Policy Manuals
Framework for Tribal LIHEAP Grantees

LIHEAP Training hosted by the Office of Community Services (OCS) in the Administration for Children and Families (ACF)

March 2, 2021

Welcome:
Vikki Pretlow (OCS)

Presenters:
Erin Steuer (NCAT)
Radley Davis (Redding Rancheria)
Josephine Rago-Adia (OCS)
Welcome

Purpose of This Session

- Review the purpose and function of a policy manual
- Determine content for inclusion
- Identify when to review and update policy manuals
- Learn from a grantee about putting these ideas into practice

Audience for This Session

- LIHEAP Tribal Grantees and program staff who are interested in obtaining information about the operation of their LIHEAP programs. This includes:
  - LIHEAP coordinators
  - LIHEAP office staff
  - LIHEAP/program monitors
Session Overview

Structure of The Session

• 50 minutes to review core elements of a Policy Manual
  • Includes discussion with panelist about putting these ideas in to practice

• 10 minutes for Q & A

Have a question?

• You are encouraged to ask questions as you have them by typing them into the chat box.

• Submitted questions will be reviewed and responded to at the end of the webinar or via an e-mail.
Zoom Chat Box

Chat on your Desktop
Meeting controls will be visible across the bottom of your screen. Chat box will open on the right side of the screen.

Chat on your Device
Meeting controls will be visible across the bottom of your screen. Chat box will open on the right side of the screen.
The Significance of a Policy Manual

THE LAW AND IT’S REQUIREMENTS
The Law and Assurances

- HHS has written regulations that interpret *parts* of the law; however, since LIHEAP is considered a “block grant,” most of the decisions about how the law should be interpreted are left up to the grantees.

- Grantees must agree to comply with the law and submit an annual plan describing how the assurances will be implemented.

- Each grantee has primary responsibility for interpreting the law and for making sure that the LIHEAP program is run consistently with the law.

- The law applies to all components that may be offered through the LIHEAP program and include: heating assistance, cooling assistance, crisis intervention assistance and weatherization.

Presenter(s): Erin Steuer
Policy Manuals

- Continuity of Operations
- Training resource for staff
- Program Integrity
- Reporting and Record Retention
Grantee Discussion

MR. RADLEY DAVIS
LIHEAP COORDINATOR
REDDING RANCHERIA, CALIFORNIA
Tribal Community Qualifications

- Discussions with LIHEAP Liaison (who is an Indian?)
- Clarification with Tribal Leadership (who is an Indian?)
- Creating the policy
Finance Department Collaboration

- Clarifying level of payment approvals for households
- Working together to improve the matrix used for payment assistance levels
- Improved understanding of LIHEAP and Tribal fiscal policies
What to include in a Policies and Procedures Manual

DETERMINING CONTENT AND DETAIL
Determining Content

- LIHEAP Statute
- Assurances
- Federal Regulations
- Tribal Rules
Core Sections to Include

- Introduction
- Definitions
- Types of Assistance
- Procedure
- Appeals
- Record Keeping
Detailed Sections

- Eligibility Determination and Criteria
  - Identify verification (i.e. how information is collected, stored, and verified)
  - Defining household members and verifying the household address
  - Defining included and excluded income and income deductions
  - Timeframe for income verification review
  - Categorical Eligibility

- Setting Payment Levels
  - How factors such as energy costs, income, and family size impact payment
  - Developing criteria and a benefit matrix

Presenter(s): Erin Steuer
Detailed Sections (cont.)

- **Crisis Policy**
  - Types of Crisis Programs your program offers
  - Set aside funds for energy crisis intervention programs
  - Time limits and client accessibility
  - How and when to apply for an exemption
  - Crisis definition
  - Crisis Benefits

- **Weatherization**
  - Funding allotted to weatherization
  - Program procedures and monitoring
  - When and how to request a waiver
Detailed Sections (cont.)

