

**THE DISCRIMINATORY IMPACTS OF
CONDITIONING IOWA’S WINTER UTILITY SHUTOFF PROTECTIONS
ON THE RECEIPT OF LIHEAP**

By:

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This paper considers the equity implications of conditioning the grant of low-income utility service protections upon the customer’s application for benefits provided through the federal Low-Income Home Energy Assistance Program (LIHEAP). The analysis below will focus its attention on winter shutoff protections extended to low-income gas and electric customers in Iowa. The analysis concludes that Iowa state regulations which require a gas and/or electric customer to apply for LIHEAP before being extended winter shutoff protections has disparate adverse impacts based on ethnicity.¹ Since race is a protected class under the federal Equal Credit Opportunity Act (ECOA),² the limitation imposed on Iowa winter shutoff protections is contrary to federal law and should be invalid.³ The ECOA protections are summarized in Appendix A.

Section 476.20 of the Iowa Code provides that a low-income household shall not be subject to the disconnection of service between the dates of November 1 and April 1 of each winter heating season.⁴ The statute provides, however, that in order to be considered “low-income,” the customer must be certified to be eligible for benefits from either the

¹ A unanimous Supreme Court in 1987 interpreted the prohibition of racial discrimination under the federal Civil Rights Act to protect “identifiable classes of persons who are subjected to intentional discrimination solely because of their ancestry or ethnic characteristics.” *Saint Francis College v. Al-Khazraji*, 481 U.S. 604, 95 L.Ed. 582, 107 S.Ct. 2022 (1987). The ECOA’s prohibition of discrimination based on “race” thus would extend to Hispanic status.

² 15 U.S.C. §§ 1691 *et seq.* (2002).

³ This analysis sets aside the question of whether the Iowa requirement violates Section 2605(f)(1) of the federal statute creating LIHEAP. That statute (42 U.S.C.A. §8624(f)(1) (2002)) provides as follows: “Notwithstanding any other provision of law unless enacted in express limitation of this paragraph, the amount of any home energy assistance payments or allowances provided directly to, or indirectly for the benefit of, an eligible house-hold under this title shall not be considered income or resources of such household (or any member thereof) for any purpose under any Federal or State law, including any law relating to taxation, food stamps, public assistance, or welfare programs.”

⁴ The Iowa Utilities Board has incorporated this winter shutoff moratorium into its administrative rules. 199 IAC §19.4(17) and 199 IAC § 20.4(17).

federal Low-Income Home Energy Assistance Program (LIHEAP) or the federal Weatherization Assistance Program (WAP).⁵ LIHEAP provides cash fuel assistance, while WAP provides energy efficiency assistance.

THE POLICY CONTEXT OF IOWA'S WINTER MORATORIUM

Iowa's winter moratorium serves multiple functions. First and foremost, it prevents the termination of essential utility service during cold weather months. The winter termination of heating service, as well as the termination of the electric service that is essential for many heating systems to operate,⁶ represents a life-threatening circumstance to low-income Iowa residents.

It is not the mere termination of utility service, however, that poses health and safety threats. The Iowa Department of Human Rights, which administers the LIHEAP program in Iowa, has documented the extraordinary steps that low-income Iowa residents take in order to pay their utility bills and avoid the termination of service. One DHR survey of the impacts of home energy bills in the 1999/2000 winter heating season, for example, documented that winter energy needs far transcend bill payment troubles. The Iowa survey found that:

- Over 12 percent of the surveyed LIHEAP recipients went without food to pay their home heating bill. Projected to Iowa's total LIHEAP recipient population, that meant that about 7,600 low-income households (representing 20,000 Iowa citizens) went without food at times as a result of unaffordable home heating bills.
- More than one-in-five went without medical care to pay for heating bills. This included not seeking medical assistance when it was needed, not filling prescriptions for medicine when a doctor had prescribed it, and/or not taking prescription medicines in the dosage ordered by the doctor;
- Almost 30 percent reported that they did not pay other bills, but did not elaborate as to which bills went unpaid. In addition to not paying other bills, many low-income households incurred debt in order to pay both their home heating bills and other basic necessities: borrowed from friends and/or neighbors; used credit cards to pay for food and other necessities, or did not pay the heating bill.

Disproportionately excluding a discrete population of Iowa residents from the protections offered by the Iowa winter utility shutoff moratorium unfairly places these households at

⁵ Iowa Code §476.20 (2002).

