

LIHEAP Program Basics (The Assurances)

PART 2

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LIHEAP Assurances 4-8

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Analyzing the Assurances

For each assurance, we'll focus on three things:

**Breaking It Down
(Key-Takeaways)**

- Identifying key takeaways

**Interpretation and
Implementation**

- Highlighting examples of grantee interpretations

**Bringing it
Back Home**

- Pinpointing questions grantees can use in program planning or evaluation

Assurance 4—Coordination of Services

Breaking It Down (Key-Takeaways)

Assurance 4: Coordination of Services

[Section 2605\(b\)\(4\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(4\)](#)

Grantees must coordinate their LIHEAP program with similar and related programs administered by the Federal Government and State, in particular:

- ✓ U.S. Dept. of Energy's Weatherization Assistance Program (WAP)
- ✓ Community Services Block Grant (CSBG) Program
- ✓ Supplemental Security Insurance (SSI) Program
- ✓ Social Services Block Grant (SSBG) Program
- ✓ Temporary Assistance for Needy Families (TANF) Program

Assurance 4—Coordination of Services

Interpretation and Implementation

- How are we ensuring that LIHEAP households know about services available from similar programs?
- How are we ensuring that other programs are aware of LIHEAP and can make referrals?
- How are we preventing duplication or overlap in services between agencies/programs?

Examples of LIHEAP coordination with other services:

- Meetings between administrators of various state or tribal low-income programs to discuss issues of mutual concern.
- Shared application process (or automated referral) between LIHEAP and WAP, as well as LIHEAP and other fuel assistance programs.
- Combined outreach efforts.
- Referrals of clients to other state or tribal low-income programs or from other programs to LIHEAP.
- Joint intake procedures alongside other low-income programs (TANF, SNAP, etc).
- Sharing records when not prohibited by law.

Assurance 4—Coordination of Services

Bringing it
Back Home

How will we interpret and implement Assurance 4?

Example Focus Areas, Questions

Shared Clients	<ul style="list-style-type: none">• Are we working with other programs (at the state and local level) to make it easier for our shared clients to access LIHEAP?• Are there hard-to-reach populations that other agencies work with regularly? Are we partnering to conduct outreach?
Avoiding Duplication	<ul style="list-style-type: none">• What steps are we taking to coordinate services among all LIHEAP providers to avoid duplication of effort and/or benefits?
Subgrantee Coordination	<ul style="list-style-type: none">• Do we expect our subgrantees to be fulfilling the LIHEAP requirement for coordination of services?• If so, are they aware of this expectation? How are we learning of their coordination efforts and/or outcomes?

Assurance 4—Coordination of Services

POLL QUESTION #5 (Assurance 4)

How do you assure that LIHEAP households are aware of similar or related low-income programs?

(Check all that apply)

- We administer and use one application for multiple low-income programs (including non-energy)
- We administer and use one application for multiple energy assistance programs
- LIHEAP applicants are automatically enrolled in or referred to programs in other departments
- Our local offices are required to provide referrals to other programs during intake
- We rely on local agencies to figure out how to coordinate services at the community level
- I'm not sure
- Other:

Assurance 4—Coordination of Services

QUESTIONS?

Assurance 5—Benefits

Breaking It Down (Key-Takeaways)

Assurance 5: Benefits

[Section 2605\(b\)\(5\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(5\)](#)

- Grantees will provide benefits in a timely manner.
- Grantees will assure that the highest level of assistance will be furnished to those households which have the lowest incomes and the highest energy costs or needs in relation to income, taking into account family size.
- Grantees may not determine benefits differently for households who are categorically eligible and households that are income eligible.
 - ✓ Categorical eligibility means that the household is eligible and that you can move to the benefit determination.

Assurance 5—Benefits

Interpretation and Implementation

How are we assuring that households are served in a timely manner?

- Many grantees track the application date, the date of intake, and the date a payment is sent to the vendor. This way, they can regularly check and follow-up on households that have sat in any particular “aging status” for too long.
- Some grantees set target timelines between each particular client or vendor transaction (e.g., maximum number of hours or days). These timelines can then be used to conduct desk reviews or monitor local offices, identify process challenges, and offer T/TA where needed.

How are we targeting higher benefits to those with higher energy burden (high energy costs/lowest income?)

- Most grantees use their benefit matrix to assure that higher benefits are targeted to households with high energy burdens.

Assurance 5—Benefits

Bringing it
Back Home

How will we interpret and implement Assurance 5?

