



Louisiana Housing
Corporation

Low Income Home Energy Assistance Program

LOUISIANA LIHEAP SERVICE DELIVERY GUIDE

For Administrators and Program Staff

Effective: April 1, 2026

Table of Contents

<u>CHAPTER 1: INTRODUCTION</u>	6
1.1 Program Overview	6
1.2 LIHEAP Policy and Procedure	6
1.3 Administrative and Programmatic Changes/Updates to the LIHEAP Service Delivery Guide	7
1.4 Subgrantee Technical Assistance	7
1.5 Funding Allocations.....	7
1.6 LIHEAP Energy Software (LES) System	8
<u>CHAPTER 2: ADMINISTRATIVE OPERATIONS</u>	9
2.1 Financial Management	9
2.2 Accounting Systems	9
2.3 Administrative Policies	10
2.4 LIHEAP Contractual Documents	10
2.5 Subgrantee Production Benchmarks.....	11
2.6 Reporting Requirements	11
2.7 Recordkeeping	13
2.8 Inventory Control.....	19
<u>CHAPTER 3: SERVICE DELIVERY AND ELIGIBILITY DETERMINATION</u>	21
SERVICE DELIVERY	
3.1 Customer Service	21
3.2 Outreach.....	22
3.3 The Application Process	24
3.4 Applicant Appeals and Grievances.....	28

3.5 Applications by Employees and their Relatives 31

ELIGIBILITY DETERMINATION

3.6 Eligibility..... 33

CHAPTER 4: HEATING/COOLING ASSISTANCE 43

4.1 Determining the Monthly Total Energy Cost (TEC) for Heating/Cooling Assistance 43

4.2 Determining the Energy Assistance Benefit for Heating/Cooling Assistance 48

4.3 Delivery of Benefit for Heating/Cooling Assistance..... 49

CHAPTER 5: CRISIS ASSISTANCE 50

5.1 Crisis Bill Payment Assistance 50

5.2 Crisis Equipment Repair / Replacement Assistance..... 53

5.3 Disaster Relief Benefits (In-Kind Benefits)..... 54

5.4 Unforeseen Circumstances 55

CHAPTER 6: CLIENT EDUCATION (ASSURANCE 16) 56

6.1 Client Education Policy 56

6.2 Client Education Activities 56

6.3 Client Education Pilot Programs..... 58

CHAPTER 7: SUBGRANTEE FINANCIAL MANAGEMENT/INVOICE PROCEDURES..... 59

7.1 LIHEAP Cost Regulations 59

7.2 Cost Allocation Plan..... 60

7.3 Direct and Indirect Costs..... 60

7.4 Administrative Costs 61

7.5 Program Support Costs..... 62

7.6 Client Education (Assurance 16) Costs	63
7.7 Source Documentation.....	64
7.8 Invoice and Submission Requirements	65
7.9 Reimbursement Requirements for Ineligible Expenses	67
7.10 Budget Revision Provisions.....	67
7.11 Equipment Purchases	67
7.12 Advances	69
7.13 Subgrantee Refund Procedures for Returned Benefits for Closed Accounts	70
<u>CHAPTER 8: SUBGRANTEE COMPLIANCE MONITORING</u>	71
8.1 Grantee Requirements.....	71
8.2 Subgrantee Items to be reviewed.....	71
8.3 Selection of Files	73
8.4 Performance Indicators	73
8.5 Non-Compliance with Requirements	73
8.6 Enforcement Action.....	74
<u>CHAPTER 9: FRAUD, WASTE, AND ABUSE PREVENTION</u>	76
9.1 Subgrantee Responsibilities	76
9.2 Employee Responsibilities	77
9.3 Management Responsibilities	77
9.4 Investigation and Prosecution	78
9.5 Future Eligibility.....	79

APPENDICES: LIHEAP FORMS

- A. Assurance 16 (Client Education) Annual Proposal
 - B. Format for LIHEAP Applicant Files
 - C. Sample Appeal Decision Letter
 - D. LIHEAP Application Required Documents Form
 - E. Income Inclusions and Exclusions Chart
 - F. Verification of Employment (VOE)
 - G. Self-Employment Self Certification Form
 - H. Income Determination Worksheet
 - I. Zero Income Statement Form
 - J. Zero Income Supplemental Sheet
 - K. Statement of Contributions
 - L. LIHEAP Landlord Verification Form for Utilities Included in Rent
 - M. Prepaid Utility Calculation Worksheet
 - N. LIHEAP Crisis Assistance Form
 - O. LIHEAP Assurance 16 (Client Assistance) Household Tracking Report
 - P. LIHEAP Vendor (Client Assistance) Refund Report
 - Q. Suspected Fraud Incident Report Form
 - R. Witness Narrative Report Form
-

CHAPTER 1: INTRODUCTION

1.1 Program Overview

Federal Authorization

The Low Income Home Energy Assistance Program (LIHEAP) was authorized by the Low-Income Home Energy Act of 1981 (Title XXVI of the Omnibus Budget Reconciliation Act of 1981, Public Law 97-35, as amended). As stated in Sec. 2602 (a) the program is designed to help low-income households pay their heating and cooling bills as well as increase their energy self-sufficiency. LIHEAP is funded through a grant from the U.S. Department of Health and Human Services (DHHS).

The program targets people with the lowest incomes and the highest energy costs based on their income and family size. Additional targets are low-income households that include the elderly, persons with disabilities, and young children.

Payments are made to the energy suppliers directly by the Louisiana Housing Corporation on behalf of eligible households. LIHEAP also intervenes during a crisis situation which may include unforeseen circumstances such as public health emergencies etc. As well as provides heating and cooling equipment or repairs or in kind benefits associated with disaster relief.

The Low Income Home Energy Assistance Program (LIHEAP) is administered by the Louisiana Housing Corporation (LHC). LHC contracts with non-profit agencies and local governments to deliver LIHEAP services to low-income households throughout the State.

1.2 LIHEAP Policy and Procedure

LHC shall review Subgrantees' policy and procedure manuals to ensure that they are updated, accurate, and in compliance with DHHS regulations and guidelines. A copy of this Service Delivery Guide is provided to all Subgrantees. In addition, Subgrantees are required to acknowledge receipt of and adhere to the provisions of this Service Delivery Guide to ensure compliance with all federal regulations as well as all applicable Louisiana statutes. The Subgrantee must provide copies of the policy and procedure manual to all intake workers, who shall be instructed to read and become familiar with the provisions contained in the manual. LHC will review Subgrantees' copy of the Service Delivery Guide, during monitoring visits, to ensure the guides are updated, accurate, and complies with DHHS regulations and guidelines.

LHC must approve any changes that a Subgrantee proposes for use that are outside of LHC guidance. LHC expects all Subgrantees to abide by the guidance set forth at the State/Grantee level. Subgrantee policies, procedures, and forms are expected to mirror the Louisiana LIHEAP Service Delivery Guide, Louisiana Annual Model Plan, and

Subgrantee Agreement, unless LHC has allowed some flexibility for Subgrantee procedures as stated in these documents (i.e. Intake Procedures, Grievance Procedures, etc.). LIHEAP policies that allow flexibility at a Subgrantee level may not be more stringent or more relaxed than the requirements that LHC has provided.

1.3 Administrative and Programmatic Changes/Updates to the LIHEAP Service Delivery Guide

Provisions in this service delivery guide are subject to change at any time, depending on revisions to federal, state and LHC requirements.

When changes occur to the written policy, LHC will provide each Subgrantee with either LIHEAP Notices, Memorandums, and/or with replacement page(s) to the Guide. Any policy updates will supersede previously issued policy. Subgrantee must insert the replacement page(s) in all copies of the LIHEAP Service Delivery Guide and ensure all intake workers are made aware of the changes that impact their jobs.

1.4 Subgrantee Technical Assistance

LHC staff will provide technical assistance, as needed. In addition, LHC will also provide training to the Subgrantees at least once annually. Training may be in the form of any of the following: on-site at LHC, webinar, one-on-one screen share sessions, or conference.

1.5 Funding Allocations

Funds are distributed by allocation factors derived from the most recent census data for each parish. Households are eligible under federal standards. Income cannot exceed 150 percent of the poverty level or 60% of the state median income. LHC reviews the eligibility criteria annually to determine which income requirement serves the most eligible households. Refer to **Section 3.6** for income eligibility guidelines. The law requires benefits to be targeted to households with the highest energy costs in relation to energy burden.

To receive LIHEAP funding, LHC develops and submits a Model Plan to the U.S. Department of Health and Human Services (DHHS) annually. As part of the Plan, the State is required to hold a public hearing to solicit comments on the proposed use and distribution of the funds. The proposed Model Plan is posted at www.lhc.la.gov for review and comments prior to the public hearing.

The FINAL Model Plan will be posted to LHC's website upon DHHS approval.

The LIHEAP service delivery is comprised of the following components:

- **Heating Assistance**: The non-crisis component helps eligible low-income households pay heating costs.

- **Cooling Assistance**: The non-crisis component helps eligible low-income households pay cooling costs.
- **Crisis Assistance**: The crisis component provides assistance to eligible low-income households whose social or economic hardships are compounded by a home heating or cooling energy crisis. In a non-life threatening situation, some form of assistance will be provided to resolve the energy crisis no later than 48 hours after application. When a life threatening situation exists, some form of assistance will be provided no later than 18 hours after application. This may also include disaster relief, heating or cooling equipment replacement or repair, or pandemic response.
- **Weatherization Assistance**: The weatherization component provides energy conservation and weatherization measures to help low-income households reduce their energy costs.

1.6 LIHEAP Energy Software System

The LIHEAP Energy Software (LES) is a web-based software system selected by LHC to manage real-time program data for LIHEAP and WAP. All data related to service delivery of LIHEAP funds, including but not limited to customer application information, budget tracking reports, vendor payment reports and the generation of requests for payment should be entered into the LES system and then submitted to LHC for processing.

CHAPTER 2: ADMINISTRATIVE OPERATIONS

This section provides guidance on establishing sound administrative practices that are in compliance with all applicable federal and state requirements.

2.1 Financial Management

Subgrantees must adhere to the Office of Management and Budget (OMB) regulations:

- Title 2 CFR Part 200, Part 215, Part 225, Part 230, Part 300

For copies of the OMB Circulars, please visit the website:
<http://www.whitehouse.gov/omb/circulars/>

2.2 Accounting Systems

Subgrantees are responsible for maintaining LIHEAP revenues and expenses in an accounting system, according to generally accepted accounting principles (GAAP), which documents all expenditures in the appropriate budget categories. The system must:

- Provide accurate, current, and complete disclosure of all financial transactions;
- Separate and identify sources of federal funding;
- Maintain effective control over all funds, property, and other assets;
- Produce comparison of actual expenditures with the budget approved in the grant agreement;
- Determine the reasonable, allowable and allocated costs in accordance with applicable federal and state cost principles;
- Support accounting records with source documentation (e.g., contract documents, receipts, cancelled checks, etc.); and
- Assure timely resolution of audit findings and other recommendations.

2.3 Administrative Policies

For the purpose of LIHEAP, administrative policies are those that document compliance with contract provisions, and state and federal regulations.

Administrative policies may be monitored by LHC personnel annually during the program review. The documentation reviewed for compliance may include the following provisions and regulations:

- Compliance with non-discrimination in service delivery
- Compliance with Equal Employment Opportunity (EEO)
- Compliance with minimum wage law and affirmative action plan
- Compliance with Limited English Proficiency (LEP) plan
- Compliance with confidentiality policy
- Compliance with prohibition of funds for political support
- Compliance with audit policy and provisions
- Compliance with financial management practices
- Compliance with records retention policies
- Compliance with conflict of interest policy
- Maintenance of required insurances

All Subgrantees shall have a copy of their policy and procedure manual(s) available for review.

2.4 LIHEAP Contractual Documents

Subgrantees must submit the following documentation with each executed Low Income Home Energy Assistance Program (LIHEAP) Subgrantee Agreement:

- 1) Cost Allocation Plan (CAP)
- 2) Annual LIHEAP Budget
- 3) Assurance 16 (Client Education) Annual Proposal (Appendix A)**
- 4) Board Roster, Bylaws (most recent version), Resolution authorizing the execution of the LIHEAP Agreement and any Minutes related to the LIHEAP Agreement
- 5) Certificate Regarding Lobbying
- 6) Proof of Insurance Coverage for the following (See Section VII of the LIHEAP Subgrantee Agreement for minimum coverage amounts):

- a) Workers' Compensation
- b) Commercial General Liability
- c) Automobile (if necessary)
- d) Professional Liability (Errors and Omissions)
- e) Cyber Liability

The LIHEAP amounts in the annual budget must be based upon the maximum amount allocated to the Subgrantee on Attachment A of the Subgrantee's LIHEAP Subgrantee Agreement.

Upon LHC review and approval of a Subgrantee's cost allocation plan and annual LIHEAP budget, Subgrantees may request reimbursement costs for administering LIHEAP in accordance with all federal and state regulations, as well as all LHC requirements set forth in the LIHEAP Subgrantee Agreement and other policies and procedures. **(See Chapter 7 for Subgrantee Financial Management/Invoice Procedures)**

2.5 Subgrantee Production Benchmarks

All Subgrantees are expected to meet stated service delivery benchmarks as outlined in **Section IV. Performance-Based Requirements** of the Low Income Home Energy Assistance Program Subgrantee Agreement. Failure to reach these benchmarks may result in reductions and or total elimination of funds.

2.6 Reporting Requirements

Federal regulations require LHC submit reports on an annual and quarterly basis to the U.S. Department of Health and Human Services (DHHS). LHC and the Subgrantees will provide statistical data as generated by the LES system. The Subgrantees will send their reports to LHC. LHC will in turn consolidate the data to complete and submit program reports to DHHS.

A. Weekly/Monthly/Quarterly Reports

1. Subgrantee shall submit expenditures and activities by entry into the web-based, Louisiana Energy Software System (LES) for client services and administrative, program support, and Assurance 16 cost reimbursements. A Subgrantee's certification of client services equals a signed report ready for review and processing submitted to LHC and should contain the appropriate information, invoices and supporting data in the electronic submission in LES.

Subgrantee shall produce and make available all records necessary for adequate verification of expenditures and activities submitted at the request of LHC.

All adjustments, if any, must be reported through LES under the report period in which the expenditures occurred.

2. **Weekly** reports for **client services** should be submitted to LHC **each week on Friday**, irrespective of the level of activity or amount of the expenditures in the preceding period. **No reports should be submitted on Mondays** due to vendor validation processing at the State level.

Monthly reimbursement requests for **administrative, program support, and Assurance 16 expenditures** should be submitted to LHC by **the fifteenth (15th) calendar day of the subsequent month** (or next business day following the 15th day) for the previous month.

3. LHC shall disburse administrative, program support, and Assurance 16 reimbursement requests to the statewide Subgrantees within fifteen (15) business days after receipt of an **accurate, signed report**.

LHC will make payments directly to the vendors who have submitted the W-9 form and have a signed Vendor Agreement with LHC via electronic transfer or paper check, based on the process the vendor has elected. This shall be done within fifteen (15) business days after receipt of an accurate, signed report for client services from the Subgrantee.

LHC will make payment to the Subgrantee on behalf of the vendor for those who have not submitted the W-9 form and a signed Vendor Agreement to LHC within ten (10) business days after receipt of an accurate, signed report for client services from the Subgrantee. The Subgrantee will be responsible for paying the vendors directly.

4. Quarterly reconciliation reports may be required to reconcile the funds drawn from LHC and funds expensed by Subgrantee.

Timely submission of the reports will be closely monitored by LHC. If the Subgrantee consistently fails to submit reports timely, LHC may impose sanctions prescribed in the contract

B. Close-Out Report Requirements

1. LIHEAP Grant Closeout Checklist

Subgrantee shall submit a close-out report, verifying all actual, allowable, and allocable costs submitted during the term of the contract.

Administrative costs, outreach, intake, and training and technical assistance shall not exceed the maximum allowable amounts.

Administrative, program support, and Assurance 16 costs shall remain proportionate to the cumulative allowable program expenditures. Any administrative, program support, and Assurance 16 costs that exceed these limits shall be disallowed and returned to LHC within **thirty (30) calendar days** after expiration of the program year contract.

The final close-out report shall include the documents listed on the LIHEAP Closeout Checklist (**Attachment B of the LIHEAP Agreement Contract**), signed by the authorized representative of the Subgrantee. This report is due within **thirty (30) calendar days** after expiration of the program year contract.

2. Client Education Closeout Report

Subgrantees must provide an end-of-year client education expenditure status report that details the type of expenditures and the number of families served. **Assurance 16 (Client Education) Household Tracking Report (Appendix O)**. This report is due **annually by August 15th** for the period covering August 1st – July 31st of the previous year.

All expenditures must be incurred during the program year and documentation must include copies of complete receipts and the cancel checks made to the vendor. Purchase orders and/or Quotes are not considered documentation and may not be used to verify purchases.

2.7 Recordkeeping

LHC will monitor recordkeeping practices to assure Subgrantees are adhering to the stated requirements.

A. Record Retention Requirements

LHC contract provisions require LIHEAP records be retained for a period of **at least six years** after final payment is made to the utility vendor or Subgrantee. This provision applies to all financial records, supporting documents, statistical records and any and all other records pertinent to the contract or expenditures.

The exceptions are as follows:

- If any litigation, claim, or audit is started before the expiration of the six year period, the records shall be retained until all litigation, claims or audit findings involving the records have been resolved and final action has been taken and documented.
- Records for real property and equipment acquired with LIHEAP contract funds shall be retained for six years after final disposition.

Subgrantee should maintain and retain all records in such a manner that a review and reconciliation of any selected invoice could be performed and all supporting source documentation would be easily accessible for presentation.

Once a program year has ended, it is recommended that Subgrantee maintains all LIHEAP records for that program year together in a specific location.

