

AN ASSESSMENT OF SERVICE DELIVERY PLANS SUBMITTED TO  
THE TEXAS DEPARTMENT OF HOUSING AND COMMUNITY  
AFFAIRS FOR THE COMPREHENSIVE ENERGY  
ASSISTANCE PROGRAM

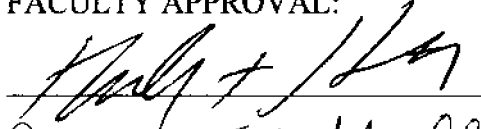
BY

MARY LOU GARCIA

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DR. PATRICIA SHIELDS

FACULTY APPROVAL:

  
\_\_\_\_\_  
Patricia M. Shields

## **ABSTRACT**

### **An Assessment of Service Delivery Plans Submitted To The Texas Department of Housing and Community Affairs For The Comprehensive Energy Assistance Program.**

The paper begins by discussing issues related to poverty including the definition of poverty, the nature and causes of poverty, the effects of poverty, and the public perceptions about the poor. The discussion then focuses on recent changes to welfare legislation particularly those resulting from the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA) of 1996. The paper then focuses on general issues related to program planning and then turns to a discussion of the Comprehensive Energy Assistance Program (CEAP), a program designed to address the issue of poverty and administered by a state agency, the Texas Department of Housing and Community Affairs (TDHCA). The conceptual framework for the research is developed from the requirements of the Service Delivery Plan (SDP) for CEAP, issued by TDHCA. Service delivery plans submitted for Fiscal Year 1999 and 2000 are analyzed to see if they conform to the requirements promulgated by the department. The methodology and results of the research are described in the latter half of the paper. Results show that the majority of SDPs submitted to TDHCA for CEAP do not have all the required elements. Recommendations are, therefore, developed in response to the results.

By Mary Lou Garcia

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## **Chapter One**

### **INTRODUCTION**

Poverty is an experience of doing without that touches every part of life and family. It is a daily struggle that permeates the whole of family life. After all, household income not only determines access to amenities, lifestyles, and choices, it also regulates access to power structures. Household income is a key resource for families and affects health, education, leisure activities, and choice of housing.

It is apparent to the general public and especially to those who work in the social service field that poor people exist. Nevertheless, it is difficult to understand the daily struggles faced by the poor and to be sympathetic to their situation unless experienced first hand. For example, to those individuals more fortunate, it is hard to imagine not having enough money to purchase the necessities of life including food, clothing, medical care, shelter, and utilities. The constant threat of eviction, of having the utilities disconnected, of having the car repossessed, of not being able to find employment because of lack of affordable day care, transportation, or job skills is a reality faced by the poor.

The issue of poverty clearly falls within the scope of public administration. It is a social problem that requires appropriate policy and policy implementation to effectively address the problem. Since the New Deal, the US government and policy makers are expected to respond to a social crisis such as poverty. They are expected to respond to such a crisis by designing comprehensive antipoverty programs that effectively and efficiently transition people out of

poverty. A clear understanding of the effects and causes of poverty is therefore important in order for policy makers to develop more effective strategies for dealing with this complex social problem.

After a century of research intended to help prevent poverty, social investigators and policy makers are still struggling to identify feasible and politically-acceptable solutions to the problems. Many social programs have been developed at the federal, state, and local level to address the issue of poverty. For example, there are antipoverty programs that provide recipients with affordable housing, food, medical insurance, affordable day care, and cash assistance. The Comprehensive Energy Assistance Program (CEAP) is one antipoverty program. CEAP is a utility assistance program funded by the U.S. Department of Health and Human Services and authorized by the Low Income Home Energy Assistance Program (LIHEAP). This act and the purpose of the CEAP program are discussed in further detail in the chapter four.

This paper discusses the issue of poverty including the definitions, the nature and causes, and the effects of poverty. Changes in welfare legislation resulting from the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 which greatly changed the welfare system in the United States are then discussed. In addition, the importance of program planning to designing effective and efficient antipoverty programs is also presented. More specifically, the paper focuses on the administrative mechanism used to plan the Texas CEAP program. The research for this paper concentrates on the administrative mechanism developed by the Texas Department of Housing and Community Affairs (TDHCA) to plan the CEAP program: the Service Delivery Plan. The Service Delivery Plan or SDP is a tool used by

organizations to describe to TDHCA the methodology to plan, implement, and otherwise deliver allowable client assistance as authorized by the CEAP contract, applicable assurances/issuances, and provisions of LIHEAP. A Department-approved plan must be in place before a contract is released and any funding awarded to organizations for administration of the CEAP program. Organizations are monitored annually to insure compliance with their individual service delivery plans, LIHEAP assurances, contract guidelines and financial management control system. The SDP and the annual monitoring process are two methods that hold organizations that receive federal monies to administer the CEAP Program accountable to the tax payers and to the funding source. It is the author's hope that this paper will provide an example of Public Administration in action through the description of an actual public program.

### **Research Purpose**

The purpose of the empirical portion of the paper is three fold. The first purpose is to examine the problem of poverty. The second purpose is to describe the requirements of a service delivery plan (SDP) for the Comprehensive Energy Assistance Program (CEAP). The third purpose of the paper is to assess CEAP service delivery plans using the requirements developed by the Texas Department of Housing and Community Affairs (TDHCA) as a standard of comparison.



## **Description of Chapters**

Chapter two begins by providing a review of the literature on the issue of poverty including the definitions, nature and causes, and effects of poverty. A description of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 which greatly changed the welfare system in the United States is also discussed in chapter two.

Chapter three begins by discussing the importance of program planning in designing effective and efficient responses to the complex problem of poverty.

Chapter four is the setting chapter. The chapter narrows the focus of the research to discuss CEAP in more detail, providing the guidelines and purpose for the program used to create the requirements of the SDP and LIHEAP, the act which authorizes CEAP. It is in chapter four where the conceptual framework is developed.

Chapter five specifies the methodology used for the research. The conceptual framework providing the guiding principle for the organization of the entire paper is summarized. The method of analysis is also described. In addition, the statistical technique and unit of analysis are explained and justified in chapter four. The statistics used and the sampling frame are also detailed.

Chapter six is the results chapter. The chapter describes the statistical results of the quantitative analysis. The final chapter, chapter seven summarizes the paper and presents conclusions and recommendations resulting from the research findings.

## Chapter Two

### REVIEW OF THE LITERATURE

#### Introduction

In order to understand the requirements of the Service Delivery Plan for the Comprehensive Energy Assistance Program, it is imperative to first understand what the program purpose is: to assist households living in poverty to meet their immediate home energy needs with a secondary emphasis on reducing the energy needs and cost of such households. Chapter two examines the issue of poverty in several ways. First, various definitions of poverty are presented. Second, the nature and causes of poverty are discussed. Third, in an effort to understand factors that contribute to poverty, four theories on how societies became modernized are described. Fifth, the five most influential studies on poverty are presented. Sixth, individualistic and structural beliefs of poverty are discussed followed by a description of the effects of poverty. Chapter two concludes with a discussion of the general public's perceptions of who the poor are. The material discussed in chapter two and in the following chapter are intended to build the conceptual framework guiding the research in this paper.

Blackburn (1991, p.12) describes poverty as an experience of doing without that touches every part of life and family. Poverty is a daily struggle that permeates the whole of family life. The scientific study of poverty is one of the oldest continuous topics for investigation in modern social science. Much has been written <sup>1</sup>about the social distribution, incidence, and depth of

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<sup>1</sup> See for example Rainwater(1981), Banfield (1968), Goodwin (1983), Wilson (1987), Jencks (1992), Duncan (1984), Ellwood (1988), Gilder (1981), Murray (1994), Mead (1986 & 1992), McLanahan & Garfinkel (1989), Farber (1989), Schilloer (1984), Beeghly (1983), Axinn & Stern (1988), Caputo (1991), Rosenman (1988), Davidson (1976), Glazer (1995).

poverty. Despite so much research on the topic, the popular mental images of who the poor are, where they live, and how they live, has lagged behind a changing reality. In addition, after a century of research intended to help prevent poverty, social investigators and policy makers are still struggling to identify feasible and politically acceptable solutions to the problem.

It is obvious to those who work with the poor that poverty today remains a real and serious problem in the United States. It is also clear that there is no one face of poverty and that simplistic images of the poor only lead to a misunderstanding of the topic. Therefore, it is critical that policy makers and those who work with the poor understand the nature of poverty in order to devise more effective strategies for fighting this problem.

The purpose of chapter two is to provide a definition of poverty, to explain the nature and causes of poverty, and to describe the effects of poverty. In addition, a discussion of the attitudes and perceptions the general public has towards the poor and issues related to social policy matters will be presented.

### **Definition of Poverty**

“Poverty” and “the poor” are “highly controversial terms whose meanings are shaped by beliefs and current opinions about the nature and causes of poverty” (Blackburn, 1991, p.7). Poverty is a term which has distinct meanings to different people. The words “destitute”, “ill-being”, “powerless,” and “vulnerability” are so frequently used in conjunction with “poverty,” that the conceptual differences between them has become blurred.

A review of the literature reveals that there are varied opinions of what constitutes poverty and that no universally agreed upon definition of poverty has been established. For example, Rowntree(1941), considers families to be in poverty when their incomes are insufficient to obtain the minimum necessities for the maintenance of physical efficiency. Townsend(1979), points out that individuals experience poverty when they lack the resources necessary to obtain the types of diet, participate in the activities, and have the living conditions and amenities which are customary in the societies to which they belong. The Council of Ministers, EEC(1981), holds that individuals live in a state of poverty when their resources are “so small as to exclude them from the minimum acceptable way of life of the member state to which they live” (Blackburn, 1991, p.9). Others like Joseph and Sumpston (1979), say that a family is in poverty if it cannot afford to eat.

In their global assessment of rural poverty, the International Fund for Agricultural Development identified eight broad components of poverty. They include the following:

1. **Material Deprivation** - The first component of poverty includes inadequate food supplies, poor nutritional status, poor health, poor education, lack of clothing and housing, fuel insecurity, and absence of provisions for emergencies;
2. **Lack of Assets** - Another component of poverty identified by the International Fund for Agricultural Development covers both material assets such as land and agricultural inputs and human capital such as education and training;
3. **Isolation** - The third component of poverty tries to capture social, political, and geographic marginalization.
4. **Alienation** - Another component of poverty identified by the International Fund for Agricultural Development results from isolation and exploitative social relations and includes people that lack identity and control, are unemployed and underemployed, lack marketable skills, and have limited access to training and education.
5. **Dependence** - Poor people are often exposed to skewed dependency relationships that can be found for example between landlord and tenant, and employer and employee. This is the fifth component of poverty.

6. **Lack of Decision Making Power** - Another component of poverty identified by the International Fund for Agricultural Development is a result of limited participation and freedom of choice.

7. **Vulnerability to External Shocks** - External shocks is the seventh component of poverty which can be caused by factors found in nature(droughts and floods), markets (collapse in commodity prices and labor supply and demand), demography (loss of a household's earning member, death, and divorce), health (illness of earning member), and war.

8. **Insecurity** - The final component of poverty identified by the International Fund for Agricultural Development is defined as the risk of being exposed to physical violence (Jazairy et al., 1992).

Some social scientists assert that it is possible to define a minimum standard for physical survival and that the needs of the poor do not change through time. These scientists subscribe to an absolute definition of poverty. Other social scientists view poverty as relative to the kind of society people live in and subscribe to a relative definition of poverty. This view implies that poverty is about being poor in comparison to the standard of living of others and about being unable to do the things that are generally accepted as part of a way of life.

In conclusion, the definitions of poverty found in the literature can generally be divided into income-based definitions, basic-needs definitions, and participatory definitions. The income-based approach to defining poverty seeks to specify a level of income per capita in a household below which the basic needs of the family cannot be satisfied. The basic-needs approach to defining poverty specifies a set of minimal conditions of life, usually involving the quality of the dwelling place, degree of crowding, nutritional adequacy and the water supply. Under the basic-needs approach, the proportion of the population lacking these conditions are used to estimate the degree of poverty. In the participatory approach to defining poverty,

respondents from communities are invited to identify their perceptions of their needs, priorities and requirements for minimal secure livelihood.

### *Official Definition of Poverty*

There are two official poverty definitions, one used by the federal government in general and one specifically used by the Office of Management and Budget (OMB). In the mid 1960s, the federal government adopted this official definition of the “poverty line.” The “poverty line” is an amount of annual income estimated to be necessary for minimal economic survival and social participation in the United States (Blank, 1997, p.10). The official measure is a revised version of one first developed by Mollie Orshansky at the Social Security Administration in the early 1960s. This method for measuring poverty has remained the basis of the U.S. definition of poverty ever since and is used by the Bureau of the Census to assess which people were poor during an earlier year (Triest, 1998, p.98). The information generated annually by the Bureau of the Census is viewed as an important measure of the effectiveness of programs and policies to aid the low-income population, the level of unmet economic need in the United States, and the characteristics of those who are most in need. In addition, the “official” poverty estimates determine eligibility cutoffs for certain Federal programs such as the Head Start Program, the Food Stamps Program, the National School Lunch Program, the Child Health Insurance Program, and the Low Income Home Energy Assistance Program.

The calculations of poverty lines used by the Federal Government were based on the minimal amount of money that the Department of Agriculture estimated a family of a given size

needed to spend in order to maintain adequate nutrition. The Department found through a survey of food consumption, that families of three or more persons typically spend about 1/3rd of their income on food. Based on this information, the poverty threshold was set by multiplying the cost of the Department of Agriculture’s “economy” food plan by a factor of three. For smaller families and persons living alone, the cost of the economy food plan was multiplied by factors that were slightly higher in order to compensate for the relatively larger fixed expenses of smaller households. The poverty line is updated each year by multiplying the 1965 line by the increase in the Consumer Price Index to account for changes in inflation on the economy. Therefore, poverty in the United States is officially defined as those people who live in families with cash income levels below the official U.S. poverty line (Blank, 1997, p.10).

The second official definition of poverty is used by the Office of Management and Budget (OMB) to determine eligibility for federal poverty programs. The OMB measure calculated each year by the Department of Health and Human Services is derived by inflating the most recent Census poverty thresholds based on the prior year’s change in the Consumer Price Index for Urban Consumers (Congressional Budget Office, 1985).

Following is the 2000 Health and Human Services Poverty Guidelines:

Size of Family Unit	48 Contiguous States and D.C.	Alaska	Hawaii
1	\$ 8,350	\$ 10,430	\$ 9,590
2	11,250	14,060	12,930
3	14,150	17,690	16,270
4	17,050	21,320	19,610
5	19,950	24,950	22,950
6	22,850	28,580	26,290
7	25,750	32,210	29,630
8	28,650	35,840	32,970

### *Problems With The Official Definition of Poverty*

At least two problems exist with the method used by the Federal Government to calculate poverty. First, since the current definition of poverty was set in the mid-1960s, many noncash public assistance programs have grown in size. These include the Food Stamp program, medical insurance programs such as Medicare and Medicaid, and reduced rental housing assistance programs such as Section 8. The benefits from these programs are not counted in family income and, thus, not considered when calculating a family's poverty status (Blank, 1997, p.10). If benefits from noncash public assistance programs were included, the poverty count would be lower among groups that receive substantial noncash assistance.

The second problem with the current method of calculating the poverty line is that taxes and unavoidable work expenses are not subtracted from a family's resources. If they were included in the poverty calculation, more low-income working families would be counted as poor. There are also no adjustments made for differences in cost-of-living across regions or between urban and rural areas (Blank, 1997, p.10).

Therefore, measuring the incomes of the lowest income groups is not a simple task. Cash income overestimates the number of the poor, and many individuals do not report their total income since doing so might reduce their eligibility for cash and in-kind transfers. In addition, a growing body of literature says that the Consumer Price Index and related official measures overstate the rise in the true cost of living and, therefore, understate the rise in real personal income (Feldstein, 1999, p.37). There is also the problem of classifying someone as poor if his income is only temporarily low. Economists generally view a family's level of consumption as a



better measure of its economic well-being than its current money income (Triest, 1998, p.109). Feldstein (1999) warns that these measurement difficulties should make us cautious about attempting to assess changes in the extent of poverty over time. He also contends, however, that poverty today is a real and serious problem in the United States and other countries.

### **Has Poverty Gotten Worse Or Better?**

Official U.S. poverty statistics based on household income imply that the War on Poverty ended in failure. On the other hand, poverty estimates reliant on household consumption imply that the War on Poverty was indeed a success (Jorgenson, 1998, p.79).

According to the Bureau of the Census, the proportion of the U.S. population below the poverty level of income reached a minimum of 11.1% in 1973. This ratio rebounded to 15.2% in 1983 and has fluctuated within a narrow range since then. These figures give rise to the widespread impression that the elimination of poverty is difficult and even impossible to fight. Jorgenson and Slesnick, on the other hand, showed that the proportion of the U.S. population below the poverty level of consumption fell to 10.9% in 1973. This reduction in poverty was only slightly below the poverty incidence as measured by income in that year, and the poverty ratio for consumption declined further reaching 6.8% in 1983 (Jorgenson, 1998, p.79).

Thus, measures of poverty based on consumption imply that antipoverty programs should not be lightly abandoned as advocated by some conservatives. At the same time, liberal concerns about the alleged persistence of poverty may be misplaced. "While poverty has not been eradicated, as envisioned by poverty warriors in the 1960s, the combined impact of economic

growth and expansion of income support programs has reduced the incidence of poverty to modest proportions” (Jorgenson, 1998, p.80). Triest (1998) contends that the evidence indicates that over the past century, there has been an increase in the percentage of people in the United States who are poor; although, one can reasonably argue that the official census figures either understate or somewhat overstate the increase. For example, according to the official rate, even at the peak of the economic expansion of the late 1980s, there was a higher percentage of the population with income below the poverty line than there was 20 years earlier (Triest, 1998, p.97). Please refer to Appendix E for recent poverty numbers in Texas.

### **Nature And Causes of Poverty**

Views on poverty have differed throughout the years as economic and social conditions changed and as new perspectives emerged. For example, at the end of the 19th century, “poverty was seen as a naturally occurring problem waiting to be solved” (Cheal, 1996, p.18). Poverty was viewed as an unfortunate result of the inevitable workings of the labor market. It was also attributed to the failure of poor people to manage their affairs. Laziness or addiction to heavy drinking and other wasteful expenditures were considered along with unequal access to financial resources as possible causes of poverty in the 19th century.

By the end of the 20th century, poverty was viewed as a “problem for which attempted solutions had proven to be inadequate or counter productive” (Cheal, 1996, p.18). The attention of policy makers was focused mainly on barriers to access financial resources and on limitations in the markets ability to provide adequate family income (Cheal, 1996, p.19).

### *Modernization Theories*

Cheal (1996) presents four theories about how societies became modernized to help understand factors that contribute to poverty. For example, the Standard Modernization Theory suggests that poverty is likely to occur only if “families fail to adapt successfully to change, and especially if they take on deviant or pathological forms” (Cheal, 1996, p.4). The Critical Modernization Theory maintains that “people who make poor choices about careers or relationships or who do not allocate their resources effectively are likely to fall into the bottom level of society, characterized by material want and chronic financial insecurity” (Cheal, 1996, p.4). The Radical Modernization Theory presented by Cheal (1996) contends that poverty is a result of women’s unequal progress relative to men. The Post Modernization Theory, on the other hand, stresses the “structural fragility” of the modern family, the movement toward more individual emancipation, and economic dislocation as factors that contribute to poverty in a modern society (Cheal, 1996, p.10).

### **Poverty Studies**

There are numerous studies that attempt to explain the nature and causes of poverty. The five most influential studies identified by Cheal (1996) are discussed here.

One of the most important early studies of poverty was Seebohm Rowntree’s (1902) description of the poor in the northern English city of York. Rowntree distinguished between “primary poverty” due to insufficient income and “secondary poverty” due to inappropriate

expenditures (Cheal, 1996, p.19). His most lasting contribution was to break down the analysis of the immediate causes of poverty into distinct household types. For example, Rowntree identified the following six causes of poverty in 1899:

1. chief wage-earner was in regular work but at low wages;
2. family contained a large number of children;
3. person who used to be the chief wage-earner died;
4. chief wage-earner was too old or too ill to engage in regular employment;
5. chief wage-earner had only irregular employment which was infrequent or involved short hours; and
6. chief wage-earner was unemployed.

Rowntree conducted two further studies in York in 1936 and in 1950. The principle change discovered by Rowntree between 1899 and 1936 was the high increase in poverty due to unemployment of the chief wage-earner. Rowntree concluded that the primary cause of poverty in 1950 was old age.

Gunnar Myrdal's study in 1944 also proved influential. He concluded that the United States contained groups of people who were "held apart spatially, socially, and economically from the majority of Americans who lived in comfortable circumstances" (Cheal, 1996, p.22). Myrdal referred to the "caste line" between whites and blacks and concluded that discrimination existed as a social barrier which resulted in a large proportion of poor blacks. As a result of Myrdal's work, sociologists came to see poverty as a consequence of uneven and unequal modernization in a stratified economy. The poor were viewed as "those who lagged behind the rest of society in terms of one dimension or more of life" (Cheal, 1996, p.23). This category included racial minorities, people in rural communities, the physically disabled, and the old who had retired from regular employment.

Michael Harrington (1964), was also vital in the poverty research field. He argued that a new kind of poverty had emerged in the United States by the 1960s. The “old poverty” had been a normal condition of life for the majority of people in an economically-underdeveloped society. The “new poverty”, on the other hand, was a “poverty of low aspirations among people who had been left behind in the rush to affluence” (Cheal, 1996, p.23). Harrington called these people “the rejects.” He described them as “victims of an impersonal process that selected some for progress and discriminated against others” (Cheal, 1996, p.23).

Harrington also contended that there had been three distinct historical systems of poverty during the 19th and 20<sup>th</sup> century. The first system was the pauperization of the 19<sup>th</sup> century industrial working class. The second system of poverty which Harrington identified consisted of the pockets of poor people who failed to benefit from the economic abundance between 1945 and 1970. The third era of poverty, according to Harrington, started around 1970 in the United States and was triggered by economic globalization. Harrington argues that late 20<sup>th</sup> century poverty is different from either forms of poverty before it because it does not strike only the classically vulnerable - namely the unskilled and the immigrant with little education.