⁶ Even many non-electric heating sources require heat to run the heat distribution system within a home. The termination of electric service, therefore, would result in a lack of heat as much as the termination of the primary heating service would.

greater risk not merely of losing their service, but of the harms that they must subject themselves to in order to prevent that loss of service.

DOCUMENTING DISCRIMINATORY IMPACTS

Pre-conditioning the extension of Iowa’s winter shutoff moratorium on the receipt of fuel assistance through the federal LIHEAP program has the effect of disproportionately denying winter health and safety protections to Iowa’s Hispanic community. The conclusion that discrimination is present in this regard is determined based upon application of an “effects test.”

The primary attribute of an effects test is that the results of a practice urged to be discriminatory can be separated from the intention held by the defending party. The “effects test” relies not upon any improper intention by the challenged party, but rather upon the measurement of disparate impacts. The good or bad faith of the defendant, in other words, is irrelevant to any showing that a challenged practice does or does not discriminate against a protected class. The focus, instead, is on discriminatory results. The effects test is used to challenge a practice of the defendant that results in discriminatory impacts on identifiable classes.

Two commonly accepted approaches can be used to determine whether the winter moratorium requirements generate a discriminatory impact.

- The first test inquires whether a requirement that a certain attribute *be present* generates a discriminatory impact. This approach has been used to determine the discriminatory impacts of certain employment practices. In the seminal case *U.S. v. Georgia Power Company*,⁷ for example, the courts held that a litigant can successfully challenge an employment practice if he or she can prove that minorities as a class are excluded by a requirement that a certain attribute *be present*. In *Georgia Power*, the company’s requirement that all employees have a high school diploma was successfully challenged. “The requirement undoubtedly screens out blacks at a considerably higher rate than whites,” the court said.⁸
- The second test inquires whether a requirement that a certain attribute *be absent* generates a discriminatory impact. In the seminal case *Johnson v. Pike Corporation of America*,⁹ a company rule dismissing employees who had their wages garnished was struck down. The court observed that the proportion of racial minorities among the group of people who have had their wages

⁷ 474 F.2d 906 (5th Circ. 1973).

⁸ *Id.*, at 918.

⁹ 332 F Supp. 490, 492 - 497 (C.D. Cal. 1971).

garnished is significantly higher than the proportion of racial minorities in the general population.

The applicability of the first of these two tests to Iowa's winter moratorium requirement is evident. Reformulation of the *Georgia Power* test results in the following inquiry:

Does the requirement that, in order for a customer to gain the protection of the Iowa winter utility shutoff moratorium, that customer must also be certified as LIHEAP-eligible, disproportionately screen out Hispanics from the receipt of winter shutoff protections?

The data documents a pattern of systematic exclusion by this winter moratorium requirement.

ANALYSIS OF THE DATA

Two sources of data were used to determine whether requiring customers seeking winter utility shutoff protections to also be recipients of federal LIHEAP assistance has a disproportionate adverse impact on Hispanics in Iowa. First, ethnicity data on LIHEAP participants was obtained from the Iowa Department of Human Rights for the 2001 and 2002 program years.¹⁰ A Hispanic penetration rate was calculated for each Community Action Agency (CAA) delivering LIHEAP benefits. In Iowa, while DHR administers the LIHEAP program, CAAs are the sub-grantees through which the LIHEAP benefits are distributed.

The rate of Hispanic participation in the Iowa LIHEAP program was then compared to two different figures: (1) the proportion of Hispanics in the total population; and (2) the proportion of Hispanics in the population with income below 100% of the Federal Poverty Level. County population figures were aggregated into figures that could be compared to the CAA LIHEAP data.¹¹

To prevent the possible over-representation of Hispanics in one CAA service territory from masking the under-representation of Hispanics in a different CAA service territory, each CAA was evaluated to determine whether Hispanic participants reflected the proportion of Hispanics in the overall population, as well as the below-Poverty population, for that service territory.

¹⁰ The 2001 program year ran from October 2000 through September 2001. The 2002 program year ran from October 2001 through September 2002. Program Year 2002 data was available through June 2002. Given that the LIHEAP application period closes by this time, nearly all PY2002 LIHEAP participants are thus included in this data.

¹¹ Each county was assigned to a Community Action Agency. The breakdown of CAA service territories was provided by DHR. The county-specific data was then aggregated and attributed to the respective CAA.