B. Client File Set-Up and Maintenance

LHC encourages electronic storage of files with nightly back-up. As required by LHC, client documents must be uploaded to the LES.

Client files whether stored electronically or hardcopy must be clearly labeled and identifiable. Files shall be maintained exclusively for LIHEAP by Applicant.

Each file shall, at a minimum, contain the forms and documentation completed and signed, as appropriate. The completed file should provide an accurate record of each phase of service delivery from the initial application to the documentation and compilation of the total cost of service delivery. **Format for LIHEAP Applicant Files (Appendix B).**

C. Electronic Signatures

LHC **encourages** the use of electronic means of signature in the LIHEAP process to expedite communication and service delivery. Electronic signatures may be used where required **as long as the following requirements are satisfied:**

1. Electronic Form of Signature

Electronic signatures can take many forms and can be created by many different technologies. Examples of commonly used electronic forms of signature include:

- a. Symbols such as:
 - A typed name (e.g., typed at the end of an e-mail message by the sender or typed into a signature block on a website form by a party);
 - A digitized image of a handwritten signature that is attached to an electronic record;
 - A shared secret (e.g., a secret code, password or PIN) used by a person to sign the electronic record. ("Shared" means that the secret is known both to the user and to the system);

- A unique biometrics-based identifier (e.g., a fingerprint, voice print or a retinal scan); or
 - A digital signature.
- b. Sounds such as:
- A sound recording of a person's voice expressing consent;
 - Processes such as using a mouse to click a button (such as clicking an "I Agree" button); and
 - Using a private key and applicable software to apply a "digital signature" or scanning and applying a fingerprint.

This is not an exhaustive list, but it illustrates the variety of options available for use as an electronic form of signature. As technology advances, future methods may be adopted.

2. Intent to Sign

For an electronic form of signature to be legally effective as an electronic signature, it must be executed or adopted by the signer with **an intent** to sign. It is important that the record, and/or process by which a person applies an electronic form of signature to the record, be designed to indicate the means by which the signer can indicate his or her intent to sign the record.

The following are some examples:

- "By signing below, I agree to the following terms";
- "Click to agree";
- "By signing below, I attest that the information provided is true and agree to allow the CAA or LHC to verify such information", and
- "I hereby certify that..."

3. Association of Signature to the Record

In order to be legally significant, the signature must be attached to or logically associated with the record being signed. "**Association**" means:

- The process must be clear to the signer as to exactly what it is that he or she is signing;

- The signer must have an opportunity to review the record before signing it and to clearly understand the parameters of the record he or she is signing; and
- The electronic form of the signature applied by the signer must be linked to the record being signed.

The association must be done in a manner that allows someone to later determine that the record has been signed. The data constituting the electronic form of signature must be stored in a way that permanently associates it with the electronic record that was signed.

4. Integrity of the Signed Record

Subgrantees utilizing e-signatures must ensure that documents signed electronically **cannot be altered**. If changes to the document are made, the electronic process must be designed to provide an “**audit trail**”, showing all alterations, the date and time they were made, and the identity of the person who made them.

D. Electronic Transmission of Files

1. Electronic Mail (E-mail) Requirements

All Subgrantee staff, contractors, and volunteers engaged in grant-funded activities **must** conduct official business using email accounts that are:

- Issued, managed, and controlled by the Subgrantee organization; **and**
- Associated with the Subgrantee's official domain (e.g., @agencyname.org).

The use of **personal** or **private** email accounts (including but not limited to Gmail, Yahoo, Hotmail, iCloud, or similar services) for grant-related communication is strictly prohibited.

2. Subgrantee Documents

LHC permits electronic transmission of approved or required documents when local, state, or federal law permits. The **preferred method** is by upload to the LES system (if PII is included) or by secure Subgrantee-controlled email account. Adequate security measures and choice of transmission method **must ensure** the security of sensitive information included in such documents.

3. Client Documents

a. Client Submission to Subgrantee

If a Subgrantee chooses to utilize electronic communication procedures, Clients may also choose to communicate electronically with the Subgrantee. They may complete most documents online or by hand and then transmit and/or scan and email them electronically to the Subgrantee.

Clients may also submit information and documents using other methods, such as the LES system, tablet or smart phone apps, email, or other electronic media. Subgrantee **may designate** specific methods as acceptable for electronic transmission. However, Clients **must have the opportunity** (if they desire) to provide information and documents in paper copy, including both before they have provided any information or documents electronically or after they have done so and wish to discontinue.

b. Subgrantee Transmission to Clients

Subgrantees may provide documents electronically or make such documents available in an electronic format when state and local laws permit. If a Subgrantee chooses to provide documents electronically, the Subgrantee should inform Clients of their option to receive such documents in paper form.

If required notices or forms are distributed electronically, LHC recommends that Subgrantee request an electronic acknowledgement of receipt. Where LHC does not **specifically require** Client acknowledgement of receipt, Subgrantee should nonetheless maintain records showing that they provided Clients with the electronic file or the electronic address used to access the document.

When providing documents, forms, or notices electronically, Subgrantee must be sure to comply with Client notification requirements in this guide. When local, state, federal laws or regulations require that specific documents be provided by first class mail, delivered in person, or other specified means, the document must be provided using the stated required procedures and may not be solely transmitted electronically.

c. Transmission Methods

When transmitting documents electronically, industry partners must use National Institute of Standards and Technology (NIST) compliant methods. Examples include putting the documents inside an encrypted wrapper, such as a password protected DOC, PDF, or ZIP file. Passwords should not be included in the same transmission as the documents. It is preferable to provide the recipient with the password by calling, texting, or in a separate email. LHC strongly recommends using an encrypted transfer mechanism such as a shared link with an encrypted cloud storage service, an encrypted mail service, or web encrypted transfer tools.

Other possible methods for transmitting electronic documents and data must comply with LHC's security requirements. They may include but are not limited to the following:

- Removable electronic media, such as thumb drives or SD cards;
- Direct access (i.e., providing login information to a system in order to access electronically signed and/or stored documents); and
- Other compliant technology as developed.

d. Personally Identifiable Information (PII)

All documents containing or conveying PII must be encrypted or transmitted in a secure manner in order to safeguard this information. When sending sensitive PII via email or via an unsecured information system, make sure the information and any attachments are encrypted.

Do not place PII on shared drives, multi-access calendars, on Intranet, or the Internet unless they are compliant with the terms of this Guide.

Do not let documents with PII sit on a printer, scanner, or fax machine where unauthorized employees or contractors can have access to the information.

e. Security

Data and information stored electronically must be maintained and used in ways that ensure the security, protection, and confidentiality

of any information as required by federal, state, or local law. Data security management is a way to maintain the integrity of electronic data and to make sure that the electronic data are not accessible by unauthorized parties or susceptible to corruption.

Report any breach to the integrity of any electronic data that contains either sensitive information or information pertaining to electronic signatures to LHC. Such security policies should comply with federal, state or local laws, regulations, and guidance.

Utilize a method to track electronic activity associated with sensitive documents and information. In the event of a data breach, Subgrantees should have a method to facilitate disclosure to those affected by the breach.

Such tracking methods should also be designed in such a way as to allow security audits of the electronic data when requested by federal or state agencies. Such audits must be permissible and conducted within the protections of the Privacy Act and other privacy and confidentiality laws and regulations.

2.8 Inventory Control

A. Inventory List

Any equipment or supplies (i.e. laptops, printers, scanners, etc.) over \$100 that are purchased with program funds for use by the Subgrantee shall remain the property of LHC and the LIHEAP Grant. Subgrantee shall be required to sign for equipment and supplies delivered to their location and shall maintain a LIHEAP inventory log. The inventory log shall contain, at a minimum:

- The date the equipment or supplies over \$100 were received
- The brand name/manufacture of the equipment/supply
- The serial number (if applicable) of the equipment/supply
- The location within the Subgrantee's building where the equipment/supply is located (For example: reception area, Classroom 1, Customer Intake)

The Subgrantee may utilize their own inventory forms, but should be able to account for LIHEAP equipment/supplies separately from their own equipment.

B. Transfer of Equipment/Supplies

If the equipment/supply is transferred to a different building or off-site location (another Subgrantee office), the inventory list will be changed to indicate where the equipment was transferred to, and to whom the equipment was transferred. The inventory file shall be maintained in the files at the Subgrantee's main office along with other required LIHEAP correspondence and files.

C. Service on Equipment

1. New Equipment or Supplies over \$100

Any product warranty requirements such as registration of the warranty will be handled by the Subgrantee. Requests for warranty service will originate with the Subgrantee utilizing the equipment.

2. Equipment/Supplies no longer under warranty to the manufacturer or vendor

Should equipment/supplies no longer under warranty require service or need repair, the Subgrantee should determine if the cost to repair is justified or whether it would be more cost effective to replace the equipment/supply. The decision to repair or replace the equipment/supply may require LHC approval due to cost (**See Section 7.11**). The cost to replace or repair is not guaranteed by LHC and will be determined based on availability of funds.

CHAPTER 3: SERVICE DELIVERY AND ELIGIBILITY DETERMINATION

This chapter provides Subgrantees with guidance regarding effective delivery of LIHEAP services to eligible Louisiana households.

SERVICE DELIVERY

3.1 Customer Service

Customer service is defined as an organization's ability to meet its customers' needs in a timely and efficient manner. The applicant shall be viewed as a "customer" at all times. The Subgrantee shall provide courteous, convenient, and prompt service to all LIHEAP customers. All customer contacts should be noted in the file, dated and should contain a brief statement regarding the contact.

A. Customer Service Requirements

The Subgrantee shall:

- Have a sufficient number of well-trained intake workers
- Ensure that intake workers treat customers respectfully and courteously.
- Develop an intake process that incorporates in-person customer interviews, phone interviews, mail-in and online applications.
- Annually assess the process for customers to apply and strive to reduce assistance processing time.
- Applications must be processed on an as-received basis, considering all application pathways, as well as allowing for intermittent crisis applications and special consideration for LIHEAP priority groups (i.e. elderly/disabled).
- Subgrantee must ensure clients do not encounter a busy signal when attempting to contact the Subgrantee. Messages must include ways to apply and times.
- Subgrantee must have a referral option (i.e. 211, findhelp.org, etc.) for customers needing emergency assistance after-hours or on weekends or holidays.
- Consider the needs of the customer, when implementing the application process.

- Provide materials and forms in multiple languages based on the community.
- Address the customer's LIHEAP assistance questions and concerns both during and post application.

B. Customer Satisfaction Surveys

LHC may periodically conduct customer satisfaction surveys. Results of the surveys will be provided to each Subgrantee with recommendations for improvement. Subgrantees are encouraged to survey customer service satisfaction, and adjust application procedures, as deemed necessary.

3.2 Outreach

Section 2605(b)(3) of Public Law 97-35 requires that outreach for off-site activities be designed to assure that eligible households, especially households with elderly or disabled individuals, households with children under the age of 6, and households with high energy burden are aware that assistance is available. Subgrantee shall make a systematic attempt to provide services beyond conventional limits, including home-bound eligible applicants.

Subgrantees should have a written Outreach Plan, which should be reviewed annually and updated as needed. This plan must be available for review upon request, as well as during the Subgrantee's monitoring.

A. Frequency of Outreach

The Subgrantee shall conduct **off-site outreach activities** at **least twice a year**. More frequent activities shall be conducted if:

- Services are not being sufficiently utilized by the general population
- Services are not being sufficiently utilized by targeted population households or by new customers.
- Applications are not being generated from all geographic areas of the Subgrantee service territory.

B. Types of Outreach

Outreach methods include, but are not limited to, the following:

- Off-site events for distribution of LIHEAP information (churches, community centers, etc.)
- Newspaper advertisements

- Radio/TV Public Service Announcement (PSAs)
- Subgrantee website announcements
- Social Media (Facebook, Twitter, Instagram, etc.)
- Flyers, leaflets
- Community newsletters, church bulletins
- Presentations at community or school meetings
- Posters
- Referrals from community organizations
- Referrals from social service organization

Subgrantee shall use their knowledge from servicing low-income populations to determine the most effective outreach methods for their service area, subject to LHC periodic review.

C. Information to be contained in Outreach Material/Message

Written outreach material should include the following information:

- LIHEAP Program information
- Application dates
- Application times
- Application place and location
- Eligibility information
- Required Documentation
- Targeted groups
- Name and telephone number of person to contact for additional information
- Non-discrimination provisions set up in Section 2606 of Public Law 97-35 and **Section 3.3.B**

D. Monitoring Requirements and Documentation

Documentation of all outreach materials and activities should be maintained and readily accessible for review during LHC monitoring visits. Documentation should also include, but not be limited to the following:

- Notice of publication along with a copy of newspaper advertisements
- Copies of flyers, leaflets, and posters along with a listing of where and when they were distributed or posted
- Dated meeting agenda which reflects outreach presentation
- Copies of radio and television notices along with announcement dates
- Copies of social media notices (Face Book, Twitter, Instagram, etc.) along with dates they were posted

Monitors will examine outreach materials to ensure that materials meet the minimum informational requirements. Monitors will also evaluate the effectiveness of outreach by assessing the number of targeted households served and determining whether those households are geographically distributed throughout the Subgrantee's service area.

3.3 The Application Process

The Subgrantee must ensure that all persons are given the opportunity to apply for LIHEAP services, and the eligibility determination process remain fair, equitable, and non-discriminatory.

A. Intake Procedures

1. The Subgrantee must devise and plan to distribute service funds throughout the entire service delivery area. This process ensures a fair distribution of funds based on the percentage of eligible population in each geographic location. Subgrantee must be able to provide some type of weekly presence in each parish it serves.
2. Applicants for LIHEAP services shall be taken on an as-received basis, utilizing all application pathways, until all service funds are exhausted. This applies to all LIHEAP funds.

a. Applications

Subgrantees must incorporate telephone calls, walk-ins, mail-ins and online applications to apply. Subgrantees should maintain a chronological log of all applicants, including the applicant's name, contact method, date and time, and the time and date of the application. Subgrantee must ensure their policies and procedures clearly state how they will assist all clients in a fair and consistent manner while allowing for crisis to be addressed within federal

timelines **(See Section 5.1.D)**. LHC will review this policy during annual monitoring visits.

b. Waiting Lists

Subgrantees are permitted to create a waiting list when all service funds have been exhausted, provided the list is generated based on the procedures above. When additional funds become available during the program year, applications must be processed from the waiting list first. Waiting lists are valid for the current program year and shall be discontinued at the end of each program year. Applicants placed on a waiting list for LIHEAP services should be informed the list is temporary based on available funds and there is no guarantee they will be given an appointment to complete an application.

3. Intake procedures must allow for special considerations for LIHEAP priority groups (i.e. elderly and/or disabled). Applications for the elderly (60 and above), and those with disabilities, must be given special consideration at least weekly in the form of a specific time and/or day to apply.
4. The Subgrantee shall develop a fair and consistent means by which home-bound applicants may be provided the opportunity to apply for services. Subgrantee shall make provisions for home-bound and infirmed applicants in accordance with Section 2604I (3) (B) of Public Law 97-35 by either traveling to the applicant or may allow a homebound applicant to designate an authorized representative to apply for LIHEAP services on their behalf. A signed statement by the applicant that names the authorized representative is required. The designated person should sign all LIHEAP forms using their name and the applicant's name (e.g. "Jane Doe for Mark Jones").
5. The Subgrantee shall make reasonable accommodations based on the age, infirmity or disability of the targeted population placing special emphasis on applicant safety.
6. Subgrantee, representatives or intake workers shall assist the customer in completing the application, if needed. The application must be signed and dated by each applicant and a Subgrantee representative **(See Section 2.7.C)**.

B. Non-discrimination

The Louisiana Low-Income Home Energy Assistance program prohibits discrimination on the basis of race, color, religion, sex, sexual orientation, gender identity, political affiliations, national origin, disability or age in programs and activities. For all regulations, please refer to the LIHEAP Subgrantee Agreement.

C. Confidentiality

Louisiana's Confidentiality Law R.S. 46:56 applies to all case records kept by State Agencies and Private and Public Service Contractors.

The confidentiality law prohibits release of client identifying information from the LIHEAP applications or case records to any other organization or agency outside of LHC without prior written consent of the individual. Information may be released upon completion of the authorization section on Page 2 of the application. This form must be signed by the customer and maintained in the customer's case record. This information should be completed and signed at the time of the request to assure customers are aware of the information being sent.

Subgrantees must ensure that **Protected Personally Identifiable Information (PII)** is protected at all times. PII is defined by the Office of Management and Budget (OMB) as: *Any information about an individual maintained by an agency, including but not limited to, education, financial transactions, medical history, and criminal or employment history and information that can be used to distinguish or trace an individual's identity, such as their name, social security number, date and place of birth, mother's maiden name, biometric records, etc., including any other personal information that is linked or linkable to an individual.*

This definition of PII can be further defined as:

1. **Public PII:** PII found in public sources such as telephone books, public websites, business cards, university listing, etc. Public PII includes first and last name, address, work telephone number, email address, home telephone number, and general education credentials.
2. **Protected PII:** Subgrantees must never release any Protected PII to any other organization or agency outside of LHC. Examples include:
 - ❖ Social Security Numbers in any form
 - ❖ Place of Birth associated with an individual
 - ❖ Date of Birth associated with an individual
 - ❖ Mother's maiden name associated with an individual
 - ❖ Biometric record associated with an individual
 - ❖ Fingerprint
 - ❖ Iris scan
 - ❖ DNA

- ❖ Medical history information associated with an individual
- ❖ Medical conditions, including history of disease
- ❖ Metric information, e.g. weight, height, blood pressure
- ❖ Criminal history associated with an individual
- ❖ Employment history and other employment information associated with an individual
- ❖ Ratings
- ❖ Disciplinary actions
- ❖ Performance elements and standards (or work expectations) are PII when they are so intertwined with performance appraisals that their disclosure would reveal an individual's performance appraisal
- ❖ Financial information associated with an individual
- ❖ Credit card numbers
- ❖ Bank account numbers
- ❖ Security clearance history or related information (not including actual clearances held)

D. Application Disposition

1. Certification of Eligible Households

To comply with the provisions of Section 2605 (b) (7) (A) of Public Law 97-35, which requires each participating household be notified of the assistance amount paid on its behalf, Subgrantee shall notify each household of the eligibility decision. The notification of eligibility letter certified from the LES computer system shall be (1) provided to the applicant at time of application or (2) e-mailed or mailed to the applicant. For home-bound and/or disabled applicants, the notification of eligibility must occur within 15 days of the date of application. A copy of the notification of eligibility letter must be retained in the applicant's case record.

