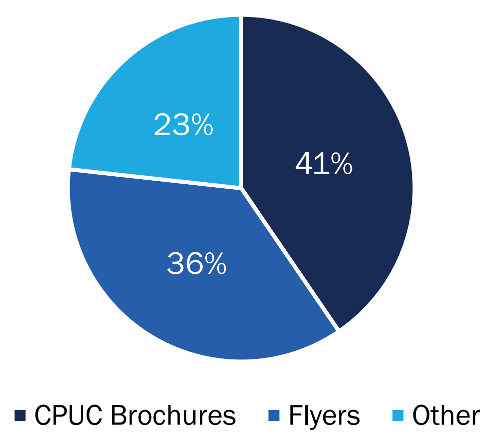
Table 24. Snapshot of Community Outreach Activity

Key Outreach Event Metrics	Results
Range of Outreach Events Hosted per CBOs	Min: 0, Max: 34
Number of Events	215
Number of Clients Reached/Engaged	Approx. 757,590
Range of Clients per Outreach	Min: 50, Max: 500,000
Majority Languages	Spanish, English, Cantonese
Number of CBOs That Hosted Outreach	23
Number of Languages	21

Some examples of outreach events are a Japanese New Year Celebration in Little Tokyo in 2020 that reached ~10,000 people, a Wellness Health Fair which reached 300 people, and a “Tacos and Taxes” event which reached 50 people. Most events reached 750 people or less, although one reported to have reached 500,000 people. The number of people reached through community outreach are estimates and not exact counts.

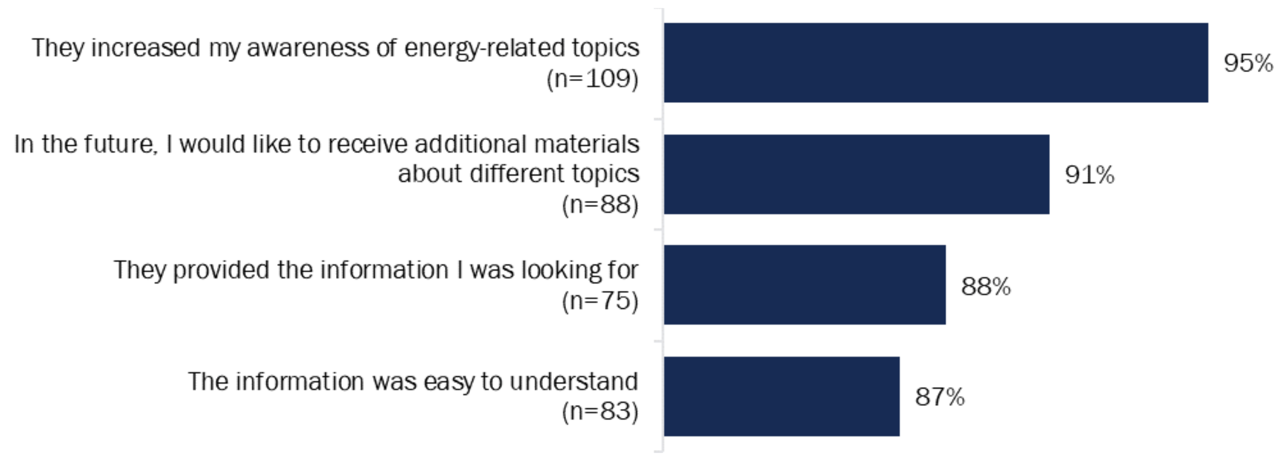
Materials were provided at these outreach events, which primarily (77%) included brochures and flyers. In the interviews with CBO staff, they reported that these materials were designed to entice visitors to talk with the CBO staff, educate clients, or otherwise remind clients about the CBO and their services. Figure 5 shows the distribution of materials provided across all events.

Figure 5. Materials Provided at CHANGES Community Outreach Events (n=215)



Overall, survey participants found the printed materials they received to be informative and easy to understand (Figure 6). Nearly two-thirds of survey participants (62%) indicated they had received some materials, though 16% did not recall. Of those who received materials, nearly all (95%) agreed that the materials increased their awareness of energy-related topics, while a large majority (87%) agreed that the information was easy to understand.

Figure 6. CBO Client Perceptions of Printed Materials



MEDIA OUTREACH

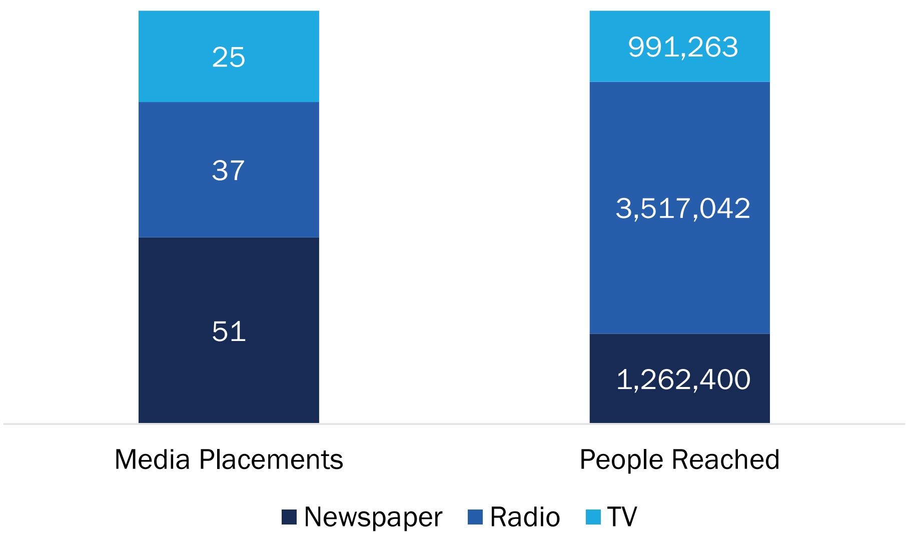
CBOs conducted 113 media placements over the evaluation period. Table 25 provides a snapshot of this activity.

Table 25. Snapshot of Community Outreach Through Media Placement Activity

Key Media Placement Metrics	Results
Range of Media Placements per CBOs	Min: 0, Max: 14
Number of Placements	113
Number of Clients Reached/Engaged	Approx: 5,770,705
Range of Clients per Outreach	Min 5,000, Max > 2 million
Majority Languages	Spanish, English, Cantonese
Number of CBOs Who Hosted Outreach	19
Number of Languages	11

CBOs conducted media outreach via three main channels: newspaper, radio, and TV. Figure 7 depicts the breakdown of people reached and media placements by channel. The CBOs submitted 113 media placements, reaching 5,770,705 people over the three years. Fifty of the placements were in the newspaper (45%) but these only represented 22% of people reached. While 33% of media placements went through radio, they accounted for 61% of people reached. CBOs conducted the least amount of outreach via TV, which represented 22% of events and 17% of people reached.

Figure 7. Breakdown of CHANGES-related Media Placements and People Reached by Channel



EDUCATIONAL WORKSHOPS

All of the CBOs participating in the CHANGES Program conducted educational workshops focusing on issues ranging from understanding utility bills to assistance programs and energy conservation. Table 26 provides a snapshot of activity in this programmatic area over the study period.

Table 26. Snapshot of Educational Workshop Activity

Key Workshop Metrics	Results
Range of Workshops Hosted per CBOs	Min: 20, Max: 456
Number of Events	5,431
Number of Clients Reached/Engaged	>80,000
Majority Languages	Spanish, English, Cantonese
Average Event Size	15 participants
Number of CBOs who hosted Educational Events	27

Educational events comprised eight topics, as shown in Table 27. The most common was "Understanding your Bill" with other common topics including "CARE & FERA/Other Assistance Programs," and "Avoiding disconnection/ Payment Options/Billing Cycle." The least popular educational event was "Level Pay Plan", based on both the number of events held and the number of participants who attended. The number of educational events dropped in 2020 on all topics likely due to the COVID-19 pandemic.

Table 27. CHANGES Educational Workshops Held by Topic

Topics	Total Participants	Total Events
Understanding your Bill	21,498	1,683
CARE & FERA/ Other Assistance Programs	17,620	1,049
Avoiding Disconnection/ Payment Options/ Billing Cycle	10,817	641
Energy Conservation	7,843	498
High Energy Usage	7,676	472
Safety	7,102	414
Gas Aggregation	5,677	373
Level Pay Plan	4,657	301
Total	**82,890**	**5,431**

COVID-RELATED IMPACTS

COVID-19 impacted all three functional areas but has had a more lasting impact on offering outreach and educational activities to the target population. Many outreach events that were previously conducted in-person were cancelled or scaled back. Educational workshops were also cancelled if they could not be effectively transitioned to a virtual setting. However, CBO representatives mentioned that virtual events were not as effective as in-person events since many seniors did not have a way to attend these online gatherings. Additionally, during COVID, there was a moratorium on shut-offs, which likely led to a decrease in the need for dispute resolution.

"Before the pandemic, we did lots of outreach and lots of education. And during this time we have reduced a tremendous amount of outreaches and education. We have not been doing much education because of how we don't have enough space for the six feet to mask wearing and all that. And people don't feel comfortable coming out as much so that the education has decreased tremendously" — CBO Interviewee

"During the pandemic, I probably saw no more than 20 clients over the phone. They never know how to use Zoom or anything like that. So everything we had to do in-person." – CBO Interviewee

"Most of the seniors, they don't know how to scan a bill, or show an e-bill... [we] reopened right after the close-down, lockdown." – CBO Interviewee

The COVID-19 pandemic forced many CBOs to switch from primarily in-person assistance to mostly virtual services while mandated lockdowns were in place; however, most CBOs have transitioned back to majority in-person assistance. Case assistance, as described earlier, has increased year over year, indicating that the pandemic did not decrease activity in that area, but perhaps instead has fueled an increase.

Table 28 details the number of CBOs interviewed who offered in-person, virtual, or hybrid services before and during the COVID-19 pandemic, as well as at the time of the interview in September 2022. Half of the CBOs switched to virtual services during the height of the pandemic, and five remained open for in-person services. As of September 2022, seven CBOs offered mostly in-person services and three offered hybrid services.

Table 28. Service Delivery Format to Clients

Format	Pre-COVID-19	During COVID-19	As of Sept. 2022,
In-Person	9	5+	7
Virtual*	0	5	0
Hybrid**	1	0	3

*"Virtual" refers to most services being offered on-line versus in-person.

**"Hybrid" refers to 50% of services being offered in-person and 50% virtually.

+One CBO briefly offered only virtual services, but quickly reopened to mostly in-person two months later.

While the pandemic affected how CBOs delivered services to their clients, a few CBO representatives emphasized that assisting their clients, especially low-income seniors, could not have possibly taken place in a purely virtual capacity. Many seniors are not capable of receiving assistance online since their limited digital skills prevent them from using virtual meeting platforms or sharing important documents over email.

In addition, a few CBO representatives mentioned that they either had to significantly scale back outreach and education events, switch them all to virtual platforms, or cancel them altogether. However, most of those events, just like client services, have transitioned back to being in-person as of the time of interviews (September 2022).

While the pandemic undoubtedly affected all areas of life, interview data indicate that the CBOs and SHE/Milestone were flexible and adapted as best they could given the circumstances. Demand for case assistance services increased, while understandably so, outreach and education declined.

4.3.3 PERCEIVED VALUE AND BENEFITS OF PROGRAM ACTIVITIES

Across both participating CBOs and clients, case assistance activities and their associated benefits were viewed as the most important and valuable aspect of the CHANGES Program. From the CBO perspective, these services were seen as critical to ensuring that clients receive support and assistance to which they are entitled and that billing or other service-related errors are fixed.

In interviews, CBO representatives ranked the value of CHANGES services to their clients (Table 29). CBO representatives said the dispute resolution service had the highest value because their clients had urgent issues with potentially serious consequences that they were unable to resolve on their own. Needs assistance was also rated as extremely valuable to clients. Although it could be perceived as less urgent than dispute resolutions, it is still something the client needed solved for them. Educational workshops and outreach were rated the lowest, but the rating was still quite high, with the lowest average value of 4.0 out 5.0 for outreach.

Table 29. Perceived CBO Value of Client Services (n=8)

Service	Average Value*
Dispute Resolution	5.0
Needs Assistance	5.0
Educational Workshops	4.6
Outreach	4.0

* Ranking using a scale where 1.0 was "not at all valuable" and 5.0 was "extremely valuable"

One of the interviewed implementation staff shared their perspective of the program's value and benefits:

> *"Imagine that you're stuck with something that you didn't do and now you have to pay for something that you shouldn't, and then you don't have anybody else to go to. That's where we come from and we make sure that people are being treated right and [that] they have a voice." – CBO Interviewee*

CBOs also highlighted the following benefits of case assistance services for their clients:

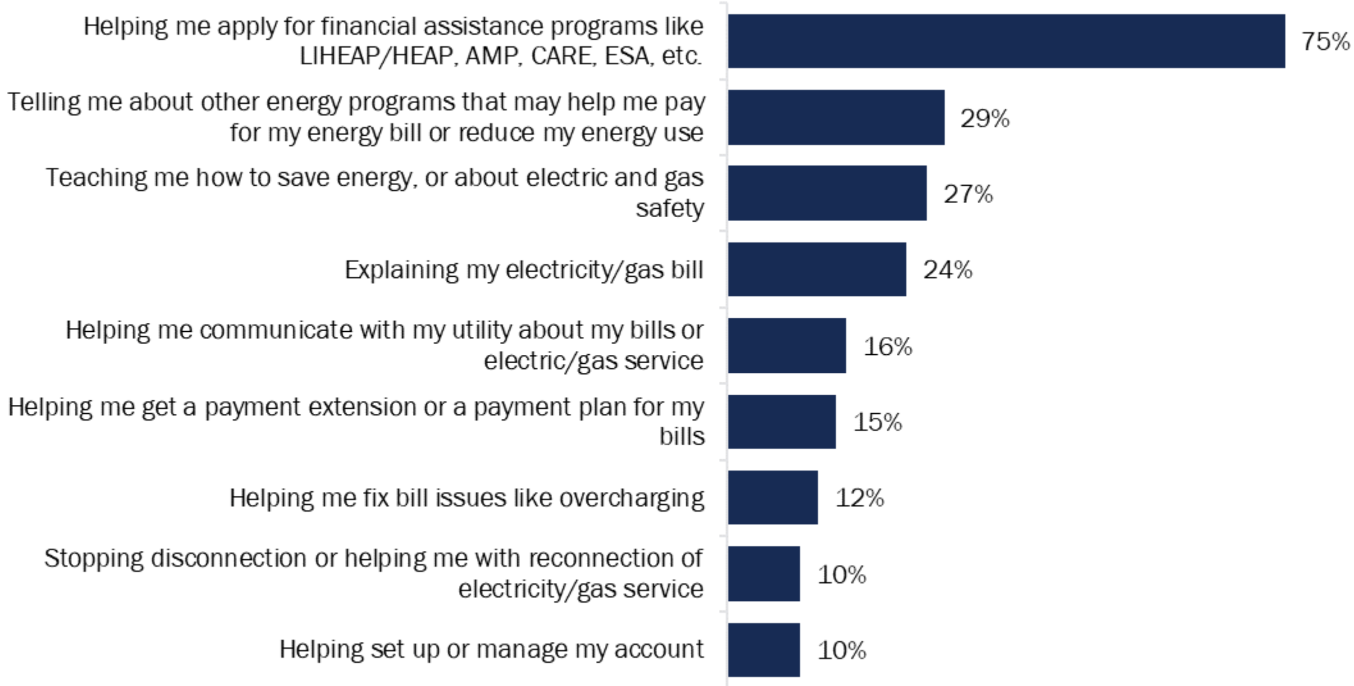
- **Accessing different utility rates and payment plans.** Through the CBOs, clients can access favorable rate plans that lower their monthly bills, such as CARE or medical baseline. Clients can also lower their monthly amount on a payment plan or avoid a deposit that is requested. For low-income families, the monetary assistance can make a big impact in their monthly budget, helping them to afford other necessities.
- **Avoiding disconnection.** Disconnections are very disruptive to clients, their households, and their quality of life. When the CBO staff are able to successfully keep a client's energy connected, it is a big relief to those households. Despite the moratorium on shutoffs during COVID, CBO staff reported that clients still approached them with disconnection notices.
- **Advocacy for disadvantaged clients.** Seniors with limited abilities, or those who are sick often do not have the energy or ability to dispute and defend their argument to a utility representative. When the CBO staff, who are better resourced and abled, can contact a utility representative, it is a big help to senior clients.

Interviewed CBO staff described the program as "vital," "critical," "invaluable," and "high-value." Without the program, CBO representatives would not be able to provide the indispensable assistance their clients heavily rely on.

> *"I think it's a program that definitely provided great assistance, that without it, a lot of these folks wouldn't know where to go to get the assistance and would fall behind or get disconnection notices." — CBO Interviewee*

These sentiments were echoed by clients, who cited the ability of the CHANGES Program to connect them with critical financial assistance as a key benefit (Figure 8).

Figure 8. CBO Services that Survey Participants Find Most Helpful (n=212)

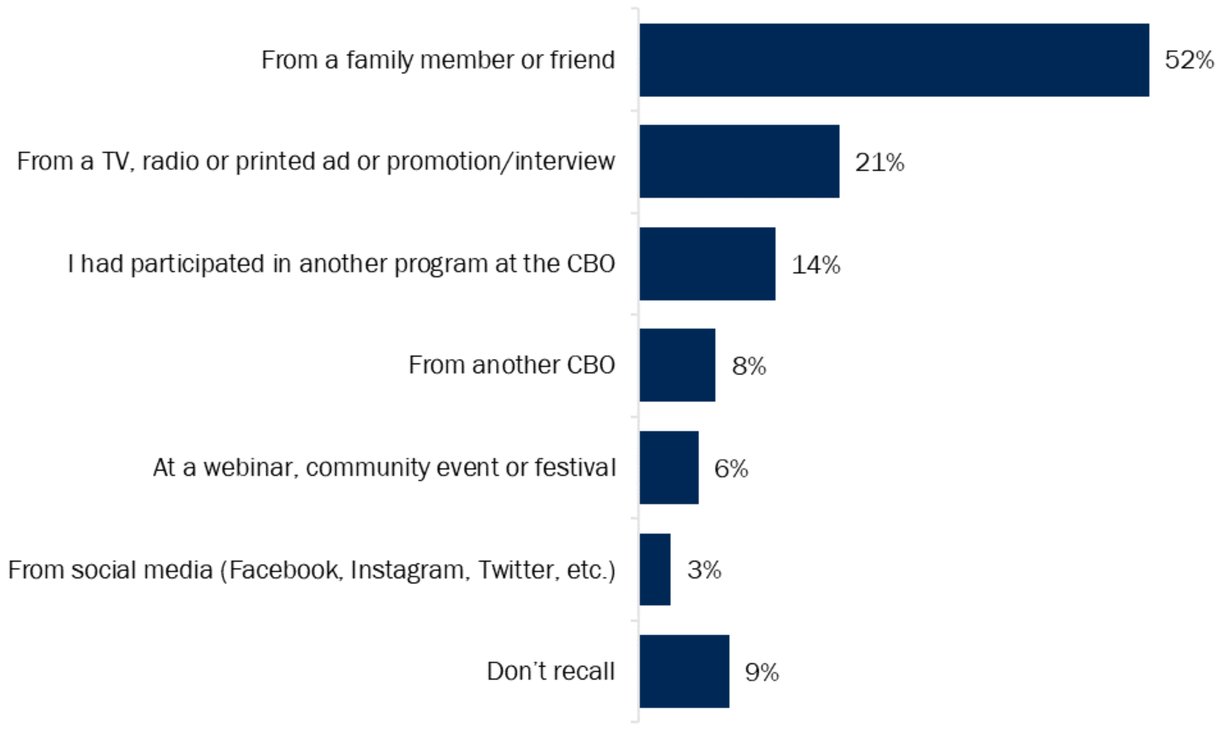


Given the relative level of programmatic activity across the functional areas, the evaluation team and CBO representatives did not discuss the benefits of outreach activities and educational workshops in-depth. In general, the anticipated benefits of educational workshops include clients having a better understanding of their energy bills such that they can identify issues on their own or safely use their electricity and gas services.[21] The anticipated benefits of community and media outreach are spreading awareness of CHANGES CBOs and the energy-services they offer so that clients access any support they may need. While formal outreach drives fewer new clients to CHANGES than word-of-mouth activities, driving participation in the program is still a benefit of that activity.

Survey responses of CHANGES clients corroborated the sentiment that outreach was not a primary driver in connecting clients to the CBOs, but it did account for a sizeable minority of clients learning that the CBO provides energy-related services (Figure 9). While over half (54%) said they learned about energy-related help at the CBO from a friend or family member, about one-fifth (21%) of clients heard it from a media advertisement.

[21] The benefits of educational workshops were not explored through the participant survey, because we surveyed CHANGES clients who received one-on-one case assistance services.

