

**NONPARTICIPATION IN PUBLIC BENEFIT PROGRAMS:
LESSONS FOR ENERGY ASSISTANCE**

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It is axiomatic among persons who design programs to deliver public benefits to the poor that the tasks of informing potential clients and securing their acceptance and participation are of major concern. As one Ohio review of a variety of energy assistance programs concluded: "almost by definition, poor and elderly persons are likely to be less able than others to cope with their situations, seek help when it is needed, or respond to programs of assistance when these are made available."¹¹

The Weld report concludes that there are two aspects to providing effective public assistance. The report states: "aid should be accessible to potential users and accepted by them if the program is to be fully effective."¹² This two-fold "accessible" and "acceptable" analysis translates into ensuring that potential recipients can be successful "both in learning about possible sources of assistance and in actually completing all procedures required to receive aid."¹³ From a program perspective, the actual *tasks* to be accomplished include certifying eligibility, gaining visibility for the program, and securing acceptance by potential clients.

A number of studies have given greater meaning to these general observations. This memo will examine one recent Pennsylvania study first and then review other state and national studies on why eligible households do and

¹¹ Edric Weld, *Energy Assistance Programs and Pricing Policies in the Fifty States to Benefit Elderly, Disabled or Low-Income Households*, prepared by Cleveland State University, Institute of Urban Studies, for Ohio Energy Credits Advisory Committee (1979).

¹² Weld, *supra*, at p. 2.15.

¹³ Id.

do not participate in a variety of public benefit programs. The purpose is to respond to why households do not participate in LIHEAP and to offer guidance on what actions poverty advocates, utility regulators and LIHEAP program administrators might take to remedy that failure.

I. REASONS FOR LIHEAP NONPARTICIPATION.

A. PENNSYLVANIA ENERGY ASSISTANCE.

The primary source of energy assistance in Pennsylvania is provided through the Low-Income Home Energy Assistance Program (LIHEAP).¹⁴¹ In Pennsylvania, the administration and disbursement of LIHEAP funds (both subsidy and crisis) is generally handled by the state Department of Public Welfare's county offices.¹⁵¹ In addition, "local agencies, non-profit organizations, and utility companies act as points of contact for consumers in need and make referrals to the county assistance offices."¹⁶¹

Hyman found that there has been a substantial increase in consumer awareness of energy assistance programs since 1981. The proportion of consumers who are aware of the existence of an energy assistance program and can name a specific program nearly doubled from 1981 (26%) to 1985 (46%).

¹⁴¹ Drew Hyman, *Consumer Budget Priorities and Utility Payment Problems in Pennsylvania*, prepared by Consumer Services Information System Project (Penn State University) for the Pennsylvania Public Utility Commission (1988).

¹⁵¹ *Id.*, at 19 - 20.

¹⁶¹ *Id.*, at 20.

The results are summarized below:

TABLE A
AWARENESS OF ENERGY ASSISTANCE IN PENNSYLVANIA

AWARENESS	1981 (%)	1985 (%)
Unaware of Energy Assistance:	47	14
Aware but could not Provide Name:	27	40
Aware and Did Provide Some Name:	26	46
N=	460	500

These Pennsylvania figures can be seen from the converse side, however. The Penn State study found that "while most consumers indicate awareness of energy assistance, in general, their knowledge is not sufficient to allow them to act. Almost half of those who say they 'know about' energy assistance cannot name a single program."¹⁷ As can be seen from the above Table, fifty-four percent are either aware of energy assistance but cannot name a specific program or are unaware of any programs in 1985.¹⁸ The Penn State report concludes:

While the level of awareness has improved

¹⁷ Id., at 22.

¹⁸ The knowledge problem is receding somewhat, however. This figure is down from 74 percent in 1981.

considerably in recent years, these findings raise questions about the uninformed majority. People who are unaware of programs or cannot name an agency which they can contact for assistance most likely do not have effective access to help when they need it.^{9\}

The Penn State report made several findings, including:

- o Consumer knowledge of the existence of energy assistance and conservation programs "is not very extensive.* * *Most consumers do not have effective knowledge about those programs which exist."^{10\}
- o It is the responsibility of the Public Utility Commission, the Pennsylvania Department of Public Welfare, and utility companies to inform payment troubled customers of their options and possible sources of assistance.
- o It is not possible, however, for state agencies or public utility companies to "require" consumers to use information nor can they force consumers to apply for assistance.
- o The low level of knowledge about the various options

^{9\} Id., at 22.