Hispanics were substantially under-represented in both populations of Iowa residents. When compared to the proportion of Hispanics in the total population, Hispanics were under-represented in 13 of the 18 Iowa CAA service territories in Program Year (PY) 2002 and in 12 of the 18 CAA service territories in Program Year (PY) 2001 (Table 1). When compared to the proportion of Hispanics in the population of persons with income below 100% of the Federal Poverty Level, Hispanics were under-represented in all 18 CAA service territories in both years (Table 2).

In some service territories, the extent of the under-representation was substantial:

- In the City of Des Moines (PY2001), while 13.7% of all persons below 100% of the Federal Poverty Level were Hispanic, only 4.7% of all LIHEAP participants were Hispanic, an under-representation of nearly 300%. In PY 2002, the figures were 13.7% and 4.4% respectively.
- In Woodbury County, while 17.2% of all persons below 100% of the Federal Poverty Level were Hispanic (PY2001), only 7.2% of the LIHEAP participants were, an under-representation of 240%. In PY2002, the figures were 17.2% and 6.4% respectively.
- In Upper Des Moines Opportunity (UDMO) (PY2001), while 8.7% of all persons below 100% of the Federal Poverty Level were Hispanic, only 3.2% of LIHEAP recipients were, an under-representation of more than 270%. In PY2002, the respective figures were 8.7% and 2.9%.

Of the total 75,357 LIHEAP recipients served in Iowa in Program Year 2002, more than 4,000 additional recipient households would needed to have been Hispanic (with a constant participation rate) in order for Hispanics to reach a level reflecting their incidence in the Iowa below-Poverty population (Table 3), an increased Hispanic statewide participation rate of 230%. In PY2001, more than 4,400 additional Hispanic LIHEAP households would have been needed, an increased statewide participation rate of 215%.

SUMMARY AND CONCLUSIONS

Iowa disproportionately denies the protections of its winter utility shutoff moratorium to its Hispanic residents. While not doing so overtly, or directly, the requirement that the winter utility shutoff moratorium extends only to households that have been certified as eligible for LIHEAP has the *effect* of excluding Hispanics at a rate that is much higher than is merited by their presence in the Iowa population. Given federal prohibitions on discrimination in the granting of credit, including utility credit, it would appear that Iowa's limitations on its winter moratorium would be subject to successful challenge.

APPENDIX A

CONSUMER PROTECTIONS OFFERED PURSUANT TO THE EQUAL CREDIT OPPORTUNITY ACT (ECOA)

The federal Equal Credit Opportunity Act (ECOA) prohibits the discrimination against a credit applicant at any stage of a credit transaction on a prohibited basis. Several definitions are important at this point:

- “Creditor” is defined to include “any person who regularly extends, renews, or continues credit, any person who regularly arranges for the extension, renewal or continuation of credit; or any assignee of an original creditor who participates in the decision to extend, renew or continue credit.”¹²
- “Credit” is defined by the ECOA as “the right granted by a credit to a debtor to defer payment of debt or to incur debts and defer its payment or to purchase property or services and defer payment therefor.”¹³
- “Discrimination” is defined by the ECOA to mean “to treat an applicant less favorably than other applicant.”¹⁴
- The prohibited bases specified by the ECOA include race, color, religion, national origin, sex, marital status, age, and income based in whole or part on a public assistance program.¹⁵

The ECOA prohibits discrimination in all stages of the credit transaction.¹⁶ The implementing regulations define “credit transaction” as including:

Every aspect of dealings with a creditor regarding an application for, or an existing extension of credit including, but not limited to, information requirements; investigation procedures; standards of creditworthiness; terms of credit; furnishing of credit information; revocation, alteration, or termination of credit, and collection procedures.¹⁷

¹² 15 USC §1691(a)(e) (2002). Regulation B, implementing the ECOA, defines “creditor” to mean “a person who, in the ordinary course of business, regularly participates in the decision of whether or not to extend credit. . .” 12 CFR § 202.2(1) (2002).

¹³ 15 U.S.C. §169a(d) (2002).

¹⁴ 12 C.F.R. §202.2(n) (2002).

¹⁵ 15 U.S.C. §1691(a) (2002). Another prohibited basis is the good faith exercise of rights under the federal consumer credit statutes.

¹⁶ 15 U.S.C. §1691(a) (2002); *see*, 12 C.F.R. §202.4 (2002).

¹⁷ 12 C.F.R. §202.2(m) (2002).