Figure 9. How CHANGES' Clients Heard About Energy-Related Services Offered by CBOs (n=214)

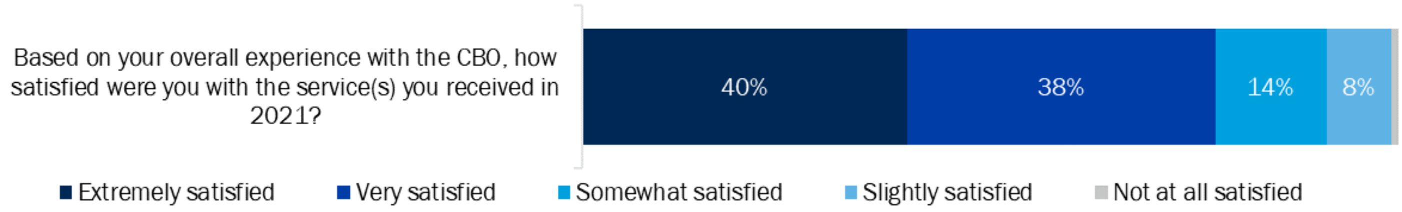


Note: Multiple responses allowed

CUSTOMER SATISFACTION

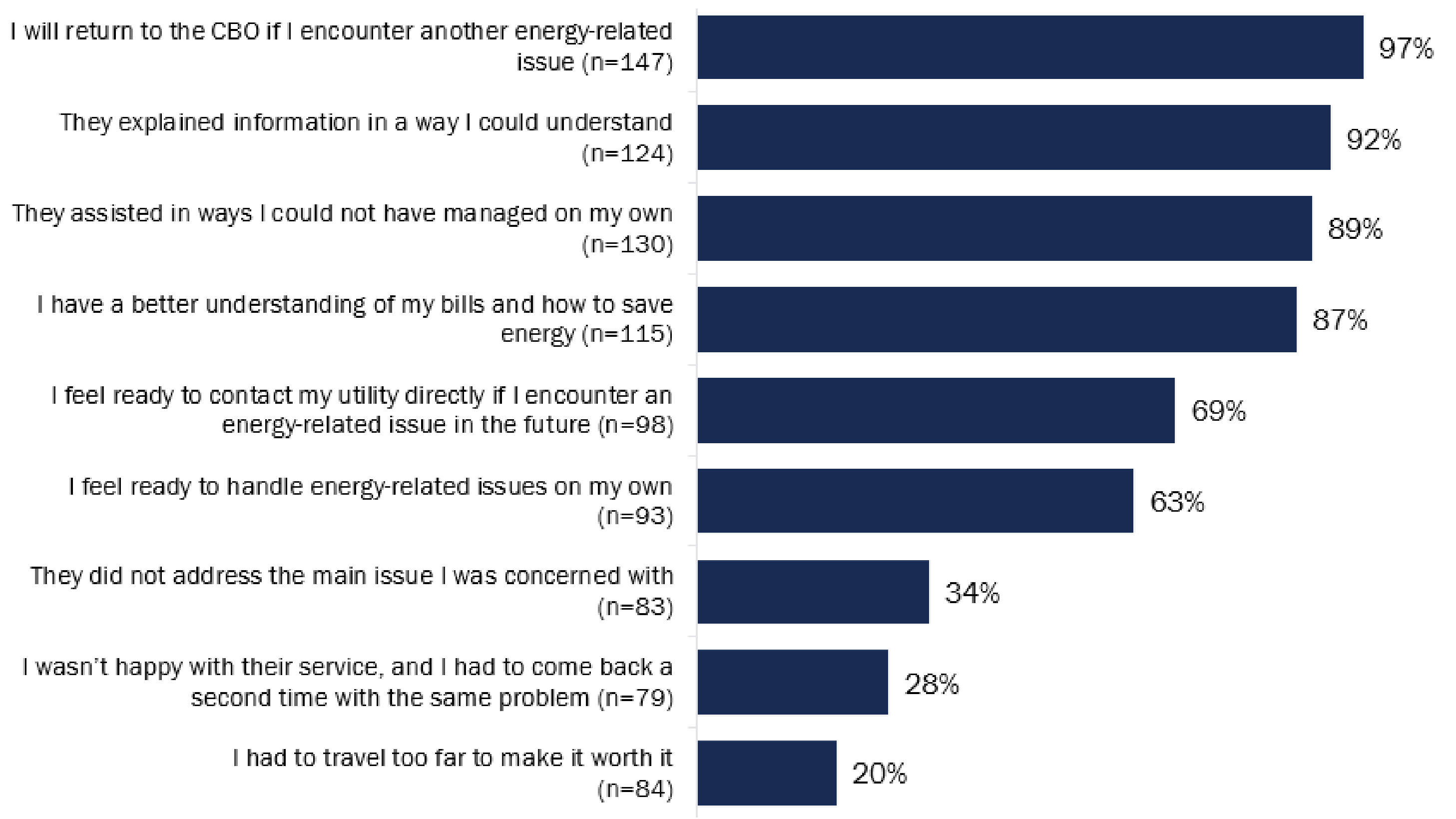
Nearly all surveyed CHANGES clients were satisfied with the services they received at the CBO, based on their overall experience (Figure 10), with over three-quarters (78%) being "extremely satisfied" or "very satisfied." Fewer than 1% were "not at all satisfied" with the services they received.

Figure 10. Client Satisfaction with CBO Services (n=213)



When asked to provide feedback about their last interaction with a CHANGES CBO (Figure 11), nearly all (97%) clients surveyed reported they would return to the CBO again if they had another energy-related issue. A similar proportion (92%) said that the CBO explained information in a way that they could understand; while others said that the CBO staff assisted them in ways they could not manage on their own (89%) and that they now have a better understanding of their bills and how to save energy (87%). A minority of surveyed CHANGES clients said the CBO did not address their main issue, had to return to the CBO a second time for resolution, or felt that the distance traveled was not worth the services received.

Figure 11. Client Feedback on Overall Experience with CBO



Consistent with the CHANGES Program's word-of-mouth referrals and high levels of satisfaction among participants, most (83%) surveyed clients were "extremely likely" or "very likely" to recommend the CBO and its energy-related services to a friend, family member or coworker (Figure 12). Only two survey participants reported they were "not at all likely" to recommend the CBO.

Figure 12. Likelihood to Recommend CBO and Its Energy-Related Services (n=211)

4.3.4 PERCEIVED BARRIERS TO ACHIEVING PROGRAM OBJECTIVES

We explored to what extent the program is meeting its objectives through staff interviews, as well as the barriers CBO staff face. **We found that all CBOs are working towards meeting the program's four objectives, however there are some barriers to meeting them.**

One challenge to meeting LEP client needs was when clients who resided outside of IOU territories approached CBOs for energy-related help. The CBOs are not reimbursed for assisting clients who reside outside of the four IOU territories, and, unless they can use other funding to support those clients, some CBOs could not provide energy-related services to those individuals. Some CBO representatives wished they could assist clients who are served SMJUs or municipal electric companies, including those in Los Angeles Department of Water and Power (LADWP) territory. For one CBO, about 10% of their clients come from these non-IOU electric utilities.

> ***"Each city, Colton or Riverside Public Utility, they have their own utility company, and we cannot assist them because it's not under CHANGES. So we try to help as much we can, but there are some barriers because, like I have clients that come from Colton, and then we do the application and stuff, but we can't bill for it." – CBO Interviewee***

A few CBO representatives mentioned that some of the education and outreach materials, such as the informational brochures and fact sheet flyers provided by SHE or the CPUC, could benefit from improved English-to-non-English translations and should be updated more frequently.

> ***"Most of the materials are kind of outdated…I would say, at least a majority of them are at least maybe five to seven years old. I think it would be nice if we were able to get regular flyers sent over… that are most relevant to our population." – CBO Interviewee***

Lastly, CBO representatives also mentioned their delivery of needs assistance could be improved by equipping CBOs with the ability to provide ad hoc emergency bill payments to clients who are in immediate financial need. One CBO reported the available funds are "first come first serve" and are exhausted before they can help everyone in need.

The interviewed non-CBO representatives had limited insight on whether the program was meeting its stated objectives because most of them had not seen metrics that would demonstrate attainment of objectives. As mentioned previously, this may be in part because there are no established program metrics to assess overall program performance towards objectives, and no objectives or performance goals stated in CHANGES annual reports.

The few non-CBO representatives who did offer opinions suggested that the program was working as intended. One IOU staff member mentioned that the program was "doing what it is intended to do," which is to help LEP customers in their service territory. Another non-CBO staff member said that some CBOs are doing a great job at assisting customers, but others have some room for improvement. They also mentioned an uptick in education and outreach efforts following the restrictions of the COVID-19 pandemic, which they were happy about.

4.4 UNIQUE PROGRAM VALUE

To understand the unique value of the CHANGES Program, the evaluation team examined the extent to which the Program is duplicative and/or the key gaps the program fills. We explored whether program duplication exists by speaking with IOU and CBO representatives, as well as surveying CBO clients who received case assistance in 2021.

From the interviews and survey data, we found that the CHANGES Program, as a whole, provides a valued service to LEP communities. While some of the outcomes of the CHANGES Program are duplicative of IOU services, the approach is different and fills a key gap for culturally sensitive language services related to energy needs.

In-language customer support is available to LEP consumers through the IOUs and the CHANGES Program. Both channels aim to help consumers resolve late bills or other disputes, enroll in payment plans, and get answers to energy-related questions. The IOUs largely address these customer needs through their call center while the CHANGES Program provides hands-on, in-person support to individuals in need.

- **IOU Services:** The primary way the IOUs provide non-English services to LEP customers is through their call center, on what they describe as a "language line." Customers can call a toll-free number, and request to speak to someone in a non-English language. The customer is connected with a translator who translates what they say to the English-speaking call center staff. In addition, each IOU operates, or has operated, a CHANGES-specific help line for use by CBOs. This line varies by IOU, but the underlying premise is that CBOs can directly call an IOU representative that is familiar with the CHANGES Program and/or has additional understanding or training on the issues LEP customers face.
- **CBO Services**: The primary way the CBOs provide non-English services to LEP customers is through their staff, many of whom are native speakers of the language in which services are offered.

Three of the four IOUs said that services provided through the CHANGES Program were duplicative to services the IOUs already offer, specifically in-language and translation services for activities such as handling a late bill, enrolling in a payment plan, answering general questions and inquiries, or handling other disputes or energy-related matters. Additionally, IOU representatives noted that some low-income programs such as CARE/FERA also conduct outreach in languages other than English. A fourth IOU representative viewed the CHANGES Program as an "additional channel" for customers to access assistance rather than it being a purely duplicative service.

CBO representatives were unanimous in their opinion that the services they provide through the CHANGES Program are not duplicative to IOU services offered to LEP customers. All interviewed CBO staff felt that the IOUs' language lines were inadequate to meet the needs of LEP customers. They also emphasized several unique characteristics of the services CBOs provide to clients that are missing from the IOU language line, including:

- *Cultural sensitivity*. CBOs stressed that their clients, especially low-income seniors and first-generation immigrants, seek out their services because they do not feel comfortable talking to the utility themselves. Reportedly, LEP clients often feel more comfortable talking to someone who is a member of their community and has a deeper understanding of their situation, which is often missing from the in-language services the IOUs provide.

> ***"If you can have someone from your community who you can have a relationship with a little bit and feel a little bit more comfortable… that makes a huge difference." – CBO Interviewee***

- *Advocacy*. CBO staff emphasized their role as an advocate for CHANGES clients. For instance, in the matter of a dispute resolution, CBO case managers can directly assist or handle disputes on behalf of their clients to resolve problems like overcharges or failed payments. IOU interpreters through the language line are not allowed to advocate; they are only allowed to translate what they heard. Many LEP customers have trouble communicating what help they need and are unlikely to challenge the authority of the utility representative, making simple translation inadequate to resolving their disputes.

- *Trust.* By providing a culturally sensitive environment, CBOs can foster a strong sense of trust between themselves and the clients they serve. This trust makes clients comfortable and willing to approach the CBO with their energy needs and concerns. In addition, some clients are undocumented and are extra cautious about trusting anyone with personal information, such as citizenship status.

> ***"We do have some undocumented clients. They are just very wary of who they can trust. [We have] been a very trusted community here…, we're very well known. People come to us for so many services that we don't even provide, but because they trust us. So I think trust is one big thing of why they choose to come to us." – CBO Interviewee***

- *Holistic case management.* Unlike the IOUs, the CBOs can help their clients holistically. For instance, if a LEP client comes in for rental assistance, case managers can recognize when CHANGES services would benefit them, or vice versa. This identification and recognition of energy needs means that clients are getting help when they might not have even realized they needed help.

In terms of the direct communication lines established by the IOUs for CBOs serving LEP customers through CHANGES, the CBOs interviewed generally like having access to the CHANGES lines, although the lines do not always work as intended. CBO representatives reported that sometimes no one picks up and the call is re-routed to the general call center, or the representative who answers is not familiar with CHANGES. Nonetheless, given that CBOs are not reimbursed for actual time spent resolving a dispute or assisting with a need, having a direct line with shorter wait times and a representative who is knowledgeable about CHANGES is beneficial to the CBOs and clients.

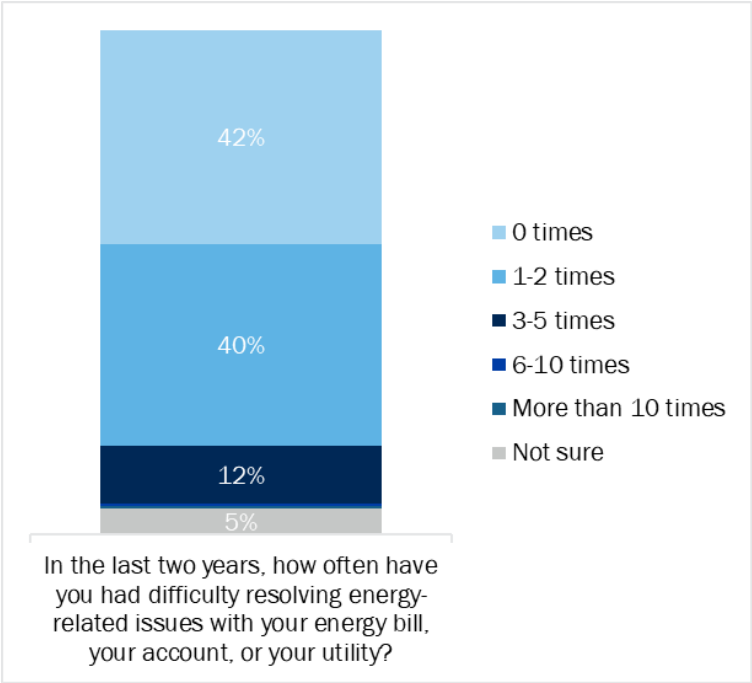
> ***"Many of the customers [feel] intimidated by the utility reps. Many of them [feel] that they weren't getting their questions answered of they were not getting assistance. And so once we became involved, then we became their voice not just to handle that matter, but to teach them to be self-advocates." – CBO Interviewee***

Complementing the perspective shared by CBO representatives, CBO clients also indicated the unique value of the CHANGES Program through multiple survey questions.

All surveyed CHANGES clients received energy-related case assistance from a CBO in 2021, per program tracking data. As reported earlier in the customer satisfaction section of this report (4.3.3), the majority of survey participants (89%) said that CBO staff assisted them in ways they could not manage on their own.

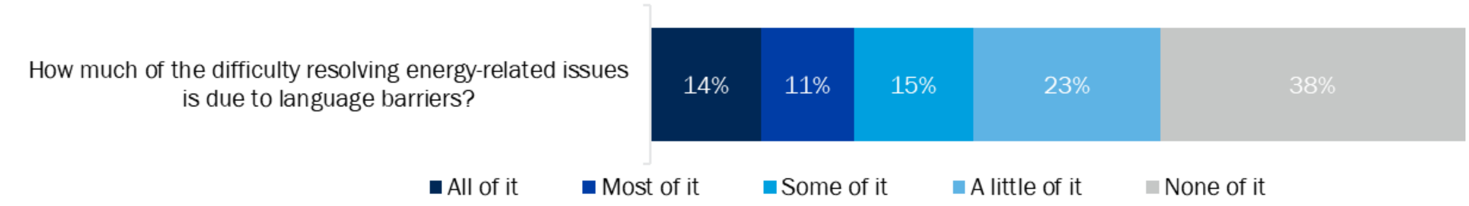
To understand the difficulty that clients had resolving issues with their energy bill, account, or utility within the last two years we asked survey participants to report the number of times they had difficulty resolving energy-related issues. More than half of surveyed CHANGES clients reported having difficulty resolving energy-related issues with their energy bill, account, or utility within the last two years (Figure 13). Forty-two percent reported they did not have difficulty resolving energy-related issues, indicating that their issue or need was resolved easily. Some clients experienced difficulty resolving their issues multiple times, though this was a minority.

Figure 13. Frequency of Difficulty Resolving Energy-Related Issues (n=198)



We then asked all survey participants about language barriers. For nearly two-thirds (63%) of non-English speakers (those survey participants who completed the survey in Spanish, Cantonese, Vietnamese or Korean), language barriers contributed to the difficulty in resolving their energy-related issues (Figure 14). One-quarter (25%) said that either “most” or “all” of their difficulty resolving their energy issue was due to language barriers. Those speaking Cantonese and Korean reported the strongest language barriers, as 29% of Cantonese (18 of 61) and 50% (4 of 8) of Korean speakers reported “all” or “most” of the barrier is from language barriers.[22] Other than English speakers, Spanish speakers were the least likely to report that language was a barrier to resolving their energy issues with 65% stating that “none” of the difficulty was due to language. Overall, 38% of non-English speakers reported that “none” of the difficulty they faced when resolving an energy-related issue was due to a language barrier. It is unclear whether these customers turned to the CBOs for other non-language related reasons (computer literacy/online applications/comprehension of energy-related concepts), if the CBO is already bridging the language barrier for them, and thus, the difficulty solving energy-related issues lies elsewhere (even with the CBO’s help), or some other reason.

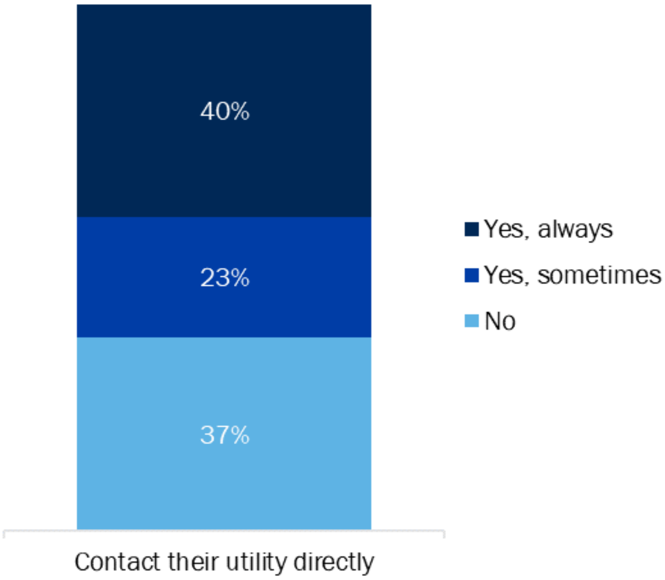
Figure 14. Language Barriers for Non-English Speakers (n=96)



When asked if they contact their utility directly when they have an energy-related issue, nearly two-thirds of CBO clients (63%) reported “always” or “sometimes” contacting their utility. There is almost an even split between the percentage that “always” contact the utility directly (40%) and those who do not contact the utility directly at all when they have an issue (37%).

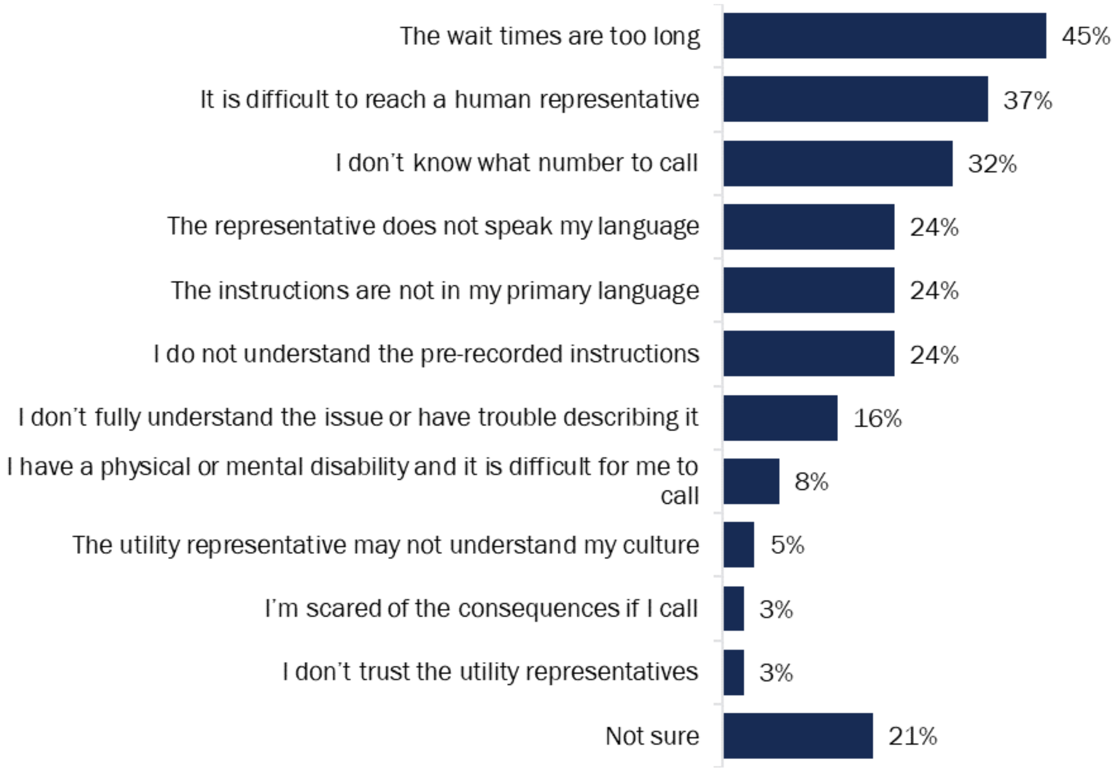
22 We caution the reader in interpreting these figures, as the sample size of Koreans is particularly small (n=8).

Figure 15. Percent of Clients Who Contact their Utility Directly When Having an Energy-Related Issue (n=104)



Among the 38 survey participants who reported not contacting their utility directly when they have an issue, reasons why they do not connect centered around challenges using the IOU's call center and reaching a customer service representative (Figure 16). Nearly half mentioned that the wait times are too long, while more than one-third found it difficult to talk with a human representative. Consistent with an earlier finding, language barriers were a challenge for one-quarter of participants. Not understanding the pre-recorded instructions or language challenges with the instructions or representative were reported by 24% of participants. Notably, cultural issues, trust, and fear of consequences were not main reasons for not contacting their utility. Only 5% of participants stated that the utility representative may not understand their culture and only two respondents (3%) cited lack of trust or fear of consequences which prevented them from calling the utility directly.

