

**CHANGES PILOT
EVALUATION**

**DETAILED STUDY
PLAN**




Level 4

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Approvals




Role	Name	Signature	Date
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Table of Contents

Contents

Table of Contents	3
Overview	5
CHANGES and CARE Background	5
CARE	6
Study Objectives	6
Detailed Study Plan	8
Deliverables and Milestone Schedule	8
Milestone Schedule	8
Parameters	9
Evaluation Date Range	10
Study Techniques to Be Employed	10
Data and Document Review	10
Loosely Structured Interviewing	10
Validation Auditing	10
Evaluation Approach	12
Detailed Documentation Set	14
Databases/Data Sets	14
Documents	14

This project involves the evaluation of the California Public Utilities Commission's (CPUC) Community Help and Assistance with Natural Gas and Electricity Services (CHANGES) pilot program in order to assist the CPUC in its determination of whether CHANGES should be adopted as an ongoing program and the appropriateness of continued funding using California Alternate Rates for Energy (CARE) funds.

This document identifies the specific study approach to be followed as part of our analysis, thereby offering stakeholders an opportunity to review and comment on the methodology to be employed in reaching our conclusions.

Overview

CHANGES and CARE Background

CHANGES

The CHANGES pilot program was approved through the CPUC Resolution CSID-004 (http://docs.cpuc.ca.gov/PUBLISHED/FINAL_RESOLUTION/127338.htm). It is providing in-language energy-related (electric and natural gas) outreach, education, and resolution of needs and disputes, to limited-English proficient (LEP) consumers in their preferred languages through a statewide network of community based organizations (CBOs). The pilot program is managed by a third-party contractor, Self-Help for the Elderly (SHE). SHE administers 22 CBOs statewide as subcontractors to the CHANGES pilot program. Currently the CBOs have provided assistance directly to consumers in 17 languages and are able to communicate with them in up to 32 languages. The CPUC is utilizing the CBO network because the CPUC's decision determined that CBOs possess unique insights into the problems faced by specific communities.

The CHANGES pilot program consists of three components: 1. Outreach, 2. Education and 3. Needs and Dispute Resolution. The outreach component advises the community of the existence of the program at a given CBO. The education component includes workshops on payment arrangements, level payment plans, explanation of consumer programs, and measures a person can take to avoid disconnection. The CHANGES pilot program dispute and needs resolution components can assist a consumer to secure payment arrangements; receive referrals to assistance agencies; correct billed amounts, establish or restore service, and recommend measures to avoid service disconnection.

The California Public Utilities Code, Section 739.4 permits utilizing CARE funds to provide information about the CARE program and other assistance programs. Section 739.4 also allows funding for CARE program enrollment and helping low income utility customers and seniors avoid unnecessary disconnections by providing information about assistance programs, payment arrangements and level payment plans. Because there appears to be a potential for a strong connection between the LEP communities and the CARE program population, in CPUC Resolution CSID-004 the CHANGES pilot program was approved for funding using CARE program funds. CSID Resolution-005 identifies that LEP communities are also CARE program eligible. Ninety-two percent of the clients assisted through CHANGES have reported that they are eligible for CARE service and a significant amount of them are seniors.

CPUC Resolution CSID-005 also determined that the CPUC would hire an independent contractor to evaluate the CHANGES pilot program to help the CPUC determine whether the program should continue and if so, whether it should continue to be funded through CARE funds. The resolution determined that the study would be jointly managed by the Energy and Consumer Service and Information Divisions.

CARE

The CARE Program provides a monthly discount, on natural gas and electricity rates, to any and all residential customers that meet the program requirements. The discount reduces customer bills by a minimum of 20%.

CARE applicants are permitted to self-certify that they meet the program's eligibility requirements but their application is subject to being randomly selected for Post Enrollment Verification (PEV).