^{10\} Id., at 27 - 28.

available to consumers raises a question as to whether some consumers are being denied access to the assistance network because their knowledge is incomplete.

- o Consumer education can fill in the missing gaps in consumer knowledge and teach consumers to use the information available to them in an effective manner.

The concept of advancing "effective knowledge" on the part of consumers is one contribution the Pennsylvania research has made to developing appropriate outreach. "Effective knowledge" involves not only conveying information, but teaching consumers how to use that information as well. According to the Pennsylvania work, consumers must know how to act upon the information they are given. Despite this comprehensive treatment of consumer participation in the LIHEAP program (and company "hardship funds") in the Penn State study, the study misses some important observations found by other researchers. Other work is outlined below.

II. NEW YORK ENERGY ASSISTANCE

Most *elderly* poor in New York did not know of, and did not use, the existing energy "intervention programs" designed for their benefit.¹¹¹ Noting that

¹¹¹ A January 1978 report identified three programs that existed at that time: (1) the Special Crisis Intervention Program (SCIP) funded by the Community Services Administration and administered through the New York State Department of Social Services (aimed at elderly homeowners); (2) the Supplemental Security Income (SSI) Emergency Assistance for Adults,

"no intervention program can be effective unless it is known and used," the New York study sought to determine "the degree to which (the sample of elders studied) was aware of and utilized these programs."^{12\}

The Unseld report found that "fewer than 20% of the sample were aware of the SCIP^{13\} or weatherization programs."^{14\} On the one hand, the study explained the low SCIP participation, notwithstanding "intensive outreach and heavy media advertising," by noting the "brief time available for advertising and implementing the program." On the other hand, the study noted that "the CSA weatherization program *also* had relatively low visibility despite extensive advertising and outreach campaigns."^{15\}

In contrast to SCIP and CSA weatherization, the SSI Emergency Assistance program was "much more widely known" in New York, with nearly one-half of the sample noting awareness of the program. The report postulated that this knowledge was "probably because (the SSI-EEA program) is ongoing and participants may have utilized it for problems other than those that are

a program aimed at resolving, *inter alia*, energy emergencies for SSI recipients; and (3) the Community Services Administration Weatherization Program funded by CSA and administered by the New York State Department of State (aimed at low-income homeowners with poorly insulated homes).

^{12\} Charles Unseld, *The Impact of Rising Energy Costs on the Elderly Poor in New York State*, at 61, prepared by Welfare Research, Inc. for the New York State Energy Office (January 1978).

^{13\} SCIP was the special crisis intervention program.

^{14\} *Id.*, at 62.

^{15\} *Id.*, at 62.

energy related."^{16\}

**TABLE B
AWARENESS AND USE OF
EXISTING ENERGY CONSERVATION PROGRAMS
REPORTED BY PERCENTAGE OF POPULATION**

PROGRAM	AWARENESS	PARTICIPATION
SCIP	18.8%	5.1%
SSI-EAA	46.4%	5.8%
CSA WEATHERIZATION	17.8%	0.8%

The report expressed surprise at the "low degree of knowledge" of the energy assistance programs, "given our relatively informed and active sample, most of whom had had contacts with senior centers." It concluded that "any programs directed at this population must be accompanied by specialized, skillful advertising and outreach in order to be effective."^{17\}

The New York study went on to examine why households in the senior citizen sample did not use existing energy assistance programs. Those reasons are set forth in Table C below:

^{16\} Compare this recognition to the statements in Pennsylvania regarding how consumers must be provided "effective knowledge" about energy assistance. Moreover, compare this statement to the statements in Vermont regarding how first time users have greater problems understanding reporting requirements.

^{17\} Id., at 62.

TABLE C
RESPONDENTS' REASONS FOR NOT USING
EXISTING ENERGY ASSISTANCE PROGRAMS (BY %)^{\18\}

REASONS	SCIP	SSI-EEA	WEATHERIZATION
NOT ELIGIBLE, NOT QUALIFIED	38.1	51.6	24.2
TOO PROUD	12.7	14.6	4.8
DIDN'T KNOW HOW TO APPLY	3.2	4.4	4.8
NUISANCE	3.2	0.6	1.6
DIDN'T THINK IT APPLIED TO ME	20.6	21.5	17.7
OTHER	17.5	9.5	22.6

The New York report looked in particular at the attitudes of the elderly toward energy assistance.^{\19\} The study reported two "separate but related phenomenon" regarding the elderly: (1) substantial numbers of the elderly poor perceive themselves as ineligible for such programs; and (2) a sizable minority appear to attach a stigma to the use of any government "hand-outs." The report concludes as to the elderly:

It is quite likely that both of these attitudes derive from the fact that the elderly poor have frequently *become poor with age.* (emphasis in original). The

^{\18\} Represents percentage of these individuals who had heard about but did not use the programs (SCIP N=54; SSI-EEA N=160; Weatherization N=67).