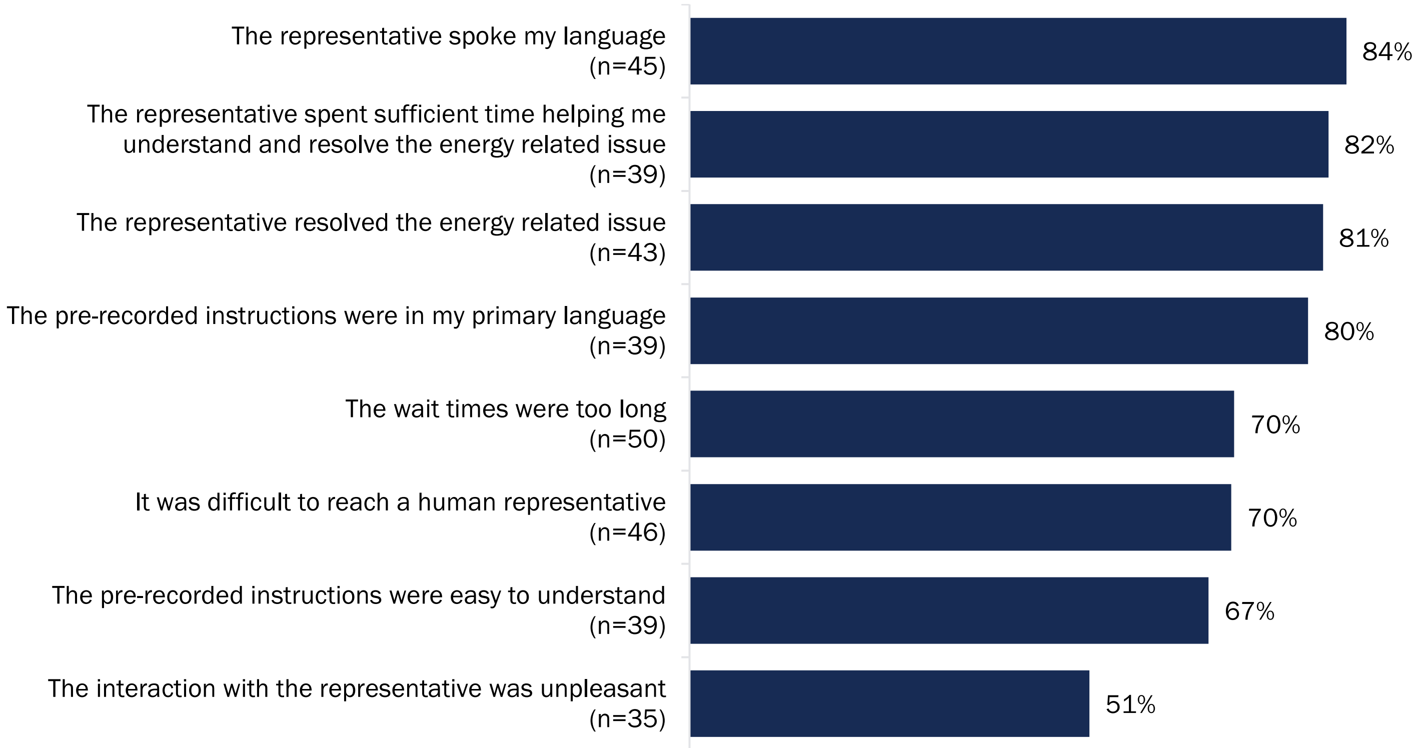
Figure 16. Reasons Why Survey Participants Do Not Contact Utility Directly (n=38)



Note: Multiple responses allowed

Most of those who reported they contact their utility directly were able to get assistance in their language during their last interaction with their utility (84%, 38 of 45). Of these participants, 29% (11 of 38) were English speakers, while the rest spoke Cantonese (37%, 14 of 38), Spanish (32%, 12 of 38), or Korean (3%, 1 of 38). The majority were also able to get their issue resolved (81%, 35 of 43), though half (51%, 18 of 35) reported their interaction with the representative was unpleasant (Figure 17). We also see a majority of those who indicated contacting their utility directly reporting that the wait times are long (70%, 35 of 50) and it was difficult to reach a human representative in their last interaction with the utility (70%, 32 of 46).

Figure 17. Feedback on Last Interaction with Utility*



*Survey participants were asked if they agreed with each of the statements and instructed to mark "Yes" or "No." Additionally, they were instructed to not answer if a statement did not apply to them, therefore the 'n' differs for each statement.

Expanding upon earlier points, while a minority of survey participants (40%) indicated they always contact their utility directly when having an energy-related issue, it should be noted that that all surveyed participants received 1:1 case assistance through CHANGES in 2021. It is not known if they learned how to resolve their issues through CBO case assistance first and now contact the utility directly, if they always first attempt to call their utility and then turn to the CBO, or any other sequences of events. Of the surveyed CHANGES clients who provided feedback on their last interaction with their utility, many reported they were able to get their issue resolved. Half reported this experience to be unpleasant. Challenges such as it being difficult to reach a human representative and wait times being too long were reported by both those who contact their utility directly and those who prefer not to. The CBOs appear to be more effective at serving the needs of LEP clients, as survey participants reported high levels of satisfaction with the services they received and 89% of survey participants reported that the CBO staff assisted them in ways they could not manage on their own. The CBOs offer unique services which include having an advocate that is easily accessible and knowledgeable. This is not the same as making someone available by phone that speaks your language.

In sum, from the interviews and survey data, we found that the CHANGES Program, as a whole, provides a valued service to LEP communities and fills a key gap for culturally sensitive language services related to energy needs. Some of the outcomes of the CHANGES Program are duplicative of IOU services, especially for English-speakers. Although some outcomes may be similar, the approach is different and focuses on cultural sensitivity, advocacy, fostering trust, and offering holistic case management services. This finding aligns with Decision D.15.12-047,[23] which states that the "CHANGES Program is not a duplication of, nor a replacement for, the services provided through the IOUs [or the] Commission …."

Given limitations to the evaluation scope, the evaluation team was unable to compare all program offerings at the IOUs and other organizations across CA to fully assess and document where overlap exists for case assistance, education,

[23] https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs

and outreach. Additionally, the program tracking data indicate that English was one of the top languages in which case assistance, education, and outreach services were provided. This language group is not in need of language services but receives services from the CHANGES Program. Future research could assess whether there is a disproportionately high level of duplication of services for English speaking clients. Furthermore, future research could inform improvements to IOU service delivery and help identify additional ways for IOUs to improve their language offerings, especially for services that are duplicative.

4.5 PROGRAM OPERATIONS AND STRUCTURE

In this section, we address the evaluation objective of understanding program operations and structure. This includes an examination of the effectiveness of SHE, discussing the distribution and coverage of the CBO network, and identifying potential ways to refine and improve the delivery and management structure of the services CHANGES seeks to provide.

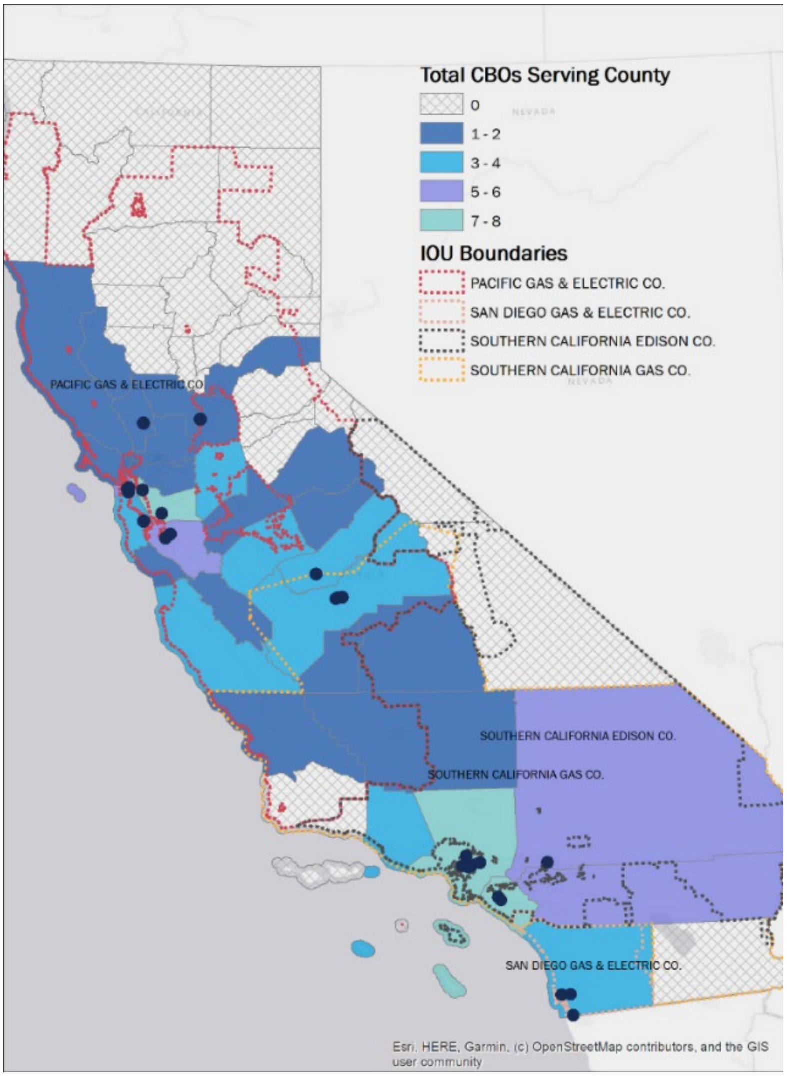
4.5.1 GEOGRAPHIC DISTRIBUTION OF THE CBOS AND CLIENTS SERVED

Understanding the distribution of participating CBOs throughout the state and the clients served is foundational to assessing the effectiveness of program structure and operations. Twenty-seven CBOs participated in the CHANGES Program from 2019 to 2021. These same CBOs also serve the Telecommunications Education and Assistance in Multiple-Languages (TEAM) Program. This shared CBO network between programs is intended to provide "consumers a 'one-stop shop' for education and assistance on telecommunications and energy services."[24] The CBOs that make up the network were not recruited based on geography, but instead on a set of CBO characteristics including, but not limited to, having an organizational mission that includes serving immigrant or LEP community, being fluent in languages they provide core services in, being culturally competent, and being able to blend TEAM and CHANGES services.

While SHE has not previously recruited based on geography, CPUC staff reported that in the last contract with SHE, (2019) it is now listed that any replacement CBO should be identified in an underserved area. As such, identifying underserved areas is important for any replacement CBOs. Figure 18 shows the location of each of these CBOs on a map of California, along with the IOU territories. The CBOs are represented by dots while the color shading of each county represents the number of CBOs serving that county. The IOU boundaries are outlined. See Appendix C for a zoomed-in version of the map highlighting the Bay Area and Southern California as well as Appendix E for a table of all CBOs and the counties they serve.

[24] https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs

Figure 18. CBO Location by County



In general, the CHANGES network of CBOs has good coverage throughout the state. There are three main concentrations made up of 27 CBOs that participate in the CHANGES Program. Ten of these CBOs are in and around the Bay Area, four CBOs are in Central California and 13 CBOs are in Southern California. Within Southern California, there are two CBO clusters in Los Angeles and in San Diego. CBOs can serve multiple counties and, conversely, counties can be served by multiple CBOs. The counties served at the highest rates include Alameda and Los Angeles, which are both served by 7-8 CBOs. San Bernardino, Santa Clara, and San Francisco are also served by many CBOs (5-6). Many other counties are served by less than four CBOs, and some are only served by one CBO or none.

While the CBO mapping provides useful information for understanding the distribution of CBO coverage within the network, there are a few limitations:

- Information on counties served is self-reported by CBOs, which may introduce error and potential bias into the map.
- The map shows coverage at the county level. This provides a high-level view of geographical coverage, but coverage may not be uniform within the counties.

We explored potential CBO resource constraints to better understand the dynamics of a changing CBO network. According to staff interviews, it would be challenging to accommodate new CBOs in the network due to resource constraints. Any expansion of the program to include new CBOs or serve more clients would need to also provide for more implementer staff. The implementer staff serve as a critical resource for the CBOs to train them, to provide ongoing support for difficult client situations, and oversee their monthly reporting and invoicing.

LEVEL OF CBO ACTIVITY

The level of activity across CBOs varied dramatically. Five CBOs each conducted over 1,000 activities during the study period while the remaining 22 CBOs conducted between 33 and 900 activities (Table 30). The types of activities that CBOs conducted also varied. Consistent with findings presented earlier in the report, community and media outreach accounted for a very small proportion of activity, anywhere between 0% and 5% of all activities for each CBO.

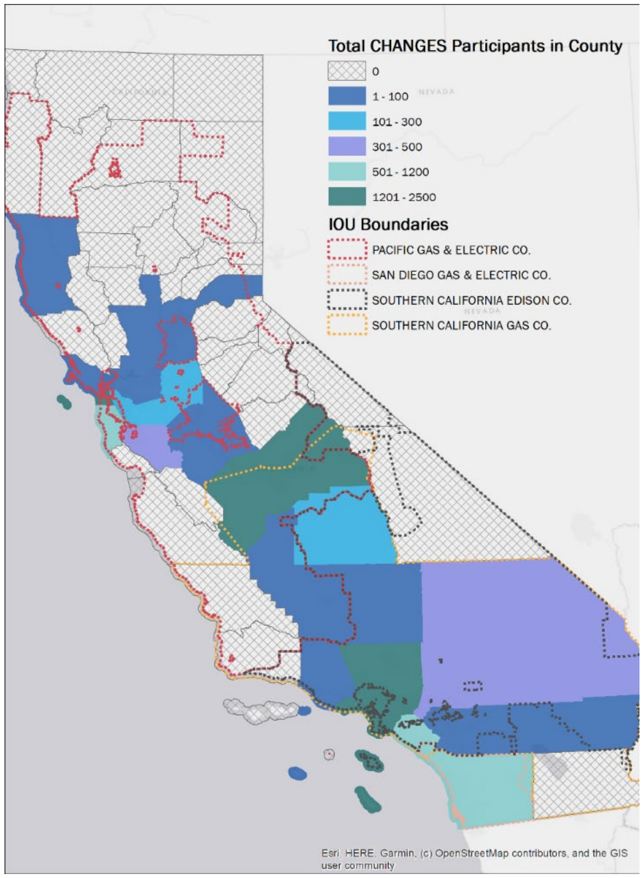
Table 30. CHANGES Program Activity by CBO

	Case Assistance Event	Education Workshops	Community Outreach Events	Media Outreach Placements	Total
CBO 1	2170	110	7	5	2292
CBO 2	1287	230	2	11	1530
CBO 3	1056	424	9	4	1493
CBO 4	1059	365	0	4	1428
CBO 5	672	456	3	9	1140
CBO 6	751	188	27	0	966
CBO 7	560	329	4	9	902
CBO 8	766	88	18	1	873
CBO 9	702	123	13	1	839
CBO 10	721	83	16	10	830
CBO 11	565	227	5	3	800
CBO 12	628	155	11	5	799
CBO 13	131	652	0	0	783
CBO 14	403	282	6	5	696
CBO 15	362	235	34	14	645
CBO 16	488	141	12	3	644
CBO 17	430	109	12	0	551
CBO 18	386	139	14	1	540
CBO 19	423	102	1	8	534
CBO 20	304	102	0	0	406
CBO 21	296	102	0	0	398
CBO 22	3	323	1	0	327
CBO 23	242	71	7	6	326
CBO 24	1	203	7	7	218
CBO 25	133	64	2	7	206
CBO 26	8	107	3	0	118
CBO 27	11	21	1	0	33

Note: Case assistance “events” refers to unique cases across the three years, not individual clients, or resolutions. One case assistance event could contain multiple resolutions and one client could be served through multiple cases.

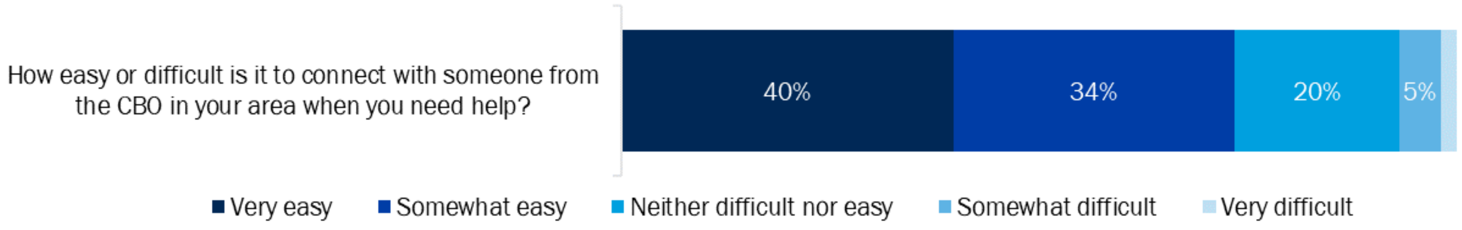
The CHANGES Program served clients distributed throughout the IOU service territories with few pockets of limited activity. As illustrated in Figure 19, case assistance activity is spread throughout the state. However, there has been little to no case assistance activity in portions of PG&E’s northern territory and the central coast, SCE’s northeastern territory, and SCG's southeastern territory. As described in section 4.5.2, the lack of participants does not necessarily equate to a lack of services needed.

Figure 19. CHANGES Case Assistance Clients by County



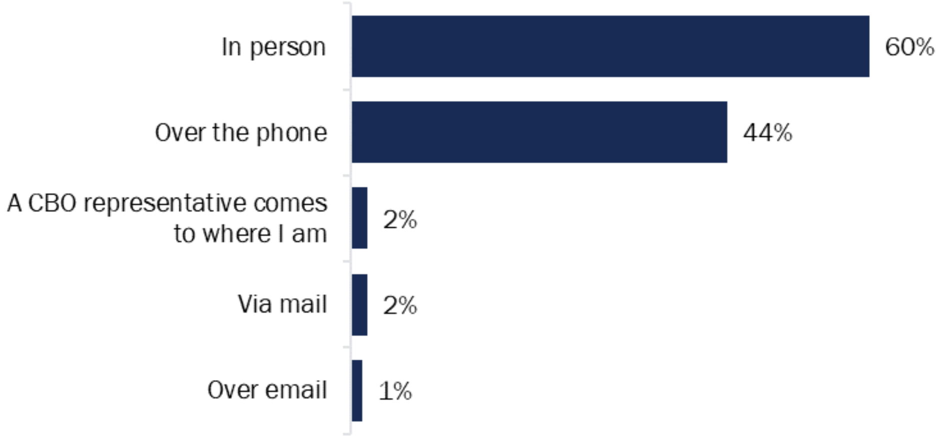
To understand the potential scope of geographic barriers to accessing program services, we asked survey participants questions about difficulty connecting with a representative from their CBO, how they connected (in-person, phone, etc.), and how far they traveled, if they went in-person. For a majority of surveyed CHANGES clients (74%), it was easy to connect with someone from the CBO in their area when they needed help (Figure 20). Very few clients (7%) reported difficulty connecting with a CBO representative.

Figure 20. Ease or Difficulty Connecting with Someone from a CBO (n=214)



Surveyed CHANGES clients were most likely to have contacted a CBO representative in-person at the CBO offices (60%), though nearly half called the CBO (44%, Figure 21). Very few clients used other communication methods (5%).

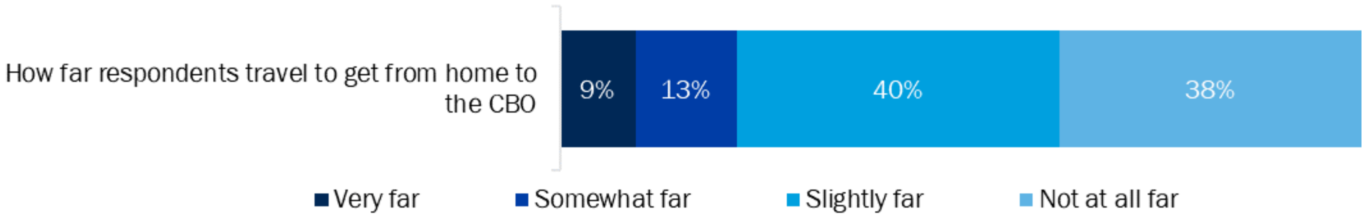
Figure 21. How CHANGES Clients Contacted the CBO (n=212)



Note: Multiple responses allowed

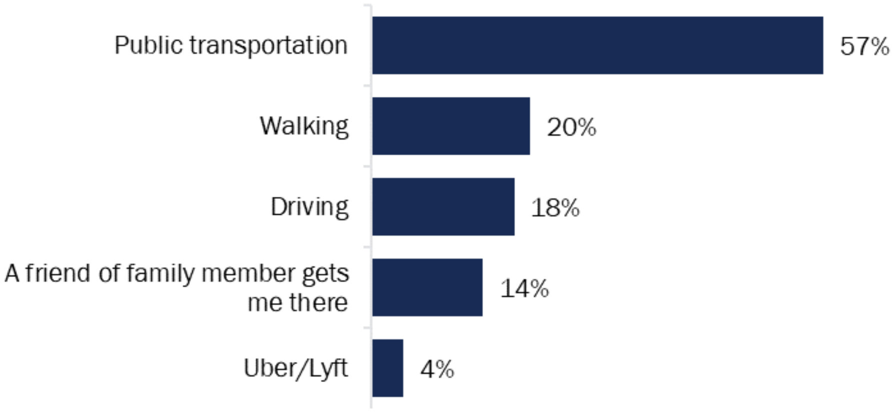
Geographic proximity to a local CBO was not an immediate barrier for most CHANGES participants. Most surveyed CHANGES clients do not have to travel far to reach their local CBO, if they were to visit in person (Figure 22). Fewer than one-quarter of clients (22%) had to travel "very far" or "somewhat far" to get to the CBO.

Figure 22. Distance Clients Traveled to Get to CBO



Given the location of participating CBOs, most clients are able to utilize public transportation to access in-person services (Figure 23). Fewer drive themselves or have a friend or family member drive them there.

Figure 23. How CHANGES Clients Get to a CBO (n=124)

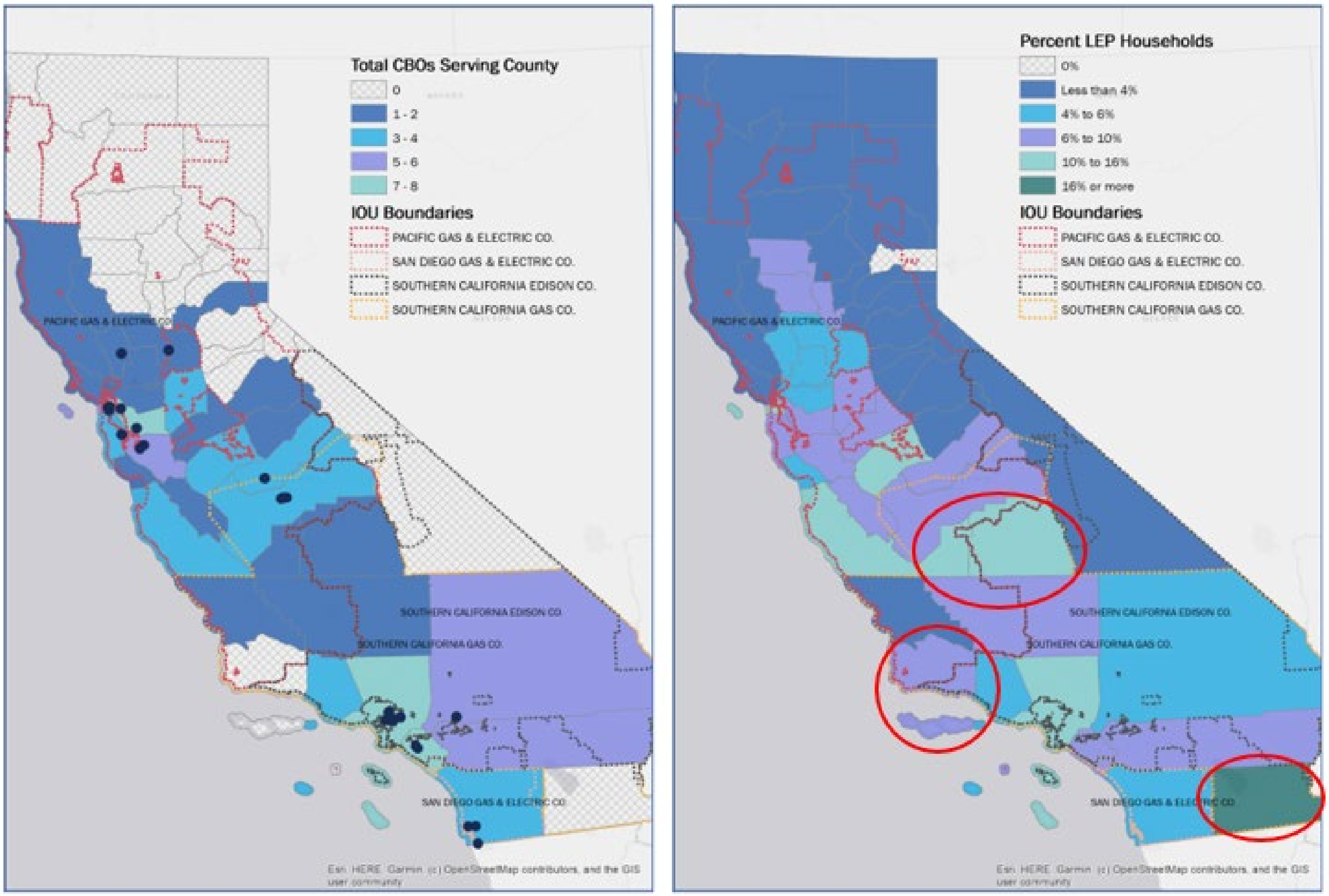


Note: Multiple responses allowed

4.5.2 CBO NETWORK OPTIMIZATION

The optimal distribution of CBOs in the network throughout California involves balancing the support provided by CBOs with the demand for their services. To assess this optimal distribution, the evaluation team used CBO-serviced counties as a proxy for support provided and LEP households as a proxy for demand. This approach allows for a high-level visual review of coverage as it relates to customer needs across the state. Figure 24 shows two maps side-by-side, the left map shows the CBO distribution and counties served and the map on the right illustrates the percent LEP households across California. Counties with low to no CBO coverage that have a relatively high percent of LEP households are circled in red.

