2022-2024 EVALUATION OF THE COMMUNITY HELP AND AWARENESS OF NATURAL GAS AND ELECTRICITY SERVICES (CHANGES) PROGRAM

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1 EXECUTIVE SUMMARY

This report presents the findings from the 2022-2024 evaluation of the Community Help and Awareness of Natural Gas and Electricity Services (CHANGES) Program. The California Public Utilities Commission (CPUC) directed this evaluation in Decision 21-06-015, requiring evaluations of the program to "detail the benefits and cost-effectiveness of services delivered to (CHANGES) customers, including comparisons to similar initiatives nationwide". This report includes the results of the benchmarking and market profile analyses.

1.1 BACKGROUND

The CHANGES Program offers individualized case management assistance, consumer education, and program outreach to Limited-English Proficient (LEP) clients to help them better manage their natural gas and electricity services. The program is overseen by the CPUC and managed by a primary implementer through a statewide network of Community-Based Organizations (CBOs). The program serves gas and electric customers across all major Investor-Owned Utility (IOU) service territories. The CBOs help CHANGES participants by providing needs assistance (e.g., support enrolling in programs such as the Arrearage Management Plan (AMP) or CARE/FERA, assistance applying for financial relief through LIHEAP, or setting up a payment plan) and advocating with the utilities on clients' behalf regarding billing disputes or other issues. CBOs also offer energy education classes located within the community, and host outreach events at community events or through media outlets.

The CHANGES Program began as a Pilot in 2011 and was authorized as an ongoing program in December 2015 (in D.15-12-047). The annual budget for this program has remained steady (at or close to $1.7 million) since June 2016 and through 2026 (via D.21.06-015).

1.2 RESEARCH OBJECTIVE AND EVALUATION ACTIVITY

Table 1-1 presents the primary research objectives for this evaluation of the CHANGES Program along with an overview of the activities employed to conduct this research.

TABLE 1-1: RESEARCH OBJECTIVES AND EVALUATION ACTIVITIES

Research Objective	Evaluation Activities
Benchmarking Analysis	
Compare CHANGES services and offerings to similar programs administered by other jurisdictions and/or the IOUs. Identify effective and unique services or approaches that the program should consider adopting. If similar IOU programs or services exist, make recommendations for streamlining services.	▪ Literature and website review ▪ In-depth interviews (IDI)s with CHANGES program staff ▪ IDIs with program staff of similar programs
Market Profile Analysis	
Examine whether the current program design and implementation approaches are sufficient to meet current client needs given the possible evolution of the target client segment since the program's launch.	▪ CHANGES tracking data analysis ▪ IDIs with CHANGES CBOs ▪ Geospatial analysis
Assesses whether program services or funding should be modified to better meet current client needs.	▪ Longitudinal analysis of CHANGES spending and tracking data ▪ Analysis of reimbursement levels adjusted for consumer price and wage inflation indexes ▪ IDIs with CHANGES CBOs and CHANGES program staff

1.3   KEY EVALUATION FINDINGS

Key evaluation findings and select program recommendations are presented here. They are discussed in more detail in Section 5 (Findings and Recommendations).

Benchmarking Findings and Recommendations

Benchmarking Findings

- **The CHANGES Program offers a unique, holistic approach to providing utility assistance to LEP customers.** No directly comparable offerings were identified that match all CHANGES Program characteristics.

Benchmarking Best Practices and Recommendations

- **Having adequate staff retention and training protocols** --> Ensure the CHANGES Program is appropriately funded, so that CBOs can adequately compensate staff
- **Leveraging community-based outreach**
- **Developing strategic partnerships** --> Encourage CHANGES CBOs to increase partnerships with outside organizations to facilitate incoming referrals
- **Ensuring organizational, systemic support** --> IOU liaisons should further support issue resolution
- **Utilizing technology to complement services rather than substitute** --> Explore and leverage digital platforms most used by the community
- **Using data to drive program improvements**
- **Implementing plain language standards** --> Review and update materials to comply with standards
- **Reducing stigma and normalizing conversations around assistance**

Market Profile Analysis Findings and Recommendations

Geographic Distribution and Service Gaps

- **Service levels vary within high LEP populated counties** --> Increases to CBO network should consider Riverside, Kern, and Contra Costa counties
- **Some counties with large LEP populations receive little to no CHANGES Program services** --> If the CHANGES Program expands service areas, consider adding CBOs in Tulare, Imperial, Merced, and/or King counties.
- **Some areas receive disproportionately higher levels of CHANGES Program services** (Madera county)

Funding Analysis

- **CHANGES Program annual funding has not kept up with inflation**
- **Most CBO reimbursement rates have not kept up with inflation**
- **CHANGES Program funding levels are insufficient to serve all customers in need**
- **CBOs report providing significant uncompensated work**
- **Increases in CBO case assistance reimbursement rates absent an increase in overall program funding resulted in decreased service capacity in PY 24/25**

--> CHANGES Program funding should be increased to account for inflation and unmet program demand (recommended increase to $2.6-$2.7 million per year)

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Market Profile Analysis Findings and Recommendations

Program Implementation

- The CHANGES Program is an important statewide resource for LEP utility assistance
- CHANGES Program administration by IILA and Milestone Consulting is comprehensive and resource intensive
- Most CBOs participate in all program areas, but volume of services provided varies by CBO
- Data systems limit program evaluability --> Continue improving program tracking database

Demographics of Clients Served

- CHANGES Program services are most often provided in Spanish, Cantonese, English, and Vietnamese
- Some languages that are commonly spoken by the California LEP population receive little to no CHANGES Program service --> Explore whether languages with low program case rates but high LEP populations are underserved or have less need
- The share of CHANGES Program cases conducted in English has remained relatively consistent since 2016
- Client demographics reflect an older and economically vulnerable population
- Almost all clients live in low-income households
- Increased immigration levels present service challenges --> Ensure only essential client information is collected
- Evolving CHANGES Program demographics require updated resources --> Explore creating new in-language materials and educational programming
- CHANGES Program clients face multiple barriers to seeking utility assistance independently

Services Provided to Targeted Clients

- Education events serve unique needs of CHANGES Program clients but are impacted by funding
- The value of education evaluation data is uncertain as it remains unanalyzed --> Clearly determine and document the goals and objectives of the education evaluations
- Word of mouth remains the most common way clients learn about the CHANGES Program
- Outreach activities have declined in recent program years due to funding limitations
- Case activity is dominated by payment difficulties and bill-reduction program assistance
- Some CHANGES Program clients attempt to resolve utility issues themselves first
- Instances of repeated services to the same client are frequent--> Work with CBOs to create additional materials that could assist clients with frequently recurring issues
- The CHANGES Program helps clients alleviate significant outstanding utility balances
- IOU assistance is limited and impacts CHANGES Program services --> Ensure CBO staff know how to report issues with IOU phone lines and IOU support
- IOU coordination is a challenge --> Ensure meeting agendas cover important topics such as IOU phone line accessibility, and IOU policy, program, and eligibility updates
- CBOs reported issues with printed materials request process, which hinders service --> Develop and ensure CBOs are aware of protocols for reporting/escalating issues with program materials

2　INTRODUCTION

2.1　PROGRAM OVERVIEW

The CHANGES Program has served Limited English Proficient (LEP) customers in California since 2011, providing individualized case management assistance, consumer education, and program outreach through a network of Community-Based Organizations (CBOs). The program helps participants navigate utility services, resolve billing disputes, and access financial assistance programs. The program's unique model leverages culturally competent CBOs to deliver services in multiple languages and provides holistic case management that addresses clients' natural gas and electricity utility service issues.

There are four areas of program focus:

Customer outreach which typically occurs via community events, such as street fairs or presentations, and in-language media placement, including print, radio, TV, and other social media platforms.

Customer education on CARE/FERA & other assistance programs, avoiding disconnection, selecting rate plans, utility safety & conservation, & understanding energy bills which are typically provided on CBO premises or nearby facilities.

Dispute resolution which helps customers if they believe their utility has made an error concerning their account or the services provided.

Needs assistance which can include helping customers make payments or understand their bill, requesting billing or financial support, and/or signing up for assistance programs.

The program is overseen by the California Public Utilities Commission (CPUC), managed by a primary implementer through a statewide network of participating CBOs. The program serves gas and electric customers across all major Investor-Owned Utility (IOU) service territories, Pacific Gas and Electric (PG&E), Southern California Edison (SCE), Southern California Gas (SCG), and San Diego Gas and Electric (SDG&E). The CHANGES Program began as a Pilot in 2011 and was authorized as an ongoing program in December 2015 (in D.15-12-047). The annual budget for this program has remained steady (around $1.7 million) since then and through PY 2026 (via D.21.06-015).

2.1.1 Evaluation Context

Four evaluations have been completed since the pilot launch, taking place in 2012, 2014, 2018, and 2023. The 2023 evaluation (Program Cycle 2019-2021) included an evaluability assessment, an assessment of program costs and benefits, and an analysis of spatiotemporal distribution. The evaluability assessment led to a recommendation that the implementer improve the completeness and quality of program tracking data. Under the assessment of program costs and benefits, the prior evaluation recommended that the next evaluation assess whether an increase in funding is warranted. It also included a recommendation to revisit the basis for the per unit cost established for case assistance by the implementer (payment was limited to one resolution per case, though on average they found 1.24 resolutions completed per case). The spatiotemporal distribution analysis found that program costs may not be fairly distributed across the IOUs, as indicated by the services provided in their territories (PG&E may have underpaid based on program activity, while the other IOUs may have overpaid). They also identified geographic regions that were underserved (LA County), or at risk of becoming underserved (the Central Valley), leading to the recommendation to re-evaluate CBO coverage and consider adding more CBOs in underserved areas.

2.2 RESEARCH OBJECTIVES AND QUESTIONS

The California Public Utilities Commission (CPUC) directed this evaluation in Decision 21-06-015, requiring the evaluation to "detail the benefits and cost-effectiveness of services delivered to (CHANGES) customers, including comparisons to similar initiatives nationwide".

The primary research objectives of this evaluation of the CHANGES Program are to conduct:

- A **Benchmarking Analysis** to compare CHANGES services and offerings to similar programs administered by other jurisdictions and/or the IOUs. Based on the results of the analysis, identify effective and unique services or approaches that the program should consider adopting. If similar IOU programs or services exist, make recommendations for streamlining services.

- A **Market Profile Analysis** to determine if the current program design and implementation approach is meeting client needs given the possible evolution of the target client segment since program launch and if a change in program funding is warranted considering recent program activity levels, services offered, and current funding levels (which have remained the same since PY 2016).

The table below presents the primary research questions for these two study objectives and the report location for the answers to each of the primary research questions.

TABLE 2-1: PRIMARY RESEARCH QUESTIONS, AND ACTIVITIES

Research Questions	Report Section
Benchmarking Analysis	
1. What programs are offered by the IOUs or within other jurisdictions that provide similar services to the population of customers served by CHANGES? Do the similar programs use any approaches or provide any services that should be adopted by the CHANGES Program?	Section 3.2
2. If present, what are the strengths and weaknesses of the overlapping IOU offerings and, how can similar services be streamlined to optimize customers' experiences and the use of ratepayer funds?	Section 3.2
3. How could the need for CHANGES services be mitigated by addressing customer issues when they first arise?	Section 4.4.3
Market Profile Analysis	
4. What are the demographics of the clientele currently served via the CHANGES CBO network?	Section 4.3
5. Is the program currently providing services to targeted customers that are not formally acknowledged?	Sections 4.4, 4.6
6. What are the core missions, customer demographics, locations served, and services offered by the CBOs supporting CHANGES?	Sections 4.2.2, 4.3, 4.4, 4.5
7. What are the core reasons customers are soliciting assistance from the CHANGES CBOs?	Section 4.4.3
8. Has the program evolved and shifted its focus from LEP customers to other populations which may warrant additional program services?	Section 4.3.1
9. Where (geographically) are program services being conducted and does the level of service address customer segment needs? Are all CBOs providing services in the four program areas of interest?	Section 4.2.2, 4.5.2
10. Are there any gaps in CBO service coverage (such as areas having high need but lacking access to services)?	Section 4.5.3
11. Is a change in program funding warranted considering: 1) PY 2022-2024 program activity and financial data and historical program data and trends (including clientele seeking services, program spending, and program service needs) 2) Wage and cost inflation and program changes since PY 2016?	Section 4.6

3   BENCHMARKING ANALYSIS

This section presents findings from our benchmarking analysis of the CHANGES Program. The benchmarking analysis focused on the identification and initial assessment of comparable offerings (including programs and services) and studies aimed at identifying effective methods to support LEP customers.

3.1   METHODOLOGY

Research into comparable offerings began with a nationwide search of utility programs to identify potentially similar programs in the utility space. Once this was completed, the team expanded our search to include other programs that aimed to provide services to LEP customers or other underserved customers. Verdant found that the healthcare industry had quite a few initiatives (including both programs and grants) geared towards assisting LEP communities. Verdant tracked comparable findings in a program comparison workbook, which served as the central repository for storing information on potentially similar programs and offerings. This workbook also stored contact information for individuals associated with each of the identified programs and offerings and was used to track interview outreach activities.

Our research included both literature reviews and structured interviews with program staff from selected programs. Literature reviews involved assessing available documentation of program or service goals, metrics, services offered, and recommendations to identify items that are relevant and may be beneficial to the CHANGES Program. Interviews gathered detailed information about program implementation, target populations, service delivery models, and performance outcomes.

We established several primary criteria for identifying similar offerings, recognizing the uniqueness of the CHANGES Program, and understanding that it is unlikely that any of these would match all CHANGES characteristics:

TABLE 3-1: CRITERIA TO IDENTIFY SIMILAR OFFERINGS

Characteristic	Criteria
Population Served	LEP, income-qualified, and/or other under-served communities
Service Provider	Program delivered through CBOs
Service Provided	Culturally competent, individualized, and holistic case assistance, education, and outreach

3.2 BENCHMARKING SERVICES COMPARISONS

3.2.1 Identification Process

Our literature review identified ten potential offerings for analysis. We applied our selection criteria systematically, evaluating each program or services' alignment with the CHANGES Program's core characteristics. We consulted with the CPUC study team to validate our initial offerings list and refined our selection to focus on offerings with the strongest similarities to CHANGES. As noted, we did not find any offerings that were wholly comparable to CHANGES, yet several offerings had key similarities in one or more areas.

3.2.2 Overview of Comparable Offerings

Table 3-2 highlights offerings Verdant selected for further research, with guidance from the CPUC. These offerings demonstrate significant alignment with the CHANGES Program's core characteristics, particularly in serving LEP populations via a network of CBOs or utilizing other culturally competent service delivery models. While we could not connect with all of the organizations on the list, our research indicates that these organizations may have valuable insight based on their experience implementing and administering their different services and offerings.

TABLE 3-2: SIMILAR OFFERINGS IDENTIFIED FOR FURTHER RESEARCH

Name	Jurisdiction	Description	Similarities
Citizens Utility Board (CUB)	Illinois	Hundreds of events a year including in person and virtual bill clinics. Toll free hotline for customers with questions or concerns about their utility services, rates, or other issues.	Assistance to utility customers; Community events
UGI Customer Assistance Program (CAP)	Pennsylvania	Personalized monthly payments based on income and average bills. Provides past due debt forgiveness.	Assistance to utility customers; Implemented by CBOs
Community Mental Health Equity Project	California	Grants for CBOs and Technical Assistance (TA) funds to contract consultants with cultural competence, health equity, language access, and stakeholder engagement experts to provide TA to counties on population-specific and community-driven approaches to reduce disparities.	Cultural competency, language access, and equity, and provides population and community driven approaches
Language Access and Cultural Competency (LACC)	California	Regional health centers receive funding to implement services such as: education & training workshops, interpretation & translation services, listening sessions & focus groups, partnering with CBOs.	Approaches include outreach events, interpretation and translation services, partnering with CBOs
Language Access and Cultural Responsiveness	Maryland	University of Maryland's Horowitz Center provides resources to help organizations enhance information and services for people with LEP.	Cultural barriers
CBO Arrears Case Management Pilot	California	Program to help residential customers in arrears pay off their existing utility debts and better manage their bills through personalized case management. Intended to serve customers who would otherwise continue to face difficulty resolving their utility bill debt.	Utility aid through personalized case management
Nuestras Voces Adelante	Nation-wide	Program focuses on tobacco and cancer prevention control for Hispanic population.	Culturally proficient services
Massachusetts LEP and English-Isolated Customer Journey Mapping and Barriers Study	Massachusetts	Residential language-focused journey mapping and barriers study to develop just and equitable solutions among historically underserved communities.	Language access and barriers; Underserved communities
Community Energy Engagement Project	New York	Works with CBOs to connect customers, supporting them in applying for assistance with energy efficiency projects.	Implemented by CBOs

3.2.3 Comparable Offerings Research Findings

The following section presents benchmarking findings. As noted previously, not all programs and services identified in the table above responded to requests for interviews. Six interviews were completed; one with the Illinois Citizens Utility Board, one with a CBO implementing UGI's CAP, another with two industry professionals from the University of Maryland discussing Language Access and Cultural Responsiveness, a key staff with the Community Energy Engagement Project, and a team member of a regional medical facility receiving LACC funding, and the final one with a CBO partnering with the regional medical facility implementing projects utilizing LACC funding. Interviews, however, were not the only method of gathering program benchmarks. Literature reviews of program documentation and reporting were also reviewed where available.

CITIZENS UTILITY BOARD (CUB)

Citizens Utility Board (CUB) was created by the Illinois General Assembly in 1983, with the purpose of advocating for and representing the interests of residential and small business utility customers. The organization staffs a hotline for Illinois customers to voice concerns, complaints, or ask questions about utility services. Their outreach team provides hundreds of free events every year, including bill clinics to help customers reduce their utility bills and educate them about utility programs, solar, and electrification options. They also have a bilingual team that operates CUB Español which provides the same services to the Spanish-speaking communities.

Our interview with CUB staff highlighted that their successful strategies center on their community partnerships. **Rather than organizing stand-alone events, CUB staff are typically invited by CBOs, local leaders, and elected officials to co-host and present at workshops and events**. These partnerships allow CUB to reach underserved communities more effectively, by providing services within existing community networks and leveraging trusted relationships.

The organization has found success **adapting their communication methods to match the community preferences**, specifically for their Spanish-speaking populations. CUB Español realized that while they were getting community engagement with their Facebook account, their X (formerly Twitter) account did not have much traffic. By replacing their X account with a WhatsApp phone number, they were able to dramatically increase customer engagement, as many Spanish-speaking members were comfortable using WhatsApp, resulting in significantly more service requests. Similarly, CUB created a hybrid approach of offering both virtual and in-person bill clinics, developed during COVID, which has expanded access by allowing consumers to receive personalized bill analysis regardless of geographic barriers.

Working with CBOs to embed services within existing networks can be more effective than creating standalone programs. Leveraging partnerships to expand outreach helps reduce organizational burdens while expanding outreach potential.

Tracking traffic from different communication methods helps to ensure community preferences are understood rather than assuming traditional channels work universally. Sustainable community engagement requires flexibility in service delivery models and responsiveness to changes in how targeted populations prefer to communicate and organize.

UGI CUSTOMER ASSISTANCE PROGRAM (CAP)

The UGI Customer Assistance Program (CAP)[1] is a utility assistance program focused on low-income individuals, offering a personalized monthly payment based on income and average bills, along with past-due debt forgiveness for those that qualify. While the program is offered by UGI Utilities, Inc. (a natural gas and electric utility that provides service to 700,000 customers in portions of Pennsylvania and Maryland), it works with CBOs to certify (and recertify) customers for the program. The program's website provides a list of 21 different CBOs, by geographic area, that provide support for different zip codes. We conducted an interview with one CBO that implements this program.

The main notable similarities to the CHANGES Program include that the program supports utility customers and that they work with CBOs to enroll customers. While the program is not specifically geared towards LEP customers, the CBO we spoke with noted that their community is seeing an increasingly larger Hispanic and Latino population, and that they have been adapting to this by hiring Spanish-speaking staff, providing bilingual materials, and creating culturally sensitive communication strategies.

During the interview, the CBO mentioned that the reimbursement they receive for implementing the program and adding customers is insufficient for the level of effort it takes. They said they are reimbursed for their work on a set dollar amount per verified enrollment basis, per recertification application, and per phone or mail contact, but that this isn't enough to support the fulltime staff needed to implement the program and thus their organization has considered cutting the program. However, it took reimagining the effort to make the program work out. Rather than trying to hire full time staff to support the program, they have shifted program support responsibilities to existing roles (their guest specialist and front desk staff).

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[1]   UGI's Customer Assistance Program (CAP). https://www.ugi.com/assistance-programs/CAP/. Accessed 2025-07-21.

While the CBO we spoke with indicated that their approach to enrollment is reactive (they rely on referrals from UGI and other sources), they emphasized the importance of staying connected with other community partners and partner agencies. For example, they coordinate with a local behavioral health program which utilizes case workers to ensure a family has access to counseling, has enough food, or can pay rent or utilities. If these case workers discover a family is behind on their utility bills, they can refer the family to the CBO for UGI CAP assistance. This allows the CBO to take referrals rather than spending the resources on outreach for the program, which they are not reimbursed for.

Coordinating and collaborating with other agencies who are already doing outreach in the communities helps lessen the CBO's outreach burden, while simultaneously allowing them to serve their target populations.

LANGUAGE ACCESS AND CULTURAL COMPETENCY

The California Welfare and Institutions Code Section 4620.4[2] awarded the Department of Developmental Services $16.7 million ongoing funding for regional centers to improve and promote the Language Access and Cultural Competency (LACC) Program, with the purpose of better supporting the language needs of individuals with developmental disabilities, their caregivers, and their family members. The goal is to improve access to services for individuals with developmental disabilities from diverse linguistic and cultural backgrounds, ensuring they can effectively engage with and benefit from regional center support. For the regional center we interviewed, their LACC funds went to increasing bilingual staff, providing translation services for documents and meetings, conducting community outreach, partnering with CBOs, and overcoming cultural stigma around developmental disabilities. Some of the findings from our interview with one of these regional centers and interview with one of the CBOs partnered with the regional center are highlighted below:

Providing help to underserved communities starts with understanding the barriers faced by families receiving that help. Some LACC funding went to listening sessions, public meetings, and community surveys to better understand the needs of, and help to build trust within the community. One issue that kept coming up was related to the stigma and shame associated with developmental disabilities in certain cultures, creating hesitancy in parents seeking the support they need for their children. The LACC funding helped to create media content, reflecting community members and helping to normalize conversations about developmental disabilities. But most importantly, this helped to meet communities where they are at, both physically and culturally. The LACC funding allowed outreach to be conducted at natural community gathering points, and providing support to families helps to empower and provide

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2   California Welfare and Institutions Code.
     https://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=WIC&sectionNum=4620.4.&artic le=1.&highlight=true&keyword=language%20access . Accessed 08/04/2025.

independence. The CBO we spoke with noted that their target community focuses on oral language, as their older generation often do not read or write but instead tell stories through their embroidery and their clothing. The CBO had to think outside of traditional outreach methods, and hosted a story cloth embroidery workshop, to help open discussions about mental health. Additionally, because of the low rates of education among the older generations, the CBO realized that even attempting to survey the community to better understand their needs had its own sets of challenges. They found that they often had to sit down next to someone to walk them through the survey, question by question, on the iPad or laptop, as many respondents couldn't follow or understand the surveys.

Addressing cultural competency begins with a leadership commitment. The regional center we spoke with noted the creation of a monthly diversity outreach working group that meets specifically to identify and pursue community engagement opportunities. They expand beyond surface-level translation by developing internal awareness campaigns that ensure every staff member, from service coordinators to executive leadership, understands the importance of cultural competency, not just providing translated materials, but truly understanding the cultural nuances that impact service delivery. This includes proactive translation of materials for languages spoken by a number of clients, public meetings automatically provided with Spanish and American Sign Language (ASL) translation, and outreach materials designed with cultural sensitivity in mind. Technology plays a supporting role in this strategy, with the center using website translation features, providing translation-enabled iPads in reception areas, and creating media content that reflects the diversity of their client base. Ultimately, a systemic approach is about more than just language access – it's about creating a culture of inclusivity, respect, and understanding that recognizes the unique needs and experiences of each client.

Speaking someone's language creates an immediate bond. The CBO we spoke with highlighted the fact that whatever the language, there is an immediate connection between people when they can speak with someone in their own language. While the CBO serves a specific immigrant community, they have found that they are becoming a trusted organization, even among other immigrant communities. While the ideal scenario would be to hire bilingual staff that speak many different languages, they wish they had funding for a language line to expand their one-on-one services beyond just their original targeted community.

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Utilities should sustain and expand culturally competent service delivery through dedicated leadership structures, ongoing community engagement, and proactive, nuanced language access strategies that go beyond translation to address cultural norms and barriers to participation.

Having staff on hand who not only speak the language, but also deeply understand the cultural nuances and are immersed in the culture helps to provide creative and personalized solutions that can significantly increase service utilization and community engagement.

LANGUAGE ACCESS AND CULTURAL RESPONSIVENESS

La Clinica del Pueblo, a federally qualified community health organization, provides medical interpreters for LEP patients to help patients navigate medical situations. Initially, their medical interpreters were only meant to facilitate communication during clinical visits. However, they found that interpreters were being asked to help patients navigate complex processes before and after medical appointments, which was outside their original job scope. La Clinica del Pueblo partnered with the Center for Health Literacy at the University of Maryland (UMD) to reimagine and potentially redefine the medical interpreter's role to better support patients, especially those with limited English proficiency.

Verdant interviewed two experts from UMD's Center for Health Literacy. These experts shared approaches that they employed supporting La Clinica del Pueblo that could possibly benefit the CHANGES Program. Their insight is shared below:

Breaking down seemingly simple tasks (such as paying bills), into multiple steps, and identifying where customers get stuck in the process helps identify pain points. While paying a bill may seem easy, there are many different aspects of paying your bill that a person must know about. They must know about their bill, recognize there is a due date, understand what form of payment is accepted, and know how to effectively make a payment using the selected form of payment. All these steps may seem like basic knowledge, but to someone who may not be able to read the language, these become much harder. Paying a bill is just one example of a relatively easy task where communication can break down during customer and utility interaction, but there are many other types of customer and utility interactions that could benefit from a similar approach to task breakdowns.

Using plain language makes communication more understandable for all users. Our interviewees highlighted the use of "plain language" as a tool when working with LEP communities. Plain language is described as "*grammatically correct and universally understood language that includes complete sentence structure and accurate word usage*" and includes "*common, everyday words, except for necessary technical terms... personal pronouns; the active voice; logical organization; and easy-to-read and*

understandable design features, such as bullets and tables".[3] As part of the California governor's executive order on equity, N-16-22,[4] California's Office of Data and Innovation has developed a California Plain Language Standard, which, presented as a webinar, highlights the principals of plain language, explains how it increases equity in service delivery and trust between people and organizations, and describes how to create products and services that align with California's plain language standard. The webinar also highlights how the use of plain language reduces the "tax time", or the extra time and effort people spend to get benefits and services.

Our interviewees also highlighted the importance of training staff in plain language techniques, as well as developing plain language checklists. They also mentioned that prioritizing vital documents to ensure compliance with plain language techniques would provide the highest benefits,

> ### Plain Language Example: Hazards of Flood Cleanup
> Before:
> "Flood conditions contribute to the growth and transmission of many kinds of fungi, some of which can cause sickness. Cleanup workers are at increased risk of exposure to airborne fungi and their spores because they often handle moldy building materials, decaying vegetable matter, rotting waste material, and other fungus-containing debris. The fungal material is carried into the respiratory tract when airborne particles are inhaled.
>
> After:
> Be careful when cleaning up after a flood. You may be exposed to and breathe in unhealthy mold in:
>
> - The air
> - Damp building materials
> - Decaying vegetable matter
> - Rotting waste material
> - Any other damp debris
>
> *Source: California Plain Language Standards webinar*

based on the documents that are most widely accessed. A final point they stressed was that the use of plain language is not about "dumbing down" the communication material, but instead making it more understandable for all users, using common terms instead of industry jargon, using simpler words and shorter sentence structures, and using icons and imagery whenever possible.

Finally, when probed about barriers to participation for LEP customers, our interviewees noted that the **largest barriers they currently encounter have to do with the current political climate**. Many from the LEP communities are reluctant to make themselves visible, as they are worried about immigration status being called into question because they don't speak English. They are also worried about the privacy of their personal information that often has to be provided through these programs to access the desired services, as they worry their data may be misused.

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[3] U.S. Office of Personnel Management. *Plain Language.* https://www.opm.gov/information-management/plain-language/. Accessed 2025-07-23.

[4] Executive Department, State of California. Executive Order N-16-22. https://www.gov.ca.gov/wp-content/uploads/2022/09/9.13.22-EO-N-16-22-Equity.pdf. Accessed 2025-07-24.

Communication is key. Presenting information in an accessible format and intentional translation that does not rely on tools such as Google translate are pivotal for ensuring information is being shared in supportive and understandable ways.

> *Key takeaways from our discussion with the experts from UMD centered around 1) ensuring clear and accessible communication and 2) fear as a barrier to LEP customers receiving the support they need. Both highlight the critical importance of CBOs, who often hold more trust from the community than utilities, in providing services to LEP customers.*

COMMUNITY-BASED ORGANIZATION ARREARS CASE MANAGEMENT PILOT

The Community-Based Organization Arrears Case Management Pilot program (CBO Pilot) was established in California based on D.33-04-037, which noted it was … "necessary due to the utility bill debt crisis in California that predated the COVID 19 pandemic and has only been exacerbated by it", and that "the CBO Pilot is intended to serve customers who would otherwise continue to face difficulty in resolving their utility bill debt once the statewide relief distributed to utilities [from the California Arrearage Payment Program] is applied to customer accounts." The goal of the program is to help residential customers in arrears pay off their existing utility debts and better manage their utility bills going forward.

The CBO Pilot has many similarities to the CHANGES Program. Most notably, it is implemented by CBOs with the goal of assisting utility customers. Both programs are designed to provide customers with personalized case management to support difficulties with paying monthly utility bills and energy education to help promote long-term utility bill resiliency. While CHANGES has a broader area of utility bill support than the arrearage-focused CBO Pilot, both endeavors employ similar strategies such as utilizing payments from Low Income Home Energy Assistance Program (LIHEAP), educating and/or signing up customers for programs that can lower energy bills, and supporting customers negotiating payment plans with their utilities.

While the evaluation of the CBO Pilot has not yet been completed, Verdant is able to use our insights as the embedded evaluator to share findings from this program for the benchmarking analysis.

- **CBO Pilot Funding**: The CBO Pilot is funded through the COVID-19 Pandemic Protection Memorandum Account (CPPMA) established through rate payer funds.[5] The pilot budget was set at $11.2 million with $8.5 million set aside for arrearage case management and CBO services to 12,000 identified eligible customers for two years (4,800 in PG&E territory, 4,800 in SCE and SoCalGas territory, and 2,400 in SDG&E territory). Each CBO was provided with an upfront grant to set up their pilot implementation activities and then are paid $50/hour for providing Pilot services to customers. To

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5   CPUC decision D.22-04-037.

track CBOs Pilot performance, metrics such as monthly staff hours and customers enrolled or provided with case management services are tracked and delivered monthly to the respective IOU project manager and evaluation team.