The Official Staff Commentary accompanying the implementing regulations for the ECOA make clear that the rule “covers all dealings, without exception, between an applicant and a creditor, whether or not addressed by other provisions of the regulation.”¹⁸

While the ECOA provides a limited exception to public utilities¹⁹ from certain of its requirements,²⁰ there is no question but that the ECOA applies to public utility transactions generally.²¹

¹⁸ Official Staff Commentary, 12 C.F.R. §202.4-1 (2002).

¹⁹ 12 CFR §202.2(a) (2002).

²⁰ Utilities are exempted from three requirements: (1) certain requirements regarding the treatment of information about marital status; 12 CFR §202.5(bb)(1) (2002); (2) certain requirements regarding furnishing credit information (12 CFR §202.10) (2002); and (3) certain requirements regarding record retention (12 CFR §202.12(b) (2002).

²¹ Official Staff Commentary, 12 C.F.R. §202.3-a (2002); *see generally*, Donoghue, “The Equal Credit Opportunity act and Public Utilities,” 105 *Public Utilities Fortnightly* 28 (June 5, 1980).

Table 1 (page 1 of 2)
Incidence of Hispanics in Total Population Compared to Incidence of Hispanics in LIHEAP Population
Iowa: 2002 Program Year

	LIHEAP Participants			Total Persons			Agencies in which Hispanics are Underrepresented
	Total	Hispanic		Total Persons	Hispanic		
		Number	Percent		Number	Percent	
Community Action Agency							
Community Opportunities	3,231	59	1.8%	112,670	2,850	2.5%	Yes
Hawkeye Area CAP	5,305	96	1.8%	379,652	6,588	1.7%	No
Iowa East Central Train	6,560	343	5.2%	264,654	12,216	4.6%	No
Matura Action Corporation	2,020	12	0.6%	51,187	592	1.2%	Yes
Mid-Iowa Community Action	3,466	166	4.8%	173,084	6,121	3.5%	No
Mid-Sioux Opportunity	2,183	35	1.6%	88,623	1,339	1.5%	No
North Iowa Community Action Organization	4,281	92	2.1%	148,103	3,108	2.1%	No
Northeast Iowa Area CAA	4,017	24	0.6%	122,306	1,429	1.2%	Yes
Operation New View	3,946	27	0.7%	127,016	1,307	1.0%	Yes
Operation Threshold	4,635	61	1.3%	159,390	2,562	1.6%	Yes
Red Rock Community Action	3,991	36	0.9%	309,443	4,643	1.5%	Yes
South Central Iowa CAP	2,362	9	0.4%	41,695	687	1.6%	Yes
Southeast Iowa Community Action	4,148	101	2.4%	111,636	3,435	3.1%	Yes
Southern Iowa Economic Development Ass'n	4,558	32	0.7%	115,176	1,603	1.4%	Yes
Upper Des Moines Opportunity	5,778	167	2.9%	186,075	5,870	3.2%	Yes
West Central Development Corp.	6,160	75	1.2%	207,777	5,517	2.7%	Yes
Woodbury Community Action	2,786	177	6.4%	101,807	9,468	9.3%	Yes
Des Moines Dept of Comm. Development	5,930	260	4.4%	194,252	13,138	6.8%	Yes
Total							13

Table 1 (page 2 of 2)
Incidence of Hispanics in Total Population Compared to Incidence of Hispanics in LIHEAP Population
Iowa: 2001 Program Year

	LIHEAP Participants			Total Persons			Agencies in which Hispanics Underrepresented
	Total	Hispanic		Total Persons	Hispanic		
		Number	Percent		Number	Percent	
Community Action Agency							
Community Opportunities	3,776	67	1.8%	112,670	2,850	2.5%	Yes
Hawkeye Area CAP	5,827	118	2.0%	379,652	6,588	1.7%	No
Iowa East Central Train	7,374	405	5.5%	264,654	12,216	4.6%	No
Matura Action Corporation	2,284	18	0.8%	51,187	592	1.2%	Yes
Mid-Iowa Community Action	3,789	162	4.3%	173,084	6,121	3.5%	No
Mid-Sioux Opportunity	2,475	62	2.5%	88,623	1,339	1.5%	No
North Iowa Community Action Organization	4,817	104	2.2%	148,103	3,108	2.1%	No
Northeast Iowa Area CAA	4,381	25	0.6%	122,306	1,429	1.2%	Yes
Operation New View	4,326	26	0.6%	127,016	1,307	1.0%	Yes
Operation Threshold	5,359	72	1.3%	159,390	2,562	1.6%	Yes
Red Rock Community Action	4,316	44	1.0%	309,443	4,643	1.5%	Yes
South Central Iowa CAP	2,644	18	0.7%	41,695	687	1.6%	Yes
Southeast Iowa Community Action	4,630	120	2.6%	111,636	3,435	3.1%	Yes
Southern Iowa Economic Development Ass'n	4,898	42	0.9%	115,176	1,603	1.4%	Yes
Upper Des Moines Opportunity	6,495	207	3.2%	186,075	5,870	3.2%	No
West Central Development Corp.	6,711	59	0.9%	207,777	5,517	2.7%	Yes
Woodbury Community Action	3,049	219	7.2%	101,807	9,468	9.3%	Yes
Des Moines Dept of Comm. Development	6,559	306	4.7%	194,252	13,138	6.8%	Yes
Total							12