2. Service Denials

When LES determines that an applicant does not meet eligibility requirements, the request for assistance shall be denied. The LES computer system generated denial letter shall be mailed within five (5) business days of the date of application and a copy shall be retained in

the applicant's case record. **If applying in person, the applicant should be provided a denial letter at the time of application.**

3. Incomplete Applications

Applications are considered incomplete when the applicant doesn't provide all of the necessary information and documentation.

The Subgrantee shall inform the applicant that they have **ten (10) business days** to submit necessary information and documentation. **LIHEAP Application Required Documents Form (Appendix D)** If the documents are not received by the deadline and the applicant has not contacted the Subgrantee to request additional time to acquire the required documentation, the application will be denied and the client should be notified that they will have to re-apply. In no case shall the application remain unprocessed for longer than ten (10) business days.

- a. The Subgrantee must enter the application information as it is received into LES for all applications. If all requested documentation is not received by the deadline date given in the notice, then Subgrantee must go into the system and deny the application.
- b. Applicants shall be notified in writing that their application for service is being denied due to failure to provide necessary information. A copy of the denial letter from LES shall be retained with any incomplete application form and materials.

3.4 Applicant Appeals and Grievances

A. Applicant Appeals

In accordance with Section 2605 (b) (13) of Public Law 97-35, applicants are to be provided an opportunity for a fair hearing when assistance is denied or is not acted upon with reasonable promptness.

1. Notification of Right to Appeal

Each applicant is to be informed in writing at the time of application of their right to a hearing, the method by which a hearing may be requested, and who may present their case. The Intake Worker must also give the applicant an oral explanation about fair hearings, including information regarding any contact or discussion between the applicant and Subgrantee staff concerning denials, rejections, terminations, and reduction of services.

2. How to Appeal or Request a Fair Hearing

a. **First Level – Subgrantee/Local Review** When an applicant is denied or not acted upon with reasonable promptness, the applicant has the right to request a review by the Subgrantee's Appointing Authority or Delegated Authority approved by LHC. Upon receipt of the applicant's First Level Appeal request, the Subgrantee must respond with a decision in writing to the applicant and cc: LHC within **fifteen (15) business days of the request**. The decision letter must notify the applicant of their right to a Second Level Appeal by LHC. **Sample Appeal Decision Letter (Appendix C).**

b. **Second Level – LHC Review** If the issue cannot be resolved at the Subgrantee level, an applicant may make a written request for a Second Level Appeal to LHC. The written request should be submitted with an explanation of the issue on the back of the service application form under Right to Appeal and Fair Hearing with continuation on separate attached paper, if necessary. If the application form is unavailable, the applicant may state the request in a letter addressed to the Louisiana Housing Corporation (LHC), 2415 Quail Drive, Baton Rouge, LA 70808. If assistance is requested, the Subgrantee may assist the applicant with the preparation of a written request. The request must be received by LHC, or Subgrantee, or postmarked within **ten (10) business days of the First Level Appeal decision**. LHC will make a written determination to the applicant and cc: the Subgrantee within **fifteen (15) business days of receipt**. LHC's response will include further instructions for a Fair Hearing in the event the decision is unfavorable to the applicant.

c. **Third Level – Administrative Law Judge** In the event an applicant is still dissatisfied, LHC will retain an Administrative Law Judge to preside at the hearing and follow applicable laws to render a decision. Services will not begin until the matter is resolved.

Within **five (5) business days**, upon receipt of a request for a fair hearing, LHC shall schedule a fair hearing to be conducted no later than **fifteen (15) business days** from receipt of a request for a fair hearing. The fair hearing shall be conducted in accordance with the following criteria:

- i. The hearing shall be held in a place reasonably convenient to the applicant and open to the public.

- ii. The applicant shall receive notification of the hearing **no less than five (5) business days** before the scheduled hearing, to enable a proper preparation of the applicant's appeal.
- iii. The applicant shall have an opportunity to review his/her claim file, which contains all the evidence to be presented, prior to the hearing.
- iv. The hearing officer shall be an impartial adjudicator who has not participated in the decision being appealed.
- v. The applicant is guaranteed the right to:
 - o Have a representative at the hearing;
 - o Present evidence, including oral and/or written statement on his/her behalf;
 - o Present witnesses; and
 - o Cross-examine witnesses.
- vi. The applicant shall be given the opportunity to elect to have the matter determined through use of a declaration in lieu of personal appearance.
- vii. The hearing officer shall issue a final decision, in writing, within **thirty (30) calendar days** following the conclusion of the fair hearing.

B. Subgrantee Internal Grievance Procedure

All Subgrantees are required to maintain a written internal grievance procedure for their customers. The grievance procedure ensures that the Subgrantee resolves customer dissatisfaction with **issues not related to eligibility decisions**. Such grievances include, but are not limited to:

- Manner in which a service is rendered by the Subgrantee
- Quality of the service
- Behavior of Subgrantee personnel

The grievance procedures should be developed in accordance with the following guidelines:

- Written in a manner which is easily understood by customers
- Posted in areas which are frequented by customers

- Include timeframes for each step of the procedure
- Include a statement that the Subgrantee will assist persons in filing a grievance. The name, title and telephone number of the Subgrantee shall be included.
- Made available to all persons who state concerns or complaints covered by the grievance procedures.

3.5 Applications by Employees and their Relatives

A. Employees

Many employees working for service provider agencies may be eligible for LIHEAP benefits. It is imperative that agencies follow the guidelines listed below when taking and processing applications for their employees:

- Employees are to notify the Executive Director or their Authorized Representative if they intend to apply for LIHEAP benefits.
- Employees are subject to and should participate in the same appointment process used by other applicants.
- Employees are not to participate in the creation of their file or input of their application. Data input should be done only by another employee who has been assigned that task by a supervisor, LIHEAP Director, or the Executive Director.
- Upon completion, the file should be reviewed for completeness and accuracy by a supervisor, and then approved by the Executive Director.

B. Relatives of Employees

The relatives of employees are to be treated no differently than any other applicant. Relatives of employees by marriage are considered relatives.

- They are required to utilize the same appointment process as any other applicant.
- An employee may not set up a relative's appointment.
- If an employee becomes aware a relative is applying for LIHEAP assistance, that employee must notify their supervisor.
- Employees are prohibited from handling a relative's application.

Louisiana LIHEAP Service Delivery Guide

- The Supervisor, LIHEAP Director, or the Executive Director must assign another non-related employee to create the file and input data on the employee's relative.
- Upon completion, the file must be reviewed for completeness and accuracy by a supervisor, and then approved by the Executive Director.

ELIGIBILITY DETERMINATION

3.6 Eligibility

Requirements for the LIHEAP **Heating/Cooling** regular benefits are:

- Proof of Identity
- Social Security Numbers
- Income eligibility determination
- Citizenship verification
- Vulnerability (Responsibility for the household energy account)
- Active energy account verification
- Utility Allowance Confirmation, if applicable (**See Section 4.1.C**)
- Disability status verification, if applicable (**See Section 4.2.A**)

Documents required for completing the application can be found on the **LIHEAP Application Required Documents Form (Appendix D)**.

Applicant is defined as the primary individual (age 18 or older) that is applying for assistance and who is responsible for the household energy cost.

Household Member is defined as anyone living at the address full-time within the last 30 days of application. The following household members who are using the address are **excluded** from the application:

- Children who are away at school,
- Children who are absent due to placement in a foster home,
- Children in joint custody arrangements who are present less than 50% of the time,
- Live-In Aides (no family relation),
- Members who are incarcerated or at a correctional facility,
- Members who are on active military duty,
- Members who are permanently institutionalized, and
- Members who are confined to a hospital, nursing home, or rehabilitation facility.

A. Proof of Identity

Proof of identity is defined as a government-issued **photo** identification with the **applicant's name**. It is **required** for the applicant and all household members age 18 years and older. This document may be expired or active. Acceptable documents may include:

- Any U.S. State issued Driver's License
- Any U.S. State issued Identification Card
- Military Identification Card
- U.S. Passport
- Tribal Identification Card, etc.

B. Social Security Numbers

A photocopy of the Social Security Card is required for the **Applicant** and **all other household members**. **Exceptions** are made for any child born within the previous twelve months of application for which the SSA has not issued a SSN yet.

NOTE: *Children who qualify as the exception should be entered into the LES system using all 9s (999-99-9999).*

All other household members without a verified SSN cannot be included on the LIHEAP application.

C. Household Income Eligibility

The LES system is programmed to block applications when total household income exceeds the current income guidelines.

1. Definition of Income

Subgrantee must use a household's **total countable income**. Total income cannot exceed 60% of the Louisiana State Median Income in order to qualify applicants to receive assistance.

Earned and/or unearned income must be used in determining eligibility for LIHEAP assistance. **The gross amount of income prior to deductions will be counted unless otherwise specified.**

- **Earned income** is defined as either cash, or in-kind income received as compensation for wages, salaries, commissions, or profit through employment or self-employment.
- **Unearned income** is defined as income which was not received as a result of the performance of a service, or earned from sources other than employment, self-employment or in-kind income.

Individuals whose income must be counted are:

- Any income of a household member age 18 and older, including ineligible household members (non-qualified aliens).

Subgrantee shall use the following inclusions and exclusions in determining an applicant's income: **Income Inclusions and Exclusions Chart (Appendix E)**

a. Income Inclusions

- Alimony
- Family Independent Temporary Assistance Program (FITAP) formerly TANF
- Dividends and interest
- **Gross** Government employee pensions
- **Gross** wages and salary
- Insurance or annuity payments
- Jury Duty Compensation
- Military family allotments
- **Net** gaming winnings
- **Net** rental income
- **Net** receipts from self-employment
- **Net** royalties
- **Net** Social Security Administration (SSA) benefits
- Periodic receipts from estates or trusts
- **Gross** Private pensions
- **Gross** Railroad retirement
- Regular Contributions that are not loans to be re-paid
- Social Security Supplemental Income (SSI)
- Strike benefits from union funds
- Training stipends
- Unemployment compensation
- Veteran's payments
- Worker's compensation benefits

b. Income Exclusions (not counted as income)

- Capital gains
- Bank withdrawals (from savings, CD's, retirement accounts, etc.)

- Sale of property, home, or car
- Any non-cash assistance from DCFS (Department of Children and Family Services - i.e. Nurse-Family Partnership Program, Early Childhood Supports Services, Jobs for America's Graduates LA (LAGS-LA) Program) For more information, visit website: www.dcfslouisiana.gov.
- Tax refunds
- Irregular Contributions (Gifts)
- Loans to be repaid
- Lump sum inheritances
- One – time cash payments
- Section 8 Utility Reimbursements (UR) (Amount that exceeds the tenant's Total Tenant Payment (TTP))
- Food or housing received in lieu of wages
- Food or fuel value for working on farms
- Rent value from owner-occupied housing
- Federal non-cash benefits
- Child support payments
- College scholarships (Updated Sept 2011)
- VA Reimbursements for doctor's visits

2. Determining Monthly Income

Subgrantee shall adhere to the following guidelines in determining a household's income. The information collected by the Subgrantee shall be entered into the LES computer database, and the LES system will determine the monthly income automatically based on the data entered.

a. Verifying Earned Income

Monthly average income must be verified by any **one** of the following:

- All check stubs from the previous 30 days. If the applicant does not have all the required check stubs, the **Verification of Employment (VOE) (Appendix F)** must be completed.
- **Self-Employment**
 - Self-employed applicants must provide a copy of their most recent federal income tax return with all accompanying schedules for the most recent year ending December 31st.

- If self-employment recently began, the tax return has not been filed, or it is after April 15th, the applicant must also complete the **Self-Employment Self Certification Form (Appendix G)** attesting to current monthly earnings and losses **supported by the corresponding bank account statements**.
- If bank statements are not available, the client must submit documentation to support their earnings (invoices, receipts, etc.) and losses (business expenses).
- Unless there is reason to doubt the Self Certification, the most current documentation will be used to calculate income.

- **Termination**

- If an applicant is recently **employer terminated or laid off, do not** consider the last check stubs in determining income. The applicant is considered to have zero income.
- Documentation of employer termination/layoff must be provided by the applicant and must be retained in the file.
- If the applicant is unable to provide documentation of employer termination/layoff, a **Verification of Employment (VOE) form** must be completed by the applicant's previous employer. Subgrantee must ensure the "Employment Status" section is completed.
- **This does not apply to employee resignation which still requires 30 days of income support.**

b. Verifying **Unearned** Income

- Each applicant must be questioned regarding **unearned income**. Unearned income includes, but is not limited to, Social Security, alimony, retirement benefits, worker's compensation, supplemental security income (SSI), interest payments, rental income and regular contributions.
- Documentation of unearned income includes, but is not limited to, award letters, annuity letters, court judgments, current bank statements (all pages), and copies of recent checks.
- Documentation of only Social Security benefits may include Food Stamp (SNAP) certification letter or printout dated within the past 12 months of the application date.

c. Calculating Average Income

- i. The applicant's average income is calculated using the gross amount from each pay period. Enter the gross amount of income as shown on the check stubs into LES.
- ii. If earnings fluctuate greatly, determine if the fluctuation is due to an unusual circumstance (e.g., death, substituting for a co-worker, Christmas bonus). If so, exclude the pay stub(s). Decisions to exclude pay stubs must be **clearly documented** in the applicant's file.
- iii. If the fluctuation occurs regularly (e.g., overtime, shift work), include the pay stub(s). A fluctuation can be considered regularly occurring if it appears on at least two of four consecutive check stubs. Some jobs, such as home healthcare, where the employee is paid every two weeks may have reduced hours in the 2nd week due to scheduling. If that is the case the input worker will need documentation for a least a month so the average of the two pay sessions may be determined.
- iv. It may be necessary to contact the applicant's employer to determine if the fluctuation is unusual or regularly occurring.

The **LIHEAP Energy Software (LES)** automatically calculates the average monthly income, after the pay stub amounts are entered. In the event the system is down, the **Income Determination Worksheet (Appendix H)** may be used to determine the monthly income for completing paper applications, until they can be entered into the LES for processing.

d. General Information

- i. **Fraud Prevention.** Intake workers are required to inform all applicants **prior** to the start of the application process they are subject to prosecution under Title 18 of the U.S. Code if they knowingly give false, incorrect, or incomplete information during this application. **(See Chapter 9).**
- ii. **Zero Income.**
 - If an applicant or any household member 18 years of age or older, reports zero income, the **Zero Income Statement Form (Appendix I)** must be signed by the individual with no income.
 - If **no one in the household** reports any income, the applicant must also explain how household expenses

are paid utilizing the **Zero Income Supplemental Sheet (Appendix J)**.

- All zero income statements should include an acknowledgement that providing false information will subject them to prosecution for falsely obtaining assistance.
- **Expenses are not considered income.**

iii. **Categorical Eligibility.** An applicant's eligibility for food stamps, supplemental security income (SSI), FITAP and KCSP Assistance or Veterans benefits **does not automatically determine income eligibility for LIHEAP.**

iv. **Regular Contributions.**

- Contributions received by the applicant on a regular basis (i.e. weekly, bi-weekly, monthly, and quarterly) and that are not loans to be repaid **must be counted** as income.
- When an applicant is receiving Regular Contributions, a **Statement of Contributions (Appendix K)** form must be completed and signed by the contributor.

v. **Self-Certification.**

- After **all other avenues** of documenting income eligibility are exhausted, self-certification is allowable.
- However, evidence of the various attempts at proving eligibility must be retained in the client file, including a **notarized statement** signed by the potential applicant indicating that the applicant has no other proof of income.

vi. **Income Limits.** The Subgrantee must use annually published income eligibility guidelines to determine a household's income eligibility. The household's gross monthly income must not exceed the published monthly income limit by household size. The LES system is updated annually to reflect current income guidelines. Subgrantees are notified annually of updated Income Eligibility Guidelines by LHC via a LIHEAP Notice.

D. Citizenship

An applicant must be a citizen of the United States, or a permanent legal resident who is eligible for federal benefits to be eligible for LIHEAP benefits. A household with **only** ineligible aliens **does not qualify** for LIHEAP assistance. Subgrantees must allow applicants who challenge the denial to provide verification that they are eligible for benefits.

1. Verification of U.S. Citizenship or Nationality

Copies of one of the following documents, combined with acceptable proof of identity, will establish a person's U.S. citizenship or nationality for purposes of LIHEAP benefits:

- Birth certificate showing birth in one of the 50 states, the District of Columbia, Puerto Rico (on or after 1/13/41), Guam, the U.S. Virgin Islands (on or after 1/17/17), American Samoan, and Swain's Island, or the Northern Mariana Islands, unless the person was born to foreign diplomats in the U.S.
- Social Security Card
- U.S. Passport
- Copy of Medicaid or Medicare card
- Documentation from U.S. Department of Immigration and Naturalization
- INS Temporary Work Permit

2. Federal Public Benefits under the Welfare Reform Law, "Non-Qualified Aliens" Interim guidance verification of citizenship, qualified alien status, and eligibility under Title IV of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA).