- **Case Management Services Offered:** The personalized case management services provided to customers through the CBO Pilot are defined differently for each participating CBO. Current approaches range from emailing enrolled Pilot participants a list of programs they are eligible for, to requiring participants to attend a 35-minute in-person energy education workshop. Common practices include assisting customers with LIHEAP payments, signing customers up or directing them to sign up for California Alternate Rates for Energy (CARE) or Family Electric Rate Assistance (FERA) or payment plans (like the Arrearage Management Program), and connecting customers with other resources that the CBOs provide (e.g., holistic care through food insecurity support, childcare, job support, etc.).

We have identified several promising practices that appear to support effective enrollment and case management within the CBO pilot:

- A single point of contact or dedicated liaison from the IOU that serves as the primary contact point for CBOs, providing direct access to a specified utility team that can assist with customer case management tasks such as enrollment in a payment plan or addressing disconnection resolution.

- Regular collaborative meetings among participating CBOs to facilitate the exchange of case management strategies and best practices for supporting pilot participants.

A dedicated liaison from the IOU to serve as a single point of contact for CBOs improves accessibility and reduces the time it takes for LEP customers to receive assistance. Regular collaborative meetings between CBOs help facilitate ideas and best practices to support LEP customers.

MASSACHUSETTS LIMITED ENGLISH PROFICIENT AND ENGLISH-ISOLATED CUSTOMER JOURNEY MAPPING AND BARRIERS STUDY

A residential language-focused journey mapping and barriers study was commissioned by Massachusetts stakeholders as part of their 2022-2024 Three Year Plan objectives to develop just and equitable solutions among historically underserved communities. While this study was not a program or service offering, the study identified participation barriers and challenges, and developed findings and recommendations related to providing access to LEP customers.

The study highlighted two major points that exacerbated **barriers to participation: trust and knowledge**.

Trust concerns are related to some customers not wanting to provide information that the program requires, especially when there might be fine print that they may not understand. Customers were concerned that their information was not protected or kept confidential, or that sharing the information would result in undesirable and unintended consequences, such as being flagged in a system for investigation.

The report noted that customers that have experienced enrollment challenges in the past often require more information to motivate them into participation, and that many LEP customers rely heavily on word-of-mouth referrals. The report recommended that prioritizing efforts to improve customer service experience for LEP customers would result in higher word-of-mouth referrals, and that partnering with community liaisons (such as non-profit organizations that offer immigration or ESL services or faith-based organizations) would result in increased awareness and improved enrollment support and case management.

Knowledge concerns are related to LEP customers finding marketing materials difficult to understand, even when translated, and that customers also did not understand technical term translations, despite best efforts to translate or explain complex terminology. The study recommended developing additional staff reference sheets, customer handouts, and other materials with sufficient visuals to support conversations where language may be a barrier. Additionally, the study noted that identifying specific processes to gather data and feedback from LEP customers would be useful.

Finally, the study included a LEP customer experience summary panel, which highlighted different positive experiences, pivotal points, pain points, and dropout points, as determined through interviews with participants and non-participants.

FIGURE 3-1: LEP CUSTOMER EXPERIENCE SUMMARY PANEL[6]

KEY
◯ Positive program experiences
◯ Pivotal points
◯ Pain points
◯ Drop-out points

Summary Panel

Limited English Proficiency (LEP) Residential Customer Journey Map (Historical)

01.	Previous positive program experience fosters interest in future participation
02.	Community liaisons offer familiar faces & spaces that customers trust
03.	Professional contractors drive participation
04.	Word-of-mouth referrals drive participation
05.	Nonparticipants were interested in programs after we explained them in-language
06.	Translation hotlines ease communication
07.	Community liaisons engage successfully using WhatsApp & WeMeet
08.	LEP customers worry inaccurate translation will lead to inaccurate understanding
09.	LEP customers want opportunities to provide feedback
10.	Program staff lack info about customer language preferences
11.	Bi-/multilingual HPCs stretch their time to help LEP customers
12.	Some LEP customers are moved through enrollment unknowingly
13.	Marketing messages not in preferred languages do not raise awareness
14.	LEP customers associate fine print on forms & reports with scams
15.	HEA reports & forms, only offered in English, limit understanding
16.	LEP customers did not understand program offerings & suggested in-language videos to explain them
17.	LEP customers did not understand technical term translations during assessments
18.	LEP customers struggle to find in-language contractors
19.	LEP customers were unable to communicate with HPCs
20.	Non-English phone contact at any phase takes more time & is more confusing than English
21.	Translated web pages are inaccurate & difficult for LEP customers to comprehend
22.	Using the translation hotline makes HEAs longer
23.	LEP customer confidentiality concerns are a participation barrier
24.	LEP customers miss vital info in ads, emails, MassSave.com, etc. to understand programs
25.	LEP customers are inadvertently forced to vie for limited bi-/multilingual staff time
26.	Some LEP customers end contact if the initial response is in English
27.	Limited translation hotline dialects halt participation
28.	Translated web pages lack content & in-language resources

Utility programs should work with trusted community groups like churches and immigration organizations to help customers feel safe sharing their information. Program materials should use simple words and pictures instead of hard-to-understand technical terms. Utility programs should examine the steps required for (even simple) tasks to identify what does and doesn't work and where participation dropouts occur.

COMMUNITY ENERGY ENGAGEMENT PROJECT

The New York State Energy Research and Development Authority's (NYSERDA) Community Energy Engagement Program (CEEP) provided educational awareness and hands-on support to help residents, small businesses, nonprofits, and multifamily building owners—especially in low-to-moderate-income communities—take clean energy actions. The program was delivered through trusted CBOs, offering workshops and individualized assistance, and helping participants understand their energy consumption, calculate potential savings, and navigate application processes for clean energy programs and incentives. While the CEEP did not provide direct financial incentives, it connected stakeholders to available resources and funding, using a "whole house" approach that considered comprehensive efficiency and renewable

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[6] Guidehouse. *Massachusetts Limited English Proficient and English Isolated Customer Journey Mapping and Barriers Study.* MA21R37-B-LEPJM. October 23th, 2023.

energy opportunities. While the program did not focus specifically on LEP customers, the program prioritized working with CBOs with bilingual staff, and some material was developed in both English and Spanish. However, it was generally up to the community organizations to develop bilingual materials in the languages they needed, while NYSERDA provided design support and branding guidelines.

The main similarity between the CEEP and CHANGES Program is the program delivery by CBOs. The contact we spoke with mentioned that one of the large challenges that the CEEP faced was related to information sharing between utilities and CBOs. Although the utilities have customer data, sharing it with CBOs was often difficult due to privacy concerns, and there was no comprehensive framework that existed for the sharing of data to occur. In some cases, distinct agreements had to be put into place between the utility and the CBOs. Other cases involved legal teams to ensure data privacy was secured, and it took significant effort to build out the privacy and security infrastructure detailing how information would be shared and secured to ensure there were no lapses in information. Program staff reported that systematic changes would have been more effective at the regulatory level, rather than trying to solve the issue on a program-by-program basis, which required extensive negotiations and infrastructure development for each individual effort.

Our interview with CEEP aligned with findings from CEEP's evaluation report, which indicated confusion amongst both the CBO teams and customers about NYSERDA programs. Confusion stemmed from program design aspects that were laborious or duplicative, and convoluted application processes. These issues were exacerbated by CBO staff turnover which resulted in a loss of knowledge. This highlights a need to develop robust infrastructure that provides consistent, up-to-date program and utility materials and ongoing training for third party implementers (like CBOs). This infrastructure could be provided by utility partners and should emphasize strong communication channels between utilities and the CBOs to ensure information is shared efficiently to increase the program's effectiveness. Utilities should establish clear channels for CBOs to ask questions, seek clarification on program details, and share insights about market challenges and utility access. By maintaining open and dynamic communications, utility staff can quickly adapt to emerging needs, address potential barriers, and ensure that CBOs have the most current information to effectively support community members in accessing utility programs and support. The ultimate goal is to create a flexible, responsive support system that empowers CBOs with the knowledge and tools they need to successfully guide residents and businesses through complex energy program landscapes.

Establish a standardized process for secure utility–CBO data sharing, and develop an ongoing, centralized training and communication system for CBOs to ensure consistent program knowledge across changes in CBO staffing. This streamlines processes, reduces barriers, and strengthens CBO capacity to provide support to community members.

3.2.4   IOU Language Translation Services

As part of our benchmarking analysis, Verdant also investigated potentially similar programs or services that were offered by the IOUs. One such offering that came up in the prior CHANGES evaluation was the IOU's translation services which provides basic language and translation access.

While the language translation services assist with interpretation, there are services they do not offer, such as comprehensive case management, cultural competency, and the community-based delivery model that characterizes CHANGES. Additionally, we learned through our interviews with CBOs, that many CHANGES clients do not see utilities as a trusted organization. Language interpretation, while valuable, represents a narrow service scope compared to CHANGES' holistic approach. A key offering of the CHANGES Program is cultural sensitivity. For example, first-generation immigrants are especially keen to utilize CHANGES services as LEP clients report feeling more comfortable talking to members of their own community. This cultural connection is something a language line cannot provide. During interviews with the CBOs, we heard that IOU translators often do not know how to speak the correct dialect, or do not have the technical vocabulary necessary to adequately explain concepts to clients. With these findings in mind, we do not consider IOU translation services as duplicative to the CHANGES Program.

3.3   BENCHMARKING CONCLUSIONS

The findings from our literature review, interviews, and other research establishes CHANGES as a unique program in the utility landscape, combining comprehensive case management, cultural competence, and CBO delivery in ways not found in other jurisdictions. Our research has identified several different findings and best practices for both utilities and program administrators that can help to improve community trust, increase program participation, and ultimately provide greater support to customers.

Language access relies on adequate staff training and retention. Organizations, such as utility companies, that serve a wide range of diverse communities often encounter cultural and language barriers. Without intentional strategies to address these barriers, and bilingual and bicultural staff to serve these communities, community members are often unable to access resources, programs, or services, reducing engagement, trust, and participation. While translation services are a key part of providing access, these services alone require that the community members are even aware of where to get the translated information they need.

This is the core feature of the CHANGES Program. Developing and implementing a comprehensive cultural competency strategy that goes beyond translation, incorporating community-informed outreach, staff training, and inclusive program design. This includes prioritizing recruitment, training, and retention of multilingual staff—especially in languages most common within target communities. Possible benefits for

these staff could also include career development pathways to retain these employees and formalize translation and interpretation protocols to ensure consistent quality across channels.

Meet the community where they are. Effective outreach is more than directing people to a website. It begins with meeting people in their own communities, where they naturally gather, physically, culturally, and technologically. Partnerships with community organizations and leaders are essential, finding local gathering spaces to host events, provide information, and deliver services in familiar and accessible settings. Accessible venues help to reduce barriers and install a greater amount of trust and credibility. This not only provides a feeling of safety but also signals respect, which can lead to stronger relationships and a greater uptake of services. It can also help to lessen the organizational burdens associated with planning events, as trusted community organizations are likely aware of spaces, venues, and events that are frequently visited by community members in need. Additionally, ensuring that communication methods are provided in the languages and format community members are most familiar with and typically utilize is essential in maximizing the outreach potential.

Create organizational, systematic support. Strong programs come from strong systems and strong systems are built through cross-collaboration. When third-party implementers (like CBOs) conduct outreach or provide services for larger organizations (like utilities), clear lines of communication are critical to ensure that program delivery is done in the most efficient and supportive manner possible. A good practice for this is to have utility companies establish a specific point of contact to work with CBOs. This not only ensures quick answering of questions that CBOs might have about utility programs or offerings but provides an avenue to more quickly and effectively help the community being served when issues arise. Equally important is a communication line that allows CBOs to provide feedback to utilities about their customers' experience. Having a feedback loop can help utilities better understand and address issues their customers' face, potentially reducing the volume of customer needs assistance requests. Finally, third-party implementers and program administrators must also have sufficient support regarding data access and sharing. Establishing clear protocols for secure data transfers, including development of NDAs, data-sharing agreements, and privacy protections, may require extensive coordination between utilities and CBOs, sometimes involving legal teams to develop necessary safeguards. Utility program managers should ensure they have a method in place ahead of time to address what data can and cannot be shared, the steps that need to be taken in order to share sensitive information, and the method of file transfers to avoid delays and ensure CBOs are able to effectively reach and serve their communities and utility customers.

Technology offers benefits that are often underutilized. As discussed above, successful community outreach often goes beyond website and document translations. Examples such as human-centric video messaging, social media campaigns on platforms frequented by targeted communities, and translation-enabled devices, can extend reach and streamline customer support. However, technology alone cannot

replace personalized interaction or address deep-rooted trust gaps. Utilizing technology as a tool to complement human-centered engagement and pairing digital platforms with community-based, on the ground outreach, can extend the reach of the program and the customer's served, but the technology must also fit with tools that would be utilized by the specific community that is being targeted. Identifying the most utilized social media platform(s) of the community or identifying the preferred method(s) of communication are important and may vary even within the community, sometimes by age ranges.

Collect data and develop feedback loops for continuous improvements. Participation and services received are not always analyzed by demographics, language, or cultural group. Many organizations lack a process to identify what services different community groups actually need—or the barriers that prevent them from accessing those services. When organizations don't disaggregate analyses focused on outreach, barriers, or service needs to language or cultural groups, they miss opportunities to identify disparities in who is being reached and served.

This work can be done through the use of surveys (in multiple languages), outreach (both leveraging other CBO partnerships and at important community spaces), and public listening sessions (either in focused groups or while doing culturally relevant activities) will help understand the needs, preferences, and service gaps experienced by different communities.

One-on-one engagement in someone's native language is invaluable. While there are many tools out there that can and should be used, one-on-one engagement remains the most valuable tool. Having an organization with staff that has the patience, linguistic and cultural competence, and willingness to walk clients through complex processes step-by-step builds trust and provides key support for individuals that struggle to navigate systems not built for them independently.

4   MARKET PROFILE ANALYSIS

This section presents findings from the Market Profile Analysis research conducted as part of this evaluation.

4.1   METHODOLOGY

This section presents the results of in-depth analysis conducted by Verdant of the implementation of the CHANGES Program to assess Market Profile Analysis research questions. Our analysis leveraged CBO interview findings, program tracking data analysis, and granular geospatial analysis combined with census data to provide a detailed map of services offered. Questions regarding the adequacy of funding were determined through a review of program financial data, annual reports, and previous evaluation reports.

4.1.1   Research Activities

The Market Profile Analysis relied on several research activities to address the study's primary questions. Each activity is described in more detail below.

- **In-Depth Interviews with CBOs:** Verdant conducted in-depth phone interviews with 15 of the 25 CBOs who were part of the statewide network implementing the program in Program Year (PY) 23/24. Four additional CBOs completed a web-survey version of the interview. These interviews sought to gather data from participating CBOs regarding the approaches they used to provide CHANGES services (e.g., outreach strategies, case management specifics, educational offerings, etc.) and ask questions to better understand how these services, and the demographics of their clients, have changed over time.

  - **CBO Annual Training**: Verdant also attended one day of the CBO week-long training that takes place each year, to build relationships with CBOs and facilitate communication pathways to aid the interview process.

- **CHANGES Program Tracking Data Analysis**: Verdant conducted a comprehensive review of the CHANGES Program tracking data (case entry data, approved education workshops, approved outreach

events, and approved media placements) from calendar years 2016-2024 to assess trends in needs, demographics, and services offered over time. [7]

- **CHANGES Program Material Reviews:** Verdant reviewed CHANGES Program materials, including educational fact sheets, training materials shared with the CBOs, and quarterly and annual reports.

- **Geospatial Analysis:** Verdant's geospatial analysis assessed where CHANGES CBOs currently provide services, where gaps occur, and whether program services should be modified to better meet the current landscape of LEP customers. This analysis leveraged data collected during the in-depth interviews with CBOs and the program tracking data, and also utilized the following data elements:

  - **US Census Bureau's American Communities Survey:** Geographic distribution of languages spoken by limited-English Speakers over time.

  - **US Department of Energy's Low-Income Energy Affordability Data (LEAD) Tool**: Provides detailed energy burden estimates at the census tract level.

- **Historical Program Review and Funding Assessment:** Verdant conducted a comprehensive assessment of program activities and financial data for PY 21/22 through PY 23/24, historical program data and trends, and cost and labor inflation indices to assess whether a change in program funding is warranted.

  - **CHANGES Contract Reviews**: Verdant reviewed CHANGES contracts between the CPUC and the prime contractor (Self-Help for the Elderly (SHE) and International Institute of Los Angeles (IILA)) to gather information regarding program budgets and roles and responsibilities. The SHE contract covered PY 19/20 through PY 23/24. The IILA contract covers a period which includes PY 24/25.

  - **CHANGES Invoice Reviews:** Verdant reviewed all CHANGES invoices sent by the prime contractor to the CPUC for calendar years 2022 through 2024. Verdant also reviewed the invoice sent at the end of PY 24/25. These invoices were reviewed to assess CBOs spending patterns and budget utilization during this period. Longitudinal analysis.

  - **Consumer Price Index and Wage Indices:** The California Employment Development Department (CA EDD) tracks the historical Consumer Price Index (CPI) and the Mean Annual Wage in California (as reported by the Occupational Employment and Wage Statistics program). Both were used to measure inflation over time from 2016 to present day.

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[7] The case data was limited to cases dated between 2016 and 2024, with cases classified as "disallowed" removed from analysis. A small number of "test" cases that did not pertain to actual case work were also removed. The customer ZIP code, ethnicity, language, and household size data fields were cleaned and/or normalized, as these fields had a number of formatting issues likely resulting from manual entry. Case resolution types and descriptions were also normalized across years to better align with the categorizations from the more recent years. Minimal cleaning was required on the outreach and education data sets.

4.1.2   Tracking Data Limitations

Research for the Market Profile Analysis was limited by the data available at the time of the study. The prior study[8] made several recommendations for improvements to the program tracking data, including: 1) Establishing a unique client identifier, and 2) Allowing users to enter secondary resolutions. While many other updates have been made to the program tracking data, these two recommendations were not implemented at the time of our evaluation. It is our understanding that these changes were not made because of budgetary restrictions. Due to the tracking data limitations, we could not answer questions related to the number of times a client interacts with the program, the types of repeated services provided, or the number of cases that require more than one resolution type.

4.2   PROGRAM IMPLEMENTATION

The CPUC oversees the CHANGES Program, which is currently managed by the prime contract holder, the International Institute of Los Angeles (IILA), with support from Milestone Consulting and delivered through a statewide network of CBOs.

This section presents an overview of the CBOs that are currently providing CHANGES Program services and provides each organization's core mission, target demographic, region and languages served, and a summary of the types of CHANGES services they provided in calendar years 2022 through 2024.

4.2.1   International Institute of Los Angeles and Milestone Consulting

CHANGES Program implementation is managed by IILA, a CBO located in Los Angeles whose goal is to provide "transformative services to refugees, immigrants, and working families by promoting self-sufficiency." IILA assumed management of the CHANGES Program implementation at the beginning of program year 2024/2025 (PY 24/25) and is supported in its role within the program by Milestone Consulting (who has been supporting the program since its pilot stages).

IILA and Milestone Consulting's involvement and responsibilities for CHANGES Program implementation are extensive and include items such as:

▪ **Program Planning and Management:** IILA and Milestone Consulting are responsible for the majority of program planning and management and leverage their program development experience and program delivery expertise.

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[8]   CHANGES Program Process Evaluation Study (2019-2021), Opinion Dynamics.

- **Reviewing and processing CBO invoices and re-allocating budgets**: IILA is primarily responsible for reviewing and processing the monthly invoices for all CBOs (which includes verifying invoices against the tracking database) and works closely with Milestone Consulting to re-allocate the program budget across CBOs based on CBO need and spending to date. The CBOs operate as a singular team implementing the program across the state and are willing to reallocate some of their funding to other CBOs if their needs are lower than others. The budget reallocation also includes moving funds from one service type to another (e.g., the outreach and education budgets are often reallocated to case assistance, as this is seen as the core CHANGES Program offering).

- **Managing and maintaining the CHANGES Program tracking database:** IILA is responsible for ensuring the database is up-to-date and user-friendly, implementing both small and large upgrades (such as adding new features or migrating servers), and making sure the database meets the needs of all users—including IILA, Milestone Consulting, CBOs, and the CPUC. IILA also ensures compliance and implements changes or improvements as requested by the CPUC or as needed for program operations. Regular updates and enhancements are made to support accurate invoicing, reporting, and overall program management.

- **CBO Education, Training, and Case Management Support:** IILA and Milestone Consulting provide extensive education and support to the CBOs participating in the CHANGES Program as part of their administrative duties. This includes an annual four-day training event, as well as ongoing technical support and coaching. As each IOU and each program offered has unique eligibility criteria, Milestone Consulting's institutional knowledge and IILA's support is invaluable to assisting CBOs navigate complex assistance program eligibility criteria and/or participation rules and providing services to clients with difficult cases.

- **Serving as a liaison between the CPUC staff and the CBOs:** IILA meets with CPUC staff monthly to discuss program implementation issues and status and serves as a liaison to transfer information between the CPUC and the CBOs that provide CHANGES services to clients across the state.

- **Program Performance Tracking and Reporting:** Database management and reporting are integral parts of program implementation and allow for metrics assessment and evaluation of program actions. As the CHANGES Program is a statewide effort that spans numerous different CBOs, it is no small feat to manage and validate data entry. Likewise, program tracking and reporting is a necessary aspect to understand programmatic status (including mediating the need for budget reallocation). As part of this process, IILA and Milestone Consulting track CBO performance and conduct some on-site monitoring. IILA and Milestone Consulting also develop quarterly and annual reports on CHANGES Program activities, which include detailed summaries of case assistance, education, and outreach activities and trends analysis. Note that the CHANGES Program does not have pre-defined success metrics or key performance indicators (KPIs) against which the program or CBOs are measured.

4.2.2 Statewide Network of CBOs

There are currently 24 CBOs providing CHANGES Program services to a diverse range of clients throughout the state. Each CBO has a unique mission and approach to serving its community. Table 4-1 below presents each CBO's mission, target demographic, and region served.

TABLE 4-1: SUMMARY OF MISSIONS, DEMOGRAPHICS, AND SERVICE AREAS OF ACTIVE CHANGES CBOS

CBO	Mission	Target Demographic	Region Served
Afghan Coalition	Empower Afghan refugees and immigrants in Northern California by providing comprehensive support services that foster integration, self-sufficiency, and community well-being. Uplift the community through education, advocacy, and collaboration, to ensure everyone has the opportunity to thrive and contribute to society while preserving their cultural heritage.	Afghan Community	Fremont
Alliance for African Assistance	To uplift refugees, immigrants, and the most vulnerable among us. We strive to help them become self-sufficient, thriving community members.	African Refugees	San Diego
Armenian Relief Society	Serve the social, health and welfare needs of the community, promote Armenian language and culture, provide financial assistance to students, assist victims of natural disasters and wars, foster the spirit of good fellowship in the community, and advocate for human rights and social change.	Armenian Community	Across California
Asian Community Center Senior Services	Promote the general welfare and enhance the quality of life for the community by identifying, developing, and providing culturally sensitive health and social services for older adults.	Asian Seniors	Sacramento
Asian American Resource Center	Improve educational, mental and physical health and well-being by providing informational and developmental programs to Asian Americans and other ethnic groups who are low-income, isolated, vulnerable and underserved throughout San Bernardino and Riverside Counties.	Asian Americans	San Bernardino and Riverside Counties
Asian Pacific Self-Development & Residential Association	Foster a safe, positive, and self-sufficient Southeast Asian community by providing affordable housing and essential services including food, education, healthcare, and job development, along with community organizing and leadership for deportation defense and youth development.	Southeast Asian Community	Stockton
Asian Youth Center	Help youth and families "overcome barriers to success" by providing a range of supportive programs and services. Originally founded to address the needs of Asian immigrant youth and families but has since expanded its service to all ethnicities in LA.	Mandarin, Cantonese, Vietnamese, Spanish, English	Los Angeles

CBO	Mission	Target Demographic	Region Served
Centro La Familia	Empower low-income families and individuals in Fresno County by helping them access life-sustaining resources. It provides culturally sensitive programs that promote health, wellness, and economic stability through education, training, and advocacy.	Spanish and English	Fresno
Chinatown Service Center	Provide services and advocacy to improve the quality of life and promote equal opportunity for immigrants and other communities.	Asian Pacific Islander Communities and immigrants	Los Angeles
Chinese Newcomers Service Center	Transform the lives of underserved communities by providing social, economic, workforce, and business services.	Chinese Immigrants	San Francisco Bay Area
The Compass of Madera	Provides services to Madera-area households related to food distribution (to help address food insecurity), tax preparation (to help navigate the tax system), and utility bill assistance (through TEAM and CHANGES).	Mexican, Hindu, Filipino, Chinese, and Pakistani, Communities	Madera County
Delhi Center	Advance self-sufficiency through offering programs in health, financial stability, education, and community engagement.	Delhi Neighborhood	Southern California
El Concilio of San Mateo County	Increase education, employment, and access to quality-of-life services for underserved communities and provide culturally and linguistically appropriate support to immigrant families, promotes health and social well-being, and empowers communities through leadership development and collaborative initiatives.	Spanish speakers	San Mateo County
International Institute of Los Angeles	Provide transformative services to refugees, immigrants, and working families to promote their self-sufficiency, strengthen their resilience, and honor their cultural identities.	Refugees, immigrants, survivors of trafficking, and families	Southern California
Korean American Community Services	Improve the quality of life for Korean Americans by increasing access to essential services, fostering community involvement and civic engagement, and promoting cultural heritage.	Korean American Community	Santa Clara County
Koreatown Youth and Community Center	Help low-income, multiethnic, and recently immigrated families and individuals in Koreatown realize their full social and economic potential by providing essential programs and services in education, mental health, family support, housing, and finances.	Korean immigrants, disadvantaged youth and families	Koreatown of Los Angeles

CBO	Mission	Target Demographic	Region Served
Little Tokyo Service Center	Provide social welfare and community development services to assist low-income individuals and other persons in need, contribute to community revitalization and cultural preservation in Little Tokyo and among the broader Japanese community in the Southland, and provide resources to neighboring Asian Pacific Islander or other low-income communities.	Japanese and Asian Pacific Islander Communities	Los Angeles
Madera Coalition for Community Justice	Educate and assist low-income residents of Madera County by working together to obtain appropriate and sufficient food, clothing, health care, educational and employment opportunities and other fundamental needs.	Spanish speaking low-income farm working communities	Madera
Pilipino Workers Center of Southern California	Build collective power within low-wage and immigrant Pilipinx communities to demand better living and working conditions in order to secure the dignity, safety, and economic stability of the Pilipinx community.	Pilipinx community	Southern California
Portuguese Community Center	Serves the diverse needs of migrant populations by helping community members overcome language, cultural, and financial barriers and by serving as a bridge to available resources and through direct services promoting health, well-being, and independence.	Immigrant Populations	San Jose
Southeast Asian Community Center	To support self-sufficiency, economic viability, advocacy, community empowerment, leadership development, acculturation, and cultural preservation within their communities.	Southeast Asian Community	Bay Area
Southland Integrated Services, Inc	Improve the well-being of Orange County's diverse population through outreach, education, and community health services.	Seniors with limited income and language barriers	Orange County
Suscol Intertribal Council	Seeks to bring healing between the existing population and the people who historically inhabited Napa Valley and nearby counties.	Indigenous Napa Valley Community	Napa Valley and nearby counties
The Fresno Center	Assist individuals in becoming self-sufficient, self-fulfilled and more productive members of the community while Fostering Cultural Preservation and Promoting Cross Cultural Understanding.	Immigrant, refugee, and underserved communities	Fresno County

In addition to the 24 currently active CBOs, there are four additional CBOs that were active in calendar years 2022, 2023, or 2024 but have since left the program (SHE, Centro La Familia, Good Samaritan Family Resource Center, and Central California Legal Service). In 2022-2024, these 28 CBOs provided services in 37 different languages. It should be noted that a core strength of the CHANGES Program, and what makes it truly unique from other programs, is the breadth and depth of cultural and language offerings it provides. The CHANGES Program truly shines in its ability to reach and support underserved communities.

Table 4-2 below provides, for each CBO, the number of CHANGES cases they served over the three-year period, the number of languages their services were provided in, and the top languages that 90% or more of their cases were served in. For example, this table shows that the Asian American Resource Center provided services in a significant number of languages (15), but most of their cases (94%) were provided in only three languages (English – 60%, Spanish – 21%, and Vietnamese – 13%). This table also demonstrates that most CBOs (22 out of 28) provide 90% or more of their services in only one or two languages. Notably, there were 14 CBOs for which English was one of the top languages in which they provided their case assistance services.

TABLE 4-2: PRIMARY LANGUAGES OF CASES SERVED BY CBO, 2022-2024

CBO	Number of Cases	Languages Served*	Top Languages** (% of Cases, up to 90%)
Afghan Coalition	604	6	Dari (88%), Pashto (9%)
Alliance for African Assistance	712	15	Dari (47%), Arabic (20%), Pashto (18%), Spanish (5%), English (3%)
Armenian Relief Society	928	2	Armenian (100%)
Asian Community Center Senior Services	224	11	English (49%), Cantonese (38%), Mien (4%), Farsi (3%)
Asian Pacific Self-Development & Res. Assoc	92	3	Khmer (92%)
Asian Youth Center	128	3	Cantonese (48%), Mandarin (45%)
Asian American Resource Center	1,454	15	English (60%), Spanish (21%), Vietnamese (13%)
Casa Familiar	571	2	Spanish (84%), English (16%)
Central California Legal Service***	28	3	Spanish (89%), English (7%)
Centro La Familia***	953	3	Spanish (75%), English (25%)
Chinatown Service Center	1,091	8	Cantonese (50%), English (38%), Mandarin (8%)
Chinese Newcomers Service Center	1,184	3	Cantonese (99%)
Compass of Madera	134	2	Spanish (87%), English (13%)
Delhi Center	608	4	Spanish (93%)
El Concilio of San Mateo County	1,454	4	Spanish (87%), English (13%)
Good Samaritan Family Resource Center***	287	6	Khmer (82%), Laotian (10%)
International Institute of Los Angeles	1,413	7	Spanish (77%), English (22%)
Korean American Community Services	363	3	Korean (99%)
Koreatown Youth & Community Center	809	8	English (38%), Spanish (33%), Korean (27%)
Little Tokyo Service Center	255	4	Korean (96%)
Madera Coalition for Community Justice	2,146	3	Spanish (85%), English (15%)
Pilipino Workers Center of Southern CA	92	3	English (80%), Tagalog (18%)
Portuguese Community Center	133	4	Portuguese (89%), Vietnamese (5%)
Self-Help for the Elderly***	2,229	8	Cantonese (97%)
Southeast Asian Community Center	1,128	5	Vietnamese (77%), Cantonese (22%)
Southland Integrated Services	371	2	Vietnamese (99%)
Suscol Intertribal Council	2	1	Native American English (100%)
The Fresno Center	1,169	11	Spanish (64%), Hmong (17%), English (15%)

* Languages Served represents the number of unique languages CBOs provided casework services in during the time period.