Enzo Mingione’s 1993 work is also important. He concluded that what is different about the “new poverty” is not the number of poor people or their recent increase but the “apparent lack of any prospect for fundamental improvement” (Cheal, 1996, p.27). Mingione describes the “new poverty” as being “economically and politically intractable” and as “chronic and spatially concentrated and extreme” (Cheal, 1996, p.28).

The final influential study on poverty identified by Cheal was conducted by Peter Townsend in 1979. He argued that poor people did not constitute a uniform stratum in society but, rather, consisted of a variety of social minorities. Townsend defined a social minority as “individuals or families who have some characteristics in common which marks them off from ordinary people and which prevents them from having access to, or being accorded certain rights which are available to others, and who therefore are less likely to receive certain kinds and amounts of resources” (Cheal, 1996, p.24). Townsend stated that policies adopted by society toward minority groups included attempts to manage their numbers and to manage an orderly transition between majority and minority groups.

### **Individualistic And Structuralist Beliefs of Poverty**

The poor, although suggestive of a cohesive population, denotes a group characterized by great diversity. Therefore, the causes of poverty vary from subgroup to subgroup within the population. Generally, however, there appears to be two identifiable views about the causes poverty.

Individualistic beliefs hold the poor responsible for their own plight through their lack of ability, efforts, or morals (Wilson, 1996, p.413). This also includes the psychological or social inequality of individuals and pathologically dysfunctional lifestyles such as drug abuse, alcoholism, and mental illness. Many believe that individuals are poor through their own choices, rational or irrational (Feldstein, 1999, p.40). For example, Feldstein (1991) points out

that some individuals may choose leisure over cash income even though this choice leaves them poorer than they would otherwise be. Some people choose poverty in error. For example, individuals may think they are making a rational decision when in reality their facts are wrong. For example, they may think that they may not like work as much as staying at home but would discover the opposite if they went to work.

Many of the recent discussions about poverty have emphasized certain behavioral problems such as teen pregnancy, poor work habits, parental desertion, or involvement in drugs and crime as defining characteristics for poverty. These discussions, however, do not accurately characterize many low-income families (Blank, 1997, p.13). In fact, many scholars believe that “viewing poverty as a self-inflicted condition ignores the social forces that give rise to poverty” and that policies premised on this assumption will inevitably be misguided (Chafel, 1997, p.458).

Structural beliefs on the other hand, view the responsibility of poverty as not entirely belonging to the poor themselves. They contend that much of the responsibility of poverty belongs elsewhere - namely, with social structural factors and barriers to opportunity. Thus, structuralists see the poor as suffering from circumstances largely beyond their control (Wilson, 1996, p.413). For example, inequality of capitalism as an economic system that causes shortages of jobs and low pay and taxation policies that work against the poor are seen as causes of poverty. In addition, structuralists blame inadequate schools and discrimination as contributing to the plight of the poor.

There exists a small, but serious, amount of very long-term unemployment in the United States that creates poverty and hardship. The most commonly recognized reason for poverty in America, however, is the inability of poor individuals to earn more than a very low hourly wage (Feldstein, 1999, p.39). This outcome is often attributed to inadequate schooling or training. Of course, the problems of low human capital as a source of poverty is not just a matter of schooling but also of low cognitive ability.

Thus, the causes of poverty are complex and varied. Possible causes of poverty mentioned in the literature include lifestyle choices, lack of ability and talents, loose morals and drunkenness, lack of effort, and low wages in some businesses and industries. Poverty may also be caused by exploitation of the poor by rich people, by failure of society to provide enough jobs, and by society's failure to provide good schools.

It is apparent that there is no one face of poverty in American and that the face of the poor has changed over time. Nevertheless, many of these changes are mirrored throughout society among the middle class as well as the poor (Blank, 1997, p.14). For example, there are more single mothers, fewer elderly living in poverty, and smaller family sizes throughout all segments of society. Thus, the poor are an extremely heterogeneous group of persons. One half are either below the age of 18 or over the age of 65. Although poverty among the elderly is at an all-time low, poverty among children remains high and is associated with the growth in single-parent families. In addition, almost 40% of all poor families with children are still headed by married couples. Thus, the poor are both white and black, singled and married, young and old.



## **Effects of Poverty**

As mentioned at the beginning of this paper, poverty is an experience of doing without that touches every part of life and family. After all, household income not only determines access to amenities, lifestyle, and choices. Household income also regulates access to power structures and is a key resource for families that affects health, education, leisure activities, and choice of housing.

### *Health Issues*

The daily experience of doing without not only brings material hardships. It also affects the access individuals have to health care. There exists a clear association between poverty and health, and health differences are obvious among different social groups (Blackburn, 1991, p.29). Poor diets are also a reality for many families living in poverty. Problem diets are often attributed to inefficient food purchasing and irresponsible budgeting, a preference for unhealthy food, and a lack of knowledge concerning the value and composition of a healthy diet (Blackburn, 1991, p.51).

### *Mental Health Issues*

Poverty has been described as creating social and emotional needs, relative powerlessness, and lack of freedom. Research indicates that those social groups who suffer the poorest mental health are also the groups who commonly find themselves in poverty (Blackburn,

1991, p.108). For example, higher levels of unhealthy behaviors such as alcohol and cigarette smoking have been attributed to low income groups. In addition, feelings of stress and powerlessness is strong in the daily experience of individuals living in poverty. Poverty itself is also likely to bring about more severe life events such as bereavement, loss of employment, and threats of loss due to serious illness or accidents for families (Blackburn, 1991, p.111). This situation partly explains the higher risk of depression and mental illness among low income groups. In addition, social and emotional deprivation may weaken a person's beliefs that he can exercise personal control. The stress of poverty has also been associated with higher rates of child abuse (Blackburn, 1991, p.116).

### *Housing Issues*

The quality of the home environment has an important bearing on a person's quality of life. The home environment also has a pervasive effect on a person's health and on their relationships with other people. In addition, housing protects people from physical and mental illness. "Like food and eating, poor housing affects health directly through physiological processes, and indirectly through behavioral and psychological processes" (Blackburn, 1991, p.77). Housing conditions can also help or hinder parents in their role as caregivers. In addition, home ownership obviously can be a major source of personal wealth since a home can be used or invested as collateral or as a way of passing on wealth. Therefore, housing is a marker of social status and social mobility. It is a key resource that can "mediate a family's access to other health

resources such as leisure, transportation, and health care facilities” (Blackburn, 1991, p.77).

Unfortunately, many low income families are confined to housing that is badly designed and built and in a poor state of repair. This situation means that fuel bills may be increased through damp condensation problems and poor insulation. In fact, “together with housing costs, fuel costs account for a significant part of the weekly household expenditures for low income families” (Blackman, 1991, p.88). Fuel costs account for a greater proportion of the expenditures of low income families than higher income families and, thus, are a major source of debt for low income families.

Thus, poverty is a daily struggle that permeates the whole of family life and that has some serious effects on all levels of existence.

### **Feminization of Poverty**

“The face of poverty has altered dramatically over the past 25 to 30 years” (Pressman, 1998, p.57). A picture of the poor a quarter century ago would show an elderly couple living in Appalachia or on a farm in the South or Midwest. Today, poverty displays a different face - a distinctly feminine one (Pressman, 1998, p.57). No type of poverty is more characteristic of discussion of postmodern families like that of the female-headed sole-parent family (Cheal, 1996).

p.58). The prevalence of poverty among sole-parent families challenges modern ideologies in three major ways:

1. it challenges the assumptions about the necessary connection between reason, individual choice, and socioeconomic progress;
2. it challenges the view of modern societies as child-centered societies, and
3. it challenges the idea that modern societies are self-regulating systems that are capable of solving their social problems (Cheal, 1996, p.59).

Today, with welfare reform legislation<sup>2</sup>, the fate of sole-parent families hangs in the balance. On the one hand, welfare reform legislation is driven by a desire to force single mothers off the welfare rolls. On the other hand, some policy makers are stalled by a fear of further disadvantaging the already disadvantaged children. "Postmodern policy makers hold out no hope of solving a problem for which the cure may be worse than the disease" (Cheal, 1996, p.61).

More children now grow up in female headed sole-parent families as a result of separation or divorce than at any other period in U.S. history. Unfortunately, children who live in households headed by separated or divorced women are likely to be poorer than children in husband-wife families. Married couples with children also have a broad housing advantage over separated or divorced women with children. For example, two parent families in the United States are more than twice as likely to own their own home, more likely to live in a single home, and their dwellings are younger on average than the homes of families headed by separated or

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Reconciliation Act (PROWRA) of 1996.

divorced mothers (Cheal, 1996, p.65). In addition, separated and divorced mothers pay a smaller proportion of their total income into financial security plans than do married couples. The absolute difference in their financial security payments is also very large (Cheal, 1996, p.68). As the number of single-parent families has grown in the United States, single mothers and their children have increased as a share of the poor population (Blank, 1997, p.18). In fact, among all age groups, race groups, and family types in the United States today, a single mother with children has the highest probability of being poor.

Unfortunately, statistics indicate that previously married women with children in America are five times as likely as currently married women with children to be on welfare (Cheal, 1996, p.69). The major difference between currently married and previously married mothers does not lie in their labor force participation levels. The difference lies in the fact that when they are not employed, previously married mothers depend primarily on public income transfers. However, currently married mothers depend mainly on private intra-family income transfers, presumably from their husbands.

Thus, as poverty becomes feminized, the proportion of children in poverty rises. Research indicates that impoverished children are more likely to be unproductive and impoverished adults. This outcome makes poverty a vicious cycle. In addition, because welfare benefits go primarily to women and their families, a greater body of poor women require either a dramatic rise in welfare spending or sharp program cutbacks.

In conclusion, the underlying reasons for the feminization of poverty appears to include

rising divorce rates, the rising independence of women resulting in more never married mothers, the changing age and racial structure of the population, and the rising labor force participation by married women.

### **The Elderly**

At the end of the 19<sup>th</sup> century and in the first half of the 20<sup>th</sup> century, the elderly were a poverty-stricken section of the population. After WW II, public pensions and other programs for the elderly have increased. The growth occurred primarily in Social Security retirement benefits combined with other assistance programs aimed at the elderly. In addition, an expansion of private pension among workers occurred throughout the early 1980s. Hence, more elderly persons receive private-pension income now than in the past.

The elderly today enjoy a more favorable position than any other groups such as households headed by women (Cheal, 1996, p.157). They are one of the biggest success stories for public policy since expansion in government benefits to the elderly has resulted in very low poverty rates among this group (Blank, 1997, p.20). The elderly who remain poor are largely older widowed or divorced women who accrued little pension or Social Security income on their own and who now find themselves destitute following a husband's death.

In recent decades, programs serving children and their families have grown more slowly than other programs in the United States. Spending on pensions, however, has increased rapidly. According to Cheal (1996) this occurrence is due to an increase in the number of older people in

recent years. Studies have also shown that the public supports governmental assistance for the elderly over other groups (Klemmack, 1983, p.310). For example, the elderly were perceived to be more in need of, more deserving of, more grateful for, and less responsible for problems resulting in the need for energy assistance than were persons in other categories (Klemmack, 1980, p.307).

### **Racial And Ethnic Differences Among The Poor**

Statistics indicate that members of racial and ethnic minority groups in the United States are poor in disproportionate numbers (Blank, 1997, p.21). The reasons cited are many and include the following:

1. Blacks have been particularly subject to housing discrimination which has prevented them from following the road pursued by urban white families who moved to the suburbs when jobs started shifting there from the cities;
2. Minority workers still face exclusion and discrimination from many employers, limiting their wages and employment options;
3. Minority workers have lower levels of formal education on average; and
4. Recent immigrants face cultural and language barriers and skill barriers when searching for a job (Blank, 1997, p.21).

### **Public Perceptions About The Poor**

Generally, there appears to be three distinct positions that influence public perceptions about the poor. The conservative view posits that welfare programs encourage dependency and that participation in welfare programs results in a reduction in work effort. The principle way to solve the problem of not working according to the conservative position is through “work fare”

programs. Liberals generally see the problem of the urban underclass as having been exposed by an unbalanced welfare state. Liberals believe that high benefits were funneled toward other groups whose needs are not as great. The radical position views the rules and practices of welfare bureaucracies as demeaning and exploiting their clients and robbing them of self-respect and autonomy. The solution according to radicals is a universal guaranteed income.

For centuries, Americans have distinguished between the “deserving poor,” who are trying to make it on their own and the “undeserving poor,” who are lazy, shiftless, or drunken and prefer to live off the generosity of others. As Walter Lippmann argued 70 years ago, our opinions and behaviors are responses not to the world itself, but to our perceptions of that world. “It is the pictures in our heads that shape our feelings and actions, and these pictures only imperfectly reflect the world that surrounds us” (Gilens, 1996, p.515). Lippmann continues to explain that just as important, our experience of the world is largely indirect. Our opinion, Lippmann wrote, “cover a bigger space, a longer reach of time, a greater number of things, than we can directly observe” (Gilens, 1996, p.515). They have, therefore, to be pieced together out of what others have reported, he concludes.

Survey data show that public perceptions of poverty are wrong in at least one crucial respect. Americans substantially exaggerate the degree to which blacks compose the poor. (Gilens, 1996, p.516). In addition, white Americans with the most exaggerated misunderstandings of the racial composition of the poor are the most likely to oppose welfare. Gilens (1996) found that the correspondence of public misunderstandings and media



misrepresentations of poverty reflects the influence of each upon the other. He concluded that American's view on poverty and welfare are colored by the belief that economic opportunity is widespread and that anyone who tries hard enough can succeed. Gilens (1996) also found that the public is more sympathetic toward some age-groups of poor people than others.

For example, working-age adults are expected in the public's view to support themselves.

Poverty among this group is viewed by many as indicating a lack of self-discipline. In addition, Gilens (1996) concluded that children and the elderly are, to a large extent, not held to blame for their poverty. These groups are viewed much more favorably as candidates for governments assistance. Gilens (1996) also found that differences in personal exposure to poor people of different races appeared to have little impact on perceptions of the poor as a whole. The political consequences of these misrepresentations are clear. A true reflection of social conditions would show the poverty population to be primarily non-black. "By implicitly identifying poverty with race, the news media perpetuate stereotypes that work against the interests of both poor people and African Americans" (Gilens, 1996, p.538).

An extensive body of descriptive sampling research has detailed American attitudes toward welfare programs and welfare spending. What can be concluded from this research is that the American public overwhelmingly subscribes to the principle of helping the needy, supports spending for education and health programs, and favors assistance for the elderly, the disabled, and children. However, the public seems less enthusiastic in their support of public assistance or cash support for able-bodied adults. "These polls show fairly widespread support

for the idea of time limits, work requirements, and various eligibility restrictions, particularly those that seem to reinforce the values of work, family, and self-sufficiency” (Pereira, 1998, p.399).

Various beliefs about the nature of poverty and the fairness of the opportunity structure in American also have figured prominently in explanations of public support for welfare programs and spending (Pereira, 1998, p.400). These beliefs include economic individualism, the tendency to favor an individualist as opposed to a structuralist interpretation of poverty and inequality. This belief appear to account for significant variations in public support for welfare programs in the U.S. There are also values of equality and egalitarianism in U.S. society which translate into beliefs about the social rights of citizens and the social responsibilities of government. These beliefs have been linked to favorable views of welfare programs and welfare spending, especially among the disadvantaged. The final view which figures prominently in the explanation of public support for welfare programs and spending is the view that social welfare programs, especially public assistance, are ineffective and wasteful, rewarding lack of effort on the part of recipients and failing to secure accountability on the part of program administrators. This view has also been shown to be an important determinant of public support for welfare programs.

Whether the problem of poverty is resolved depends, at least in part, on developing ideologies that question negative stereotypes and that counter rather than legitimate the status

quo. Individualist explanations must be replaced with structural ones that acknowledge the need for economic reform. The responsibility for poverty does not entirely belong to the poor themselves. Much of the responsibility for poverty belongs elsewhere.

The next chapter focuses on antipoverty policy issues and specifically on changes made to the welfare system as a result of the Personal Responsibility and Work Opportunity Reconciliation Act (PROWRA) of 1996. In addition, the importance of program planning to developing and designing effective and efficient antipoverty programs is discussed.

## **Chapter Three**

### **SOCIAL POLICY ISSUES AND PROGRAM PLANNING**

#### **Introduction**

The purpose of chapter three is to discuss how the Personal Responsibility and Work Opportunity Reconciliation ACT (PROWRA) of 1996 changed the welfare system in the United States. The information presented in chapter three is important since legislation has a direct impact on how welfare programs are designed and funded. In addition, the importance of program planning to developing and designing effective and efficient programs to combat poverty are discussed.

#### **Social Policy Issues**

Feelings of frustration, anger, and a desire for something different in dealing with poverty in the United States is widespread. Two questions are asked over and over. Why has poverty been so intractable and persistent in the United States, and how can we design and implement a more effective system of antipoverty programs? Unfortunately, there is no one answer to the problems of poverty. Poor people are too diverse, and their problems are too complex. However, the changing face of poverty in the United States demands programs and policies that

are appropriate to today's problems. The use of public assistance for a response to economic vulnerability suggest that an antipoverty strategy should focus on structural versus behavioral factors (Caputo, 1997, p.24).

Gans proposed that such an antipoverty policy should emphasize four principles:

1. The policy must be job-centered;
2. Most jobs will have to be created by the private sector;
3. Programs should be universal, serving everyone, rather than specific and targeting only the poor; and
4. Antipoverty policies should focus on economic criteria and thus be race blind and gender neutral.

Policies which Gans believe meet the above criteria include raising the minimum wage, expanding earned-income tax credits, promoting skills training programs, and government providing incentives for the private sector to promote work sharing and to upgrade part-time work (Caputo, 1997, p.24).

### **Personal Responsibility And Work Opportunity Reconciliation Act (PRWORA) of 1996**

No government policy has as many supporters and opponents as does social welfare policy in the United States. To supporters, social programs represent the positive contribution of the government. These contributions include providing the basic necessities of food, housing, health care to the needy, and utility assistance. Contributions also include providing income payments to the retired, the disabled and the unemployed and investing in human capital through education, training, and unemployment programs. To opponents of the welfare state, the above social programs are viewed as unnecessary government intervention, as failed programs that

discourage initiative and encourage dependence, and as costly programs that are beyond government budgetary control.

“The debate over the shape and size of social programs has occurred in every Congress in every administration since the inception of the programs” (Browning, 1991, p.1). In 1996, the welfare system in the United States was changed dramatically with the passage of the Personal Responsibility and Work Opportunity Reconciliation Act (PRWORA). This new welfare reform legislation represents some level of agreement among liberals and conservatives that the U.S. welfare system needed reform (Pereira, Joseph, Ryzin, & Gregg, 1998, p.398). Changes enacted through PRWORA affected children with disabilities receiving Social Security Income Disability Benefits (SSI), families receiving cash assistance through Aid For Dependent Children (AFDC), non-working adults receiving benefits from the Food Stamps program, legal aliens receiving benefits from Food Stamps, SSI, and AFDC, and made changes in the country’s Child Support Enforcement System.

The most important and far reaching changes enacted under PRWORA, however, are those made to the 61 year old AFDC program that provided cash assistance to poor families with children (Pavetti & Wemmerus, 1999, p.517). PRWORA eliminated the AFDC program and the Job Opportunities and Basic Skills (JOBS) training program and replaced them with a block grant to states to create a work-oriented Temporary Assistance For Needy Families (TANF) program.

TANF is 100% federally funded. A state’s allocation, however, is reduced if states fail to

meet a fiscal maintenance-of-effort requirement and required work participation rates. For example, PRWORA requires states to meet steadily increasing work participation rates to receive their full TANF allocation. In FY 1997, states had to have 25% of their single parents participating in work activities for a minimum of 20 hours per week. By FY 2002, PRWORA increased the severity of sanctions imposed either by lengthening the minimum sanction period or increasing the penalty. Thirty-six states now impose “full-family sanctions” for initial or continued non-compliance with work program mandates (Pavetti & Wemmerus, 1999, p.521). The primary purpose of sanctions is to send a message that receipt of cash assistance carries with it a set of expectations, especially regarding work.

Under TANF, expectations for families with children are quite different than they were under previous efforts to help families with children, creating a new social contract for families in need of government assistance. For example, TANF is intended to provide short-term work-oriented assistance to poor families with children. Recipients are required to work once they are job ready and are eligible to receive assistance for only 60 months out of their lifetime. States, however, can opt to impose a shorter time limit. Historically, cash assistance was available to families as long as they met the eligibility criteria. Concerns that welfare had become a “way of life” for a large number of families, however, led to policies to limit the number of months families can receive assistance. Nevertheless, states can exempt up to 20% of their case loads from the time limit requirements and may also use their own funds to provide assistance after 60 months (Pavetti & Wemmerus, 1999, p.521). PRWORA gives states unprecedented authority to

decide how they will use their TANF funds. It does, however, provide broad programmatic guidelines that have shaped the design of many state TANF programs.

Elements of PRWORA include work first which is the core of most TANF programs. PRWORA is built on a philosophy that any job is a good job and that most program efforts are geared toward helping recipients enter the labor force as quickly as possible (Pavetti & Wemmerus, 1999, p.518). The second element of PRWORA is making work pay by increasing rewards and reducing the costs associated with working. The old AFDC program was structured so that recipients could easily be worse off if they worked. To better support recipients efforts to find and maintain employment, all but 10 states have implemented earned income-disregard policies. These policies allows TANF recipients to keep more of their earned income for a longer period of time (Pavetti & Wemmerus, 1999, p.520). Many states have also implemented a number of policies to reduce the cost of working. These policies include providing increased expenditures for child care, addressing transportation barriers, and expanding health insurance coverage. The final element of PRWORA includes more stringent sanctions with the effort of raising the stakes for noncompliance. Sanctions have, therefore, become an increasingly important mechanism for reinforcing the importance of work under PRWORA.