Customers can qualify by two different methods. First, if the total income of all the people in the household is at or below 200 percent of the Federal Poverty Guidelines (FPG), that household may qualify for CARE. Second, customers may also qualify if they or another person in their household receive benefits from any of the following public assistance programs: Medi-Cal/Medicaid, Healthy Families Categories A & B, Women, Infants, & Children ("WIC"), California Work Opportunity and Responsibility to Kids ("CalWORKS") (formerly Temporary Assistance to Needy Families (TANF)) or Tribal TANF, Head Start Income Eligible-Tribal Only, Bureau of Indian Affairs General Assistance ("BIA GA"), National School Free Lunch Program ("NSLP"), CalFresh (formerly Food Stamps/Supplemental Nutrition Assistance Program); Low Income Home Energy Assistance Program ("LIHEAP"), or Supplemental Security Income (SSI).

Study Objectives

This project involves the evaluation of the CHANGES pilot program in order to assist the CPUC in its determination of whether CHANGES should be adopted as an ongoing program and the appropriateness of continued funding using California Alternate Rates for Energy (CARE) funds.

Level 4 Ventures, Inc. (Level 4) is tasked to review 12 months of data collected concerning the CHANGES pilot program to evaluate its ability to effectively assist Limited English Proficient (LEP) consumers and evaluate the appropriateness of the pilot's use of CARE funds. Included within the scope are the following areas:

- Review of systems and the quality of tracking data;
- Review of the effectiveness of CHANGES in reaching the program objectives;

- Evaluate the extent to which the program activities support CARE and CARE eligible recipients.¹

The stated program objectives for the CHANGES Program are to “provide Outreach, Education, and Need and Dispute Resolution services to Limited English Proficient (LEP) energy consumers in the State of California.”²

The following areas are outside the scope of this study:

- Analysis of risks and controls within the systems that are analyzed;
- Financial auditing of CHANGES related expenditures; and
- Review of the validity of allocation percentages to the various Investor Owned Utilities involved in the pilot (IOUs).

¹ CALIFORNIA PUBLIC UTILITIES COMMISSION RESOLUTION CSID – 005, November 10, 2011, page 8.

² Self-Help for the Elderly CHANGES Program SCOPE OF WORK, page 1.

Detailed Study Plan

Deliverables and Milestone Schedule

The following list contains the deliverables required by either the contract or the vendor proposal:

Deliverable Title	Contract Reference	Date Due
Monthly Status Report	Vendor Proposal	Monthly
Project Charter	Vendor Proposal	DED 5/25/2012 Draft 6/6/2012 Final 6/14/2012
Task Accomplishment Plan	Vendor Proposal	Draft 5/24/2012 Final 6/14/2012
Kick off Agenda	Task 1	5/23/2012
Kick off Minutes	Task 1	Draft 6/4/2012 Final 6/12/2012
Detailed Study Plan	Task 2	Draft 7/4/2012 Final 7/12/2012
Public Meeting Comments	Task 3	7/10/2012
Sample Design and Data Collection Memo	Task 4	7/4/2012
Survey Instruments	Task 4	7/4/2012
Preliminary Results	Task 5	Presentation 7/27/2012 Memo 7/27/2012
CHANGES Pilot Evaluation Report	Task 6/7	DED 7/6/2012 Draft 7/27/2012 Final 8/9/2012
Public Presentation Comments	Task 6	8/15/2012
Data Set	Task 7	8/13/2012
CHANGES Final Pilot Evaluation Report	Task 7	9/1/2012

Milestone Schedule

The following represents the milestone schedule. The primary project schedule constraint is that the report must be completed by 1 September 2012.

Task Name	2nd Quarter			3rd Quarter		
	Apr	May	Jun	Jul	Aug	Sep
Project Pre-Kickoff		◆ 5/22				
Kickoff meeting		◆ 5/31				
Public Workshop: Study Approach				◆ 7/11		
Public Hearing					◆ 8/10	
Present executive briefing					◆ 8/16	
Close out contract					◆ 8/24	
Begin report warranty period					◆ 8/24	

Parameters

The following are the study assumptions, dependencies and constraints.