** Percentages are rounded to the nearest whole number.

*** SHE, Centro La Familia, Good Samaritan Family Resource Center, and Central California Legal Service are no longer part of the active CHANGES CBO network.

Table 4-3 below summarizes the volume of CHANGES Program services and activities each CBOs provided or held between 2022 – 2024 in each of the four program areas of interest: outreach (events and media placements), education events, needs assistance cases, and dispute resolution cases. This table is sorted by total program activity (from highest to lowest) and shows that 19 of the 28 CBOs that were providing CHANGES services during the study period (2022-2024) provided CHANGES services in all four program areas of interest based on the program tracking. While all 28 CBOs provided needs assistance and conducted educational events, four of the 28 did not have any dispute resolution cases and six of the 28 did not conduct any outreach events (those not providing any services are shaded in grey in the table below). This table also shows the significant range of program services provided across the CBOs, with needs assistance cases ranging from a low of two for the Suscol Intertribal Council to a high of 2,228 for Self-Help for the Elderly. Similarly, dispute resolution cases ranged from a low of zero for four CBOs to a high of 328 for IILA, educational events ranged from six (Central California Legal Service) to 868 (Alliance for African Assistance), and outreach events ranged from zero for six CBOs to 46 (Chinatown Service Center). Table 4-3 also highlights the different approaches each CBO takes in serving their community. For example, CBOs with lower case numbers and higher education events document a community-resilience strategy focused on preventing the need for case assistance; They recognize it can be difficult to resolve issues once clients get to the stage of needing case assistance, and they invest in education to reduce the need for more involved measures.

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TABLE 4-3: PROGRAM ACTIVITY BY CBO, 2022-2024

CBO	Needs Assistance Cases	Dispute Resolution Cases	Education Events	Outreach Events	Media Place.	Total
Self-Help for the Elderly (SHE)*	2,228	1	54	25		2,308
Madera Coalition for Community Justice	1,951	195	112	21	2	2,281
Southeast Asian Community Center	882	246	641	2	5	1,776
El Concilio of San Mateo County	1,204	250	294	12	4	1,764
Alliance for African Assistance	675	37	868	1		1,581
International Institute of Los Angeles	1,085	328	139			1,552
Asian American Resource Center	1,227	227	39	42		1,535
Chinese Newcomers Service Center	1,144	40	237	4	5	1,430
The Fresno Center	1,057	112	148		5	1,322
Armenian Relief Society	925	3	327	1	10	1,266
Chinatown Service Center	1,091		116	46	2	1,255
Koreatown Youth & Community Center	809		432	5	2	1,248
Centro La Familia*	902	51	87	25	1	1,066
Afghan Coalition	516	88	221	13		838
Delhi Center	485	123	154	28		790
Casa Familiar	532	39	159	24	1	755
Southland Integrated Services	361	10	112		11	494
Korean American Community Services	297	66	82	1	8	454
Little Tokyo Service Center	255		181	9	5	450
Good Samaritan Family Resource Center*	257	30	76	2		365
Asian Community Center Senior Services	207	17	120	18		362
Asian Youth Center	126	2	170	16	3	317
Suscol Intertribal Council	2		212			214
Portuguese Community Center	118	15	48	4	1	186
Compass of Madera	111	23	16			150
Asian Pacific Self-Development & Res Assoc	86	6	35	2		129
Pilipino Workers Center of Southern CA	86	6	22	1	3	118
Central California Legal Service*	19	9	6			34

* SHE, Centro La Familia, Good Samaritan Family Resource Center, and Central CA Legal Service are no longer participating.

4.3   DEMOGRAPHICS OF CLIENTS SERVED

The CHANGES Program was designed to serve LEP populations. However, that designation encompasses a wide range of people that could be served under that directive. Here, we look to understand who

specifically is being served by the CHANGES Program and why these populations are seeking CHANGES assistance. We also explore shifts in the communities served by the program through time and how these shifts in demographics impact CHANGES Program service delivery.

As part of the Market Profile Analysis, we completed in-depth semi-structured interviews with 15 CBOs and an additional 4 CBOs responded to our interview questions on their own via a web survey format. We paired data from these qualitative endeavors with a program tracking data analysis to characterize who the CHANGES Program is primarily serving and why those people are in need of assistance. While each CBO serves a distinct population (see Table 4-1 previously), we initially focus on program-wide results.

4.3.1   Languages Served

The CHANGES Program provided service in 37 documented languages during calendar years 2022-2024. Figure 4-1 below shows a breakdown of the four most common languages served by the CHANGES Program across 2016–2024; additional frequent languages (those captured in the "Other" category in Figure 4-1) are broken out in Figure 4-2. Since 2016, Spanish has always been the primary language CHANGES case assistance services have been conducted in. However, the percentage of services provided in Spanish have ranged from a low of 28% to a high of 45%. Since 2020, Cantonese has been the second most prolific language CHANGES services are provided in.[9]

FIGURE 4-1: DISTRIBUTION OF CASE ASSISTANCE FOR TOP LANGUAGES PER YEAR, 2016-2024

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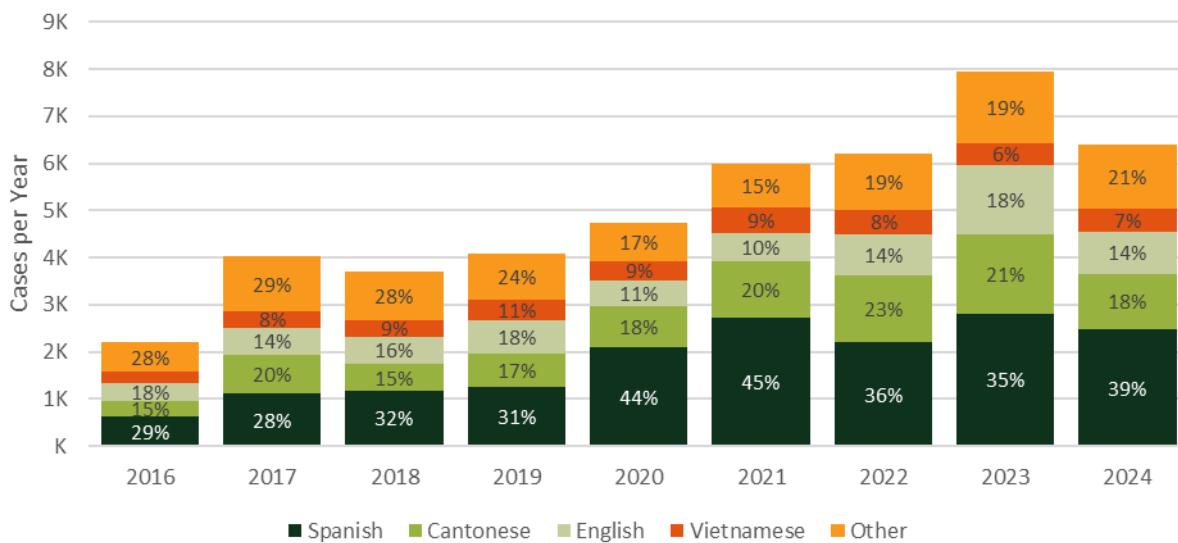
[9] Around 50% of the Cantonese cases during this time period are attributed to SHE, which is no longer participating in CHANGES as of PY 24/25.

FIGURE 4-2: DISTRIBUTION OF CASE ASSISTANCE FOR OTHER FREQUENT LANGUAGES PER YEAR, 2016-2024
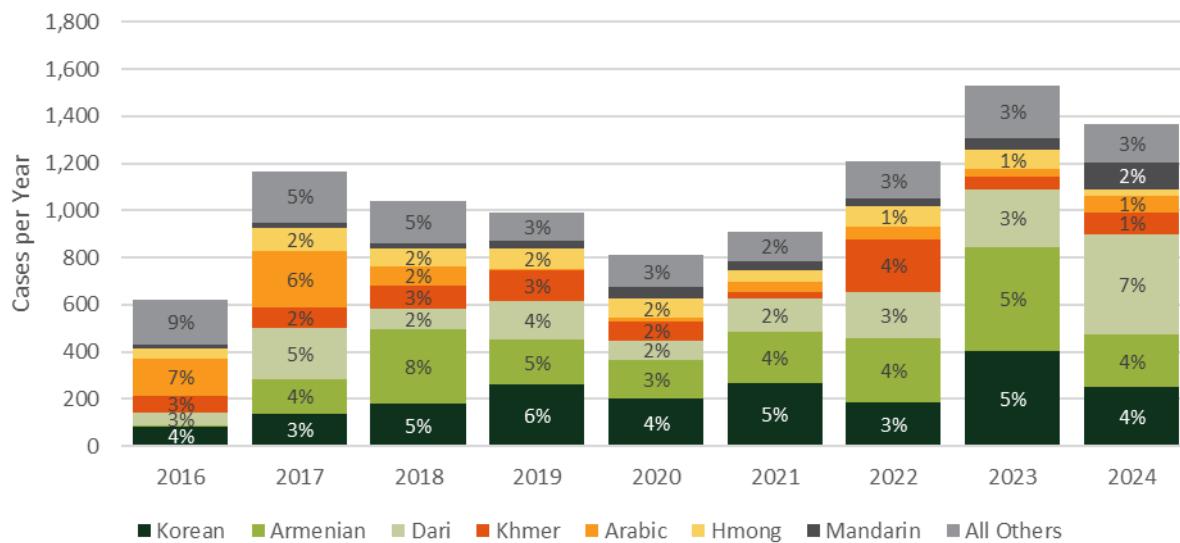
Note: percentages reflect the share of all casework within each year; see Figure 4-1 "Other" language category.

Non-LEP Clients

While English has also consistently been a top language, we learned in interviews that many cases recorded in the tracking data as English were not fully provided to clients in English. A number of CBOs shared that clients may begin their CHANGES interaction in English because they view speaking English as a point of pride and want to demonstrate their language capabilities. While these clients often have a good grasp of conversational English, as utility issues and discussions increase in complexity, CBOs find that client confidence in their English decreases and the cultural and contextual differences start to stand out (for example, if a client uses an English word as part of their native culture but it has a different contextual meaning from U.S. English). The need to understand complex topics and ensure assistance is appropriately received often leads these clients to switch back to their native language. In some of these cases, English was initially entered into the database as the service language and was never updated to reflect the multi-lingual reality in which the services were provided. Despite all of this, the percentage of cases completed in English has hovered between 10% and 18% since 2016 and does not seem to be consistently growing over time.

Figure 4-3 breaks down the ethnicities of clients whose casework was provided in English. As shown, the majority (86%) of these cases consist primarily of ethnically African American, Latino, or European American clients, with an additional 32 ethnic groups accounting for the remaining 14%. Over 98% of cases for both African American and European American clients are recorded as English. These two ethnic groups jointly make up over half of English cases across all years. Conversely, among ethnically Latino clients, English language accounts for approximately 11% of casework across all years. This group

represents a sizable share of English cases at 31% due to comprising over 40% of overall program casework – a direct result of the prominence of Spanish language cases and people. Although far less frequent within the casework, Eastern European and Native American clients are the only other ethnic groups each with over 100 cases across all years with English casework rates of approximately 90%. There are a handful of other ethnic groups with high proportions of English cases, but these are far too infrequent within the program to draw any meaningful inference.

FIGURE 4-3: DISTRIBUTION ENGLISH LANGUAGE CASES BY ETHNICITY PER YEAR, 2016-2024
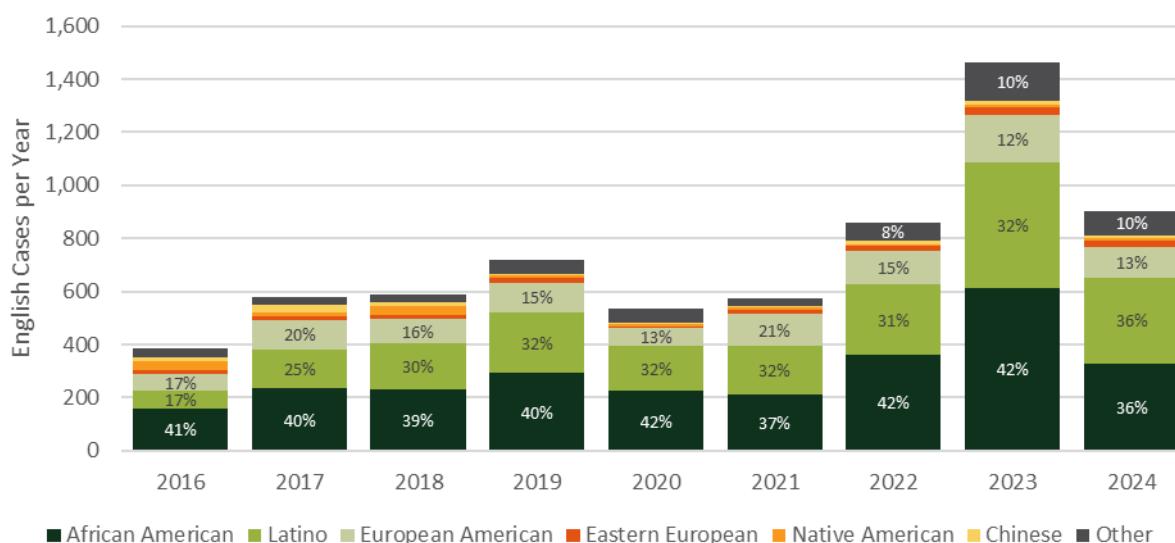
While some of the English reported cases can be explained by data entry inaccuracy, four CBOs reported that they saw an influx in English speakers in recent program years. CBOs shared that this is primarily due to the economic strain everyone is experiencing, and more people are needing help. Eight of the CBOs interviewed that serve English speakers shared that the assistance they need differs in some ways from the help needed from LEP populations. For example, English speakers often try to resolve problems on their own but end up hitting walls and thus seek out assistance from the CBO after they are unsuccessful resolving their issue on their own (or with their utility). In these cases, according to CBO interviews, English speakers often just need someone to help them once or show them how they can effectively deal with the utility issue they are facing on their own. Then, they are less likely to return in the future for assistance with a similar issue. CBOs also reported that some of their English-speaking clients can't read and thus are unable to navigate the utility system. There are also reports that English speaking clients are the children of the first generation LEP immigrants who, while they can speak English, lack an understanding of how to read a bill or deal with a complex utility issue. In fact, one CBO specifically mentioned that even if the clients can speak English, they still may not have a true understanding of how to resolve their utility issues

– or even that they can. When asked if serving English speakers impacts their ability to provide services to their LEP clients, all but one CBO reported that it does not impact those services.

Language Trends

Table 4-4 shows the top languages spoken in California for the population (5 years and older) that speaks English less than "very well" (i.e., LEP), as reported in the 2023 American Communities Survey.[10]

TABLE 4-4: LANGUAGE SPOKEN AT HOME ACROSS CA LEP POPULATIONS, 2022-2024

Language Groups*	Avg CA LEP Population	% of CA LEP Pop.	Cumulative % of CA LEP Pop.	# of CBOs Servicing
Spanish	4,164,726	63.4%	63.4%	19
Chinese (incl. Mandarin and Cantonese)	682,287	10.4%	73.8%	9
Vietnamese	330,027	5.0%	78.8%	7
Tagalog (incl. Filipino)	249,671	3.8%	82.6%	8
Korean	195,040	3.0%	85.6%	4
Persian (incl. Farsi and Dari)	93,850	1.4%	87.0%	9
Armenian	90,140	1.4%	88.4%	3
Russian	76,020	1.2%	89.5%	2
Arabic	68,198	1.0%	90.6%	4
Punjabi	63,440	1.0%	91.5%	N/A**
Japanese	51,574	0.8%	92.3%	4
Ilocano, Samoan, Hawaiian, other Austronesian Languages	42,784	0.7%	93.0%	4
Thai, Lao, other Tai Kadai Languages	41,630	0.6%	93.6%	5
Other Languages of Asia	36,704	0.6%	94.2%	3
Khmer	36,482	0.6%	94.7%	9
Hindi	35,921	0.5%	95.3%	3
Hmong	34,807	0.5%	95.8%	3
Other Language Groups	276,469	4.2%	100.0%	12

* Language group name designations and data come from Language table B16001 from https://data.census.gov.

** N/A indicates there were no CHANGES cases in this language group during these years.

To assess the degree to which CHANGES is serving the primary LEP populations in California, we created a ratio comparing casework prevalence to the relative population. This ratio is calculated for each language as the percentage (or share) of CHANGES cases served in that language by time period divided by the percentage (or share) of LEP customers in California with that as their primary language.

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[10] B16001: Language Spoken at Home by Ability to Speak English for the Population 5 Years and Over (2023 5-year Estimate)

$$CHANGES\ Case\ to\ Population\ Ratio = \frac{Share\ of\ CHANGES\ Cases}{Share\ of\ CA\ LEP\ Customers}$$

Table 4-5 below provides the CHANGES cases to population ratio for years 2016 – 2021 and 2022 – 2024 for the 17 most frequent language groups that made up nearly 96% of CA LEP customers.[11] Ratios greater than 1.0 indicate that a language group makes up a greater share of CHANGES cases than the LEP language group represents in California, while a value less than 1.0 indicates the opposite. Ratios less than 1.0 do not necessarily indicate that the language is underserved (as the need within that LEP community may for some reasons be less) but rather is a helpful metric for identifying which LEP communities are receiving relatively fewer CHANGES services. As Table 4-5 shows, Punjabi is the 10th most common LEP population in CA; however. no CHANGES casework services were provided to Punjabi-speaking clients in 2022-2024.

Table 4-5 can also be used to explore shifts in the LEP language groups served by the CHANGES Program over time. As this table shows, CHANGES Vietnamese cases have decreased over time relative to the LEP population (2.17 to 1.66) indicating fewer services are being provided to this community. We cannot know based on this analysis if this is due to a decreased need for services within this LEP population or due to CBOs being unable to properly meet the demands of this population. Relatedly, CHANGES services provided to Persian LEP customers have increased from 3.01 to 3.70, indicating a higher share of these LEP customers are being served by the program.

One language excluded from the table below is American Sign Language (ASL). Prior to 2022, the Deaf Community Service of San Diego provided aid to the deaf community. There is no evidence of ASL (or any other sign language) being served as part of the CHANGES Program since 2022. This is potentially a gap in service, however there were less than 30 recorded ASL cases between 2016 and 2021 and the CHANGES Program may not be the appropriate program to assist these customers.

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[11] The most frequent languages were determined based on 2023 census data which is the most census data available.

TABLE 4-5: CHANGES CASES TO POPULATION RATIOS OF LARGEST CA LEP POPULATIONS

Language Group*	2023 CA LEP Population	Case to Population Ratio	
		2016 - 2021	2022 - 2024
Spanish	4,164,726	0.66	0.70
Chinese (incl. Mandarin and Cantonese)	682,287	2.10	2.54
Vietnamese	330,027	2.17	1.66
Tagalog (incl. Filipino)	249,671	0.08	0.05
Korean	195,040	1.75	1.64
Persian (incl. Farsi and Dari)	93,850	3.01	3.70
Armenian	90,140	3.60	4.16
Russian	76,020	0.07	0.05
Arabic	68,198	2.34	0.88
Punjabi	63,440	0.02	N/A**
Japanese	51,574	0.28	0.09
Ilocano, Samoan, Hawaiian, other Austronesian Languages	42,784	0.13	0.16
Thai, Lao, other Tai Kadai Languages	41,630	1.42	0.42
Other Languages of Asia	36,704	0.16	0.10
Khmer	36,482	4.33	3.91
Hindi	35,921	0.09	0.03
Hmong	34,807	4.38	2.45
Other Language Groups	276,469	0.57	0.39

* Language group name designations and data come from Language table B16001 from https://data.census.gov.

** N/A indicates there were no CHANGES cases in this language group during these years.

4.3.2   Age of Clients Served

The CHANGES Program serves a variety of aged clients with most CHANGES case assistance clients in calendar years 2022 through 2024 being under the age of 65 (64% of clients). While this means 36% of CHANGES clients are 65 or older, in 2023 16.2% of Californian's were in this age range which indicates the share of elderly customers needing assistance with a utility issue is significantly higher than for younger customers. Age demographics can be heavily influenced by the language population and CBO. For example, CBOs that serve Asian populations have a much higher elderly demographic as most of the cases age 65 and above are Cantonese (81%), Korean (86%), and Mandarin (68%). Three CBOs reported that they are seeing an increase in the younger population seeking aid. One CBO noted that in some cases, they are seeing the younger generations of immigrant households (2nd generation) becoming heads of house and taking over duties. Others note that younger people simply need more aid given the current economic climate. Figure 4-4 shows the breakdown of CHANGES cases by age range from 2016 to 2024.

FIGURE 4-4: CHANGES CASES BY AGE RANGE PER YEAR, 2016-2024
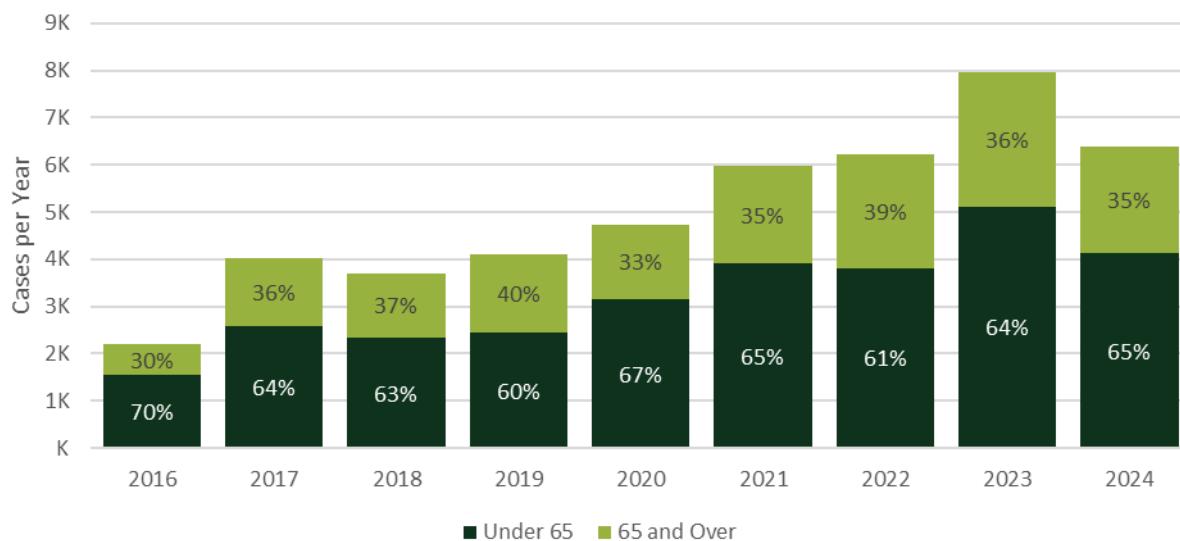
We analyzed whether case type varied with age and found that clients who are 65 and older request needs assistance significantly more often than those under 65 (p < 0.001, Chi-square test). We also find that CBO clients aged 65 and older have a much higher frequency of receiving assistance with LIHEAP applications across all program years (2016-2024). We heard in CBO interviews that elderly clients are often on fixed incomes and with rising rates (and therefore higher energy costs) these clients face greater challenges paying their bills. Older clients also often have difficulty navigating technology (both their own personal technologies and utility technologies - such as automated AI systems) which has made the need for assistance greater for this population. Table 4-6 shows the number of cases by request type (dispute or needs assistance) and client age group for 2022-2024.

TABLE 4-6: NUMBER AND PERCENTAGE OF CASES BY REQUEST TYPE AND CLIENT AGE GROUP, 2022-2024

Age Group	Dispute		Needs Assistance		Total # of Cases	Total % of Cases	% of CA Population*
	# Cases	% Cases	# Cases	% Cases			
Under 65	1,493	11%	11,576	89%	13,069	64%	84%
65 and Over	431	6%	7,062	94%	7,493	36%	16%
Total	1,924	9%	18,638	91%	20,562	100%	100%

*Represents the total percentage of each demographic (those under 65 and those over 65) within the CA population.

4.3.3   Recent Immigrants Served

To participate in the program, CBOs must serve or represent either immigrant or LEP communities as part of their mission. Eight CBOs noted in their interviews that they serve (at least in part) immigrants. Three of these CBOs specifically point out that one of the demographic shifts they've seen in recent years is an

influx of serving newly arrived immigrants.[12] CBOs report that this shift in who they are serving does impact services offered as newer immigrants often need more support, especially in navigating new systems they are unfamiliar with – like utilities, than those that have been in the U.S. for a while. This also likely leads to the finding that more than half of CBOs reported that most (80-100%) of their CHANGES clients lack familiarity with utility systems and seek aid for complex billing and service issues.

A sentiment that was shared by multiple CBOs during the interviews (n = 5) was how the current political climate is creating increased fear of deportation and distrust around sharing information with regulatory bodies. Some CBOs also spoke of how this fear of deportation (due to recent ICE raids) was leading some members of their communities to stay home and refrain from working, leading to decreased household income and increased need for CHANGES case assistance. Given the fact that having a safe environment for CHANGES clients to receive utility support is a core aspect in-line with the CPUC's Environment and Social Justice Action plan, and that the fear of deportation is strong in the CHANGES demographic, the CPUC should review and reconsider what CHANGES client information is essential to collect. The trust that is built up between the CBOs and their community is a fundamental reason the program is effective; if that trust is threatened, the program itself (as well as the reputation of the CBOs) is also threatened. If it is necessary for the CPUC to collect sensitive client information, they should ensure that the program tracking system captures only data that is absolutely necessary and, when possible, the data is recorded in an anonymous fashion to protect CHANGES client's anonymity.

4.3.4   Income Level and California Alternate Rates for Energy (CARE) Enrollment

Most clients served by the CHANGES Program are eligible for the California Alternate Rates for Energy (CARE) program. Low-income customers that are enrolled in the CARE program receive a 30-35% discount on their electric bill and a 20% discount on their natural gas bill. CARE eligibility is determined by whether a customer's household income is below specified thresholds. Customers may also be eligible for CARE if they are enrolled in certain public assistance programs such as Medicaid/Medi-Cal, Women, Infants and Children Program (WIC), Food Stamps/SNAP, or other programs. Each calendar year from 2016 through 2024, 95-96% of CHANGES clients were eligible for CARE enrollment, indicating that the vast majority of CHANGES clients are part of low-income households.

While most CHANGES clients are eligible for CARE enrollment, not all clients are enrolled at the time they seek CHANGES services. Table 4-7 shows the number and share of CHANGES cases where the client was already enrolled in CARE (for cases where the client was eligible for CARE). Starting in calendar year 2022,

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[12] Pew Research Center reported that "An unprecedented number of immigrants – more than 11 million – arrived in the U.S. between 2020 and 2025. That included more than 3 million in 2023 alone, the largest annual total ever recorded, according to a Center analysis of government data sources."
https://www.pewresearch.org/short-reads/2025/08/21/key-findings-about-us-immigrants/

the share of clients not already enrolled in CARE began increasing, at 18% of cases in 2022 and 26% of cases in 2024.

TABLE 4-7: CHANGES CLIENTS' CARE ENROLLMENT STATUS BY YEAR
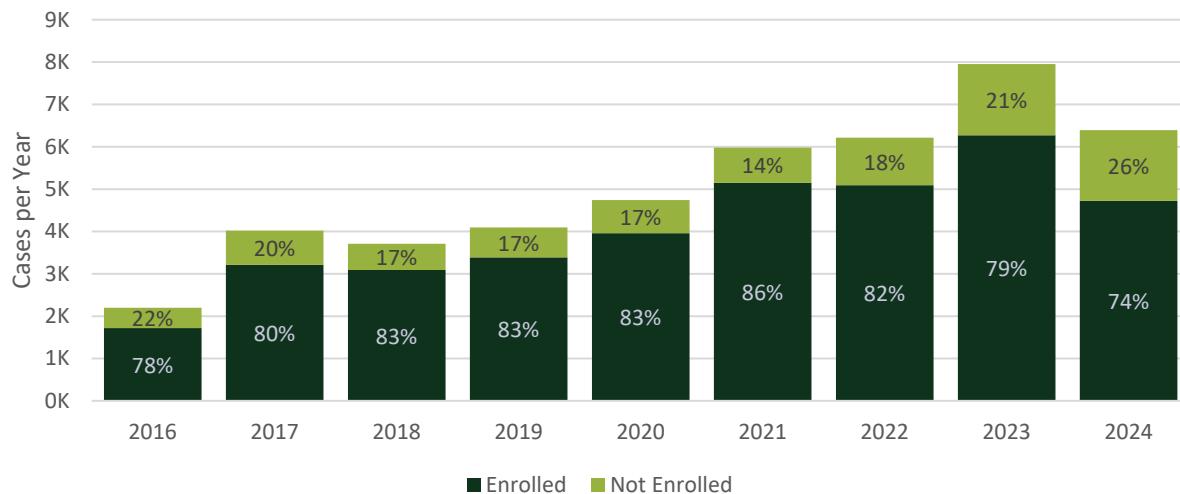
4.3.5   Other Client Characteristics

Interviewed CBOs were asked to estimate what percentage of their clients possess a characteristic (from a pre-defined list of characteristics) that may lead them to be in need of CHANGES Program assistance. As shown in the table below, the most common characteristic CBO clients shared was having Limited English Proficiency (18 of the 19 CBOs interviewed reported this and estimated on average 87% of their clients had this characteristic). Other characteristics shared by more than 80% of clients receiving CHANGES services were a Lack of Familiarity with Utility Systems (81%) and Difficulty Navigating Technology (also 81%). CBOs reported that more than half of their clients have a Fear or Suspicion of Utilities (59%) but only 5 CBOs reported that most of their clients (90% or more) possessed this characteristic.

TABLE 4-8: NUMBER AND SHARE OF CLIENTS WITH OTHER CHARACTERISTICS

Client Characteristic	Number of CBOs Reporting	Average % of Clients with Characteristic*	% of CBOs with 90% or more of Clients with Characteristic
Limited English Proficiency	18	87%	12 (67%)
Lack of Familiarity with Utility Systems	18	81%	11 (61%)
Difficulty Navigating Technology	16	81%	10 (63%)
Complex Billing or Services Issues	17	74%	10 (59%)
Lack of Access to Technology	18	69%	8 (44%)
Cultural Needs Not Met by Utilities	12	67%	6 (50%)
Fear or Suspicion of Utilities	16	59%	5 (31%)
Hearing or Vision Impairments	15	26%	0 (0%)

* This represents the average of what the CBOs reported and is not weighted by the share of cases/outreach of each CBO.