- Working with Vendors
  - Payments and refunds
  - Vendor Agreements

- Program Coordination
  - Who? When? etc.
  - Avoiding duplication (state resources and systems)
  - State/tribe agreements
  - Weatherization partnerships (with the state)
  - Working with other state and tribal programs
  - Coordinated application intake/referrals; one-entry point system
  - Working with other social service programs to get income verification

Presenter(s):
Erin Steuer
Outreach

- Community Input
- Tribal Government Input and Approval
Policy and Detail

- Types of Assistance
- Calculation of countable income
- Re-obligating unused funds
Review, Revise, and Update

WHEN AND WHY
Recommendations

- **Update and revise when:**
  - Program changes are implemented
  - During plan development
  - When there is an emergent need

- **Review:**
  - Before submitting model plan
  - During material updates and revisions
  - Every 6 months if possible; consider writing this in to your annual program calendar
  - During the close of a program as a reflective exercise; this can help drive changes

**Note:** Keep track of review dates and consider tracking revision dates on the document.
Grantee Discussion

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LIHEAP COORDINATOR
REDDING RANCHERIA, CALIFORNIA
Review and Revise

- When: when we review and how often
- Who: Collaboration, Tribal Council Input
Conclusion

- Consult LIHEAP Statute, the Assurances, related Federal Regulations, and Tribal Rules in deciding what to include in your manual.

- Review and determine which sections are important to include in your manual, and what level of detail is section should include.

- Review and update regularly.

- Use your policy manual in the development of your annual plan.

- Review your manual as a team at the end of each program year as an exercise in improving program operations.

- Communicate with your federal liaisons with questions related to policy or allowable activities, and reference available resources to help in the development.
  - You are not alone and do not need to develop one entirely from scratch.
Grantee Discussion

MR. RADLEY DAVIS
LIHEAP COORDINATOR
REDDING RANCHERIA, CALIFORNIA
Resources Used

- Tribal Liaison
- LIHEAP Clearinghouse
Questions and Answers
Resources

- **LIHEAP Statute and Regulations**
  - A complete listing of LIHEAP statute and regulations

- **LIHEAP Policy and Guidance**
  - Includes Action Transmittals, Information Memoranda, and Dear Colleague Letters

- **LIHEAP Grantee Resource Guide**
  - LIHEAP Clearinghouse Resource outlining the law and statute, program components, and program administration.
  - [https://liheapch.acf.hhs.gov/Tribes/manual.htm](https://liheapch.acf.hhs.gov/Tribes/manual.htm)
Resources

- **LIHEAP Grantee Peer Exchange Network**
  - LIHEAP Clearinghouse resource that provides grantees the opportunity to share program information in an informal setting.
  - [https://liheapch.acf.hhs.gov/content/grantees](https://liheapch.acf.hhs.gov/content/grantees)

- **LIHEAP Clearinghouse: Tribal Plan, Manuals and Delegation Letters**
  - Includes tribal annual plans, policy manuals, and delegation letters
  - [https://liheapch.acf.hhs.gov/Tribes/trplans.htm](https://liheapch.acf.hhs.gov/Tribes/trplans.htm)

- **LIHEAP Virtual Library**
  - Allows grantees to locate resources based on their unique needs.
  - [https://liheappm.acf.hhs.gov/assessment/#nbb](https://liheappm.acf.hhs.gov/assessment/#nbb)
Contact Us

If we are not able to respond to your question during the webinar, we will follow-up via e-mail. If you have additional questions, please e-mail:

• Erin Steuer, LIHEAP Clearinghouse, erins@ncat.org

• Radley Davis, Redding Rancheria LIHEAP Coordinator, Radley.davis@redding-Rancheria-nsn.gov

• Office of Community Services, Division of Energy Assistance, Federal Staff Contact List

• LIHEAP Grantee Contact List, Tribal Grantee Contact List State and Territory Grantees