Figure 24. Potential Unmet Needs for CBO Coverage



While this visual approach is helpful to identify general areas, the population density of counties also must be considered when identifying the optimal network. Regions with smaller populations may be sufficiently served by one CBO but other locations may need multiple CBOs to meet the needs of eligible households. To incorporate this consideration, the evaluation team estimated the number of LEP households in each county (% LEP HH * Total HH) and compared the potential demand with the available support (# of CBOs serving the county).

Table 31 shows the number of LEP customers per CBO per county. This table displays the top 12 counties that might have the highest need for additional CBO coverage, based on the comparison of LEP households to serving CBOs. See Appendix E for the full table.

Table 31. LEP Households per CBO by County

Counties	Total Households	% LEP Households	LEP Households	CBOs	LEP Households per CBO
Los Angeles County	3,358,408	12%	412,521	8	51,565
Kern County	265,348	10%	25,500	1	25,500
Contra Costa County	410,654	6%	23,058	1	23,058
Sacramento County	578,810	6%	36,278	2	18,139
San Diego County	1,140,481	6%	71,127	4	17,782
Santa Clara County	653,266	10%	66,876	5	13,375
Riverside County	713,344	9%	61,738	5	12,348
Orange County	1,008,329	8%	83,474	7	11,925
Fresno County	312,546	10%	31,124	3	10,375
Tulare County	131,376	16%	20,586	2	10,293
Imperial County	43,278	23%	9,976	0	-
Santa Barbara County	151,922	7%	11,019	0	-

There are 24 counties in California that do not have any CBO coverage. These counties have an average of 1,330 LEP households per county. Of the counties that do not have any CBO coverage, Santa Barbara and Imperial County have the highest potential demand with 11,019 and 9,976 households, respectively. Los Angeles County has over 400,000 LEP households and, despite coverage by eight CBOs, still has 51,565 LEP households per CBO. Other counties have fewer LEP households than Los Angeles but were only covered by one or two CBOs, resulting in a high ratio of LEP households to CBOs. The CHANGES program could consider expanding their network for these unserved and underserved counties.

It is important to note that CBOs may not be able to serve all the potential CHANGES clients in the counties listed, as services are restricted to clients served by IOUs. Or, if they do serve clients outside of those served by IOUs, they are not reimbursed for it. For example, while many residents of Los Angeles County are served by SCE, multiple cities within the county are served by other municipal utilities. This is true for the city of LA, which is served by the Los Angeles Department of Water and Power. Table 31 lists LEP households by county, not IOU territory, to demonstrate potential need across the entire state of California. **Expanding to areas outside the IOU territories would allow the CBO network to serve more clients in need.**

Continuing to increase understanding of the target population, their distribution, in the state and the barriers they face will help identify more granular and accurate pockets of demand. All the above research and recommendations are provided at the county level. However, there may be distinct differences within counties that should be considered. Within a county there may be pockets of LEP households driving the percentage, it may be beneficial to target this location for CBO network expansion or to implement mitigation strategies (e.g., providing transportation, CBO pop-ups). Additionally, a county may be considered served by a CBO, but they provide most of their support in one portion of the county. In the case of very large counties, transportation may be a barrier to entry, and different strategies may be required in different regions of a county to best serve the population.

4.5.3 IMPLEMENTATION APPROACHES AND IMPROVEMENTS

SHE, along with their subcontractor Milestone Consulting, implement the CHANGES Program and manage the network of CBOs, the CBOs then provide the CHANGES services to clients. This section discusses the effectiveness of this approach, and if there are adjustments that should be considered to better meet the needs of CHANGES customers. We suggest the following criteria can be used to assess the implementation approach and to identify improvements. We have grouped these criteria into three main categories:

- Client satisfaction criteria
  - Overall CHANGES program experience
  - Perceived barriers to participation
  - Value and success of services received
- CBO satisfaction criteria
  - Satisfaction with Implementer staff support
- Program optimization and effectiveness criteria
  - Target population served
  - Implementer barriers to effective network management

The criteria listed above are relevant in assessing implementation and identifying improvements. Data are a vital component for assessing these criteria and identifying areas of improvement. Previously, we discussed inefficiencies with the current CHANGES database as well as potential solutions. Data are the cornerstone of every invoice approved, every report run, and every data-driven programmatic decision, so upgrades to the database and tracking systems have the potential to better inform implementation improvements. The criteria will continue to evolve as the available data and CHANGES network evolve over time.

Using available data, our findings regarding the current implementation approach are mixed. From a client and CBO staff perspective, the CHANGES Program is effective in meeting client needs. However, data on the distribution of CBOs and program activity indicates the current model may have some weaknesses in ensuring adequate coverage in all areas of need.

- Client Satisfaction: While regional variation exists in client needs, it appears that, in general, the network of CBOs works well in terms of meeting those needs. Clients are satisfied with the services they receive from the CBOs. Current implementation allows customers to get in-person help, avoiding the largest barrier, which was difficulty reaching a human representative and long wait times.
- CBO Satisfaction: CBOs are satisfied with the support they receive from implementer staff, especially Milestone Consulting.
- Program Optimization and Effectiveness: Implementers are effectively managing the CBO network. SHE is located in the North and Milestone Consulting in the South, and working together they are able to effectively manage the CBO network across the state. Regarding the coverage of the CHANGES program relative to the target population, the current model may have gaps in adequate coverage, such as the counties identified in section 4.5.2 .

CLIENT SATISFACTION

Clients from different regions may face different barriers to receiving assistance through the CHANGES Program or may need different types of assistance. Implementation approaches that account for the heterogeneity of regions may help reduce the barriers that these clients face.

Survey results indicated that public transportation and walking were the most common methods that CHANGES clients used to get to their CBOs to receive case assistance. Not all regions have adequate public transportation and traveling from rural areas may require increased travel time. By identifying regions with poor public transportation and walkability, and implementing additional support, CBOs could reduce potential client barriers in those regions. This additional support could be providing transportation assistance or increasing virtual support opportunities for those CHANGES clients that might be more tech-savvy.

The service needs of the target population may also differ by region. The evaluation team also explored regional differences in case assistance resolutions to identify the regional specific needs of CHANGES clients. Clients who received case assistance and had valid zip codes were mapped based on the case resolution they received. In general, we found that most resolutions could be found across the state of California, with a few exceptions (often specific to an IOU):

- Electricity Aggregation was concentrated in the Bay Area
- Energy Assistance Fund was clustered in Los Angeles
  - This resolution is only available to SCE customers
- Gas Assistance Fund was clustered in Los Angeles
  - This resolution is only available to SCG customers
- Neighbor to Neighbor was concentrated in San Diego
  - This resolution is only available to SDG&E customers

Ensuring that the CBOs that service these areas are equipped to provide these resolutions is integral to meeting the regional-specific needs of CHANGES clients.

CBO Satisfaction

The CBO staff interviewed generally viewed SHE and Milestone Consulting in a positive light. They reported that SHE and Milestone Consulting staff were supportive and responsive to their questions and/or concerns. Additionally, they reported having frequent contact with Milestone Consulting staff. CBO staff interviewed did not note any difficulties with the physical location of SHE and/or Milestone Consulting, although this has been a concern voiced by IOU program staff. Regular check-ins with CBOs can help to gauge CBO needs and challenges and help maintain CBO satisfaction.

Program Optimization and Effectiveness

SHE and Milestone Consulting manage the CBO network, with SHE having a physical presence in the North and Milestone Consulting in the South. The data do not indicate that the physical location of SHE, lead implementor, in PG&E territory has resulted in an increase of services being provided in Northern California. Instead, this seems to be a result of the increased capacity of the CBOs in PG&E territory. The tables found in 4.6.2 illustrate the most active CBOs by way of average spending and number of activities, which can be viewed as a proxy for capacity. The five most active CBOs in each table all serve PG&E territory. From the data, it is unclear whether the increased capacity is in turn, a result of SHE's physical location in PG&E territory and/or the historical connection to the TEAM program and shared CBO network.

Overall, much of California has CHANGES CBO coverage, with a few identified gaps. Identifying strategies to fill those gaps, such as leveraging municipal utilities and small multi-jurisdictional utilities (SMJUs), engaging more CBOs in the CHANGES program, and working to increase the capacity of current CBOs, may help optimize the network and the number of clients served. However, while the implementation of the program appears to be working at this size, if the program were to expand, a few improvements would be necessary. Based on these criteria above, additional implementer staff within Milestone Consulting or SHE would need to be added. If the program tried to expand without adding additional implementer staff, it is likely CBO satisfaction would decline. If CBOs did not feel supported by the implementation staff, it might also have undue impacts to the services they provide to CHANGES clients.

4.6 PROGRAM COSTS AND FUNDING

In this section, we document how budget and program costs are allocated, the extent to which the budget is appropriate, and the appropriateness of the funding source in relation to addressing the primary customer needs supported by CHANGES.

4.6.1 PROGRAM COSTS

The annual CHANGES Program budget is just over $1.75 million. Of that amount, 4% is earmarked for two independent third-party evaluations which reduces the operational spending budget by about $70k per year.[25] The average annual spending from 2019 through 2021 was $1.6 million. Table 27 shows the total amount spent across three years of the program, with a total of just above $4.7 million spent over the evaluation period. The spending is broken down into three main categories:

- Prime Contractor Costs (SHE)
  - Program Administration – encompasses spend on subcontractor training, material development and other administrative support costs.
  - Trend Analysis - includes SHE's costs for conducting and reporting trend analyses.
- Subcontractor Costs
  - CBOs
    - Direct Provision of Services – includes funds that were spent directly on the CBO's educational, outreach, and needs and dispute resolution activities, as well as mandatory CBO training and translation.
  - Milestone Consulting
    - Program Administration - includes money spent on administrative support provided to the CBOs, materials development, planning, and coordination.
    - Trend Analysis – includes Milestone Consulting's costs for conducting and reporting Trend Analyses.
  - Other Subcontractors
    - Non-CBO contractors (Streamline Social, VIRTEK Company, etc.)– includes database maintenance and sign Language Interpretation
- Other Costs – includes money spent on database management and special activities incurred through the trend analysis.

[25] See D.21-06-015. The percent set aside for a third-party evaluation remains unchanged (4%) from the previous decision (D.15-12-047) but as the overall budget increased from the last decision, so too did the total evaluation amount.

Table 32. CHANGES Program Spending by Category by Year (2019-2021)

	2019		2020		2021		Evaluation Period	
Contractor Costs (SHE)								
Administrative	$247,474	15%	$295,773	20%	$254,025	16%	$797,273	17%
Trend Analysis	$25,599	2%	$29,250	2%	$29,250	2%	$84,099	2%
Subcontractor Costs								
CBOs: Direct Provision of Services	$946,468	59%	$750,710	50%	$898,209	56%	$2,595,387	55%
Milestone Consulting: Administrative	$255,650	16%	$278,825	19%	$287,438	18%	$821,913	17%
Milestone Consulting: Trend Analysis	$72,325	4%	$86,175	6%	$89,100	6%	$247,600	5%
Other Subcontractors	$ 60,016	4%	$59,425	4%	$59,209	4%	$178,649	4%
Other Costs								
Other	$5,500	<1%	$0	0%	$1,125	<1%	$6,625	<1%
Total	**$1,613,032**	**100%**	**$1,500,158**	**100%**	**$1,618,355**	**100%**	**$4,731,545**	**100%**

Note. Funding was increased to $1,752,502 for PY 2021.

About 50% of program spending is dedicated to direct provision of services, with the remaining 50% divided relatively evenly between Milestone Consulting's services and SHE Contractor costs. This finding is relatively consistent across years. The spending on program implementation fluctuates within months, with some months below the monthly budget and some months above. However, annual spending over the past three years (2019, 2020 or 2021) has never met or exceeded the annual operational budget.[26, 27]

Case assistance overall accounts for the largest share of annual spending (approximately 50% for the whole evaluation period)[28]. Furthermore, the amount spent on case assistance services generally, and needs assistance specifically, has increased year over year. Dispute resolution decreased year over year, likely due to the COVID moratorium on disconnections. Education has the second largest share, constituting about a third of spending overall. While the spending on education has decreased over time, spending on outreach has remained relatively consistent in the last three years (Table 33).

Table 33. CHANGES Spending on Direct Provision of Services by Activity Type by Year (2019-2021)

	2019		2020		2021		Evaluation Period	
Needs Assistance	*$199,725*	*21%*	*$278,400*	*37%*	*$395,550*	*44%*	*$873,675*	*34%*
Dispute Resolution	*$181,200*	*19%*	*$131,100*	*18%*	*$91,050*	*10%*	*$403,350*	*16%*
Case Assistance Subtotal	$380,925	40%	$409,500	55%	$486,600	54%	$1,277,025	49%
Education	$394,043	42%	$199,710	27%	$246,109	27%	$839,862	32%
Outreach	$146,500	15%	$139,500	19%	$139,500	16%	$425,500	16%
Other services* (training and translation)	$25,000	3%	$2,000	<1%	$26,000	3%	$53,000	2%
Total	$946,468	100%	$748,710	100%	$898,209	100%	$2,595,387	100%**

*Additional spending on direct provision of services, categorized as "other services" in 2019 and 2021 includes mandatory training.

[26] This table presents annual spending by calendar year, whereas the annual budget is by program year.

[27] SHE program staff report, and the CPUC confirms, that spending for the current program year (2022) will meet the annual budget and suggest that the underspending is the result of services affected by COVID during our evaluation period.

[28] Case assistance services include needs assistance and dispute resolution activities.

** Does not sum to 100% due to rounding

Within CHANGES, each service type has a dollar amount per unit associated with it for invoicing. Table 34 outlines how much CBOs are reimbursed for each service type.

Table 34. Reimbursement per Service Type

Service Type	Reimbursement per unit
Case Assistance	
Dispute Resolution	*$150*
Needs Assistance	*$75*
Education	**$10**
Outreach	
Bill Fairs	$1000
Media Placement	$1000
Special Outreach Project	$1000
Comm. Event/Presentation	$500
Social Media	$500

Looking at the invoicing data, the program tracking data, and considering the total spending amount for the evaluation period, we calculated the average costs incurred by the CBOs per unique client, unique case assistance event (unique cases that were resolved), and resolution (Table 35). There was an average cost of $118 per unique CHANGES customer who received 1:1 case assistance; $88 per case assistance event, and $71 per resolution. **This suggests that the CPUC should revisit the basis for the per unit cost established for case assistance reimbursement to assess whether updates need to be made.** Possible updates could include allowing CBOs to be paid for multiple resolutions per case, and/or adjusting reimbursement amounts. Currently, CBOs are only able to receive reimbursement for one resolution.

Table 35. Costs per Client, Case Event, and Resolution

Number	Unit	Cost per Unit*
10,831	Case Assistance Client	$118
14,558	Case Event	$88
18,033	Resolution	$71

*Costs calculated from the $1,277,025 spent on case assistance services. Case Assistance Client: $1,277,025/10,831 = $118, Case Event: $1,277,025/14, 558 = $88, Resolution: $1,277,025/18,033 = $71.

4.6.2 CBO COSTS AND FUNDING

Each CBO has varying levels of activity, and thus annual costs across CBOs vary. As such, the program allows for flexibility in each CBO's budget to account for this variation in activity. Table 36 details the yearly costs incurred by the CBOs, as reported through invoices, along with a calculation of the average monthly cost invoiced by each CBO. This table is sorted in descending order from the highest average monthly cost. Higher average monthly costs suggest the CBO is more active, whereas lower monthly costs suggest low levels of activity.

Table 36. CBO Costs by Year and Average Monthly Cost

CBO	2019	2020	2021	Average Monthly Cost
CBO 1*	$58,266	$64,138	$114,472	$6,580
CBO 2*	$62,975	$67,310	$86,462	$6,021
CBO 3*	$69,319	$54,274	$66,400	$5,278
CBO 4*	$50,431	$48,300	$73,910	$4,796
CBO 5*	$43,341	$37,862	$50,105	$3,647
CBO 6	$42,606	$45,669	$23,725	$3,111
CBO 7*	$29,905	$42,928	$35,675	$3,014
CBO 8	$50,189	$30,834	$24,075	$2,919
CBO 9	$35,264	$36,451	$32,305	$2,889
CBO 10	$55,043	$29,851	$16,000	$2,803
CBO 11	$38,984	$28,120	$30,510	$2,712
CBO 12*	$35,067	$21,123	$38,715	$2,636
CBO 13	$32,441	$34,153	$25,660	$2,563
CBO 14	$50,366	$16,538	$22,605	$2,486
CBO 15*	$37,246	$17,365	$34,190	$2,467
CBO 16*	$35,520	$17,525	$35,725	$2,466
CBO 17	$28,748	$31,695	$26,850	$2,425
CBO 18	$23,484	$23,690	$27,750	$2,081
CBO 19	$22,320	$15,919	$30,080	$1,898
CBO 20	$12,423	$24,567	$26,364	$1,760
CBO 21	$34,544	$12,369	$7,915	$1,523
CBO 22	$21,079	$15,194	$11,815	$1,336
CBO 23	$15,078	$8,701	$21,230	$1,250
CBO 24	$13,395	$8,015	$16,875	$1,063
CBO 25	$16,344	$2,269	$8,320	$748
CBO 26	$16,401	-	-	$456
CBO 27	$7,935	$2,800	$380	$309

*CBOs which spent over the annual budget ($33,625) in 2021.

There is an annual budget amount allocated to each CBO in the CHANGES network, but there is no penalty for not meeting or exceeding that budget amount. In 2021, each of the 27 CBOs had an annual budget of $33,625, with nine CBOs going over their budget amount, while the rest came in under budget (Table 36). SHE and the CPUC want the CBOs to have flexibility in their spending each month given that it is difficult to predict how busy one CBO may be. As a result, CBOs are allowed to exceed their budget to avoid turning eligible clients away. SHE reallocates the budget midway through the year to account for these overages or savings. During the evaluation period, the program has stayed under its total annual budget cap of $1.75 million.

While Table 36 is useful to understand costs for direct provision of services, it does not illustrate costs for the larger network structure in which CBOs operate. To better approximate the cost per CBO operating in the network, we calculated the average annual program cost per CBO. We use the total program spending for the evaluation period (Table 32), which includes administrative and technical support—instead of the total cost for the direct provision of services—for our calculation. This is because the direct provision of services amount does not account for costs that are integral to operating the CBO network.

The average cost for a CBO to provide CHANGES services and to be managed within the CBO network is $58,414 per year (Table 37). There are CBOs that provide more services than the average, as well as less services, and in doing so, their costs may be more or less, respectively. However, an approximation of the average cost may still be useful. Any new CBO joining the network could reasonably expect to incur additional costs, not included here, for initial set up and training for service provision.

Table 37. Average Annual Cost per CBO

Total Program Spend (2019 – 2021)	Number of CBOs in Network	Average cost per CBO per Evaluation Year
$4,731,545	27	$58,414

While it is useful to understand the average cost per CBO, as well as the average costs per client and service provided, understanding how the role CHANGES funding plays in their overall budget is also useful for context.

Funding from the CHANGES Program is a small fraction of the CBOs' overall budget. Of the eight interviewed CBO representatives who could recall what percentage of their organizational funding comes from CHANGES, none reported a percentage greater than 10. Table 38 shows the number of CBOs interviewed and their recollection of the percentage that CHANGES funding represents within their overall budget.

Table 38. Percentage of Funding Coming from CHANGES Program of CBO's Overall Budget

Funding from CHANGES Program	Number of CBOs Interviewed
10% or less	4
5% or less	4
Unsure	2

CBOs reported that one-on-one case assistance services were the costliest service. Within needs assistance and dispute resolution, CBOs incurred greater costs rendering:

- *General dispute resolutions.* Three CBO representatives noted increases in costs were regularly incurred when providing dispute resolution, due in part to long wait times on IOU customer service lines. As CBOs are reimbursed per unit, they do not get reimbursed additional money if the resolution takes more time than is typical.

> ***"It's me running against time at four o'clock, sometimes staying later just to make sure that nobody's going to cut your services off tonight. The time that we spent on disputes was more than what we were actually getting compensated for, even on the needs itself." – CBO Interviewee***

Survey participants indicated that, most of the time (88%), a CBO representative spent 1 to 2 hours with them to resolve their issues. Eight percent of surveyed CHANGES clients indicated that it took the CBO representative multiple days to resolve the issue, While five percent of survey participants reported the CBO representative spending between 3 and 8 hours with them.

- *Clients with multiple resolutions per case.* Two CBO representatives discussed the costs they incurred when helping clients with complex situations, usually involving more than one need or resolution. For example, a CBO can help a client who needs assistance with understanding their bill and getting enrolled in the CARE program, but the same client may also need assistance with disputing a high bill or potential service disconnection. Representatives said that while a client may come in with more than one CHANGES-related need, the CBO can only input and get reimbursed for one type of resolution.
- *Clients from outside of IOU service territory.* Three representatives mentioned the costs associated with helping clients outside of IOU service territory, such as those residing in small multijurisdictional utility (SMJU) or municipal utility territories. It is not uncommon for CBOs to have clients who live outside of IOU territory but still walk-in or schedule appointments; often, CBOs will not turn clients away who request energy assistance. Since non-IOU service territories are not partners with the CHANGES Program, CBOs cannot be reimbursed for services offered to this subsect of clients.