^{\19\} Id., at 66.

newly poor have a long history of self-reliance and independence and quite often take pains to distinguish themselves from the welfare population. Programs that appear to present 'something for nothing' are difficult for many of them to accept. It appears, too, that many elderly perceive these programs as 'welfare' and thus as inappropriate for them --despite acknowledged need.^{120\}

Identifying households who have "become poor" as being populations in need of special outreach, identifying the advantages of tying energy assistance to programs addressing other needs also, and identifying media advertising as being inadequate unto itself as a means of outreach are all lessons to be learned from the New York elderly energy assistance study effort.

III. MAINE ENERGY ASSISTANCE.

The lack of telephone service by low-income households can serve as a barrier to participation in low-income energy programs, one study in Maine concluded. The state of Maine has adopted a unique approach to the winter payment problems of low-income customers. Rather than adopting a "pure" winter moratorium, whereby disconnections of service are absolutely prohibited

^{120\} Id., at 66 - 67.

for income-eligible customers from November through April, Maine has adopted a two-pronged approach to winter shutoffs. The first prong requires utilities to make a reasonable effort to make personal contact with customers who are \$50 or more in arrears.^{121\} This "personal contact" may occur either by telephone or by a premise visit.^{122\}

The second prong is a system of payment plans. The Maine public utility commission (PUC) requires most utilities^{123\} to offer eligible customers^{124\} an opportunity to enter into a Special Payment Arrangement. Under this plan, a customer may pay less than the full amount of winter bills as they become due; the difference is then "made-up" in equal increments paid during the non-heating months.^{125\} In the event that (1) no personal contact is made with the customer, or (2) personal contact is made and the customer and utility fail to agree on a payment plan, or (3) a payment plan is agreed to but is subsequently broken, a utility may seek to disconnect service even during the winter months so long as it first seeks and obtains approval from the Maine PUC's Consumer Assistance

^{121\} Chapter 81, sec. 17.D and Sec. 17.A.2, Maine P.U.C. Rules.

^{122\} Chapter 81, sec. 17.B.9, Maine P.U.C, Rules.

^{123\} Utilities with fewer than 10,000 residential customers are exempt. Chapter 81, sec. 18.O, Maine P.U.C. Rules.

^{124\} An "eligible customer" is defined to be a customer who "is not able to pay for utility service in accordance with the terms of the bill without exposing the customer or other members of the customer's household to the probability of deprivation of food or other necessities for health or life." Chapter 81, sec. 17.A.5, Maine P.U.C. Rules.

^{125\} Chapter 81, sec. 17.A.4, Maine P.U.C. Rules.

Division.^{126\}

A recent report for the Maine PUC, prepared by the National Consumer Law Center, found that these rules operated, however unintentionally, to exclude a discrete population of low-income households.^{127\} The report found that 70 percent of the households for whom a winter disconnection was sought,^{128\} and 80 percent for whom a winter disconnection was granted,^{129\} lacked **telephone** service in their home. The study found that the homes without telephones did not have greater arrears than the remaining population.^{130\}

The study found instead that the structure of the utility's collection procedures worked to exclude these households that lacked telephones. It found that a statistically significant difference existed in the number of "no-phone households" that arranged to make full or partial payments, that obtained public assistance, and that entered into payment plans.^{131\} The study concluded:

It would appear that households which lack

^{126\} Chapter 81, sec. 17.I.2, Maine P.U.C. Rules.

^{127\} National Consumer Law Center, *An Evaluation of Low-Income Utility Protections in Maine: Winter Requests for Disconnect Permission*, at 16 - 18 (July 1988).

^{128\} *Id.*, at 16.

^{129\} *Id.*, at 19.

^{130\} Indeed, exactly the opposite was found. On average, the population without phones had \$158 in arrears at the time of the original disconnect notice issued by the utility while the population as a whole had \$170 in arrears. Similarly, at the time the utility sought permission to disconnect in the winter, the average arrears for the "no-phone" population was \$189 while the average arrears for the total population was \$210. *Id.*, at 17.