Table 2 (page 1 of 2)
Incidence of Hispanics in Below Poverty Population
Compared to Incidence of Hispanics in LIHEAP Population
Iowa : 2002 Program Year

	LIHEAP Participants			Persons Below Poverty			Agencies in which Hispanics are Underrepresented
	Total	Hispanic		Total Persons	Hispanic		
		Number	Percent		Number	Percent	
Community Action Agency							
Community Opportunities	3,231	59	1.8%	7,982	556	7.0%	Yes
Hawkeye Area CAP	5,305	96	1.8%	32,963	1,144	3.5%	Yes
Iowa East Central Train	6,560	343	5.2%	8,195	2,410	29.4%	Yes
Matura Action Corporation	2,020	12	0.6%	4,896	55	1.1%	Yes
Mid-Iowa Community Action	3,466	166	4.8%	18,791	1,340	7.1%	Yes
Mid-Sioux Opportunity	2,183	35	1.6%	5,735	243	4.2%	Yes
North Iowa Community Action Organization	4,281	92	2.1%	12,594	613	4.9%	Yes
Northeast Iowa Area CAA	4,017	24	0.6%	9,815	209	2.1%	Yes
Operation New View	3,946	27	0.7%	10,123	218	2.2%	Yes
Operation Threshold	4,635	61	1.3%	18,556	546	2.9%	Yes
Red Rock Community Action	3,991	36	0.9%	15,702	658	4.2%	Yes
South Central Iowa CAP	2,362	9	0.4%	4,880	79	1.6%	Yes
Southeast Iowa Community Action	4,148	101	2.4%	10,719	502	4.7%	Yes
Southern Iowa Economic Development Ass'n	4,558	32	0.7%	13,511	414	3.1%	Yes
Upper Des Moines Opportunity	5,778	167	2.9%	15,164	1,315	8.7%	Yes
West Central Development Corp.	6,160	75	1.2%	18,298	795	4.3%	Yes
Woodbury Community Action	2,786	177	6.4%	10,434	1,794	17.2%	Yes
Des Moines Dept of Comm. Development	5,930	260	4.4%	21,877	2,991	13.7%	Yes
Total							18

Table 2 (page 2 of 2)
Incidence of Hispanics in Below Poverty Population
Compared to Incidence of Hispanics in LIHEAP Population
Iowa: 2001 Program Year

	LIHEAP Participants			Persons Below Poverty			Agencies in which Hispanic Underrepresented
	Total	Hispanic		Total Persons	Hispanic		
		Number	Percent		Number	Percent	
Community Action Agency							
Community Opportunities	3,776	67	1.8%	7,982	556	7.0%	Yes
Hawkeye Area CAP	5,827	118	2.0%	32,963	1,144	3.5%	Yes
Iowa East Central Train	7,374	405	5.5%	8,195	2,410	29.4%	Yes
Matura Action Corporation	2,284	18	0.8%	4,896	55	1.1%	Yes
Mid-Iowa Community Action	3,789	162	4.3%	18,791	1,340	7.1%	Yes
Mid-Sioux Opportunity	2,475	62	2.5%	5,735	243	4.2%	Yes
North Iowa Community Action Organization	4,817	104	2.2%	12,594	613	4.9%	Yes
Northeast Iowa Area CAA	4,381	25	0.6%	9,815	209	2.1%	Yes
Operation New View	4,326	26	0.6%	10,123	218	2.2%	Yes
Operation Threshold	5,359	72	1.3%	18,556	546	2.9%	Yes
Red Rock Community Action	4,316	44	1.0%	15,702	658	4.2%	Yes
South Central Iowa CAP	2,644	18	0.7%	4,880	79	1.6%	Yes
Southeast Iowa Community Action	4,630	120	2.6%	10,719	502	4.7%	Yes
Southern Iowa Economic Development Ass'n	4,898	42	0.9%	13,511	414	3.1%	Yes
Upper Des Moines Opportunity	6,495	207	3.2%	15,164	1,315	8.7%	Yes
West Central Development Corp.	6,711	59	0.9%	18,298	795	4.3%	Yes
Woodbury Community Action	3,049	219	7.2%	10,434	1,794	17.2%	Yes
Des Moines Dept of Comm. Development	6,559	306	4.7%	21,877	2,991	13.7%	Yes
Total							18