> ***"We usually help those clients. Whoever comes in, we just help them, but we just don't get paid." – CBO Interviewee***

- *Invoices.* Additionally, mailing paper invoices is a small cost incurred by the CBOs that could be avoided. CBOs are required to send their invoices both electronically and by physical mail. CBOs are not reimbursed for the stamps they use monthly. Some CBOs even use certified mail which has an additional cost and requires staff travel to and from the post office. Sending both an electronic and paper version of an invoice results in unnecessary paperwork, mailing costs, staff administrative time, and resource use.

In sum, **CBOs incur costs during the CHANGES Program implementation for which they are not reimbursed, namely: time-intensive bill disputes; addressing multiple needs per client but only able to invoice for one service/resolution; helping clients outside IOU territories; and paper mailing invoices.** Lastly, CBOs incur additional program-related expenses, such as administrative and IT costs. Although these are not CHANGES specific costs, the CBOs would not be able to provide services for the CHANGES Program without them.

4.6.3 IOU FUNDING AND COSTS

Each IOU has a set proportion of the CHANGES Program that it is required to fund (see Table 39). **This proportion does not change depending upon the number of services provided in its territory.** Funding amounts were established in Decision 15-12-047[29], and follow the same structure outlined in the CARE Decision 02-09-021[30], which is the traditional structure used for IOU funding.

Table 39. Allocation of CHANGES Program Funding by IOU

IOU	CHANGES Budget Provided
PG&E	30%
SCE	30%
SCG	25%

[29] All CPUC Decisions related to this program can be found at https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs.

[30] https://docs.cpuc.ca.gov/PublishedDocs/WORD_PDF/FINAL_DECISION/18945.PDF

IOU	CHANGES Budget Provided
SDG&E	15%
Total	**100%**

In section 4.3.2, we presented the breakdown of case assistance events and community outreach events by IOU. Program data for education and media outreach are not tied to IOU territory, so it was not included in the table. In Table 40 below, we present the same information tied to the IOU funding breakdown. The light blue color indicates where an IOU may be underpaying based on the share of services provided in their territory, light purple represents that an IOU may be overpaying, and grey means that there are not enough data to determine how the share of funding the IOU is responsible for relates to the program services provided in its territory.

Table 40. Comparison of Allocation of CHANGES Funding and Distribution of Program Activity by IOU

IOU	CHANGES Funding Paid	Case Assistance Services	Community Outreach Events
PG&E	30%	64%	41%
SCE	30%	15%	51%
SCG	25%	15%	
SDG&E	15%	6%	8%

The proportion of program funding each IOU pays does not correspond to the percent of services provided in their territory. PG&E pays 30% of the CHANGES Program costs, yet 64% of one-on-one case assistance services and 41% of community outreach events are provided in their service territory. SCE is required to pay the same amount and has roughly the same amount of need (in terms of % LEP households) as PG&E but only 15% of case assistance services are provided in SCE territory. SCE and the other IOUs appear to spend proportionately more on the CHANGES Program than the proportion of services rendered in their territory.

Having additional IOU data on education and media outreach would be useful, so that the full scope of direct provision of service costs can be accounted for. Appendix D shows a detailed breakdown of each individual utility costs per activity type across the three years under study.

4.6.4 PROGRAM FUNDING SOURCE

The CHANGES Program is currently funded through the CARE budget, as per Decision 15-12-047[31] which established CHANGES as an ongoing program in 2015. Decision 21-06-015[32] approved the continuation of funding from the CARE budget for 2021- 2026. As part of Decision 21-06-015[33], testimony from the IOUs explored the question of whether alternate funding sources should be used for the CHANGES Program. Some of the IOUs argued that the CHANGES Program provides minimal benefit to CARE customers and highlighted that the majority of CHANGES services in their territories were for non-CARE related assistance, such as bill payment assistance, payment plans, and account changes/set-up/reconnection. The CPUC ultimately decided that while the program may provide benefits not directly related to the CARE program, it does, provide benefits to the overall low-income community. It further directed future evaluations to investigate program funding based upon the beneficiaries of the program.

[31] https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs
[32] Ibid.
[33] Ibid.

We assessed the appropriateness of the current program funding source from two perspectives:

- A services-centric perspective, which isolated the percentage of all CARE-related services provided by CHANGES
- A customer-centric perspective, which focused on the beneficiaries of CHANGES services

From the services-centric perspective, a small percentage (4%) of case assistance services were CARE-related. Table 41 outlines the number of CARE-related cases offered by the CHANGES Program per year, along with the total number of cases across all three years. For the evaluation period, a total of 679 CARE-related services were provided, representing 4% of all one-on-one case assistance services rendered by CHANGES.

Table 41. CARE-related CHANGES Case Assistance (2019 – 2021)

	2019 Cases	2020 Cases	2021 Cases	Total Cases
All CARE Categories	152	196	331	679
▪ *CARE/FERA*	63	165	318	546
▪ *Assist w/ CARE recertification/audit*	69	16	0	85
▪ *Assisted with CARE certification/audit*	16	11	1	28
▪ *CARE High Energy User Document Submission*	4	2	9	15
▪ *CARE Discount not Credited to Account*	0	2	1	3
▪ *CARE Enrollment Problem*	0	0	2	2
Percent of Case Assistance Services (N = 18,033)				*4%*

From a customer-centric perspective, almost all (96%) CHANGES participants are eligible for CARE and 88% of eligible CARE participants are reported to be enrolled. Table 42 outlines the percent of CHANGES participants who are qualified for CARE, along with their CARE enrollment status. These numbers indicate that a large majority of CHANGES participants are income constrained. Among those CHANGES participants who are CARE eligible, most are also already enrolled (88%). This is consistent with the participant survey results, where 93% of survey participants were at or below 200% of the federal poverty level, and therefore, CARE eligible.

Table 42. CARE Eligibility and Enrollment among CHANGES Participants

	Not Enrolled in CARE	Enrolled in CARE	Total	CHANGES participants
Not CARE Qualified	427	-	427	4%
CARE Qualified	1,223	9,165	10,388	96%
Total CHANGES Participants	1,650	9,165	10,815	100%

Through comparing funding from the general rate case (GRC) and CARE, the evaluation team believes that the current funding source is appropriate given the program's service provision to CARE enrolled and eligible customers, even if services are not directly related to CARE. Furthermore, if the CHANGES program were to be funded through the GRC, then those in need of CHANGES services, would be paying for the program via their rates. Often, income-qualified customers do not pay into programs that help income-qualified customers. The current funding set up through CARE ensures that CHANGES clients are not paying more each month to fund CHANGES, since income-qualified customers are exempt from paying into the CARE budget.

4.6.5 PROGRAM EXPANSION, MODIFICATION, AND REDUCTION

While there is no definitive evidence within this evaluation period to suggest that expanding the funding of the CHANGES program is warranted, COVID-related budget impacts and demand fluctuations suggest that a longer time horizon to assess funding expansion, modification, and/or reduction is needed.

As presented throughout the report, the evaluation team used the following criteria to investigate current program funding, given program goals and customers' needs:

- Cost per resolution compared to reimbursement per resolution
- CBO performance against individual annual budget allocations
- Overall program spending compared to annual budget
- Gaps in CBO coverage based on geographical and demographic data
- Under/over payment by the IOUs based on existing funding split
- CBO and IOU feedback on current funding levels
- CBO perceptions of the value of program activities

As described in previous sections, there is a disparity between the services CBOs offer to a single customer, and what they are allowed to submit for reimbursement. This creates a fundamental problem for all CBOs, but especially for those with higher activity levels, since they are not properly reimbursed for the totality of services they are providing. While the CHANGES Program offers flexibility in terms of CBO spending (below or above their annual budget), this amount spent still only accounts for the services that the CBOs are able to invoice. Other "secondary" services they provide, as well as additional costs they incur to implement the program, go unregistered and are not covered financially.

CBOs provide services to customers outside the service territory of IOUs. The needs of these customers who are served by smaller electric and gas utilities should be considered, and CBOs usually help them and are not reimbursed for it. Data on assisting or turning away clients in these territories are not tracked, so we are unable to quantify the estimated costs of expanding the network to cover these areas. Future research is warranted with these smaller electric and gas utilities to understand current offerings they have for their LEP customers and any action they have taken to help their LEP customers. Additionally, if the program expands to cover LEP customers outside of IOU territories, the current budget would need to be re-examined to determine the utility funding split, as current funding is only shared by the four IOUs and would likely need to be shared across all participating utilities.

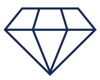
Similarly, the evaluation team identified counties in the state that are currently unserved or underserved by CBOs. Broadening the Program's CBO network to cover potential gaps in the region is warranted, but depending upon the how the CHANGES Program decides to optimize, we are unable to predict how that might impact additional funding, if at all. It does appear that there is room to potentially add one or two CBOs without going over the current funding allocation, given that the Program has historically been underspending and because a CBO left the network in 2022. However, this underspending may be attributable to changes in service provision due to COVID. SHE program staff suggest, and CPUC staff confirm, that this program year it will be different and the budget spend will be maximized. Regardless, moving forward, if the CHANGES Program decides it would like to grow the CBO network substantially and the number of customers served, this would likely warrant expanding funding for program implementation staff at Milestone Consulting and SHE, given that they would likely need additional support.

Lastly, **the evaluation team believes that the funding structure of the CHANGES Program should be reviewed.** The share of funding that each IOU is responsible for to fund the Program does not align with the share of services CBOs provide across service territories. This may be resulting in over or under payment for services provided within their territories. Additionally, during the review, the Program could explore funneling unspent program budget to cover additional case assistance services or modifying the use of outreach dollars to channel into case assistance. Data indicate that word of mouth is most important for creating program awareness and outreach activities bring the least value to the Program.

CONCLUSIONS AND RECOMMENDATIONS

Overall, our assessment indicates that the CHANGES Program is adhering to its core principles and serving the energy-related needs of LEP customers within the IOU territories. We summarize the conclusions and recommendations from the evaluation below, using icons from Table 43 to indicate with which evaluation objective the conclusion aligns.

Table 43. Evaluation Objective Icons

Overall Performance	Data Collection	Program Value	Program Costs & Funding	Program Operations & Structure
				

Research Objective: Overall Performance

- **Conclusion: The CHANGES Program is conducting activities aligned with its four stated objectives through program activities.** An analysis of program activity in three programmatic areas (case assistance, outreach, and education) indicates that the CHANGES Program is helping customers in the target population to: understand their energy bills; resolve bill disputes, service issues, and avoid disconnection; increase awareness of financial assistance and energy programs as well as support customer access to the programs; and learn about ways to save energy. Throughout the evaluation period, the CBOs in the CHANGES network reported providing services in 44 languages, served 10,831 unique clients through case assistance, held 5,431 educational events and 215 community outreach events, and conducted 113 media outreach placements.

  Research Objectives: Data Collection and Overall Performance

- **Conclusion: Current data collection and tracking practices limit the ability of program implementers and stakeholders to understand the full impact of the program on LEP customers.** Additional variables are needed to understand how key program activities are affecting those receiving services. For example, program staff currently have no way of determining whether a given client received support multiple times or whether clients are being effectively channeled from one program activity to another. Further, the current data tracking structure does not allow SHE or participating CBOs to map an initial problem to a resolution, which is limiting the ability of the program implementation team to understand how effectively the program is serving clients.
  - **Recommendation**: The evaluation team recommends the CPUC work with SHE to improve the accessibility, completeness, and quality of program tracking data. While some components of this recommendation may require additional resources (e.g., budget, staff time, expertise) more and better data are needed to provide a robust assessment of program performance for both internal and external audiences. The evaluation team recommends investment in the following:
    - Establish unique client identifiers: Assign unique ID numbers to each CBO client so that service delivery is better understood and potential issues such as lack of issue resolution are more easily identified.
    - Add data fields critical to program delivery. Efforts should be made to collect and track the following data fields:
      - Specific referral source

            - Case resolution status
        - Review naming conventions and develop data dictionaries. Review current resolution naming conventions to ensure each resolution type is mutually exclusive and is aligned with the actual resolution and not the problem. Milestone Consulting and/or SHE should also create a data dictionary so that each and every resolution has a detailed description, thus making these data more easily understood across parties.
        - Improve tracking database configuration: Given that switching to a different data tracking software is unlikely, SHE should explore the feasibility of a few fixes within the current system. These include:
            - Allowing selection of only one customer problem at a time from the drop-down list and then allowing for the list of resolutions to include primary resolution and secondary resolutions. The CBO would then also be able to select a second and third customer problem, if needed.
            - Configuring the system to allow CBO staff to pull reports that can be exported into the monthly invoicing template.
            - Using field validation to reduce manual data entry errors.
    - Recommendation: As detailed within the report, the evaluation team recommends codifying metrics related to program activities, client characteristics, program referrals, and assistance outcomes among other areas (see Section 4.2.2).

Research Objective: Program Costs and Funding

- **Conclusion: While there is no definitive evidence within this evaluation period to suggest that expanding funding for the CHANGES Program is warranted, COVID-related budget impacts and demand fluctuations suggest that a longer time horizon is needed to comprehensively assess the basis for funding expansion.** The program budget was underspent each year of the evaluation period; however, current invoices indicate this will not be the case for 2023. Findings from interviewed CBO staff and surveyed CHANGES clients suggest that case assistance services are the most valuable and beneficial to the program, and program tracking data indicate case assistance is the largest share of annual program spending. Additionally, program data indicate that spending on case assistance has been increasing year over year. The moratoriums on disconnections during COVID have been lifted, and dispute resolution cases, which saw a decrease aligned with the moratoriums, are rebounding. At the same time, CBOs incur case assistance costs associated with handling time-intensive bill disputes, addressing multiple clients' needs under one service/resolution, and helping clients in small multi-jurisdictional utilities (SMJUs), which are not fully reimbursed through the program.
    - **Recommendation**: The next evaluation should assess whether an increase in funding is warranted, using data from 2022 and 2023 and pre-COVID data (which was outside the timeframe for this evaluation). This assessment should also account for any CBOs added or removed from the network (one CBO left in 2022) and budget estimates for expanding services into SMJUs and municipal utility territories.
    - **Recommendation**: The CPUC should revisit the basis for the per unit cost established for case assistance with SHE, examining how the current cost per unit was established and what updates should be made to key assumptions. There is currently a misalignment between the reimbursement per service type for case assistance and the manner in which the service is provided. For example, one case can result in multiple resolutions. However, payment is limited to one resolution per case. On average there are 1.24 resolutions completed per case. This means that when a CBO spends more time resolving multiple issues for a client, that is not reflected in the reimbursement amount.

Research Objective: Program Costs and Funding

- **Conclusion: Program costs may not be fairly distributed across the IOUs, as indicated by the services provided in their territories.** Each IOU provides a set proportion of funding for the CHANGES Program that does not change based on the number of services provided in its territory. However, based on available data from case assistance services and community outreach events, SDG&E, SCG, and SCE may have overpaid during the evaluation period based on program activity, while PG&E may have underpaid.
  - **Recommendation**: The CPUC should work with SHE and the IOUs to understand the misalignment in service provision in IOU territory and IOU funding. This may include:
    - Re-evaluating the traditional funding split of 30% PG&E, 30% SCE, 25% SCG, and 15% SDG&E

Research Objective: Program Operations and Structure

- **Conclusion: From a participating client and CBO staff perspective, the CHANGES Program is effective in meeting customer needs. However, data on the distribution of CBOs and program activity indicates the current model may have some weaknesses in ensuring adequate coverage in all areas of need.** CBO clients report high levels of satisfaction with the services provided through the program and participating CBOs report satisfaction with the implementation team (SHE and Milestone Consulting). While members of the implementation team are located in opposite parts of the state (i.e., SHE is located in the North and Milestone Consulting in the South), interview data suggest that they are working together to manage the CBO network and provide services throughout the state. Census data combined with CBO coverage data suggest that LA county may be underserved. Furthermore, the central valley is at risk of becoming underserved if it were to experience a loss of coverage from a CBO. Additionally, there are underserved areas located within and outside of IOU territories. In terms of the latter, CBOs report providing energy-related assistance to clients in SMJUs and other municipal utilities, but are unable to seek reimbursement for these services, given the current program structure.
  - **Recommendation**: The CPUC should consider the benefits, drawbacks, and budget implications of expanding CHANGES service delivery to areas served by SMJUs and other municipal utilities to meet the needs of all LEP customers in California. While there are not currently data available from the CBOs to help assess how large the need outside of IOU territories might be, looking at the percentage of LEP households in those areas could help inform this estimation as could outreach directly to those other utilities.
  - **Recommendation**: SHE should re-evaluate CBO coverage and potentially consider adding a few more CBOs in unserved/underserved areas.

Research Objective: Program Costs and Funding

- **Conclusion: Based on the services provided and the customers who benefit, funding the CHANGES Program through the CARE budget is appropriate as compared to the general rate case (GRC).** Almost all CHANGES participants are eligible for CARE (96%) and over three-quarters of eligible CARE participants are enrolled in that program (88%). Furthermore, CARE is currently funded via a rate surcharge paid by all other utility customers, excluding CARE customers.[34] If the CHANGES program were to be funded through the GRC instead of CARE, CHANGES clients would pay for the program via their rates. The current funding set up ensures that the costs are recovered in rates to other non-low income customers, which is aligned with best practices.

Additional Research

- **Conclusion: Members of the study team have questions for future research that are outside the current scope.**
  - Recommendation: Future research could focus on CBOs' relative value. The following research questions could be asked: Which CBOs are the most impactful? What is their unique expertise, if any, that allows them to better serve CHANGES clients? Which CBOs are the least impactful and why? Should any CBO be

[34] https://www.cpuc.ca.gov/industries-and-topics/electrical-energy/electric-costs/care-fera-program

removed from the network? What are the relative costs and benefits for the various services provided by different CBOs?

- Recommendation: Conduct research to inform improvements to IOU service delivery to LEP customers. This could include assessing how the IOUs might improve their marketing and outreach efforts to educate LEP customers about how to apply for or get information about assistance programs.

APPENDIX A. RESEARCH QUESTIONS

The key research questions we sought to answer as part of this evaluation are as follows:

Table 44. Research Questions with Cross-References

Detailed Research Questions	Primary Study Objective	Section
Task 1: Evaluability Assessment		
Develop Program Theory Logic Model and Metrics		
What are the primary goals of CHANGES?	Overall Performance	4.3.1
What metrics are appropriate and viable to assess CHANGES overall success?	Overall Performance	4.2.1
How should performance on key CHANGES activities be measured? E.g., in (1) outreach activities, (2) educational activities, (3) needs assistance activities, (4) dispute resolution activities.	Overall Performance	4.2.1
Based on examination of other existing activities, services, and programs within the IOUs, to what extent is the program duplicative and/or what key gaps does CHANGES fill?	Program Value	4.4
Assess Status of Data Collection		
What data are currently collected, tracked, and reported? What is the accuracy, cost to collect, and usefulness of each data element?	Data Collection	4.2.1, 4.2.4
What additional data are needed to support measurement based on existing program goals and metrics? Should additional performance metrics be used to reflect CHANGES performance in each functional area? If new metrics are identified, what data should be collected to support collection and assessment of those metrics, including by CBOs?	Data Collection	4.2.1
What are the barriers to collecting and tracking those data?	Data Collection	4.2.1
For future reporting purposes, what metrics use tracking data (potentially reported regularly) and what metrics require an evaluation (additional data collection, less frequent)?	Data Collection	4.2.1
Task 2: Assessment of Program Costs and Benefits		
What are the costs associated with the program and how are costs allocated to (1) outreach activities, (2) educational activities, (3) needs assistance activities, and (4) dispute resolution activities?	Program Costs and Funding	4.6.1, 4.6.2
How is the budget allocated (what is the funding allocation) across IOUs or regions of the State?	Program Costs and Funding	4.6.3
To what extent is the current allocation appropriate given the goals of the program and needs of the customers? Based on the evidence available, including an analysis of the needs met, should funding for the program be expanded, modified, or eliminated?	Program Costs and Funding	4.6.5
What measurement criteria should be used to determine if the funding is appropriate?	Program Costs and Funding	4.6.5
What evidence exists to support expanding the program? Is this evidence sufficient? If additional funding is recommended, which areas of the program should be expanded? What areas may be consolidated or eliminated?	Program Costs and Funding	4.6.5
Based on the services provided and the customers who benefit, what are the most appropriate funding sources for the CHANGES Program (i.e., supported via CARE budget and/or other CPUC or state/local/other funding sources)?	Program Costs and Funding	4.6.4
To what extent is the program meeting its stated objectives in helping customers in the target population understand their energy bills; resolving bill disputes, service issues, and avoiding disconnection; increasing customer awareness of assistance and energy programs as well as supporting customer access to the programs; and teaching customers about ways to save energy?	Overall Performance	4.3.1
In what ways could the program better serve its target population?	Overall Performance	4.5.3

Detailed Research Questions	Primary Study Objective	Section
How did COVID-19 pandemic have an impact on how effective the program was in serving its target population?	Overall Performance	4.3.2
What are the limitations (and potential improvements) of the current (1) outreach activities, (2) educational activities, (3) needs assistance activities, and (4) dispute resolution activities?	Overall Performance	4.3.2, 4.2.4
What are the key benefits of the four primary program activities? How could the program activities be improved?	Overall Performance	4.3.3
Task 3: Spatiotemporal Distribution Analysis		
What is the geographic distribution of CBOs throughout the state?	Program Operations and Structure	4.5.1
What is the optimal distribution of CBOs to serve the needs of the IOU LEP populations (define optimal)? Is the current distribution optimized to serve the needs of the IOU LEP populations?	Program Operations and Structure	4.5.2
If not optimal, what changes or improvements could be made to CBO coverage to optimize the program and ensure consumer needs are identified and supported as intended?	Program Operations and Structure	4.5.2
Are there other/better implementation approaches to meet the needs of CHANGES customers, based on differences between regions and the needs of target populations in those regions?	Program Operations and Structure	4.5.3
What criteria are used in making this determination and should the same criteria be used in making this determination as the network changes over time?	Program Operations and Structure	4.5.3

Appendix B. Additional Methodology

Participant Survey

The first two questions in the survey served as screener questions to ensure that we were surveying our population of interest, that is, CHANGES clients who had received energy-related services in 2021. In total, we received 303 survey responses. Of them, 82 (27%) screened out because they reported not having received any energy-related services by the CBO in that period. As we were unable to address the survey to a specific CHANGES client due to data restrictions, none of the surveys were able to be forwarded. Therefore, we expected that a portion of our surveys would arrive at a residence no longer inhabited by the intended recipient. It is also possible that the survey did reach the intended recipient, but they did not recall receiving energy-related services. Per best practices, respondents who screened out are not included in our response rate calculations.

Program Theory Logic Model (PTLM) Linkage Explanation and Potential Metrics

Table 45 explains the links between the CHANGES program activities, outputs, and outcomes in more detail than can be represented in the logic model. The table is organized by the link numbers.