^{131\} *Id.*, at 18.

telephone service do not have the same ability to undertake the basic activities necessary to maintain home heating. They cannot contact social service agencies for public assistance; nor can they contact their utility to make payment plan arrangements.^{132\}

Based upon this analysis, the Maine PUC was urged to eliminate the source of exclusion from the energy assistance programs: heavy reliance upon telephone collection techniques. However unintentional, the unconscious assumption regarding the presence of telephones was serving as a barrier to participation in low-income energy payment solutions by a substantial segment of Maine's low-income population.

IV. ELDERLY PARTICIPATION IN LIHEAP.

A recent national study by the Center on Budget and Policy Priorities examined specifically why elderly households did not participate in the LIHEAP program.^{133\} This report, too, noted the reluctance of elderly households to accept what are perceived to be public welfare payments.^{134\} However, the report noted other substantial barriers to participation, as well, including:

^{132\} Id.

^{133\} Kathryn Porter, *Participation by the Elderly in the Low Income Home Energy Assistance Program*, prepared by Center on Budget and Policy Priorities for the American Association of Retired Persons (AARP) (December 1989).

^{134\} Id., at 26.

- o Difficulties in obtaining access to the program. "In some areas, transportation to offices that accept applications may be a problem, especially for the elderly. For those who are homebound or socially isolated, getting to an office may be nearly impossible."^{135\}
- o Limitations on time periods for accepting applications. Many states have very short time periods within which to apply for LIHEAP assistance. And, with decreasing LIHEAP funds, time periods are being reduced even further. Seven states reduced the time period for applications in FY 1988. About one third of the states shortened the application period in FY 1989.^{136\}
- o A lack of program trust. A study of methods for marketing energy conservation programs to the elderly, this report noted, found that "many of the elderly did not **trust** the programs." (emphasis added).^{137\} Some seniors, the report noted, "were reluctant to accept weatherization assistance because of previous experiences with fraudulent home

^{135\} Id., at 25.

^{136\} Id., at 25.

^{137\} Id., at 26, citing, Linda Berry, et al., *Marketing and Design of Residential Conservation Programs for the Elderly*, Oak Ridge Laboratories (February 1988).

repair organizations."^{38\} The report found that in designing outreach efforts, "the specific informational techniques used were less important than the amount of trust potential participants had in the sponsoring organization."^{39\}

V. VERMONT FOOD STAMPS.

The stigma of receiving public benefits was found to be a substantial problem with Vermont Food Stamp recipients, elderly or not. According to one recent report: "the overall image of the Food Stamp program is not a positive one. Participants used the words `anger,' `hassle,' `put down,' `derogatory,' `rude,' `humiliating' and `frustrating' to describe the program."^{40\}

The application forms for the Food Stamp program in Vermont were a major barrier to participation. The participants, according to the Vermont researchers, "viewed the 12-page application form as complex and overwhelming."^{41\} The report continued:

there were several participants* * *in particular who
were very open about their lack of education (4th

^{38\} Id.

^{39\} Id., at 29 and 30.

^{40\} Sandage Advertising & Marketing, *Food Stamp Program: Focus Group Research Report*, at 6, prepared for Vermont Department of Social Welfare (1989).

^{41\} Id., at 8.

grade or less), and their inability to complete the forms without assistance. Regardless of educational level, however, the participants felt the instructions were not clear and that the wording of several questions on the application form was confusing.^{\42\}

Assistance with the application forms was generally sought from families or friends because of the perceived hostile attitude of the Department of Social Welfare (DSW) staff.

In contrast, the monthly income reporting forms were *not* major problems for most Food Stamp recipients, according to the Vermont report. However, and it is a big however, problems did exist. For example, the report found, "there were several participants who mentioned that ***the first time*** (emphasis in original) the monthly reporting form arrived in the mail, they had been confused about what was expected."^{\43\} Moreover, according to the Vermont report, "a lack of knowledge about how or where to get problems resolved had resulted in several families losing their eligibility."^{\44\}

Even households who knew where to go for problem solving were not always capable of acting upon that knowledge. According to the Vermont report, "for the Orange County participants, both the Barre and White River Junction

^{\42\} Id., at 8.