Thus, the “passage of PRWORA signaled a break with the past” (Pavetti & Wemmerus, 1999, p.535). Families who could once receive assistance based primarily on their income and assets now find themselves subject to a new social contract based on work. While this shift in no way guarantees that welfare recipients will fare better than they had in the past, proponents of the



new legislation believe that it provides an opportunity to greatly improve the lives of poor families with children. In an environment where work is the norm for most mothers, employment provides one of the few options for increased self-sufficiency for poor families. Pavetti and Wemmerus (1999), believe that the ultimate success or failure of welfare reform will rest on the United State's ability to create and sustain a new work-based safety net that adequately responds to the complex labor market realities and life circumstances of families who have previously depended on the welfare system for support. Welfare reform has specified a new set of expectations for poor families with children. "The challenge ahead is to provide families with the resources and services they need to be able to meet those expectations and to modify those expectations when it is in the best interest of families to do so" (Pavetti & Wemmerus, 1999, p.535).

Thus, welfare reform is still very much a work in progress. While much has been accomplished, the creation of a new social contract is far from complete. Critics of PRWORA contend that many of the worst characteristics of the bureaucratic structure created by federal and state governments over the years have been preserved, albeit in an altered form under welfare reform (Lens & Pollack, 1999, p.65).

### **Program Planning**

Throughout the history of the United States, many social programs have been developed at the federal, state, and local level to address the issue of poverty. For example, there are

antipoverty programs providing recipients with affordable housing, food, medical insurance, affordable daycare, and cash assistance. The Comprehensive Energy Assistance Program (CEAP) is one antipoverty program.

All social programs come with a set of mandates. For example, CEAP is administered through a contractual system. One of the many requirements for receiving CEAP funding is for organizations who desire to receive monies to administer the program to submit a service delivery plan (SDP) to the Texas Department of Housing and Community Affairs (TDHCA). The SDP describes the methodology to plan, implement, and otherwise deliver allowable client assistance as authorized by the legislation applicable to the CEAP program. After the SDP has been approved, funding is released by TDHCA to the contractual organization. Once funding is received, individual programs can begin to implement services detailed in the SDP including assisting clients with their utility bills. Therefore, formal planning is an extremely important element of social programs addressing poverty.

Formal program planning includes setting objectives, planning strategy, developing a philosophy, and establishing policies and procedures. In addition, the development of budgets is included in the formal planning process. Budgets are described by Mikesell (1995) as “simply plans translated into their financial implications.” “Budgets can be clear statements of plans, priorities, performance, and cost as well as the basic template for administrative control” (Mikesell, 1995, p.165).

Formal planning is beneficial because it creates more effective and efficient organizations

and programs. It also makes public administrators better planners by encouraging experimentation. Formal planning also forces the setting of objectives, reveals and clarifies future opportunities and threats, provides a framework for decision-making throughout an agency, and results in a comprehensive plan which provides a basis for necessary performance.

The next chapter focuses on the Low Income Home Energy Assistance Program (LIHEAP) and one of the antipoverty programs authorized by this act: The Comprehensive Energy Assistance Program (CEAP). The CEAP Program is described and the conceptual framework for the research is explained and developed.

## **Chapter Four**

### **SETTING**

#### **Introducing The Conceptual Framework**

Chapter four introduces and develops the research purpose and the conceptual framework for the research. The chapter also describes the research setting.

The conceptual framework is a tool that drives the collection of data for the research and thereby provides an overall picture of the research. Common conceptual frameworks include working hypotheses, conceptual categories, practical ideal type, models of decision making, and formal hypotheses (Shields, 1996). Conceptual frameworks are classified by the purpose of the research being carried out and are linked to certain types of research questions. The purpose of the empirical portion of the paper is three fold. The first purpose is to examine the problem of poverty. The second purpose is to describe the requirements of a service delivery plan (SDP) for the Comprehensive Energy Assistance Program (CEAP) issued by the Texas Department of Housing and Community Affairs (TDHCA). The third purpose of the paper is to assess CEAP service delivery plans using the requirements set by TDHCA as a standard of comparison. Since the purpose of the research is to determine how closely the service delivery plans submitted by CEAP contractors in Texas are to the requirements issued by TDHCA, the research purpose is gauging (Shield, 1996).

With exploratory research, the research question asks to gauge how close a process or policy is to the ideal or standard. For instance, in this case, the research question is how close are CEAP service delivery plans to meeting the requirements established by TDHCA. The type of conceptual framework that best applies to this type of research is the practical ideal type. This is an abstract tool in which standards or points of references are developed. The ideal type is organized by categories or elements that make up the ideal. Once the practical ideal type has been designed, it can be used as a standard by which something (in this case the SDP) can be measured. In this research, the CEAP service delivery plans are reviewed and assessed through comparison with the standard or requirement provided by TDHCA. The development of a practical ideal type is useful in public administration since it provides a point of departure for policy recommendations. In addition, a practical ideal type offers benchmarks with which to understand and improve existing programs and the implementation process of these programs.

Before the requirements of the CEAP service delivery plan can be understood, it is first important to understand the legislation that funds CEAP. Understanding CEAP is important because the requirements for the service delivery plan are a direct result of legislative mandates. The literature review of this paper provides an introduction to the issue of poverty and the importance of program planning in developing effective and efficient programs to combat poverty. The aforementioned constitutes the larger meta-framework or policy framework. The information in chapter four is necessary to understand CEAP as it is described and linked to the conceptual framework.

## **The Comprehensive Energy Assistance Program (CEAP)**

Several programs designed to combat poverty are established by The Low Income Home Energy Assistance Act (LIHEAP) of 1981 (42 U.S.C. Section 8621 *et seq*). The purpose of LIHEAP is to assist low income households, in cases of extreme weather, who are in danger of losing access to energy. One particular program established by LIHEAP is the Comprehensive Energy Assistance Program (CEAP).

CEAP is an energy assistance program designed with the goals of:

1. assisting households in developing goals for self-sufficiency through case management and a co-payment utility plan;
2. providing relief to those low income elderly and persons with disabilities most vulnerable to the high cost of energy for home heating and cooling;
3. providing one-time assistance in an energy related crisis; and
4. addressing inefficient home heating and cooling appliances through a retrofit, repair, and replacement program.

Households whose income do not exceed 125% of the federal poverty income guidelines as published in the Federal Register for the U.S. Department of Health and Human Services are eligible for the program.

To meet the above four goals of the program, CEAP is comprised of four components. The four components include the Energy Crisis Component, the Co-Payment Component, the Elderly and Disabled Assistance Component, and the Heating and Cooling Component. To provide a better understanding of the CEAP program, the next section describes each component.

### *Energy Crisis Component*

The goal of the energy crisis component of CEAP is to provide assistance during a bona fide energy crisis. A bona fide energy crisis exists when extraordinary events or situations resulting from extreme and unanticipated weather conditions and fuel supply shortages have depleted or will deplete household financial resources thus creating an energy burden. Such energy burden must pose a threat to the health or well-being of the household, particularly the elderly, disabled, or very young children. In addition, the assistance provided under this component of CEAP must result in the resolution of the crisis. For example, it is not unusual to see an elderly person with access to an air conditioner not using the unit because of fear of not being able to pay the utility bill. If the person asks for help during a bona fide energy crisis as described in the agency's SDP, the person will receive assistance from the energy crisis component of CEAP.

Payments allowable under the energy crisis component of CEAP include temporary shelter not to exceed \$350.00 per household due to inoperable heating/cooling appliances or because supply of power to the dwelling is disrupted causing temporary evacuation of household members; emergency deliveries of fuel not to exceed \$150.00 per delivery per household; and purchase of portable heating and cooling units not to exceed \$1000.00 per household. Funds

under the heating and cooling component of CEAP can not be used to weatherize dwelling units, for medicine, food, transportation assistance, income assistance, or to pay for penalties or fines assessed to clients.

### *Co-Payment Component*

The intent of the co-payment component of CEAP is to achieve energy self-sufficiency in terms of long-term energy affordability for low income households. The program must target clients with the least income and the greatest energy need. For example, a single mother with children employed part-time and unable to pay her electric bill is eligible to receive assistance under the co-payment component of CEAP.

Energy affordability as defined in the co-payment component is achieved when a client household has the financial capacity to meet its energy obligations. Organizations administering CEAP programs must enroll CEAP co-payment clients in the program for a minimum of six months. Clients can, however, be terminated at any time between six and twelve months if the goal of energy self-sufficiency has been achieved.

Under the co-payment component of CEAP, utility payments are made on behalf of clients to utility vendors on a sliding scale system developed by each organization. For utility bills to be paid, however, each co-payment client is required to have a client service agreement on file to provide direction and focus during the service delivery period. The client service agreement becomes a contract between the organization and the client describing the target



problems, goals, and strategies and the roles and tasks of the participants. The agreement is guided by a timeline and serves as a basis for providing accountability to both the client and the organization which is providing service to the client.

### *Elderly and Disabled Assistance Component*

The intent of the elderly and disabled assistance component of CEAP is to provide help to those households most vulnerable to fluctuations in energy cost. Assistance under this component is targeted to those households who are unable to achieve full energy self-sufficiency through other means. For instance, a disabled person who's only income is a monthly disability check and who is not expected to have additional income would be eligible to receive assistance under the elderly and disabled component of CEAP.

Elderly and disabled clients may receive benefits to cover up to 100% of four single energy source bills for four billing periods within a contract year under this component of CEAP. Payments must be limited to the highest consumption months during which time the client is most vulnerable to energy-related stress.

### *Heating and Cooling Component*

The intent of the heating and cooling component of CEAP is to assist clients in achieving energy self-sufficiency by addressing inefficient heating and cooling appliances. For example, clients may have a high energy burden due to inefficient appliances in the home. In addition,

inordinately high energy bills during the heating or cooling season would indicate the need for an assessment of the condition of the appliance in the client's home. The retrofit, repair, and/or replacement of a heating or cooling appliance under this component of CEAP must be cost effective and must result in a reduction of energy consumption. Only clients previously receiving services under one or more of the other CEAP components during the same contract year are eligible for services under the heating and cooling component.

Eligible services under the heating and cooling component of CEAP include cleaning, tuning and evaluation of systems, repair and replacement of existing components, and replacement of unsafe and inefficient systems. Systems which can be repaired, replaced or retrofitted include cooling systems such as central air conditioners, window air conditioners, and evaporative coolers; heating systems, such as central/wall floor furnaces, space heaters, and wood burning stoves; water heaters; and refrigerators. The maximum allowable expenditure per household under the heating and cooling component of CEAP is \$1000.00

### **The Texas Department of Housing and Community Affairs**

The Texas Department of Housing and Community Affairs (TDHCA) is the state's lead agency responsible for affordable housing, community development and community assistance programs. In addition, the Department is responsible for the regulation of the state's manufactured housing industry. TDHCA annually administers funding in excess of \$500 million. The majority of the Department's funding is derived from mortgage revenue bond

financing and refinancing, federal grants, and federal tax credits. TDHCA's main office is in Austin. In addition to the main office there are five field offices, various technical assistance centers, and eight field office for the Manufactured Housing Division located throughout Texas.

TDHCA's mission is "to help Texans achieve an improved quality of life through the development of better communities." To achieve this mission, TDHCA's services include a broad number of services including low interest mortgage financing, emergency food and shelter, rental subsidy, weatherization, economic development, the provision of basic public infrastructure for small rural communities, and energy assistance. The Department also provides titling, licensing, inspection, and enforcement services in connection with manufactured homes. Therefore, CEAP is a small part of TDHCA.

In FFY 94, TDHCA introduced the CEAP Program. Effective September 1, 1995, TDHCA has been authorized by the Office of the Governor to submit an annual application and plan on behalf of the State of Texas to the U.S. Department of Health and Human Services to receive funding for programs authorized by the Low Income Home Energy Assistance Act of 1981, (LIHEAP), including CEAP. The Texas legislature has designated TDHCA as the single state agency to administer this program.

TDHCA provided the U.S. Department of Health and Human Services with it's most recent state plan and application in October 1999 (see appendix A). The state plan and application details how TDHCA proposes to design and administer programs authorized by LIHEAP. TDHCA utilizes a network of public and nonprofit agencies throughout Texas to

provide CEAP services in 254 counties. As of January, 2000, there were 51 agencies in Texas designated as CEAP grantees.

In order to become a CEAP grantee in Texas, agencies must submit a service delivery plan to TDHCA for review and approval. Only after the plan has been approved by TDHCA will a contract with the agency be signed and funding released.

### *Service Delivery Plans (SDP)*

Umbrella organizations that award federal, state, or local funds must have some method of determining what agencies will be the most worthy recipient of the funds. A good method for determining the worthiness of potential federal, state, or local fund recipients is through the development of a Service Delivery Plan. The Service Delivery Plan or SDP is a tool developed by TDHCA and used by organizations applying for CEAP funding. In the SDP, organizations describe the methodology to plan, implement, and otherwise deliver allowable client assistance as authorized by the CEAP contract, applicable assurances/issuances, and the provisions of LIHEAP. Staff responsible for writing the plan may include the agency's executive director or planning director.

Through a review process developed by TDHCA service delivery plans submitted to the Department for CEA funding are assessed for required elements. TDHCA gives special consideration in designating local administering agencies to any local public or private nonprofit agency: 1) which was receiving federal funds under LIHEAP or Weatherization Assistance

Program under the Economic Opportunity Act of 1964 or any other provision of law in effect the day before PL 97-35 was enacted on August 13, 1981; 2) with experience and capacity in operating energy assistance programs or experience in assisting low income individuals in the area to be served; and 3) with the capacity to undertake timely and effective Energy Assistance Programs. Nevertheless, no monies will be released by TDHCA to any agency until an approved SDP is on file with the Department. Thus, the SDP can be an important method by which TDHCA can assure itself of choosing the agencies most worthy of receiving CEAP funding. In addition, the SDP is a good planning instrument for the agencies requesting the funding.

### **Conceptual Framework Summary**

As stated at the beginning of chapter four, the conceptual framework for this research is the practical ideal type. The practical ideal type is an abstract tool in which standards or guidelines are developed. Once developed, the practical ideal type can be used as a standard by which something can be measured.

The Service Delivery Plan (SDP) for the CEAP Program is a process developed by TDHCA to assess plans submitted by agencies requesting CEAP funding (See Appendix B for a copy of SDP provisions for PY00). The SDP contains the standards or guidelines that agencies must follow when writing their plans. The conceptual framework for this research is based on the required elements contained in the SDP.

For the purpose of this research, the SDP is analyzed and descriptive categories and

subcategories are developed to describe the required elements of the SDP. There are nine main categories and fifty-one subcategories. The main categories that reflect the requirements of the SDP are as follows:

1. **Required Elements;**
2. **Budget Information;**
3. **Description of Organization;**
4. **Unmet Need;**
5. **Available Resources;**
6. **Program Objectives;**
7. **Direct Services Support;**
8. **Case Management; and**
9. **Project Description.**

Each of the major categories contain various subcategories that more clearly indicate the information solicited from CEAP pro posers.

All service delivery plans have a set of **Required Elements**. The Required Elements are forms or documents that must be included in the plan. Required Elements include such items as a Cover Letter, CEAP Application, Table of Contents, and Numbered Pages.

In order to insure adequate funding is available to provide services in the most cost effective manner, organizations must have a budget. Therefore, the requirements of the SDP includes **Budget Information**. Budget Information includes such items as a personnel form, procurement procedures, and description of costs pertaining to fringe benefits, travel, equipment over \$500.00, supplies and materials, and contractual services.

Organizations that provide services to low-income households must be able to clearly and concisely express how they will address the diverse needs of the poor population they serve. The

SDP requirement for CEAP contains several sections that ask proposers to provide information to address particular issues dealing with energy assistance funding. The first section is under the heading of **Description of Organization**. This section asks the proposer to provide information on their organization. For example, it asks for a description of current services provided by the organization, a description of the application intake process, the number of and demographic profile of households served, and a description of target groups currently served. In addition, to better understand the unique needs of each community, TDHCA requests that proposers provide a description of the cities/counties served, any organizational restrictions, previous CEAP funding, and how CEAP funds have improved services in the past. A description of new resources accessed during the current year is also required as part of the SDP. This information is an indicator that the organization maximizes its times and efforts by networking with other social service providers in providing services to low-income clients who have a multitude of complex needs.

**Unmet Need** is a category in the SDP where the proposer is required to describe the nature and extent of the unmet need for energy services for low-income persons in the service area. The information requested in this section is important because it permits the organization to justify the need for CEAP funding. Subcategories in the section of Unmet Need are directly linked to the formula used by TDHCA to distribute funding.

**Available Resources** is a category in the SDP where the proposer for CEAP funds is required to describe the resources available within and outside their organization that provide

assistance to low-income clients. In this section, the proposer is asked to describe the types of services they provide and the limitations of these services. Information on the number of organizations serving the target group, an inventory of existing energy services, and available energy assistance and other resources in the organization's service area is requested in the Available Resources section of the SDP.

Clearly defined program objectives allow an organization to have a clear purpose, to measure results, and to insure accountability for the funding they receive. Therefore, **Program Objectives** is another category in the SDP requirements. Each CEAP proposer is required to adopt at least one objective and describe what measures the agency will adopt and what data it will track to evaluate the achievement of the objective.

**Direct Services Support** are costs that are not administrative in nature but are used for outreach, targeting and needs assessments to service eligible households. CEAP expenditures in this category are limited to 5% of the direct services funds. Because of this limitation, proposers are required to provide information on direct services such as how potential CEAP clients will be identified, how each county of the service area will be served, how historically under-served populations will be served, and how the priority groups under CEAP will be served. In addition, proposers are asked to provide information on how the prioritization schema will be structured, how applications will be taken, the location of outreach offices in the service area, and how the proposer will work through other entities in the counties to be served.

**Case Management** is a category in the SDP requirements where the proposer is



requested to provide an operational summary description of case management and referral activities for CEAP. Expenditures in this category are limited to 6.38% of the total grant allocation. Because of the restriction on expenditures, proposers are required to explain the coordination of services to client households through cooperative agreements, to describe coordination with other energy related programs, and to detail coordination with local energy vendors. Information in the Case Management section of the SDP is important because cooperation among agencies with similar purposes allow for more effective use of CEAP funding.

**Project Description** is the last category of the SDP requirements. This section brings the entire SDP together. The organization has described itself as capable of administering services to low-income households in need of energy assistance and has justified the need for the assistance. The next task for the organization is to describe the program that the proposer intends to fund with the grant. In this section, the proposer is required to provide an operational summary description of the four CEAP program components based on minimum requirements. Each component must identify the target group to be served and be accompanied by a timeline. In the Project Description section of the SDP, the proposer is asked to identify the target group of individuals needing energy assistance that the proposer intends to assist, to provide energy budget/cost management services to co-pay households, to provide energy demand/consumption management services, and to arrange for arrearage reduction, reasonable or reduced payment schedules, or cost reductions through negotiations with energy vendors or other entities.

In addition, CEAP proposers are required to provide services to reduce energy demand, consumption, and costs through such activities as making energy-related residential repairs and/or efficiency improvements in coordination with weatherization contractors and in coordination with energy vendors, to provide energy conservation education services, and to describe how payments will be made to energy vendors.

All of the above categories comprise the requirements of the CEAP service delivery plan and are the elements that constitute the conceptual framework for this research. The complete conceptual framework is summarized in Table 4.1.

The next chapter describes the methodology used to conduct the research. Chapter five also ties the conceptual framework to the empirical portion of the research. The statistical techniques used to conduct the research are also detailed.

**Table 4.1: Summary of The Conceptual Framework**

IDEAL TYPE/CATEGORIES	SOURCE
<b>Required Elements</b>	Requirements of SDP
Cover Letter	Requirements of SDP
CEAP Application - Attachment C	Requirements of SDP
Table of Contents	Requirements of SDP
Numbered Pages	Requirements of SDP
<b>Budget Information</b>	Requirements of SDP
Personnel Form - Attachment D	Requirements of SDP
Description of Fringe Benefits	Requirements of SDP
Description of Travel	Requirements of SDP
Description of Equipment over \$500	Requirements of SDP
Description of Supplies and Materials	Requirements of SDP
Description of Contractual Services	Requirements of SDP
Procurement Procedures	Requirements of SDP
<b>Program Narrative - General Description of Organization</b>	Requirements of SDP
Type of Current Services	Requirements of SDP
Application Intake Process	Requirements of SDP
Number of Households Served	Requirements of SDP
Demographic Profile of Households Served	Requirements of SDP
Target Groups Currently Served	Requirements of SDP
Cities/Counties Served	Requirements of SDP
Organization Restriction	Requirements of SDP
Previous CEAP Funding	Requirements of SDP
How CEAP Funds Have Improved Services	Requirements of SDP
New Resources Accessed or Developed During Previous Funding Period	Requirements of SDP
Number of New Clients Served in 1998	Requirements of SDP
<b>Unmet Need</b>	Requirements of SDP
Extent of Unmet Need For Energy Services for Low-Income Persons in Service Area	Requirements of SDP
Number of Low-Income Persons in Service Area	Requirements of SDP
Energy Need of Eligible Population	Requirements of SDP
Description of Area's Weather Conditions	Requirements of SDP
Demographic Info. On Eligible Population	Requirements of SDP

IDEAL TYPE/CATEGORIES	SOURCE
<b>Available Resources</b>	Requirements of SDP
Organizations Serving Target Group	Requirements of SDP
Inventory of Existing Energy Services	Requirements of SDP
Available Energy Assistance & Other Resources	Requirements of SDP
<b>Program Objectives</b>	Requirements of SDP
Adoption of at least 1 of 4 primary objectives	Requirements of SDP
<b>Direct Services Support</b>	Requirements of SDP
Describe How Clients Will Be Identified	Requirements of SDP
Describe How Each County of Service Area Will Be Served	Requirements of SDP
Describe How Underserved Populations Will Be Served	Requirements of SDP
Describe How CEAP Priority Groups Will Be Served	Requirements of SDP
Description of Prioritization Schema	Requirements of SDP
Copy of Prioritization Form	Requirements of SDP
Describe Application Process	Requirements of SDP
Describe Location of Outreach Offices	Requirements of SDP
Describe Coordination With Other Agencies	Requirements of SDP
<b>Case Management</b>	Requirements of SDP
Describe Cooperative Arrangements	Requirements of SDP
Describe Coordination With Other Energy Related Programs	Requirements of SDP
Describe Coordination With Local Energy Vendors	Requirements of SDP
<b>Project Description of Four Program Components</b>	Requirements of SDP
Identify Target Group	Requirements of SDP
Provide Energy Budget/Cost Mgt. Services to Co-Pay Clients	Requirements of SDP
Provide Energy Demand Consumption Mgt. Services	Requirements of SDP
Arrange for Arrearage Reduction With Energy Vendors	Requirements of SDP
Provide Services To Reduce Energy Demand	Requirements of SDP
Provide Energy Conservation Education	Requirements of SDP
Describe Payments To Energy Vendors	Requirements of SDP
Time-Line for Activities By Component	Requirements of SDP

## **Chapter Five**

### **METHODOLOGY**

#### **Introduction**

Chapter five discusses the methodology used to assess the service delivery plans for the Comprehensive Energy Assistance Program submitted to the Texas Department of Housing and Community Affairs. If the organization had a current SDP for Fiscal Year 2000 on file with TDHCA, that year's plan was reviewed. If not, the service delivery plan for the previous year, Fiscal Year 2000 was assessed. The required elements for SDPs for Fiscal Year 1999 and 2000 are identical.