4.3.6   Impact of Changing Demographics on CHANGES Implementation

The shifts we note in terms of demographics – new immigrants, more youth, increased diversity of languages, and CBOs that are serving new language demographics not traditionally served in the past – has created some service challenges. CBOs report that they have had to adapt their language capabilities and cultural competency to new clients without receiving additional funding or in-language resource support. For example, not only are new outreach methods needed when serving clients in a new language, but staff must be hired to match shifting client demographics to ensure all clients can be served in-language. The demands of serving these expanding demographics have pushed many CBOs' budgets past their capability. We explore the implications of this shift further in Section 4.6.

4.4   SERVICES PROVIDED TO TARGETED CLIENTS

The CHANGES Program has three main services that it provides to clients: education, outreach, and case assistance. Education events are designed to help clients learn to understand and navigate utility systems, empowering them to understand their bills and energy resilience. These events are typically group events (for example, group sessions on applying to CARE/FERA) and often involve a post-education comprehension assessment (a.k.a., education evaluations). Outreach activities have the goal of bringing people into the CHANGES Program. Outreach activities can include media placement, tabling events, or other special community events or presentations. Case assistance is the meat of the CHANGES Program. Case assistance services are those that support clients with dispute resolution and needs assistance. Table 4-9 below shows the breakdown of education, outreach, and case assistance activities and clients served from June 2021 to June 2025.

As the table below shows, educational events, outreach activities, and case assistance all decreased in the most recent program year. Although program activity declined, this decrease reflects funding and reimbursement changes rather than reduced need. In PY 24/25 CBOs could no longer carry forward unused funds from prior program years,[13] additionally case reimbursement rates increased. For these reasons, available funds were exhausted more quickly and with less activity than in prior program years (this is discussed in more detail below in Section 6 Funding Analysis). Many CBOs reported completing program activities without receiving compensation due to budgetary constraints (nine CBOs reported completing uncompensated case assistance activities, ten reported uncompensated outreach activities, and six reported uncompensated educational events). This uncompensated work masks the actual volume of program activities being delivered.

TABLE 4-9: CHANGES PROGRAM ACTIVITIES AND CLIENTS SERVED ACROSS FOUR PROGRAM YEARS

Program Year	Education		Outreach				Case Assistance	
	Education Events (clients)	Education Evaluation (clients)	Media Placement	Special Outreach Project	Community Event or Presentation	Social Media (posting)	Dispute	Needs Assistance
PY 21/22	28,148	329	27	10	62	47	495	5,737
PY 22/23	34,209	558	30	8	82	34	651	6,336
PY 23/24	36,246	1,061	18	6	101	41	691	7,043
PY 24/25*	20,070	1,217	8	3	52	17	634	3,980

* Program years prior to PY 24/25 all began June 1 and ended May 31. In PY 24/25 this was changed to a July 1 – June 30 program year. This meant PY 23/24 included one additional month (was 13 months long) as this change was implemented.

One item that should be noted here is that in the most recent program year there were 1,217 Education Evaluations conducted. These are post Education Event assessments. We heard from the CBOs that these client evaluations are being completed by CHANGES clients and are sent to Milestone Consulting, however, there currently is no budget for analyzing the data being collected. This leads us to question the designated purpose of these Educational Evaluations. If the purpose is adult pedagogy as praxis (a.k.a., increasing learning on the part of the client via pre- and post-assessment reflections and increasing offering effectiveness through a review of these reflections), then there needs to be funding set aside to analyze and report back to CBOs on the results of the assessments to improve program offerings. If the purpose of the Educational Evaluations is to document that an educational offering occurred, the program should discontinue sending the completed Educational Evaluations to Milestone Consulting. The program

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[13] Prior to PY 24/25, the CHANGES Program was able to use unspent funds from the previous two years to be spent in the current year under State contracting rules. The new program contract beginning PY 24/25 no longer allows for fund shifting between program years. Note that State contracting rules are separate from CARE Program fund shifting rules, which does not allow fund shifting between program years (D.21-06-015).

could also then consider adding simple metrics regarding the effectiveness of the events that could be tracked over time.

4.4.1   Educational Services

CHANGES educational services are an important aspect to the program's cultural and equitable focus. Workshops are offered in eight topical areas. Figure 4-5 below shows the most attended workshops are those that help clients understand their bills. As previously discussed, many CBOs work with immigrants (with an increase in newly arrived immigrants in the program in recent years) and CBOs reported that 81% of their CHANGES clients lack familiarity with utility billing systems. As such, workshops like these are critical to increase utility bill knowledge and understanding and help to build resilience within these communities. The second most commonly attended workshop in the CHANGES Program is focused on client enrollment in CARE, FERA, or other assistance programs and highlights the important role CBOs play in ensuring their low-income clients are able to take advantage of all utility programs they are eligible for and that can help them stay on top of their utility bills and avoid disconnection.

As this table shows, educational event attendance (and events) decreased significantly starting in 2020 due to COVID. It had returned to pre-COVID levels by 2023, however fell again in 2024 as a result of fewer events being held (2,842 educational events were held in 2023 compared to 2,247 events in 2024, a downtick of approximately 20%) due to CHANGES budget constraints.

FIGURE 4-5: NUMBER OF PARTICIPANTS AND EVENTS BY EDUCATION TOPIC PER YEAR, 2016-2024

Legend:
- ■ Avoiding Disconnection/ Payment Options/ Billing Cycle
- ■ CARE & FERA/ Other Assistance Programs
- ■ Energy Conservation
- ■ Gas Aggregation
- ■ High Energy Usage
- ■ Level Pay Plan
- ■ Safety
- ■ Understanding your Bill
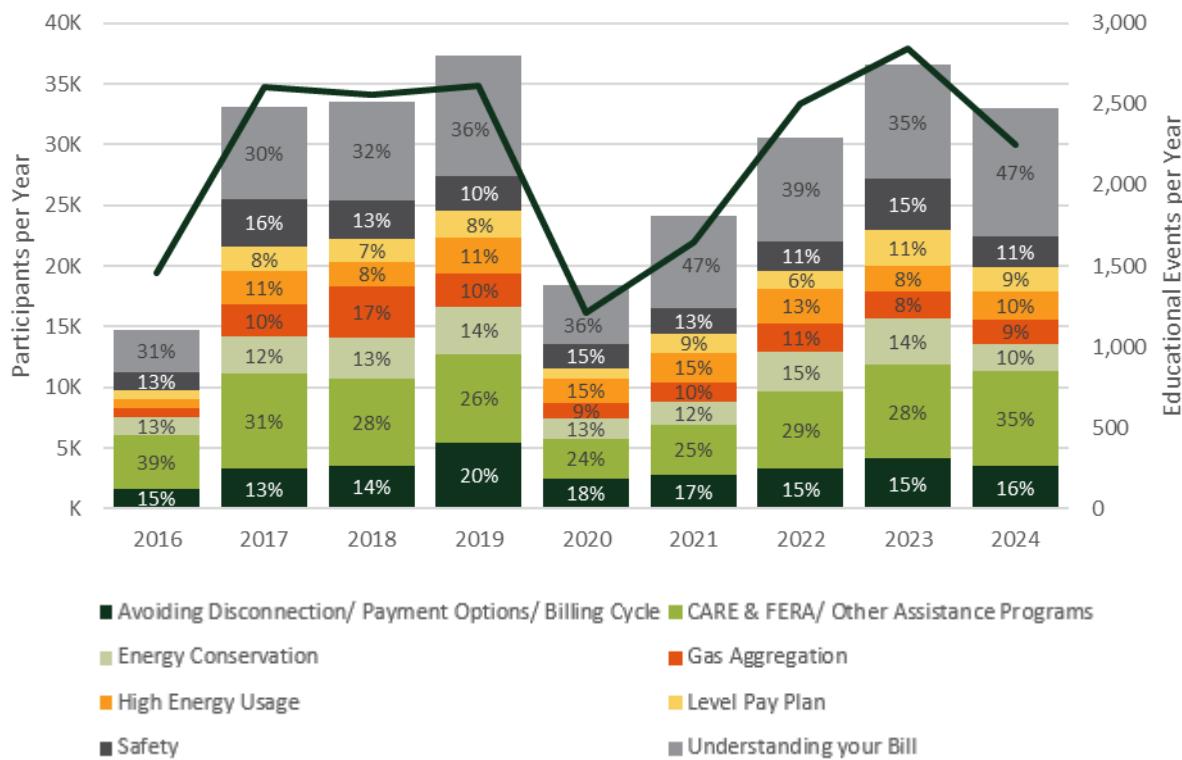
4.4.2   Outreach Activities

CHANGES outreach activities consist of community engagement efforts designed to raise awareness of program services and connect LEP customers with case assistance and education services. CBOs conduct outreach through community events and presentations, media placements, social media, and special outreach projects. Outreach is often coordinated with seasonal or topical priorities, such as high-bill periods, wildfire preparedness, or new program offerings, and is frequently tied to cultural or community celebrations such as Lunar New Year, or local heritage festivals to better engage residents and address emerging community needs.

The number of outreach events and estimated number of clients reached by year is shown below in Figure 4-6. The number of outreach events dropped dramatically in 2020 and 2021 due to COVID. In the years directly following, the number of outreach events increased. However, while the number of events held has returned to pre-pandemic levels, the estimated number of clients reached – both in total and on average per event – has not seen the same level of growth.

FIGURE 4-6: OUTREACH EVENTS AND ESTIMATED CLIENTS REACHED PER YEAR, 2016-2024
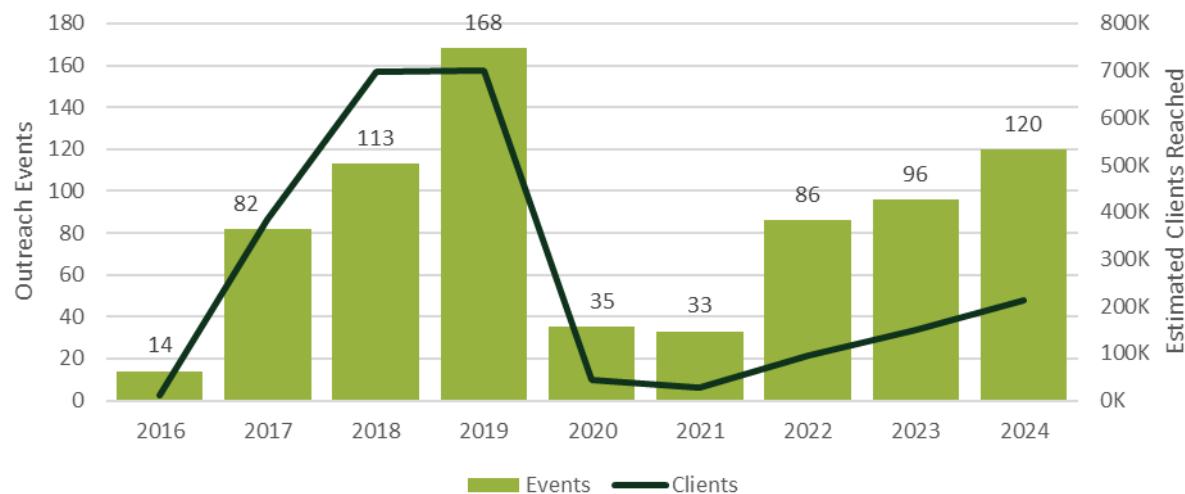
Figure 4-7 and Table 4-10 below collectively present the estimated number of clients reached by media placement type and the total number of media placements per year, respectively. Beginning in 2022, the estimated number of clients reached via media placements decreased significantly from previous years. This is due to a decreased frequency or emphasis on media placements post-COVID, whereas these media placements were likely more necessary during the COVID period. Data on social media placements were only available by program year for the last four program years (see Table 4-9 above).

FIGURE 4-7: ESTIMATED NUMBER OF CLIENTS REACHED VIA MEDIA PLACEMENTS PER YEAR, 2016-2024
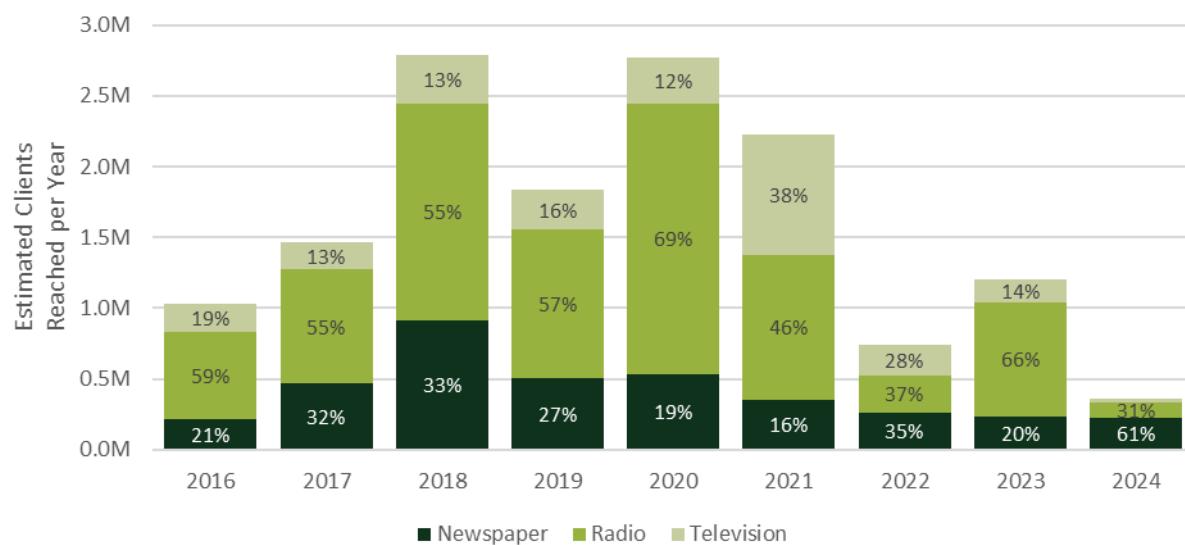
TABLE 4-10: OUTREACH BY NUMBER OF MEDIA PLACEMENTS PER YEAR, 2016-2024

Media Type	2016	2017	2018	2019	2020	2021	2022	2023	2024
● **Newspaper**	7	8	11	16	21	23	13	11	10
● **Radio**	6	9	15	12	19	15	9	12	3
● **Television**	4	6	11	10	10	12	3	5	2

According to program tracking data, the main outreach activities driving clients into the CHANGES Program are word of mouth from friends and family, other CBO programming, the CHANGES educational workshops, and community outreach events (Figure 4-8 below). Far and away, word of mouth seems to be the largest driver, though the success of and importance of educational events has increased in recent years (e.g., 9% in 2022 and 16% in 2024). The other large source of CHANGES clients comes from the CBO itself; this speaks to the unique ability of these CBOs to serve clients holistically. As with educational events, outreach activities have also declined across all categories from 2023 to 2024, though several contextual factors help explain this trend. When funding is severely limited, case management understandably becomes the priority, as CBOs can rely on the fact that most clients enter the program through word of mouth or pre-existing relationships rather than through formal outreach efforts. As discussed in the Funding Analysis section below, under budget constrained conditions, the program de-prioritized certain outreach efforts (such as media placement) to preserve funds for case assistance. However, it's also important to know that 10 CBOs report continuing unpaid outreach activities (as a result of budgetary constraints).

FIGURE 4-8: CASES BY REFERRAL SOURCE PER YEAR, 2016-2024
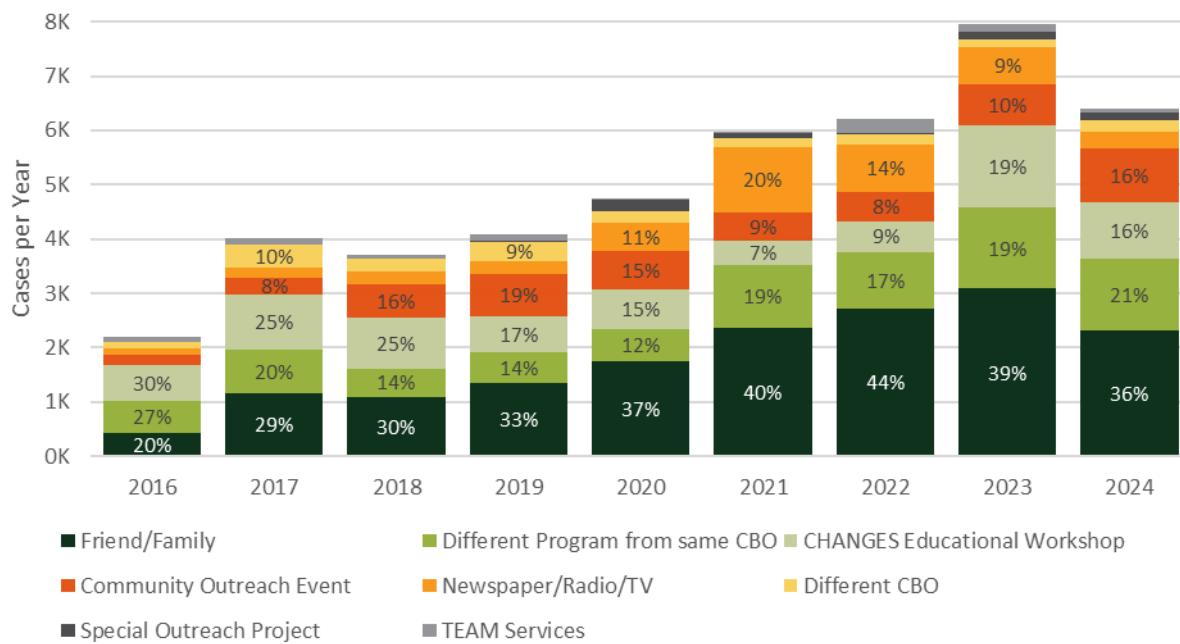
4.4.3   Case Assistance

Case assistance is a core component of the CHANGES Program and CBO activity, providing individualized support to LEP customers who need help resolving billing disputes, accessing financial assistance, or managing their utility accounts. Several CBOs reported that case complexity – often driven by the increased need clients face for multiple and varying types of assistance - has increased in recent years, leading to longer resolution timelines. Although overall case counts declined in PY 24/25 (Table 4-9), this decrease reflects funding and reimbursement changes rather than reduced need. Because CBOs could no longer carry forward unused funds from prior program years and reimbursement rates per case increased, available budget allocations were exhausted more quickly with fewer cases (this is discussed in more detail below in Section 6 Funding Analysis). Several CBOs reported continuing to assist clients without payment once budgets were depleted. One CBO reported not receiving CHANGES reimbursements for three months but still providing CHANGES services to clients, as they were able to, because 'this is their family, their friends, their community'.

As shown in Figure 4-9 below, case assistance peaked in 2023 before declining slightly in 2024. This pattern mirrors the funding shift described above rather than demonstrating an actual drop in demand. When funding levels were higher in PY 22/23 and PY 23/24 due to unspent funds from prior contract years, the

data shows a steady upward trend in both dispute and needs assistance casework. The proportion of dispute cases rose steadily, reflecting post-pandemic billing issues and arrearage management challenges, while needs-assistance cases remained consistently high. CBOs indicated that 2024 case volumes would likely have matched 2023 levels had funding remained stable. Increased funding in future program years would help to ensure the CHANGES Program (via the CBOs) can provide assistance to all LEP customers in need.

FIGURE 4-9: CASES BY RESOLUTION TYPE PER YEAR, 2016-2024
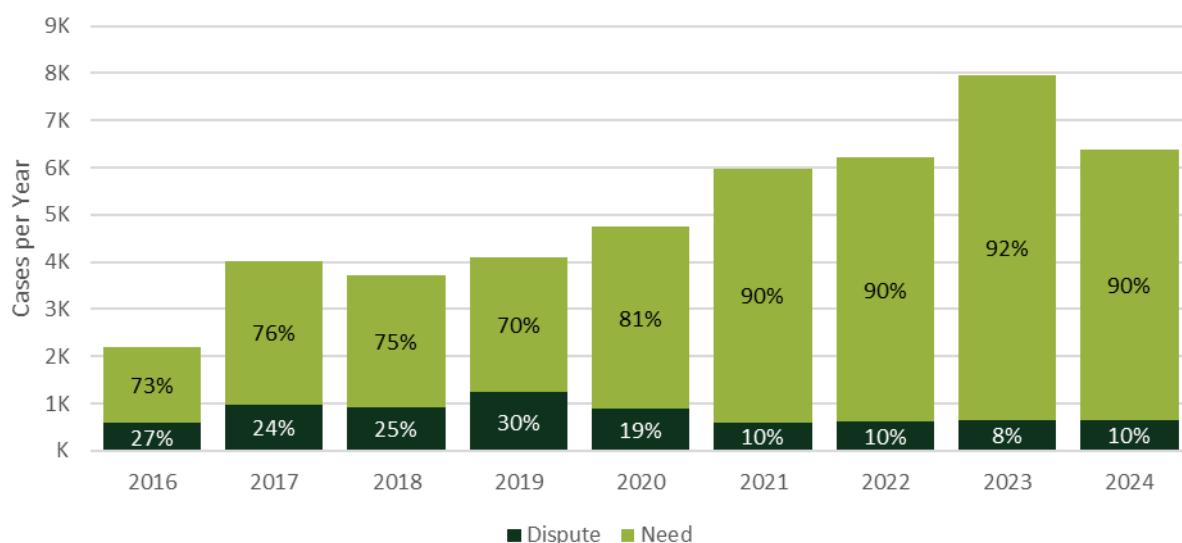
Case resolution activities are recorded in the program tracking data by selecting from a list of 52 distinct resolution names. As shown in Table 4-11 below, these resolutions can be categorized into eight categories, and 17 subcategories (these same categories are used in the CHANGES Annual Reports prepared by the program implementer). The average number of cases per year during 2016–2021 and 2022–2022 are presented in Table 4-11 and the case volume by category and year are shown in Figure 4-10. Payment-related support remains the largest share, including enrollment in emergency assistance funds and LIHEAP applications. Monthly bill-reduction programs such as CARE, FERA, Medical Baseline, and AMP follow closely behind. Assistance with payment difficulties and monthly bill-reduction now make up 86% of total cases, while they were a smaller proportion of overall cases (76%) in previous years. Assistance with AMP and CARE program support increased significantly in terms of the proportion of program cases (now 11% and 9%, respectively). Overall case volume has grown for payment difficulties, monthly bill reduction services, account administration and servicing, and gas aggregation issues. Issues with electricity aggregation and solar have stayed roughly the same, in terms of case volume, and billing disputes and other items have decreased in volume.

TABLE 4-11: TYPE OF CASE RESOLUTION SERVICES PROVIDED BY SUBCATEGORY AND SERVICE, 2016-2024

Category	Subcategory	Resolution	Avg Cases per Year, 2016-2021	Avg Cases per Year, 2022-2024
Payment Difficulties	Arrearage Management Plans (AMP)	AMP Billing or Enrollment Problem*	0.2	40
		AMP Enrollment	121	580
		AMP Follow-Up	7	138
		Subtotal	128	757
	Emergency Financial Assistance Programs	COVID-19 Emergency Payment	8.33	12
		Enrolled in PG&E Energy Assistance Fund	10	-
		Enrolled in PG&E REACH Program	109	357
		Enrolled in SCE Energy Assistance Fund	70	106
		Enrolled in SCG Gas Assistance Fund	201	432
		Enrolled in SDG&E Neighbor-to-Neighbor Program	154	151
		Other Sources of One-Time Payment	19	130
		Subtotal	570	1,189
	LIHEAP	LIHEAP Application Assistance	1,604	2,628
		Subtotal	1,604	2,628
	Support with Payment Plans or Extensions	Set Up Payment Extension	90	144
		Set Up Payment Plan	211	244
		Subtotal	301	387
	Other	Assisted with Reconnection	0.2	14
		Canceled 24-Month Payment Plan	0.2	0.7
		Refer to Energy Assistance Programs	130	-
		Subtotal	130	14
	Payment Difficulties Total		**2,733**	**4,976**
Monthly Bill Reduction	Energy Savings Assistance (ESA) Program	Applied For/Support with ESA	87	44
		Subtotal	87	44
	Medical Baseline	Medical Baseline	171	180
		Subtotal	171	180
	Percentage of Income Payment Plan (PIPP) Program	Applied For/Support with PIPP	-	17
		Subtotal	-	17
	Support with CARE Program	Assisted High Energy User	4	10
		CARE/FERA	63	575
		High Energy User Dispute	0.8	-
		Subtotal	68	585
	Support with Lowering Energy Use or Managing Bills	Added/Removed Level Pay Plan	7	4
		Demand Response Programs	2	0.3
		Energy Efficiency Tool	18	60
		Scheduled Energy Audit	4	2
		Subtotal	32	66
	Monthly Bill Reduction Total		**358**	**892**

Category	Subcategory	Resolution	Avg Cases per Year, 2016-2021	Avg Cases per Year, 2022-2024
Billing Disputes	Billing Disputes	Bill Adjustment	53	17
		Collections	0.3	2
		Requested Meter Service or Testing	9	4
		Subtotal	62	23
Account Admin & Servicing	Account Admin	Added/Removed Automatic Payment	0.5	6
		Added/Removed Paperless Billing	2	18
		Assisted with Making a Payment	4	46
		Changed Billing Language	72	38
		Changed Consumer Information on Account	139	62
		Closed Account	2	19
		Set Up 3rd Party Notification	0.3	7
		Set Up Energy Alerts	0.5	8
		Set Up New Account	72	153
		Set Up Online Account Access	6	145
		Subtotal	299	503
Electricity Aggregation	Electricity Aggregation	Electricity Aggregation	129	102
		Subtotal	129	102
Gas Aggregation	Gas Aggregation	Gas Aggregation	88	148
		Subtotal	88	148
Solar Issues	Solar Issues	Solar Issues	17	13
		Subtotal	17	13
Other Items	Other Items	Changed 3rd Party Company	164	-
		Consumer Education Only	3	2
		Identity Theft	-	2
		Reported Safety Problem	3	0.3
		Reported Scam	2	3
		Scheduled Service Visit	9	10
		Stop Disconnection	178	-
		Time of Use/Rate Plan Selection	18	119
		Utility Company Would Not Speak with CHANGES CBO	0.2	7
		Wildfire Related Assistance	-	0.3
		Subtotal	375	143

Note: Average case counts are rounded to the nearest whole number if greater than one and rounded to the first decimal if less than one.

* Resolution E-5114 was approved by the CPUC on December 18th, 2020 and required the IOUs to begin enrolling customers in AMP by February 1, 2021.

FIGURE 4-10: TYPE OF CASE RESOLUTION SERVICES PROVIDED BY YEAR, 2016-2024
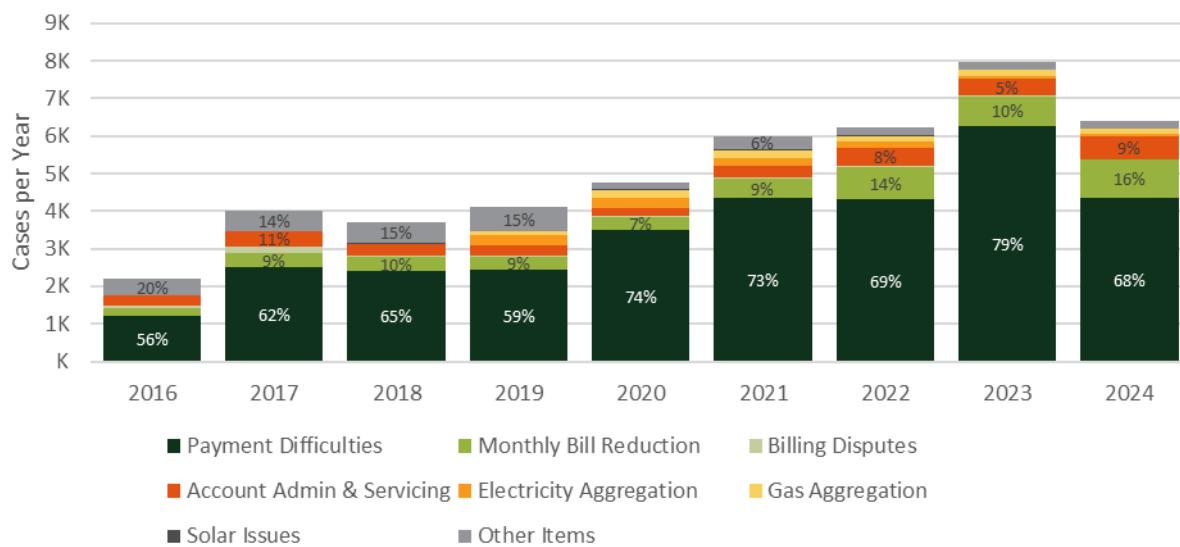
Reasons Clients Unable to Help Themselves

Many customers seek assistance from utilities independently before turning to CBOs. When asked how often clients tried to resolve their utility issues themselves before turning to the CBOs, three CBOs said it happens "Often", and eight said "Sometimes", and three said "Never." Six CBOs explained that clients are unsuccessful in resolving their issues independently due to language barriers, five CBOs cited customers' difficulty navigating IOUs, and four CBOs mentioned clients' limited financial literacy or education as barriers to their ability to resolve issues on their own.

Repeat Services

As mentioned in the section on tracking data limitations (Section 4.1.2) above, there is no unique client identifier in the program tracking data. For this reason, we could not quantify the number of clients that return for repeat services. We did, however, ask CBOs how often clients return for additional help after their initial issues had been resolved and 44% said "Often" and 50% said "Sometimes". When asked whether clients return for assistance with a different issue or additional help with their initial issue, 58% of CBOs reported that it was for a different issue, and 42% said it was for the same issue. CBOs explained a variety of reasons that lead to returning clients: some clients are unable to keep up with payments and so repeatedly get behind on their bills, some clients return each month to ask a question about their bill, and some clients return each month to pay their bills as they lack access to or familiarity with technology to do so themselves. Additionally, most programs like LIHEAP, AMP, and CARE require periodic re-enrollment or re-certification, at which point clients return for assistance.

Educational events and materials can help reduce the need for repeat services. Currently, most printed CHANGES educational materials direct clients to seek assistance from the CHANGES Program CBOs. Printed materials should also include information about how clients can go about signing up (or re-enrolling) for specific services on their own. When a client receives certain types of assistance, or attends educational events on a topic, they should be provided with materials that guide them on how to help themselves. Creating additional, simply written, in-language materials, could help prevent the need for case services (or return case services) for a portion of CBO clients. The CHANGES CBOs are likely the appropriate authors of such additional materials (in collaboration with the CPUC and IILA/Milestone Consulting) as they are the most knowledgeable about the difficulties clients face and which of these issues could potentially be resolved by the client on their own if additional client-facing materials were available. The annual weeklong CBO training could be an opportune time for CBOs to collaborate on the initial development of these types of materials. CBOs would need to be compensated for developing such materials (and overall program funding increased accordingly).

Unresolved Cases

Sometimes CHANGES cases are never resolved. Upon review of the program tracking data, we found 377 cases that were opened sometime between 2016 and 2023 and were still marked with the open "Progress" case status. Notably, over 200 (55%) of these unresolved cases were opened in 2021. When asked to explain the main reasons why cases aren't resolved, CBOs listed a wide variety of reasons including that required documentation was missing, the utility or 3rd party aggregator was not responsive, or clients were not eligible for any programs that could help them.