^{\43\} Id., at 7

offices were long distance toll calls, which made it a hardship to seek assistance by telephone."^{45\}

In sum, according to the Vermont research, "the major barriers to initial or continued participation" in the Food Stamp program included: (1) the hostile attitude of Department of Social Welfare (DSW) staff; (2) the complexity of the application form; and (3) the lack of assistance for questions and problems.

SECTION F: NATIONAL FOOD STAMP DATA

Why low-income households do not participate in the Food Stamp program nationwide was the subject of a U.S. General Accounting Office (GAO) study in 1988.^{46\} The GAO found an estimated participation rate of 43.8 percent in 1986, based on annual data, down slightly (but not significantly) from the roughly 46.1 percent in 1979. As GAO said, in both years, slightly more than half of all eligible households eligible for Food Stamps did not participate in that program.^{47\} "Despite substantial outlays in the Food Stamp program," GAO said, "there is concern that some households eligible for the Food Stamp program and in need of its benefits are not participating in the program."^{48\}

^{44\} Id., at 7.

^{45\} Id., at 8 - 9.

^{46\} General Accounting Office, *Food Stamps: Reasons for Nonparticipation* (December 1988).

^{47\} Id., at 13.

^{48\} Id., at 8.

The GAO found that about half (50.7 percent) of the eligible nonparticipants had misperceptions regarding their eligibility for the program.^{\49\} Of those households who thought they were ineligible, more than half (53 percent) mistakenly believed that their income or assets were too high to entitle them to receive Food Stamps (39 percent) or that some other program requirement precluded their participation (14 percent).^{\50\} An additional 25.7 percent who thought they were ineligible reported that they were not eligible because they did not need Food Stamps.

The presence of income variation contributes to this phenomenon, GAO said. If a household, in other words, applies for and is denied assistance one or more times when its income is in fact too great for the household to be eligible, the household may not **re**apply even when income decreases to the point of passing eligibility criteria. Special efforts thus must be made to reach households with income variations. Seasonal income, part-time or temporary employment and the like may represent such circumstances.

In contrast are those households who believed themselves to be eligible for Food Stamps but nevertheless did not apply. More than eight of ten (82.8 percent) nonparticipants who thought they were or might be eligible did not even **try** to get Food Stamps in 1986. Roughly one-third (30 percent) of these

^{\49\} Id., at 14 - 15.

^{\50\} Id., at 16 - 17.

households believed that they did not need Food Stamps. Another one-third reported that "perceived administrative `hassles' and physical access problems" accounted for their failure to participate in the program.^{\51\} The proportion of households who cited "administrative hassles" increased to more than 25 percent in 1986 (from less than 18 percent in 1979).

A subsequent GAO study categorized Food-Stamp-eligible but nonparticipating households into three major categories: (1) households with an expressed lack of desire for Food Stamps, either because of their perception of a lack of need or because of their personal attitude toward receiving welfare benefits; (2) households with a lack of, or incorrect, information about the Food Stamp program, including incorrect information about eligibility requirements and a lack of information about how to apply for benefits; and (3) households with perceived or actual access or program problems. These last households included households who had negative perceptions about program administration, experienced program administrative "hassles," were told they were ineligible by welfare officials, or either perceived they had, or actually had, experienced physical access problems while attempting to secure benefits.^{\52\}

GAO found that reasons for nonparticipation varied based on demographic factors. The highest probability that nonparticipation arose

^{\51\} Id., at 20 - 21.

^{\52\} General Accounting Office, *Food Stamp Program: A Demographic Analysis of Participation and Nonparticipation*, at 15 (January 1990).

because of a lack of desire for Food Stamp benefits, GAO said, came with households receiving Social Security benefits, those containing elderly eligible households, and "all groups of white households that contained currently or formerly married individuals."^{153\} The groups most likely to cite a lack of information about the Food Stamp program included most categories of households headed by single individuals.^{154\} Finally, GAO said, the groups most likely to report problems ("real or perceived") with the Food Stamp program or access problems as their major reason for nonparticipation were households that participated in SSI or other public welfare programs; households headed by nonwhite widowed, divorced or separated individuals; nonwhite single males; and households containing nonwhite married couples.^{155\}

GAO concluded that the demographic analysis was significant for policymakers. According to the GAO:

From a policy viewpoint, an informed decision on the part of an eligible household not to participate in the program is not an issue. Lack of information about the program, however, and at least some program and access problems can and should be

^{153\} Id., at 19.

^{154\} These include households headed by white single men and women and those households headed by nonwhite single females. Id., at 19.