#### **Content Analysis**

The methodology utilized for this research is content analysis. Content analysis is described by Babbie (1995, p.307) as a mode of observation that answers "what is it?" or descriptive type of questions.

Content analysis involves creating a series of categories and subcategories and then methodically counting the number of responses that fall into each category (Zimmermann, 1995). In content analysis, the researcher is required to have a unit of analysis. The unit of analysis is the subject being studied. The unit of analysis for this research is the service delivery plan submitted for the Comprehensive Energy Assistance Program administered by the Texas Department of Housing and Community Affairs. To facilitate the assessment process of the

comparison of service delivery plans to the required elements, the conceptual framework of ideal categories (required elements) and their subcategories are operationalized into a table (Refer to Table 5.1).

### *Advantages of Content Analysis*

Every research methodology has strengths and weaknesses. Babbie (1995) describes the advantages and disadvantages of content analysis. The greatest advantage of content analysis according to Babbie (1995) is its economy in terms of both time and money. For example, there is no requirement for a large research staff, and no special equipment is needed when using content analysis. "As long as you have access to the material to be coded, you can undertake content analysis" (Babbie, 1995, p.318). For example, in this study the only materials required were the SDP's. The plans were reviewed in two days by one person using a coding sheet.

Safety is another advantage of content analysis mentioned by Babbie (1995). For instance, when using content analysis, it is usually easier to repeat a portion of the study due to error than when using other research methods such as field research.

Another strength of content analysis as a research methodology is that it allows the researcher to study processes occurring over long periods of time. Babbie (1995) also contends that content analysis has the advantage of being unobtrusive. "Because the novels have already been written, the paintings already painted, the speeches already presented, content analysis can have no effect on them" (Babbie, 1995, p.318).

### *Disadvantages of Content Analysis*

As with any research methodology, there are also disadvantages to using content analysis. One weakness of using content analysis, according to Babbie (1995) is that it is limited to the examination of recorded communications. The communication may be oral, written, or graphic. It must, however, be recorded in some manner to allow analysis. In this case, the examination was limited to SDPs on file with TDHCA the days of the review.

Another weakness of content analysis is that the coding procedure developed by the researcher may not be the most appropriate to use for the research being conducted. This presents problems of validity, because the most valid measure may have been overlooked in the coding process due to an inappropriate coding procedure. For example, another person reviewing the SDPs using the same coding sheet may not obtain the same results.

### *Unit of Analysis For Research*

For the purpose of this research, forty-four out of a total of fifty-one service delivery plans submitted by organizations within the State of Texas for the Comprehensive Energy Assistance Program were analyzed and compared with the descriptive categories to determine if they contain the required elements established by the Texas Department of Housing and Community Affairs. Twenty service delivery plans for Program Year 2000 and twenty-four plans for Program Year 1999 were analyzed. Seven agencies had no Program Year 1999 or Program Year 2000 service delivery plan on file with the Department.

According to Babbie (1995), in order to have a fairly representative sample of the "population," a minimum of 30 subjects must be used. The sampling of forty-four service delivery plans ensures adequate representation of the population. Thus, this sample is large enough to make statistical generalizations about the service delivery plans.

### *Sample For Research*

As mentioned previously, there are fifty-one CEAP grantees in the State of Texas. Each grantee is required to have an approved service delivery plan filed with TDHCA in order for a contract to be signed and funding to be released. However, the sampling frame for this research consists of only forty-four service delivery plans because seven agencies did not have a service delivery plan on file on the days this researcher reviewed the plans at the office of TDHCA.

### *Statistics For Research*

Each service delivery plan is analyzed and compared to the categories of the practical ideal type to determine if it contains the elements of the ideal type. A list provided by TDHCA naming all CEAP grantees is used to check off each plan as it is reviewed and to ensure that no organization is missed in the assessment process. A SDP will either contain **all of the element**, **some** of it, or **none** of it. Descriptive statistics such as mode, percentages or frequencies are used. Please refer to Appendix C for a complete listing of the CEAP grantees in Texas as of January, 2000.

Once all of the service delivery plans have been analyzed, the statistics should provide



results indicating whether or not the plans submitted to and approved by TDHCA contained all of the elements of the SDP. If the results indicate that a majority of the service delivery plans did not meet the criteria established by TDHCA, then recommendations to improve the review process will be offered.

## Chapter Six

### RESULTS

#### Introduction

The purpose of chapter six is to review the findings from the analysis of the service delivery plans submitted for the Comprehensive Energy Assistance Program in the State of Texas. The results are based on an assessment of forty-four service delivery plans and compared to the practical ideal type through the use of a coding sheet derived from the requirements established by TDHCA for the CEAP Program. Please refer to Appendix D for a complete summary of responses.

The results of the analysis are identified in summary tables for each descriptive category and its subcategories. The findings for each subcategory are shown as a percentage of the responses for that subcategory. The findings are based on whether or not a SDP contained either **ALL**, **SOME**, or **NONE** of the information required. **ALL** indicates that the SDP contained all of the necessary information required by a particular category; **SOME** indicates that a SDP contained only partial information required by a category; and **NONE** indicates that SDP contained no information addressing a category.

#### Required Elements

The results of the assessment indicate that a majority of the CEAP SDPs submitted to TDHCA contained all of the necessary information required by each subcategory under *Required Elements*. It is interesting to note that although one of the Required Elements was a form that

was actually provided in the application process to organizations, six agencies failed to include the form in the completed SDP submitted to TDHCA for approval. In addition, seven agencies failed to follow simple instructions such as including a cover letter with the SDP. Please refer to Table 6.1 for a summary of findings.

**Table 6.1**  
**REQUIRED ELEMENTS: Summary of Findings**

<i>Required Elements</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
<b>Cover Letter</b>	<b>84%</b>	-----	<b>16%</b>
<b>CEAP Application</b>	<b>86%</b>	-----	<b>14%</b>
<b>Table of Contents</b>	<b>86%</b>	-----	<b>14%</b>
<b>Numbered Pages</b>	<b>93%</b>	-----	<b>7%</b>

N=44

### **Budget Information**

The findings under the category of Budget Information begin to indicate a higher percentage of organizations that fail to provide required information. As can be seen below in Table 6.2, many organizations simply did not provide the information requested. It is important to note however, that the administration of the CEAP Program in many instances has to be supported by other program funds. For example, many organizations stated in their SDPs that Community Service Block Grant (CSBG) funds provide the majority of administrative support for the CEAP Program. For instance, forty organizations do not purchase equipment over \$500.00 with CEAP funding and eighteen agencies do not purchase any supplies or materials with CEAP funding.

**Table 6.2**  
**BUDGET INFORMATION: Summary of Findings**

<i>Budget Information</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
<b>Personnel Form - D</b>	73%	-----	27%
<b>Description of Fringes--</b>	77%	5%	18%
<b>Description of Travel</b>	73%	2%	25%
<b>Equipment Over 500</b>	2%	7%	91%
<b>Supplies &amp; Materials</b>	59%	-----	41%
<b>Contractual Services</b>	39%	2%	59%
<b>Procurement Proced.</b>	27%	5%	68%

N=44

**Program Narrative - Description of Organization**

Description of the Organization is part of the narrative for the SDP and is limited to a maximum of ten pages. The information in this section of the SDP provides TDHCA with an overview of the organization requesting CEAP funding. For example, the types of services currently offered by the organization, the number of households served, and the target groups identified by the organization as receiving priority for services can be found in the narrative. A review of the narratives submitted as part of the SDP indicates that many organizations that apply for CEAP funding are multipurpose, nonprofit organizations that also receive funding for a multitude of federal and state programs and who have been in business for many years.

**Table 6.3**  
**PROGRAM NARRATIVE - DESCRIPTION OF ORGANIZATION:**  
**Summary of Findings**

<i>Program Narrative</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
<b>Type of Current Service</b>	89%	9%	2%
<b>App. Intake Process</b>	70%	11%	18%
<b># of Households Served</b>	77%	9%	14%
<b>Demo. Profile of House.</b>	59%	7%	34%
<b>Target Group Served</b>	77%	11%	11%
<b>Cities/Coun. Served</b>	93%	2%	5%
<b>Organization Restriction</b>	55%	2%	42%
<b>Previous CEAP Funding</b>	73%	9%	18%
<b>CEAP Improved Services</b>	61%	14%	25%
<b>New Resources Accessed</b>	39%	16%	45%
<b>New Clients Served</b>	66%	-----	34%

N=44

### Unmet Need

The Unmet Need category of the SDP is also part of the narrative and consists of information that is pertinent to the community in which the proposer resides. This information provides TDHCA with an idea of the extent of unmet energy service needs in the community, the number of low-income persons in the service area, demographic information on the eligible population, and a description of the area's weather. This information is critical to justify that funding for energy assistance is needed in a particular service area.

A majority of the SDPs submitted and approved by TDHCA addressed the requirements

of the subcategories in this section. There are a few subcategories, however, that were not addressed fully or at all. For example, four organizations failed to completely address the extent of unmet energy service needs in the communities they propose to serve, and 20% of the organizations only partially specified the energy need of the eligible population in their individual service area. Please refer to Table 6.4 for an overall summary of responses to Unmet Need.

**Table 6.4**  
**UNMET NEED: Summary of Findings**

<i>Unmet Need</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
Extent of Energy Need	66%	25%	9%
# of Low Income in Area	95%	5%	-----
Energy Need of Pop.	66%	20%	14%
Descrip. Of Weather	82%	14%	5%
Demo. On Eligible Pop.	93%	2%	5%

N=44

### **Available Resources**

The Available Resources category is also part of the narrative of the SDP and provides TDHCA with an inventory of existing organizations that serve low-income individuals including those programs that provide energy assistance with funds other than CEAP. Again, a majority of the SDPs reviewed addressed the requirements of the subcategories included in this section. Ten organizations however, failed to provide an inventory of existing energy services, and eight organizations only partially addressed organizations serving the target group identified by their

particular agency. Please refer to Table 6.5 for an overall summary of responses to Available Resources.

**Table 6.5**  
**AVAILABLE RESOURCES: Summary of Findings**

<i>Available Resources</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
<b>Org. Serving Target</b>	<b>73%</b>	<b>18%</b>	<b>9%</b>
<b>Existing Energy Services</b>	<b>64%</b>	<b>14%</b>	<b>23%</b>
<b>Avail. Energy Assistance</b>	<b>68%</b>	<b>16%</b>	<b>16%</b>

N=44

### **Program Objectives**

The Program Objectives category of the SDP is also part of the narrative and requires organizations to implement one of four primary objectives adopted by TDHCA in the administration and design of the CEAP Program. Organizations must also describe in the SDP what measures they will adopt and what data they will track to evaluate the achievement of the objective.

The four objectives that organizations may choose from include:

1. To target energy assistance to low income households with the highest home energy needs, taking into account both energy burden and vulnerable household members;
2. To increase energy affordability while protecting health and safety for CEAP recipient households;
3. To increase efficiency of energy usage while protecting health and safety of low-income

households; and

4. To act as an advocate for low-income households with the community, social service providers and energy providers.

The results in Table 6.6 indicate that the majority of agencies adopted one of the four objectives. However, six organizations failed to follow instructions. In addition, a review of the SDPs indicate that although the majority of the organizations chose an objective, organizations failed to describe what measures they would adopt and what data they would track to evaluate the achievement of the objective. In addition, although agencies are required to only adopt one of the four objectives, 27% of the organizations adopted multiple objectives. Twenty-four organizations chose to adopt objective one; fifteen chose objective two; eight organizations chose objective three; and twelve organizations chose to implement objective four.

**Table 6.6**  
**PROGRAM OBJECTIVES: Summary of Findings**

<i>Program Objectives</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
Adopt. Of 1 of 4 Object.	86%	-----	14%

N=44

### **Direct Service Support**

The category of Direct Service Support is also part of the SDP narrative and requests information on the direct operation of the CEAP Program. For instance, information on how potential clients will be identified and how clients will be served is included in this section of the narrative. In addition, how the CEAP priority groups will be served must also be explained. The



priority groups for the CEAP Program include the elderly, disabled, and children under six. Coordination with other agencies and a description of the application process is also included under Direct Service Support.

Although the majority of agencies addressed the requirements of the subcategories included in the Direct Services Support section, there are a number of categories that were not addressed fully or at all. For example, half of the organizations failed to describe the prioritization schema used by their agency to prioritize services. The prioritization schema is a vital instrument since rarely does funding allow organizations to serve all applicants requesting assistance. Thirty-seven organizations did, however, include a copy of the prioritization form in the SDP. This practice indicates that although the majority of organizations failed to provide a description of the prioritization schema, most organizations do have such a schema since a form has been developed. See Table 6.7 for an overall summary of responses to Direct Services Support.

**Table 6.7**

**DIRECT SERVICES SUPPORT: Summary of Findings**

<i>Direct Services Supp.</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
<b>Client Identification</b>	<b>91%</b>	<b>7%</b>	<b>2%</b>
<b>How Counties Served</b>	<b>75%</b>	<b>16%</b>	<b>9%</b>
<b>How Underserved. Pop.</b>	<b>70%</b>	<b>25%</b>	<b>5%</b>
<b>How CEAP Group Serv.</b>	<b>68%</b>	<b>23%</b>	<b>9%</b>
<b>Describe Prioritization</b>	<b>25%</b>	<b>25%</b>	<b>50%</b>
<b>Copy of Form</b>	<b>84%</b>	-----	<b>16%</b>
<b>Application Process</b>	<b>34%</b>	<b>20%</b>	<b>45%</b>
<b>Outreach Offices</b>	<b>64%</b>	<b>9%</b>	<b>27%</b>
<b>Coord. With Agencies</b>	<b>43%</b>	<b>39%</b>	<b>18%</b>

## Case Management

The category of Case Management is the second to the last part of the narrative for the SDP and requests information on how case management services will be delivered as part of the CEAP Program. Unfortunately, a large number of organizations failed to provide the information required in the subcategories under Case Management. For example, sixteen agencies did not include information pertaining to coordination with energy related programs, and twelve agencies failed to describe coordination with local energy vendors. See Table 6.8 for a summary of responses to Case Management.

**Table 6.8**  
**CASE MANAGEMENT: Summary of Findings**

<i>Case Management</i>	<i>ALL</i>	<i>SOME</i>	<i>NONE</i>
Cooperative Agreements	20%	45%	34%
Coord. With Energy Prog.	27%	36%	36%
Coord. With Local Ven.	36%	36%	27%

N=44

## Project Description of Four Program Components

The Project Description of the Four Program Components is the final part of the narrative. This section presents the details of how the agency proposes to design and implement the CEAP program. A review of the SDPs for forty-four CEAP grantees in Texas reveals a wide variety of programs designs. The results in Table 6.9 indicate a higher percentage of ALL

responses. The subcategory of “Time-Line For Activities By Component” however, revealed a high number of NONE responses (75%).

**Table 6.9**  
**PROJECT DESCRIPTION OF FOUR PROGRAM COMPONENTS:**  
**Summary of Findings**

<i><b>Project Description</b></i>	<i><b>ALL</b></i>	<i><b>SOME</b></i>	<i><b>NONE</b></i>
<b>Identify Target Group</b>	<b>100%</b>	-----	-----
<b>Provide Energy Budget</b>	<b>100%</b>	-----	-----
<b>Provide Mgt. Services</b>	<b>98%</b>	<b>2%</b>	-----
<b>Arrange Arrearage</b>	<b>50%</b>	<b>27%</b>	<b>23%</b>
<b>Provide Energy Conser.</b>	<b>98%</b>	<b>2%</b>	-----
<b>Describe Pay. To Vendors--</b>	<b>41%</b>	<b>14%</b>	<b>45%</b>
<b>Time-Line For Activities</b>	<b>18%</b>	<b>7%</b>	<b>75%</b>

N=44

As can be seen by the results of the analysis, there are some subcategories that consistently reflected higher numbers of SOME or NONE categories.

The following chapter provides a summary of the results, conclusions from the findings, and recommendations for overall improvement of the SDP review process.

## **Chapter Seven**

### **CONCLUSION**

Chapter seven summarizes the findings of the research and presents recommendations that address the findings. The purpose of this research was three fold. The first purpose was to examine the problem of poverty. The second purpose was to describe the requirements of a service delivery plan (SDP) for the Comprehensive Energy Assistance Program (CEAP). The third purpose was to assess CEAP service delivery plans using the requirements developed by the Texas Department of Housing and Community Affairs (TDHCA) as a standard of comparison.

The questions of how closely the SDPs reflect the reality of each particular agency or how well each organization is at implementing the plans and meeting the energy needs of the poor is outside the scope of this project. The project is limited solely to assessing a document, the SDP, that connects two agencies in the process of delivering services to the poor. The larger and more interesting question is beyond the scope of this applied research project. On the other hand, communication and documentation between funding organizations is important. Documents such as the SDP are clearly within the scope of public administration.

#### **Summary of Findings**

The research was intended to understand or gauge how close the CEAP service delivery plans were to meeting the requirements established by TDHCA when compared to the practical

ideal type. The results of the research indicate that no agency completely addressed all the requirements of a SDP. There were however, some categories that were more fully addressed than others. Those include the categories of *required elements, description of organization, unmet need, program objectives, direct services support, and a project description of the four program components.*

The most poorly addressed categories of the SDP appear to be the categories of *case management and budget information.* It appears that much of the budget information is lacking from the SDPs because most organizations rely on funding outside of CEAP to support the program. Therefore, many of the subcategories under *budget information* are not applicable since those costs are supported by other funding sources.

The category of *Case Management* is an important one in regard to the purpose of the CEAP program. An organization cannot provide a suitable plan to address the needs of the poor and to transition them out of poverty without case management. Therefore, considering the importance of case management in this process, it is surprising that the results indicate so many SDPs responding as either SOME or NONE under the *Case Management* category.

## **Recommendations**

Improvements can be made to increase the quality of CEAP SDPs submitted to TDHCA. In addition, a better system for reviewing these plans can be implemented by TDHCA. Recommendations to facilitate these improvements include the following:

1. TDHCA should offer an annual CEAP technical assistance workshop before SDPs are due. The Department already offers such workshops for other programs it administers such as the Emergency Shelter Grants Program. At the technical assistance workshops, applicant organizations are provided with instructions for applying for the grant and are walked through each section of the instructions. Applicant's questions are then answered in regards to the material presented in the instructions. The kind of assistance necessary to improve the overall quality and responsiveness of the SDPs can be provided at these technical assistance workshops.
2. Since developing a SDP is very similar to writing a grant, TDHCA should sponsor grant-writing workshops. Providing grant-writing training strengthens and sharpens an organization's writing abilities which then results in more coherent and better thought out plans.
3. Considering the high percentage of organizations not meeting the requirements of case management, TDHCA should hold frequent workshops on how to plan and implement an effective case management system at the local level.
4. TDHCA should develop a form for all persons who review SDPs to use. The use of such a form will insure that the review process is more consistent than it currently is. In addition, a form containing all the required elements will insure that incomplete SDPs are not approved by the Department. The use of this form should be carefully reviewed with TDHCA employees at a technical assistance workshop.
5. TDHCA should carefully review the requirements of the SDP. It may be that some categories are not applicable to many funding organizations and can thus be eliminated.

As stated at the beginning of chapter seven, the analysis was limited solely to assessing the requirements of the SDP. How well each agency was at meeting the energy needs of the poor and how well the plans were implemented was beyond the scope of this applied research project. Future research could look more closely at the overall compliance rate of organizations.

## **Conclusion**

The research provided a picture of how closely CEAP service delivery plans submitted to TDHCA were to the practical ideal type. What was revealed is that none of the 44 plans reviewed for this research contained all the required elements. For the most part, however, the service delivery plans met most of the requirements promulgated by TDHCA with the exception of case management. Ironically, case management is the most vital part of the CEAP program. Agencies are unable to effectively and efficiently meet the needs of the poor and transition them out of poverty without a strong and well thought out case management system in place. Case management workshops sponsored by TDHCA stressing how to plan and implement an effective case management system at the local level is recommended. In addition, a recommendation for grant-writing training may result in more coherent and better thought out plans. TDHCA should also develop a form for all persons who review SDPs to use. The use of such a form will only insure that the review process is more consistent than it currently is. This practice will reduce the risk of TDHCA approving SDPs and releasing funding to organizations that fail to meet requirements. Finally, TDHCA should carefully review the requirements of the SDP. It may be



that some categories are not applicable to many funding organizations and can thus be eliminated from the requirements.

The research conducted in this paper should be considered by the reader to be preliminary in nature. The practical ideal type is concerned with describing “what is it?” or “what does it look like?” This applied research project attempted to answer that question in regards to service delivery plans submitted to TDHCA for the CEAP program. Recommendations for future research could look more closely at the overall compliance rate of organizations administering the CEAP program. For example, are organizations actually implementing the ideas and concepts expressed in the SDPs thus making the plans a working document? Or are organizations simply writing SDPs to meet a requirement for funding?