TABLE 4-12: CBO REPORTED REASONS FOR UNRESOLVED CASES

Reason for Unresolved Cases	% of Responses
Documentation is missing	35%
Utility is unresponsive	35%
Not eligible for assistance programs	35%
Client doesn't follow through	29%
Issue is too complex	12%
Other reasons	12%

Arrearages

In calendar years 2022 through 2024, 30% to 38% of CHANGES clients had outstanding balances on their bills (Figure 4-11). By contrast, 21% of California households in 2023 were behind on bills,[14] meaning that

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[14] Report on Residential and Household Utility Service Disconnections Pursuant to Public Utilities Code Section 910.5: 2019-2023 Results, April 2024 (CPUC) https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/office-of-governmental-affairs-division/reports/2024/disconnections-report-2024_pu-code-sec-910.pdf

the share of CHANGES clients with outstanding balances is higher than the general population. Over this same time period, 12% of clients were marked as pending disconnection in the tracking data and 0.6% had already been disconnected. Figure 4-12 below shows how the median outstanding balance increased dramatically in 2021, post-COVID, from $226 in 2020 to $483 in 2021. The higher outstanding balance levels remained through 2024, as California residential rates continued to increase. During our interviews, CBOs described how incredibly difficult things can get when a customer is behind on bills and disconnected. In fact, one participating CBO focuses their program activity exclusively on community education to do everything in their power to avoid clients entering arrears and risking disconnection. In calendar years 2022 through 2024, the CHANGES Program helped clients with outstanding balances of approximately $1.2 million per year to sign up for payment plans and monthly bill assistance programs to help alleviate these issues. This assistance for clients is also a benefit to ratepayers as this mitigates the risk of these outstanding balances turning into defaults that ultimately come out of ratepayer funds.

FIGURE 4-11: CASES PER YEAR BY OUTSTANDING BALANCE DUE, 2016-2024
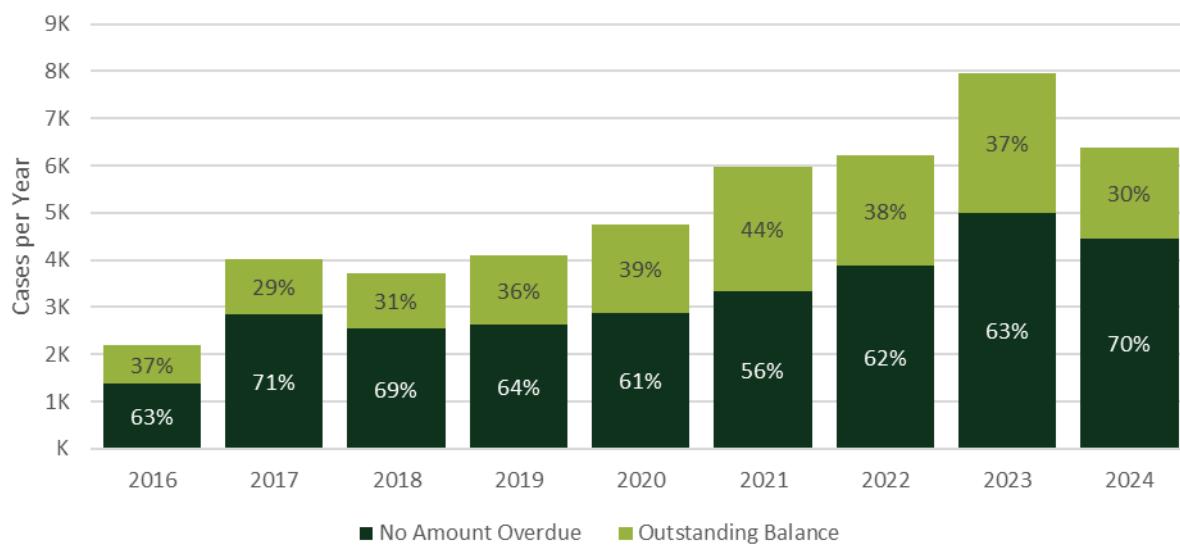
FIGURE 4-12: MEDIAN OUTSTANDING BALANCE DUE AND NUMBER OF CLIENTS BY YEAR, 2016-2024
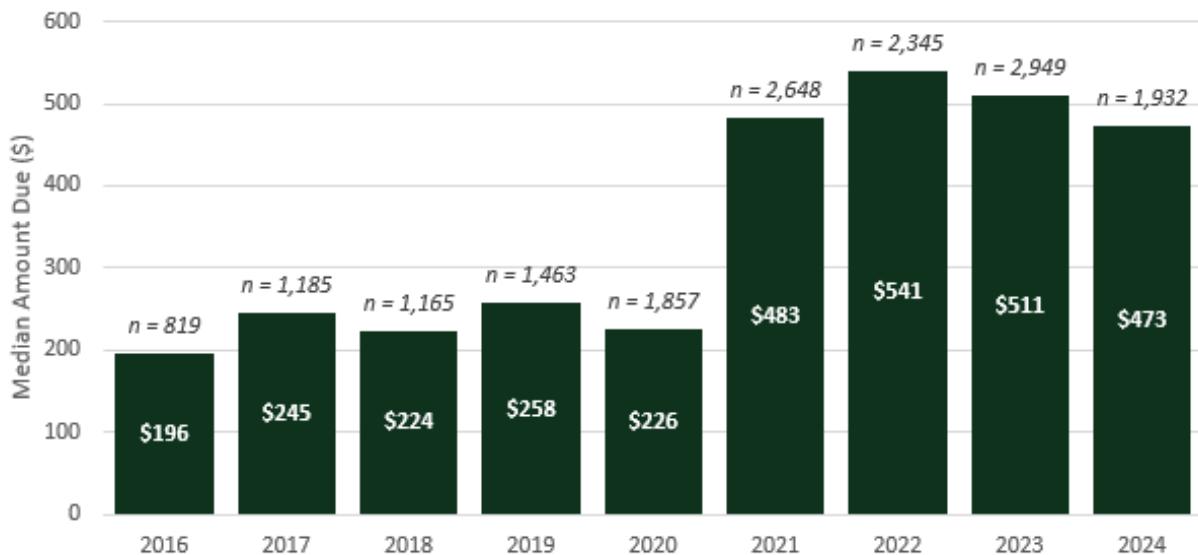
4.4.4 Impacts to Providing Service

Aspects outside of funding limitations also impact the CHANGES CBOs' ability to provide adequate service to their clients. CBOs report administrative burden impacts their resources and ability to provide assistance to clients. We talk through some examples below and explain how these aspects of the program negatively impact CBO's ability to provide service to clients.

Administrative Burden

CHANGES CBOs report that extensive paperwork requirements take significant time away from service delivery. Particularly burdensome or potentially unnecessary administrative tasks, like creating outreach event calendars after events have already occurred, serve little strategic purpose while consuming valuable staff time. Additionally, requests like providing the CPUC with human interest client stories without additional overall program funding to support these activities, further strains already limited program resources.

CBOs also report that data collection requirements have become overly complex and are creating substantial operational challenges in some cases. Some CBOs noted that requesting detailed client information that potentially compromises privacy protections is ill-advised and jeopardizes clients' feelings of safety in the current political climate. We also heard that the database systems themselves present difficulties in exporting and analyzing the data collected. These complexities suggest the need for a review, and where feasible, simplification of the data collection process, making it more manageable for implementers while still capturing necessary program data.

With limited overall program funding, the cumulative effect of these administrative burdens pulls staff capacity away from direct client services. We recommend a review of all administrative activities and expectations to ensure CHANGES Program funding is being spent in manner that optimizes the impact and quality of services being delivered to the targeted communities in need of assistance.

IOU Interactions and Collaboration

Many CBOs expressed frustration about their interactions with IOUs and noted it has impacted their ability to provide services to CHANGES clients. One trouble area relates to ensuring the CBOs can get the necessary IOU support to address client cases in a timely manner. We heard from CBOs during interviews and at the CBO training that many CBOs struggle to reach Customer Service Representatives (CSRs). Though CBOs are given access to unlisted IOU service numbers (often these contacts are for the Consumer Affairs Branch), many CBOs report that often no one answers these phone lines and so they resort to calling the standard IOU customer service lines. The wait time on these standard lines can be long and the CSRs who answer these calls are often not familiar with the CHANGES Program. Many CSRs are unaware that CHANGES clients can authorize the CBOs to speak directly with the IOUs on their behalf and thus the CSRs insist that an interpreter be added to the call and that clients remain on the line. This can significantly extend the time it takes for a CBO to resolve a CHANGES client's issue. It is our understanding that within the last month, the CPUC has worked with IOUs to get access to new IOU support phone numbers. While this is a step in the right direction, it is essential that a communication pathway be identified such that the CBOs are able to raise any issues they have with these lines to the CPUC and the IOUs in a timely fashion.

Another area for improvement is with the Quarterly meetings which are attended by the CPUC, the IOUs, IILA and Milestone Consulting. We received feedback that these meetings are currently hampered by time constraints which provide little flexibility to continue productive conversations when they arise. These communication restrictions limit the meetings' effectiveness. These meetings present an opportunity to foster collaborative relationships between the parties in attendance. Several modifications could transform these meetings from their current format into more useful collaborative sessions. Simple steps like the CPUC soliciting agenda items beforehand could ensure relevant topics are addressed and appropriate time is allotted to each topic. Focusing these meetings on substantive issues, like program challenges and potential solutions, could create a powerful space for collaborative problem-solving that would benefit all attendees. Additionally, adding standing topics, such as status updates on the IOU's phone lines, could serve as a communication pathway from CBOs (via IILA) to the CPUC and IOUs on what is working and where difficulties in program implementation remain.

Increased IOU collaboration could also include improved information pathways from the IOUs to the CBOs in order to help the CBO more effectively deliver CHANGES Program services. Examples of this include the

IOUs providing the CHANGES team with timely updates on policy changes, IOU program availability, and eligibility requirements to ensure the CBOs aren't operating with outdated information.

Materials not in Language

We heard from some CBOs during interviews and at the in-person CBO training that not all CBOs currently have CHANGES Program materials in languages that are accessible to their clients. CBOs report that some formerly translated materials may have been lost (and thus are unavailable) and they have had issues with the current program material request process.[15] We understand from the CPUC that the topic of in-language program materials has been a standing agenda item for the monthly CHANGES implementation meetings (that include CPUC, IILA, and Milestone Consulting staff) and that currently these parties are actively working together to ensure all program materials are available in the necessary languages. Going forward, the CPUC, IILA, and Milestone Consulting should continue to ensure there is a clear process for CBOs to escalate any issues they encounter accessing in-language program materials so that CPUC staff is alerted to any order fulfillment issues and can ensure they are being addressed.

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[15] The current process for CBOs to receive in-language program materials is for them to submit an email request to the CPUC (with a courtesy copy to IILA and Milestone Consulting) so that the order can be fulfilled (printed and shipped) by a CPUC print center at no cost to the CBOs. The existing process aims to have all orders delivered within 3 weeks of the order being placed.

4.5 GEOGRAPHIC DISTRIBUTION AND SERVICE GAPS

This section presents the results of our geospatial analysis, used to determine where CHANGES CBOs provide services, whether this effectively serves the customer segment needs, and where gaps occur. We analyzed how CBO services vary across the state, and how service levels compare to areas of high need (as determined by large LEP populations, and populations with high energy burdens). We also explored the geographic distribution of services by language compared to areas with the largest LEP populations that speak a given language. These findings can be used to identify areas in need of additional, or fewer, CHANGES resources (as measured by case entry service levels).

4.5.1 Methods

During interviews, CBOs reported providing CHANGES Program services primarily within self-defined service areas, but that they also serve clients outside their immediate service area when language needs or referral pathways bring in those clients. In this section we explore the geographic distribution of CHANGES services provided throughout California during the last three calendar years (2022-2024) and identify areas of high need based on the population of LEP households in California (per the Census Bureau's American Communities Survey (ACS)).[16] We also analyzed CHANGES Program service levels compared to areas facing high energy burdens per the Department of Energy's (DOE) Low-Income Affordability Data (LEAD) Tool.[17]

CHANGES Program service levels were determined based on calendar years 2022 to 2024 case activity from the program tracking data. Cases were reported at the zip code level[18] and were mapped to their associated census tract and county. In many cases, zip codes span across multiple census tracts and so we used HUD's ZIP code crosswalk files to map each zip code to one or many census tracts.[19] This data includes a "residential ratio" field, which represents the "ratio of residential addresses in the [ZIP/Tract pair] to the total number of residential addresses in the entire ZIP."[20] Cases in zip codes that spanned multiple census tracts were apportioned out to the corresponding census tracts based on their residential ratio.

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[16] https://data.census.gov/

[17] https://www.energy.gov/scep/low-income-energy-affordability-data-lead-tool

[18] Although the CHANGES tracking data records clients' street address, the evaluation team was not provided any fields with personally identifiable information (PII) to preserve clients' privacy. The evaluation team was only provided the zip code and city that corresponded with each case ID.

[19] https://www.huduser.gov/portal/datasets/usps_crosswalk.html

[20] HUD USPS ZIP Code Crosswalk Files Documentation:
https://www.huduser.gov/portal/datasets/usps_crosswalk.html

The analysis presented in this section excludes any case activity from CBOs that were active in calendar years 2022 through 2024 but are no longer administering the CHANGES Program. Excluding these CBOs from the geospatial analysis allows us to present the current CHANGES geographic coverage and identify geographic gaps in service. CBOs excluded from this section include Self-Help for the Elderly (SHE), Centro La Familia, Good Samaritan Family Resource Center, and Central California Legal Service. Notably, SHE made up 10.8% of the case assistance activity in 2022-2024 (with 99.8% of their cases in San Francisco County)., Centro La Family contributed another 4.6% of total case assistance (97.7% in Fresno County), Good Samaritan Family Resource Center contributed 1.4% of total case assistance (99% in San Joaquin County), and Central California Legal Service contributed 0.1% of total case assistance (primarily in Fresno and Tulare counties).

Households may receive CHANGES case assistance services for issues they have related to gas or electric services received from one of the four major IOUs in California. Figure 4-13 below shows the gas and electric service territories of the four major IOUs in California.

FIGURE 4-13: ELECTRIC AND GAS IOU SERVICE TERRITORIES IN CALIFORNIA
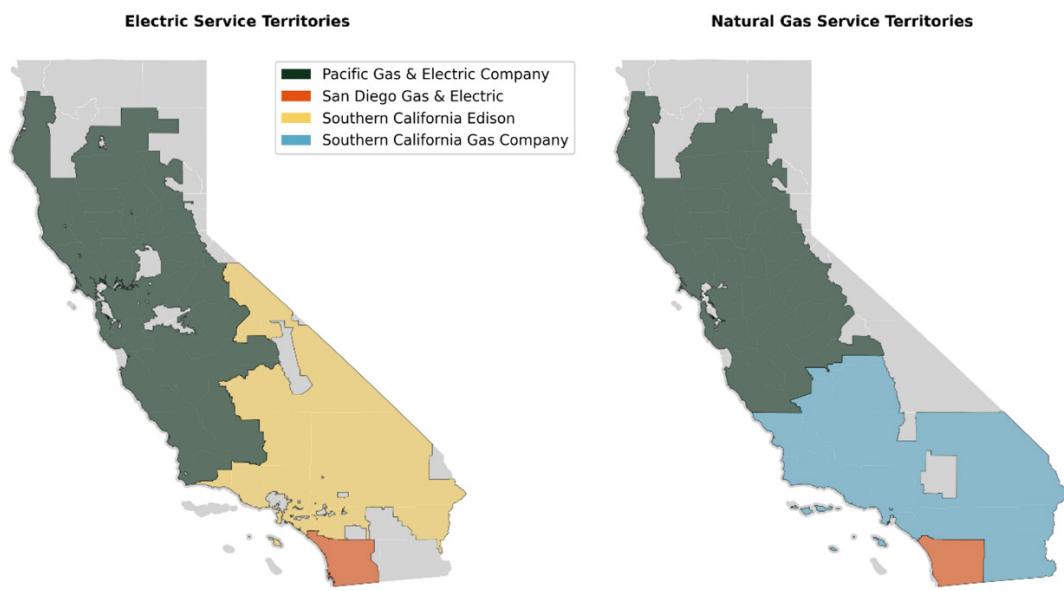
Looking at the distribution of LEP households in California across census tracts,[21] we can summarize the proportion of these households within a county that are outside of the service territories of the four IOUs (Table 4-13). Throughout the remainder of this section, the ACS-reported households or population for a given county excludes all census tracts that are wholly outside of electric or gas IOU service territories.

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[21] ACS S1602 Limited English Speaking Households, 5-year estimate 2023, tract level

TABLE 4-13: PROPORTION OF LEP HOUSEHOLDS OUTSIDE OF IOU SERVICE TERRITORIES, BY COUNTY

County Name	% Outside Electric IOU Territories	% Outside Gas IOU Territories
Alameda	3%	0%
Alpine	100%	100%
Del Norte	100%	100%
El Dorado	35%	35%
Humboldt	0%	4%
Imperial	99%	0%
Inyo	0%	31%
Kern	0%	1%
Lassen	88%	88%
Los Angeles	47%	3%
Merced	44%	0%
Modoc	100%	100%
Orange	6%	0%
Placer	33%	16%
Plumas	0%	50%
Riverside	34%	0%
Sacramento	88%	0%
San Bernardino	1%	17%
San Joaquin	6%	0%
Santa Barbara	5%	0%
Santa Clara	4%	2%
Shasta	33%	0%
Siskiyou	100%	100%
Stanislaus	81%	0%
Trinity	86%	86%

4.5.2   Geographic Distribution of Services

CHANGES services take place throughout the state. Table 4-14 shows case activity by service type and IOU territory for CHANGES activities that took place in 2022-2024.[22] Interestingly, more case assistance and education events took place in PG&E territory than in southern California (SCE, SCG, and SDG&E). While more outreach events and media placements occurred in southern California compared to PG&E territory.

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[22] Excluding Self-Help for the Elderly, Centro La Familia, Good Samaritan Family Resource Center, and Central California legal Service.

TABLE 4-14: CHANGES ACTIVITY BY SERVICE TYPE AND IOU TERRITORY, 2022-2024

IOU Name	Case Assistance*	Education Events	Outreach Events	Outreach Media Placements
PG&E	8,632	2,253	77	30
SCE	3,305	1,692	148	36
SoCalGas	3,797			
SDG&E	1,382	868	25	1

* SCE and SoCalGas case assistance each include 51 cases marked as customers of both utilities.

Geographic information available for education and outreach events and media are limited to the CBO name and IOU service territory present in the program tracking data. The full case assistance tracking data includes CHANGES clients' addresses, however, to preserve clients' privacy, the evaluation team was only provided with case level city, county, and zip code information. Figure 4-14 shows the distribution of CHANGES case activity by county.

FIGURE 4-14: MAP OF AVERAGE YEARLY NUMBER OF CHANGES SERVICE CASES, 2022-2024
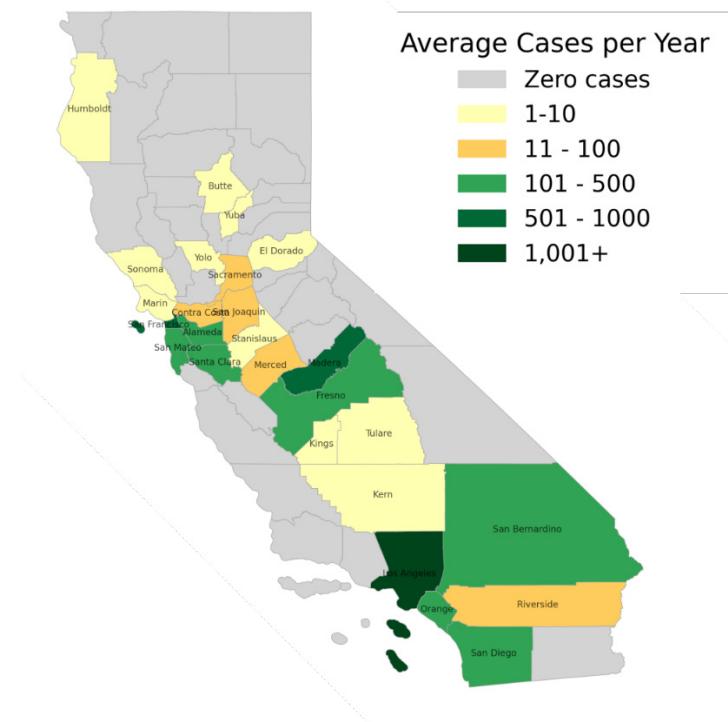
While maps help visualize the geographic distribution of services, reviewing this same data in tabular form helps to highlight multiple important metrics in detail. Table 4-15 shows the average number of cases per year (2022-2024) in each county, along with the number of CBOs serving that county. CBOs self-report the counties they service in program contract materials. However, CBOs often completed cases for individuals that reside outside of their self-reported served counties.

Table 4-15 shows both the self-reported[23] number of CBOs who serve each county, and the number of CBOs that appear to serve a given county based on case entry tracking data. Los Angeles County represents both the most CBOs and the most cases. Overall, there are 14 counties which average at least 10 cases per year. There are eight counties that CBOs self-report providing service to, but no case activity occurred in between 2022 and 2024 (Napa, Lake, Mendocino, Monterey, San Benito, Santa Cruz, Solano, and Ventura). Suscol Intertribal Council (SIC) self-reported providing CHANGES services in Lake, Mendocino, and Napa counties, however as shown previously (see Table 4-3), SIC participates in the CHANGES Program exclusively through educational events and provides little to no case assistance in these counties. Chinese Newcomers Service Center self-reported providing services in counties across the San Francisco Bay Area (which includes Napa and Solano), however 99% of their case activity took place only in San Francisco County. El Concilio of San Mateo County self-reported service in Monterey, San Benito, and Santa Cruz, however 99% of their cases take place in San Mateo. Finally, IILA self-reported service in Ventura County, but 97% of their cases took place in Los Angeles County. There are 24 additional counties in California that are not currently served by any CHANGES CBOs.[24] Throughout the remainder of this section, we will define CBO service boundaries by the locations that case assistance took place.

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[23]   The CBO's self-reported service areas are listed in a document provided to the evaluation team by the CPUC.

[24] Alpine, Amador, Calaveras, Colusa, Del Norte, Glenn, Imperial, Inyo, Lassen, Mariposa, Modoc, Mono, Nevada, Placer, Plumas, San Luis Obispo, Santa Barbara, Shasta, Sierra, Siskiyou, Sutter, Tehama, Trinity, and Tuolumne.

TABLE 4-15: NUMBER OF CBO SERVING EACH COUNTY (BASED ON SELF-REPORTS AND CASE ACTIVITY) AND AVERAGE YEARLY CASES, 2022-2024

County	Self-Report # CBOs	# CBOs (Case Activity)	Avg # Cases/Year
Los Angeles	7	8	1,515
San Francisco	4	3	756
Madera	3	3	714
San Mateo	4	6	494
San Bernardino	3	6	480
San Diego	3	5	463
Fresno	2	3	421
Orange	4	8	340
Alameda	6	8	195
Santa Clara	6	7	170
Sacramento	2	2	65
San Joaquin	3	5	34
Riverside	2	5	17
Contra Costa	3	5	12
Tulare	0	2	5.3
Merced	1	4	4.7
Kern	1	2	3.7
Yolo	1	1	2.7
Stanislaus	2	2	2.7
Marin	1	1	1.7
Kings	0	1	1.0
Butte	0	1	0.7
Sonoma	2	1	0.7
El Dorado	0	1	0.3
Yuba	0	1	0.3
Humboldt	1	1	0.3
Napa	2	0	0.0
Lake, Mendocino, Monterey, San Benito, Santa Cruz, Solano, Ventura	1	0	0.0

4.5.3   Areas of need

To determine whether CHANGES CBO coverage is currently adequate to address the needs of the population, we incorporated a few external data sources to quantify areas of need. First, we looked at the number of limited English-speaking (LEP) households by county in 2023 as reported by the Census

Bureau's American Communities survey.[25] There are an estimated 1.12 million LEP households in California, representing 8.3% of total California households. Of those 1.12 million LEP households, 834,423 (75%) are in one of the CHANGES Program electric IOU service territories and 1,098,920 (98%) are in CHANGES Program gas IOU service territories (based on census tract level data). We also incorporated an estimate of the average household energy burden within the county based on census-tract level data from the DOE LEAD tool. Per the DOE website, a household with 6% or greater energy burden is considered to be a high energy burden household.

Service Levels by County

Table 4-16 presents the number of LEP households by county, for those with at least 20,000 LEP households. These 13 counties represent 83% of LEP households in CHANGES electric IOU service territories and 84% of LEP households in CHANGES gas IOU service territories in California. By itself, Los Angeles County accounts for 26% of electric IOU territory and 36% of gas IOU LEP households in California. The table also shows the average number of cases per year (during calendar years 2022 to 2024), and the number of LEP households per case. A higher number of LEP households per case suggest the LEP population in that county might be underserved. With over 1,000 LEP households per case, Riverside, Kern, and Contra Costa counties may be underserved within California. Households in Riverside and Kern also have higher average energy burdens (>3%). There are also over 1,000 LEP households per case in Orange County, when considering only gas cases; However, the electric service levels in Orange County appear adequate. Sacramento county also presents over 1,000 LEP households per electric case, however the number of IOU electric service LEP customers in Sacramento is relatively smaller than others in this table (under 5,000 as many of these customers get their electricity from SMUD). While households in Fresno have a higher energy burden, CHANGES service levels are adequate within the county (<100 LEP households per case).

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[25] S1602 Limited-English Speaking Households, 5-year estimate 2023, county level

TABLE 4-16: LIMITED ENGLISH-SPEAKING HOUSEHOLDS AND CASE ACTIVITY BY COUNTY BY GAS AND ELECTRIC SERVICE TERRITORY (>20,000 LEP HOUSEHOLDS)

County	Electric Cases/Yr*	Gas Cases/Yr*	Electric LEP HHs	Gas LEP HHs	Electric # LEP HHs/Case	Gas # LEP HHs/Case	Avg. Energy Burden
Los Angeles	428	1,096	217,408	400,281	508	365	2.0%
Orange	275	66	82,564	88,263	301	1,337	1.6%
San Diego	461	228	68,539	68,715	149	301	1.9%
Santa Clara	162	87	67,193	68,175	414	784	1.2%
Alameda	194	118	48,340	50,010	249	424	1.5%
San Francisco	744	364	37,451	37,451	50	103	1.0%
San Bernardino	384	96	36,782	30,953	96	321	2.9%
Riverside	11	6	32,909	49,744	3,085	8,291	3.1%
Fresno	420	352	26,561	26,561	63	75	3.9%
Kern	3	2	25,063	24,848	7,519	14,909	4.2%
Contra Costa	12	11	23,589	23,589	1,966	2,081	2.0%
San Mateo	492	394	21,651	21,651	44	55	1.2%
Sacramento	2	64	4,298	37,016	2,149	578	2.2%

* Some cases are listed as both electric service and gas service cases.

**Counties with more than 1,000 LEP households per case, at least 5,000 households, and Average Energy Burden of at least 2% are shaded in green

To determine which languages would be most beneficial in these Riverside, Kern and Contra Costa counties (if new CBOs were added in these regions), we reviewed the total population of limited English-speakers in those counties by language. Table 4-17 shows the top languages spoked in Riverside, Kern, and Contra Costa counties for the population of individuals 5 years and older that speaks English less than "very well", as reported in the 2023 American Communities Survey.[26] Riverside and Kern Counties are predominantly Spanish Speaking Counties. Contra Costa consists primarily of Spanish, Chinese, other Indo-European Languages, and Tagalog.

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[26]   C16001: Language Spoken at Home for the Population 5 years and over (2023 5-year Estimate)

TABLE 4-17: TOP LANGUAGES SPOKEN BY LEP POPULATION IN COUNTIES UNDERSERVED BY CHANGES

Language	Riverside		Kern		Contra Costa	
	# LEP	% of Total	# LEP	% of Total	# LEP	% of Total
Spanish	266,554	81.1%	130,855	89.1%	84,059	55.3%
Chinese (incl. Mandarin, Cantonese)	12,803	3.9%	1,602	1.1%	18,400	12.1%
Other Indo-European languages[27]	10,829	3.3%	3,818	2.6%	15,129	9.9%
Tagalog (incl. Filipino)	11,349	3.5%	3,445	2.3%	9,188	6.0%
Other Asian/Pacific Island languages[28]	5,436	1.7%	2,197	1.5%	7,901	5.2%
Vietnamese	8,054	2.5%	1,144	0.8%	5,106	3.4%

We also reviewed the LEP population and case activity in counties with 5,000 to 20,000 LEP households (Table 4-18). These eleven counties make up an additional 13% of the total electric service LEP households and 12% of the total gas service LEP households in California (the remaining 34 California counties represent 4% of total electric service LEP households and 3% of total gas service LEP households). Households within five of these counties have average energy burdens greater than 3% (Tulare, San Joaquin, Imperial, Merced, and Kings). San Joaquin appears to receive adequate levels of service from the CHANGES Program (<1,000 LEP Households per case), while the other counties with high average energy burdens do not. Tulare is the county with the largest service gap; it has over 15,000 LEP households, a high average energy burden, and low service levels.

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[27] "Other Indo-European languages" includes (but not limited to) Italian, Portuguese, Greek, Armenian, Persian (incl. Farsi, Dari), Gujarati, Hindi, Urdu, Punjabi, Bengali, Nepali, Marathi, or other Indic languages.

[28] "Other Asian and Pacific Island languages" includes (but not limited to) Japanese, Hmong, Khmer, Thai, Lao, or other Tai-Kadai languages, Telugu, Tamil, Malayalam, Kannada, or other Dravidian languages, Ilocano, Samoan, Hawaiian, or other Austronesian languages, Burmese, Karen, Turkish, Uzbek, or other languages of Asia.

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TABLE 4-18: LIMITED ENGLISH-SPEAKING HOUSEHOLDS AND CASE ACTIVITY BY COUNTY BY GAS AND ELECTRIC SERVICE TERRITORY (5,000-20,000 LEP HOUSEHOLDS)

County	Avg. Cases / Yr	Electric LEP HHs	Gas LEP HHs	Average Energy Burden
San Joaquin	34.3	18,191	19,264	3.2%
Tulare	5.3	18,820	18,820	3.9%
Ventura	0	15,849	15,849	1.8%
Monterey	0	14,491	14,491	2.2%
Stanislaus	2.7	2,317	12,478	2.7%
Imperial	0	167	12,239	3.8%
Merced	4.7	6,576	11,769	3.2%
Santa Barbara	0	8,864	9,376	1.7%
Solano	0	8,457	8,457	2.3%
Sonoma	0.7	7,786	7,786	2.1%
Kings	1.0	5,651	5,651	3.8%

*Counties with an Average Energy Burden greater than 3% and more than 1,000 LEP households per case are shaded in green

Interestingly, while Madera County only has 3,982 gas and electric LEP households (<0.5% of total LEP households) and is therefore excluded in the above tables, there are an average of 714 cases per year in that county (two CBOs in the CHANGES network primarily focus on serving Madera County). Though households in Madera have a higher average energy burden (3.6%), it is unclear why this county is singled out for service and not others with higher populations and similar (or worse) energy burden levels.