Table 45. Explanation of Linkages in CHANGES Logic Model

Link	Segment Theory	Potential Key Performance Indicators for Future Consideration
1	The output of the activity ***Educate clientele (A)*** is ***Educational workshops held (E).*** The CBOs offer consumer education workshops to improve their clientele's understanding of energy topics, energy programs, and their energy bills (both gas and electric). The topics include: Understanding Your Bill; CARE/FERA and Other Assistance Programs; Avoiding Disconnection; Electric and Natural Gas Safety; Energy Conservation; High Energy Use & CARE; Gas Aggregation; and Level Pay Plan.	▪ # of workshops held ▪ # of attendees at workshops ▪ # of topics on which workshops offered ▪ # of languages workshops offered in
2	The output of the activity ***Conduct outreach to drive awareness of CBO services (B)*** is ***Outreach events held or attended (F).*** The CBOs conduct outreach to make potential clients aware of their existence and their services. This happens through media placements (such as radio, television, or print advertisements); outreach at community events (such as holiday events, ethnic festivals, or county fairs); social media postings; or community presentations. CBOs have a physical presence at the events and may distribute information materials or offer small incentives such as bags or pens to entice visitors to interact with staff.	▪ # of events attended ▪ # of people interacted with at each event ▪ # of people interacted with annually ▪ # of languages events were conducted in ▪ # of informational materials distributed
3	The output of the activity ***Offer needs assistance (C)*** is ***Needs assistance services provided (G).*** The CBO staff meet individually with a client who has a need. Sometimes this occurs over the phone, but often occurs in person. In-person assistance allows the CBO staff to look at the client's utility bill or obtain required signatures on enrollment forms. Many of the CHANGES clients served do not have the skills necessary to scan their bills for electronic delivery or complete electronic signatures. Examples of needs include changing the account holder's name; restoring paper billing; changing the language the bill is received in; enrolling in an eligible assistance program, such as LIHEAP, CARE, or Medical Baseline; help setting up auto payments; or needing a payment extension.	▪ # of clients whose energy need is resolved by a CBO ▪ # of needs resolved annually ▪ # of days to resolve the need on average ▪ # of distinct types of needs resolved ▪ # of CBOs providing needs assistance ▪ # of languages assistance was provided in
4	Another output of the activity ***Offer needs assistance (C)*** is ***Dispute resolution services provided (H).*** Clients may approach the CBO for needs assistance, and in the course of engaging with CBO staff, the staff identify that the client actually has a dispute instead. Or, the CBO, which takes a holistic approach to the client and their situation, may discover the client has a dispute in	▪ # of clients who approach CBO with a need, and instead have a dispute resolved ▪ # of clients who approach CBO with a need and also have a dispute resolved

Link	Segment Theory	Potential Key Performance Indicators for Future Consideration
	addition to the need. The client can therefore also receive dispute resolution services.	
5	An output of the activity ***Offer dispute resolution (D)*** is ***Needs assistance services provided (G).*** With the CBOs taking a holistic approach to the clients' needs, they may identify assistance needs for a client who approaches them with an energy-related dispute. For example, if the client has been unable to resolve an issue with their utility bill and approaches the CBO for help, the CBO may also assist the client with something else, such as enrollment in a financial assistance program.	▪ # of clients who approach a CBO with a dispute and also receive needs assistance
6	Another output of the activity ***Offer dispute resolution (D)*** is ***Dispute resolution services provided (H).*** The CBO staff meet individually with a client who has a dispute. Sometimes this occurs over the phone, but often occurs in person. Examples of disputes include an incorrect bill charge; incorrect rate plan; or a pending disconnection.	▪ # of clients whose energy disputes are resolved by CBO ▪ # of disputes resolved ▪ # of days to resolve the disputes ▪ # of different types of disputes resolved ▪ # of CBOs providing dispute resolution ▪ # of languages assistance was provided in
7	An intended short-term outcome of ***Educational workshops held (E)*** is that clients have an ***Improved understanding of their energy bills and energy topics (I).*** The education provided in the workshops should be understandable by the clientele so they can assimilate the information learned. For example, after attending the "Understanding Your Bill" workshop, the client should be able to monitor and interpret their energy bills on their own, as well as identify errors. Similarly, after attending the "Energy Conservation" workshop, clients should understand ways to lower their energy use to avoid high bills in the future, such as thermostat settings and avoiding large appliance use.	▪ Measures of knowledge of energy concepts that align with educational materials ▪ Measures of knowledge of billing terms, sections of bill, and what to look for on bill ▪ Measures of knowledge of assistance programs or energy efficiency programs ▪ Reduced #s of safety issues ▪ Reduced #s of disconnections
8	An intended short-term outcome of ***Educational workshops held (E)*** is that clientele have ***Greater awareness of the CBO's ability to help (J).*** By attending an educational workshop, the clientele will become aware of the CBO as a resource for support. The support may involve direct assistance or referral to that CBO's network of partners.	▪ Measures of awareness of CBO energy services ▪ Measures of awareness by language ▪ # of CBO referrals to friends and family
9	An intended short-term outcome of ***Outreach events held or attended (F)*** is ***Greater awareness of the CBO's ability to help (J).*** By seeing the CBO or engaging with the CBO staff at an outreach event, the clientele will become aware of the CBO as a resource for support. The support may involve direct assistance or referral to that CBO's network of partners.	▪ Measures of awareness of CBO energy services among those who attended outreach event ▪ Measures of awareness by language ▪ # of CBO referrals to friends and family
10	An intended short-term outcome of ***Needs assistance services provided (G)*** is ***Greater use of eligible programs (L).*** When the CBO staff meet individually with a client, the client will be connected with other programs or rate plans for which they are eligible. These programs should help them with their energy and financial situations. Examples of other eligible programs include: Arrearage Management Program (AMP), Energy Savings Assistance Program (ESA), Family Electric Rate Assistance Program (FERA), California Alternate Rates for Energy (CARE), Level Pay Plans, Low Income Home Energy Assistance Program (LIHEAP), and the Medical Baseline Program.	▪ # of clients referred to other programs ▪ # of programs receiving referrals from CHANGES CBOs ▪ # of referrals made to other programs
11	An intended short-term outcome of ***Dispute resolution services provided (H)*** is ***Increased adjustment of bills and client ability to pay (M).*** When the CBO staff resolve disputes, they ensure the client is billed the correct amount, which often involves removing an incorrect charge. The CBO staff may also set up payment plans for the client's outstanding charges.	▪ # of disputes resolved ▪ # of clients with adjusted bills ▪ # of clients enrolled in payment plans ▪ # of clients who pay off arrearages ▪ # of clients who avoid a disconnect notice ▪ Cost per dispute resolved
12	A short-term outcome of the ***Greater awareness of the CBO's ability to help (J),*** is ***Increased use of CBO's CHANGES services (K).*** As clientele become aware of the CBO and the services it offers, there should be increased use of the CBO's services.	▪ # of clients approaching CBO for energy-related needs ▪ # of clients served annually ▪ # of services provided

Link	Segment Theory	Potential Key Performance Indicators for Future Consideration
13	A short-term outcome of the ***Increased use of CBO's CHANGES services (K)*** is ***Greater use of eligible programs (L).*** When clients come to the CBO to access services, the CBO staff approach the client's situation holistically. This means attempting to learn about all of the client's needs and connecting them with services and programs to help. So, as clients use the CBO's CHANGES services more, the staff are more likely to connect the client with programs for which they are eligible.	▪ # of clients referred to other programs in addition to main issue they approached CBO about ▪ # of programs receiving referrals from CHANGES CBOs ▪ # of referrals made to other programs
14	A short-term outcome of ***Greater use of eligible programs (L)*** is the ***Increased adjustment of bills and client ability to pay (M).*** Many of the programs to which CBO clientele are referred are intended to increase the client's ability to pay their energy bills. Alternative rate plans are one way to lower bills. Payment plans can help clients pay off charges over time. And, programs such as LIHEAP offer one-time payment assistance to cover a high bill. By accessing these programs through the CHANGES CBO network, clients should be better able to pay what they owe to the utility.	▪ # of clients who receive one-time payment assistance ▪ # of clients on alternative rate plans (CARE/FERA, medical baseline) ▪ # of clients with payment plans ▪ # of clients that successfully complete payment plan ▪ # of clients on AMP ▪ # of clients that complete (12 month) AMP ▪ # of clients who pay off arrearages ▪ # of clients who avoid a disconnect notice
15	An intended medium-term outcome of clients having an ***Improved understanding of their energy bills and energy topics (I)*** is they ***Apply knowledge to independently avoid or resolve needs and disputes (N).*** Once clients have a better understanding of their energy bills and energy topics, they should be able to use that knowledge to identify issues with their bill independently or know who to contact to get help. If they learn about energy-saving tips, they may avoid a billing issue altogether. And, when provided information about legitimate energy services and organizations compared to predatory or fraudulent companies, they should be better able to avoid fraud.	▪ # of former CHANGES clients who contact utility directly ▪ # of former CHANGES clients who lower their energy bills through proactive energy conservation ▪ # of former CHANGES clients who avoid a bill issue within one year, two years, or ever ▪ # of former CHANGES clients who do not go back to the CBO for an energy need within one year, two years
16	An intended medium-term outcome of the ***Increased use of CBO's CHANGES services (K)*** will be ***More client needs being met (O)*** in the medium and long term. By offering CHANGES services that assist low-income or limited-English clients in resolving their issues, disputes, and needs, client needs will be met.	▪ # of clients who attended education workshops ▪ # of clients who received one-on-one case assistance ▪ # of disputes resolved annually ▪ # of clients referred to other programs ▪ # of clients who had a bill adjusted ▪ # of former CHANGES clients who go back to the CBO within one year for an energy need *different from* the need they initially were served for
17	***Greater use of eligible programs like financial assistance (L)*** will lead to ***More client needs being met (O)*** in the medium and long term. When clients participate in the other assistance programs, whether one-time payment programs or alternative rate plans, they are likely to get more of their needs met.	▪ # of clients who received one-on-one case assistance ▪ # of clients referred to other programs ▪ # of clients who had a bill adjusted
18	***Increased adjustment of bills and client ability to pay (M)*** leads to ***More client needs being met (O)*** in the medium and long term. As bills get adjusted down, clients will be better able to afford their energy bills, which meets their needs.	▪ # of clients with bill adjustments ▪ Proportion of clients who had a bill adjusted and seek no additional services within one year, two years, or ever
19	Once clients ***Apply knowledge to independently avoid or resolve needs and disputes (N),*** there will be ***More client needs being met (O)*** in the medium and long term. Clients can use their knowledge of energy bills and energy topics to meet their own needs without visiting the CBO again.	▪ Proportion of CHANGES clients who attend an educational workshop and seek no additional services within one year, two years, or ever
20	With ***More client needs being met (O)*** in the medium and long term, we expect to see ***Increased CBO referrals to family and friends (P)*** for CHANGES services. When needs are met and disputes are resolved satisfactorily, the	▪ Measures of client trust in the CBO ▪ Measures of client satisfaction with the CBO

Link	Segment Theory	Potential Key Performance Indicators for Future Consideration
	client should be satisfied with the services received from the CBO and will let their friends and family know that the CBO is available and able to assist with energy-related issues.	▪ Proportion of clients referred to CHANGES CBO by prior client
21	The ***Increased CBO referrals to family and friends (P) will lead to Greater awareness of the CBO's ability to help (J).*** When satisfied clients inform their friends and family about the CBO and their positive experience, then that leads to greater awareness of the CBO and their ability to help with energy-related needs. This should improve awareness among the community about the CBO and its energy services.	▪ # of CHANGES clients referring friends and family ▪ # of clients referred to CHANGES CBO by prior client ▪ Measures of awareness of CBO energy services ▪ Measures of awareness of CBO energy services by language

Assessment of Costs and Benefits

Data processing: After receiving the financial data, the evaluation team conducted a QA/QC of summary files compared to the pdf versions of the invoices. We reviewed both the CPUC invoices from SHE and IOU invoices from the CPUC. Next, we reorganized the data from program year to calendar year. CHANGES is implemented from June through May, thus the invoice data and year to date (YTD) summaries were at the program level. However, our evaluation is conducted at the calendar year level, so we needed to re-aggregate the data to fit the needs of the evaluation. After these steps were completed, the evaluation team was able to begin analyzing the criteria mentioned above. The criteria specific to survey data were analyzed in SPSS and exported to Excel to create figures and tables. The criteria specific to secondary data were analyzed in Excel.

APPENDIX C. ADDITIONAL MAPS

Figure 25. CBOs Serving County - Northern and Central California Zoom

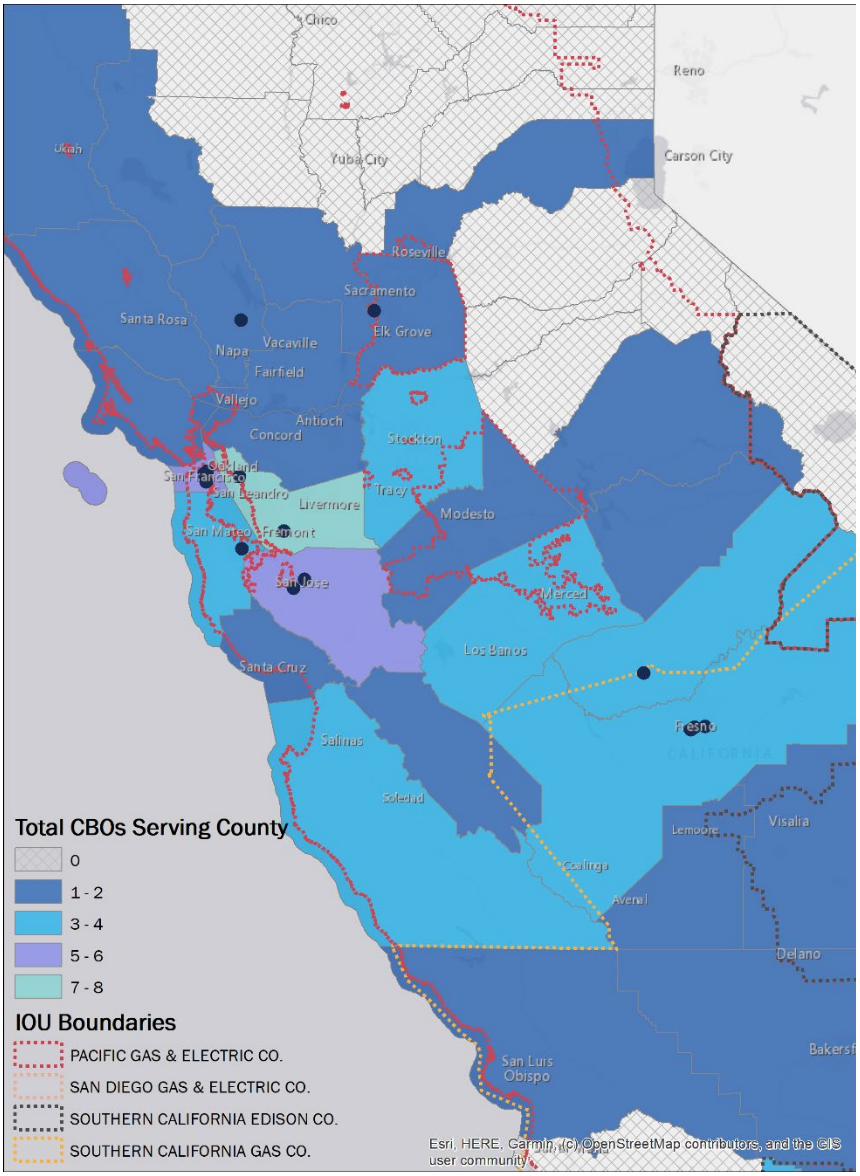


Figure 26. CBOs Serving County - Southern California Zoom

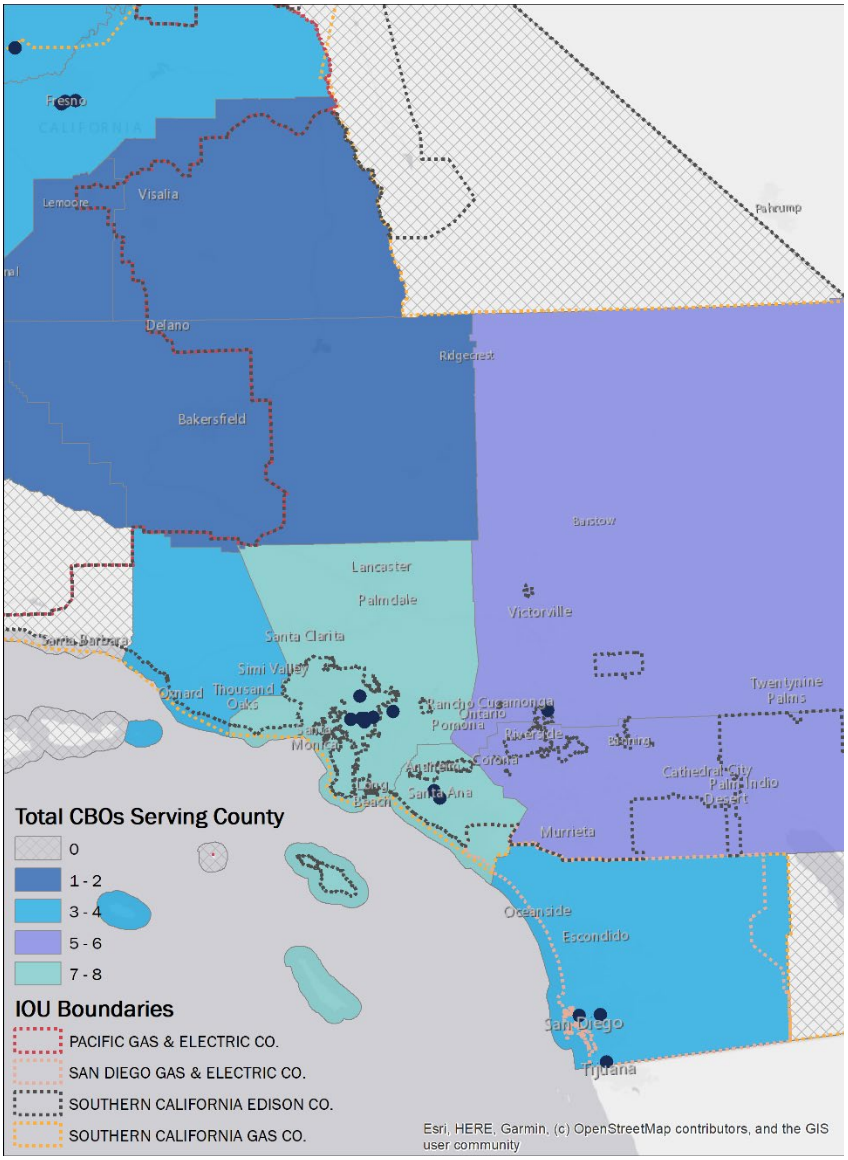


Figure 27. CHANGES Participants by County - Northern and Central CA Zoom

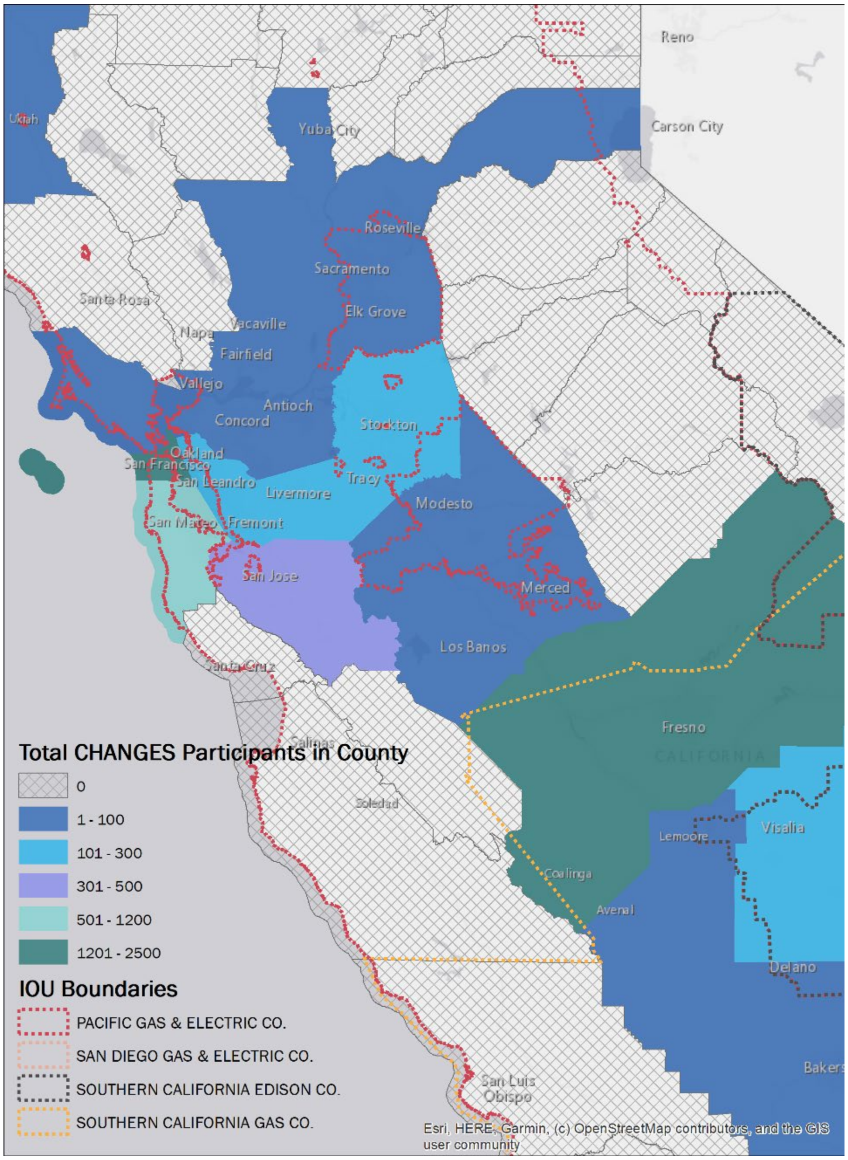
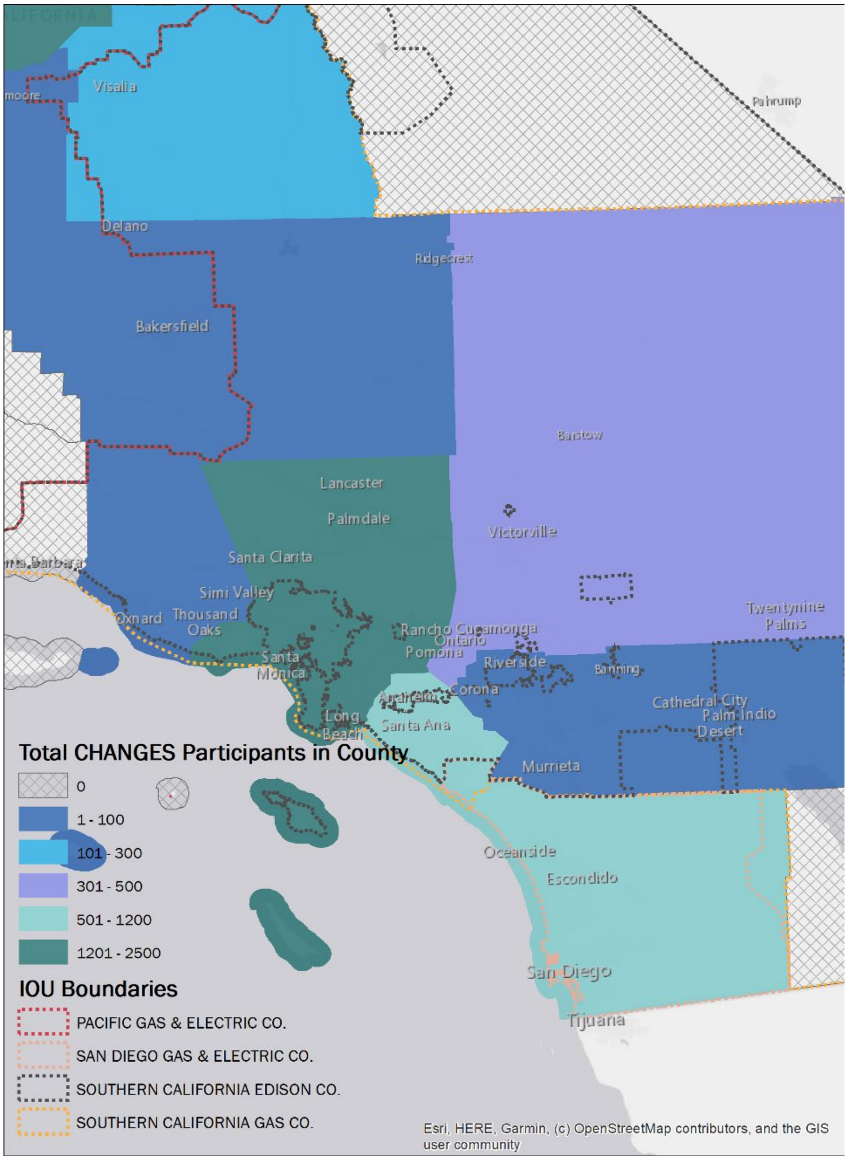


Figure 28. CHANGES Participants by County - Southern CA Zoom



APPENDIX D. DETAILED FINDINGS

SERVICES BY LANGUAGE

From 2019 to 2021, CHANGES CBOs provided at least one service in 44 different languages. Table 46 displays program activity by language.