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**APPENDIX A**

**State of Texas Low Income Home Energy Assistance  
Program Application/State Plan for  
Federal Fiscal Year 2000**

**STATE OF TEXAS**  
**TEXAS DEPARTMENT OF HOUSING AND COMMUNITY AFFAIRS**  
**FEDERAL FISCAL YEAR 2000**

**LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)**  
**DETAILED STATE PLAN AND APPLICATION**  
**SUBMITTED TO THE**  
**U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**October, 1999**

**George W. Bush, Governor**  
**State of Texas**

**Daisy A. Stiner, Executive Director**  
**Texas Department of Housing and**  
**Community Affairs**

**OMB Approval No: 0970-0075**

**Expiration Date: 12/31/2001**

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**State of Texas  
FFY 00 Low Income Home Energy Assistance Program**

**Application/State Plan**

**I. INTRODUCTION**

In accordance with the "Low Income Home Energy Assistance Act of 1981" and subsequent amendments, the Governor of Texas, George W. Bush, hereby submits to the Department of Health and Human Services this Application/State Plan for the Federal Low Income Home Energy Assistance Program for the Federal Fiscal Year 2000. The Texas Legislature has designated Texas Department of Housing and Community Affairs, Daisy A. Stiner, Executive Director as the single state agency to administer this program. The address of the state administering agency is:

Texas Department of Housing and Community Affairs  
P.O. Box 13941  
Austin, Texas 78711-3941  
(512) 475-3800  
EIN: 1-74-169-1572-A1

Copies of the correspondence should also be sent to:

Texas Department of Housing and Community Affairs  
Administration and Community Affairs Division  
Attention: Peggy M. Colvin, Manager, Energy Assistance Section  
P.O. Box 13941  
Austin, Texas 78711-3941  
(512) 475-3864  
E-mail: [pcolvin@tdhca.state.tx.us](mailto:pcolvin@tdhca.state.tx.us)  
Fax: (512) 475-3935  
State

On behalf of the Governor of Texas, George W. Bush, TDHCA certifies that the State of Texas agrees to the provisions and assurances set forth in Section 2605 (a), 2605 (b), 2605 (c) of the "Low Income Home Energy Assistance Act of 1981" and subsequent Amendments. These assurances, together with a description of how Texas intends to carry out specific assurances, and all other applicable provisions and requirements are set forth in the following document.

## **PROGRAM SUMMARY FOR FEDERAL FISCAL YEAR 2000**

In FFY 93, the Texas Department of Housing and Community Affairs (TDHCA) decentralized all aspects of the LIHEAP program by utilizing a network of subgrantees made up of public and non-profit entities serving 254 counties in the State. During the course of the funding year, seven subgrantees were participants in a pilot project creating an innovative program to address all facets of low-income Texans' energy needs. A basic philosophy emerged which centered around building energy self-sufficiency for clients. Service delivery not only entailed utility payment on behalf of the client, but also a system that addressed the underlying contributing causes of energy induced hardships.

In FFY 94, TDHCA introduced the Comprehensive Energy Assistance Program (CEAP) that replaced the pilot project and Utility Assistance Program (UAP) of FFY 93. The goal of this program was fourfold: 1) to assist a household in developing goals for self-sufficiency through case management and a co-payment utility plan; 2) to provide relief to those low-income elderly and persons with disabilities most vulnerable to the high cost of energy for home heating and cooling; 3) to provide one-time assistance in an energy related crisis; and 4) to address inefficient home heating and cooling appliances through a retrofit, repair and replacement program.

For FFY 00, TDHCA will operate a similar program as has developed over the last seven program years. The driving philosophy will continue to encourage energy self-sufficiency by addressing the underlying contributing causes of energy induced hardships. The program will continue to offer the before described components. TDHCA proposes to continue operating the LIHEAP Weatherization Assistance Program in a manner similar to FFY 99 operations under the DOE/LIWAP statute and LIWAP regulations. TDHCA proposes to allow the use of no more than 5% of the total LIHEAP 15% weatherization funds for weatherization repairs, specifically for roof repair/replacement (under LIHEAP statute and regulations) that will enable the dwelling units to be weatherized (under DOE statute and regulations), in accordance with LIHEAP Information Memorandum Transmittal No. LIHEAP-IM-99-11, dated 6/15/99.

## II. STATEMENT OF STATUTORY ASSURANCES

The State of Texas agrees to:

(1) Use the funds available under this title to --

(A) Conduct outreach activities and provide assistance to low income households in meeting their home energy costs, particularly those with the lowest incomes that pay a high proportion of household income for home energy, consistent with paragraph (5):

(B) intervene in energy crisis situations;

(C) provide low-cost residential weatherization and other cost-effective energy-related home repair; and

(D) plan, develop, and administer the State's program under this title including leveraging programs,

and the State agrees not to use such funds for any purposes other than those specified in this title;

(2) make payments under this title only with respect to--

(A) households in which one or more individuals are receiving--

(i) aid to families with dependent children under the state's plan approved under part A of title IV of the Social Security Act (other than such aid in the form of foster care in accordance with section 408 of such Act);

(ii) supplemental security income payments under title XVI of the Social Security Act;

(iii) food stamps under the Food Stamp Act of 1977; or

(iv) payments under section 415, 521, 541, or 542 of title 38, United States Code, or under section 306 of the Veteran's and Survivors' Pension Improvement Act of 1978; or

(B) households with incomes which do not exceed the greater of--

(i) an amount equal to 150 percent of the poverty level for such State; or

(ii) an amount equal to 60 percent of the State median income;

except that a State may not exclude a household from eligibility in a fiscal year solely on the basis of household income if such income is less than 110 percent of the poverty level for such State, but the State may give priority to those households with the highest home energy costs or needs in relation to household income.

- (3) conduct outreach activities designed to assure that eligible households, especially households with elderly individuals or persons with disabilities, or both, and households with high home energy burdens, are made aware of the assistance available under this title, and any similar energy-related assistance available under subtitle B of title VI (relating to community services block grant program) or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;
- (4) coordinate its activities under this title with similar and related programs administered by the Federal Government and such State, particularly low-income energy-related programs under subtitle B of title VI (relating to community services block grant program), under the supplemental security income program, under part A of title IV of the Social Security Act, under low-income Weatherization Assistance Program under title IV of the Energy Conservation and Production Act, or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;
- (5) provide, in a timely manner, that the highest level of assistance will be furnished to those households which have the lowest incomes and the highest energy costs or needs in relation to income, taking into account family size, except that the State may not differentiate in implementing this section between the households described in clauses 2(A) and 2(B) of this subsection;
- (6) to the extent it is necessary to designate local administrative agencies in order to carry out the purposes of this title, to give special consideration, in the designation of such agencies, to any local public or private nonprofit agency which was receiving Federal funds under any low-income energy assistance program or weatherization program under the Economic Opportunity Act of 1964 or any other provision of law on the day before the date of the enactment of this Act, except that—

- (A) the State shall, before giving such special consideration, determine that the agency involved meets program and fiscal requirements established by the State; and
  - (B) if there is no such agency because of any change in the assistance furnished to programs for economically disadvantaged persons, then the State shall give special consideration in the designation of local administrative agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds for the fiscal year preceding the fiscal year for which the determination is made;
- (7) if the State chooses to pay home energy suppliers directly, establish procedures to--
- (A) notify each participating household of the amount of assistance paid on its behalf;
  - (B) assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment made by the State under this title;
  - (C) assure that the home energy supplier will provide assurances that any agreement entered into with a home energy supplier under this paragraph will contain provisions to assure that no household receiving assistance under this title will be treated adversely because of such assistance under applicable provisions of State law or public regulatory requirements; and
  - (D) ensure that the provision of vendored payments remains at the option of the State in consultation with local grantees and may be contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households, including providing for agreements between suppliers and individuals eligible for benefits under this Act that seek to reduce home energy costs, minimize the risks of home energy crisis, and encourage regular payments by individuals receiving financial assistance for home energy costs;
- (8) provide assurances that--
- (A) the State will not exclude households described in clause (2)(B) of this subsection from receiving home energy assistance benefits under clause (2), and
  - (B) the State will treat owners and renters equitably under the program assisted under this title;
- (9) provide that--

(A) the State may use for planning and administering the use of funds under this title an amount not to exceed 10 percent of the funds payable to such State under this title for a fiscal year and not transferred pursuant to section 2604 (f) for use under another block grant; and

(B) the State will pay from non-Federal sources the remaining costs of planning and administering the program assisted under this title and will not use Federal funds for such remaining cost (except for the costs of the activities described in paragraph (16));

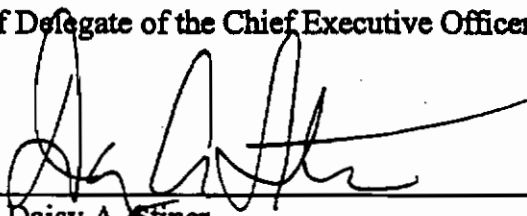
- (10) provide that such fiscal control and fund accounting procedures will be established as may be necessary to assure the proper disbursement of and accounting for Federal funds paid to the State under this title, including procedures for monitoring the assistance provided under this title, and provide that the State will comply with the provisions of chapter 75 of title 31, United States Code (commonly known as the "Single Audit Act");
- (11) permit and cooperate with Federal investigations undertaken in accordance with section 2608;
- (12) provide for timely and meaningful public participation in the development of the plan described in subsection (c);
- (13) provide an opportunity for a fair administrative hearing to individuals whose claims for assistance under the plan described in subsection (c) are denied or are not acted upon with reasonable promptness; and
- (14) cooperate with the Secretary with respect to data collecting and reporting under section 2610.
- (15) beginning in fiscal year 1992, provide, in addition to such services as may be offered by State Departments of Public Welfare at the local level, outreach and intake functions for crisis situations and heating and cooling assistance that is administered by additional State and local governmental entities or community-based organizations (such as community action agencies, agencies on aging and not-for-profit neighborhood-based organizations), and in States where such organizations do not administer functions as of September 30, 1991, preference in awarding grants or contracts for intake services shall be provided to those agencies that administer the low-income weatherization or energy crisis intervention programs.

- (16) use up to 5 percent of such funds at its option, to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance, including needs assessments, counseling, and assistance with energy vendors, and report to the Secretary concerning the impact of such activities on the number of households served, the level of direct benefits provided to those households, and the number of households that remain unserved.

**Certification to the Assurances**

**As the Delegate of the Chief Executive Officer, I agree to comply with the sixteen assurances contained in the Title XXVI of the Omnibus Budget Reconciliation Act of 1981, as amended. By signing these assurances, I also agree to abide by the standard assurances on lobbying, debarment and suspension, and a drug-free workplace.**

Signature of Delegate of the Chief Executive Officer

Signature:   
Daisy A. Stiner

Title: Executive Director  
Texas Department of Housing and Community Affairs

Date: 12/8/99

Employer Identification Number: 1-74-600-0156-A1

### III. THE PLAN

Statutory  
references

2602(a)  
2605(a)  
2605(b)(1)  
2605(c)(1)  
(C) & (F)

#### Purpose of Funds

69 % Direct services\*:

- heating assistance
- cooling assistance
- crisis assistance
- direct services support

\*The crisis, heating and cooling assistance components will all be integrated under one contract to the local administrative agencies to provide better coordination of services.

15 % Weatherization Assistance Program

5 % Assurance #16 (Case management)

10 % Administrative costs – State and local

1 % Leveraging activities (limited to the greater of 0.08% or \$35,000 – the Direct services category will be used to balance funding).

100 % Total

The projected dates for accepting applications and closing the program will be from January 1, 2000 to December 31, 2000.

The crisis assistance component will remain a year-round program. The Weatherization Assistance Program component will follow the DOE program year. TDHCA proposes to continue operating the LIHEAP Weatherization Assistance Program in a manner similar to FFY 99 operations under the DOE/LIWAP statute and LIWAP regulations. TDHCA proposes to allow the use of no more than 5% of the total LIHEAP 15% weatherization funds for weatherization repairs, specifically for roof repair/replacement (under LIHEAP statute and regulations) that will enable the dwelling units to be weatherized (under DOE statute and regulations), in accordance with LIHEAP Information Memorandum Transmittal No. LIHEAP-IM-99-11, dated 6/15/99. Due to the very diverse weather conditions in Texas, each local administrative agency will determine the key months for heating



and/or cooling assistance to the household based on the household's energy consumption.

A portion of the crisis assistance funds will be reserved by the State for later distribution to ensure adequate crisis assistance after March 15. Crisis funds not used during the winter months for energy crisis will be made available to local agencies to start operation for the cooling component.

2605(b)(9)

**Administrative Costs**

The State agrees to use for administrative costs purposes no more than ten percent of the funds provided under this title (for the fiscal year) and not transferred for use to another block grant.

2605(b)(6)  
2605(b)(15)

**Local Program Operators (Subgrantees)**

TDHCA will give special consideration in designating local administering agencies to any local public or private nonprofit agency: (1) which was receiving federal funds under the Low-Income Energy Assistance Program (LIHEAP) or Weatherization Assistance Program under the Economic Opportunity Act of 1964 or any other provision of law in effect the day before PL 97-35 was enacted on August 13, 1981, (2) with experience and capacity in operating energy assistance programs or experience in assisting low-income individuals in the area to be served, and (3) with the capacity to undertake timely and effective Energy Assistance Programs. However, prior to giving such special consideration, TDHCA must determine that such an agency meets program and fiscal management requirements established by TDHCA. These program requirements include outreach capability. If such an agency does not exist in an area, then TDHCA will select an agency on a competitive basis or on a sole source basis, depending upon the needs of the client group to be served and upon the scope and nature of the project to be funded.

If there is no such agency because of any change in the assistance furnished to programs for low-income individuals, then TDHCA will give special consideration in the designation of local administrative agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which

did receive funds for the fiscal year preceding the fiscal year for which the determination is made.

The Weatherization Assistance Program is provided by local governmental or nonprofit agencies of which the majority are Community Action Agencies. TDHCA contracts with these agencies to provide Weatherization Assistance Program to all 254 counties. For further information, see attached 1999 DOE State of Texas Weatherization Assistance Program State Plan.

2602(a)  
2604(c)  
2605(b)(2)  
2605(c)(1)(A)

**Eligibility**

Income eligibility for all utility assistance components under this plan will be limited to households whose income does not exceed 125% of the federal poverty income guidelines as published in the Federal Register by the U.S. Department of Health and Human Services.

Priority shall be given to eligible households --

- containing one or more persons age 60 or above and/or an individual with disability. Priority will also be given to those households with young children under the age of six. Priority is demonstrated via special documented outreach efforts to these populations. TDHCA will monitor subgrantees on these efforts.
- with the lowest incomes that pay the highest proportion of their incomes for home energy.

The term "disabled" may include individuals who are unable to engage in substantial employment by reasons of a medically determinable physical or mental condition which can be expected to last for a continuous period of not less than twelve months.

**There will be no assets tests for crisis, heating/cooling or weatherization components under this plan.**

**Crisis:**

The term energy crisis means weather-related and supply shortage emergencies, and household energy-related emergencies. In order for a household to receive energy crisis assistance, the household must have a bona fide energy crisis emergency. A bona fide energy crisis exists when extraordinary events or situations resulting from extreme weather conditions and fuel supply shortages have depleted or will deplete household financial resources and create an energy burden so as to constitute a threat to the health and well-being of the household, particularly households with elderly, persons with disabilities, or very young children. The assistance must result in the resolution of the crisis. A utility termination notice alone does not constitute an energy crisis. The provisions set under this plan for non-renters also apply to those renters who have a separate meter or who pay their utility and/or fuel bills separately from rent. For those renters who pay energy bills as part of their rent, the subgrantee will make special efforts to determine the portion of the rent that constitutes the utility payment.

**Heating/Cooling:**

Factors other than income eligibility for heating/cooling assistance will depend on the existence of an energy burden and needs of the household.

**Weatherization:**

SEE ATTACHED DOE STATE PLAN

- 2602(a)
- 2605(b)(1)
- 2605(b)(3)
- 2605(b)(4)
- 2605(b)(5)
- 2605(c)(1)
- (B) & (D)
- 2605(b)(2)(B)

**Benefit Levels**

This is not an entitlement program; payments are based on need and are subject to the availability of federal funds. Payments may be suspended, reduced or terminated if federal funds are insufficient to maintain payment through the scheduled termination date of the program.

**Crisis:**

To assure that households with the lowest incomes and greatest needs receive the greatest amount of assistance to alleviate their weather related energy crisis costs and/or needs (taking into account family size), energy crisis assistance payments will be based on the following plan:

**HOUSEHOLDS WITH  
INCOMES OF:**

**IF THE HOUSEHOLD MEETS THE  
ELIGIBILITY CRITERIA, THEN  
PAYMENT IS BASED ON THE  
FOLLOWING:**

---

0 to 50% of Poverty

---

Household would receive an amount needed to solve the crisis not to exceed \$1,000.

>50% to 75% of Poverty

Household would receive an amount needed to solve the crisis not to exceed \$900.

>75%+ to amount not to exceed 125% of Poverty

Household would receive an amount needed to solve the crisis not to exceed \$800.

For households who have already lost service or are in immediate danger of loss of service, the 48-hour time limit (18 hours in life-threatening situations) will commence upon completion of the application process.

**Heating/Cooling Assistance Payments:**

Heating and cooling assistance payments will be paid based on a sliding scale benefit structure. The highest amount of assistance will be provided to those households with the highest annual energy cost burden, greatest energy needs and the lowest income. Benefit payments are based on the household's poverty level and past heating/cooling expenses.

Heating/cooling expenses for the residents of subsidized housing who pay their heating/cooling costs directly to a vendor will be

based on heating/cooling costs minus the heating/cooling allowance.

Household energy needs takes into account the unique situation of such household that results from having members of vulnerable populations, including very young children, individuals with disabilities, and frail, older individuals.

The household's energy needs is defined as the energy used to heat and/or cool the dwelling unit, as well as the heating of water and refrigeration of food.

Based on the initial feedback from the pilot project participants, who designed and implemented the co-payment pilot programs in FFY 93, TDHCA recognizes that the elderly and persons with disabilities have special needs. Therefore, payments to the elderly and persons with disabilities will be during the highest consumption months during which time the elderly and persons with disabilities are most vulnerable to energy related stress. The subgrantee will also assist the households in accessing available community resources such as medical and nutritional programs.

To assure that households with the lowest income and greatest needs receive the greatest amount of heating and cooling assistance, payments are based on: (1) a sliding scale benefit structure under the co-payment component; or (2) the four highest consumption months under the elderly and disabled component. Payment under either component will not to exceed the following plan amounts:

<b>HOUSEHOLDS WITH INCOMES OF:</b>	<b>IF THE HOUSEHOLD MEETS THE ELIGIBILITY CRITERIA, THEN PAYMENT IS BASED ON THE FOLLOWING:</b>
0 to 50% of Poverty	Household would receive an amount not to exceed \$1,000.
>50% to 75% of Poverty	Household would receive an amount not to exceed \$900.
>75+ to amount not to exceed 125% of Poverty	Household would receive an amount not to exceed \$800.

### **Heating/Cooling Systems Component:**

Heating/Cooling Systems -- benefit to be provided under heating/cooling component. The maximum allowable costs are \$1,000 per household.

The replacement, repair and/or retrofit of the heating and cooling appliances must be based on need, i.e., an energy assessment of the home has determined that the retrofit, repair and/or replacement of the heating/cooling appliance will be cost effective and will result in a reduction of energy consumption. The energy assessment will be conducted by qualified professionals from either within the subgrantee agency or outside the subgrantee agency. In contracting out for service, the subgrantee will follow the TDHCA Policy Issuance 88-10.1 for procuring goods and services. The services may include the cleaning, tuning and evaluating of appliances, the repair and upgrade of existing components, and the replacement of unsafe, inefficient or inoperable systems.

2605(b)(16)  
2605(b)(9)(B)

### **Reduction of Home Energy Needs Activities**

TDHCA's 50 subgrantees will operate a comprehensive program that incorporates all LIHEAP benefits, household co-payments, energy conservation education, participation by utilities, and coordination with other services (such as job training/readiness, nutritional and budget counseling) in order to assist the low-income households to better manage their energy and other household needs. The benefits under the co-payment system will vary between households, based on income level and energy consumption. Payments on behalf of the participating household will be made monthly direct to the vendor. The household's co-payment will also be required monthly. The household's participation in the program will be for a minimum period of six months and maximum of twelve months.

2605(c)(1)(D)

### **Weatherization**

TDHCA proposes to continue operating the LIHEAP Weatherization Assistance Program in a manner similar to FFY 99

operations under the DOE/LIWAP statute and LIWAP regulations. DOE guidelines will be used in determining the benefit levels and types of weatherization activities. TDHCA proposes to allow the use of no more than 5% of the total LIHEAP 15% weatherization funds for weatherization repairs, specifically for roof repair/replacement (under LIHEAP statute and regulations) that will enable the dwelling units to be weatherized (under DOE statute and regulations), in accordance with LIHEAP Information Memorandum Transmittal No. LIHEAP-IM-99-11, dated 6/15/99. For additional information, please review the attached DOE State Plan.

2605(b)(5)  
& (8)(A)

#### **Benefit Levels - Categorical/Non Categorical**

All households at or below 125% of the Federal Poverty Level will be afforded access to the program. There are no categorical eligibility options. All applicant households will be determined eligible according to the income guidelines and program procedures. Benefit determinations are based on the household's income, the household size, the energy cost and/or the need of the household and the availability of funds.

For additional information regarding the Weatherization Assistance Program, please see attached DOE State Plan.

2605(b)(7)  
(A) - (D)  
2605(c)(1)(F)  
2607(b)(7)(D)

#### **Payment Methods**

A vendor agreement, required by TDHCA and implemented via the subgrantee, contains assurances as to fair billing practices, delivery procedures, and pricing procedures for business transactions involving LIHEAP recipients. These agreements are subject to monitoring procedures performed by TDHCA staff.

The subgrantees will notify each participating household of the amount of assistance paid on its behalf. Subgrantee shall document this notification. Subgrantee shall maintain proof of payment. The vendor payment method will be used by subgrantees for crisis, heating/cooling and weatherization components. Under no circumstances and without exceptions will subgrantee make cash payments directly to eligible household for crisis, heating and cooling, and the Weatherization Assistance Program.