Example Focus Areas, Questions

Timely Benefits	<ul style="list-style-type: none">• Do we have the tools in place to monitor the time it takes between a household submitting an application and approval of benefit? Between approval of benefit and payment to vendor?• Do we have clear expectations about how much time should (or shouldn't) elapse between each client/vendor transaction?
Benefit Determination	<ul style="list-style-type: none">• If all or part of our benefit matrix is based on income, how are we making sure that we using the same information/processes to determine benefits between categorically eligible households and income eligible households?
Targeting	<ul style="list-style-type: none">• Does our benefit matrix give higher benefits to those with lower incomes and higher energy costs? How do we know it is working?

Assurance 5—Benefits

POLL QUESTION #6 (Assurance 5)

How do you assure that LIHEAP applications are processed in a timely manner?

(Check all that apply)

- We require all applications to be processed within a certain timeframe
- We use our data system to track application date, approval date, payment date, etc.
- We monitor local agencies for the average amount of time between application and follow-up
- We rely on households to call and complain, and then follow-up on these reports
- I'm not sure
- Other:

Assurance 5—Benefits

QUESTIONS?

Assurance 6—Designation of Local Agencies

Breaking It Down (Key-Takeaways)

Assurance 6:

[Section 2605\(b\)\(6\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(6\)](#)

Grantees that wish to sub-contract the administration of LIHEAP to other organizations must give “special consideration” to those agencies who received Federal funds under any low-income energy assistance program or weatherization program in the past (*prior to the enactment of LIHEAP Act*).

- **Before giving “special consideration,” the grantee must determine that the agency involved meets program and fiscal requirements established by the State.**

Assurance 6—Designation of Local Agencies

Interpretation and Implementation

How do we define “special consideration?”

"Special consideration" is not defined in the law or the regulations. It is up to the grantee to decide how to interpret this phrase. Examples might include awarding priority or preference points, extending deadlines, or expediting portions of the subgrantee contracting and selection process for agencies noted in Assurance 6.

Bringing it Back Home

How will we interpret and implement Assurance 6?

Example Focus Areas, Questions

Contract Processes

- Does our current subgrantee contracting/selection process allow us to demonstrate that special consideration was given to agencies noted in Assurance 6?
- Does our current subgrantee contracting/selection process give too much “special consideration” to particular agencies? Too little?

Assurance 6—Designation of Local Agencies

POLL QUESTION #7 (Assurance 6)

If your state uses subgrantees, how do you give “special consideration” to those agencies outlined in Assurance 6?

(Check all that apply)

- We are mandated by state law to contract with specific agencies in our state for LIHEAP service delivery
- We use the same agencies we’ve always used to deliver our LIHEAP program
- The agencies outlined in Assurance 6 are given “first right of refusal” during our LIHEAP subgrantee selection process
- Our subgrantee contracting process is open to all, however we give preference (e.g., additional points) to those agencies/organizations referenced in Assurance 6
- I’m not sure
- We don’t use subgrantees
- Other:

Assurance 6—Designation of Local Agencies

QUESTIONS?

Assurance 7—Vendor Payments

Breaking It Down (Key-Takeaways)

Assurance 7: Vendor Payments

[Section 2605\(b\)\(7\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(7\)](#)

Grantees who choose to pay home energy suppliers directly must establish procedures to –

- Make sure the household knows how much assistance the vendor received as payment for the household's fuel (each household must receive Notice of Action)
- Make sure that the vendor reduces the household's bill by the amount of its LIHEAP benefit and does not overcharge the household.
- Make sure that the vendor does not treat LIHEAP households adversely or discriminate against LIHEAP households.

The grantee must also ensure that the option to provide vendor payments remains with the state (in consultation with local subgrantees)—and may be contingent on vendors providing special protections, pricing, or services for LIHEAP households.

Assurance 7—Vendor Payments

Interpretation and Implementation

How am I assuring that LIHEAP benefits are applied to the bill and that households are not treated adversely?

- Vendor agreements are the most common way to protect the client—assuring that the benefit is applied correctly and that the client is not treated adversely as a result of receiving LIHEAP. Additionally, agreements lay out how the vendor will refund monies to the appropriate agency.

How am I using vendor payments to leverage additional protections for clients?

- Some states have used vendor agreements to negotiate additional protections for clients. For example, in some states, when a utility accepts a LIHEAP benefit, they agree to maintain energy service to the household for a minimum time period (e.g., 30-60 days). In other cases, grantees have used vendor payments to leverage discounted fuel pricing for LIHEAP households.

Assurance 7—Vendor Payments

Bringing it
Back Home

How will we interpret and implement Assurance 7?