- Non-qualified aliens are eligible to receive **certain assistance and services** under the LIHEAP, if they meet other program requirements. For example, non-qualified aliens may receive benefits in a cooling or heating center set up to provide relief to citizens in a time of disaster.
- In the case of the "certain assistance and services", proof of eligibility of any applicant is not required for non-profit charitable organizations.
- Direct LIHEAP household benefits are considered Federal public benefits and are subject to qualified alien verification requirements.

3. Undocumented Household Members (Non-Qualified Aliens)

Undocumented household members do not qualify for LIHEAP benefits and must **not be counted in the household size**; however, their **income must be counted** to determine Income Eligibility of the Household.

Subgrantees' are required to include undocumented household members on the application, along with their monthly income. Undocumented household members should have **a check mark** placed in the **"Uncounted"** field in the LES system. The LES system will perform the household size and income calculation per LIHEAP guideline requirements.

E. Vulnerability (Responsibility)

Vulnerability means having full or partial payment responsibility for the charges incurred to a **residential household account** owned by an energy vendor for heating and cooling costs. If an applicant is not fully or partially responsible for household energy costs, they are not eligible for LIHEAP service. ***Subgrantee must verify and document each applicant's vulnerability.***

NOTE: LIHEAP Service must **never be provided** to a business, commercial account, or to a movable property with no permanent utility connection (i.e. vehicle, etc.).

1. Examples of Vulnerable Applicants

- A homeowner or individual who lives alone or shares living quarters with several other individuals but has responsibility for all or part of the heating and cooling costs.
- A renter whose energy costs are included as a part of the monthly rental amount and who can provide documentation showing energy costs and rent separately.
- Subsidized housing tenants who are responsible for and have incurred excess energy charges and whose Utility Allowance (UA) is less than the Total Energy Costs (TEC).
- A renter who lives in multi-housing units with a common energy meter and the heating and cooling costs are passed on to the individual as a part of the monthly rental amount.
- Renters with heating and cooling costs included as an un-designated portion of their monthly rent charge.

NOTE: Renters, who are unable to provide documentation that demonstrates monthly energy costs and rental cost separately, must have a **LIHEAP Landlord Verification Form for Utilities Included in Rent (Appendix L)** completed. Landlord must agree to pass on the benefit paid to the heating/cooling vendor in the form of a rent reduction for the tenant.

2. Verifying and Documenting Vulnerability

Subgrantee must verify each applicant's vulnerability for energy costs. Acceptable verification of vulnerability may include, but is not limited to, any one of the documents listed below (in addition to a copy of the energy supplier bill). A copy of the document provided to establish vulnerability must be retained in the applicant's file, along with a copy of the applicant's energy bill.

Examples of documents used to establish Vulnerability:

- Active Driver's License or State issued ID card with **the same address** as the service address. (If the addresses do not match, you cannot establish vulnerability, but can use this for Identification purposes only).
- Water Bill in client's name with the **same address**
- Property Tax Bill
- Voter Registration Card
- Original bill from **another** utility supplier which includes the household member's name, the residential address to which utility is delivered, (this is often referred to as the Service Address on the vendor bill), an account number, the month and year when the utility costs were incurred, and the total amount due. Bill must not be more than thirty (30) days old.
- A copy of the applicant's lease or a copy of a rent receipt that displays the name of the applicant and the service address.
- Any other written proof that the applicant is responsible for the residential household heating and cooling costs.
- A document that includes the applicant's name and address that matches the service address noted on the energy supplier bill.
- If the applicant **resides in subsidized housing** (Section 8 or any other government housing assistance program), a copy of the **full lease must be** provided. The amount of any Utility Allowance received by the applicant must be entered into the Utility Allowance space in the Energy Consumption portion of the application.

- Households with heating and cooling costs included as an undesignated portion of their monthly rent charge must complete a **LIHEAP Landlord Verification Form Included in Rent (Appendix L)**. Landlord must agree to pass on the benefit paid to the heating or cooling vendor in the form of a rent reduction for the tenant.
- A photocopy of any other written proof that the applicant is responsible for the residential household heating and cooling costs, attached to the Application for LIHEAP Assistance.

F. Active Energy Account

An **active energy account** is an account that has not been finalized (permanently closed) by the energy vendor. An applicant must show proof of an active account at the time of application. An active account may have been disconnected for non-payment, but has not been permanently closed by the vendor.

CHAPTER 4: HEATING/COOLING ASSISTANCE

4.1 Determining the Monthly Total Energy Cost (TEC) for Heating/Cooling Assistance

The LES data system shall use the applicant's total heating and/or cooling energy cost for at least a one-month period using an energy bill(s) with a **Payment Due Date not more than thirty (30) days old** to determine the Monthly TEC used to compute the energy assistance benefit.

Any energy (or fuel) costs incurred to heat or cool a home can be considered when determining the TEC for a household. The primary source of energy for cooling is electricity which operates air conditioners and electric fans. The primary sources of energy (or fuel) for heating are natural gas or propane. Electricity may also be used for heating purposes.

Residential energy costs from more than one fuel source (energy vendor) must be added together to determine the TEC for a month. However, the costs for the different fuel sources must be no more than thirty (30) days from the Payment Due Date on the bill. For example, both natural gas and electricity are used to heat a home in the winter. The cost of the natural gas and the cost of the electricity should be added together to determine the TEC. To compute the TEC for households with prepaid utilities, the Subgrantee must use the **Prepaid Utility Calculation Worksheet (Appendix M)**.

With the exception for crisis assistance, electric or gas bills can only be paid during the active assistance season. In accordance with the timeframe set forth in Section 1.1 of the approved LIHEAP State Plan for each program year, Cooling bills must be paid during “Cooling” season, and Heating bills must be paid during “Heating” season.

A. Total Energy Cost Calculation

To compute the TEC, **include** the following items found on the monthly bill or statement which make up the **current monthly energy cost**:

- Total current energy cost for cooling or heating the home (total energy usage including fuel adjustment cost)
- Taxes
- Any additional **mandated** charges or credits, such as Storm Restoration charge/credit, City/Municipal Franchise fees, Infrastructure fees, Customer charge, Public Service Commission (PSC) credits, Tank rental, Rider charge, Utility optional credit, etc

TEC Exclusions:

- Sewer assessment fees (Included on some city bills)
- Water assessment fees (Included on some city bills)
- Garbage assessment fees (Included on some city bills)
- Installment payments for appliances
- Security lighting fees (night watchmen)
- Late Fees
- Previous balances (arrearages) or carryover fees
- NSF Fees
- Tampering Charges
- **Levelized billing***
- Connect Fees
- Reconnect Fees
- Deposits or additional deposits
- Repayment plans/Payment arrangements required to be paid as part of monthly bill

***NOTE: Levelized billing cannot be used in the determination of TEC.**

B. Total Energy Cost for Persons With Utility Bill(s) With Credit Balances

If the energy bill being used contains a credit balance, the Subgrantee must first determine **the cause of the credit balance**.

Bills that contain a **credit balance due to client payments** should continue to be processed using the current monthly energy costs as stated above.

Examples of Credit Balances due to Client Payments:

- Prepaid utilities aka “Pay-As-You-Go”,
- Client payment advance or over payment,
- Levelized billing,
- Automatic Bank Account Draft, etc.

If the current monthly energy costs are **not** provided to a prepaid applicant (aka Pay-As-You-Go) by a utility vendor, then the Subgrantee must use the **Prepaid Utility Calculation Worksheet (Appendix M)** to determine the TEC.

On the other hand, an energy bill with a **credit balance due to any type of previous energy assistance (LIHEAP or another agency)** can be used to compute the Total Energy Costs (TEC), **but** the vendor with the remaining energy assistance benefit balance will not be eligible to receive a new benefit payment. In instances where there is a credit balance from **un-used energy assistance (LIHEAP or another agency)** on a bill, the applicant is **not eligible** to be served until the energy assistance credit on their account has been fully expended.

In order to determine the TEC for clients with different heating and cooling vendors, Subgrantees should use **both** gas and electric bills with a Payment Due Date that is no more than thirty (30) days old. For instances where the heating and/or cooling bill has a previous energy assistance benefit credit, the Subgrantee should calculate and enter into the LES system the Monthly Total Energy Cost and select “**Credit on Bill**” for the vendor with the credit. Selecting “Credit on Bill” will prevent that specific vendor from receiving a benefit payment for the client’s account.

NOTE: The Subgrantee should use both gas and electric bills for the same month to qualify clients when both are presented. The Subgrantee must not omit a Heating and/or Cooling bill with a previous energy assistance credit balance in order to qualify a client for assistance. This requirement will not disqualify a client from receiving Crisis assistance for either Heating or Cooling vendors, if acceptable verified documentation is received demonstrating an energy crisis.

Example:

Client comes in to qualify for **Heating assistance** and presents utility bills for both heating and cooling vendors with a Payment Due Date within the past 30 days of their application. The cooling (electric) bill has a TEC of \$115. Enter \$115 as the “Monthly Total Energy Cost”. The heating (gas) bill has a TEC of \$45. Enter \$45 as the “Monthly Usage” for this entry. The heating bill also has a credit balance of -\$300 from previously un-used LIHEAP Heating Assistance; therefore, “Credit on Bill” must be selected for this vendor. When the Subgrantee completes all necessary data entry and selects “Qualify” for this client, LES will return a message indicating the client is ineligible for Heating Assistance at this time. The Subgrantee must deny the client in the system, print the denial letter, and inform them they can re-apply once assistance is needed.

C. Total Energy Cost for Persons Receiving Utility Allowances

1. Utility Allowances and TEC

According to the U.S. Department of Housing and Urban Development (HUD):

- **Utility Allowance** – An estimate of the average monthly utility bills (except telephone) for an energy-conscious household. This estimate considers only utilities paid directly by the tenant. If all utilities are included in the rent, there is not a utility allowance. Utility allowances vary by unit type and are listed on the project's rent schedule or Housing Assistance Payments contract.
- **Utility Reimbursement** - The amount, if any by which the utility allowance for a unit exceeds the total tenant payment for the family occupying the unit.

Majority of applicants receiving Section 8 Assistance receive Utility Allowances; therefore, the Subgrantee must verify, as indicated below.

Households receiving a Utility Allowance for Heating or Cooling greater than the utility bill for that utility **are not eligible** for a heating or cooling benefit. The household must provide an energy bill to show an energy burden for the month of application.

Applicants 60 years or older are exempted from this requirement and verification is not required.

Excess Utility Charges - When subsidized housing applicants are only responsible for paying “excess utility charges” not covered by the Utility Allowance, the Subgrantee must use the amount of the “excess charges” to determine TEC. The Utility Allowance would not be necessary in this scenario.

2. Determining TEC with a Utility Allowance

$$\text{❖ Vendor 1 Energy Costs} + \text{Vendor 2 Energy Costs} - \text{Utility Allowance} = \text{TEC}$$

If the TEC is a negative amount, the household is not eligible.

The LES system is currently taking into account Utility Allowances when determining the TEC. If the applicant receives a Utility Allowance, the Subgrantee shall complete the Utility Allowance section of the LES application. That portion of the LES application automatically prevents entering Utility Allowance data for applicants 60 years old or older. The Utility Allowance should only be entered in one energy consumption file.

3. Verification of Utility Allowance

Subgrantee shall obtain support documentation that provides the amount of an applicant’s Utility Allowance. Support documentation includes, but is not limited to:

- HUD Form 50059
- HUD Form 50058
- HUD Form 52667
- Statements from public housing authorities

When reviewing housing documentation the Subgrantee is to determine if the applicant’s Utility Allowance is already calculated in the applicant’s Section 8 Tenant Total Payment (TTP), resulting in a lower Section 8 Tenant Rent (TR). This should not be confused with a utility reimbursement (a payment made to the applicant). It is possible an applicant may receive a Utility Allowance **and** a reimbursement. To provide for a more efficient application process, the Subgrantee shall:

- Notify the applicant of the requirement for support documentation at the time of appointment or application.
- Include the requirement to provide support documentation in all outreach materials.

4.2 Determining the Energy Assistance Benefit for Heating/Cooling Assistance

The applicant's energy burden is automatically calculated by the LES system based upon that LIHEAP year's approved Model Plan. The energy burden is the percentage of household income used for energy costs.

$$\diamond \text{ Total Energy Cost} \div \text{Monthly Income} = \text{Energy Burden}$$

The energy burden along with household size is used to determine the applicant's benefit amount. Households with zero income shall receive the maximum benefit payment allowed for their family size.

A. Additional Payment to Targeted Priority Groups

Those households that contain one or more members of the targeted priority groups shall receive an additional benefit of \$100. Targeted priority groups are:

- Persons 60 years or older
- Persons who are disabled
- Persons five years of age and younger

Verifying and Documenting Disability

Subgrantees shall obtain support documentation for verification of disability of all household members claiming a disabled status. Disability can be proven through the Social Security Administration, Veteran Affairs, Worker Compensation, or any other medical approved documentation.

Regardless of the number of priority members in one household, the household is eligible for **only one** additional **\$100** payment per household.

B. Frequency of Benefit Payments (Heating/Cooling Assistance)

Applicants may be eligible to receive one Heating and one Cooling LIHEAP benefit each Program year.

For example, if an applicant receives a benefit payment during the Heating season, they cannot receive another benefit payment until **the Cooling season begins**. The LES system will automatically prohibit a payment of a benefit for any application filed more than once for a season.

LHC reserves the right to make Supplemental Heating/Cooling Payments to clients in the same program year.

C. Subgrantee Errors Resulting in Overpayment/Underpayment

Overpayment or an ineligible payment made as a result of an error by the Subgrantee shall be corrected immediately by notifying LHC of the error. At LHC's discretion, the overpayment must be retrieved from the vendor or be absorbed by the Subgrantee. The Subgrantee may appeal the cost of the overpayment or ineligible payment to LHC.

Underpayment made as a result of an error by the Subgrantee shall be corrected immediately by notifying LHC of the error. If the payment was already made to the energy vendor, the application will need to be adjusted to calculate the remaining benefit so an additional payment can be made.

D. Reverse Payments Due to Applicant Error

Applicants, who have received an overpayment or ineligible payment as a result of their failure to provide accurate or correct information, whether intentional or non-intentional, shall have the overpayment reversed on their energy accounts through the energy vendor.

When a Subgrantee identifies an overpayment or ineligible payment due to applicant error, the Subgrantee shall notify and provide support documentation to LHC. LHC will give the applicant an opportunity to dispute the finding prior to reversing the benefit through the energy vendor. The applicant shall be advised of his or her right to appeal the reversing decision to LHC.

4.3 Delivery of Benefit for Heating/Cooling Assistance

Heating/Cooling assistance benefits are in the form of an energy payment made directly by LHC to the utility vendor. Subgrantees must complete an accurate client application and qualify clients to receive benefits in LES.

CHAPTER 5: CRISIS ASSISTANCE

In accordance with Section 2604(c)(1) of Public Law 97-35, the Crisis Intervention Program shall be administered by LIHEAP Subgrantees to provide energy crisis intervention to eligible low-income households whose social or economic hardships are compounded by a home heating or cooling energy crisis.

A crisis assistance benefit may be in the form of bill payment assistance, disaster assistance, or equipment repair/replacement. The total benefit cannot exceed the maximum benefit amount per household per the current year's Model Plan.

5.1 Crisis Bill Payment Assistance

A crisis exists when a household's energy source for heating and/or cooling has been disconnected or scheduled for disconnection, depleted, and there are insufficient resources to resolve the situation. A crisis may also include natural disaster events, public health emergencies, and supply shortage emergencies declared by state or federal government.

A. Eligibility

Requirements for the LIHEAP Crisis assistance benefits are:

- Proof of Identity
- Social Security Numbers
- Income eligibility determination
- Citizenship verification
- Vulnerability (Responsibility for the household energy account)
- Threatened or actual interruption of services or lacking a cooling/heating source
- Faced with a health and/or medical safety risk (applies to life threatening assistance)

B. Documentation

- To qualify, the applicant must have some type of Utility Vendor(s) documentation that demonstrates that:
 - ❖ A disconnection is scheduled,
 - ❖ A disconnection has already occurred,
 - ❖ Be without service, or
 - ❖ Be without a heating or cooling source.

- Applicants must have 30 days of previous usage documented at the service address.
- Applicants faced with a **health and/or medical safety risk** must be able to provide a doctor's statement to include their illness will be exacerbated with the loss of utility services.
- Propane Applicants or Prepaid Applicants (aka Pay-As-You-Go) who have less than 7 days of usage remaining may present a written estimate, **in lieu of a disconnect notice**, from their vendor that includes the cost and number of propane gallons/natural gas/kilowatt-hours needed to provide 30 days of usage or the propane minimum delivery amount. Subgrantees must use the **Prepaid Utility Calculation Worksheet (Appendix M)** to determine if the applicant is in a crisis and retain a copy of the completed document in the client's record.

C. Benefits

- The household can be eligible for Heating or Cooling, and Crisis assistance simultaneously.
- A household can receive only one crisis payment benefit during a 12-month period.
- The Crisis benefit payment should be for the amount of the allowable disconnect calculation, up to the maximum benefit.
- If the client's maximum benefit amount is not enough to **resolve the crisis**, documentation must be provided confirming how the difference has been resolved to allow for services to continue or service restoration to occur. This may include another source of funding, client payment, installment plan with vendor, etc.
- The crisis bill payment benefit will cover only the amount necessary to prevent disconnection or restore service.
- Crisis Calculation **Inclusions**:
 - Cost to maintain services
 - Reconnect Fees
 - Late Fees.
- Crisis Calculation **Exclusions**:
 - Tampering fees
 - Insufficient Fund (NSF) fees
 - Security Deposits

- Past Due Amounts not included in the Disconnect Amount
- Other utilities included in the bill (i.e. water, sewer, garbage, etc.).