For additional information regarding the Weatherization Assistance Program, please see attached DOE State Plan.

2605(b)(8)(B)

**Owners/Renters**

Homeowners and renters will be treated equitably under crisis assistance, heating/cooling and Weatherization Assistance Program. If the household's utility cost is included in the rent, their benefit will be calculated using an estimate.

For additional information regarding the Weatherization Assistance Program, please see attached DOE State Plan.

2605(b)(13)

**Administrative Hearings/Appeal Rights**

TDHCA will ensure that subgrantees provide an opportunity for a fair administrative hearing to individuals whose application for assistance is denied or not acted upon in a timely manner by:

- informing individuals of their right to a hearing if they are denied assistance or their request was not acted upon in a timely manner by printing such information on the application forms and Information Sheets;
- requiring each subgrantee to develop procedures for review of denials of services. Such procedures will be made available in English and/or Spanish (or Vietnamese) if determined necessary by TDHCA or the local subgrantee; and
- providing for appropriate TDHCA review of adverse determinations by subgrantees.

2604(c)(3)(A),  
8(A) & (15)  
2605(b)(1)  
2605(b)(3) & (4)  
2605(b)(2)(B)

**Outreach**

TDHCA will continue to develop interagency collaboration with other low-income program offices and energy providers to perform outreach to targeted groups. The subgrantees are held responsible for outreach activities. The LIHEAP supported services are



administered through a network of 50 subgrantees providing services to all 254 counties in the State. The subgrantees and their field offices accept applications at sites that are geographically accessible to all households requesting assistance. Because LIHEAP subgrantees are community-based organizations, intake services through home visits to persons with disabilities and/or the elderly are available.

Other outreach activities may include:

- providing information through home visits, site visits, group meetings or by telephone for physically infirm low-income persons;
- distributing posters/flyers and other informational materials at local and county social service agencies, offices of aging, social security offices, etc.;
- providing information on the program and eligibility criteria in articles in local newspapers or broadcast media announcements;
- coordinating with other low-income services to provide LIHEAP information in conjunction with other programs;
- providing information on one-to-one basis for applicants in need of translation or interpretation assistance;
- providing LIHEAP applications, forms, and energy education materials in English and/or Spanish (or Vietnamese), when appropriate;
- working with energy vendors in identifying potential applicants;
- assisting applicants to gather needed documentation; and,
- mailing information and applications.

2605(b)(4)

**Coordination of Activities**

TDHCA administers both the LIHEAP and DOE Weatherization Assistance Program, as well as other related housing and community programs. TDHCA receives funding and administers a variety of programs under the Community Services Block Grant, via a network of community action agencies, local government entities and other non-profit agencies. These agencies, with a few exceptions, also administer the LIHEAP program. TDHCA works with the Texas Association of Community Action Agencies, the Public Utility Commission, the Texas Railroad Commission, utility companies and other State entities serving the low-income population to share information, enhance and develop service capacities, and integrate resources.

2605(b)(12)

**Public Participation**

TDHCA met with various groups, including utility companies, low-income and consumer advocacy organizations, and community action agency representatives during 1999 to discuss current and future aspects of the LIHEAP program. As a part of the public hearings process, TDHCA prepared an Intended Use of Funds Report on the FFY 00 LIHEAP supported programs. Over 450 copies of the Intended Use of Funds Report were mailed out to all TDHCA Energy Assistance subgrantees, utility companies, the Texas Legislature and Congressional Delegation, and other interested parties. Written and oral comments were accepted within the public participation process which was announced statewide in libraries and other local entities via the Texas Register. A copy of the Intended Use of Funds Report and information on the public participation process was posted on the TDHCA web site. Comments that included workable suggestions that did not alter the intent of LIHEAP were incorporated into the final plan.

2605(a)(2)

**Public Hearings**

TDHCA conducted a public hearing on August 20, 1999 in Austin, Texas to solicit comments on the proposed distribution of LIHEAP funds for FFY 00.

For additional information on Weatherization Assistance Program, please see attached DOE plan.

2605(b)(10)  
2605(c)(1)(A)

**Fiscal Control & Audit**

As the state administering agency for the Texas LIHEAP, TDHCA shall:

- establish specific factors to be used in allocating the energy assistance funds that it administers to subgrantees;
- provide management and technical assistance to the local subgrantees;
- assure that outreach activities are provided to eligible households who do not have information about LIHEAP or other supportive programs;
- assure that all applicants for this program are advised of other available energy program assistance;
- place priority on providing outreach to the elderly and persons with disabilities;
- provide guidelines for serving renters as required by federal law;
- establish guidelines consistent for all service areas;
- monitor the designated local subgrantees; and,
- require all local subgrantees to comply with programmatic performance, audit and reporting requirements.

To ensure fiscal compliance for this program, TDHCA will use the following fiscal controls:

- annual audits;
- fiscal monitoring;
- payment on submission of "Request for Advance and Reimbursement Forms"; and
- Monthly Expenditure/Performance Reports.

Monitoring of the LIHEAP programs will be accomplished through monthly performance reports and periodic on-site monitoring by TDHCA staff using a standard monitoring instrument for each program, designed to identify the agency's strengths and weaknesses.

The Texas State Auditor's Office annually audits the State's records for the LIHEAP Programs.

**The Agency will cooperate in all audits and maintain records in acceptable format for audit purposes.**

**The grantee will cooperate with any reasonable federal investigation requests.**

For additional information on Weatherization Assistance Program, please see attached DOE state plan.

2607(A)  
45 CFR Part 96

**Leveraging Activities**

§96.87(d)(2)(i)

In order for subgrantees to serve eligible households in a comprehensive manner, creation of partnerships with private industries and utility vendors is essential. LIHEAP staff, both at the Grantee and the Subgrantee level, have devoted substantial time and resources in the negotiation and design of these partnerships.

§96.87(d)(1)

The resources leveraged by these activities are from non-Federal sources such as utility companies and petroleum violation escrow funds. They are provided to the LIHEAP grantee or only accessible to LIHEAP clients. They represent a net addition to the total home energy resources available to low-income households, are measurable and quantifiable and meet the requirements for countable resources.

The following resources have been leveraged on behalf of LIHEAP clients:

§96.87(d)(2)(iii)(D)

§96.87(d)(2)(iii)(E)

Subgrantees have written agreements in place with investor-owned utility companies. These agreements provide for arrearage

§96.87(d)(2)(iii)(F) forgiveness, waivers on reconnection fees, and waivers on  
§96.87(e)(1)(i) deposits. The resources generated by these agreements are only  
available to LIHEAP recipients.

TDHCA currently has written agreements with private, investor  
owned electric utility companies (IOUs). The IOUs provide  
funding for the following resources or services:

§96.87(d)(2)(ii) • The Weatherization Piggy Back Program provides for  
§96.87(e)(1)(iii) additional funding for the LIHEAP funded Weatherization  
§96.87(e)(1)(vi) Assistance Program. Utility funds are "piggy-backed" onto  
units being weatherized under the state's WAP. Therefore the  
program is only available to current WAP clients. The funds  
are administered by TDHCA and the work is carried out by the  
LIHEAP WAP network.

§96.87(d)(2)(iii)(E) • Refrigerator and air-conditioner lease-to-own programs  
§96.87(d)(2)(iii)(F) provide low-income households the opportunity to purchase a  
§96.87(e)(1)(vi) high efficiency refrigerator or air-conditioner by paying a  
§96.87(e)(2)(v) nominal, monthly fee. The refrigerators and air-conditioners  
§96.87(e)(3)(vii) are offered to the households well below market price. The  
utility pays for the remainder of the cost of the unit. The  
original units are assessed for cost-effectiveness in terms of  
energy savings potential of a replacement unit. The program is  
only available to LIHEAP eligible clients. The program is  
administered by TDHCA and the service is rendered by the  
LIHEAP and WAP network. TDHCA will claim the cost of  
the units less the lease fees as a leveraged resource.

§96.87(d)(2)(iii)(E) • The water savers program offers water savings devices such as  
§96.87(d)(2)(iii)(F) aerators and showerheads. By saving on hot water  
§96.87(e)(1)(v) consumption, the households save energy and reduce energy  
§96.87(e)(1)(vi) costs. Clients are not charged for the devices. Only LIHEAP  
eligible clients may participate in the program. The program is  
administered by TDHCA and the service is rendered by the  
LIHEAP and WAP network.

Additional funds for utility assistance for LIHEAP eligible clients.

§96.87(d)(2)(ii) TDHCA also administers petroleum violation escrow (PVE) funds.  
§96.87(b)(4) The funds were distributed to the state after October 1, 1990. The  
§96.87(e)(1)(iii) funds are used for the WAP, with emphasis placed on Subgrantees  
§96.87(e)(1)(vi) who also operate the previously described utility financed "Piggy-

Back" program.

TDHCA continues to work with the Public Utility Commission, the Texas Railroad Commission, the Governor's Energy Office and utilities to advocate for the enhancement and development of additional services for low-income energy consumers.

#### IV. SUMMARY OF LIHEAP ASSURANCES

Texas, through TDHCA, has met or will meet all federal requirements, as follows:

- Texas will use the funds provided by LIHEAP only for the purposes specified in the approved application.
- Texas has sufficient fiscal control and funding accountability to adequately safeguard the disbursement and accountability of funds awarded.
- An audit, as required by P.L. 97-35, Title XXVI, Section 2605 (b) (10) and other applicable federal regulations, will be performed by an agency independent of TDHCA.
- Texas will submit a report containing the amount of the state's original allotment which the state desires to remain available for expenditure in the succeeding fiscal year, not to exceed 10 percent of the original amount. All FFY 99 funds shall be obligated prior to October 1, 1999.
- Texas held a public hearing to obtain comments on LIHEAP.
- Payments to households made under LIHEAP will not be counted as income or resources for any purpose relating to taxation, food stamps, public assistance or welfare programs unless legislation is enacted in express limitation thereof.
- No LIHEAP funds will be used to provide benefits or services to individuals or households whose income exceeds 125% of the FFY 99 or updated poverty income guidelines.
- The highest benefits will be paid to households having the highest energy costs and/or needs, and the lowest income, taking into account family size.
- Texas will not expend more than 10 percent of the funds for administrative purposes.
- Texas has no income limit on eligibility other than the 125% of the federal poverty guidelines for all LIHEAP benefits.
- Texas will abide by all nondiscrimination requirements.

**V. CERTIFICATIONS**

Certification Regarding Lobbying

Debarment and Suspension

Drug-free Workplace Requirement Certification





## **CERTIFICATION REGARDING LOBBYING**

**DEPARTMENT OF HEALTH AND HUMAN SERVICES**

**ADMINISTRATION FOR CHILDREN AND FAMILIES**

### **Certification for Contracts, Grants, Loans and Cooperative Agreements**

The undersigned certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.

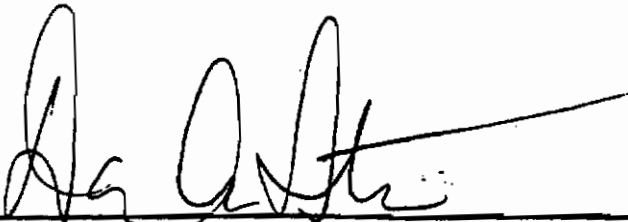
(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly.

This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by Section 1352, Title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

Statement for Loan Guarantees and Loan Insurance

The undersigned states, to the best of his or her knowledge and belief, that:

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form -LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions.



Signature

Executive Director

Title

Texas Department of Housing & Community Affairs

Organization

November 22, 1999

12/8/99.

Date

N/A

Grant Number

**Certification Regarding Debarment, Suspension, and Other  
Responsibility Matters - Primary Covered Transactions**

**Instructions for Certification**

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.
2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. If necessary, the prospective participant shall submit an explanation of why it cannot provide the certification. The certification or explanation will be considered in connection with the Department of Health and Human Services' (HHS) determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or explanation shall disqualify such person from participation in this transaction.
3. The certification in this clause is a material representation of fact upon which reliance was placed when HHS determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.
4. The prospective primary participant shall provide immediate written notice to the HHS agency to whom this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.
5. The terms "covered transaction," "debarred," "suspended," "ineligible," "lower tier covered transaction," "participant," "person," "primary covered transaction," "principal," "proposal," and "voluntarily excluded," as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549: 45 CFR Part 76. See the attached definitions.
6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by HHS.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion - Lower Tier Covered Transactions," provided by HHS, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.
8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the Nonprocurement List (of excluded parties).
9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.
10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, HHS may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other  
Responsibility Matters - Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from covered transactions by any Federal department or agency;

(b) have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) are not presently indicted for otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1) (b) of this certification; and

(d) have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Grant No. \_\_\_\_\_

N/A

Signature \_\_\_\_\_

12-8-99  
11/22/99

\_\_\_\_\_ Date

**U.S. Department of Health and Human Services**  
**Certification Regarding Drug-Free Workplace Requirements**  
**Grantees Other Than Individuals**

By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.

This certification is required by regulations implementing the Drug-Free Workplace Act of 1988, 45 CFR Part 76, Subpart F. The regulations, published in the May 25, 1990 Federal Register, require certification by grantees that they will maintain a drug-free workplace. The certification set out below is a material representation of fact upon which reliance will be placed when the Department of Health and Human Services (HHS) determines to award the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, HHS, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act. False certification or violation of the certification shall be grounds for suspension of payments, suspension or termination of grants, or governmentwide suspension or debarment.

Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.

Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios.)

If the workplace identified to HHS changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously identified the workplaces in question (see above).

Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

"Controlled substance" means a controlled substance in Schedules I through V of the Controlled Substances Act (21 USC 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15).

"Conviction" means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;

"Criminal drug statute" means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;

"Employee" means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All "direct charge" employees; (ii) all "indirect charge" employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).

The grantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about:

(1) The dangers of drug abuse in the workplace; (2) The grantee's policy of maintaining a drug-free workplace; (3) Any available drug counseling, rehabilitation, and employee assistance programs; and, (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

(c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will:

(1) Abide by the terms of the statement; and, (2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within ten calendar days after receiving notice under subparagraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

*(Continued on reverse side of this sheet)*

HHS—Certification Regarding Drug-Free Workplace Requirements—continued from reverse page

(f) Taking one of the following actions, within 30 calendar days of receiving notice under subparagraph (d)(2), with respect to any employee who is so convicted:

(1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or, (2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

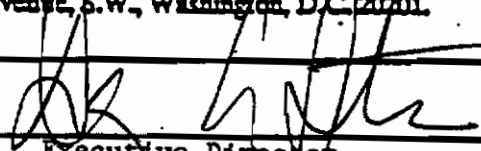
(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

The grantee may insert in the space provided below the site(s) for the performance of work done in connection with this specific grant (use attachments, if needed):

Place of Performance (Street address, City, County, State, ZIP Code) \_\_\_\_\_

Check  if there are workplaces on file that are not identified here.

Sections 76.630(c) and (d)(2) and 76.635(a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central receipt point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, S.W., Washington, D.C. 20201.

Signature  \_\_\_\_\_ Date 12/8/99  
11/22/99

Title Executive Director

Organization Texas Department of Housing & Community Affairs

## **VI. ATTACHMENTS**

**LIHEAP Household Report**

**FFY 99 Texas Weatherization Assistance Program State Plan**

**List of TDHCA Subgrantees operating LIHEAP programs**

**FFY 00 LIHEAP Intended Use Report**



The LIHEAP Household Report for use by the 50 States, District of Columbia, and insular areas with annual LIHEAP allotments of \$200,000 or more provides data on both LIHEAP recipient and applicant households for Federal Fiscal Year (FFY) 1999, the period of October 1, 1998 - September 30, 1999. The Report consists of the following sections:

Recommended (1) Long Format for LIHEAP Assisted Households and (2) Format for LIHEAP Applicant Households.

NOTE- There are two types of report data: (1) required data which must be reported under the LIHEAP statute and (2) requested data which are optional, as indicated by Senate Report 103-251. Both the LIHEAP Household Report (in Excel 97; file name is hhrp1st.xls) and the instructions on completing the LIHEAP Household Report (in Word 97; file name is hhrp1st.doc) can be downloaded at the Division of Energy Assistance's web site at: <http://www.acf.dhhs.gov/programs/liheap/forms.htm>  
 NOTE:-Do not enter the number of assisted households in the second column as the number will be calculated automatically when the poverty level data are entered.

Do this data below include estimated figures?  Yes  No  If "yes," please place a check mark beside each entry that is estimated.

1. RECOMMENDED LONG FORMAT FOR LIHEAP ASSISTED HOUSEHOLDS

Type of assistance	Number of assisted households	REQUIRED DATA					REQUIRED DATA			
		1998 household poverty level using gross income and household size	101%-125% poverty	126%-150% poverty	Over 150% poverty	At least one member who is 60 years or older	At least one member who is Disabled	At least one member who is Age 5 years or under	At least one member who is Age 3 years through 5 years	
Heating	16,176	10,065	5,921	2,190	0	7,504	8,679	3,899	1,918	3,899
Cooling	28,895	18,809	9,108	2,980	0	11,087	12,859	6,115	3,171	3,624
Winter/year round crisis	65,609	41,772	17,187	8,670	0	5,428	7,054	8,477	4,404	5,069
Summer crisis	0	0	0	0	0	0	0	0	0	0
Other crisis (specify)	0	0	0	0	0	0	0	0	0	0
Weatherization	3,867	1,927	1,212	728	0	1,869	1,392	859	429	502

Notes (continue on back if more space is needed):

Note: In addition to the households listed above, five (5) shelters were weatherized. Gross income data is unavailable for shelters.

2. RECOMMENDED FORMAT FOR LIHEAP APPLICANT HOUSEHOLDS (regardless of whether assisted)

Type of assistance	Number of applicant households	REQUIRED DATA					
		1998 household poverty level using gross income and household size	75%-100% poverty	101%-125% poverty	126%-150% poverty	Over 150% poverty	Income data unavailable
Heating	18,940	6,082	5,825	2,795	273	349	1516
Cooling	29,398	13,783	9,153	3,139	269	220	2832
Winter/year round crisis	64,819	36,343	17,219	7,390	471	1,050	2346
Summer crisis	0	0	0	0	0	0	0
Other crisis (specify)	0	0	0	0	0	0	0
Weatherization	7,572	2,421	1,869	1,085	157	59	1871

Notes (continue on back if more space is needed):

## **APPENDIX B**

### **Provisions for Program Year 2000 Comprehensive Energy Assistance Program (CEAP) Program Service Delivery Plan**

TEXAS  
COMPREHENSIVE ENERGY ASSISTANCE PROGRAM  
SERVICE DELIVERY PLAN  
CONTENT CHECKLIST

*conceptual framework  
based on standards  
outlined here!  
p 1 to 5*

Each service delivery plan must contain the items listed below in the following order:

- \_\_\_\_\_ Cover letter on agency/organization letterhead, including contact person(s), telephone number, and fax number, if available.
- \_\_\_\_\_ CEAP Service Delivery Plan Application (Attachment C). NOTE: The person signing this form must be the authorized signatory for the CEAP contract.
- \_\_\_\_\_ Table of Contents (must include page numbers).
- \_\_\_\_\_ Budget Information. (including Attachment D)
- \_\_\_\_\_ Numbered pages for the narrative.
- \_\_\_\_\_ Program Narrative (10 page limit), with descriptions of the:
  - Organization.
  - Unmet need in the service area.
  - Program objectives.
  - Direct Services Support activities.
  - Case Management activities.
  - CEAP components.

The Service Delivery Plan Content Checklist must be attached to the Service Delivery Plan upon submission to the Department.

Name of Organization: \_\_\_\_\_

Name of Authorized Signatory: \_\_\_\_\_

Signature of Authorized Signatory: \_\_\_\_\_ Date: \_\_\_\_\_

*342-5375*

**Provisions for Program Year 2000  
Comprehensive Energy Assistance Program (CEAP)  
Program Service Delivery Plan**

Contractor shall submit by November 15, 1999, to the Department one copy of the **Service Delivery Plan (SDP)** describing the methodology to plan, implement, and otherwise deliver allowable client assistance as authorized by the Comprehensive Energy Assistance Program contract, applicable assurances/issuances, and provisions of the Low-Income Home Energy Assistance Program. The narrative description of the Plan/Application shall be limited to 10 pages.

Contractor shall ensure that all applicable assurances as described in the FFY 2000 Intended Use Report are addressed. Contractor shall clearly state how it intends to address all applicable assurances, especially assurance # 1, 2, 3, 4, 5, 7, 13, and 16.

The CEAP Service Delivery Plan shall be submitted to the Department for review and changes may be negotiated to create an approved document to become an Attachment to the CEAP contract.

Review criteria may include, but are not limited to:

- Documentation of the nature and extent of the unmet energy needs in the area to be served.
- Adequacy of the proposed plan; extent to which the objectives and activities are responsive to the energy need, and are sound, meaningful, and feasible.
- Adequacy and appropriateness of the proposed staff's skills, responsibilities, and resources.
- Appropriateness and reasonableness of the proposed budget.

**I. SDP CONTENT AND FORMAT**

Each service delivery plan must contain the items listed below in the following order:

- A. Cover letter on agency/organization letterhead, including contact person(s), telephone number, and fax number, if available.
- B. CEAP Service Delivery Plan Application (Attachment C). **NOTE: The person signing this form must be the authorized signatory for the CEAP contract.**
- C. Table of Contents (must include page numbers).
- D. Budget Information, including Personnel form (Attachment D).

- E. Program Narrative (10 page limit, pages must be numbered), with descriptions of the:
- I. Organization.
  - II. Unmet need in the service area.
  - III. Available resources in the service area.
  - IV. Program objectives (see Attachment E).
  - V. Direct Services Support activities.
  - VI. Case Management activities.
  - VII. CEAP components (see Attachment A for minimum component requirements).