^{155\} Id., at 19.

remedied.^{156\}

The GAO said that "since more than three fifths of the eligible households gave these reasons for nonparticipation --36.8 percent gave a lack of information, and 25.0 gave program or access problems as reasons for nonparticipation-- it is clearly important to address those problems."^{157\}

RECOMMENDATIONS

Based on the above research, the following recommendations are made:

1. **Outreach**: Public utilities should be directed to use their own accounting data processing records to identify payment-troubled customers. These customers should receive specific targeted outreach from the utilities promoting participation in the LIHEAP program.
2. **Publicity**: One goal of LIHEAP outreach should be to make the program "acceptable" to its intended clients. In addition to saying that "help is available," LIHEAP outreach should inform people why it is "okay" to seek out and accept LIHEAP benefits. Outreach should serve to legitimize the LIHEAP program in the eyes of the low-income community.
3. **Publicity**: LIHEAP outreach should be directed toward creating name recognition for the local service provider as

^{156\} Id., at 22.

^{157\} Id., at 22.

well as to explaining the program. Associating "help" with the name of the service provider is important, whether or not an exact knowledge of what the "help" would consist of is communicated.

4. **Targeting:** LIHEAP outreach encompassing all of the suggestions made in this section should be directed toward *payment-troubled* households as a specifically identified class.
5. **Education:** LIHEAP outreach must include strong elements informing households of both "what to do" **and** "how to do it." Informing households that help is available is not sufficient. Teaching consumers how to use their knowledge that programs are available is important.
6. **Outreach:** LIHEAP outreach should be tied to other programs used by the target population to the maximum extent practicable. While not being the sole outreach, outreach should emphasize that LIHEAP is simply one part of a package of benefits that is available along with other public benefits such as AFDC, Medicaid, SSI and Food Stamps.
7. **Outreach:** Outreach must be "specialized" and "targeted." Outreach directed toward the senior population must be

different than that targeted toward the AFDC population. That targeted toward the working poor must differ from that targeted toward the retired.

8. **Outreach:** LIHEAP must be targeted as something other than a government benefits program. The stigma associated with public benefits tends to prevent the elderly and other populations that have "become poor" from applying.
9. **Targeting:** One specific population to target with a special message is that population which has "become poor." The elderly, for example, may have become poor with age. There may be other "new poor," such as the unemployed, who have "become poor." These households frequently do not recognize their eligibility for LIHEAP. Moreover, the fact that these populations perceive themselves as not being the population to receive welfare benefits must be overcome.
10. **Intake and assistance:** LIHEAP intake and assistance must be available to households under circumstances reasonably calculated to reach all those eligible. Exclusive or near exclusive reliance on telephones, for example, as an intake device, as a means to schedule intake, as a

means to respond to questions, and for other measures, is inappropriate.

11. **Intake and assistance:** LIHEAP intake and assistance must be physically accessible. Special efforts must be made to reach the elderly, the homebound, the socially isolated and households otherwise lacking transportation.
12. **Outreach, intake, community relations:** LIHEAP outreach, intake and community relations should be specifically designed with a view toward establishing trust with the community sought to be reached. Outreach, intake and community relations must be culturally and educationally targeted. The elderly, the working poor, minorities, and the like may all require a different message regarding why LIHEAP is both necessary and desirable.
13. **The "trust potential":** Utilities may wish to funnel their LIHEAP outreach and community relations through specifically identified local community organizations. As one report noted: "the specific informational techniques used were less important than the amount of trust potential participants had in the sponsoring organization."
14. **Outreach, intake, education:** Specific outreach, intake and educational efforts must be directed toward first time

users. Even while LIHEAP program requirements may be accepted and easily understood by households having previously participated, first time participants may face unique misinformation or lack of information.

15. **Outreach, intake, education:** Specific outreach, intake and educational efforts must be directed toward households who have previously applied for LIHEAP and been found marginally ineligible. Research indicates that once a household has been found ineligible *once*, frequently, the household will not again *re*apply even though changed circumstances might have changed its eligibility status. Populations for whom eligibility may fluctuate should be identified and outreach and education directed to those households.
16. **Outreach and education:** Outreach, education, application forms, reporting requirements and the like must be culturally and educationally appropriate. Adult education teachers should be consulted for translating outreach and necessary forms and instructions into understandable language. Preparation of materials for non-English populations must involve not only a translation of the language, but efforts to ensure cultural proprieties as

well.