D. Timelines

Section 2604 (c) (1) and (2) of Public Law 97-35 provide that assistance to resolve the crisis be delivered to the household within the following timelines:

- **Non life-threatening crisis**—Service shall be delivered within **48 hours** from the date of the completed application.
- **Life-threatening crisis**—Service shall be delivered within **18 hours** from the date of the completed application.
 - If the **health or safety risk** is due to illness or medical need, clients must provide documentation verifying the health or safety risk.
 - If the **health or safety risk** is from extreme weather conditions, either heat or cold, the Subgrantee may document the emergency with a print-out of the weather advisory documenting the emergency by utilizing an internet weather advisory site.

The Subgrantee shall respond quickly to all requests for crisis assistance to adhere to the federally mandated timelines listed above. Failure to adhere to the timeframes above may result in sanctions to the Subgrantee up to and including program re-assignment for those Subgrantees who have a documented history of non-compliance with the noted timelines.

LHC **requires** that **crises** be resolved with a **vendor pledge** or **payment** by the Subgrantee directly to the vendor, in the event a vendor **does not accept** a pledge (to be reimbursed to the Subgrantee by LHC).

If a utility vendor **refuses to accept a pledge**, and the Subgrantee **does not have funds** available to temporarily pay the benefit while awaiting LHC reimbursement, then crisis applications **may not be processed** for that utility vendor. **This utility vendor and applicant would only be eligible to receive Heating and/or Cooling Benefits.**

E. Processing and Approval

The Subgrantee shall initiate the LIHEAP application process for applicants seeking Crisis assistance in a timely manner and must use the **LIHEAP Crisis Assistance Form (Appendix N)**. The purpose of this form is to:

- Document the need for Crisis assistance and identify why they are in the Crisis situation; and

- To determine if the applicant is aware that they may eliminate the potential interruption of service by seeking a payment option from the vendor.

F. Delivery of Benefit for Crisis Bill Payment

Crisis bill payment benefits are in the form of an energy payment made directly by LHC to the utility vendor or Subgrantee (In the event a vendor does not accept a pledge, and the Subgrantee made payment.). Subgrantees must complete an accurate client application and qualify clients to receive benefits in LES.

5.2 Crisis Equipment Repair / Replacement Assistance

Equipment Repair / Replacement is the cost that may be incurred by a Subgrantee for providing replacement or repair to heating or cooling equipment which is needed to maintain the health and safety of the household.

The Equipment Repair / Replacement benefit is only available to homeowners that can show **proof of ownership**.

This benefit will be used in lieu of a Crisis bill payment, and applicants remain limited to one crisis benefit per year.

For example: If an applicant has been helped with a Crisis bill payment within the past year, they would not be eligible for an equipment repair or replacement.

Equipment Repair/ Replacement may include:

- Heating System Repair
- Heating System Replacement
- Cooling System Repair
- Cooling System Replacement

****NOTE: Energy Star-rated units are recommended for energy savings.**

The need for the Repair / Replacement must be documented and performed by a **licensed professional**. In the event that a system is unrepairable, any alternative solutions must be **pre-approved** by LHC.

Equipment Repair/Replacement benefits needed to resolve a Crisis situation will be processed using cost-reimbursement. A Subgrantee will be reimbursed for the costs involved with providing the service. This may include the cost of the equipment plus installation costs, if any, for the equipment provided, or the cost of a repair to a heating or cooling unit. The total reimbursement from

LIHEAP **may not exceed** the total amount for the service. The Subgrantee shall **obligate** the funds necessary to resolve the crisis situation in a timely manner. In the event the cost **exceeds** the LIHEAP benefit, additional resources must be documented to show how the remaining financial balance was met.

To receive **reimbursement** for the purchase of a Repair/Replacement benefit, the Subgrantee shall complete an application in LES with the Subgrantee's name listed as the energy vendor. The Subgrantee shall also submit to LHC documentation verifying the **need** and **purchase** of the service (i.e., receipt, repair invoices). Reimbursement shall be limited to those costs that are reasonable and customary and shall not exceed the maximum crisis benefit. The payment will be processed by the Subgrantee in the same manner as bill payment assistance.

If a service is needed to replace or repair an air conditioner, central air conditioning unit, a furnace, or a vented heater, an applicant **does not need** a disconnect notice.

5.3 Disaster Relief Benefits (In-Kind Benefits)

LHC use of LIHEAP Funding for Disaster Relief is based on LIHEAP regulations at 45 CFR 96.50(e).

Subgrantees may provide an in-kind benefit (in accordance with the Louisiana Disaster Relief Policy), not to exceed the maximum allowable crisis benefit per household, in times of disaster relief.

Impacted clients may be eligible for one in-kind/disaster relief benefit **and** one bill payment/equipment repair/replacement benefit per 12-month period.

An explanation of the disaster should be included in the applicant's record. The cost for disaster relief will be reimbursed to the Subgrantee. The Subgrantee should expend the funds necessary to resolve the crisis situation in a timely manner.

Allowable uses of LIHEAP funds to deal with crisis situations, particularly with respect to assistance for home energy related needs resulting from a hurricane or other natural disaster in areas included in a declared disaster area, include the following:

- Costs to temporarily shelter or house individuals in hotels, apartments, or other living situations in which homes have been destroyed or damaged, i.e., placing people in settings to preserve health and safety and to move them away from the crisis situation.

- Costs for transportation (such as cars, shuttles, buses) to move individuals away from the crisis area to shelters, when health and safety is endangered by loss of access to heating or cooling.
- Utility reconnection costs
- Repair or replacement cost for furnaces and air conditioners
- Insulation repair
- Coats and blankets, as tangible benefits to keep individuals warm
- Crisis payments for utilities and utility deposits
- Purchase and installation of fans, air conditioners, and heaters
- Purchase and installation of generators

All related activities must be pre-approved by LHC and will be targeted to areas covered by a **State-Declared or Presidentially-Declared Disaster (PDD) declaration**. Any additional eligibility and/or procedures related to administration of disaster funds will be communicated to Subgrantees through additional LIHEAP Guidance from LHC.

5.4 Unforeseen Circumstances

In the event that Supplemental funds are granted or available within the year due to unforeseen circumstances (i.e. **public health emergencies, etc.**), LHC reserves the right to develop a separate benefit matrix to deliver bill payment assistance that meets the need of the particular crisis based on the amount of funds awarded or still available. Applicants impacted by the crisis will be eligible for Supplemental funds in addition to eligibility for regular crisis assistance.

In the event of unforeseen circumstances (i.e. public health emergencies, natural disaster, etc.), LHC **reserves the right** to allow **past due balances** to be included in the crisis assistance benefit payment. This right will be implemented by LA LIHEAP Notice and with a defined period only.

CHAPTER 6: CLIENT EDUCATION (ASSURANCE 16)

Under Assurance 16 of the LIHEAP Statute, LIHEAP grantees are allowed to use a portion of their funds to provide services that encourage and enable households to reduce home energy needs and thereby reduce the need for energy assistance.

The term **client education costs** means costs associated with activities that support providing direct services to the eligible participant, including but not limited to, energy conservation activities which encourage and enable participants to reduce their home energy needs and thereby the need for energy assistance, including needs assessments, counseling, and assistance with energy vendors, and reporting regarding such activities.

6.1 Client Education Policy

Energy education shall be provided during the application process to eligible and ineligible households.

Subgrantees shall develop active, participatory energy conservation education activities.

Subgrantees are encouraged to use educational activities that can be carried out while the applicant is waiting for intake i.e. videos. Educational activities shall not create an undue burden on the applicant or the Subgrantee staff.

Services can include:

- Counseling
- Assistance with negotiations with energy vendors
- Outreach Activities
- Referrals to the Weatherization Assistance Program (WAP)
- Energy efficiency education materials

6.2 Client Education Activities

Per the LIHEAP Subgrantee Agreement, Section III (C) (1), Subgrantees must submit an annual Assurance 16 proposal with their signed contract. A copy of the **Assurance 16 (Client Education) Proposal Form** can be found on LHC's website. LHC will review the annual Assurance 16 proposal to ensure compliance with federal and state laws and departmental requirements. LHC may request additional information or documentation as necessary prior to approving the proposal.

Grant recipients must provide an end-of-year grant expenditure status report that details the type of expenditures and the number of families served. **LIHEAP Assurance 16 (Client Education) Household Tracking Report (Appendix O).**

All expenditures must be incurred during the program year and documentation must include copies of complete receipts and the cancel checks made to the vendor. Purchase orders and/or Quotes are not considered documentation and may not be used to verify purchases.

Any equipment purchased with Client Education funds must be placed in the Subgrantee's inventory control sheet and will be reviewed during on-site monitoring visits.

The following are examples of acceptable activities utilizing the Client Education funds:

- Energy Education: An educational plan or activity for customers that requires purchases of materials to conduct the training or activity, and the labor cost associated with this activity.
- Production or acquisition of DVDs, brochures, or pamphlets, the cost associated with the development or procurement of those materials, and the labor cost associated with this activity.
- Itineraries or flyers indicating an energy conservation training or conference, and the labor cost associated with producing and distribution of these flyers.
- Copies of newspaper, radio, social media, or television advertising cost related specifically to customer education and/or outreach, and the labor cost associated with preparation and distribution of these advertisements.
- Purchase and distribution of LED light bulbs and/or weather-stripping. Distribution must include information on the energy savings, and the labor cost associated with this activity.
- Purchase and distribution of energy kits, and the labor cost associated with procuring and distributing these products.
- Purchase of laptop computers, WI-FI hot spot equipment, purchase of USB type modems to use with laptops, purchase of portable printers to conduct off-site outreach to new clients, and the labor cost associated with procuring these products.
- Outreach activities: Going out into the community and educating individuals about the LIHEAP and Weatherization programs, including

referrals to Weatherization. The cost of materials used during outreach, and the labor cost associated with this activity should be charged to the Client Education Program.

6.3 Client Education Pilot Programs

Subgrantees may receive funding for designing and implementing a project that would assist in moving applicants from dependency to self-sufficiency. The project should include a needs assessment, counseling, and assistance with energy vendors. At the end of the program year, a report will be required to show the impact of the activity on the number of households served, the level of direct benefits provided to those households, and the number of households that remain underserved.

CHAPTER 7: SUBGRANTEE FINANCIAL MANAGEMENT/INVOICE PROCEDURES

Use the following guidelines set forth in this chapter for budget preparation, program planning, program management, financial management, and expenditure control.

7.1 LIHEAP Cost Regulations

The following statutory and regulatory guidance has been provided by the Department of Health and Human Services as a basis for a State's definition of administrative and programmatic costs:

- A.** Section 2605(b) (9) of the LIHEAP statute requires grantees to assure that they will follow these requirements:

- ❖ 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
- ❖ 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));

- B.** The regulations at 45 CFR 96.50(e) state:

The Department recognizes that under the block grant programs the States are primarily responsible for interpreting the governing statutory provisions. As a result, various States may reach different interpretations of the same statutory provisions. This circumstance is consistent with the intent of and statutory authority for the block grant programs. In resolving any issue raised by a complaint or a Federal audit the Department will defer to a State's interpretation of its assurances and of the provisions of the block grant statutes unless the interpretation is clearly erroneous.

- C.** The regulations at 45 CFR 96.88(a) state:

Any expenditure for governmental functions *normally associated with administration in a public assistance program* must be included in determining administrative costs subject to the statutory limitation on administrative costs, **regardless of whether the expenditure is incurred by the State, a subrecipient, a grantee, or a Contractor of the State.**

- D.** The preamble to the block grant program regulations cited in 45 CFR 96.88(a) provided additional guidance (52 Federal Register 37961- 37964, published

October 13, 1987) regarding the Department's position on administrative costs in a cash assistance program such as LIHEAP, including the following:

....While we are not including the list of specific functions in the final rule, nonetheless, we believe that the costs associated with those functions, i.e., taking applications, determining eligibility and benefit levels, and monitoring the assistance provided, are normally administrative in a predominantly cash assistance program, such as LIHEAP. Consequently, we will carefully assess any other categorization of these costs in our compliance reviews and in our reviews of audit findings. We will continue to examine grantee programs on a case-by-case basis, looking in particular to other State programs that provide analogous benefits to determine the appropriateness of the State's definition of administrative costs for LIHEAP.

...We agree that outreach activities are not intrinsically administrative...The term encompasses activities that are administrative and others that are not.

7.2 Cost Allocation Plan

Subgrantees must develop a cost allocation plan to determine a consistent basis for charging indirect costs to LIHEAP. The cost allocation process should provide for a cost distribution method that **links** indirect costs to the direct services provided by the Subgrantee and then spread the cost of administration across all Subgrantee programs, and parishes if applicable, on a reasonable and consistent basis. The plan should be reviewed and approved by an auditor.

7.3 Direct and Indirect Costs

LIHEAP expenditures are comprised of direct and indirect costs. LHC and Subgrantees should assess their expenditures and assure that the expenditures are incurred and claimed in accordance with applicable federal and state regulations. It is strongly recommended that the parties consult with their auditor on all matters related to financial management.

Direct costs are those expenditures which are single program costs and benefit only LIHEAP. Direct costs may include, but are not limited to, salaries and fringe benefits of staff whose time can be clearly identified as working in LIHEAP (either full or part time).

Indirect costs are those expenditures which are not readily assignable only to the LIHEAP program. These may include, but not be limited to, shared management and administrative salaries, information technology, rent, utilities, and/or copying machines.

De minimis rate. Subgrantees that do not have a current Federal negotiated indirect cost rate (including provisional rate) may elect to charge a de minimis rate of **up to 15 percent** of modified total direct costs (MTDC). The Subgrantee is authorized to determine the appropriate rate up to this limit. Subgrantees are not required to use the de minimis rate. When applying the de minimis rate, costs must be consistently charged as either direct or indirect costs and may not be double charged or inconsistently charged as both. The de minimis rate does not require documentation to justify its use and may be used indefinitely. Once elected, the Subgrantee must use the de minimis rate for all Federal awards until the Subgrantee chooses to receive a negotiated rate. (2 CFR 200.414)

7.4 Administrative Costs

The term **administrative costs** means costs necessary for the proper administration and management oversight of the Louisiana LIHEAP program, including all costs, both direct and indirect, associated with the general administration and coordination of the program; supportive services including accounting, human resource, and procurement; development of policies, goals and objectives; participant intake and eligibility determination; and monitoring.

All Federal funds used to administer LIHEAP activities (except for the costs associated with client education – Assurance 16) count against the 10% State limit and are considered an administrative cost.

Examples include:

- Salaries and benefits of staff performing administrative and coordination functions (fiscal, executive, and support);
- Activities related to intake functions, including eligibility determination, assessing income and benefit levels, and application processing;
- Preparation of program plans, budgets, and schedules;
- Monitoring of programs and projects;
- Fraud and abuse prevention;
- Procurement activities;

- Public relations;
- Services related to accounting, litigation, audits, management of property, payroll, and personnel;
- Costs for goods and services required for administration of the program such as the costs for supplies, equipment, travel, postage, utilities, and rental of office space and maintenance of office space, provided that such costs are not included as a direct administrative cost for providing program services (**See Section 7.5**);
- Travel costs incurred for official business and not included as a direct administrative cost for providing program services (**See Section 7.5**);
- Uniforms for administrative personnel in support of LIHEAP services, as well as LIHEAP Coordinator expenses that exceed uniform thresholds, if needed;
- Trainings and/or Meetings related to national organizations, fiscal training, strategic planning, and overall staff development;
- Management information systems not related to the tracking and monitoring of LIHEAP requirements (e.g., for a personnel or payroll system for staff); and
- Preparing reports and other documents.

7.5 Program Support Costs

The term **program support costs** means actual costs that are non-administrative in nature but are for activities directly related to outreach, information resource and referral, case management and crisis service necessary to serve eligible households.

It includes costs of providing diversion benefits and services, providing program information to clients, screening and assessments, development of employability plans, work activities, post-employment services, work supports, and case management. It also includes costs for contracts devoted entirely to such activities.

It includes the salaries and benefit costs for staff providing program services and the direct administrative costs associated with providing the services, such as the costs for supplies, equipment, travel, postage, utilities, and rental of office space and maintenance of office space.

It includes direct costs of providing program services which **are not strictly associated with intake and eligibility determination**.

Other federal sources may subsidize this non-administrative category without any effect on the allocation limit given by the State.

Examples include:

- Costs associated with program outreach, including dissemination of program information, information on and referral to other programs, taking applications, and staffing of outreach sites;
- Screening and assessments (**not eligibility determination**);
- Referrals to other agencies, assistance in budgeting for utilities, short-term case work, coordination of benefits on behalf of a household;
- Case work in response to a household's energy emergency, including all crisis related activities, such as intervention with utility companies, negotiation with township trustees or other agencies on behalf of a household;
- Salaries and benefits for staff providing **direct program services** and the direct costs associated with providing the services, such as the costs for supplies, equipment, travel, postage, utilities, rental and maintenance of office space;
- Costs associated with home visits (e.g. mileage, gas);
- Expenses related to maintenance of outreach sites;
- Trainings and/or Meetings related to case management, intake worker training, and LHC provided-training;
- Management information systems related to the tracking and monitoring of LIHEAP statutory requirements;
- Uniforms for LIHEAP Supervisors and intake workers **not to exceed more than \$150 per person per program year** (additional expenses for Coordinators would be allowable as an Administrative Cost); and
- Personal Protective Equipment (PPE) for direct personnel performing LIHEAP functions such as masks.

7.6 Client Education (Assurance 16) Costs

The term **client education costs** means costs associated with activities that support providing direct services to the eligible participant, including but not limited to, energy conservation activities which encourage and enable participants to reduce their home energy needs and thereby the need for energy assistance, including needs assessments, counseling, and assistance with energy vendors, and reporting regarding such activities.