CA Prevalent Languages by County

As shown in Table 4-4 in the prior section, the top five spoken languages in California by those who speak English less than "Very Well" are: Spanish, Chinese (including Mandarin and Cantonese), Vietnamese, Tagalog (including Filipino), and Korean. Collectively, these languages make up 85.6% of the total population in California that speak English less than "very well". For these five languages, we explored the counties had the highest population of limited English-speakers (LES) based on the Census Bureau's 2023 American Communities Survey.[29] The following tables present the average annual number of in-language cases by county, for the counties that make up at least 80% of the total LEP population that speak the given language. The table also includes the average energy burden, which is calculated as the average of the census tract level average energy burdens weighted by the language-specific LEP population.

Spanish is the most spoken language by the California LEP population. Table 4-19 shows the 12 counties that make up 80% of total LEP Spanish speakers within CHANGES IOU service territories. Spanish CHANGES services provided in Riverside, Kern, Tulare, Alameda, Monterey, and Ventura counties is very low (>4,000

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[29] C16001: Language Spoken at Home for the Population 5 years and over (2023 5-year Estimate)

LEP people per case). Amongst these counties with low service levels, the counties with the highest average energy burdens are Kern and Tulare (>3%).

TABLE 4-19: SPANISH CASES AND POPULATION BY COUNTY (TOP 80% LEP SPANISH POPULATION)

County	Spanish Cases	% of Total Spanish Cases	Spanish LEP Population	% of Total Spanish LEP Population	# LEP People per Case	Avg. Energy Burden
Los Angeles	458.4	20.7%	1,453,513	36.0%	3,170.9	2.3%
Riverside	11.0	0.5%	272,680	6.8%	24,853.5	2.9%
Orange	189.1	8.5%	269,453	6.7%	1,425.2	1.7%
San Diego	173.0	7.8%	256,024	6.3%	1,479.9	2.0%
San Bernardino	96.6	4.4%	217,269	5.4%	2,249.5	2.9%
Kern	4.0	0.2%	136,008	3.4%	33,826.1	4.1%
Santa Clara	147.5	6.6%	125,333	3.1%	849.9	1.4%
Fresno	268.4	12.1%	104,715	2.6%	390.1	4.0%
Tulare	7.5	0.3%	100,672	2.5%	13,395.1	3.8%
Alameda	1.3	0.1%	98,695	2.4%	74,019.4	1.9%
Monterey	0.0	0.0%	97,465	2.4%	NA	2.2%
Ventura	0.0	0.0%	95,301	2.4%	NA	1.8%

*Counties with an Average Energy Burden greater than 3% are shaded in green.

Chinese is the second most common spoken language by the California LEP population. Table 4-20 includes the six counties that make up over 80% of total LEP Chinese speakers. CHANGES coverage in Los Angeles and San Francisco appears adequate (<1,000 LEP people per case), however Chinese service in the remaining highly populated LEP Chinese-speaking counties is very low (Santa Clara, Alameda, Orange, and San Mateo). The average energy burden of the census tracts in the areas populated by LEP Chinese speakers are relatively low (<2%), suggesting there is a lower level of need amongst this population.

TABLE 4-20: CHINESE (MANDARIN AND CANTONESE) CASES AND POPULATION BY COUNTY (TOP 80% LEP CHINESE POPULATION)

County	Chinese Cases	% of Total Chinese Cases	Chinese LEP Population	% of Total Chinese LEP Population	# LEP People per Case	Avg. Energy Burden
Los Angeles	246.9	32.4%	219,819	33.1%	890.4	1.9%
Santa Clara	0.7	0.1%	80,618	12.1%	120,927.0	1.0%
San Francisco	455.9	59.8%	77,787	11.7%	170.6	1.1%
Alameda	5.0	0.7%	75,923	11.4%	15,070.6	1.4%
Orange	2.0	0.3%	49,953	7.5%	25,333.7	1.4%
San Mateo	14.8	1.9%	33,321	5.0%	2,257.8	1.2%

Vietnamese is the third most common spoken language by the California LEP population. Table 4-21 includes the five counties that make up over 80% of total LEP Vietnamese speakers. Coverage in Orange

County appears adequate (<1,000 LEP people per case), however Vietnamese service in the remaining highly populated LEP Vietnamese-speaking counties is very low. The average energy burden of the census tracts in the areas populated by LEP Vietnamese speakers are relatively low (<2.5%), suggesting there is a lower level of need amongst this population.

TABLE 4-21: VIETNAMESE CASES AND POPULATION BY COUNTY (TOP 80% LEP VIETNAMESE POPULATION)

County	Vietnamese Cases	% of Total Vietnamese Cases	Vietnamese LEP Population	% of Total Vietnamese LEP Population	# LEP People per Case	Avg. Energy Burden
Orange	125.0	25.8%	111,522	33.6%	892.2	1.7%
Santa Clara	4.0	0.8%	70,849	21.3%	17,715.4	1.4%
Los Angeles	6.8	1.4%	51,044	15.4%	7,481.4	2.1%
San Diego	0.0	0.0%	22,896	6.9%	NA	1.8%
Sacramento	0.0	0.0%	17,584	5.3%	NA	2.2%

Tagalog is the fourth most common spoken language by the California LEP population. Below is a table showing the same for Tagalog. This table includes the 11 counties that make up over 80% of total LEP Tagalog speakers. There is no significant service in Tagalog in any county. The average energy burden of the census tracts in the areas populated by LEP Vietnamese speakers are relatively low (<3%), suggesting there is a lower level of need amongst this population.

TABLE 4-22: TAGALOG CASES AND POPULATION BY COUNTY (TOP 80% LEP TAGALOG POPULATION)

County	Tagalog Cases	% of Total Tagalog Cases	Tagalog LEP Population	% of Total Tagalog LEP Population	# LEP People per Case	Avg. Energy Burden
Los Angeles	0.7	8.7%	70,111	28.0%	105,161	1.9%
San Diego	5.7	73.9%	29,661	11.8%	5,234	1.8%
Alameda	0.0	0.0%	16,949	6.8%	NA	1.5%
Santa Clara	0.0	0.0%	16,834	6.7%	NA	1.3%
San Mateo	0.1	0.7%	15,663	6.3%	274,950	1.3%
Orange	0.0	0.0%	13,765	5.5%	NA	1.6%
Riverside	0.0	0.0%	12,040	4.8%	NA	2.3%
Solano	0.0	0.0%	9,975	4.0%	NA	2.2%
Sacramento	0.0	0.0%	9,700	3.9%	NA	2.0%
Contra Costa	0.0	0.0%	9,525	3.8%	NA	2.0%
San Joaquin	0.0	0.0%	9,416	3.8%	NA	2.8%

Korean is the fifth most common spoken language by the California LEP population. Table 4-23 includes the four counties that make up over 80% of total LEP Korean speakers. Service levels in Los Angeles County

appear adequate (<1,000 LEP people per case), however Korean service in Orange County is very low. The average energy burden of the census tracts in the areas populated by LEP Korean speakers are very low (<2%), suggesting there is a lower level of need amongst this population.

TABLE 4-23: KOREAN CASES AND POPULATION BY COUNTY (TOP 80% LEP KOREAN POPULATION)

County	Korean Cases	% of Total Korean Cases	Korean LEP Population	% of Total Korean LEP Population	# LEP People per Case	Avg. Energy Burden
Los Angeles	141.8	51.0%	90,245	46.9%	636.5	1.6%
Orange	9.5	3.4%	45,829	23.8%	4,825.5	1.5%
Santa Clara	112.2	40.4%	12,089	6.3%	107.7	1.0%
San Diego	0.0	0.0%	8,094	4.2%	NA	1.4%

4.6   FUNDING ANALYSIS

CHANGES was formalized through CPUC Decision 15-12-047 "as an ongoing statewide program, effective January 1, 2016" with a funding level "not to exceed $1.75 million annually."[30] In 2021, the CARE proceeding (A.19-11-003) extended CHANGES funding through Decision 21-06-015, allocating $10,515,012 to support the program from 2021 through 2026 (roughly $1.75 million/year). The annual budget has not been adjusted for inflation nor wage increases, since its establishment in 2016.

4.6.1   CHANGES Program Budget and Spending

From June 2019 through June 2024, the CHANGES prime contractor was Self-Help for the Elderly (SHE). Starting in July 2024, International Institute of Los Angeles (IILA) took over as the prime contractor for the program. The prime contractor holds the contract with the CPUC and is responsible for disseminating those funds to the CBO network, Milestone Consulting, to other subcontractors and for other remaining program costs. Aside from the cost of program evaluation, all program funds are spent through the contract with the prime contractor. Note that while funding through the CARE proceeding is determined annually by calendar year, the CHANGES Program years (and budget years) run on an alternate cycle. During the SHE contract program years, the program ran from June to May (aside from the final year of the contract, program year 2023-2024 (PY 23/24), which ran for 13 months from June to June). As of the start of IILA's contract, program year 2024-2025 (PY 24/25), the program now runs from July through the end of June.

Table 4-24 below shows the annual program budget and spending for the six program years running from June 2019 through June 2025. The annual budgets shown here reflect the amounts stated in the individual

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[30] D.15-12-047 (https://docs.cpuc.ca.gov/PublishedDocs/Published/G000/M387/K107/387107687.PDF)

contracts with SHE and IILA. The PY 23/24 budget also includes an additional $100k amendment that was signed with SHE when PY 23/24 was extended through the end of June 2024. Note that in the last two years of SHE's contract (PY 22/23 and PY 23/24), the annual budgets were lower than prior years. This was due to the 2021 CARE decision ordering funds for CHANGES evaluations to be paid out of the $1.75M CHANGES annual budget. At that time, PY 22/23 and PY 23/24 budgets were reduced by an amount meant to fund the evaluation at approximately $70k per year, or 4% of the total program budget for the 2021-2026 program cycle. The annual program spending reported in this table was shared with the evaluation team by the CPUC. In the first three years of SHE's contract (June 2019 through May 2022), program spending did not exceed the annual budget. According to the prior evaluation, underspending in calendar years 2019-2021 was the result of services affected by COVID.[31] At the end of the PY 21/22, unspent funds totaled $490,302. In the last two years of SHE's contract (PY 22/23 and PY 23/24), demand for the program increased and the program implementer was able to exceed the annual allotted budgets by using unspent funds rolled over from the prior contract years.[32] At the start of IILA's contract (PY 24/25), the annual budget was down to $1.68M and no additional funds were available. In practice, the CHANGES Program was allowed to spend $1.74M and $1.91M in the last two years of SHE's contract but were limited to only $1.68M in PY24/25. From the perspective of the CBOs and subcontractors, there was (effectively) a budget cut in PY 24/25 when compared with the two prior years. Overall, the program was allowed to spend $224k less (12%) in PY 24/25 than the prior year.

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[31] CHANGES Program Process Evaluation Study (2019-2021), Opinion Dynamics. (https://www.cpuc.ca.gov/-/media/cpuc-website/divisions/news-and-outreach/reports/cab/changes/changes-evaluation-report-2023.pdf)

[32] State contract rules allow unspent funds from the previous two years to be spent in the current year. Unspent funds in a certain year can be rolled over to future years and funds are rolled over every year. Effectively unspent funds kept rolling over from the start of the contract. Prior to PY 24/25, the CHANGES Program was able to use unspent funds from the previous two years to be spent in the current year under State contracting rules. The new program contract beginning PY 24/25 no longer allows for fund shifting between program years. Note that State contracting rules are separate from CARE Program fund shifting rules, which does not allow fund shifting between program years (D.21-06-015).

TABLE 4-24: CHANGES BUDGET AND SPENDING BY YEAR (JUNE 2019 THROUGH JUNE 2025)

Program Year	Total Budget	Total Program Spending	Remaining
SHE Year 1 (PY 19/20)	$1,750,000	$1,615,597	$134,403
SHE Year 2 (PY 20/21)	$1,750,000	$1,528,404	$221,596
SHE Year 3 (PY 21/22)	$1,750,000	$1,615,697	$134,303
SHE Year 4 (PY 22/23)	$1,586,639	$1,740,047	-$153,408
SHE Year 5 (PY 23/24)*	$1,600,000	$1,906,455	-$306,455
IILA Year 1 (PY 24/25)	$1,682,289	$1,659,060	$23,229

*PY 23/24 ran for 13 months from June 2023 to June 2024

Since budgets were exceeded in PY 22/23 and PY 23/24, it's not very informative to review the originally allocated budgets by organization, since they were allowed to exceed these by-organization budgets to varying degrees (without detailed documentation). Instead, we reviewed program spending by organization and program year to understand trends over time. Table 4-25 shows program spending by organization and program year, based on spending summary tables that are included in the end-of-year invoices. The CBO-network accounted for the largest portion of program spending, receiving 56% to 60% of program funds. Milestone Consulting received the next largest portion, 20% to 22% of program funds, followed by the prime contractor (SHE or IILA), receiving 15% to 18% of total program funds. In PY 22/23 and PY 23/24, when the effective spending budget was higher due to unspent funds from prior contract years, the CBOs spent $1.04M and $1.13M, respectively. As discussed, PY 24/25 was budget constrained for case assistance due to changes in reimbursement rates, and the CBOs now had a budget of $925.5k, or 18.4% less than was available the prior program year (over $200k less than the prior year, as there was no longer an opportunity to roll over unspent funds in PY 24/25).

TABLE 4-25: CHANGES SPENDING BY ORGANIZATION AND PROGRAM YEAR

Organization	PY 21/22	PY 22/23	PY 23/24*	PY 24/25
CBOs	$908,205.01	$1,041,271.43	$1,134,342.13	$925,535.00
SHE	$282,033.55	$265,126.63	$295,000.00	--
IILA	--	--	--	$247,500.09
Milestone Consulting	$353,385.00	$366,639.00	$376,317.00	$339,250.00
Database Maintenance**	$11,956.00	$14,340.00	$48,729.00	$81,750.00
Sign Language Interpreter	$750.00	--	--	--
DVBE***	$52,458.50	$52,670.00	$51,962.50	$65,025.32
Total	**$1,608,788.06**[33]	**$1,740,047.06**	**$1,906,350.63**[34]	**$1,659,060.41**

* PY 23/24 ran for 13 months from June 2023 to June 2024
**Database Maintenance was outsourced to Streamline Social in PY21/22-PY 23/24 and IT-TC Consulting in PY 24/25
*** Promotional products were sourced from a Disabled Veteran Business Enterprise (DVBE). In PY 21/22-PY 23/24 this was VIRTEK Company and in PY 24/25 this was DVE Global Marketing Inc.

Since the detailed PY 24/25 budget was not adjusted outside of the original contract terms, we are able to compare PY 24/25 spending to that year's detailed budget. Table 4-26 shows the funds remaining at the end of PY 24/25, by organization. In PY 24/25 both the CBO-network and Milestone Consulting exhausted all funds available to them. IILA ended the year with $20k of unspent funds. These funds were budgeted for "Other Contractor Costs" (including training, printing, and other expenses). The portion of IILA's budget allocated to personnel costs was completely spent ($229k).

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[33] There is a discrepancy in total program spending between the year-to-date summary table by organization shown in the last invoice of the PY 21/22 Program Year ($1,608,788.06) and the total per the Retention Invoice ($1,615,696.86).

[34] There is a discrepancy in total program spending between the year-to-date summary table by organization shown in the last invoice of the PY 23/24 Program Year ($1,905,350.63) and the total as communicated by email to the evaluation team by the CPUC ($1,906,455).

TABLE 4-26: PY 24/25 BUDGET COMPARED TO SPENDING BY ORGANIZATION

Organization	PY 24/25 Budget	PY 24/25 Spending	Funds Remaining
CBOS	$925,500.00	$925,535.00	-$35.00
IILA	$267,664.00	$247,500.09	$20,163.91
Milestone Consulting	$339,250.00	$339,250.00	$0.00
IT - TC Consulting*	$81,875.00	$81,750.00	$125.00
DVBE**	$68,000.00	$65,025.32	$2,974.68
Total	**$1,682,289.00**	**$1,659,060.41**	**$23,228.59**

*IT-TC Consulting was responsible for database maintenance in PY 24/25

** Promotional products were sourced from a Disabled Veteran Business Enterprise (DVBE), in PY 24/25 this was DVE Global Marketing Inc.

Reviewing the trend in spending from PY 21/22 through PY 24/25, we can see that demand for CHANGES services dramatically increased in PY 22/23, and CBOs were able to provide an increased level of assistance during PY 22/23 and PY 23/24 (due to unspent funds in prior years). When the program budget was reduced in PY 24/25, the CBOs maxed out the budget available to them (as did Milestone Consulting). These findings align with the feedback we heard during interviews with the CBOs, Milestone Consulting, and IILA about program funding levels. During our interviews, many CBOs reported completing program activities without receiving compensation due to budgetary constraints (nine CBOs reported completing uncompensated dispute and needs assistance activities, ten CBOs reported uncompensated outreach activities, and six CBOs reported uncompensated educational events).

4.6.2   CBO Spending by Activity

CBO activities (including Education, Outreach, and Case Assistance) constitute the primary program delivery mechanism, accounting for 56% to 60% of program funds. Table 4-27 below shows CBO expenditure by spending category and program year. In PY 21/22 through PY 23/24 the core program delivery activities made up 98% of CBO spending (the remaining 2% was spent on a once-a-year mandatory training session). In PY 24/25 additional funds were set aside from the CBO budget for Human Interest stories and Trends Analysis, leaving 95% of the CBO budget for primary program delivery activities. We can see in Figure 4-15 that the Case Assistance portion of spending increased from 56% in PY 21/22 to 67% in PY 24/25. This is primarily due to increased case assistance reimbursement rates that went into effect in PY 24/25 (discussed in more detail below).

TABLE 4-27: CBO SPENDING BY CATEGORY AND PROGRAM YEAR

CBO Spending Category	PY 21/22	PY 22/23	PY 23/24*	PY 24/25
Education	$286,180	$348,771	$377,617	$206,785
Outreach	$91,500	$96,000	$95,000	$45,250
Case Assistance	$504,525	$571,500	$631,875	$624,300
Mandatory Training	$26,000	$25,000	$24,000	$24,000
Human Interest	$0	$0	$0	$2,200
Trends Analysis	$0	$0	$0	$23,000
Total	**$908,205**	**$1,041,271**	**$1,128,492**	**$925,535**

* PY 23/24 ran for 13 months from June 2023 to June 2024

FIGURE 4-15: CBO SPENDING BY CATEGORY AND PROGRAM YEAR
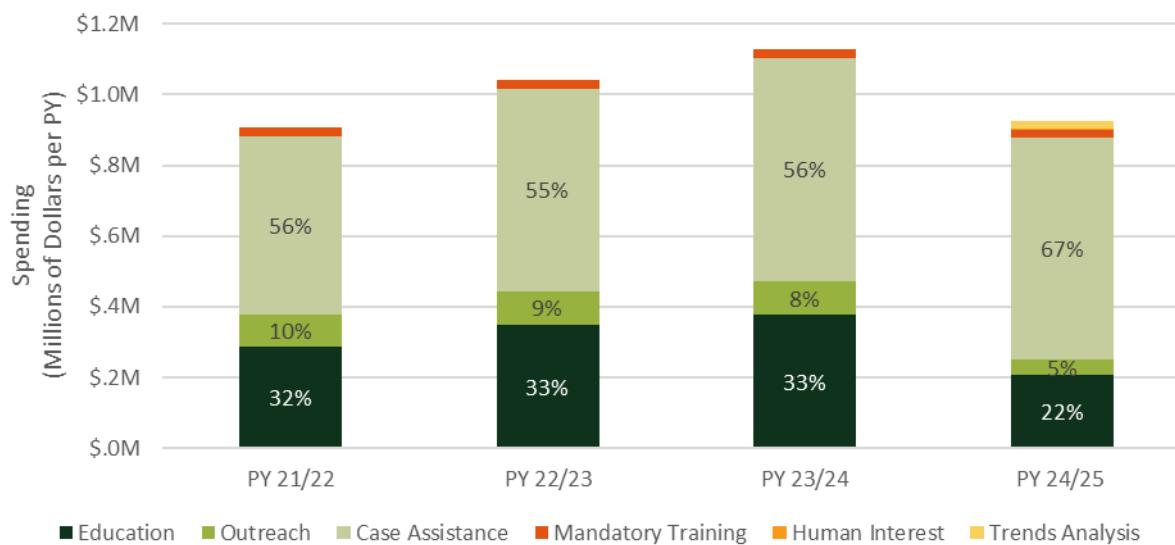
Spending on education, outreach, and case assistance is tracked by specific activity types (see Table 4-28 and Figure 4-16 below). Most education spending is for education sessions with only a small proportion spent on education evaluations (a.k.a., knowledge assessments). Outreach activities include media placement, special outreach projects, community events and presentations, and social media postings. In PY 24/25, when outreach activities were restrained by budget, the majority of outreach funds were spent on community events and presentations. Case assistance includes both dispute resolution and needs assistance, with most funding going towards needs assistance.

TABLE 4-28: CBO SPENDING ON EDUCATION, OUTREACH, AND CASE ASSISTANCE BY BUDGET YEAR

Category	Sub-Category	PY 21/22	PY 22/23	PY 23/24*	PY 24/25
Education	Education Session (clients)	$281,480	$340,800	$362,460	$200,700
	Education Evaluation (clients)	$4,700	$7,971	$15,157	$6,085
Outreach	Media Placement	$27,000	$30,000	$18,000	$8,000
	Special Outreach Project	$10,000	$8,000	$6,000	$3,750
	Community Event/ Presentation	$31,000	$41,000	$50,500	$25,000
	Social Media (posting)	$23,500	$17,000	$20,500	$8,500
Case Assistance	Disputes (cases)	$74,250	$97,500	$103,650	$126,800
	Needs Assistance (cases)	$430,275	$474,000	$528,225	$497,500

*PY 23/24 ran for 13 months from June 2023 to June 2024

FIGURE 4-16: CBO SPENDING ON EDUCATION, OUTREACH, AND CASE ASSISTANCE BY BUDGET YEAR
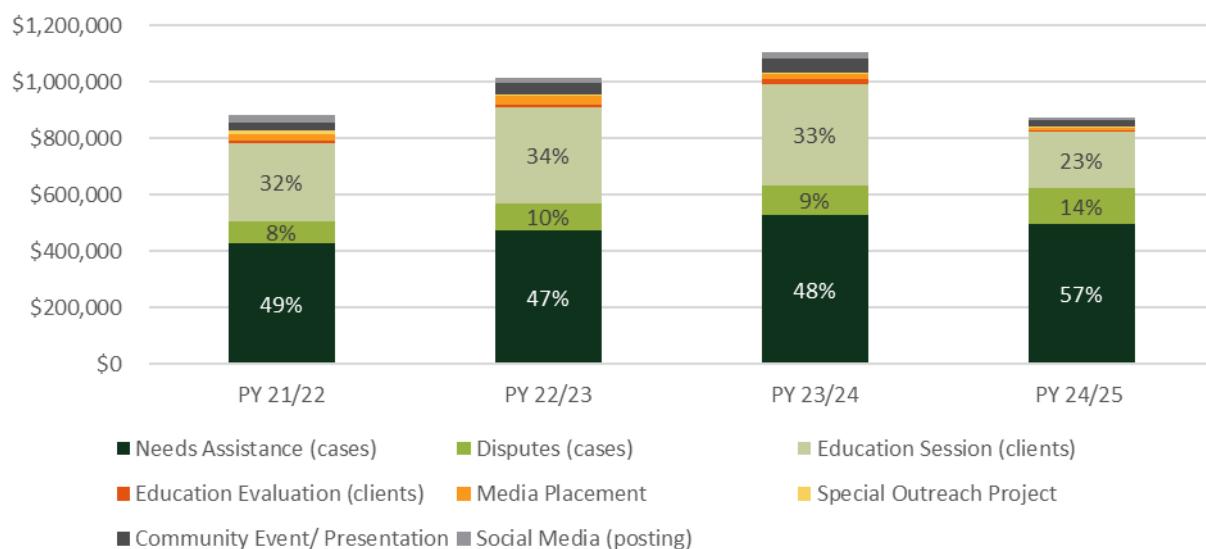
4.6.3   Spending per CBO

Each CBO has a different level of involvement and specializes in different activities. Funds are re-allocated part-way through the year to ensure that CBOs with higher needs (e.g., more cases) receive a higher proportion of the budget. The reallocation process involves IILA and Milestone Consulting reviewing the performance of all CBOs and identifying which CBOs are running low on funds or have exceptionally high demand. They then set new allocations in alignment with their review. Funds are then re-distributed based on these assessments.

The following table shows the current CBO reimbursement rates by activity type. At the start of the program year each CBO is allocated an equal amount of the overall CBO program budget ($35,200 at the

start of PY 24/25). This initially allocated amount per CBO added up to $880,000 across 25 CBOs (95% of the CBO budget). As shown below, a portion of each CBO's budget is set aside for education and post-session evaluations ($10,975), outreach ($4,000), complaint resolution cases ($10,000) and needs assistance cases ($8,125), and other activities ($2,100). As spending progresses throughout the year, some CBOs spend at a faster rate than others. As individual CBO's spending hits up against the allocated budget (i.e., $35,200), IILA and Milestone Consulting begin a re-allocation process to increase the allowed expenditures of certain CBOs while decreasing the budget of others. Overall, CBO spending must stay within the total allocated amount but can be shifted and shared fluidly amongst the individual CBOs (in PY 24/25 CBOs as a collective were allocated $925,500 in total). As CHANGES funding is set at the program level, this approach only works because of the collaborative nature of the CBOs within the program and the willingness of CBOs to share funds to ensure CBOs who are doing more case assistance work can get paid for this work. Despite this reallocation process, many CBOs reported doing unpaid CHANGES activities (as mentioned previously).

TABLE 4-29: CURRENT CBO REIMBURSEMENT RATES AND STARTING BUDGET PER CBO (PY 24/25)

Activity	Current Rate	Total Budget per CBO (Units)	Total Budget per CBO (Amount)
Education Session (per client)	$10	1,000	$10,000
Education – Evaluation (per client)	$5	195	$975
Outreach - Media Placement	$1,000		
Outreach - Special Outreach Project	$1,250		
Outreach - Community Event/Presentation	$500	Varies	$4,000
Outreach - Presentation	$375		
Outreach - Social Media	$500		
Complaint Resolution	$200	50	$10,000
Needs Assistance	$125	65	$8,125
Mandatory Training	$1,000	1	$1,000
Human Interest	$100	1	$100
Trend Analysis	$1,000	1	$1,000
Total Budget per CBO (PY 24/25)			**$35,200**

The following table shows the monthly CBO spending on education, outreach, and case assistance in PY 24/25. The table is presented as a heatmap, where darker shaded cells correspond with higher dollar amounts. At the start of PY 24/25, each CBO was allocated $35,200 for the year. During the program year, spending started off strong across all categories and CBO's budgets were quickly spent. In November 2024, there were two CBOs that exceeded the original $35,200 budget. By December, five CBOs had hit up against the $35,200 threshold. Around that time, the CHANGES administrators asked the CBOs to slow down their spending on outreach and education, funneling those remaining funds to serve case assistance. Throughout the program year, program administrators take time to meet with all of the CBOs

to determine which organizations needed more funds and which would be able to operate with less. Even with funds funneled into case assistance from other spending categories, it is clear that there is unmet demand for additional case assistance services that was constrained by the program's budget.

TABLE 4-30: PY 24/25 MONTHLY CBO SPENDING FOR EDUCATION, OUTREACH, AND CASE ASSISTANCE

Month	Education		Outreach				Case Assistance		
	Education Session	Education Evaluation	Media Placement	Social Media	Community Event	Presentation	Special Outreach Projects	Needs Assistance	Disputes
Jul-24	$26,330		$1,000	$1,000	$3,000	$1,500		$50,375	$8,200
Aug-24	$33,310		$1,000	$2,000	$5,000	$500		$61,625	$11,200
Sep-24	$20,430			$1,500	$4,500	$1,000		$49,000	$9,600
Oct-24	$23,560	$600	$2,000	$1,500	$2,500			$52,750	$10,200
Nov-24	$30,640	$2,385	$1,000	$1,000	$5,500			$41,375	$12,600
Dec-24	$16,360	$1,335	$3,000	$500	$1,000		$1,250	$25,125	$12,400
Jan-25	$17,540	$1,025		$500			$2,500	$34,250	$10,400
Feb-25	$10,330	$160						$62,750	$11,000
Mar-25	$8,740	$235						$51,750	$19,600
Apr-25	$11,290	$195						$41,875	$15,800
May-25	$80	$40						$22,250	$3,800
Jun-25	$2,090	$110		$500	$500			$4,375	$2,000

At the end of PY 24/25 the level of spending by CBO varied widely. If all 25 CBOs had been allocated funds equally, they would have each received up to $37,000 in PY 24/25. As discussed previously, one of the 25 CBOs had no activity in PY 24/25 (Pilipino Workers Center of Southern California). Amongst the remaining CBOs, three organizations spent <50% of the originally allocated per CBO budget (Asian Community Center Senior Services, Portuguese Community Center, and Suscol Intertribal Council). By contrast, five organizations spent >150% of their originally allocated budget (Southeast Asian Community Center, Madera Coalition for Community Justice, El Concilio of San Mateo County, Asian-American Resource Center, and International Institute of Los Angeles).

TABLE 4-31: PY 24/25 SPENDING BY CBO

CBO	PY 24/25 CBO Spending	% of PY 24/25 CBO Spending
Southeast Asian Community Center	$75,875	8.2%
Madera Coalition for Community Justice	$68,220	7.4%
El Concilio of San Mateo County	$63,350	6.8%
Asian-American Resource Center	$58,040	6.3%
International Institute of Los Angeles	$55,625	6.0%
Alliance for African Assistance	$50,250	5.4%
Chinese Newcomers Service Center	$48,505	5.2%
Delhi Center	$47,455	5.1%
Asian Pacific Self-Development & Residential Association	$45,950	5.0%
Compass of Madera	$37,500	4.1%
Afghan Coalition	$36,700	4.0%
Chinatown Service Center	$35,605	3.8%
The Fresno Center	$35,235	3.8%
Centro La Familia	$35,225	3.8%
Armenian Relief Society	$33,210	3.6%
Korean American Community Services	$29,550	3.2%
Asian Youth Center	$27,230	2.9%
Casa Familiar	$27,200	2.9%
Koreatown Youth and Community Center	$26,710	2.9%
Little Tokyo Service Center	$25,725	2.8%
Southland Integrated Services	$23,365	2.5%
Asian Community Center Senior Services	$16,825	1.8%
Portuguese Community Center	$13,615	1.5%
Suscol Intertribal Council	$8,570	0.9%
Pilipino Workers Center of Southern California	$0	0.0%
Total PY 24/25 CBO Spending	**$925,535**	**100.0%**

4.6.4   Review of Reimbursement Rates and Funding

As mentioned at the start of this section, the CHANGES Program was established, effective January 1, 2016, with a funding level of $1.75 million per year. The annual program funding level has remained at ~$1.75 million per year since that time. Verdant reviewed consumer price index and wage changes over time, to understand the inflation that took place from 2016 to now. According to the California Employment Development Department (CA EDD), the California Consumer Price Index (CPI) increased from 252.649 in February 2016 to 353.044 in June 2025 (a 39.7% increase).[35] As a measure of wages over that same time period, we reviewed the Mean Annual Wage as reported by the Occupational Employment

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[35]   https://www.dir.ca.gov/oprl/CPI/EntireCCPI.PDF

and Wage Statistics (OEWS) program, also from the CA EDD.[36] The Mean Annual Wage for all occupations in California increased from $56,249 in 2016 Q1 to $81,804 in 2025 Q1 (45.4% increase).