Assumptions

- The study will make maximum use of existing data and minimize the disruption to staff at the CPUC, IOUs, SHE, and CBOs to the extent possible while still achieving study objectives;
- The study will use a combination of quantitative and qualitative analysis, with quantitative analysis preferred when the data is available or can be reasonably obtained;
- While the study will focus on the primary objectives, if observations lead to additional recommendations, those recommendations will be included in the study results. For these additional recommendations outside the scope of the core study, the CPUC Project Managers will make the ultimate decision about whether they are included in the final report or not based on their assessment of their value to the objectives of the evaluation;
- Recommendations may be proportionate as opposed to binary. So for example, a valid result would include partial funding of CHANGES through CARE funding; and
- Conclusions and recommendations may factor in administrative cost of compliance, so for example if the study results led to a recommendation for 90% funding through CARE, then the added administrative burden of managing 10% funding through an alternate source may result in a recommendation for 100% CARE funding.

Dependencies

- Cooperation by the IOUs, CPUC and SHE in the study, including especially support for the interview process; and
- Access to the CHANGES raw data, minus privacy protected information.

Constraints

The final report must be completed by 1 September 2012.

Evaluation Date Range

Our task is to evaluate CHANGES data for a twelve month period of time. After review of the program data, the selected twelve month window for analysis was May 1st 2011 through April 30th, 2012. Using May 1st as a start date is considered preferable to an earlier start date (e.g., February 1st, 2011) because the analyzed data would be more current and the program would be in more of a steady state, as opposed to start-up phase.

Study Techniques to Be Employed

The following techniques will be applied during the study:

Data and Document Review

1. Review of existing external (to CHANGES) quantitative data
2. Review of existing internal (to CHANGES) quantitative data
3. Review of existing external (to CHANGES) documentation
4. Review of existing internal (to CHANGES) documentation

A complete list of documents/data to be reviewed is included later in this document.

Loosely Structured Interviewing

We define loosely structured interviews as interviews where the interviewer has a set of general topics that should be covered, but uses unstructured and interactive interview techniques to elicit comments. The primary intent is to understand policies, procedures, practices, and history. Interviews will be conducted with:

- CHANGES Program Staff at each of the four IOUs
- CPUC Staff Associated with CHANGES
- Self Help for the Elderly (CHANGES Prime Contractor)
- Milestone Consulting (CHANGES Sub-Contractor)
- Streamline Social (CHANGES Sub-Contractor)
- CHANGES Program Staff at three to four Community Based Organizations (CBOs)

Validation Auditing

Validation auditing will be used to independently confirm information obtained using the above techniques. Validation auditing will consist of:

- Random sampling of CHANGES data and cross validation with IOU records;
- Random sampling of CBO data and validation against internal backup documentation;
- Random sampling of SHE data and validation against internal backup documentation; and
- Manual database review of CHANGES data for apparent internal consistency and integrity.

There are three primary auditable payment events associated with CHANGES:

1. Outreach;
2. Education Workshops; and
3. Individual assistance cases (needs and disputes).

The first two can be validated using randomly sampled paper files during visits with S.H.E. and the various CBOs, however the third category requires validation by either the IOU or the individual clients. Because of privacy and other sensitivities, we have elected to use IOU to validate data rather than contact with individual CHANGES clients. Specifically, as part of our evaluation, Level 4 Ventures, Inc. will use random sampling of CHANGES data and cross validation with IOU records to conduct validation audits of the CHANGES case data (needs and disputes).

Data Selection Methodology

The CHANGES Cases data file will be queried to extract the following fields for all cases with an open date between 5/1/2011 and 4/30/2012 for each of the four IOUs:

Customer_ID
Open_date
Close_date

The result records will be loaded into Excel. Ten percent of the cases for each IOU will be selected using the random() function built into Excel.

Survey Instrument

A user fillable field called “Contact Verified (Yes or No)” will be added to each record in Excel. This will be protected with data validation to be forced to one of the following values:

- Blank (undefined)
- Invalid Account

- Yes
- No

These sample set files will be provided to CPUC, who will then use a vlookup() function to match CHANGES Customer_ID with account number, and the appropriate account number will be added to each record.