LIHEAP funds used to **administer** Assurance 16 activities **count against the 10% State limit and are considered an administrative cost.**

Other Federal funds (such as CSBG funds) **may be** used to pay for the costs associated with administering Assurance 16 activities, **without counting against** the 10% State limit on the use of federal funds for planning and administration.

7.7 Source Documentation

LHC and Subgrantees shall maintain **source documentation** for all expenditures. The documentation shall be retained in a manner which provides for ready access during monitoring and audit reviews. LHC monitoring reviews will include, but not be limited to, comparing cost reports with related support documentation.

All requests for reimbursement must be documented and invoiced in accordance with each Subgrantee's LHC accepted Cost Allocation Plan, which must include Low Income Home Energy Assistance Program (LIHEAP/DHHS) and all other sources of funding for the Subgrantee. No invoices will be approved prior to the acceptance of a Cost Allocation Plan and Annual LIHEAP Budget, receipt of the Assurance 16 (Client Education) Annual Proposal, and submission of proof that the required insurance coverages have been met each year.

Subgrantees must maintain all supporting documentation to validate the details of all expenses requested for reimbursement on an invoice. Proof of obligation ("invoice") should be retained followed by proof of expenditure once paid, unless an acceptable explanation can be provided, as well as all detail for calculated figures (such as salaries).

All monthly invoice supporting documentation must be dated and related to the period covered by the invoice as much as possible within the Subgrantee's control.

No requests for reimbursements may be submitted in the next fiscal year's invoices for an expense that occurred in the prior fiscal year. This is a federal requirement that funds may only be expended for the grant period for which funds have been obligated.

Supporting documentation for **individual and/or aggregate expenditures under \$3,000** may periodically be requested by LHC while reviewing the invoice or during a desk review when Subgrantee detail is not clear within the invoice, or if an item is found to be questionable, while reviewing the invoice for payment.

Subgrantee must make any supporting documentation available upon LHC request for the following reasons:

- If detail is not entered into LES or the Subgrantee invoice detail worksheet, the Subgrantee may be required to make additional notes.
- If an item is still found to be questionable after review of the requested documentation, LHC will request clarification and/or justification in writing.
- If requested as part of a desk review and/or desk monitoring of the Subgrantee.

7.8 Invoice and Submission Requirements

Subgrantee shall submit expenditures and activities by entry into the web-based, LIHEAP Energy Software System (LES) for client services and administrative, program support, and Assurance 16 cost reimbursements.

All requests for reimbursement must be electronically (or hardcopy) signed and submitted to LHC in the LIHEAP Energy Software (LES) by the required reporting periods.

A. Client Services Invoices

Client Payment requests should be submitted to LHC **as they are approved following Second Level review**, regardless of the level of activity or amount of the expenditures. LHC will process payment once a week for the preceding week's submitted requests.

A Subgrantee's Client Payment Request equals certified applications that have been processed, reviewed, and submitted to LHC. All applications must contain the accurate information and supporting documents in the electronic submission in LES.

Upon final LHC approval, LHC's Accounting Team will transfer funds for benefits directly to the Utility Vendor on record for each client.

B. Administrative, Program Support and Assurance 16 Invoices (Reimbursements)

Monthly reimbursement requests should be submitted to LHC by **the fifteenth (15th) calendar day of the subsequent month** (or next business day following the 15th day) for the previous month.

Reimbursement expenses must be documented and supported by invoices/paid receipts, LHC accepted Cost Allocation Plan, personnel title and time, or other LHC accepted forms of documentation.

Requests for reimbursement of **an individual and/or aggregate expense over \$3,000**, excluding salaries and fringe benefits, must have LHC **pre-approval** with the monthly invoice submission for quality control measures.

NOTE: Subgrantees must request **pre-approval** from LHC for non-LHC provided training expenditures to ensure reimbursement and applicability to the LIHEAP program prior to invoicing. The LHC approval should be maintained with the Subgrantee's invoice supporting documentation. LHC will occasionally post memorandums in regards to allowable non-LHC training opportunities. The memorandums will serve as the necessary support documentation for the invoicing file.

The following items must be uploaded as an attachment to the related invoice in LES:

1. LIHEAP Invoice Agency Details Worksheet **or** an LHC approved format detailing Subgrantee expenses and cost allocation
2. Monthly General Ledger demonstrating segregated LIHEAP expenses
3. LHC pre-approval for individual and/or aggregate expenditures **over \$3,000** (excluding salaries and fringe benefits)

NOTE: Subgrantees on Low-Risk or High-Risk Probation may be subject to additional invoice back-up requirements on a monthly basis.

LHC will review all requests for completeness and that costs are reasonable, allocable, and allowable.

In the event an expense is found to be unsupported or ineligible for reimbursement, the Subgrantee will be notified in writing and given the opportunity to correct the invoice prior to LHC adjustment of the invoice.

Upon final LHC approval, LHC's Accounting Team will transfer funds for reimbursement to the Subgrantee directly.

7.9 Reimbursement Requirements for Ineligible Expenses

Should a Subgrantee be reimbursed or otherwise compensated for any ineligible activity or expense, the Subgrantee shall reimburse LHC an amount equal to the payment made for the ineligible activity or expense.

7.10 Budget Revision Provisions

In an effort to ensure Subgrantees meet performance benchmark requirements set forth in the LIHEAP Subgrantee Agreement, budget revisions may be requested to move funds between allocations. Funds may be moved into and out of allocations according to the **LHC LIHEAP Budget Revision Matrix** found on LHC's website.

Funds associated with these allocations have limitations per DHHS requirements, and revisions resulting in increases may cause the State to exceed the authorized amounts for the specified fiscal year.

Subgrantees must submit their requests on **LHC's LIHEAP Budget Revision Form**, which can be found on LHC's website. Subgrantees must submit an executed Budget Revision Form via email to the LHC Energy Assistance central inbox with a cc: to the assigned LHC staff member for processing. Once LHC has completed the budget revision, LHC will execute the form and email a copy to the Subgrantee for their records.

7.11 Equipment Purchases

Individual and/or aggregate expense items over \$3,000 require written LHC pre-approval prior to request for reimbursement. Expenses may include vehicle maintenance, bulk purchase, client education purchases, computer equipment, etc.

Acquisitions that require prior LHC approval must not be invoiced for until a Subgrantee has received a written approval from LHC.

A. Vehicles and Equipment Cost Category Requirements

Vehicles and Equipment means tangible, nonexpendable, personal property having a useful life of more than one year and a per-unit acquisition cost of \$10,000 or more. A Subgrantee may use its own definition of vehicles and equipment provided that such definition at least includes all equipment defined above.

B. Vehicles and Equipment Purchases \$10,000 and Over Guidance

The regulations and guidance that include the requirement for approval for purchase of vehicles and capital equipment greater than \$10,000 are as follows (2 CFR 200):

For approval of Vehicle and Equipment Purchases, the following information must be submitted to LHC for review:

1. Name of requesting Subgrantee
2. Where the vehicle, or other equipment, will be used and how it will be used – Specify, full or part time use in the Low Income Home Energy Assistance Program
3. A statement of whether this is a new or replacement vehicle. If this is a replacement, how is the trade-in being addressed?
4. Brief description of how the procurement will be done and confirmation that Subgrantee, State and Federal procurement guidelines will be met or have been met.
5. What the funding source(s) will be [i.e., include the allocation – not just the title “LIHEAP Funds,” and also state the budget category that will be charged.] **Administration is the only allowable option for vehicle purchases.**
6. Copies of bid specification sheet (vehicle or equipment) that includes a description with options requested and quotes received. (Must have a minimum of three (3) quotes. For state and local governments, certification that proper procurement procedures were performed by your government’s fiscal/procurement division in accordance with all federal, state and local regulations.)
7. A statement that the lowest bid will be selected, or a sufficient justification of the “best value selection” if lowest bid is not recommended for LHC approval.

LHC should approve the request within **ten (10) business days**, pending all of the minimum information is adequately provided. If extenuating circumstances arise, LHC will follow-up within ten business days requesting additional details on the purchase.

Once all required documentation has been received, LHC will complete their review for approval/denial. Upon LHC approval or denial, LHC will send copies of all written approvals/denials to the Subgrantee. If approved, LHC will instruct the Subgrantee to proceed with the purchase or lease. If additional information is required, LHC will request the information from Subgrantee. The Subgrantee

must supply the information **within 5 business days**. If denied, the Subgrantee cannot proceed with the vehicle/equipment purchase or lease.

7.12 Advances

A. Approvals

Advances will be addressed on a case-by-case basis. Advances may be awarded if the following conditions are met:

- All other contractual obligations are met
- All monthly Requests for Reimbursements that are due have been submitted to LHC in LES
- Other performance and reporting requirements have been met.
- The Subgrantee submits a written request for an advance in writing to LHC.
- The amount of the advance is reasonably expected to be expended within 60 days.

No advances for the fiscal year will be awarded within the last three month's cost reports of the fiscal year or after the end of the fiscal year.

After LHC processes the final cost report for a given fiscal year, the unreconciled balance will be due to LHC upon termination of the contract or within 15 days of notification from LHC, whichever comes first.

B. Reconciliation

If a Subgrantee receives an advance, advance expenditure tracking and reconciliation is based on monthly reported expenditures.

LHC will calculate and track the following:

- Total Amount of Advance
- Expenditures per month as reported on the Subgrantee's invoice
- Reconciliation of each month's worth of expenditures less Advance balance (an amount up to 100% of monthly invoice request until entire Advance is reconciled to actual expenses).

The reconciliation of each month's expenditures is a rolling target, until the Subgrantee has reconciled all Advance funds received as follows:

1. If the reconciliation of one month's worth of expenditures less the remaining balance of the Advance is **positive**, the Subgrantee's actual expenditures have been reconciled up to the advance amount. The positive amount left after reconciliation of the invoice may be reimbursed (unless there are other issues to clarify prior to approving the invoice for reimbursement).
2. If the reconciliation of one month's worth of expenditures less the remaining balance of the Advance is **negative**, the Subgrantee's actual expenditures have NOT been reconciled up to the advance amount, and full reimbursement cannot be made. **These invoice requests will result in a \$0 reimbursement amount after reconciliation.**

7.13 Subgrantee Refund Procedures for Returned Benefits for Closed Accounts

Utility Vendors may return client refund checks/payments to LHC or a Subgrantee for the following reasons:

- Client no longer resides at the service address,
- Account has been closed, or
- Wrong utility vendor was selected.

All refunds should be directed to LHC. Funds returned from utility vendors directly to Subgrantees should be returned to LHC no later than 30 days upon receipt by the Subgrantee.

Upon receipt of a check from a vendor, the Subgrantee will make a copy of the check received from the vendor. The Subgrantee will verify the name of the client whose benefits were not delivered and the allocation from which each client was served and complete the **LIHEAP Vendor (Client Assistance) Refund Report (Appendix P)**.

A copy of the Vendor Refund Report, a copy of the vendor's check, along with a check made payable to LHC will be sent to LHC to the attention of **LHC Accounting Department**. If the amount of the check received from the vendor differs from the amount of funds accounted for on the Vendor Refund Report, the list of customers, and/or intended benefits, the Subgrantee must provide an explanation detailing the reason(s) for the difference in the two amounts.

CHAPTER 8: SUBGRANTEE COMPLIANCE MONITORING

8.1 Grantee Requirements

LHC, as the State Grantee, conducts annual on-site compliance monitoring visits to Subgrantees and periodic desk monitoring. LHC will notify the Subgrantee in writing and coordinate the on-site visit or desk monitoring with the Subgrantee. The purpose of the visit is:

- To assure compliance with federal, state, and local regulations
- To verify the files are maintained properly and contain required documentation for the applicants;
- To determine all expenditures are reasonable, allocable, allowable, and traceable;
- To perform client file testing/sampling for eligibility and benefit determination;
- To establish if there is a need for program training and/or technical assistance;
- To verify the Subgrantee is servicing all priority groups;
- To confirm the Subgrantee has fully expended the allocated funds for the program year in a timely manner;
- To ensure the Subgrantee has met the annual audit requirements, and submitted a copy of the audit to LHC in a timely manner.

8.2 Subgrantee Items to be reviewed

LHC will review Subgrantee policies regarding their adherence to federally-mandated and State-mandated policies relative to the administration of the benefit process, which includes, but is not limited to:

- Outreach to priority populations;
- The written guidelines regarding how the Subgrantee handles applicants from first inquiry to the completion of the application process;
- Compliance with the Crisis Application timelines;
- A review of client education material that is made available and distributed to applicants;
- The documentation of training on the LIHEAP application process for employees;

- Reimbursement invoices and supporting documentation;
- Subgrantee General Ledger;
- Compliance with Minimum Wage laws;
- A review of a random sample of applicant files to verify the collection of required support documentation from eligible applicants, including income, vulnerability of the client for the cost of the energy bill, confirmation of residence at the service address indicated on the bill, copies of Social Security Cards or other government documents that contain social security numbers for each member of the household being served;
- Written policies and procedures to detect, minimize, and eliminate waste, fraud, and abuse;
- Written policies that prohibit discrimination in both service delivery and Subgrantee employees;
- Compliance with the Americans with Disability Act (ADA) regulations for both applicant and staff;
- Client Confidentiality Policy;
- Record Retention Policy; and
- Subgrantee's policy for resolving internal grievances and appeals by both applicants and employees.

LHC shall continue to conduct on-going desk monitoring of Subgrantee reports, including: Request for Payments, Budget Tracking and LIHEAP Statistical Report.

LHC shall monitor the rate of funding expenditures by Subgrantees to ensure funds are delivered as benefits to eligible applicants in a timely and efficient manner.

8.3 Selection of Files

LHC will select a sample of client files. The number of the sample will be based upon the Minimum File Sample chart below.

Number of Clients Served	Minimum File Sample
100 or fewer	5 files plus 1 for each 10 clients over 50
101-1000	10 files plus 1 for each 50 clients or part of 50 over 100
1001-2500	20 files plus 1 for each 250 clients or part of 150 over 1000
Over 2500	25 files plus 1 for each 400 clients or part of 200 over 2,500

8.4 Performance Indicators

On-site reviews are intended to provide a measure for key aspects of administrative and fiscal operations. Performance indicators (or ratings) are assigned to each category and are used to determine and monitor Subgrantee compliance with LHC LIHEAP requirements. The performance indicators are as follows:

- Exceeds Standards (85-100)
- Meets Standards (70-84)
- Below Standards (55-69)
- Unsatisfactory (54 and Below)

The on-site review consists of five categories and each category is assigned a percentage of the score. Categories include:

- Service Delivery
- Client Eligibility and Benefit Determination
- Administrative Operations
- Management Policies and Procedures
- Fiscal Standards

Upon completion of the monitoring visit, LHC will notify the Subgrantee in writing of its findings and corrective actions. Should any additional training be required, LHC will work closely with the Subgrantee to coordinate the training for those program areas or any particular employees that may require special attention.

8.5 Non-Compliance with Requirements

Any non-compliance with a written Federal, State, or contractual regulation or statute may constitute a finding. All observations, recommendations, and/or

findings must be addressed by the Subgrantee as indicated in the Final Monitoring report. The Subgrantee must submit documentation addressing each citing in the Monitoring Report and a Plan of Corrective Actions within thirty **calendar (30) days** of receipt of the monitoring report.

8.6 Enforcement Action

Consistent or repeated violations of LIHEAP standards may require LHC to impose enforcement action upon a Subgrantee. The enforcement action will vary and will depend on the severity of the deficiency or deficiencies identified. The enforcement actions in order of least to most severe include:

- Low-Risk Probation
- High-Risk Probation (may include suspension of payments)
- Termination of LIHEAP Subgrantee Agreement

Placement of a Subgrantee into any one of these three categories is based upon the severity of the findings identified during the monitoring. Both Low- and High-Risk Probation will require additional oversight and training and technical assistance. In all cases, the Subgrantee will be notified in writing of the enforcement action being imposed.

A. Low-Risk Probation

Placement on Low-Risk Probation is typically associated with deficiencies that warrant additional attention to prevent more serious issues from developing. The Subgrantee will receive written notice that it is being placed on Low-Risk Probation and will be given a reasonable time period to correct the issues. Subgrantees may experience an increase in the number of monitoring events and/or the number of files reviewed by LHC during both on-site and desktop monitoring. The reasons for placing a Subgrantee on Low-Risk Probation may include, but are not limited to the following:

- When the Subgrantee fails to submit responses to findings in a timely manner as specified in LHC's monitoring reports
- When the Subgrantee has repeat concerns or observations
- When LHC determines that there are administrative issues within the Subgrantee Agency. For example, failure to provide adequate staff to handle customer applications in a timely manner
- When fiscal errors exist and supporting documents are occasionally missing.
- When eligibility documents are not consistently being collected.

- When the Subgrantee's practices are contrary to Federal and State guidance.
- When inconsistencies in intake processes exist.

B. High-Risk Probation

Depending on the severity of observations/findings, the Subgrantee may be placed on High-Risk Probation. High-Risk Probation may or may not include suspension of payments. The Subgrantee will receive written notice that it is being placed on High-Risk Probation and will be given a reasonable time period (not to exceed 120 days) to correct the issues. The notice will include the cause for probation and additional instructions to assist the Subgrantee with achieving compliance. The Subgrantee will also receive additional monitoring events and/or on-site training and/or on-line training from LHC, if deemed necessary. The reasons for placing a Subgrantee on High-Risk Probation may include, but are not limited to the following:

- When the Subgrantee has repeat findings
- When there is turnover of key staff members which results in sub-par performance
- When the Subgrantee fails to comply with the corrective action instructions that were submitted following the previous monitoring visit
- When the Subgrantee is unable to trace or account for funds received or supporting documents are always missing
- When eligibility documents are rarely being collected
- When the Subgrantee fails to return funds within the timeframe demanded by LHC due to funds not being expended in accordance with contractual or regulatory guidelines

C. Termination of the Program

For further guidance, please see the **LIHEAP Subgrantee Agreement, Section IX. Noncompliance with Requirements of This Agreement.**

CHAPTER 9: FRAUD, WASTE, AND ABUSE PREVENTION

Fraud occurs when an Applicant knowingly and willingly provides false information about their circumstances in order to receive assistance. Fraud also occurs when an Applicant intentionally fails to report changes in household circumstances in a timely manner that may impact their continued involvement in case management programs. Fraud may also exist internally when Subgrantee employees falsify information related to any LIHEAP activity.