Table 3 (page 1 of 2)
Necessary Increase in Hispanic LIHEAP Participation Rate for
LIHEAP Hispanic Participants to Reflect Incidence of Hispanics in Below-Poverty Population
Iowa LIHEAP: 2002 Program Year

	LIHEAP Participants			Hispanic LIHEAP Participants		
	Total	Hispanic		Pct if at Pct Below Poverty	No. if at Percentage Below Poverty	Needed Additional Participants
		Number	Percent			
Community Action Agency						
Community Opportunities	3,231	59	1.8%	7.0%	225	166
Hawkeye Area CAP	5,305	96	1.8%	3.5%	184	88
Iowa East Central Train	6,560	343	5.8%	29.4%	1,929	1,586
Matura Action Corporation	2,020	12	0.6%	1.1%	23	11
Mid-Iowa Community Action	3,466	166	4.8%	7.1%	247	81
Mid-Sioux Opportunity	2,183	35	1.6%	4.2%	92	57
North Iowa Community Action Organization	4,281	92	2.1%	4.9%	208	116
Northeast Iowa Area CAA	4,017	24	0.6%	2.1%	86	62
Operation New View	3,946	27	0.7%	2.2%	85	58
Operation Threshold	4,635	61	1.3%	2.9%	136	75
Red Rock Community Action	3,991	36	0.9%	4.2%	167	131
South Central Iowa CAP	2,362	9	0.4%	1.6%	38	29
Southeast Iowa Community Action	4,148	101	2.4%	4.7%	194	93
Southern Iowa Economic Development Ass'n	4,558	32	0.7%	3.1%	140	108
Upper Des Moines Opportunity	5,778	167	2.9%	8.7%	501	334
West Central Development Corp.	6,160	75	1.2%	4.3%	268	193
Woodbury Community Action	2,786	177	6.4%	17.2%	479	302
Des Moines Dept of Comm. Development	5,930	260	4.4%	13.7%	811	551
Total	75,357				5,814	4,042

Table 3 (page 2 of 2)
Necessary Increase in Hispanic LIHEAP Participation Rate for
LIHEAP Hispanic Participants to Reflect Incidence of Hispanics in Below-Poverty Population
Iowa LIHEAP: 2001 Program Year

	LIHEAP Participants			Hispanic LIHEAP Participants		
	Total	Hispanic		Pct if at Pct Below Poverty	No. if at Percentage Below Poverty	Needed Additional Participants
		Number	Percent			
Community Action Agency						
Community Opportunities	3,776	67	1.8%	7.0%	263	196
Hawkeye Area CAP	5,827	118	2.0%	3.5%	202	84
Iowa East Central Train	7,374	405	5.5%	29.4%	2,169	1,764
Matura Action Corporation	2,284	18	0.8%	1.1%	26	8
Mid-Iowa Community Action	3,789	162	4.3%	7.1%	270	108
Mid-Sioux Opportunity	2,475	62	2.5%	4.2%	105	43
North Iowa Community Action Organization	4,817	104	2.2%	4.9%	234	130
Northeast Iowa Area CAA	4,381	25	0.6%	2.1%	93	68
Operation New View	4,326	26	0.6%	2.2%	93	67
Operation Threshold	5,359	72	1.3%	2.9%	158	86
Red Rock Community Action	4,316	44	1.0%	4.2%	181	137
South Central Iowa CAP	2,644	18	0.7%	1.6%	43	25
Southeast Iowa Community Action	4,630	120	2.6%	4.7%	217	97
Southern Iowa Economic Development Ass'n	4,898	42	0.9%	3.1%	150	108
Upper Des Moines Opportunity	6,495	207	3.2%	8.7%	563	356
West Central Development Corp.	6,711	59	0.9%	4.3%	292	233
Woodbury Community Action	3,049	219	7.2%	17.2%	524	305
Des Moines Dept of Comm. Development	6,559	306	4.7%	13.7%	897	591
Total	83,710				6,480	4,406