Table 46. CHANGES Program Activity by Language

Language	Case Assistance (Total Cases)	Education (Events)	Community Outreach	Media Outreach	Total
Albanian	3	6	0	0	9
Amharic	2	0	0	0	2
Arabic	63	243	2	0	308
Armenian	570	332	4	9	915
Brazilian Portuguese	1	0	0	0	1
Burmese	0	1	0	0	1
Cambodian	226	34	3	0	263
Cantonese	2,626	527	40	14	3,207
Cebuano	2	0	0	0	2
Chaldean	1	2	0	0	3
Dari	387	296	5	4	692
English	1,808	1,053	69	1	2,931
Eritrean	2	1	0	0	3
Farsi	19	65	1	0	85
French	15	26	0	0	41
Hindi	3	5	0	0	8
Hmong	215	24	7	3	249
Igbo	1	0	0	0	1
Indonesian	1	0	0	0	1
Japanese	15	20	8	0	43
Karen	2	1	0	0	3
Khmer	8	1	0	0	9
Kinyarwanda	0	1	0	0	1
Korean	732	319	4	23	1,078
Laotian	71	13	2	0	86
Mandarin	110	219	40	6	375
Mein	0	0	1	0	1
Native American English	7	61	1	0	69
Pashto	32	7	1	0	40
Persian	4	1	0	0	5
Portuguese	113	28	2	7	150
Punjabi	3	2	0	0	5
Russian	1	5	2	0	8

Language	Case Assistance (Total Cases)	Education (Events)	Community Outreach	Media Outreach	Total
Samoan	12	1	4	0	17
Sign Language	9	15	0	0	24
Somali	5	5	0	0	10
Spanish	6,017	1,548	98	27	7,690
Swahili	6	16	0	0	22
Tagalog	27	108	8	1	144
Thai	2	0	0	0	2
Tigrinya	1	0	0	0	1
Urdu	14	1	0	0	15
Vietnamese	1,420	444	36	18	1,918
Yoruba	2	0	0	0	2

CASE ASSISTANCE BY IOU BY YEAR

Table 47. CHANGES Case Assistance by IOU by Year (2019 – 2021)

IOU	Cases					
	2019		2020		2021	
PG&E	2,478	63%	2,802	60%	4,085	69%
SCE	732	28%	682	15%	796	13%
SCG	575	15%	789	17%	753	13%
SDG&E	175	4%	373	8%	318	5%
Total	**3,960**	**100%**	**4,646**	**100%**	**5,952**	**100%**

COMMUNITY OUTREACH EVENTS

Table 48 portrays the breakdown of community events and people reached by CBO.

Table 48. Community Outreach by CBO (2019 – 2021)

CBO	People Reached			Number of Events		
	2019	2020	2021	2019	2020	2021
CBO 1	2,110		500	5		1
CBO 2	12,550			4		
CBO 3	17,400			14		
CBO 4	21,214	1,000	550	5	1	1
CBO 5	18,060	1,000	3,000	24	2	1
CBO 6	6,777	700	1,100	12	1	3
CBO 7	5,850		600	11		1
CBO 8	3,420	2,120	1,580	6	3	2
CBO 9	7,300	2,500		11	2	
CBO 10	40,000	15,000		1	1	
CBO 11	550			1		
CBO 12	11,900	500		11	1	
CBO 13	2,000	1,000	3,000	3	2	4
CBO 14	2,650			5		
CBO 15	600			1		
CBO 16	1,550			3		
CBO 17	7,600	10,700	5,600	3	2	2
CBO 18	1,490			7		
CBO 19	1,500			3		
CBO 20	15,000	700		1	1	
CBO 21	510,800	2,700	500	14	3	1
CBO 22	5,930	3,989		22	12	
CBO 23	3,000			1		

Table 49 displays the number of community outreach events by language.

Table 49. Community Outreach Events by Language (2019 – 2021)

Language	Community Outreach Events			
	2019	2020	2021	Total
Spanish	33	13	4	98
English	66	7	3	69
Cantonese	15	0	1	40
Mandarin	10	0	0	40
Vietnamese	41	7	11	36
Japanese	4	4	0	8
Tagalog	10	0	0	8
Hmong	20	2	0	7
Dari	2	1	1	5
Armenian	17	1	1	4
Korean	27	1	0	4
Samoan	3	0	0	4
Cambodian	23	1	0	3
Arabic	2	0	0	2
Russian	4	0	0	2
Laotian	2	0	0	2
Portuguese	1	0	0	2
Native American English	1	0	0	1
Pashto	1	1	0	1
Farsi	1	0	0	1
Mein	1	0	0	1

MEDIA OUTREACH EVENTS

Table 50 portrays the breakdown of media outreach events and people reached by the 19 CBOs that conducted media outreach.

Table 50. Media Outreach by CBO (2019 – 2021)

CBO	People Reached			Media Outreach Events		
	2019	2020	2021	2019	2020	2021
CBO 1	10,000	10,000	20,000	1	2	2
CBO 2	57,700	10,100	30,600	5	1	3
CBO 3			10,000			1
CBO 4	150,000	75,000	15,000	1	5	1
CBO 5	20,000	157,390	20,000	2	6	2
CBO 6	40,000	80,000		1	2	
CBO 7	105,000	35,000		4	1	
CBO 8			12,000			1
CBO 9	165,000	190,000	80,000	4	5	2
CBO 10		44,000	10,000		3	1
CBO 11	20,000	45,000		2	1	
CBO 12	90,000	45,000	60,000	3	2	3
CBO 13	210,000	440,000		7	2	
CBO 14		80,000	222,000		2	4
CBO 15	50,000	110,000	200,000	1	2	2
CBO 16	800,000	800,000	420,000	2	2	3
CBO 17			10,000			1
CBO 18	40,000	20,000	10,000	2	1	1
CBO 19		449,616	302,299		9	5

Table 51 illustrates the number of events and people reached by language by year.

Table 51. Media Outreach Events by Language (2019 – 2021)

Language	People Reached			Media Outreach Events		
	2019	2020	2021	2019	2020	2021
Armenian	57,700	10,100	30,600	5	1	3
Cantonese	165,000	205,000	102,000	4	6	4
Dari		10,000	20,000		2	2
English	10,000			1		
Hmong	20,000	45,000		2	1	
Korean	300,000	565,000	282,000	10	6	7
Mandarin	150,000	60,000	15,000	1	4	1
Portuguese	800,000	800,000	420,000	2	2	3
Spanish	215,000	426,390	230,000	8	14	5
Tagalog			10,000			1
Vietnamese	40,000	469,616	312,299	2	10	6

EDUCATIONAL EVENTS

While education events are not intended to serve as 1:1 education, participation data indicate there were 233 cases during the evaluation period where the total number of participants for the educational event was 1. This seemingly differs from the 1:1 case assistance resolution type, “Consumer Education Only.” It is also likely that some consumers are being educated about specific energy topics by nature of receiving case assistance on that topic, although not formally recorded.

Table 52 illustrates the breakdown of educational workshops by CBO and year, showing the number of education events and the number of participants in each year by each CBO.

Table 52. Educational Workshops and Participation by CBO (2019 – 2021)

Education by CBO	Participants				Events			
	2019	2020	2021	Total	2019	2020	2021	Total
CBO 1	924	837	1,380	3,141	121	91	70	282
CBO 2	1,243	559	1,808	3,610	405	61	186	652
CBO 3	1,166	443	1,474	3,083	123	64	142	329
CBO 4	777	159	14	950	115	21	3	139
CBO 5	728	1,333	1,695	3,756	24	105	74	203
CBO 6	1,209	324		1,533	153	35		188
CBO 7	1,041	426	469	1,936	49	13	21	83
CBO 8	693	269	247	1,209	90	28	23	141
CBO 9	1,370	841	475	2,686	73	68	14	155
CBO 10	1,192	423	138	1,753	87	30	6	123
CBO 11	2,157	1,205	2,051	5,413	98	48	84	230
CBO 12	145	142	3	290	11	9	1	21
CBO 13	1,122	416	513	2,051	68	25	16	109
CBO 14	3,102	1,795	1,700	6,597	124	155	145	424
CBO 15	2,718	964		3,682	172	55		227
CBO 16	884	154	234	1,272	66	13	23	102
CBO 17	866	194	412	1,472	72	12	18	102
CBO 18	1,148	394	1,136	2,678	44	17	41	102
CBO 19	1,679	766	641	3,086	158	150	148	456
CBO 20	821	104	467	1,392	33	12	26	71
CBO 21	2,210	588	361	3,159	75	24	11	110
CBO 22	1,223	222	242	1,687	73	16	18	107
CBO 23	1,427	140	42	1,609	52	9	3	64
CBO 24	1,273	903	1,572	3,748	22	27	39	88
CBO 25	2,790	2,306	3,079	8,175	34	40	291	365
CBO 26	1,519	792	816	3,127	118	71	46	235
CBO 27	3,887	3,059	2,849	9,795	124	100	99	323

Table 53 displays educational events by language each year.

Table 53. Educational Workshop and Participants by Language (2019 – 2021)

Participants by Language	Participants			Events		
	2019	2020	2021	2019	2020	2021
Spanish	14,788	5,862	4,510	819	427	302
English	6,192	3,586	2,767	573	247	233
Cantonese	4,633	2,617	4,491	187	110	230
Vietnamese	4,305	3,042	3,169	117	97	230
Korean	2,287	877	1,773	113	89	117
Mandarin	946	1,073	1,557	74	79	66
Dari	1,007	837	1,380	135	91	70
Armenian	1,173	443	1,474	126	64	142
Native American English		512	1,466		16	45
Tagalog	1,206	217	242	75	15	18
Arabic	429	218	778	139	24	80
Portuguese	997	108	29	22	4	2
Cambodian	355	92		24	10	
Japanese	232	26	109	12	3	5
Hmong	166	11	45	19	3	2
Farsi	181	20		62	3	
Sign Language	52	142	3	5	9	1
French	140			26		
Laotian	27	48	17	5	5	3
Somali	50	18		3	2	
Swahili	43			16		
Albanian	29			6		
Hindi	28			5		
Russian	18			5		
Pashto	14			7		
Samoan		9			1	
Khmer			5			1
Punjabi	5			2		
Karen			3			1
Urdu	3			1		
Chaldean	2			2		
Eritrean	2			1		
Persian	2			1		
Burmese	1			1		

Participants by Language	Participants			Events		
	2019	2020	2021	2019	2020	2021
Kinyarwanda	1			1		

ONE-ON-ONE CASE ASSISTANCE

Table 54 shows the number of case assistance services that were provided by resolution type, per year.

Table 54. Case Assistance by Resolution and Type (2019 – 2021)

Case Assistance	2019 Cases	2020 Cases	2021 Cases	Total Cases
LiHEAP	1,531	1,947	2,709	6,187
Electricity Aggregation	365	403	259	1,027
Assist with Changes to Account	291	418	183	892
Gas Assistance Fund (So Cal Gas Only)	158	453	265	876
Payment Plan (Not AMP)	428	220	168	816
New Arrearage Management Plan (AMP)	0	0	802	802
Gas Aggregation	130	253	275	658
REACH (PG&E Only)	48	249	349	646
CARE/FERA	63	165	318	546
Changed Bill Language	137	208	179	524
Medical Baseline Application Assistance	176	202	146	524
Neighbor to Neighbor (SDG&E Only)	99	290	111	500
Payment Extension	215	151	113	479
Refer to Energy Assistance Programs	212	201	52	465
Stop Disconnection	347	104	10	461
ESA Program	134	128	133	395
Changed Third-Party Company	232	19	8	259
Energy Assistance Fund (So Cal Edison only)	43	115	94	252
Medical Baseline	5	2	210	217
Set Up New Account	45	45	59	149
Other Payment Assistance (private, faith organization, emergency fund, etc.)	0	0	139	139
Bill Amount Adjusted	37	40	33	110
Energy Efficiency Tool	3	21	86	110
Changed Consumer Information on Account	5	14	85	104
Rate Plan Selection Assistance	0	0	101	101
COVID-19 Emergency Utility Payment	0	0	100	100
Assist w/ CARE Recertification/Audit	69	16	0	85
Solar	11	38	25	74
Arrearage Management Plan – Follow-Up	0	0	72	72

Case Assistance	2019 Cases	2020 Cases	2021 Cases	Total Cases
Enroll in Medical Baseline	31	26	5	62
Scheduled Customer Service Visit	26	16	9	51
Energy Assistance Fund (PG&E)	4	22	18	44
Set Up Online Account Access	0	0	36	36
Energy Audit	2	23	10	35
Assisted Client with Making a Payment	0	0	34	34
Assisted with CARE Certification/Audit	16	11	1	28
Add/Remove Paperless Billing	0	0	20	20
Assisted with Closing Account	0	0	18	18
Meter Service/Testing	7	6	4	17
High Energy User Dispute	1	14	1	16
CARE High Energy User Document Submission	4	2	9	15
NULL	6	3	3	12
Consumer Education Only (must be pre-approved by CHANGES administration)	3	6	2	11
Demand Response Program (Summer Savings)	0	0	9	9
Level Pay Plan	7	2	0	9
Report Scam	2	5	2	9
Reported Safety Problem	3	1	3	7
Add/Remove Automatic Payments	0	0	6	6
3rd Party Notification	0	0	4	4
CARE Discount not Credited to Account	0	2	1	3
Collections	0	0	3	3
Set Up Energy Alerts	0	0	3	3
AMP Enrollment or Billing Problem	0	0	2	2
CARE Enrollment Problem	0	0	2	2
Cancelled 24-month COVID Payment Plan	0	0	2	2
Time of Use	0	2	0	2
AMP Billing or Enrollment Problem	0	0	1	1
Service Reconnection	0	0	1	1
Utility Company Refused to Speak with CBO/Insisted on Speaking with Client	0	0	1	1

Table 55 shows the number of unique clients, resolutions, and cases per year per CBO.

Table 55. Case Assistance Services by CBO (2019 – 2021)

	Unique Clients			Resolutions			Cases		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
CBO 1	95	65	79	164	83	162	161	83	159
CBO 2	15	50	64	18	73	95	15	51	65
CBO 3	184	164	212	189	167	222	184	164	212
CBO 4	188	118	29	238	150	47	214	131	41
CBO 5	0	1	0	0	1	0	0	1	0
CBO 6	238	207	210	331	277	242	261	248	242
CBO 7	153	314	218	212	345	255	155	321	245
CBO 8	271	100	113	411	130	135	274	101	113
CBO 9	198	165	187	308	241	407	222	194	212
CBO 10	204	191	212	229	218	257	227	218	257
CBO 11	230	336	602	264	426	742	254	371	662
CBO 12	4	0	6	9	0	9	4	0	7
CBO 13	83	100	94	142	179	156	120	165	145
CBO 14	280	284	451	289	304	531	281	291	484
CBO 15	184	169	176	255	211	204	195	182	188
CBO 16	65	84	76	101	124	100	80	119	97
CBO 17	44	47	133	88	96	219	55	56	193
CBO 18	134	90	111	193	103	142	184	100	139
CBO 19	56	372	182	59	411	204	57	411	204
CBO 20	67	50	81	80	63	113	77	57	108
CBO 21	263	563	998	498	1,151	2,036	300	611	1,259
CBO 22	1	1	6	1	2	6	1	1	6
CBO 23	33	34	31	42	49	55	42	45	46
CBO 24	200	266	276	378	582	365	210	269	287
CBO 25	206	251	317	273	352	445	268	352	439
CBO 26	118	99	111	118	105	142	118	104	140
CBO 27	1	0	2	6	0	3	1	0	2

Table 56 shows the number of unique clients, cases, and resolutions by language by year.

Table 56. Case Assistance Services by Language (2019 – 2021)

	Unique Clients			Resolutions			Cases		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
Spanish	1,098	1,848	2,248	1,621	2,768	3,692	1,227	2,065	2,725
Cantonese	573	734	1,064	805	1,177	1,349	627	810	1,189
English	672	470	499	979	596	708	706	532	570
Vietnamese	360	353	418	430	439	565	424	436	560
Korean	202	174	214	274	208	278	261	199	272
Armenian	189	167	213	195	170	223	190	167	213
Dari	97	63	74	168	85	150	163	80	144
Cambodian	103	70	25	132	87	27	118	83	25
Hmong	79	74	50	111	91	56	84	79	52
Portuguese	30	31	23	38	43	43	38	41	34
Mandarin	24	37	38	27	45	40	26	44	40
Laotian	24	30	10	33	33	10	29	32	10
Arabic	6	14	42	11	17	61	7	14	42
Pashto	7	4	9	9	6	18	9	5	18
Tagalog	9	5	13	11	7	13	9	5	13
Farsi	7	9	2	8	14	2	7	10	2
French	1	8	4	1	14	7	1	9	5
Japanese	6	5	2	7	8	2	6	7	2
Urdu	2	6	3	2	8	6	2	6	6
Samoan	0	4	5	0	9	10	0	6	6
Sign Language	2	0	6	3	0	9	2	0	7
Khmer	7	1	0	11	1	0	7	1	0
Native American English	1	2	2	1	4	4	1	3	3
Swahili	2	0	4	2	0	6	2	0	4
Somali	3	1	1	3	1	3	3	1	1
Persian	1	2	1	1	2	3	1	2	1
Albanian	0	1	2	0	1	2	0	1	2
Hindi	2	1	0	2	1	0	2	1	0
Punjabi	1	2	0	1	3	0	1	2	0
Amharic	1	1	0	2	1	0	1	1	0
Cebuano	1	0	1	2	0	1	1	0	1
Eritrean	1	0	1	2	0	1	1	0	1
Karen	1	0	1	1	0	1	1	0	1
Thai	0	0	1	0	0	2	0	0	2

	Unique Clients			Resolutions			Cases		
	2019	2020	2021	2019	2020	2021	2019	2020	2021
Yoruba	0	2	0	0	2	0	0	2	0
Brazilian Portuguese	1	0	0	1	0	0	1	0	0
Chaldean	0	0	1	0	0	2	0	0	1
Igbo	1	0	0	1	0	0	1	0	0
Indonesian	1	0	0	1	0	0	1	0	0
Russian	0	1	0	0	1	0	0	1	0
Tigrinya	0	1	0	0	1	0	0	1	0
Total	**3,515**	**4,121**	**4,977**	**4,896**	**5,843**	**7,294**	**3,960**	**4,646**	**5,952**

Table 57. CHANGES Repeat Case Assistance Clients by Resolution Type

Resolution Type	Cases	Unique Participants	Repeats by Resolution
Assisted Client with Making a Payment	34	21	1.62
LiHEAP	6187	5095	1.21
Gas Assistance Fund (So Cal Gas Only)	876	722	1.21
Energy Assistance Fund (So Cal Edison Only)	252	218	1.16
REACH (PG&E Only)	646	574	1.13
Payment Extension	479	428	1.12
Assist with Changes to Account	892	809	1.10
Arrearage Management Plan – Follow-Up	72	67	1.07
ESA Program	395	371	1.06
Payment Plan (Not AMP)	816	767	1.06
Assist w/ CARE recertification/audit	85	80	1.06
Energy Audit	35	33	1.06
Assisted with Closing Account	18	17	1.06
Gas Aggregation	658	622	1.06
Set Up New Account	149	141	1.06
Changed Consumer Information on Account	104	99	1.05
Changed Bill Language	524	500	1.05
Neighbor to Neighbor (SDG&E Only)	500	482	1.04
Assisted with CARE certification/audit	28	27	1.04
Stop Disconnection	461	446	1.03
New Arrearage Management Plan (AMP)	802	776	1.03
Medical Baseline	217	210	1.03
CARE/FERA	546	529	1.03
Other Payment Assistance (private, faith organization, emergency fund, etc.)	139	135	1.03
Medical baseline application assistance	524	509	1.03
Changed third-party company	259	252	1.03
Refer to Energy Assistance Programs	465	454	1.02
COVID-19 Emergency Utility Payment	100	98	1.02