9.1 Subgrantee Responsibilities

Subgrantee must:

- Treat every client with courtesy and respect.
- Have a Fraud, Waste, and Abuse Prevention Policy. The policy must include language on the detection, handling and resolution of applicant and employee fraud.
- Advise every applicant of the potential consequences of submitting false, misleading, or incomplete information during the application process with the intent to receive or increase the amount of an energy assistance benefit in accordance with Service Delivery Guidelines.
- Service clients in the order they are received without conflict of interest.
- Require and collect the documentation necessary to verify program eligibility from each applicant.
- Report to their appropriate supervisor, any and all actions, statements, documents or any other information they may become aware of, no matter the source of that information, which may result in or has resulted in an applicant receiving a benefit or benefit amount for which they were not eligible for.
- Collect and preserve any document that was used or that was attempted to be used by an applicant applying for a benefit.
- Be able to document the details of any incident of suspected fraud.
- Be aware of and recognize potential fraudulent activities that may include but are not limited to:
 - Attempting to increase a calculated benefit by inflating the number of family members living in the household.

- Attempting to increase benefits by under reporting household income during the application process.
- Attempting to receive benefits for an account for which the applicant has no responsibility/vulnerability.
- Attempting to receive a benefit for an ineligible residence (for example, a residence not occupied by the applicant)
- Attempting to receive a benefit by presenting altered or false documentation. For example, couples pretending to be tenant and landlord, making up a fictitious tenancy.

9.2 Employee Responsibilities

When fraud is suspected, the Subgrantee employee must:

1. Utilize the **LA LIHEAP Assurance Statement** provided by LHC as part of the application process to advise applicants they are subject to prosecution under various state and federal laws if they intentionally provide inaccurate, incomplete, or false information to receive benefits under the LIHEAP program.

Point out the provisions regarding possible prosecution for filing false information to the applicant prior to the signing of the application. Complete all signatures and dates. Do not initial.

NOTE: Applicants may be questioned about documents that are being providing; however, Subgrantee employees should never accuse any applicant of fraud.

2. Report **suspected** fraudulent activity immediately according to the Subgrantee Fraud, Waste, and Abuse Prevention Policy.
3. Complete the **LHC Suspected Fraud Incident Report Form** as instructed.

9.3 Management Responsibilities

When alerted of suspected fraud, Subgrantee management must:

1. Address suspected fraudulent activity immediately according to the Subgrantee's Fraud, Waste, and Abuse Prevention Policy.
2. The Subgrantee must complete the following forms:
 - **Suspected Fraud Incident Report form (Appendix Q)**

- **Witness Narrative Report form (Appendix R)**

3. Management must investigate within reason and document the applicant's file to determine if fraudulent activity actually occurred **versus** applicant error.
4. If the investigation determines that fraudulent activity did indeed occur, then the following steps may follow depending upon the time of discovery:
 - a. If it is determined that it appears that false information was provided during the application process, the applicant file must be denied and the client notified in writing.
 - b. If it is determined that the client received benefits based on false information provided by the client, it is considered an overpayment. The Subgrantee should attempt to recapture the funds and the client must be given an opportunity to repay the funds in question by either reimbursement to the Subgrantee/LHC or recoupment from the Utility Vendor.

If the client makes contact with the Subgrantee, payment arrangements may be discussed and formalized per the Subgrantee's policy. The Subgrantee should track all payments and notify the client when the obligation has been met.

9.4 Investigation and Prosecution

Fraud is considered theft and a crime; therefore, the Subgrantee should report the criminal activity to the LHC, State Inspector General, US DHHS Inspector General, and the local law enforcement agency.

Once every attempt has been made to contact and work with the client for recovery of overpayments and the client has been unresponsive or uncooperative, the information should be turned over to local law enforcement.

The Subgrantee should continue to work with the prosecuting officials, and the Subgrantee can, if requested, receive and track repayments from the client. All repayments must be returned to LHC.

The Subgrantee must contact LHC and keep staff informed as to the progress of the investigation, the disposition, and if any funds will be returned.

9.5 Future Eligibility

Any applicant and/or client who commits fraud is ineligible to apply for LIHEAP services for **a minimum of 1 year** after the discovery of the fraudulent actions. This restriction applies to anyone living in the household at the time the fraud was committed and is requesting services for the same household.

APPENDICES: LIHEAP FORMS



LOUISIANA HOUSING CORPORATION
2415 Quail Drive, Baton Rouge, LA 70808
PHONE: (225) 763-8700
E-MAIL: e4@lhc.la.gov

LIHEAP CLIENT EDUCATION ANNUAL PROPOSAL – PY20____

1. DATE SUBMITTED:	2. DATE RECEIVED BY LHC:

3. AGENCY INFORMATION	
LEGAL NAME:	ADDRESS:

4. NAME AND PHONE NUMBER OF PERSON TO BE CONTACTED ON MATTERS INVOLVING THIS PROPOSAL:	
FIRST NAME:	LAST NAME:
PHONE: ()	FAX: ()
EMAIL:	

5. PARISHES AFFECTED BY PROJECT

6. PROPOSED PROJECT

7. PROPOSED PROJECT	
START DATE:	ENDING DATE:

8. FUNDING DETERMINED BY THE LIHEAP ALLOCATION FORMULA
\$

9. TO THE BEST OF MY KNOWLEDGE AND BELIEF, ALL DATA IN THIS APPLICATION ARE TRUE AND CORRECT. AUTHORIZED REPRESENTATIVE	
FIRST NAME:	LAST NAME:
TITLE:	TELEPHONE #: ()
SIGNATURE:	DATE SIGNED:

ANY AND ALL ENTITIES RECEIVING GRANTS FROM THE LHC LIHEAP CLIENT EDUCATION FUND SHALL BE REQUIRED TO SUBMIT A FINAL REPORT TO THE LHC OFFICES BY THE END OF THE PROGRAM YEAR (SEPTEMBER 30TH). ALL UNSPENT GRANT AMOUNTS MUST BE RETURNED TO LHC. RECIPIENT AGENCIES ARE SUBJECT TO AN AUDIT BY LHC.

NEED FOR ASSISTANCE:

OBJECTIVES:

NUMBER TO BE SERVED:

DOCUMENTATION:

LHC LIHEAP CLIENT EDUCATION ANNUAL PROPOSAL

BUDGET JUSTIFICATION

PLEASE GIVE A BRIEF EXPLANATION OF HOW THE FUNDS WILL BE USED.



FORMAT FOR LIHEAP APPLICANT RECORDS

Required Documentation for Heating/Cooling Eligible Applicants

- LIHEAP application signed by both the applicant and an agency representative.
- Documentation of Social Security Number Verification (See Section 3.6)
 - **Applicant:** Copy of the social security card.
 - **All other Household Members:** Copy of the social security card, unless they meet the exception.
- All cards and/or documents must be legible.**
- A government or state issued photo I.D. – Applicant and all Household Members. **All copies must be legible.**
- Proof of income for all household members (as applicable)
- Verification of Employment (if applicable)
- Documentation to support Vulnerability (Responsibility)
- Verification of Citizenship
- Verification of Active Energy Account
- Verification of Utility Allowance (if applicable)
- Verification of Disability (if applicable)
- Copy of the Notification of Eligibility Letter

Required Documentation for Crisis Eligible Applicants

- LIHEAP application signed by both the applicant and an agency representative.
- Documentation of Social Security Number Verification (See above)
- A government or state issued photo I.D. – Applicant and all Household Members. **All copies must be legible.**
- Proof of income for all household members (as applicable)
- Verification of Employment (if applicable)
- Documentation to support Vulnerability (Responsibility).
- Verification of Citizenship
- Verification of Active Energy Account
- Documentation such as a disconnect notice, or other documented information confirming there is an actual service interruption at the time of application
- Documentation to support a claim of a Life Threatening situation, if needed
- If the crisis is due to the need for a repair or replacement of A/C or furnace, the file must contain copies of the invoices to support purchase, installation, or repair of equipment
- Completed LIHEAP Crisis Assistance Form
- Copy of the Notification of Eligibility Letter

Required Documentation for Ineligible Applicants/Denied Files

- Denied files should contain all the required documentation for a regular application (Heating/Cooling/Crisis) in order to justify the denial.
- Copy of Denial Letter

**Client Records whether stored electronically or hardcopy must be clearly labeled and identifiable.
Records shall be maintained exclusively for LIHEAP by Applicant.**

SUBGRANTEE LETTERHEAD

[Date]

[Applicant's Name]

Address

City, State, Zip]

Subject: Appeal Decision Concerning LIHEAP Benefits Denial

Dear [Applicant's Name]:

This letter is in response to your [DATE] appeal of your application denial for LIHEAP assistance. Your appeal was completed by this agency on [DATE]. Based upon the information presented with your appeal, our agency has come to the following determination:

_____ Reversal of LIHEAP application denial

Reason: _____

_____ LIHEAP application denial upheld

Reason: _____

If you are still not satisfied with this decision, you may make a written request for a Second Level Appeal to the **Louisiana Housing Corporation (LHC)**. The written appeal request should be submitted with an explanation of the issue on the back of the service application form under Right to Appeal and Fair Hearing with continuation on separate attached paper, if necessary. If the application form is unavailable, the applicant may state the request in a letter.

The written appeal request must be addressed to:

Louisiana Housing Corporation (LHC)
Attn: Energy Assistance
2415 Quail Drive
Baton Rouge, LA 70808

If assistance is needed, you may contact our office and request assistance with the preparation of your written appeal request to LHC.

The request must be received by LHC, or our Agency, or postmarked within **ten (10) business days of this decision letter**.

Sincerely,

[Subgrantee Appointing Authority]

[Title]



LIHEAP APPLICATION REQUIRED DOCUMENTS FORM

Provider: _____

Applicant: _____

Date of Application: _____

Thank you for applying for the Low Income Home Energy Assistance Program (LIHEAP). In order to complete your application, you will need to bring in the documents checked below **within the next ten (10) business days**. If these documents are not received by _____, your application will be determined incomplete and you will need to re-apply.

_____ U.S. State Issued Driver's License or
U.S. Government Issued Photo ID
(All household members age 18 and up)

_____ Social Security Card (All household members)

_____ Proof of Income (All household members)

_____ Disconnect Documentation (If Applicable)

_____ Utility Bill(s) dated within the past 30 days

_____ Verification of Utility Allowance (If Applicable)

_____ Verification of Disability (If Applicable)

Other: _____

Other: _____

Proof of Income may consist of one or more of the following:

_____ All Check Stubs within the previous 30 days

_____ Insurance or annuity payments

_____ W-2 Tax withholding statement

_____ Dividends & Interest Statement

_____ Most recent Tax Return (If Self-Employed)

_____ Net rent income

_____ Documentation of Unemployment Benefits

_____ Royalties

_____ Workers Compensation Benefits

_____ Periodic Receipts from estates or trusts

_____ Alimony

_____ Net game winnings

_____ Railroad Retirement

_____ Regular Contributions that are not loans to be Repaid

_____ Veterans Benefits

_____ Bank Statements

_____ Private Pensions

_____ Social Security Award Letter

_____ Government Employee Pensions

_____ SSI Award Letter

Other: _____

Other: _____

The Agency reserves the right to request additional documents or clarification for any reason deemed necessary.

Signatures: _____
Applicant Date

Agency Representative Date

LIHEAP Income Inclusion and Exclusion Chart

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Adoption Assistance	Financial assistance and medical coverage granted to an adoptive family to offset the short-and long-term costs of adopting an eligible child.		X	
Alimony	An allowance paid to a person by that person's spouse or former spouse for living expenses.	X		Court documents, written statement from person paying support, DHI form.
Annuities	A specified income payable at stated intervals for a fixed or a contingent period, often for the recipient's life.	X		Statement from investment firm, bank statement.
Cash Gifts - Irregular Contributions	Irregular cash gifts or payment on behalf of the household also includes loans and cash draw down on credit cards.		X	
Cash Gifts - Regular Contributions	Must provide regular support for an individual or for the household, paid directly to the household.	X		Written statement from person providing support, LHC form
Child Support	Money paid for the care of one's minor child.		X	
DHS Cash Assistance (SNAP in the form of cash assistance instead of food stamps) <i>See also Food Stamps.</i>	Cash assistance deposited directly into household bank account.		X	
Dividends	A sum of money paid to shareholders of a corporation out of earnings.	X		Letter from corporation declaring amount, bank statement.

LIHEAP Income Inclusion and Exclusion Chart

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Earned Income	Wages, Salaries, Commissions, Bonuses, Profit Sharing, Tips, Vacation Pay, Overtime Pay, Severance Pay, Sick Leave	X		Wage Stubs and/or statement from employer, verification from The Work Number
Earned Income Credit (EIC)	A tax credit for low income households.		X	
Employers paid fringe benefits	Health Insurance, retirement, etc.		X	
Energy Grants	Money received under last year's LIHEAP, or from private utility energy assistance programs.		X	
Federal Disaster Payments	Payments made by federal agencies under a presidential declaration of disaster.		X	
Food Stamps (SNAP) <i>See also DHS Cash Assistance.</i>	Assistance given under a federal program to eligible persons for food at designated grocery stores or markets.		X	
Foster Care	Payments made to foster families. Types of foster care: Family Foster Care, Special Rate Foster Care, Family Shelter Care, Relative Foster Care, Independent Living Program		X	
Foster Grandparents Program	A program for limited income people age 60 and older to serve as a role model, mentor and friend for a small stipend.		X	
Home Ownership Voucher Program	Section 8 home ownership program.		X	
Income Earned by household members still enrolled in high school	Income Earned by household members eighteen (18) and over, who are enrolled in high school.		X	
Income Earned by minors	Income Earned by household members under the age of eighteen (18).		X	

LIHEAP Income Inclusion and Exclusion Chart

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Income Not Counted By Law- Domestic Volunteer Service Act	Title I: Volunteers In Service To America (VISTA), AmeriCorps, University for Action (UYA), Urban Crime Prevention Program		X	
Income Not Counted By Law- Domestic Volunteer Service Act	Title II: Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Older Americans Service Program (Senior Health Aides, Senior Companions).		X	
Income Not Counted By Law- Domestic Volunteer Service Act	Title III: Service Corps of Retired Executives (SCORE) and Active Corps of Executives (ACE)		X	
Income Not Counted By Law- Title V of the Older Americans Act	Experience Works, Senior Health Aides, Senior Companions, Volunteer Respite care.		X	
Income Not Counted By Law – Title I of the Workforce Investment Act of 1998 (WIA)	Supportive services to WIA participants. Services include transportation, health care, child care, handicapped assistance, meals, temporary shelter, counseling, etc.		X	
Indian Per Capita Judgment Payments	Payments made to any tribe or group whose trust relationship with the Federal Government has been terminated and for which Legislation in effect before October 12, 1973 authorized the disposition of its judgment funds.		X	
Informal income	Income resulting from occasional sources such as yard work, child care, collecting bottles/cans, donating blood and/or plasma, etc.	X		Receipts, LHC and/or other local agency form(s).
In-kind Income	Food or rent received in lieu of wages; food or fuel value for working on farms.		X	
Interest	The sum of money paid to one for the use of their money	X		Bank statement (only if amount is over \$200, and is withdrawn).

LIHEAP Income Inclusion and Exclusion Chart

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Job-related expenses for non-self-employed applicants	Business expenses comparable to self-employment, such as a sales person, truck driver, cab driver, or mechanic.		X	
Job related Reimbursements	Job related expenses such as mileage, meals, uniforms, medical expenses, etc.		X	
Jury Duty Compensation	Income received from performing jury duty	X		Copy of check, statement from source, bank statement
Lump Sum – Non-recurring	Net Income from lump sum gambling and/or lottery winnings	X		Copy of check, statement from source, bank statement
Lump Sum – Non-recurring	Income considered of a nature not likely to occur or happen again (i.e. lump sum insurance payments, workers compensation settlements, sale of property, house or car, etc.)		X	
Military Pay	Benefits paid to a person who is serving in a military force.	X		Official document(s) stating amount (e.g. leave and earnings statement.)
Pensions	Assistance, paid at regular intervals to a person or to the person's surviving dependents in consideration of past services, age, merit, poverty, injury or loss sustained, etc.	X		Statement from source, bank statement.
Rebates & Refunds	Income Tax rebates and refunds		X	
Rental Income	Income received from rental properties or renting a room within a home.	X		Paperwork re: rental of property, receipts, bank statement, and/or other necessary documentation.
Retirement	A monthly payment made to someone who is retired from work.	X		Statement from source, bank statement
Reverse Mortgage	A mortgage in which a homeowner, usually an elderly or retired person, borrows money in the form of annual payments which are charged against the equity of the home.		X	
Royalties	A compensation or portion of the proceeds paid to an owner of a right, as a patent, oil or mineral right, for the use of it or an agreed portion of the income from a work paid to its author, composer, etc.	X		Statement from source, bank statement

LIHEAP Income Inclusion and Exclusion Chart

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Self-Employment Income (Business, Uber, Lyft, Food Carrier, etc.)	Income from a business, less business expenses.	X		Most recent federal tax returns, including 1040 and Schedule "C". Self-employment Self Certification Form (Appendix G), bank statements and any required supporting documentation.
Senior Companion Program	A program which offers an opportunity for volunteers aged 60 and over to provide companionship and support to homebound adults, most of whom are also seniors.		X	
SNAP (Food Stamps)	<i>(See Food Stamps.)</i>		X	
Social Security Benefits (SS, SSD, SSI)	A federally funded program of social insurance and benefits which include retirement income, disability income, benefits paid to minors, and death and survivorship benefits.	X		Official documentation such as award letter, benefit verification letter or annual letter from Social Security Administration (SSA), bank statement, or SNAP documents may be used.
Strike Benefits	Benefit from Union Action.	X		Copy of check, statement from Union.
Student Aid <i>(See also Work Study.)</i>	The full amount of all financial assistance paid directly to the student or to the educational institution. This includes: scholarships, grants, or loans.		X	
Temporary Assistance For Needy Families (TANF)	A program which provides assistance to needy families so that children may be cared for in their own homes or in the home of relatives.	X		Documentation showing amount of assistance.
Training Stipend	Income received from a training program by applicant.	X		Pay stubs


LIHEAP Income Inclusion and Exclusion Chart

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Unemployment Insurance	An allowance of money, usually weekly, to an unemployed worker by a state or federal agency.	X		Printout or statement from the employment office, check stubs.
Utility Reimbursements	The amount, if any by which the Section 8 utility allowance for a unit exceeds the total tenant payment for the family occupying the unit.		X	
Veterans Benefits	Benefits paid directly to a person who has served in a military force or a surviving family member.	X		Benefit award letter, correspondence from the VA office, benefit payment check, bank statement.
Women, Infant, and children (WIC) Program	Women, Infants, and children (supplemental food program)		X	
Workers Compensation	Compensation for time lost due to a work related illness or injury.	X		Check stubs, statement from Workers Compensation, bank statement
Work Study (See Student Aid.)	The Work-Study program helps to provide graduates and undergraduates with part-time employment during the school year by paying a portion of the student's salary.		X	

The "Proof of Income" table above is not exclusive. Other forms of verification may be approved by local agency.