### **BUDGET INFORMATION**

The budget narrative must include a justification and explanation for contractor's administration, case management and direct services support. Administration is limited to 5.274 % of the total grant amount; case management is limited to 6.328% of the total grant amount and direct services support is limited to 5% of direct services funds. Expenditure of these budget categories is proportional to the expenditure of direct services funds. The budget should also include an explanation of the quantitative justification to support the budgeted costs by object class category. Contractors can use FFY 1999 allocation amounts for budgeting purposes. The contractors should note the restrictions put on expenditures of their funds by the CEAP contract and policy issuances. At minimum, the Department is interested in the basis for the estimates for each object class category below:

1. Personnel (use attached form)
  - a. List by title all positions and the percentages being supported by the budget and out of which budget category (case-management, direct services support or administration).
  - b. Identify the annual time commitments and annual compensation for each position.
  - c. Identify the compensation to be paid from this budget.
  - d. Brief description of the duties of each position and they relate to the budget categories.
2. Fringe Benefits  
Identify the items included as fringe benefits and explain how fringe benefits were computed.
3. Travel  
Provide an explanation and the basis for projected travel costs.
4. Equipment
  - a. Provide the cost basis for any equipment costing over \$500.00.
  - b. Provide cost percentages for equipment shared with other programs.
  - c. Explain the need for the equipment being proposed.
5. Supplies and Materials  
Provide the basis used in arriving at the major costs associated with materials and supplies proposed.
6. Contractual
  - a. Identify the projected purchase of goods and/or services.
  - b. Explain the need for using contracts to accomplish the program objectives.
  - c. Provide the basis for the amount estimated per contract.
  - d. If any sole source contracts for over \$1000 are contemplated at this time, provide supporting justification.

7. Other  
Identify the cost items and provide the basis for computing each category.
8. Provide procurement procedure for any purchases/subcontracts of \$10,000 and over for your total contract (e.g.: heating and cooling appliance purchases and services).

## PROGRAM NARRATIVE INSTRUCTIONS

The service delivery plan narrative must provide all the information requested and follow the order of the outline. Refer to Attachments A and B for minimum component requirements and terminological definitions. The narrative should be formatted with one inch margins and double spaced on 8 1/2" X 11" paper. Font size may not be smaller than 12. *The narrative may not exceed 10 pages.*

### **I. DESCRIPTION OF ORGANIZATION**

- A. Description of Organization and Services Provided
  1. Provide a general description of the organization.
  2. Describe current services:
    - a. Type of services provided.
    - b. Applicant intake process
    - c. Number of households served.
    - d. Demographic profile of households served (elderly, disabled, young children and ethnicity).
    - e. Target group(s) currently served.
    - f. Cities and/or counties served by the organization.
  3. Describe any restrictions (formal or informal policy or procedures) imposed by the organization on the provision of services and the basis for these restrictions.
  4. Provide any other pertinent organizational information.
- B. Previous CEAP Funding
  1. Describe the services provided with previous CEAP or other LIHEAP supported programs.
  2. Describe how previous CEAP funds have improved or increased services.
  3. Describe new resources accessed or developed during previous CEAP funding period(s).
  4. Enumerate the number of new clients served during 1999. For the purposes of the Service Delivery Plan, a new client is defined as a client not served in 1998.

### **II. UNMET NEED**

- A. Describe the nature and the extent of the unmet need for energy services for low-income persons in the service area.
- B. Complete the following list of information. This will assist TDHCA in assessing the nature and the extent of the unmet need for energy services for low-income persons in the service area and whether the program you propose to operate will address these problems. Provide the most current information that is available and provide references of source materials.
  1. Estimates on the number of low-income persons (at or below 125% of the Federal OMB poverty guidelines) in the service area.

2. Energy needs of the eligible population (i.e.: types of energy used, energy burden, etc.).
3. Description of the area's weather conditions for the Energy Crisis Component. Sample weather data is included with these instructions. Weather data can also be obtained at [www.ncdc.noaa.gov](http://www.ncdc.noaa.gov).
4. Demographic information on the eligible population, particularly as it pertains to the priority groups of the program. You may obtain information on demographics by contacting the Council of Governments or Regional Planning Commission in your area. This information can also be obtained from the Census Bureau at [www.census.gov](http://www.census.gov) or [www.txscd.tamu.edu](http://www.txscd.tamu.edu).
5. Other relevant information.

### III. AVAILABLE RESOURCES

Describe the resources available within your organization and outside your organization which provide assistance to low-income clients. Describe the types of services they provide and the limitations of these services.

1. Number of organizations serving the target group(s).
2. Inventory of existing energy services.
3. Available energy assistance and other resources, such as training and employment programs, in the organization's service area.

### IV. PROGRAM OBJECTIVES

The following are four primary objectives of CEAP as developed by the Evaluation Work Group. For FY 2000, each subgrantee must adopt at least one objective and describe in the service delivery plan what measures it will adopt and what data it will track to evaluate the achievement of the objective. Attachment E gives a more detailed description of the work done by the Evaluation Work Group and a list of proposed measures. Subgrantees may choose these measures or may develop their own measures. Subgrantees must report on their measures by the end of the program year.

1. To target energy assistance to low income households with the highest home energy needs, taking into account both energy burden and vulnerable household members.
2. To increase energy affordability while protecting health and safety for CEAP recipient households.
3. To increase efficiency of energy usage while protecting health and safety of low-income households.
4. To act as an advocate for low-income households with the community, social service providers and energy providers.

### V. DIRECT SERVICES SUPPORT (Outreach):

Limited to 5% of the direct services' funds.

Direct Services Support costs are costs that are not administrative in nature but are used for outreach, targeting and needs assessments to serve eligible households. Refer to the Glossary of Terms for definitions of outreach, targeting and needs assessment of the community. Describe:

1. How potential CEAP clients will be identified;
2. How each county of the service area will be served;
3. How historically under-served populations will be served;
4. How the priority groups under CEAP – the elderly, disabled and households with very young children and households with high energy burdens – will be served;
5. How the prioritization schema will be structured – the prioritization form must be submitted as part of this Plan;

*Perform as indicated*

6. How applications will be taken;
7. The location of outreach offices in the service area; and,
8. How the proposer will work through other entities in the counties to be served.

#### **VI. CASE MANAGEMENT (Coordination and Referral):**

Limited to 6.328% of the total grant allocation.

Provide an operational summary description of case management and referral activities (as defined in Attachment B) for CEAP. In describing case management activities, be specific in terms of the:

1. Coordination of services to client households through cooperative arrangements and clarification of procedures, roles and responsibilities of all stakeholders.
2. Coordination with other energy related programs, as required by the LIHEAP Act. Specifically, contractor must make documented referrals to the local Weatherization Assistance Program contractor.
3. Coordination with local energy vendors to arrange for arrearage reduction, reasonable or reduced payment schedules, or cost reductions.

#### **VII. PROJECT DESCRIPTION**

Provide an operational summary description of the four program components, based on the minimum requirements set out in Attachment A and using the definitions as outlined in Attachment B. Each component must identify the target group to be served and be accompanied by a time-line. Contractor must describe how the program will:

1. Target energy assistance to individuals who are most in need.
2. Provide energy budget/cost management services to help Co-pay component households to better manage their residential energy bill payments.
3. Provide energy demand/consumption management services, to help low income households reduce their residential energy needs and costs.
4. Arrange for arrearage reduction, reasonable or reduced payment schedules, or cost reductions through negotiation with energy vendors or other entities (include sample vendor agreement).
5. Provide services to reduce energy demand, consumption, and costs through such activities as making energy-related residential repairs and/or efficiency improvements, in coordination with weatherization contractors and in coordination with energy vendors as appropriate.
6. Provide energy conservation education services.
7. Describe how payments will be made to energy vendors, including a time-line of payments to the vendors.
8. Provide time-line for activity implementation by component.



## **APPENDIX C**

### **List of CEAP Service Delivery Plans Reviewed For Applied Research Project**

**Name of Organization****Fiscal Year Reviewed**

- |  |      |
|--|------|
| 1. Aspermont Small Business Development Center, Inc.<br>Aspermont, Texas                           | 2000 |
| 2. Bee Community Action Agency<br>Beeville, Texas  | 2000 |
| 3. Bexar County Housing and Human Services<br>San Antonio, Texas                                   | 1999 |
| 4. Big Bend Community Action Committee, Inc.<br>Marfa, Texas                                       | 1999 |
| 5. Brazos Valley Community Action Agency<br>Bryan, Texas   | 2000 |
| 6. Caprock Community Action Association, Inc.<br>Crosbyton, Texas                                  | 2000 |
| 7. Central Texas Opportunities, Inc.<br>Coleman, Texas   | 2000 |
| 8. Combined Community Action, Inc.<br>Smithville, Texas  | 1999 |
| 9. Community Action Committee of Victoria<br>Victoria, Texas                                       | 2000 |
| 10. Community Action Council of South Texas<br>Rio Grande City, Texas                              | 2000 |
| 11. Community Action, Inc. Hays, Caldwell & Blanco Counties<br>San Marcos, Texas                   | 2000 |
| 12. Community Action Program, Inc.<br>Abilene, Texas   | 1999 |
| 13. Community Council of Cass, Marion & Morris Counties, Inc.<br>Linden, Texas                     | 1999 |
| 14. Community Council of Reeves County<br>Pecos, Texas   | 1999 |
| 15. Community Council of Southwest Texas, Inc.<br>Uvalde, Texas                                    | 2000 |
| 16. Community Services Agency of Dimmit, LaSalle, &<br>Maverick Counties<br>Carrizo Springs, Texas | 1999 |

17. Community Services, Inc. Corsicana, Texas	2000
18. Dallas County Department of Health & Human Services Dallas, Texas	1999
19. Economic Action Committee of The Gulf Coast Bay City, Texas	1999
20. Economic Opportunities Advancement Corporation of Planning Region XI Waco, Texas	2000
21. Fort Worth, City of, Park Recreation and Community Services Department Forth Worth, Texas	1999
22. Galveston County Community Action Council, Inc. Galveston, Texas	1999
23. Hidalgo County Community Services Agency Edinburg, Texas	1999
24. Hill Country Community Action Association, Inc. San Saba, Texas	2000
25. Kleberg County Human Services Kingsville, Texas	2000
26. Montgomery County Emergency Assistance, Inc. Conroe, Texas	1999
27. Northeast Texas Opportunities, Inc. Mount Vernon, Texas	1999
28. Nueces County Community Action Agency Corpus Christi, Texas	2000
29. Palo Pinto Community Service Corporation Mineral Wells, Texas	2000
30. Panhandle Community Services Amarillo, Texas	2000
31. Pecos County Community Action Agency Fort Stockton, Texas	1999
32. People for Progress, Inc. Sweetwater, Texas	1999
33. Programs for Human Services, Inc. Orange, Texas	1999

34. San Angelo and Tom Green County Health Department San Angelo, Texas	2000	
35. Senior Citizens Services of Texarkana, Inc. Texarkana, Texas	1999	
36. Sheltering Arms, Inc. Houston, Texas	1999	
37. South Plains Community Action Association, Inc. Levelland, Texas	2000	
38. Texoma Council of Governments Sherman, Texas	1999	
39. Tom Green County Community Action Council San Angelo, Texas		1999
40. Travis County Human Services Department Austin, Texas	2000	
41. Tri-County Community Action Agency Center, Texas	1999	
42. Webb County Community Action Agency Laredo, Texas	2000	
43. West Texas Opportunities, Inc. Lamesa, Texas	1999	
44. Williamson-Burnet County Opportunities, Inc. Georgetown, Texas	1999	

## **APPENDIX D**

### **Summary Sheet for CEAP Service Delivery Plans**

PY2000 = 20  
 PY1999 = 24  
 No Plan on File = 7  
 N = 44

**TABLATION SHEET**

Service Delivery Plan Heading	Contains All	Contains Some	Contains None
<i>Required Elements</i>			
Cover Letter	37 84%	0	7 16%
CEAP Application - Attachment C	38 86%	0	6 14%
Table of Contents	38 86%	0	6 14%
Numbered Pages	41 93%	0	3 7%
<i>Budget Information</i>			
Personnel Form - Attachment D	32 73%	0	12 27%
Description of Fringe Benefits	34 77%	2 5%	8 18%
Description of Travel	32 73%	1 2%	11 25%
Description of Equipment Over \$500	1 2%	3 7%	40 91%
Description of Supplies and Materials	26 59%	0	18 41%
Description of Contractual Services	17 39%	1 2%	26 59%
Procurement Procedures	12 27%	2 5%	30 68%
<i>Program Narrative - Description of Organization</i>			
Types of Current Services	39 89%	4 9%	1 2%
Application Intake Process	31 70%	5 11%	8 18%
Number of Households Served	34 77%	4 9%	6 14%
Demographic Profile of Households	26 59%	3 7%	15 34%
Target Groups Currently Served	34 77%	5 11%	5 11%

Service Delivery Plan Heading	Contains All	Contains Some	Contains None
Cities/Countries Served	41 93%	1 2%	2 5%
Organization Restriction	24 55%	1 2%	19 43%
Previous CEAP Funding	32 73%	4 9%	8 18%
CEAP Funds Have Improved Services	27 61%	6 14%	11 25%
New Resources Accessed During Previous Period	17 39%	7 16%	20 45%
Number of New Clients Served in 1998	29 66%	0	15 34%
<i>Unmet Need</i>			
Extent of Unmet Energy Services Need	29 66%	11 25%	4 9%
Number of Low-income Persons in Service Area	42 95%	2 5%	0
Energy Need of Eligible Population	29 66%	9 20%	6 14%
Description of Area's Weather	36 82%	6 14%	2 5%
Demographic Info. on Eligible Pop.	41 93%	1 2%	2 5%
<i>Available Resources</i>			
Organizations Serving Target Group	32 73%	8 18%	4 9%
Inventory of Existing Energy Services	28 64%	6 14%	10 23%
Available Energy Assistance and Other Resources	30 68%	7 16%	7 16%
<i>Program Objectives</i>			
Adoption of 1 of 4 primary objectives - 1 2 3 4	38 86%	0	6 14%
<i>Direct Services Support</i>			
Describe Client Identification	40 91%	3 7%	1 2%
Describe How Counties Will Be Served	33 75%	7 16%	4 9%
Describe How Underserved Pop. Will Be Served	31 70%	11 25%	2 5%
Describe How CEAP Priority Groups Will Be Served	30 68%	10 23%	4 9%

Service Delivery Plan Heading	Contains All	Contains Some	Contains None
Description of Prioritization Schema	11 25%	11 25%	22 50%
Copy of Prioritization Form	37 84%	0	7 16%
Describe Application Process	15 34%	9 20%	20 45%
Describe Location of Outreach Offices	28 64%	4 9%	12 27%
Describe Coordination With Agencies	19 43%	17 39%	8 18%
<i>Case Management</i>			
Describe Cooperative Agreements	9 20%	20 45%	15 34%
Describe Coordination With Energy Related Programs	12 27%	16 36%	16 36%
Describe Coordination With Local Energy Vendors	16 36%	16 36%	12 27%
<i>Project Description of Four Program Components</i>			
Identify Target Group	44 100%	0	0
Provide Energy Budget/Cost Mgt. to Co-Pay Clients	44 100%	0	0
Provide Energy Demand Consumption Mgt. Services	43 98%	1 2%	0
Arrange for Arrearage Reduction With Energy Vendors	22 50%	12 27%	10 23%
Provide Energy Conservation Ed.	43 98%	1 2%	0
Describe Payments To Vendors	18 41%	6 14%	20 45%
Time-Line for Activities By Component	8 18%	3 7%	33 75%



## **APPENDIX E**

### **Comparison of Median Incomes Poverty Rates for Counties in Texas**

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>Anderson</b> <b>\$36,200*</b>	30% of median	10,850	16,700	20,875	65%	52%
	50% of median	18,100	16,700	20,875	108%	87%
	60% of median	21,720	16,700	20,875	130%	104%
<b>Andrews</b> <b>\$41,500*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Angelina</b> <b>\$39,300*</b>	30% of median	11,300	16,700	20,875	68%	54%
	50% of median	18,800	16,700	20,875	113%	90%
	60% of median	22,560	16,700	20,875	135%	108%
<b>Aransas</b> <b>\$35,300*</b>	30% of median	10,600	16,700	20,875	63%	51%
	50% of median	17,650	16,700	20,875	106%	85%
	60% of median	21,180	16,700	20,875	127%	101%
<b>Armstrong</b> <b>\$39,300*</b>	30% of median	11,800	16,700	20,875	71%	57%
	50% of median	19,650	16,700	20,875	118%	94%
	60% of median	23,580	16,700	20,875	141%	113%
<b>Atascosa</b> <b>\$32,400*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Austin</b> <b>\$44,600*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Bailey</b> <b>\$29,200*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Bandera</b> <b>\$37,400*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Baylor</b> <b>\$38,100*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Bee</b> <b>\$31,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Bell</b> <b>\$39,000*</b>	30% of median	11,700	16,700	20,875	70%	56%
	50% of median	19,500	16,700	20,875	117%	93%
	60% of median	23,400	16,700	20,875	140%	112%
<b>Bexar</b> <b>\$41,900*</b>	30% of median	12,550	16,700	20,875	75%	60%
	50% of median	20,950	16,700	20,875	125%	100%
	60% of median	25,140	16,700	20,875	151%	120%
<b>Blanco</b> <b>\$33,600*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Borden</b> <b>\$40,400*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Bosque</b> <b>\$35,400*</b>	30% of median	10,600	16,700	20,875	63%	51%
	50% of median	17,700	16,700	20,875	106%	85%
	60% of median	21,240	16,700	20,875	127%	102%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4= 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 =20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>Bowie</b> \$38,100*	30% of median	11,450	16,700	20,875	69%	55%
	50% of median	19,050	16,700	20,875	114%	91%
	60% of median	22,860	16,700	20,875	137%	110%
<b>Brazoria</b> \$54,400*	30% of median	16,300	16,700	20,875	98%	78%
	50% of median	27,200	16,700	20,875	163%	130%
	60% of median	32,640	16,700	20,875	195%	156%
<b>Brazos</b> \$42,400*	30% of median	12,700	16,700	20,875	76%	61%
	50% of median	21,200	16,700	20,875	127%	102%
	60% of median	25,440	16,700	20,875	152%	122%
<b>Brewster</b> \$30,700*	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Briscoe</b> \$29,100*	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Brooks</b> \$22,500*	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Brown</b> \$34,400*	30% of median	10,300	16,700	20,875	62%	49%
	50% of median	17,200	16,700	20,875	103%	82%
	60% of median	20,640	16,700	20,875	124%	99%
<b>Burleson</b> \$35,700*	30% of median	10,700	16,700	20,875	64%	51%
	50% of median	17,850	16,700	20,875	107%	86%
	60% of median	21,420	16,700	20,875	128%	103%
<b>Burnet</b> \$36,500*	30% of median	10,950	16,700	20,875	66%	52%
	50% of median	18,250	16,700	20,875	109%	87%
	60% of median	21,900	16,700	20,875	131%	105%
<b>Calhoun</b> \$43,200*	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Callahan</b> \$37,600*	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Cameron</b> \$26,900*	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Camp</b> \$37,500*	30% of median	11,250	16,700	20,875	67%	54%
	50% of median	18,750	16,700	20,875	112%	90%
	60% of median	22,500	16,700	20,875	135%	108%
<b>Carson</b> \$49,100*	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Cass</b> \$34,100*	30% of median	10,250	16,700	20,875	61%	49%
	50% of median	17,050	16,700	20,875	102%	82%
	60% of median	20,460	16,700	20,875	123%	98%
<b>Castro</b>	30% of median	10,150	16,700	20,875	61%	49%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4= 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 =20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>\$30,300*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Cherokee</b> <b>\$38,300*</b>	30% of median	10,800	16,700	20,875	65%	52%
	50% of median	18,150	16,700	20,875	108%	87%
	60% of median	21,780	16,700	20,875	130%	104%
<b>Childress</b> <b>\$32,500*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Clay</b> <b>\$36,600*</b>	30% of median	11,000	16,700	20,875	66%	53%
	50% of median	18,300	16,700	20,875	110%	88%
	60% of median	21,960	16,700	20,875	131%	105%
<b>Cochran</b> <b>\$28,800*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Coke</b> <b>\$30,000*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Coleman</b> <b>\$24,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Collingsworth</b> <b>\$28,800*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Colorado</b> <b>\$35,000*</b>	30% of median	10,500	16,700	20,875	63%	50%
	50% of median	17,500	16,700	20,875	105%	84%
	60% of median	21,000	16,700	20,875	126%	101%
<b>Comanche</b> <b>\$30,600*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Concho</b> <b>\$30,600*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Cooke</b> <b>\$39,700*</b>	30% of median	11,600	16,700	20,875	69%	56%
	50% of median	19,350	16,700	20,875	116%	93%
	60% of median	23,220	16,700	20,875	139%	111%
<b>Cottle</b> <b>\$27,200*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Crane</b> <b>\$45,200*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Crockett</b> <b>\$32,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Crosby</b> <b>\$27,200*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4 = 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 = 20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%	
		Family of 4	Rate	Rate			
Culberson	30% of median	10,150	16,700	20,875	61%	49%	
	\$22,200*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Dallam	30% of median	10,150	16,700	20,875	61%	49%	
	\$33,700*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Dallas	30% of median	17,450	16,700	20,875	104%	84%	
	\$58,200*	50% of median	29,100	16,700	20,875	174%	139%
		60% of median	34,920	16,700	20,875	209%	167%
Dawson	30% of median	10,150	16,700	20,875	61%	49%	
	\$30,800*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Deaf Smith	30% of median	10,200	16,700	20,875	61%	49%	
	\$34,000*	50% of median	17,000	16,700	20,875	102%	81%
		60% of median	20,400	16,700	20,875	122%	98%
Delta	30% of median	11,050	16,700	20,875	66%	53%	
	\$43,300*	50% of median	18,400	16,700	20,875	110%	88%
		60% of median	22,080	16,700	20,875	132%	106%
DeWitt	30% of median	10,500	16,700	20,875	63%	50%	
	\$35,000*	50% of median	17,500	16,700	20,875	105%	84%
		60% of median	21,000	16,700	20,875	126%	101%
Dickens	30% of median	10,150	16,700	20,875	61%	49%	
	\$28,500*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Dimmit	30% of median	10,150	16,700	20,875	61%	49%	
	\$19,000*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Donley	30% of median	10,150	16,700	20,875	61%	49%	
	\$29,500*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Duval	30% of median	10,150	16,700	20,875	61%	49%	
	\$22,400*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Eastland	30% of median	10,150	16,700	20,875	61%	49%	
	\$28,400*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Ector	30% of median	11,950	16,700	20,875	72%	57%	
	\$39,800*	50% of median	19,900	16,700	20,875	119%	95%
		60% of median	23,880	16,700	20,875	143%	114%
Edwards	30% of median	10,150	16,700	20,875	61%	49%	
	\$23,500*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
El Paso	30% of median	10,250	16,700	20,875	61%	49%	
	\$34,100*	50% of median	17,050	16,700	20,875	102%	82%
		60% of median	20,460	16,700	20,875	123%	98%
Erath	30% of median	11,300	16,700	20,875	68%	54%	
	\$37,700*	50% of median	18,850	16,700	20,875	113%	90%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4= 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 =20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
	60%of median	22,620			135%	108%
<b>Falls</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$30,900*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Fannin</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$40,000*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Fayette</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$38,200*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Fisher</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$29,100*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Floyd</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$31,300*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Foard</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$29,900*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Franklin</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$44,200*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Freestone</b>	30% of median	10,900	16,700	20,875	65%	52%
<b>\$36,400*</b>	50% of median	18,200	16,700	20,875	109%	87%
	60%of median	21,840	16,700	20,875	131%	105%
<b>Frio</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$23,200*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Gaines</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$32,400*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Galveston</b>	30% of median	15,650	16,700	20,875	94%	75%
<b>\$52,100*</b>	50% of median	26,050	16,700	20,875	156%	125%
	60%of median	31,260	16,700	20,875	187%	150%
<b>Garza</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$30,300*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Gillespie</b>	30% of median	12,350	16,700	20,875	74%	59%
<b>\$41,200*</b>	50% of median	20,600	16,700	20,875	123%	99%
	60%of median	24,720	16,700	20,875	148%	118%
<b>Glasscock</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$38,800*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Goliad</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$31,500*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Gonzales</b>	30% of median	10,150	16,700	20,875	61%	49%