Resolution Type	Cases	Unique Participants	Repeats by Resolution
Rate Plan Selection Assistance	101	99	1.02
Electricity Aggregation	1027	1007	1.02
Energy Efficiency Tool	110	108	1.02
Solar	74	73	1.01
Bill Amount Adjusted	110	109	1.01
Enroll in Medical Baseline	62	62	1
Scheduled Customer Service Visit	51	51	1
Energy Assistance Fund (PG&E)	44	44	1
Set Up Online Account Access	36	36	1
Add/Remove Paperless Billing	20	20	1
Meter Service/Testing	17	17	1
High Energy User Dispute	16	16	1
CARE High Energy User Document Submission	15	15	1
NULL	12	12	1
Consumer Education Only (must be pre-approved by CHANGES administration)	11	11	1
Demand Response Program (Summer Savings)	9	9	1
Level Pay Plan	9	9	1
Reported Safety Problem	7	7	1
Add/Remove Automatic Payments	6	6	1
Reported Scam	6	6	1
3rd Party Notification	4	4	1
CARE Discount not Credited to Account	3	3	1
Collections	3	3	1
Report Scam	3	3	1
Set Up Energy Alerts	3	3	1
AMP Enrollment or Billing Problem	2	2	1
Cancelled 24-month COVID Payment Plan	2	2	1
CARE Enrollment Problem	2	2	1
Time of Use	2	2	1
AMP Billing or Enrollment Problem	1	1	1
Service Reconnection	1	1	1
Utility Company Refused to Speak with CBO/Insisted on speaking with Client	1	1	1

Table 58. Percentage of CARE-related Services (2019 – 2021)

	2019 Cases	2020 Cases	2021 Cases	Total Cases
All CARE Categories	**152**	**196**	**331**	**679**
CARE/FERA	*63*	*165*	*318*	*546*
Assist w/ CARE recertification/audit	*69*	*16*	*0*	*85*
Assisted with CARE certification/audit	*16*	*11*	*1*	*28*
CARE High Energy User Document Submission	*4*	*2*	*9*	*15*

	2019 Cases	2020 Cases	2021 Cases	Total Cases
CARE Discount not Credited to Account	*0*	*2*	*1*	*3*
CARE Enrollment Problem	*0*	*0*	*2*	*2*
Percent of Services				*3.7%*

CASE ASSISTANCE CLIENTS BY AGE

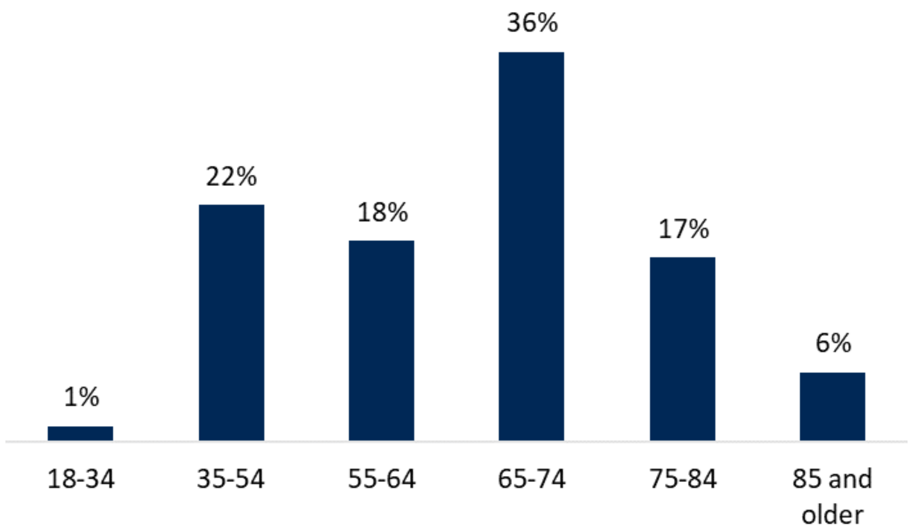
Per the program data analysis, about one-third (34%) of CHANGES clients who received case assistance services in 2019 through 2021 were seniors, aged 65 years or older (see Table 59).

Table 59. CHANGES Clients by Age Group (n=10,831)

Age Group	Unique Clients	Percent of Clients
65 and above	3,703	34%
under 65	7,128	66%

The sample of survey participants skewed older than the population of CBO clients, per program records. More than half (59%) of the survey participants were aged 65 or older (Figure 29).

Figure 29. Age Ranges of Surveyed CHANGES Clients (n=208)



CBO PERCEPTIONS OF CHANGES CLIENTS SERVED

The ten interviews conducted with CBOs, and the participant survey, confirmed much of the participation data.

The interviewed CHANGES CBOs reported primarily serving low-income, LEP, and senior customers (Table 60). The CBOs commonly defined low-income as those whose household incomes fall below 200% of the federal poverty line. Other groups served by the CHANGES CBOs included clients who spoke Japanese, Chinese, Spanish, Vietnamese, and Korean as their first language, with several CBOs offering services in more than one language. A handful of CBOs also served veterans, undocumented people, and refugees.

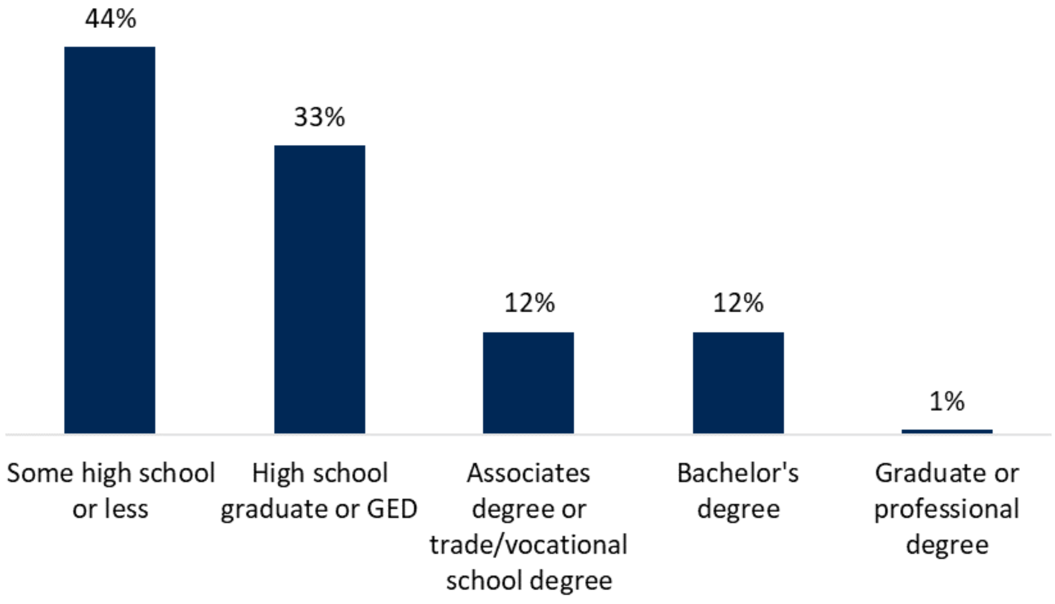
Table 60. CHANGES Clients Served by Interviewed CBOs (n=10)

Types of Clients	Number of CBOs
Low-Income/Unemployed	10
Limited-English Proficient	10
Seniors	7
Immigrants/Recently Arrived to USA	4
Non-Low-Income	3
Unemployed	2
Veterans	1
Undocumented people	1
Refugees	1

Almost no surveyed CHANGES clients were veterans. Only 3 of 199 (1.5%) reported being a veteran. This may be because there are a variety of other support services available to veterans, which means they do not need to access the support from the CHANGES network of CBOs. Or, it may be because few veterans have LEP.

A majority of surveyed CHANGES clients had at least a high school education or some form of less formal learning experience (Figure 30). The minority had attended higher education.

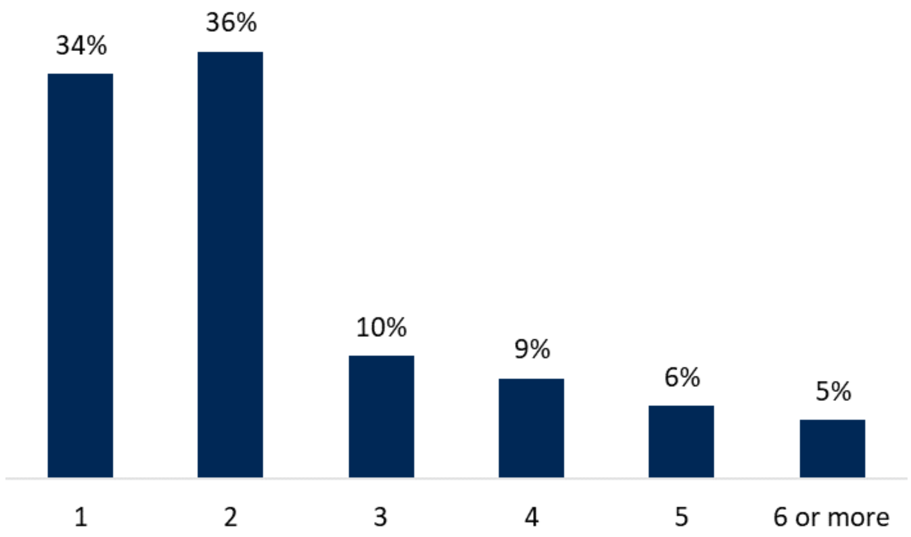
Figure 30. Educational Attainment of Surveyed CHANGES Clients (n=172)



Note: Totals sum to more than 100% due to rounding

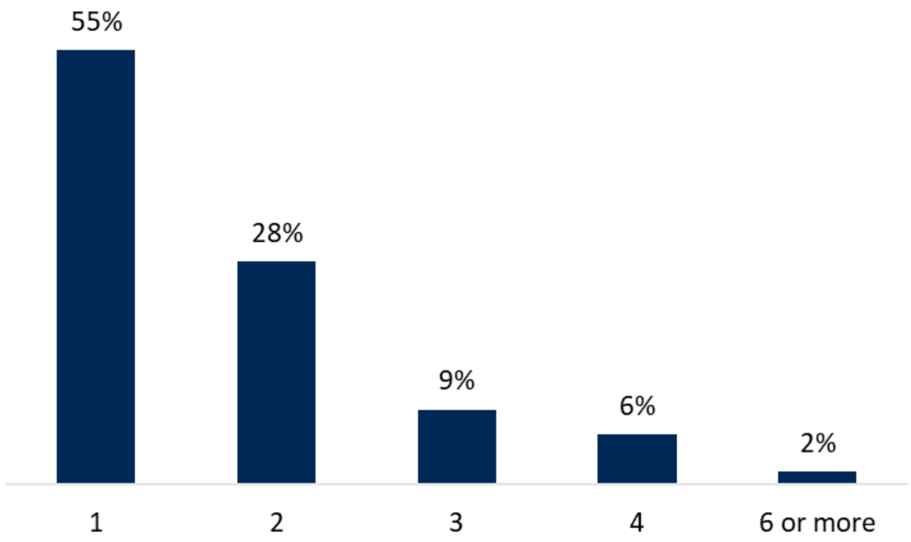
Surveyed CHANGES households tended to be small, with two people or fewer living in the home year-round (Figure 31). This finding may reflect the fact that our sample tended to be seniors over the age of 65 and might not have children living at home with them.

Figure 31. Household Size of Surveyed CHANGES Clients (n=211)



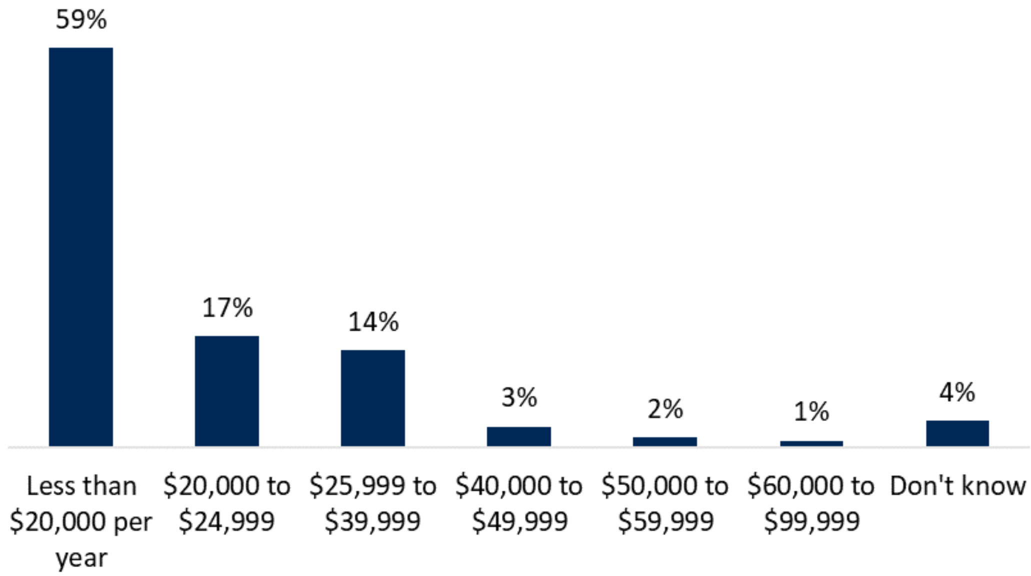
A total of 64 CHANGES clients answered the survey question about children under 18 living in the home year-round (Figure 32). Of those with children, the majority had one minor living in the home year-round (35 of 64; 55%).

Figure 32. Number of People Under 18 in the Home (n=64)



More than half of surveyed CHANGES clients reported their annual household income was less than $20,000 (Figure 33). Three percent reported making at least $50,000 and four percent did not know their annual income in 2021.

Figure 33. Surveyed CHANGES Clients' Household Income in 2021 (n=194)



IOU COSTS BY ACTIVITY TYPE

Table 61 through Table 64 detail the costs per IOU by Activity Type. This information is based on the funding breakdown in the above table and verified through invoices. Note that the invoices break down costs by complaint resolution and needs assistance, but the program tracking data we received do not, as they are based on resolution/solution, not customer problem.

Table 61. PG&E Costs by Activity Type

PG&E	2019	2020	2021
Activity Type			
Education	$ 118,212.87	$ 59,912.99	$ 73,832.71
Outreach	$ 43,950.00	$ 41,850.00	$ 41,850.00
Complaint Resolution	$ 54,360.00	$ 39,330.00	$ 27,315.00
Needs Assistance	$ 59,917.50	$ 83,520.00	$ 118,665.00
Total	$ 276,440.37	$ 224,612.99	$ 261,662.71

Table 62. SCE Costs by Activity Type

SCE	2019	2020	2021
Activity Type			
Education	$ 118,212.87	$ 59,912.99	$ 73,832.71
Outreach	$ 43,950.00	$ 41,850.00	$ 41,850.00
Complaint Resolution	$ 54,360.00	$ 39,330.00	$ 27,315.00

SCE	2019	2020	2021
Needs Assistance	$ 59,917.50	$ 83,520.00	$ 118,665.00
Total	$ 276,440.37	$ 224,612.99	$ 261,662.71

Table 63. SDG&E Costs by Activity Type

SDG&E	2019	2020	2021
Activity Type			
Education	$59,106.43	$29,956.50	$36,916.35
Outreach	$21,975.00	$20,925.00	$20,925.00
Complaint Resolution	$27,180.00	$19,665.00	$13,657.50
Needs Assistance	$29,958.75	$41,760.00	$59,332.50
Total	$138,220.18	$112,306.50	$130,831.35

Table 64. SCG Costs by Activity Type

SCG	2019	2020	2021
Activity Type			
Education	$98,510.72	$49,927.50	$61,527.26
Outreach	$36,625.00	$34,875.00	$34,875.00
Complaint Resolution	$45,300.00	$32,775.00	$22,762.50
Needs Assistance	$49,931.25	$69,600.00	$98,887.50
Total	$230,366.97	$187,177.50	$218,052.26

Interviewee Perceptions of Funding Expansion

When discussing CHANGES Program funding and how it relates to the program's value, all 10 CBO representatives interviewed believed that funding for the program should be expanded. Common reasons for expanding program funding mentioned by CBO staff included being able to serve more clients in their communities; offer emergency monetary assistance to customers in need; getting reimbursed for assisting clients in non-IOU territories; getting adequately reimbursed for the full length of time-consuming services; and hiring additional staff.

Non-CBO organization representatives had mixed opinions about whether funding for the CHANGES Program should be expanded, reduced, or modified in any way. While some representatives (two) believe that funding should be expanded to reach more people, especially in areas with large populations of LEP customers that are currently underserved by the program (which is reflected in our earlier findings in Section 4.5.2); others (two) think that the program funding structure should be modified so that it does not come from CARE funding but from a general rate. One representative believes that program funding is appropriate, while another reported not having enough information to offer an opinion.

APPENDIX E. ADDITIONAL CBO FOCUSED TABLES

Table 65 lists the CBOs within the CHANGES network during the evaluation period along with the counties they serve. This list is publicly available on the CHANGES website.

Table 65. CBOs within CHANGES Network, 2019 - 2021

CBO	Counties served
ACC Senior Services	Yolo, Sacramento, Placer, San Joaquin
Afghan Coalition	Alameda, Stanislaus, San Joaquin
Alliance for African Assistance	San Diego
Armenian Relief Society	Los Angeles
Asian American Resource Center	Riverside, San Bernardino,
Asian Youth Center	Lancaster
Casa Familiar	San Diego
Central California Legal Services	Fresno, Madera, Mariposa, Merced, San Luis Obispo, Kings, Monterey, San Benito, San Joaquin, Tulare, Tuolumne
Centro La Familia	Fresno, Madera, Mariposa, Merced, San Luis Obispo, Kings, Monterey, San Benito, San Joaquin, Tulare, Tuolumne
Centro Legal De La Raza	Alameda
Chinatown Service Center	Los Angeles, Orange, San Bernardino, Riverside and Ventura
Chinese Newcomers Service Center	San Francisco
Deaf Community Services of SD	San Diego
Delhi Center	Orange County
El Concilio of San Mateo County	San Mateo, San Francisco, Santa Cruz, Monterey, Alameda, Santa Clara, Contra Costa
Fresno Center	Fresno
Good Samaritan Family Resource Center	San Francisco
International Institute of Los Angeles	Los Angeles, Kern, Orange, Riverside, San Bernardino, Ventura
Korean American Community Services	Alameda, San Francisco, San Mateo, Santa Clara
Koreatown Youth & Community Ctr	Los Angeles, Orange, San Bernardino, Riverside and Ventura
Little Tokyo Service Center	Los Angeles, Orange, San Bernardino, Riverside and Ventura
Madera Coalition for Social Justice	Madera
Pilipino Workers Center	LA, Orange, San Diego, San Bernardino
Portuguese Community Center	Santa Clara, Alameda, Stanislaus, Merced, Sacramento,
Self-Help for the Elderly	San Mateo, San Francisco, Alameda, Santa Clara
Southeast Asian Community Center	San Mateo, San Francisco, Alameda, Santa Clara
Southland Integrated Services	LA, Orange
Suscol Intertribal Council	Napa, Solano, Marin, Sonoma, Lake, Mendocino

Table 66. LEP Households per CBO

Counties	Total Households	% LEP Households	LEP Households	CBOs	LEP Households per CBO
Los Angeles County	3,358,408	12%	412,521	8	51,565
Kern County	265,348	10%	25,500	1	25,500
Contra Costa County	410,654	6%	23,058	1	23,058
Sacramento County	578,810	6%	36,278	2	18,139
San Diego County	1,140,481	6%	71,127	4	17,782
Santa Clara County	653,266	10%	66,876	5	13,375
Riverside County	713,344	9%	61,738	5	12,348
Orange County	1,008,329	8%	83,474	7	11,925
Fresno County	312,546	10%	31,124	3	10,375
Tulare County	131,376	16%	20,586	2	10,293
Sonoma County	195,628	4%	7,929	1	7,929
Solano County	154,431	5%	7,260	1	7,260
San Bernardino County	649,104	6%	40,564	6	6,761
San Francisco County	370,933	11%	40,563	6	6,761
Alameda County	547,444	8%	45,589	7	6,513
Stanislaus County	163,777	8%	12,864	2	6,432
Monterey County	132,945	11%	15,176	3	5,059
San Mateo County	247,267	8%	19,609	4	4,902
San Joaquin County	233,213	8%	19,223	4	4,806
Santa Cruz County	89,451	5%	4,570	1	4,570
Kings County	51,675	16%	8,146	2	4,073
Ventura County	290,769	6%	16,136	4	4,034
Marin County	101,608	4%	3,920	1	3,920
Yolo County	63,720	6%	3,796	1	3,796
Merced County	80,468	12%	9,733	3	3,244
Napa County	53,865	5%	2,598	1	2,598
Placer County	146,787	2%	2,376	1	2,376
Madera County	39,941	11%	4,413	3	1,471
Mendocino County	34,898	3%	1,161	1	1,161
San Luis Obispo County	100,250	2%	2,129	2	1,065
San Benito County	19,145	9%	1,638	2	819
Lake County	21,354	3%	565	1	565
Mariposa County	12,176	2%	263	1	263
Tuolumne County	20,343	1%	160	2	80
Alpine County	815	0%	2	0	-
Sierra County	3,966	0%	4	0	-
Trinity County	8,526	0%	38	0	-
Modoc County	2,935	2%	62	0	-
Del Norte County	9,275	1%	89	0	-
Plumas County	5,319	2%	95	0	-
Siskiyou County	16,017	1%	120	0	-
Amador County	9,149	1%	130	0	-
Calaveras County	24,317	1%	172	0	-

Counties	Total Households	% LEP Households	LEP Households	CBOs	LEP Households per CBO
Lassen County	12,384	1%	185	0	-
Mono County	4,488	4%	201	0	-
Inyo County	12,572	2%	213	0	-
Nevada County	31,620	1%	254	0	-
Tehama County	23,668	2%	535	0	-
Colusa County	8,955	7%	669	0	-
Humboldt County	52,183	1%	676	0	-
Shasta County	75,927	1%	747	0	-
El Dorado County	65,125	1%	852	0	-
Glenn County	7,847	11%	854	0	-
Yuba County	32,947	4%	1,173	0	-
Butte County	80,307	2%	1,900	0	-
Sutter County	25,818	8%	1,946	0	-
Imperial County	43,278	23%	9,976	0	-
Santa Barbara County	151,922	7%	11,019	0	-

APPENDIX F. RESEARCH INSTRUMENTS

SURVEY INSTRUMENTS BY LANGUAGE

The survey instrument included all questions to be asked of CHANGES participants along with instructions on how to complete the survey. The survey was five pages in length with a one-page cover letter (survey invitation) for a total of six printed pages. Additionally, the survey included only close-ended questions so that it could be efficiently processed by optical scan. [35] The survey instruments by each language are included below.

CHANGES Survey Instrument_English

CHANGES Survey Instrument_Spanish

CHANGES Survey Instrument_Cantone

CHANGES Survey Instrument_Vietnam

CHANGES Survey Instrument_Korean

INTERVIEW GUIDES BY PROGRAM STAKEHOLDER TYPE

CBO Staff Interview Guide.pdf

CPUC Staff Interview Guide.pdf

IOU Staff Interview Guide.pdf

[35] The exception to this was one question which asked for contact information to send the incentive.

SHE Staff Interview Guide.pdf

Milestone Consulting Staff Int