LIHEAP VERIFICATION OF EMPLOYMENT

To Employer		From Agency	
Name		Name	
Address		Address	
Contact		Contact	
Phone		Phone	
Email:		Email:	

Applicant Name	
Social Security	

I hereby authorize release of my employment information to the above listed Agency.
Please complete the following page in its entirety.

Applicant Signature

Date

THE FOLLOWING SECTION TO BE COMPLETED OR VERIFIED BY EMPLOYER:

Employment Detail: Please provide the following information.

Employee Name:	Job Title:
----------------	------------

Employment Status: Complete the line that is applicable.

Is Employee Active:	Date of Employment:
Was Employee Terminated:	Date of Termination:

Frequency of Pay: Place an "X" in the space that is applicable.

Hourly	Weekly	Bi-Weekly	Bi-Monthly	Monthly	Annually	Other
--------	--------	-----------	------------	---------	----------	-------

Pay Information: Please provide current (active employees), future (new hires), or past information (recently terminated) for employee.

Last (4) Pay Periods	# of Hours Worked	Hourly Pay Rate	# of Overtime Hrs.	Gross Pay	Date of Check	Year to Date Earnings	Is Overtime Regularly earned?

Are you aware of any other compensation this person may be receiving at this job that is not listed above? If yes, explain. _____

I certify that, to the best of my knowledge and belief, the information provided on this form is true and accurate.

Employer's Signature

Employer's Printed Name

Employer's Phone Number

Fax Number

Use this form to **list the gross income, business expenses, and net income after business expenses** from your self-employed business. **Do not include any depreciation** as a business expense.

You must provide a copy of your most recent federal income tax return with all accompanying schedules for the most recent year ending December 31st. If self-employment recently began, the tax return has not been filed, or it is after April 15th, you must also complete this form attesting to current monthly earnings and losses supported by the corresponding bank account statements.

- 2. Give the time period covered by this income statement.**

- 3. Describe what you did to earn this money:**

- 4. List your business income and expenses (IMPORTANT: Attach copy of bank statements, or other verifying papers).**

DATE	EXPENSES	AMOUNT
		\$
TOTAL SELF-EMPLOYMENT EXPENSES		\$

[illegible]

The above information is true, correct, and complete to the best of my knowledge. I understand that giving false information to receive assistance from the Louisiana Low-Income Home Energy Assistance Program could result in fraud penalties.

Signature

Date _____

Signature

Date _____



Income Determination Worksheet

In the event the **LIHEAP Energy Software (LES)** system is down, the **Income Determination Worksheet** may be used to determine the monthly income for completing paper applications, until they can be entered into the LES for processing.

Part 1. Establish Earned Income. Enter verified income from the last 30 days for all employed household members 18 years of age or older on the table below. Enter on Line 1.

Check Stub	Pay Period Ending Date or Check Date	Gross Pay
1.		
2.		
3.		
4.		
Total		1. \$

Part 2. Obtain Average Earned Income.

Divide the amount on Line 1 by number of check stubs and enter the result on Line 2.

Note: If pay stubs were excluded due to fluctuations in earnings, divide by the number of valid pay stubs.

2. \$

Part 3. Conversion to Gross Monthly Income

Based on how often the applicant is paid, perform the appropriate calculation to obtain gross monthly income.	Frequency of Pay	Conversion Factor
	Weekly	Multiply Line 2 by 4.333
	Biweekly (every other week)	Multiply Line 2 by 2.167
	Twice a month	Multiply Line 2 by 2
Annually		Divide annual income by 12
Enter result of conversation on Line 3.		3. \$

Part 4. Establish Unearned Income. List each type and amount of unearned income in the table below. Enter total on Line 4. **Note:** If unearned income is not received on a monthly basis, use the appropriate conversion factor (see table above) to convert the amount to monthly.

Type of Unearned Income	Gross Monthly Amount
Total	4. \$

Part 5. Gross Monthly Income.

Add Lines 3 and 4 and enter the sum on Line 5. This is the gross monthly income.

5. \$

Part 6. Determining Eligibility. Use the figure on Line 5, along with family size, to determine an applicant's income eligibility, using the 60% of State Median Income.



LIHEAP ZERO INCOME STATEMENT FORM

Date: _____

I, (Full Name) _____, (SSN) _____

do hereby certify that I am unemployed and have no income for the following reason:

(check appropriate reason(s))

____ Laid off. Enter month and year of last date worked _____

____ The job I had was seasonal and has ended

____ I am unable to find employment

____ I have been or am (*circle one*) **sick** / **injured** and unable to return to work.

____ I expect to return to work by (month/year) _____

____ I have small children and no one to care for them except me.

____ My only source of income is from _____

____ I am no longer eligible for Unemployment Benefits.

____ I receive assistance from the La. Dept. of Social Services:

(*circle all that apply*) Food Stamps, TANF funds, OTHER: _____

____ Other (*Please use the space below to write any conditions that are not covered above.*)

I understand that if I knowingly give **incomplete**, **inaccurate**, or **incorrect** information I am subject to criminal prosecution under Title 18 of the U.S. Code.

Signature: _____

Client Signature

Agency Representative

NOTE: THIS FORM SHOULD BE COMPLETED FOR ALL ADULT HOUSEHOLD MEMBERS 18 YEARS OF AGE OR OLDER WHO REPORT ZERO INCOME.

Effective: April 1, 2026



LIHEAP ZERO INCOME SUPPLEMENTAL SHEET

APPLICANT NAME: _____

MONTHLY EXPENSES

SECTION 1: HOUSEHOLD MONTHLY EXPENSES

RENT/MORTGAGE	
FOOD PURCHASES	
AVG. ELECTRIC BILL	
AVG. GAS BILL	
AVG. WATER BILL	
SEWER/GARBAGE	
HOME TELEPHONE	
CELL PHONE	
CABLE/SATELLITE	
CLOTHING EXPENSES	
SCHOOL EXPENSES	
MEDICAL EXPENSES (NOT MEDICINE)	
PRESCRIPTION EXP	
TOTAL HOUSEHOLD	

SECTION 2: VEHICLE MONTHLY EXPENSES

CAR NOTE	
AUTO INSURANCE	
AVG. FUEL COST	
TOTAL VEHICLE	
TOTAL HOUSEHOLD EXP	
TOTAL VEHICLE EXPENSES	
OTHER (IF ANY)	
TOTAL EXPENSES	

MONTHLY INCOME

SECTION 3: MONTHLY INCOME

SELF EMPLOYMENT	
WAGES	
SSA	
SSI	
VETERANS PENSION	
UNEMPLOYMENT	
WORKMAN'S COMP	
RENTAL INCOME	
ALIMONY	
TANF CASH ASSISTANCE	
REGULAR CONTRIBUTIONS	
*FAMILY	
*FRIENDS	
OTHER	
TOTAL INCOME	

SECTION 4: EXEMPT INCOME

FOOD STAMPS	
AFDC	
CHILD SUPPORT	
OTHER INCOME	
TOTAL EXEMPT INCOME	

INSTRUCTIONS:

1. ENTER EXPENSES AMOUNT REPORTED BY APPLICANT IN SECTION 1 AND 2.
2. ENTER INCOME AMOUNTS IN SECTION 3 AND 4.
3. THE INTAKE WORKER MUST ASK APPLICANT FOR WRITTEN EXPLANATION OF INCOME SOURCES, IF ANY. (FOR EXAMPLE, ASK APPLICANT HOW THEIR EXPENSES ARE BEING PAID. THE INTAKE WORKER MUST DOCUMENT THE APPLICANT'S FILE WITH THIS INFORMATION UNDER SECTION 3 AND 4.)

***NOTE:** ALL REGULAR CONTRIBUTIONS RECEIVED FROM FAMILY AND/OR FRIENDS MUST BE DOCUMENTED ON THE STATEMENT OF CONTRIBUTIONS FORM, WHICH IS TO BE FILLED OUT, SIGNED AND DATED BY THE PERSON GIVING THE CONTRIBUTION.

I CERTIFY TO THE BEST OF MY KNOWLEDGE INFORMATION PRESENTED ABOVE IS ACCURATE.

APPLICANT'S SIGNATURE: _____ DATE: _____

AGENCY REPRESENTATIVE'S SIGNATURE: _____ DATE: _____



Louisiana Housing
Corporation

Agency Name: _____

Agency Address: _____

STATEMENT OF CONTRIBUTIONS

Date: _____

I, *(name of person making contribution)* _____

do hereby certify that I assist *(enter the name of the person being assisted)* _____

with monthly household expenses. Our relationship is *(check the appropriate box)*:

☐ I am a relative ☐ I am a friend ☐ Other: _____

The amount of my monthly contribution is \$ _____

Or

I assist with the following:

_____ A. Rent.....	Amount: _____
_____ B. Food	_____
_____ C. Utility Bills	_____
_____ D. Transportation	_____
_____ E. Medical Expenses	_____

TOTAL: _____

I understand that if I knowingly give incomplete , inaccurate , or incorrect information, regarding my assistance with the person named above, I am subject to criminal prosecution under Title 18 of the U.S. Code.

Contributor's Name: _____

Address: _____

City: _____ Zip: _____

PHONE NUMBER: () _____

Signature of Contributor: _____



LIHEAP Landlord Verification Form

HEATING AND COOLING UTILITIES INCLUDED IN RENT VERIFICATION

Applicant's Name _____

Address _____

Application ID# _____

Telephone Number _____

Landlord/Manager Name _____

Address _____

Telephone Number _____

Are heating and or cooling utilities included in the rent? _____

Are you disconnected for an overdue heating or cooling bill? _____

Are you in danger of disconnection for an overdue heating or cooling bill? _____

Is your heating/cooling bill past due? _____

Rental Unit's Monthly Heating Cost _____ Cooling Cost _____

How was this amount determined? (*Please provide support*) _____

I/We _____ (*Landlord(s) Name*) agree to offset the rent for
 _____ (*Applicant's Name*) in the amount of the total LIHEAP
 assistance benefit received on their behalf.

Landlord/Manager Signature _____

Date _____

SUBGRANTEE VERIFICATION (if applicable):

Subgrantee Verified Signature _____

Date Landlord/Manager contacted (if needed) _____



PREPAID UTILITY CALCULATION WORKSHEET

APPOINTMENT DATE:

CLIENT NAME

NAME OF UTILITY VENDOR

TYPE OF UTILITY (Circle One)

ELECTRIC

GAS

PROPANE

BUTANE

Previous Bill Date:

Previous Purchase Amount:

Current Bill Date:

Current Purchase Amount:

Number of Days Passed Since Last Purchase

Daily Usage (Last Purchase Amt/ # of Days Since Last Purchase):

30-Day Usage Amount (TEC):

(COOLING or HEATING Monthly Energy Usage Amount)

CRISIS DETERMINATION

Number of Days Available From Current Purchase Amount:

Number of Days Passed Since Most Recent Purchase

Number of Days of Energy **Remaining** at the Time of Appointment

NOTE: CLIENT MUST HAVE LESS THAN 7 DAYS OF ENERGY REMAINING AT THE TIME OF APPLICATION TO QUALIFY FOR CRISIS ASSISTANCE.

Crisis Clients may present a written estimate from a propane vendor that includes the number of gallons needed to provide 30 days of propane and the estimated cost (i.e. CRISIS BENEFIT). If a written estimate does not exist, Subgrantees must use the 30-DAY USAGE AMOUNT (TEC) as the CRISIS BENEFIT.

Prepaid Utility Calculation Worksheet Instructions

APPOINTMENT DATE This is the date of the client's appointment. If a client submits an application via email, mail, or dropbox, this will be the date the application is received. **DATE STAMP THESE WITH THE RECEIVED DATE.**

CLIENT NAME Enter the First and Last Name of the applicant.

NAME OF UTILITY VENDOR Enter the name of the utility vendor you are using the worksheet to determine their monthly Total Energy Cost (TEC).

TYPE OF UTILITY (Circle One) Circle the type of utility.

PREVIOUS BILL DATE Enter the date from the client's prior purchase shown on the client's utility documentation. This will be the date they previously received the utility type.

PREVIOUS PURCHASE AMOUNT Enter the amount paid, including all other energy related charges, for the purchase before the current purchase of the indicated utility type.

CURRENT BILL DATE Enter the most recent bill date shown on the client's utility documentation for the current purchase.

CURRENT PURCHASE AMOUNT Enter the amount paid or to be paid by the most recent bill date, including all other energy related charges.

NOTE: PURCHASE AMOUNT SHOULD INCLUDE THE FOLLOWING ENERGY RELATED CHARGES:

- * Amount to purchase the utility type
- * Environmental Fees (Ex. Hazmat Fees, etc.)
- * Leak and/or Line Test Fees
- * Taxes

The rest of the fields in the form are calculated, and do not require Subgrantee input.

30-DAY USAGE AMOUNT (TEC): Use this amount in the TEC field in the LIHEAP Cloud to determine the Heating or Cooling Benefit.

NUMBER OF DAYS OF ENERGY REMAINING AT THE TIME OF APPOINTMENT: If this amount is 7 days or less, the client may be qualified for a Crisis Benefit once every 12 months. Use the written amount provided by the Utility Vendor to provide 30-days of the utility as your Crisis Benefit. If a written amount does not exist, use the 30-DAY USAGE AMOUNT (TEC).



**Low-Income Home Energy Assistance Program (LIHEAP)
Crisis Assistance Form**

Provider Name: _____

Applicant Name: _____

Applicant Last 4 SSN: _____ **Number in Household:** _____

Application Date: _____ **Application Time:** _____ AM PM

Crisis situation is: (Circle One) Life-threatening Non-life-threatening

1. Energy service interrupted or lacks heating/cooling: (Circle all that apply)

- ☐ **Threatened interruption**
- ☐ **Actual interruption**
- ☐ **Lack of heating source**
- ☐ **Lack of cooling source**

2. Health and/or medical safety risk: (Circle one) **Yes No**

❖ Risk must be documented. Types of documentation include, but are not limited to, medical reports, caseworker reports and disconnect notices during times of extreme temperature.

3. Assistance Needed to Resolve the Crisis: (Check one)

___ Bill Payment Total \$ _____ = (LIHEAP _____; Client/3rd party _____)

___ Equipment Repair or Replacement Estimated Cost: \$ _____

Circle one: Heating System Repair
Heating System Replacement
Cooling System Repair
Cooling System Replacement

4. Description of Crisis Situation:

5. Delivery of Services:

Life-threatening (**18 hours**): Date _____ Time _____

Non-life-threatening (**48 hours**): Date _____ Time _____

Authorized Provider Signature _____ **Date** _____

Assurance 16 Benefits for LIHEAP Eligible Households Tracking Form

FY 20__

****This spreadsheet will be used to track total clients served, the amount of employee hours, the equipment purchased, and services rendered using Client Education funds. ****

This report is due annually by August 15th for the period covering August 1st – July 31st of the previous year.

Copies of all invoices must be submitted to support all expenditures. Detailed timesheets must be submitted to document time charged to the program.

[illegible]

Louisiana Housing Corporation
LIHEAP Request for Client Assistance Refund Deposit

Date Prepared	Payment Date	
LIHEAP Payments	See Data sheet for ALLOCATIONS	
Crisis Services		-
Non-Crisis Services		-
Monitoring		
GRAND TOTALS	\$	-
Program Specialist		
Program Mgr Approval	Date	
	Date	

LHC Refund	
Re Invoiced	
Purchase Order	
Total	0

[illegible]

Effective: April 1, 2026



WITNESS NARRATIVE REPORT

Date of Incident: _____ (if known)

Date of this form was prepared: _____

Name of Person preparing this statement: (*Please print*) _____

Name of applicant suspected of fraud: _____

Please complete the statements below:

I became aware of the incident when:

After being notified, I took the following actions:

I heard the applicant make the following statement(s):

I (*circle one*) observed did not observe the applicant sign all the required forms.

I (*circle one*) observed did not observe the intake worker, _____

Explain the potential for prosecution under US Title 18 to the applicant.

Signed: _____

Date: _____