Example Focus Areas, Questions

Vendor Agreements	<ul style="list-style-type: none">• If I do not have a vendor agreement in place, how am I assuring the LIHEAP protections noted under this assurance?• Are there other LIHEAP grantees with whom I could partner to develop and/or negotiate vendor agreements?
Vendor Monitoring	<ul style="list-style-type: none">• How am I making sure that vendors are applying benefits correctly and not treating LIHEAP clients adversely?• Do households have a designated number or person to contact if their benefit is not applied correctly or in a timely manner? If they feel they are being treated adversely by the vendor?
Additional Protections	<ul style="list-style-type: none">• How could I utilize my vendor agreement to negotiate more protections or services for LIHEAP households (e.g., payment plans, discounted rates, arrearage reduction, waived deposit or late fees, waived reconnection fees)?

Assurance 7—Vendor Payments

POLL QUESTION #8 (Assurance 7)

How do your state assure that vendors are applying benefits correctly and not treating LIHEAP clients adversely?

(Check all that apply)

- We conduct vendor monitoring that includes comparing bills of LIHEAP and non-LIHEAP customers.
- We have a vendor monitoring process that includes verification/timing of LIHEAP benefit on customer bill
- We provide annual, updated LIHEAP training to our vendors
- We provide a one-time LIHEAP training to our new vendors
- We meet regularly with our vendors to identify potential issues with program delivery/design
- We rely on customer complaints to identify and follow-up on vendor concerns
- I'm not sure
- Other:

Assurance 7—Vendor Payments

QUESTIONS?

Assurance 8—Equitable Treatment

Breaking It Down (Key-Takeaways)

Assurance 8: Equitable Treatment

[Section 2605\(b\)\(8\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(8\)](#)

- Grantees may not limit eligibility to only those households who are “categorically eligible” for LIHEAP (as discussed in Assurance 2). Grantees must offer households the option of income eligibility as well.
- Owners and renters must be treated equitably. This includes:
 - ✓ Households that own or are buying their home
 - ✓ Households that rent their home and pay separately for energy costs
 - ✓ Households who rent their home and energy costs are included in the rent

Assurance 8—Equitable Treatment

Interpretation and Implementation

How do our policies and procedures differ between homeowners and renters?

- Most grantees treat homeowners and renters who are responsible for paying their own energy costs equally, using the same eligibility and benefit determination procedures.
- “Heat in rent” households have an energy burden that is realized in the form of higher rent payments. In the absence of an energy bill, grantees may use proxy (estimated) energy costs or a percentage of rent to determine a benefit amount.
- When heat is included in rent, grantees may pay the household directly or may pay the landlord. Many grantees may require a copy of the lease or a letter signed by the landlord. This may require the landlord to do one or more of the following:
 - Identify the main heating fuel type used in the home/unit
 - Estimate the portion of the rent payment used for energy costs
 - Guarantee that the LIHEAP benefit will be applied to the client’s energy costs
 - Guarantee that the LIHEAP household will not be evicted for a set period of time
 - Reduce the household’s next rent payment by the amount of the benefit

Assurance 8—Equitable Treatment

Bringing it
Back Home

How will we interpret and implement Assurance 8?

Example Focus Areas, Questions

Access	<ul style="list-style-type: none">• If we automatically enroll households into LIHEAP when they apply for or receive other social service benefits—how are we making sure that households not participating in these programs can just as easily apply?
Household Burden	<ul style="list-style-type: none">• Are we placing a disproportionately high level of burden on non-categorically eligible households or renters in order to apply for and receive services (asking them for unnecessary documentation that categorically eligible households or homeowners are not required to produce?)
Renter Policies, Procedures	<ul style="list-style-type: none">• Do we know what percentage of LIHEAP eligible households in our state, tribe, or territory are renters? Have we taken this into consideration when designing our eligibility and benefit determination policies for renters?
Household Protections	<ul style="list-style-type: none">• If we pay benefits to heat-in-rent households, how are we assuring protections for the household (e.g., landlord applies benefit to rent)?

Assurance 8—Equitable Treatment

POLL QUESTION #9 (Assurance 8)

How do LIHEAP benefits differ between renters and owners in your state? Note—this does not include subsidized housing applicants.

(Check all that apply)

- If the household pays their own utility bill, it doesn't matter whether they are a renter or owner. Their benefit amount is determined using the same benefit matrix
- If the household is a renter and pays their own utility bill, their benefit amount is reduced (for renter households, we use a unique benefit matrix or reduce benefits by a set amount or fraction)
- If a household pays a landlord for utilities, we require a letter from the landlord. However, their benefit amount is determined using the same benefit matrix as everyone else
- If a household pays a landlord for utilities, we require a letter from the landlord AND their benefit is reduced (we use a unique benefit matrix or reduce benefits by a set amount or fraction)
- If a household pays a landlord for utilities, we do not provide them with a LIHEAP benefit
- I'm not sure
- Other:

Assurance 8—Equitable Treatment

QUESTIONS?