Reimbursement rates for CBO program activities were also established at the program's inception. Recently, in PY 24/25, the reimbursement rates were adjusted in an effort to provide higher compensation levels for case assistance activities. Table 4-32 shows the original and current activity reimbursement rates. The rate for Dispute Resolution increased from $150 to $200, Needs Assistance increased from $75 to $125, and Special Outreach Projects increased from $1,000 to $1,250. At the same time, the reimbursement rate for Outreach Presentations decreased from $500 to $375 and Education Evaluation decreased from $14.29 to $5 per assessment.[37] Table 4-32 also presents the inflation and wage adjusted reimbursement rates (per the inflation findings discussed above). During the CBO interviews, 94% of CBOs stated that the current reimbursement rates did not adequately compensate their organization for their work. We recommend referring to the CPI adjusted and Wage adjusted reimbursement rates presented here to establish updated reimbursement rates aligned with California inflation indices.

TABLE 4-32: CBO REIMBURSEMENT RATES – ORIGINAL, CURRENT, AND ADJUSTED

Activity	Original Rate	Current Rate	Original Rate – CPI Adjusted	Original Rate – Wage Adjusted
Education Session (per client)	$10	$10	$13.97	$14.54
Education – Evaluation (per client)	$14.29	**$5**	$19.97	$20.78
Outreach - Media Placement	$1,000	$1,000	$1,397.37	$1,454.32
Outreach - Special Outreach Project	$1,000	**$1,250**	$1,397.37	$1,454.32
Outreach - Community Event	$500	$500	$698.68	$727.16
Outreach - Presentation	$500	**$375**	$698.68	$727.16
Outreach - Social Media	$500	$500	$698.68	$727.16
Dispute Resolution	$150	**$200**	$209.61	$218.15
Needs Assistance	$75	**$125**	$104.80	$109.07
Mandatory Training	$1,000	$1,000	$1,397.37	$1,454.32

To illustrate the impact on program spending, Table 4-33 shows what the CBO spend would be given the same activity levels, but updated reimbursement rates. Notably, the estimated CBO spending would only have increased by 5.6% to 9.8% in PY 24/25 (as compared to 40% to 46% in prior program years), this is because the case assistance rates had already been increased to equivalent or higher levels. The table also

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[36] https://labormarketinfo.edd.ca.gov/data/oes-employment-and-wages.html#OES

[37] It is our understanding that IILA and Milestone Consulting are working together to create a new method to capture the education evaluation results (instead of the CBOs mailing paper tests to Milestone Consulting for review). The new approach may require more effort from the CBOs to complete, requiring reimbursement rates to be more in line with original levels (adjusted for inflation) than the $5 reduced rate.

includes an estimate of average spending per CBO (note that the number of CBOs varied by year). If activity levels were as high as the first 12 months of PY 23/24, adjusted reimbursement levels would lead to an average budget of $61,383 (CPI Adjusted) to $63,885 (Wage adjusted) per CBO (73% higher than the average $37,020 that was actually spent per CBO in PY 24/25). We know that program activity was constrained in PY 24/25 by the budget, and the activity levels that took place in PY 23/24 are likely a better reflection of current needs for CHANGES services. This would lead to a per-CBO annual budget of $61,400 to $63,900. It should be noted that IILA carefully reviews CBO invoices to ensure the program is only paying for authorized activities and there is precedence in this program to shift funding between CBOs or activities (to ensure program spending is optimized) or to leave program dollars unspent if the need for services is reduced or the CBOs are unable to provide services (such as during the COVID-19 pandemic). Hence, increasing the authorized maximum budget does not mean that the higher budget will be spent but it does allow the CBOs to ensure they can provide compensated case assistance for all CHANGES-eligible customers in need.

TABLE 4-33: ESTIMATED CBO SPENDING WITH ADJUSTED REIMBURSEMENT RATES BY PROGRAM YEAR

Spending Scenarios	Metric	PY 21/22	PY 22/23	PY 23/24*	PY 24/25
Actual	# CBOs	26	26	24	25
	CBO Spending	$908,205	$1,041,271	$1,054,364	$925,535
	Avg. per CBO	$34,931	$40,049	$43,932	$37,021
CPI Adjusted	CBO Spending	$1,268,981	$1,455,041	$1,473,198	$976,995
	% Above Actual	39.7%	39.7%	39.7%	5.6%
	Avg. per CBO	$48,807	$55,963	$61,383	$39,080
Wage Adjusted	CBO Spending	$1,320,708	$1,514,341	$1,533,248	$1,015,788
	% Above Actual	45.4%	45.4%	45.4%	9.8%
	Avg. per CBO	$50,796	$58,244	$63,885	$40,632

*PY 23/24 ran for 13 months from June 2023 to June 2024. Numbers in this table are adjusted to reflect the first 12 months of activity in PY 23/24.

Looking at overall program funding, we can take a similar approach to estimate inflation adjusted budgets by organization. Table 4-34 presents the annual CHANGES budget by organization from PY 24/25 alongside inflation adjusted estimates (adjusted for CPI and Wages). Note that the CBO budget is calculated using activity levels from the first 12 months of PY 23/24 (when program activity was not constrained by budget limitations), and inflation adjusted reimbursement rates. The table also includes an estimated budget per CBO which may be required if additional CBOs are added to the network of CBOs delivering the program. If the CBO network is expanded significantly beyond a network of 25 CBOs, additional program administrative funding (for IILA and Milestone Consulting) may be required to cover increased expenses related to invoicing, training, ongoing technical assistance and CBO support.

TABLE 4-34: ANNUAL CHANGES BUDGET RECOMMENDATION RANGE

Organization	PY 24/25 Budget	CPI Adjusted Estimate	Wage Adjusted Estimate
CBOs (25 CBOs)	$925,500	$1,534,581	$1,597,133
IILA	$267,664	$374,026	$389,269
Milestone Consulting	$339,250	$474,058	$493,378
Database Maintenance*	$81,875	$114,410	$119,072
Promotional Products**	$68,000	$95,021	$98,894
Total	**$1,682,289**	**$2,592,095**	**$2,697,746**
Budget per Additional CBO		**$61,383**	**$63,885**

*IT-TC Consulting was responsible for database maintenance in PY 24/25

** Promotional products were sourced from a Disabled Veteran Business Enterprise (DVBE), in PY 24/25 this was DVE Global Marketing Inc.

5   FINDINGS AND RECOMMENDATIONS

In this section we summarize the key findings presented throughout this report and offer recommendations to increase the future effectiveness of the CHANGES Program. Findings in this section are preceded with a square bullet (■) and recommendations are highlighted with a light green background. Not all findings have an associated recommendation. The findings and recommendations are organized by topical area below.

5.1   BENCHMARKING

This section summarizes the findings, best practices, and recommendations from the Benchmarking Analysis. For each identified best practice, we note whether it is currently part of the CHANGES Program implementation, or whether there is a recommendation to consider incorporating the best practice into the program going forward.

5.1.1   Benchmarking Findings

■ **The CHANGES Program offers a unique, holistic approach to providing utility assistance to LEP customers**. No directly comparable offerings were identified that match all CHANGES Program characteristics. Most similar programs focus on either language access or individualized assistance, but not both. Nationwide, it is rare to find CBO-delivered utility assistance programs focused on areas of support other than just bill forgiveness.

■ **The CHANGES Program encompasses more than simple language translation.** IOU translation services offer limited benefits to LEP customers. They simply translate resources, communications, or offer translators in cases when LEP customers reach out to interact with the utilities. We heard during CBO interviews that IOU translators often do not speak the appropriate dialect or have the technical vocabulary necessary to assist CHANGES Program clients. Beyond translation, the CHANGES Program offers much more to its clients. CHANGES Program CBOs build upon a network of trust within the community, overcoming barriers of distrust and stigma, they offer personal and culturally sensitive engagement, and provide proactive support and services to those in need.

■ **Funding for the CHANGES Program is much lower compared to funding for similar endeavors.** The CBO pilot was awarded a budget of $8.5 million to conduct outreach and arrearage case management services to 12,000 customers over a two-year period. This is in addition to another $1.74 million for administration and IOU supported marketing. During the last two program years, the CHANGES Program provided 13,379 case assistance services and conducted program outreach, educational events, and program administration activities for $3.5 million. This difference in funding suggests that the CHANGES Program is significantly underfunded compared to similar initiatives.

5.1.2   Benchmarking Best Practices

- **Having adequate staff retention and training protocols**. Program success often depends on having adequately trained, bilingual, and bicultural staff for all services, not just translation. Developing intentional hiring, training, and retention strategies, as well as developing protocols to transfer knowledge to newer staff will increase an organization's ability to provide services and build community trust. Staff benefits could include career development pathways to retain these employees and formalize translation and interpretation protocols to ensure consistent quality across channels.

    – **The CHANGES Program employs a multi-cultural network of well-trained CBOs.** The CHANGES Program currently has 24 CBOs that perform utility support in 37 languages. CBO staff attend an annual in-person training event where they receive and review the program's comprehensive training manual. This in-person event also allows CBOs to share challenges they face resolving client issues and importantly also learn from other CBOs tactics to overcome these challenges. In addition to this annual training, the program implementers also meet regularly with the CBOs to provide support throughout the year.

> **Ensure the CHANGES Program is appropriately funded, so that CBOs can adequately compensate staff.** The program's ability to effectively serve CHANGES Program clients is strengthened when staff turnover is minimized. While individual CBO staff retention may be outside of the control of the CHANGES Program, adequate program funding can help CBOs with staff compensation which is an important factor in staff retention.

- **Leveraging community-based outreach.** Effective outreach occurs within communities, through personal, face-to-face interactions, rather than on digital platforms. Partnering with local, trusted organizations, using familiar venues and delivering information in preferred languages and formats increases accessibility, trust, and participation.

    – **The CHANGES Program conducts culturally minded community-based outreach.** CHANGES Program CBOs leverage other service activities within their communities, as well as their status as members of their community, to conduct outreach. In 2024, 21% of CHANGES Program referrals were internal (i.e., they came from a different program or service provided by the CBO), 16% came from in-language and culturally designed education events, and 16% came from community outreach events that often coincided with cultural holidays or community celebrations.

- **Developing strategic partnerships**. Establish relationships with complementary community organizations to enhance program reach and client support. Supplementing outreach activities with referrals may offer substantial mutual benefits through reciprocal referral networks.

    For instance, partnering with organizations that address food security could create a dual benefit: the organization can refer clients to the CHANGES Program for energy assistance while CHANGES Program CBOs can connect clients requiring food assistance back to these other organizations. This approach may reduce individual outreach costs and provide clients with more holistic and comprehensive services, improving the overall impact on the community and each programs' effectiveness.

- **Developing strategic partnerships could be a powerful addition to the CHANGES Program.** While many CHANGES Program CBOs act as contained referral networks for many different services (e.g., food, job training, childcare) and also partner with non-profit organizations in their community, there is room for growth in terms of creating and leveraging strategic partnerships for all CBOs in the program. These could include partnerships with other CBOs that provide different resources, utility or statewide programs, or local government officials or departments to expand the support and outreach provided to community members. This type of outreach could save time and money for the program.

> **Encourage CHANGES Program CBOs to increase their partnerships with other programs and organizations to facilitate incoming referrals**. CBOs can be compensated to build and leverage relationships with other non-profits or agencies that can refer clients to the CHANGES Program and vice versa.

- **Ensuring organizational, systemic support**. Strong partnerships between utilities and CBOs require structured communication channels and feedback loops. Designating points of contact at both utilities and CBOs and creating formal data-sharing protocols enhances program coordination, responsiveness, and data security, ultimately improving service delivery.

  - **The CHANGES Program lacks structured and supportive IOU and CBO coordination.** This lack of coordination significantly impacts the implementation of the program. Lack of IOU coordination impacts case resolution time and ability (377 cases currently remain open with one of the main reasons being a lack of utility response).

> **The CHANGES Program should partner with IOU liaisons to further support issue resolution and help CBOs provide services to utility customers. IOUs should provide dedicated support to the CHANGES Program through IOU liaisons.** These liaisons should act as a feedback channel when IOU coordinated efforts (like Customer Service Representatives on phone assistance lines) fail to provide adequate support to CHANGES Program CBOs.

- **Utilizing technology to complement services rather than substitute**. Digital tools, both relating to social media and language translation, have the potential to improve CBO effectiveness. One program highlighted the importance of engaging communities using digital tools most often used by community members (i.e., Facebook versus X versus WhatsApp). Another program successfully utilized digital platforms to raise awareness and start conversations to reduce stigma around mental health. These digital tools should not replace personal engagement but rather spur conversations and enhance discussions. Human-centered, culturally informed outreach should always be the focus, but can be complemented by the use of technology.

  - **The CHANGES Program administers in-person case assistance,** providing hands-on, real-time assistance when clients need it. CBOs often help clients navigate utility technologies, including paying bills online, and other utility communications**. CBOs often leverage social media as part of their outreach approach** and the CHANGES Program offers reimbursement for social media placements. There may be communities where a WhatsApp group would be

the most efficient way to engage clients, however currently the CHANGES Program does not offer reimbursement for this type of outreach and education.

> **The CHANGES Program should explore and leverage social media and digital platforms that are most used in their communities** and CHANGES Program reimbursement should cover all appropriate platforms.

- **Using data to drive program improvements**. Collecting and analyzing participation data by language or cultural group is a statistic that many programs overlook in reporting. Ensuring that disaggregated data is collected through multi-lingual surveys, CBO outreach, and community listening sessions can help to identify unmet community needs, and tailor services to those being underserved. Our research identified a study which included a customer journey mapping and barriers study to identify participation barriers and challenges, highlighting positive experiences, and pivotal, pain, and dropout points through interviews with participants and non-participants. This type of study is beneficial to increase understanding of what is working and where improvements are needed.

  - **The CHANGES Program tracks client casework, outreach, and education activities by language**. This data is used to inform quarterly and annual reports written by IILA and Milestone Consulting, as well as to inform evaluation research. **The CHANGES Program also routinely collects education evaluations** (i.e., post education assessments of client comprehension) for which they are compensated. Currently, the CHANGES Program does not review the education evaluations and thus they are not used to improve education events.

- **Implementing plain language standards**. Adopting plain language practices across program communication materials, especially the most frequently used materials, can improve accessibility and engagement with LEP communities. Plain language principles—emphasizing everyday vocabulary, clear sentence structure, and user-friendly design—are essential tools for ensuring equitable service delivery and building trust with diverse client populations.

  By prioritizing straightforward, jargon-free communication in all written program materials, comprehension barriers that disproportionately affect LEP communities and individuals with varying literacy levels can be reduced. This will enhance understanding of program benefits and requirements as well as demonstrate respect for clients' time and dignity, fostering stronger relationships between the program and the communities it serves.

  - **CHANGES Program materials are mostly in plain language but could improve in accessibility.** CHANGES Program materials limit the use of jargon and utilize some user-friendly design principles. However, many of the materials are at a higher reading level than is recommended (currently materials are around a 6th – 7th grade reading level; a 4th grade reading level is recommended) and the documents are often text heavy with longer sentences than advised.

> **Review and update CHANGES Program materials to comply with plain language standards.** Materials should 1) align with CA plain language standards, 2) be written at or slightly above a 4th grade reading level, 3) be designed in an accessible fashion including minimal blocks of text, shorter sentences, and more pictures or diagrams.

- **Reducing stigma and normalizing conversations around assistance**. Targeted initiatives can reduce the shame and stigma and normalize conversations around seeking financial assistance and managing debt. Interview findings consistently revealed that feelings of shame and embarrassment constitute significant barriers to program enrollment, preventing eligible families from accessing the support they need, or waiting too long to receive help.

  Addressing deep-rooted cultural attitudes may require intentional and creative approaches that create safe spaces for dialog outside traditional institutional settings. For example, one organization we spoke with successfully utilized story-cloth embroidery workshops to facilitate discussions around mental health stigma, demonstrating how culturally grounded activities can open pathways to sensitive conversations.

  - **Many CHANGES Program CBOs mentioned shame and stigma are barriers to customers directly seeking utility help**. Some CBOs reported that in their communities asking for help is "not good" leading many to avoid seeking utility assistance. Some clients delay reaching out for help, waiting until their situation becomes unmanageable, because of embarrassment or not wanting to be a burden.

  - Language barriers can also contribute to feelings of shame in some communities. **CHANGES Program CBOs build trust by employing staff who share the language and cultural background of the communities they serve**. This helps clients feel understood and less judged. CBOs integrate information about assistance programs into community events, workshops, and social gatherings, so learning about and accessing help feels like a normal part of community life. This reduces the perception that seeking help is only for those in crisis or is something to be ashamed of. CBOs foster a sense of belonging by providing social activities and holistic support. This helps clients feel like part of a community and not singled out for needing help.

5.2 MARKET PROFILE ANALYSIS

This section summarizes the market profile analysis related findings and recommendations from the Market Profile Analysis section of this report.

Program Implementation

- **The CHANGES Program is an important statewide resource for LEP utility assistance**. A network of 28 distinct CBOs served clients in 37 languages across the state between 2022 and 2024, providing a unique, CBO-driven structure that supports both personalized case assistance services and energy and financial education. [Section 4.2.1]

- **CHANGES Program administration by IILA and Milestone Consulting is comprehensive and resource intensive**. These entities oversee: program planning and management, invoicing and budget allocations, program data base management, CBO education, training, and case management support, program performance tracking and reporting, and serve as a liaison between the CBOs and CPUC staff. Their workload and costs have grown in past years due to increasing program requirements and inflation, without corresponding budget increases. [Section 3.2.1]

- **Most CBOs participate in all program areas, but volume of services provided varies by CBO**. 28 CBOs provided needs assistance in calendar years 2022-2024 (range from 2,228 to 2 cases) and held educational events (range from 868 to 6 events), 24 CBOs assisted with dispute resolution (range from 328 to 1 cases), and 24 CBOs conducted outreach events or media placements (range from 46 to 1 events and 11 to 1 placements). [Section 4.2.2]

- **Data systems limit program evaluability**. The CHANGES Program tracking database lacks unique client identifiers to understand the frequency with which clients return for aid, complex client issues that involve multiple resolutions, and complete demographic data that could enable a more detailed understanding of clients served by the program. [Section 4.2.1]

> **Continue improving program tracking data** to include standardized client IDs to track returning clients and add functionality to allow CBOs to track more than one resolution per case.

- **The CHANGES Program does not have pre-defined success metrics or key performance indicators (KPIs) against which the Program or CBOs are measured**. KPIs can be a helpful tool to measure a program's performance and identify problem areas. However, they can also encourage certain implementation approaches and can limit flexibility.

> **The CPUC should explore in a future evaluation whether the CHANGES Program should establish pre-defined success metrics or not.** The CHANGES Program has a unique ability to help its clients with a wide range of needs which evolve over time. A future evaluation should explore the pros and cons of establishing success metrics or KPIs for this program.

Demographics of Clients Served

- **CHANGES Program services are most often provided in Spanish, Cantonese, English, and Vietnamese.** During calendar years 2022 to 2024, Spanish accounted for roughly 37% of all cases, followed by Cantonese at 21%, English at 16%, and Vietnamese at 7%. [Section 4.3.1]

- **Some languages that are commonly spoken by the LEP population in California receive little to no CHANGES Program services.** Russian and Punjabi speakers are some of the most commonly spoken languages by the LEP population in California (8th and 10th most common). However, there are very few cases in Russian and no CHANGES Program cases in Punjabi in calendar years 2022-2024. It may

or may not be the case that the communities which speak these languages have less need for CHANGES Program services than communities of other languages. [Section 4.3.1]

> **Explore whether languages with low CHANGES Program case rates compared to the population of LEP customers in California are being underserved or are less in need of CHANGES Program assistance.** For underserved populations, identify means of expanding the program to better serve these customers (such as additional CBOs or expansion of language capabilities within current network of CBOs) and ensure the program budget is revised as needed to reflect this expansion of services.

- **The share of CHANGES Program cases conducted in English has remained relatively consistent since 2016.** While the number CHANGES Program cases completed in English increased slightly in calendar years 2022-2024 compared to prior years (14% on average in 2016 – 2021 versus 16% during 2022 - 2024), the overall share they make up has remained between 10% and 18% since 2016. These cases include non-LEP clients as well as LEP clients who receive support in both English and their native language. [Section 4.3.1]

- **Client demographics reflect an older and economically vulnerable population**. Thirty-six percent of CHANGES Program clients are 65 or older, more than double the statewide share (16%). Older clients request needs assistance significantly more often than their younger counterparts as they live on fixed incomes which make them more vulnerable to rising utility rates. This demographic also faces greater technological challenges that CHANGES Program CBOs can effectively help them mitigate. [Section 4.3.2]

- **Most CHANGES services are provided to low-income clients**. Each calendar year from 2016 through 2024, 95-96% of CHANGES clients were eligible for CARE enrollment, indicating that the vast majority of CHANGES clients are part of low-income households. [Section 4.3.4]

- **Increased immigration levels present service challenges.** A heightened organizational distrust and wariness of many LEP clients to provide personal information has emerged, driven by increases in new immigrant arrivals and exacerbated by the current political climate. [Section 4.3.3]

> **The CPUC should review what sensitive client information is necessary for program implementation and evaluation and desist collection of any identifying information outside of required fields.** IOUs should provide resources to assist CBOs in identifying which sensitive client information is required, and the best way to store and transfer this information. The CHANGES Program tracking data should also be updated to record and report on data in an anonymous fashion (including anonymous client identifiers across records). Appropriate budget increases should take place to allow for this task.

- **Evolving CHANGES Program demographics require updated resources**. An increase in recently arrived immigrants and shifts in the languages certain CBOs serve has created the need for some CBOs to create new resources or hire more staff to accommodate additional languages (that are new to that CBO). This has created service challenges for many CBOs and pushed their allocated budgets past their capability. [Section 4.3.6]

> **Explore creating new education programming and in-language materials to support the increasing diversity of those being served by the CBOs.** These updates must be supported by additional CHANGES Program funds that will be used to compensate efforts by the CBOs and CHANGES program implementers.

- **CHANGES Program clients face multiple barriers to seeking utility assistance independently**. CBOs report on average 87% of clients have limited English proficiency, 81% struggle with technology or utility literacy, and 59% have a fear or distrust of utilities. [Section 4.3.5]

Services Provided to Targeted Clients

- **Education events serve the unique needs of CHANGES Program clients but are impacted by funding**. Educational events most frequently focus on understanding utility bills and enrolling in CARE/FERA or other assistance programs. In PY 24/25, educational events were impacted by budget constraints (down 45% over the prior program year). [Section 4.4]

> **Allocate additional program funding to support education events,** as they are a powerful way to help multiple clients at once, build greater community resilience, and can help reduce the need for case assistance services.

- **The value of education evaluation data is uncertain as it remains unanalyzed**. Over 1,200 education evaluations were conducted in the most recent program year, however the purpose and value of these evaluations are unclear as the data collected as part of these post-training evaluations is not currently being analyzed due to CHANGES Program budget constraints. [Section 4.4]

> **Clearly determine and document the goals and objectives of the education evaluations** and then either discontinue the collection of this data or ensure there is funding and a process established to analyze and provide feedback to the program based on this data.

- **Word of mouth remains the most common way clients learn about the CHANGES Program**. Educational events and CBO programming also play large roles in driving clients into the program. [Section 4.4.2]

- **Outreach activities have declined in recent program years due to funding limitations**. Limited program budgets result in CBOs prioritizing providing case assistance to clients over conducting program outreach activities. Slightly more than half of the CBOs contacted during this study (10)

reported continuing to conduct outreach activities for which they were not compensated. [Section 4.4]

> **In the case that CHANGES Program funding levels do not increase appropriately to support all case assistance needs with adequate reimbursement levels, then the CHANGES Program should continue to reduce the focus on outreach activities** (e.g., community outreach event, newspaper/radio/tv) and leverage the outreach activities that produce the most referrals for the least cost (word of mouth, other programming within the CBO, and CHANGES Program educational workshops).

- **Case activity is dominated by payment difficulties and bill-reduction program assistance**. Assistance with LIHEAP, AMP, and other payment assistance programs represented 86% of cases in calendar years 2022-2024, up from 76% prior to calendar year 2022. [Section 4.4.3]

- **Some CHANGES Program clients attempt to resolve utility issues themselves first**. More than half of CBOs reported that some of their clients attempt to resolve utility issues before seeking CBO assistance (n=11 CBOs) but language barriers, limited education or financial literacy, and difficulty navigating IOU systems make clients unsuccessful in resolving issues independently. [Section 4.4.3]

- **Instances of repeated services to the same client are frequent**. CBOs report CHANGES Program clients 'often' (44%) or 'sometimes' (50%) return for additional CHANGES Program assistance. Many CBOs shared that clients return for help with the same issue (42% of CBOs). [Section 4.4.3]

> **Work with CBOs to identify areas where simple, in-language illustrated guides or checklists could be created to assist clients with frequent recurring issues** (e.g., CARE re-enrollment, understanding utility bills, navigating IOU systems to pay bills). Ensure CBOs are compensated for this activity.

- **Some CHANGES Program cases remain unresolved**. 377 cases remain were opened sometime between 2016 and 2023 and never resolved. CBOs listed a wide variety of reasons including that required documentation was missing, the utility or 3rd party aggregator was not responsive, or clients were not eligible for any programs that could help them. [Section 4.4.3]

- **The CHANGES Program helps clients alleviate significant outstanding utility balances.** Roughly one-third of CHANGES Program clients from 2022 to 2024 had outstanding utility balances. Over this period, the CHANGES Program helped clients with outstanding balances of approximately $1.2 million per year sign up for payment plans and monthly bill assistance programs to help alleviate these issues. [Section 4.4.3]

- **Program administration activities reduce client service time**. CBOs share that activities such as post-activity outreach event calendars, human interest story collection, and complex data entry reduce compensated time for direct community assistance. [Section 4.4.4]

> **Review all administrative activities and expectations to ensure CHANGES Program funding is being spent in a manner that optimizes the impact and quality of services being delivered.** Reduce, remove, and/or simplify tasks that do not directly support the implementation and evaluation of the CHANGES Program.

- **IOU assistance is limited and impacts CHANGES Program services**. CBOs often experience long response times when calling the utility hotlines. Additionally, CSRs sometimes are not well informed about the CHANGES Program and do not let CHANGES Program representatives speak on behalf of their clients. [Section 4.4.4]

> **The CPUC should work with the IOUs to verify the IOU phone lines provided to CHANGES Program CBOs are staffed with representatives knowledgeable about the CHANGES Program.** IOUs should provide points of contact for the CBOs that are knowledgeable about the CHANGES Program.

> **Ensure CBO staff know how to report any issues they encounter with the IOU phone lines.** The quantification and nature of these issues should be reported regularly by IILA/Milestone Consulting to the CPUC during periodic check-in calls such that the CPUC can address these issues with the IOUs.

- **IOU coordination is a challenge**. Structure of quarterly meetings attended by the CPUC, IOU representatives and CHANGES Program implementers does not promote substantive interactions or collaboration amongst key parties. [Section 4.4.4]

> **The CPUC should co-develop agendas with CHANGES Program implementers ensuring there is sufficient time during meetings with IOUs to discuss** program implementation challenges and solutions on standing topics (such as status of IOU phone line accessibility and in-language material delivery), and IOU policy, program, and eligibility updates.

- **CBOs reported issues with CHANGES Program printed materials request process, which hinders service**. Not all materials are available in the primary languages served and CBOs reported issues receiving printed materials. [Section 4.4.4]

> **Develop (and ensure CBOs are aware of) protocols for reporting and/or escalating issues related to in-language material order fulfillment.**

Geographic Distribution and Service Gaps

- **Within high LEP populated counties, some counties have higher levels of service than others**. Geospatial analysis identified under-served and high-energy-burden areas. With over 1,000 LEP households per case, Riverside, Kern, and Contra Costa counties may be underserved within California. Households in Riverside and Kern also have higher average energy burdens (>3%). Riverside and Kern Counties are predominantly Spanish speaking counties. Contra Costa consists primarily of Spanish, Chinese, other Indo-European Languages, and Tagalog. [Section 4.5.3]

- **Some counties with large numbers of LEP households receive little to no CHANGES Program services.** Ten counties with 5,000 to 20,000 LEP households (0.5% to 2.4% of total LEP population) have an average of less than 10 CHANGES Program cases per year (five of those have zero CHANGES Program cases). Of these ten counties, four also have high average energy-burden levels (>3%), Tulare, Imperial, Merced, and Kings. The number of LEP households in these counties ranges from over 18,000 in Tulare County to 5,600 in King County. [Table 4-18]

- **Some areas receive disproportionately higher levels of CHANGES Program service**. Madera county has fewer LEP households compared to other counties (<5,000), however there are two CBOs that primarily serve Madera County residents. [Section 4.5.3]

Funding Analysis

- **CHANGES Program annual funding has not kept up with inflation**. The annual program funding level has remained at ~$1.7 million per year since 2016. Measures of inflation over that time period indicate inflation rate ranging from 39.7% (Consumer Price Index) to 45.4% (Wage growth) over this time period. [Section 4.6.4]

- **Most CBO reimbursement rates have not kept up with inflation.** In PY24/25 the reimbursement rates for Dispute Resolution and Needs Assistance increased to $200 and $125 per case, respectively. These increases matched or exceeded measures of inflation from 2016 to 2025. The reimbursement rates for education and outreach activities have not increased (and in some cases have decreased) from original 2016 levels. [Table 4-32]

- **CHANGES Program funding levels are insufficient to serve all customers in need.** Demand for CHANGES Program services has increased since the pandemic. In PY 22/23 and PY 23/24 the CHANGES Program budget was more than $1.75 million per year due to rolling over unspent funds from prior years under state contracting rules. However, starting in PY 24/25 there were no unspent funds that could be utilized. Funding in PY 24/25 was limited to $1.68 million, and CBOs had $200k less funds available to them than in the prior year (CBO budget was $925.5K in PY 24/25 and they spent $1.13M in PY 23/24). When interviewed, most CBOs said that funding levels were not currently adequate to cover services. While the CBOs never turn clients away, they reported providing CHANGES Program services for which they were not compensated. [Section 4.6.1]

- **CBOs performed significant uncompensated work**. More than half of CBOs (12 of 19) reported their organization provided CHANGES Program services they were not compensated for due to insufficient program funding. (Nine CBOs reported completing uncompensated case assistance activities, ten

reported uncompensated outreach activities, and six reported uncompensated educational events). [Section 4.4]

■ **Increases in CBO case assistance reimbursement rates absent an increase in overall program funding resulted in decreased service capacity in PY 24/25.** There were fewer dispute and needs assistance cases than in each of the prior two program years. In particular, needs assistance case volume in PY 24/25 was 31% to 43% less than the prior three program years [Table 4-9]. Increasing case assistance reimbursement rates in PY 24/25 without an increase to the overall program budget meant fewer cases could be completed during the year due to budgetary constraints. [Section 4.6.4]

CHANGES Program funding should be increased to account for inflation and unmet program demand. Section 4.6.4 outlines our recommended approach program fundings with inflation rates and current program demand. Reimbursement rates should be increased to align with inflation (see Table 4-32). The administrative program budget should also be increased to align with inflation (see Table 4-34 budgets for IILA, Milestone Consulting, IT-TC Consulting, and DVBE). The CBO portion of the budget should be increased based on inflation-adjusted reimbursement rates multiplied by the activity levels seen in PY 23/24 when services were less constrained by budget than PY 24/25 (see Table 4-34 CBO budget). We also include a recommended budget per CBO, which should be considered if the CBO network was expanded beyond 25 participating CBOs. **Overall, we estimate the CHANGES Program budget should be increased to $2.6 - $2.7 million per year (assuming 25 CBOs).**

APPENDIX A CHANGES BENCHMARKING INTERVIEW GUIDE

A.1   PURPOSE

The evaluation team will conduct semi-structured interviews with program staff of identified programs have similar characteristics to the CHANGES program. These surveys will be used to collect relevant data to further understand any similar service offerings with the CHANGES Program, determine strengths and weaknesses of similar services, and identify new or unique implementation strategies that could be employed to improve the effectiveness of the CHANGES Program. This document outlines the topics we plan to explore during the interviews.