\* Denotes Median Income

State MSA Median 42,300 100%Poverty Rate for Family of 4= 16,700

State County Median 34,700 125%Poverty Rate for Family of 4 =20,875

### Comparison of Median Incomes Poverty Rates for Counties

COUNTY	AMFI			Rate	Rate	AMFI/100%	AMFI/125%
	Family of 4	100% Poverty	125% Poverty				
\$32,400*	50% of median	16,950	16,700	20,875	101%	81%	97%
	30% of median	11,750	16,700	20,875	70%	56%	
\$41,600*	50% of median	19,600	16,700	20,875	117%	94%	
	30% of median	11,750	16,700	20,875	70%	56%	
	60% of median	23,520	16,700	20,875	141%	113%	
Grayson	30% of median	12,650	16,700	20,875	76%	61%	
	50% of median	21,050	16,700	20,875	126%	101%	
	60% of median	25,260	16,700	20,875	151%	121%	
Grimes	30% of median	10,750	16,700	20,875	64%	51%	
	50% of median	17,900	16,700	20,875	107%	86%	
	60% of median	21,480	16,700	20,875	129%	103%	
Hale	30% of median	10,350	16,700	20,875	62%	50%	
	50% of median	17,250	16,700	20,875	103%	83%	
	60% of median	20,700	16,700	20,875	124%	99%	
Hall	30% of median	10,150	16,700	20,875	61%	49%	
	50% of median	16,950	16,700	20,875	101%	81%	
	60% of median	20,340	16,700	20,875	122%	97%	
Hamilton	30% of median	10,150	16,700	20,875	61%	49%	
	50% of median	16,950	16,700	20,875	101%	81%	
	60% of median	20,340	16,700	20,875	122%	97%	
Hardeman	30% of median	10,450	16,700	20,875	63%	50%	
	50% of median	17,450	16,700	20,875	104%	84%	
	60% of median	20,940	16,700	20,875	125%	100%	
Harris	30% of median	16,250	16,700	20,875	97%	78%	
	50% of median	27,050	16,700	20,875	162%	130%	
	60% of median	32,460	16,700	20,875	194%	155%	
Harrison	30% of median	11,950	16,700	20,875	72%	57%	
	50% of median	19,950	16,700	20,875	119%	96%	
	60% of median	23,940	16,700	20,875	143%	115%	
Hartley	30% of median	11,050	16,700	20,875	66%	53%	
	50% of median	18,400	16,700	20,875	110%	88%	
	60% of median	22,080	16,700	20,875	132%	106%	
Haskell	30% of median	10,600	16,700	20,875	63%	51%	
	50% of median	17,700	16,700	20,875	106%	85%	
	60% of median	21,240	16,700	20,875	127%	102%	
Hays	30% of median	16,600	16,700	20,875	99%	80%	
	50% of median	27,700	16,700	20,875	166%	133%	
	60% of median	33,240	16,700	20,875	199%	159%	
Hemphill	30% of median	11,400	16,700	20,875	68%	55%	
	50% of median	19,000	16,700	20,875	114%	91%	
	60% of median	22,800	16,700	20,875	137%	109%	
Hidalgo	30% of median	10,150	16,700	20,875	61%	49%	
	50% of median	16,950	16,700	20,875	101%	81%	
	60% of median	20,340	16,700	20,875	122%	97%	

\* Denotes Median Income  
 State USA Median 42,300 100%Poverty Rate for Family of 4= 16,700  
 State USA Median 34,700 125%Poverty Rate for Family of 4= 20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>Hill</b> <b>\$34,300*</b>	30% of median	10,300	16,700	20,875	62%	49%
	50% of median	17,150	16,700	20,875	103%	82%
	60% of median	20,580	16,700	20,875	123%	99%
<b>Hockley</b> <b>\$37,300*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Hopkins</b> <b>\$34,200*</b>	30% of median	10,250	16,700	20,875	61%	49%
	50% of median	17,100	16,700	20,875	102%	82%
	60% of median	20,520	16,700	20,875	123%	98%
<b>Houston</b> <b>\$29,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Howard</b> <b>\$37,600*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Hudspeth</b> <b>\$21,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Huthinson</b> <b>\$44,200*</b>	30% of median	11,400	16,700	20,875	68%	55%
	50% of median	19,000	16,700	20,875	114%	91%
	60% of median	22,800	16,700	20,875	137%	109%
<b>Irion</b> <b>\$31,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Jack</b> <b>\$35,000*</b>	30% of median	10,500	16,700	20,875	63%	50%
	50% of median	17,500	16,700	20,875	105%	84%
	60% of median	21,000	16,700	20,875	126%	101%
<b>Jackson</b> <b>\$36,000*</b>	30% of median	10,800	16,700	20,875	65%	52%
	50% of median	18,000	16,700	20,875	108%	86%
	60% of median	21,600	16,700	20,875	129%	103%
<b>Jasper</b> <b>\$35,000*</b>	30% of median	10,500	16,700	20,875	63%	50%
	50% of median	17,500	16,700	20,875	105%	84%
	60% of median	21,000	16,700	20,875	126%	101%
<b>Jeff Davis</b> <b>\$30,200*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Jefferson</b> <b>\$43,200*</b>	30% of median	12,950	16,700	20,875	78%	62%
	50% of median	21,600	16,700	20,875	129%	103%
	60% of median	25,920	16,700	20,875	155%	124%
<b>Jim Hogg</b> <b>\$27,600*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Jim Wells</b> <b>\$31,800*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Jones</b> <b>\$35,100*</b>	30% of median	10,550	16,700	20,875	63%	51%
	50% of median	17,550	16,700	20,875	105%	84%
	60% of median	21,060	16,700	20,875	126%	101%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4 = 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 = 20,875



## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>Karnes</b> <b>\$26,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Kendall</b> <b>\$55,800*</b>	30% of median	13,000	16,700	20,875	78%	62%
	50% of median	21,650	16,700	20,875	130%	104%
	60% of median	25,980	16,700	20,875	156%	124%
<b>Kenedy</b> <b>\$25,000*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Kent</b> <b>\$30,800*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Kerr</b> <b>\$39,400*</b>	30% of median	11,800	16,700	20,875	71%	57%
	50% of median	19,700	16,700	20,875	118%	94%
	60% of median	23,640	16,700	20,875	142%	113%
<b>Kimble</b> <b>\$31,400*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>King</b> <b>\$41,800*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Kinney</b> <b>\$25,800*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Kleberg</b> <b>\$35,300*</b>	30% of median	10,600	16,700	20,875	63%	51%
	50% of median	17,650	16,700	20,875	106%	85%
	60% of median	21,180	16,700	20,875	127%	101%
<b>Knox</b> <b>\$30,600*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Lamar</b> <b>\$37,600*</b>	30% of median	11,300	16,700	20,875	68%	54%
	50% of median	18,800	16,700	20,875	113%	90%
	60% of median	22,560	16,700	20,875	135%	108%
<b>Lamb</b> <b>\$30,400*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Lampasas</b> <b>\$37,600*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>La Salle</b> <b>\$26,800*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Lavaca</b> <b>\$38,200*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Lee</b> <b>\$39,600*</b>	30% of median	11,300	16,700	20,875	68%	54%
	50% of median	18,850	16,700	20,875	113%	90%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4 = 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 = 20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
	60%of median	22,620	16,700	20,875	135%	108%
<b>Leon</b>	30% of median	11,350	16,700	20,875	68%	54%
<b>\$38,100*</b>	50% of median	18,950	16,700	20,875	113%	91%
	60%of median	22,740	16,700	20,875	136%	109%
<b>Limestone</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$32,600*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Lipscomb</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$39,900*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Live Oak</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$37,600*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Llano</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$33,300*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Loving</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$42,600*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Lubbock</b>	30% of median	12,850	16,700	20,875	77%	62%
<b>\$42,900*</b>	50% of median	21,450	16,700	20,875	128%	103%
	60%of median	25,740	16,700	20,875	154%	123%
<b>Lynn</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$28,700*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>McCulloch</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$30,900*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>McLennan</b>	30% of median	12,800	16,700	20,875	77%	61%
<b>\$42,700*</b>	50% of median	21,350	16,700	20,875	128%	102%
	60%of median	25,620	16,700	20,875	153%	123%
<b>McMullen</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$38,500*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Madison</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$28,600*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Marion</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$28,600*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Martin</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$28,400*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Mason</b>	30% of median	10,250	16,700	20,875	61%	49%
<b>\$34,100*</b>	50% of median	17,050	16,700	20,875	102%	82%
	60%of median	20,460	16,700	20,875	123%	98%

\* Denotes Median income

State MSA Median 42,300 100%Poverty Rate for Family of 4= 16,700

State County Median 34,700 125%Poverty Rate for Family of 4 =20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>Matagorda</b>	30% of median	11,550	16,700	20,875	69%	55%
	<b>\$38,500*</b>	19,250	16,700	20,875	115%	92%
	60% of median	23,100	16,700	20,875	138%	111%
<b>Maverick</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$20,200*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Medina</b>	30% of median	11,050	16,700	20,875	66%	53%
	<b>\$39,000*</b>	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Menard</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$24,400*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Midland</b>	30% of median	11,950	16,700	20,875	72%	57%
	<b>\$39,800*</b>	19,900	16,700	20,875	119%	95%
	60% of median	23,880	16,700	20,875	143%	114%
<b>Milam</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$32,200*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Mills</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$30,500*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Mitchell</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$32,700*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Montague</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$33,600*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Moore</b>	30% of median	11,050	16,700	20,875	66%	53%
	<b>\$40,700*</b>	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Morris</b>	30% of median	11,000	16,700	20,875	66%	53%
	<b>\$36,700*</b>	18,350	16,700	20,875	110%	88%
	60% of median	22,020	16,700	20,875	132%	105%
<b>Motley</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$27,100*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Nacogdoches</b>	30% of median	11,950	16,700	20,875	72%	57%
	<b>\$39,900*</b>	19,950	16,700	20,875	119%	96%
	60% of median	23,940	16,700	20,875	143%	115%
<b>Navarro</b>	30% of median	10,900	16,700	20,875	65%	52%
	<b>\$36,400*</b>	18,200	16,700	20,875	109%	87%
	60% of median	21,840	16,700	20,875	131%	105%
<b>Newton</b>	30% of median	10,150	16,700	20,875	61%	49%
	<b>\$28,100*</b>	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Nolan</b>	30% of median	10,400	16,700	20,875	62%	50%
	<b>\$34,600*</b>	17,300	16,700	20,875	104%	83%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4= 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 =20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
	60%of median	20,760	16,700	20,875	124%	99%
<b>Nueces</b>	30% of median	12,200	16,700	20,875	73%	58%
<b>\$40,600*</b>	50% of median	20,300	16,700	20,875	122%	97%
	60%of median	24,360	16,700	20,875	146%	117%
<b>Ochiltree</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$41,200*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60%of median	22,080	16,700	20,875	132%	106%
<b>Oldham</b>	30% of median	11,950	16,700	20,875	72%	57%
<b>\$43,300*</b>	50% of median	19,900	16,700	20,875	119%	95%
	60%of median	23,880	16,700	20,875	143%	114%
<b>Orange</b>	30% of median	12,950	16,700	20,875	78%	62%
<b>\$43,200*</b>	50% of median	21,600	16,700	20,875	129%	103%
	60%of median	25,920	16,700	20,875	155%	124%
<b>Palo Pinto</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$32,400*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Panola</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$31,400*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Parmer</b>	30% of median	10,350	16,700	20,875	62%	50%
<b>\$34,500*</b>	50% of median	17,250	16,700	20,875	103%	83%
	60%of median	20,700	16,700	20,875	124%	99%
<b>Pecos</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$29,900*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Polk</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$31,700*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Potter</b>	30% of median	12,600	16,700	20,875	75%	60%
<b>\$42,000*</b>	50% of median	21,000	16,700	20,875	126%	101%
	60%of median	25,200	16,700	20,875	151%	121%
<b>Presidio</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$25,800*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Rains</b>	30% of median	10,850	16,700	20,875	65%	52%
<b>\$36,100*</b>	50% of median	18,050	16,700	20,875	108%	86%
	60%of median	21,660	16,700	20,875	130%	104%
<b>Reagan</b>	30% of median	10,550	16,700	20,875	63%	51%
<b>\$35,200*</b>	50% of median	17,600	16,700	20,875	105%	84%
	60%of median	21,120	16,700	20,875	126%	101%
<b>Real</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$26,500*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Red River</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$30,000*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60%of median	20,340	16,700	20,875	122%	97%
<b>Reeves</b>	30% of median	10,150	16,700	20,875	61%	49%

\* Denotes Median Income

State MSA Median 42,300 100%Poverty Rate for Family of 4= 16,700

State County Median 34,700 125%Poverty Rate for Family of 4 =20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
<b>\$25,600*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Refugio</b> <b>\$34,100*</b>	30% of median	10,250	16,700	20,875	61%	49%
	50% of median	17,050	16,700	20,875	102%	82%
	60% of median	20,460	16,700	20,875	123%	98%
<b>Roberts</b> <b>\$38,800*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Robertson</b> <b>\$35,000*</b>	30% of median	10,500	16,700	20,875	63%	50%
	50% of median	17,500	16,700	20,875	105%	84%
	60% of median	21,000	16,700	20,875	126%	101%
<b>Runnels</b> <b>\$32,700*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Rusk</b> <b>\$40,000*</b>	30% of median	11,050	16,700	20,875	66%	53%
	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Sabine</b> <b>\$31,100*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>San Augustine</b> <b>\$26,400*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>San Jacinto</b> <b>\$31,700*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>San Saba</b> <b>\$27,500*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Schleicher</b> <b>\$35,000*</b>	30% of median	10,500	16,700	20,875	63%	50%
	50% of median	17,500	16,700	20,875	105%	84%
	60% of median	21,000	16,700	20,875	126%	101%
<b>Scurry</b> <b>\$39,000*</b>	30% of median	11,450	16,700	20,875	69%	55%
	50% of median	19,050	16,700	20,875	114%	91%
	60% of median	22,860	16,700	20,875	137%	110%
<b>Shackelford</b> <b>\$31,600*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Shelby</b> <b>\$30,900*</b>	30% of median	10,150	16,700	20,875	61%	49%
	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Sherman</b> <b>\$35,000*</b>	30% of median	10,500	16,700	20,875	63%	50%
	50% of median	17,500	16,700	20,875	105%	84%
	60% of median	21,000	16,700	20,875	126%	101%
<b>Somervell</b> <b>\$37,200*</b>	30% of median	11,150	16,700	20,875	67%	53%
	50% of median	18,600	16,700	20,875	111%	89%
	60% of median	22,320	16,700	20,875	134%	107%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4 = 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 = 20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%	
		Family of 4	Rate	Rate			
Smith	30% of median	13,200	16,700	20,875	79%	63%	
	\$44,000*	50% of median	22,000	16,700	20,875	132%	105%
		60% of median	26,400	16,700	20,875	158%	126%
Starr	30% of median	10,150	16,700	20,875	61%	49%	
	\$15,500*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Stephens	30% of median	10,150	16,700	20,875	61%	49%	
	\$32,200*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Sterling	30% of median	11,050	16,700	20,875	66%	53%	
	\$45,700*	50% of median	18,400	16,700	20,875	110%	88%
		60% of median	22,080	16,700	20,875	132%	106%
Stonewall	30% of median	10,150	16,700	20,875	61%	49%	
	\$32,300*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Sutton	30% of median	11,050	16,700	20,875	66%	53%	
	\$37,800*	50% of median	18,400	16,700	20,875	110%	88%
		60% of median	22,080	16,700	20,875	132%	106%
Swisher	30% of median	10,150	16,700	20,875	61%	49%	
	\$32,400*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Tarrant	30% of median	16,600	16,700	20,875	99%	80%	
	\$55,300*	50% of median	27,650	16,700	20,875	166%	132%
		60% of median	33,180	16,700	20,875	199%	159%
Taylor	30% of median	11,800	16,700	20,875	71%	57%	
	\$39,400	50% of median	19,700	16,700	20,875	118%	94%
		60% of median	23,640	16,700	20,875	142%	113%
Terrell	30% of median	10,150	16,700	20,875	61%	49%	
	\$33,400*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Terry	30% of median	10,800	16,700	20,875	65%	52%	
	\$36,000*	50% of median	18,000	16,700	20,875	108%	86%
		60% of median	21,600	16,700	20,875	129%	103%
Throckmorton	30% of median	10,150	16,700	20,875	61%	49%	
	\$27,900*	50% of median	16,950	16,700	20,875	101%	81%
		60% of median	20,340	16,700	20,875	122%	97%
Titus	30% of median	11,300	16,700	20,875	68%	54%	
	\$37,700*	50% of median	18,850	16,700	20,875	113%	90%
		60% of median	22,620	16,700	20,875	135%	108%
Tom Green	30% of median	12,150	16,700	20,875	73%	58%	
	\$40,500	50% of median	20,250	16,700	20,875	121%	97%
		60% of median	24,300	16,700	20,875	146%	116%
Travis	30% of median	16,600	16,700	20,875	99%	80%	
	\$55,400	50% of median	27,700	16,700	20,875	166%	133%
		60% of median	33,240	16,700	20,875	199%	159%
Trinity	30% of median	10,150	16,700	20,875	61%	49%	
	\$33,900*	50% of median	16,950	16,700	20,875	101%	81%

\* Denotes Median income

State MSA Median 42,300 100% Poverty Rate for Family of 4 = 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 = 20,875

## Comparison of Median Incomes Poverty Rates for Counties

COUNTY		AMFI	100% Poverty	125% Poverty	AMFI/100%	AMFI/125%
		Family of 4	Rate	Rate		
	60% of median	20,340	16,700	20,875	122%	97%
<b>Tyler</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$33,400*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Upton</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$39,600*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Uvalde</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$31,800*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Val Verde</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$26,700*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Van Zandt</b>	30% of median	10,450	16,700	20,875	63%	50%
<b>\$34,900*</b>	50% of median	17,450	16,700	20,875	104%	84%
	60% of median	20,940	16,700	20,875	125%	100%
<b>Victoria</b>	30% of median	12,850	16,700	20,875	77%	62%
<b>\$44,900*</b>	50% of median	21,400	16,700	20,875	128%	103%
	60% of median	25,680	16,700	20,875	154%	123%
<b>Walker</b>	30% of median	11,550	16,700	20,875	69%	55%
<b>\$38,500*</b>	50% of median	19,250	16,700	20,875	115%	92%
	60% of median	23,100	16,700	20,875	138%	111%
<b>Ward</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$33,100*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Washington</b>	30% of median	12,500	16,700	20,875	75%	60%
<b>\$41,600*</b>	50% of median	20,800	16,700	20,875	125%	100%
	60% of median	24,960	16,700	20,875	149%	120%
<b>Webb</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$30,200*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Wharton</b>	30% of median	11,050	16,700	20,875	66%	53%
<b>\$39,200*</b>	50% of median	18,400	16,700	20,875	110%	88%
	60% of median	22,080	16,700	20,875	132%	106%
<b>Wheeler</b>	30% of median	10,650	16,700	20,875	64%	51%
<b>\$35,500*</b>	50% of median	17,750	16,700	20,875	106%	85%
	60% of median	21,300	16,700	20,875	128%	102%
<b>Wichita</b>	30% of median	11,750	16,700	20,875	70%	56%
<b>\$39,200*</b>	50% of median	19,600	16,700	20,875	117%	94%
	60% of median	23,520	16,700	20,875	141%	113%
<b>Willbarger</b>	30% of median	10,600	16,700	20,875	63%	51%
<b>\$35,300*</b>	50% of median	17,650	16,700	20,875	106%	85%
	60% of median	21,180	16,700	20,875	127%	101%
<b>Willacy</b>	30% of median	10,150	16,700	20,875	61%	49%
<b>\$26,100*</b>	50% of median	16,950	16,700	20,875	101%	81%
	60% of median	20,340	16,700	20,875	122%	97%
<b>Williamson</b>	30% of median	16,600	16,700	20,875	99%	80%

\* Denotes Median Income

State MSA Median 42,300 100% Poverty Rate for Family of 4 = 16,700

State County Median 34,700 125% Poverty Rate for Family of 4 = 20,875