The resultant file will be provided by the CPUC to the IOUs for validation. The following instructions will be included with the survey file.

Thank you for your support helping to validate the CHANGES data.
For each account number, please look at the date range to determine if your organization was contacted about that account in approximately that date range.
Generally, assume a contact plus or minus two weeks from the indicated date was valid.
If there was any form of contact, set that row to "Yes."
If there was not any form of contact, set the row to "No."
If the account number is invalid, set that row to "Invalid Account."
If none of the above apply, leave the row blank.
Please return the completed spreadsheet to kyle.devine@cpuc.ca.gov

Additional Validation

In addition, during visits with the various CBOs, Level 4 will spot check randomly selected cases (needs and disputes) with the corresponding physical documentation in the files at the CBO.

Evaluation Approach

Table 1 identifies the specific areas to be examined and the corresponding study techniques (defined above) that will be applied.

Area Examined	Data and Document Review		Interviews	Auditing
	Quantitative Data	Documentation		
Is there a need for a program such as CHANGES in California? To what degree does CHANGES duplicate versus supplement existing programs or services?	●	●	●	
Does CHANGES primarily benefit low-income rate payers?	●	●	●	
To what degree does CHANGES fit within the mandates of CARE?	●	●		
Degree to which the CHANGES program is effective efficient, and low risk:				
• Review of contractual and working relationships between the stakeholders		●	●	
• Definition and tracking of suitable critical success factors	●	●	●	
• Quality oversight		●	●	●
• Fee structure	●	●	●	
• Security and data integrity			●	●
If CHANGES should be continued:				
• Appropriate funding source(s)	●	●	●	
• Appropriate funding levels	●			

Table 1: Evaluation Techniques

Detailed Documentation Set

The following documentation/data will be reviewed and used to help form our evaluation results.

Databases/Data Sets

2010 Census Data

- CensusFullDataSet-California
- Census population-poverty-ethnicity demographics
- Census quickfacts-California

Migration Policy Institute

- California Fact Sheet
- California Fact Sheet – Income
- California Fact Sheet – LEP

American Community Survey 5 Year Summary

CHANGES database (raw table access, sanitized to remove privacy protected data)

CHANGES Monthly Reports; May 2011 through April 2012

Self Help for the Elderly (SHE) [Fee] Agreement with CHANGES Subcontractors; SHE: undated

Statewide Language Survey and Implementation Plan; California State Personnel Board: 2010-2011

Documents

Application 08-05-022, Administrative Law Judge's Ruling Partially Delegating California Alternates Rate For Energy (CARE) Fund Expenditure Oversight; CPUC: December 9, 2010

California Code - Section 7290-7299.8, Dymally-Alatorre Bilingual Services Act

California Public Utilities Code, Section 381-384.2

California Standard Practice Manual, Economic Analysis of Demand-Side Programs and Projects; CPUC: October 2001

Challenges Facing Consumers With Limited English Skills In The Rapidly Changing Telecommunications Marketplace; CPUC: October 5, 2006

CHANGES CBO List; SHE: May 14, 2012

CPUC Decision 12-03-054, Decision On Phase II Issues: Adoption Of Practices To Reduce Number Of Gas And Electric Service Disconnections; CPUC: March 22, 2012

CPUC Resolution CSID – 004; CPUC: November 19, 2010

CPUC Resolution CSID – 005; CPUC: November 10, 2011

Decision 07-07-043, Decision Addressing the Needs of Telecommunications Consumers Who Have Limited English Proficiency

Presentation to Paul Clanon, Continuation of the CHANGES Program; author unknown: August 1, 2011

PY 2011 ESA, CARE, and FERA Annual Report for each of the four IOUs

SDG&E Multi-Cultural Outreach Project Final Report; Catholic Charities: December 2, 2011

SDG&E General Outreach – Customer Assistance Programs, CARE/FERA, ESAP and Medical Baseline; SDG&E: undated

Self-Help for the Elderly CHANGES Program, Scope of Work; author and date unknown