A.2   SURVEY INFORMATION

The evaluation team has selected the following programs for the benchmarking interviews. The table below contains acronyms used to refer to each program or service. These acronyms are used to identify questions in the interview guide which are targeted for specific programs.

TABLE A-1: PROGRAM ACRONYMS

Acronym	Program or Service
CUB	Citizens Utility Board Bill Clinics
CAP	UGI Customer Assistance Program
CMHE	Community Mental Health Equity Project
LACC	Language Access & Cultural Competency Funding
LACR	Language Access & Cultural Responsiveness Research
NVA	Nuestras Voces Adelante
CEEP	Community Energy Engagement Partnership

A.3   INTERVIEW RECRUITING EMAILS

Subject: Interview Request – Benchmarking Research

Hi [**First Name**],

My name is [**Name**] with Verdant Associates. We are a consulting firm contracted to evaluate California's CHANGES program (Community Help and Awareness of Natural Gas and Electrical Services). Our evaluation is overseen by the California Public Utilities Commission.

VERDANT

As part of the evaluation, we are leading a benchmarking task to better understand how similar programs serve their target communities and meet program goals.

We would like to understand more about [**Program**] to learn from your successes and challenges. Please let us know if you are available for a call, so that we can learn from you about [**program**].

You can click on this [**link**] to schedule a time that works best for you, or we can arrange a time by email.

If there is someone else in your organization who would be a better contact for this discussion, please provide their information so that we can contact them.

Thank you for your time,

[Name/email/phone]

Verdant Associates

This evaluation is overseen by the California Public Utilities Commission, learn more here: https://www.cpuc.ca.gov/about-cpuc/divisions/news-and-public-information-office/consumer-affairs-branch/team-and-changes-programs.

I found your contact information from the CUB website. You may not be the right person I'm attempting to reach, so if not, I apologize, and I hope you might be able to point me in the right direction.

My name is [INTERVIEWER NAME] with Verdant Associates. We are a consulting firm contracted to evaluate a California-based program called *Community Help and Awareness of Natural Gas and Electric Services (CHANGES)*. The program provides services to Limited English Proficient (LEP) consumers who are looking for help with energy issues, including education and bill assistance. The CHANGES program and evaluation is overseen by the California Public Utilities Commission (CPUC).

Our evaluation includes a benchmarking study to learn how similar services/programs throughout the country serve their target communities and meet goals. We identified services provided by the **CUB Outreach Team** and **CUB Consumer Advocacy Team** as similar programs/services to include in our study. Specifically, we are interested in **CUB's education, bill clinics and hotline**.

We are hoping you (or someone from your team) may have 15 minutes to chat with us around organization goals, successes, challenges, and lessons learned from these programs/services.

Any chance we could set up some time this week or next week to chat? Or is there someone else from your organization that might be a better fit for this discussion?

We can send out a few times that may work.

Thanks so much for your time!

A.4   INTERVIEW GUIDE

Introduction

Thank you for taking the time to speak with us. We'd like to start our discussion with some background about Verdant and why we are talking today – Verdant is a consulting firm which specializes in objective, data driven analysis and advisory services, mainly to utility companies and government agencies such as the California Public Utilities Commission. We are currently evaluating the CHANGES program, which is an acronym that stands for Community Help and Awareness of Natural Gas and Electrical Services. This program seeks to provide services to Limited English Proficient customers in California who need help with issues related to their electric and gas service. Program services include help accessing or updating their account, understanding program offerings, paying bills or understanding what to do if they cannot pay their bills. The program is operated by a network of community-based organizations (or CBOs) that perform community outreach to connect with these communities.

As part of the evaluation, our team is leading a benchmarking task, to better understand how other similar programs successfully meet the needs of the programs they offer and the communities they serve.

While we realize that the [**Program**] isn't identical to the program that we are evaluating we believe there may be some similarities between what CHANGES offers, and what you offer. We would like to understand more about your program to so that we can learn from your successes, as well as understand your program's challenges.

With your permission, I'd like to record this discussion for note taking purposes. Do I have your consent to begin recording? **[Begin recording if they agree]**

Do you have any questions for me before we begin?

1. Please describe your role and responsibilities as it pertains to **[*program*]**.

[IF program = LACR, SKIP TO QUESTION 14]

Program Details

2. Can you provide a description of [**program**]? (probe for: Services provided; case management)

[if program is not NVA] 2b. How are services implemented?

[if program = CUB] 2c. What are the differences between the virtual and in-person bill clinics? (probe for: marketing, participants)

[if program = CMHE] 2d. Can you describe the services related to "increased access & case-management"?

[if program = CMHE or LACC or NVA or CEEP, Else Skip to 4]

3. What is the role of the Community Based Organizations (CBOs)? (probe for: cultural competency)

      3a. Describe the partnership between the CBOs and the project.

4. What need is addressed by [**program**]?

[if program = NVA, SKIP TO QUESTION 5]

4a. Are there aspects of [**program**] specifically designed to eliminate the need for participants to require future help of the program, by enabling them to pursue the help they need themselves?

[if program = CMHE] 4b. One of the project domains is noted as "technology access and enhancement". How does "access to technology" play a part in people receiving or not receiving the help they may need?

4c. Are there ways that people might mitigate the negative impacts of not having access to technology?

5. How does someone qualify to benefit from [**program**]? (probe for: target population)

[if program = LACC] 5a. Is there a different target population for different events?

6. What are the general demographics of participants? (probe for: age, income level, LEP status, specific communities)

[if program = CUB or CAP or CEEP] 6a. Is any part of the program specialized or tailored to serve limited English speaking populations?

[If 6a = Yes] 6b. If so, can you provide more information about it?**[if program = CUB or CAP or CEEP]**

7a. Does the program include or incorporate any one-on-one case management?

[If 7a = Yes] 7b. If so, can you provide more information about it, how it works, and how affective it is?

8. What is the marketing strategy of [**program**]? How do most people hear about [**program**]?

9. Does this program connect participants or educate participants about other services from which they could benefit?

Program Outcomes

10. How do you measure success of [**program**]? What metrics are used?

11. What do you perceive as the strengths of [**program**]? (Probe for strategies that work exceptionally well, what about them makes them work?)

12. What do you perceive as the weaknesses of [**program**]?

12a. Is there anything being done or any recommendations to address this?

13. How satisfied are participants with [**program**]?

Funding/Expense

14. What is the funding structure of [**program**]? Can you provide information on implementation costs?

LACR Questions

[Ask Question 15 Through Question 18, Only If Program = LACR]

15. Can you tell us more about the research.

>   **15a**. What was the purpose of the research?

>   **15b**. How was the research funded?

>   **15c**. What were the research outcomes, and were they achieved?

>   **15d**. Is further research planned?

16. What was La Clinica del Pueblo's role in the work (or if interviewing La Clinica del Pueblo, what was your role in the work)?

17. With the focus on language and cultural barriers, what are main takeaways from the research?

>   **17a.** What are real-world examples of how these barriers may be overcome?

18. Based on your research and expertise, do you have any best practices or strategies you could suggest for reaching under-served communities to be most effective?

Documentation and Additional Contacts

19. Do you have any materials such as reports, budgets/financials, program satisfaction, or implementation plans you can share with us?

20. Do you have recommendations of someone else we should speak with [either from one of the CBOs you work with, or anyone else]?

APPENDIX B CHANGES PROGRAM ADMINISTRATOR INTERVIEW GUIDE

B.1   RESEARCH OBJECTIVES AND QUESTIONS

This is the interview guide to be used for IDIs with both IILA and Milestone Consulting. We will be conducting 1.5-hour interviews with each organization to discuss the CHANGES program.

The table below summarizes the research topics and questions that will be included in the interview.

TABLE B-1: PRIMARY RESEARCH OBJECTIVES, QUESTIONS, AND ACTIVITIES

Research Objective and Questions	Questions
Benchmarking Analysis	
1. What programs (offered by IOUs or in other jurisdictions) provide similar services to the customers served by CHANGES? Do the similar programs use any approaches or provide any services that should be adopted by the CHANGES program?	bench_1, bench_2, bench_3
2. If present, what are the strengths and weaknesses of the overlapping IOU offerings and, how can similar services be streamlined to optimize customers' experiences and the use of ratepayer funds?	bench_2, bench_3
3. How could the need for CHANGES services be mitigated by addressing customer issues when they first arise?	cust_5, cust_6
Market Profile Analysis	
4. What are the demographics of the clientele currently served via the CHANGES CBO network?	cust_1
5. Is the program currently providing services to targeted customers that are not formally acknowledged?	cust_2
6. What are the core missions, customer demographics, locations served, and services offered by the CBOs supporting CHANGES?	backgr_1, backgr_2, backgr_3, goal_1, goal_2
7. What are the core reasons customers are soliciting assistance from the CHANGES CBOs?	cust_3,
8. Has the program evolved and shifted its focus from LEP customers to other populations which may warrant additional program services?	cust_1, cust_4
9. Where (geographically) are program services being conducted and does the level of service address customer segment needs? Are all CBOs providing services in the four program areas of interest?	cust_4, cust_9, cust_10, cbo_1, cbo_2
10. Are there any gaps in CBO service coverage (such as areas having high need but lacking access to services)?	cbo_1, cbo_2
11. Is a change in program funding warranted considering: 1) PY 2022-24 program activity and financial data and historical program data and trends (e.g., clients seeking services, program spending, and program service needs) 2) Wage and cost inflation and program changes since PY 2016?	fund_1, fund_2, fund_3, fund_4, fund_5, fund_6, effect_1, effect_2

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B.2 INTERVIEW GUIDE

B.2.1 Introduction Script

Hi [FIRST NAME]. This is _____ from Verdant Associates, calling to discuss the CHANGES program. Is now still a good time to talk?

As I mentioned, Verdant Associates is working with the CPUC to evaluate the CHANGES program. Your insights as the program administrator are crucial for understanding how the program operates, what challenges you face, and how customer demographics and needs may be changing

[**IILA**] Throughout our conversation, we will be asking you questions that relate to your role as the program manager. Please try to think about this as the program manager. Additionally, where you feel it would be meaningful, let us know your responses as they relate to your role as an individual CBO.

I'll be taking notes, but I would like to record this conversation to ensure accuracy. Is that okay with you? Do you have any questions before we begin?

B.2.2 Background and Role

backgr_1. What is your role at [IILA/Milestone Consulting] as it relates to the CHANGES program?

> **backgr_1a.** How long have you been in this position?

backgr_2. What are [IILA/Milestone Consulting]'s primary responsibilities with regards to CHANGES? How long has your organization been performing this role?   [*Probe: Managing the CBO network, liaison with CPUC/IOUs, program oversight, training, etc.*]

> **backgr_2a.** How many people at your organization support the CHANGES program? Please describe their roles and whether they are full-time or part-time involved with CHANGES.

backgr_3. How does the CHANGES program align within your organization's primary activities or mission?

B.2.3 Program Goals

goal_1. How would you describe the primary goals of the CHANGES program?

goal_2. How does your organization measure or track the effectiveness of the program towards meeting its primary goals or objectives?

B.2.4 Customer Demographics and Evolving Needs

cust_1. Have you noticed any changes in customer demographics since the beginning of your organization's involvement with CHANGES?   [*Probe: Age, income level, languages spoken, length of time in the US, family structure, culture, types of support or assistance needed]*

cust_2. Is the CHANGES program currently serving customer populations that weren't originally part of the program's target demographic of LEP customers? Please describe the shift in demographics you've seen? Is data on this shift captured in the program tracking data?

> **cust_2a.** Has support of non-LEP customers changed over time? Why?

> **cust_2b.** Do non-LEP customers typically require different assistance than LEP customers?

> **cust_2c.** Has service to non-LEP customers impacted the program's ability to service to LEP customers?

cust_3. How do customers typically learn about the CHANGES Program services? Do customers initiate contact because of utility related needs or other issues? (e.g., Housing, Food, etc.)

cust_4. Do you believe the current program services (case management, education, outreach) adequately address customer needs? *[Probe: Are there gaps in services? Services that are underutilized? Energy-related needs among LEP customers not currently addressed by the program?]*

In your experience can you estimate what proportion of consumers needing case assistance return to the CHANGES CBOs for additional services in the future? Do future issues tend to be the same as prior issues reported?

cust_5. In your opinion is there anything that could be done (by CBOs or IOUs) to avoid the need for consumers to seek additional assistance in the future from CBOs after their initial issue(s) have been resolved?

cust_6. What can IOUs do better to ensure that consumer issues are resolved before they need the support of a CHANGES CBO? *[Probe: Financial Assistance Programs/ Bill Reduction]*

B.2.5 CBO Network

cbo_1. Are there geographic areas, language communities, or other communities that you believe are underserved by the current CBO network? *[Probe: What is contributing to this? Why are these customers underserved?]*

cbo_2. In order to meet the needs of the target population, would you recommend any changes to the CBO network? *[Probe: Geographic additions? Languages/Communities?]*

B.2.6 Funding and Program Sustainability

fund_1. (*We're familiar with the current allocation of funds, as found in the CPUC/IILA contract signed in 2024*) In your opinion, is the current allocation of funds appropriate for the goals of the program and the needs of the customers being served?

> **Fund_1a. Consider Allocation Across All Tasks**: (CBO Activity/Database Admin/Marketing/Reporting/Other Admin)

Fund_1b. Consider Within CBOs (Outreach/Education/Needs Assistance/Dispute Resolution/Other Billable)

fund_2. What happens if a CBO goes over their maximum allotted budget for an activity-type? (e.g., outreach, education, needs assistance, dispute resolution)

fund_3. In the last three years, were there any costs incurred by [IILA/Milestone Consulting] or the CBOs that were not covered by the program's funding? *[Probe: Invoicing activities?]*

> **fund_3a**. [If Yes] How do you manage these financial challenges?

fund_4. Do reimbursement rates adequately compensate CBOs for their work?

> **fund_4a.** [If No] What is a reasonable reimbursement rate for the CBOs?

fund_5. The program budget has remained at ~$1.7 million per year since 2016. How has this affected program operations in the last three years? *[Probe: Impact on CBO compensation, ability to expand services, administrative costs]*

> **fund_5a.** Are there program management or administrative tasks that are not taking place due to limitations of the current funding? *[Probe: Not making necessary changes/updates to the program tracking database]*

fund_6. Are CBOs able to serve all CHANGES-eligible customers who seek assistance? *[Probe: If not, what are the primary reasons why? Budget Limits? Capacity Constraints? Referrals to other organizations? Unmet demand? Scope outside of what CBOs can provide assistance with?]*

fund_7 In your opinion, is the current program funding at a level which allows [IILA/Milestone] to sustainably cover all reasonable costs associated with managing the program?

B.2.7   Benchmarking and Program Comparison

bench_1. Are you aware of other programs, either offered by the IOUs or in other states, that provide similar services to those offered via the CHANGES program? *[Probe: What programs? In what ways are they similar to CHANGES?]*

bench_2. Do you see any overlap between the services CHANGES provides and other IOU utility programs or services? *[Probe: Do you coordinate with IOU programs to enhance the effectiveness of CHANGES? Are there areas of duplication or confusion?]*

bench_3. What do you see as CHANGES' unique strengths compared to other services offered by the utilities?

B.2.8 Program Effectiveness and Future Directions

effect_1. What do you see as the biggest challenges facing the CHANGES program currently? *[Probe: Funding, staffing, customer outreach, program complexity, database and managing across a large number of different organizations]*

effect_2. If CHANGES had additional resources, what would be your priorities for program improvement or expansion? *[Probe: Geographic expansion, new services, additional CBOs, enhanced training, evaluating services delivered and ongoing strategic review of services. Database improvements]*

effect_3. Are there any program services or approaches that you think should be modified or eliminated? Why and How?

B.2.9 Closing

close_1. Is there anything important about the CHANGES program that we haven't discussed today?

close_2. Do you have any questions about this evaluation or our research approach?

Thank you very much for taking the time to speak with us today. Your insights are invaluable for understanding how the CHANGES program is operating and how it might be improved to better serve California's limited-English proficient customers. We appreciate your cooperation with this evaluation.

APPENDIX C   CHANGES CBO SURVEY

C.1   PURPOSE

To identify specifics around program approaches (e.g., CBO outreach strategy, case management specifics, educational offerings, etc.) and ask questions to better understand how program services and demographics are changing through time.

C.2   INTERVIEW AND SURVEY INFORMATION

This document is designed to be used as both a phone interview guide and an online web survey instrument. The evaluation team will reach out to each CBO and request to conduct a one-hour interview. For CBOs that are unable to schedule an interview with the team, we will provide an option to respond to the questions via an online Qualtrics web survey. The questions will remain identical between the two options to facilitate analysis, post interview and survey completion. All CBOs, regardless of whether they choose the interview or survey option, will receive a $100 donation to their organization as thanks for their time.

C.3   MAPPING SURVEY QUESTIONS

TABLE C-1: RESEARCH OBJECTIVES WITH CORRESPONDING SURVEY QUESTIONS

Research Objective and Questions	Questions
Benchmarking Analysis	
1. What programs (offered by IOUs or in other jurisdictions) provide similar services to the customers served by CHANGES? Do the similar programs use any approaches or provide any services that should be adopted by the CHANGES program?	F4
2. If present, what are the strengths and weaknesses of the overlapping IOU offerings and, how can similar services be streamlined to optimize customers' experiences and the use of ratepayer funds?	C1a:b, C2, C3a:d, E2a:c, E3, E4, F1, F2, F4
3. How could the need for CHANGES services be mitigated by addressing customer issues when they first arise?	B2a:b, C1a, C1b, C2, C3a:c, E2c
Market Profile Analysis	
4. What are the demographics of the clientele currently served via the CHANGES CBO network?	A1, A3, A4a, A4b, C3a
5. Is the program currently providing services to targeted customers that are not formally acknowledged?	E3, E4
6. What are the core missions, customer demographics, locations served, and services offered by the CBOs supporting CHANGES?	A1, A2, A3, A4a, B1a, D1, D2
7. What are the core reasons customers are soliciting assistance from the CHANGES CBOs?	B1a, C1a, C2

8. Has the program evolved and shifted its focus from LEP customers to other populations which may warrant additional program services?	A3, A4a,b, B1a:b, C3a:d
9. Where (geographically) are program services being conducted and does the level of service address customer segment needs? Are all CBOs providing services in the four program areas of interest?	D1, D2, D3
10. Are there any gaps in CBO service coverage (such as areas having high need but lacking access to services)?	D2, D3, E4
11. Is a change in program funding warranted considering: 1) PY 2022-24 program activity and financial data and historical program data and trends (e.g., clients seeking services, program spending, and program service needs) 2) Wage, cost inflation and program changes since PY 2016?	A4b, A5, D2, D3, E1, E2a:b, E3, E4, E5a:b, E6a:b, F2, F3

C.4   INTERVIEW RECRUITING EMAILS

Subject Line: Your Expertise is Needed: Important Interview About the CHANGES Program

Hi [Name],

Verdant Associates is conducting an evaluation of the CHANGES Program for the California Public Utilities Commission (CPUC). Your participation will help us understand how the program is currently working for you and members of your community and whether any improvements can be made.

This interview should take approximately one hour to complete. Your responses will be confidential and reported in aggregate form. As a thank you for your participation, we will provide a $100 donation to your organization upon completion.

Please use the link below to schedule time to share your experience with the CHANGES Program. Our team looks forward to meeting you and learning more from you about how the program is serving your community's needs.

[link to schedule]

Thank you,
[NAME]

C.5   INTERVIEW GUIDE

Section A: Organization Background

A0. Please record the name of your organization for data entry purposes. [OPEN END, Force Response]

A1. What is your organization's main mission or goal? **[OPEN END]**

A2. Tell us about the demographics of customers you provide assistance to through the CHANGES Program (You can include age, income, languages they speak, how long they've lived in the U.S., family situation, cultural background, and other non-CHANGES help they need). **[Open end]**

A2a. How do members of your community typically learn about the services your organization offers through the CHANGES program? [Open End]

C2. Do customers typically come to you specifically for a utility issue, or do they come to your organization to get assistance with a different issue and then learn about CHANGES services you provide while receiving these other services from your organization?
1. Always for utility issues specifically
2. Usually for utility issues specifically
3. About half and half
4. Usually find out while seeking other services
5. Always find out while seeking other services

A3a. This study is focused on the CHANGES program over the last 10 years. Thinking back over that period, have the demographics of the clients your organization has provided assistance to through CHANGES shifted?
1. Yes, the demographics have shifted as follows: **[Open End]**
2. No

[IF A3a = 1]
A3b. Has this demographic shift impacted the services you provide through CHANGES**?**
1. Yes, the services we provide have shifted as follows: **[Open End]**
2. No

A4a. How many CBO staff are currently trained to handle CHANGES services? **[numeric]**

A4b. Has the number of staff changed over time?
1. Increased
2. Decreased
3. Stayed the same

A4c. What percentage of their time do these staff currently spend on CHANGES? (Please give the percent for each staff member currently supporting CHANGES) **[OPEN END]**

A4d. Has the total number of staff hours dedicated to CHANGES changed over time?
1. Increased
2. Decreased
3. Stayed the same

Section B: Service Delivery

B1a. Which of these CHANGES services do you offer? For each one, tell us if the need for these services has changed over time. **[Matrix with "No change in need", "Increased Need", "Decreased Need", "Don't offer this service"]**

1. Dispute resolution
2. Needs assistance to pay off outstanding utility bills (e.g., LIHEAP)
3. Energy and utility bill educational classes/workshops
4. Community outreach activities promoting CHANGES topics

[IF ANY CHANGE IN B1a]
B1b. What do you think has contributed to the change in need? **[OPEN END]**

B1a_Other. Are there any other primary services you provide through the CHANGES program? (If so, have the need for these services changed over time?) **[OPEN END]**

B2a. How often do your clients try to resolve their utility issues themselves, before seeking your help?
1. Always
2. Often
3. Sometimes
4. Never
5. Don't know

B2b_open End. Interviewer - DO NOT READ - This is a place to add notes here regarding question B2A **[OPEN END]**

[IF B2a <> 4,5]
B2b. What are the most common reasons they can't resolve their utility issues on their own? **[OPEN END]** **[PROBE: What did the customer do to try to resolve their utility issues]**

Section C: Customer Demographics & Needs

C1a. Next I am going to read you a list of reasons why customers may need CHANGES program assistance. Please tell me what percentage of your customers need CHANGES assistance for each of the following reasons:

(These do not need to add up to 100%)

1. Limited English proficiency: _____%
2. Cultural needs that can't be met by utilities: _____%
3. Lack of familiarity with utility systems: _____%
4. Complex billing or service issues: _____%
5. Difficulty navigating technology: _____%
6. Lack of access to technology: _____%
7. Hearing or vision impairments: _____%
8. Fear or suspicion of the utilities_____%

C1b. Are there any other primary reasons customers need CHANGES program assistance (as opposed to receiving assistance directly from their utility)? If so, what percentage of your customers is this a reason for seeking assistance.: **[OPEN]**

C3a. Do you currently serve English-proficient customer populations? [Probe: if so, do you ever record English as the language the service is being provided in and it later shifts to the client's native language?]
1. Yes - Please describe who: **[OPEN END]**
2. No

[IF C3a = 1]
C3b. Has your organization's support of English proficient customers changed over time?
1. Yes, it has changed as follows: **[OPEN END]**
2. No

[IF C3a = 1]
C3c. Do English proficient customers typically need different kinds of help than limited-English proficient customers?
1. Yes, LEP and non-LEP assistance needs vary as follows: **[OPEN END]**
2. No

[IF C3a = 1]

C3d. Has service to English proficient customers impacted your ability to serve limited-English proficient customers?

    1. Yes, service to LEP customers has been impacted as follows: **[OPEN END]**

    2. No

C4. Do you have CHANGES educational materials in all of the languages you need them in?

    1. Yes. And did your organization translate the CHANGES materials for your clients? [Open End]

Section D: Geographic Coverage

D1. We have a list of counties your organization serves through CHANGES. Please describe any geographic limitations within the counties served: [**Open End**]

D2. Are you aware of populations in your area that could benefit from CHANGES services but aren't currently served?

    1. Yes

    2. No

    3. Don't know

    4. ADD NOTES IF NEEDED

[IF D2 = 1]
D3. What populations aren't being served and why? (Select all that apply)

    1. Specific language groups (which ones?): **[OPEN]**

    2. Geographic areas too far from our office (where?): **[OPEN]**

    3. People within our boundary, but we lack sufficient CHANGES funding to support them

    4. Undocumented immigrants who avoid services

    5. Elderly population with mobility issues

    6. Customers outside utility service territories

    7. Customers served by a different CBO that isn't part of CHANGES

    8. Other (please specify): **[OPEN]**

Section E: Service Outcomes & Effectiveness

E1. When cases aren't resolved, what are the main reasons? (Select all that apply)

    1. Customer doesn't follow through on what we've discussed

    2. Utility is unresponsive

    3. Issue is too complex

    4. Documentation is missing

5. Other (please specify): **[OPEN]**

E2a. How often do customers return for additional help after their initial issue(s) have been resolved?
1. Always
2. Often
3. Sometimes
4. Never
5. ADD NOTES IF NEEDED

E2b. Do they typically come back for assistance with a different issue or additional help with their initial issue? (Select all that apply)
1. Different issue
2. Same issue

E2d. Why do you think this specific type of issue recurs?

E2e. What does your organization do to help the customer manage this kind of issue by themselves in the future?

E2f. What can utilities do better to address a customer's issues before they need help from a CHANGES CBO?

E3. How often does your organization provide utility-related assistance without receiving CHANGES compensation?
1. Very frequently (weekly)
2. Frequently (monthly)
3. Occasionally (few times per year)
4. Rarely (once per year or less)
5. Never

E4. What are the typical reasons your organization isn't compensated by CHANGES for utility case assistance services? (Select all that apply)

1. Customer is outside utility service territory
2. Issue doesn't qualify for CHANGES reimbursement
3. Have already helped the customer with another CHANGES issue and can't be reimbursed for additional help
4. No more CHANGES funds available for dispute resolution or needs assistance (reached budget max)
5. Other (please specify): **[OPEN]**

E5a. Do you incur any costs related to CHANGES that are not covered by the program's funding?
1. Yes (please describe) **[OPEN END]**
2. No

[IF E5a = 1]
E5b. How do you manage these financial challenges? **[OPEN END]**

E6a. Do current CHANGES program reimbursement rates adequately compensate your organization for your work?
1. Yes
2. No (please specify why not and what reimbursement rate would provide adequate compensation) **[OPEN END]**

E6b. Has the adequacy of CHANGES Program reimbursement rates changed over time?
1. Yes (please share how) **[OPEN END]**
2. No

E7. Have you done any CHANGES related work (educational events, outreach activities, or case assistance) without getting paid because the program used up all its yearly budget?
1. Educational events (please share topics and number of events) [OPEN END]
2. Case assistance (please share estimated number of cases) [OPEN END]
3. Outreach activities (please share number and type of activities) [OPEN END]
4. No [Open End]

E8. How much additional budget would you need to cover your costs for all of the CHANGES services you provide to customers?

Section F: Program Assessment

F1. What are the main strengths of the CHANGES Program? (Select up to 5)

1. Culturally competent services
2. Individualized case management
3. Community-based approach
4. Holistic assistance
5. Language accessibility
6. Trusted relationships with community
7. Effective utility advocacy
8. Comprehensive service offerings
9. Flexible service delivery
10. Strong coordination among CBOs implementing the program
11. Other (please specify): **[OPEN]**

F2. What are the main weaknesses of the CHANGES Program? (Select up to 5)
1. Insufficient funding
2. Administrative burden
3. Inadequate reimbursement rates
4. Slow payment processing
5. Insufficient training
6. Poor communication with utilities
7. Other (please specify): **[OPEN]**

F3. What are your biggest challenges implementing CHANGES? Please write more details about each challenge, as needed, in the boxes provided. **[have open end for each to allow for expanding upon the answer]**
1. Staffing limitations
2. Funding constraints
3. Language barriers
4. Utility company responsiveness
5. Customer follow-through
6. Program restrictions
7. Other (please specify):
8. No challenges **[Exclusive]**

F4. Do you offer services through other utility programs that are similar to CHANGES or TEAMS services?
1. Yes (please specify) **[OPEN END]**
2. No

F5. In your opinion, is there anything utilities can do to make it easier for you to provide CHANGES services?

    1.   Yes (please explain) **[OPEN END]**

    2.   No

Section G: Contact Information & Follow-up

G1. Do you track staff hours spent on CHANGES? If yes, would you be willing to share that data with us to support our funding re-assessment work?

    1.   Yes, we track staff hours and can share

    2.   No, we don't track or are unable to share

G2. To facilitate the $100 donation to your organization, please share a web link or directions for donation. **[OPEN END]**

Survey Completion

Thank you for completing the CHANGES Program CBO Survey! Your responses will help improve services for limited English proficient customers throughout California.

The $100 donation to your organization will be processed within 2-3 weeks using the information you provided.