

# Policy Manuals Framework for Tribal LIHEAP Grantees

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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

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## 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 in to 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

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## 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

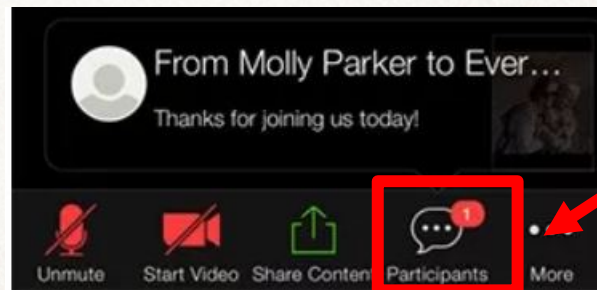
## Chat on your Desktop

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

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THE LAW AND IT'S REQUIREMENTS



# The Law and Assurances

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- 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.



# Policy Manuals

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



# Grantee Discussion

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MR. RADLEY DAVIS  
LIHEAP COORDINATOR  
REDDING RANCHERIA, CALIFORNIA





# Tribal Community Qualifications

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



# Finance Department Collaboration

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- 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

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DETERMINING CONTENT AND DETAIL



# Determining Content

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- LIHEAP Statute
- Assurances
- Federal Regulations
- Tribal Rules



# Core Sections to Include

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



# Detailed Sections

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## ■ 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



# Detailed Sections (cont.)

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## ■ 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.)

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- **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





# Grantee Discussion

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LIHEAP COORDINATOR  
REDDING RANCHERIA, CALIFORNIA



# Outreach

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- Community Input
- Tribal Government Input and Approval



# Policy and Detail

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- Types of Assistance
- Calculation of countable income
- Re-obligating unused funds



# Review, Revise, and Update

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WHEN AND WHY



# Recommendations

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- **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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REDDING RANCHERIA, CALIFORNIA



# Review and Revise

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



# Conclusion

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- 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

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# Resources Used

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- Tribal Liaison
- LIHEAP Clearinghouse



# Questions and Answers

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# Resources

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- **LIHEAP Statute and Regulations**

- A complete listing of LIHEAP statute and regulations
- <https://www.acf.hhs.gov/ocs/law-regulation/liheap-statute-and-regulations>

- **LIHEAP Policy and Guidance**

- Includes Action Transmittals, Information Memoranda, and Dear Colleague Letters
- <https://www.acf.hhs.gov/ocs/policy-guidance/liheap-policy-and-guidance>

- **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>



# Resources

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## ▪ 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>

## ▪ 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>

## ▪ LIHEAP Virtual Library

- Allows grantees to locate resources based on their unique needs.
- <https://liheappm.acf.hhs.gov/assessment/#nbb>



# Contact Us

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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:

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- Office of Community Services, Division of Energy Assistance,  
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- LIHEAP Grantee Contact List,  
[Tribal Grantee Contact List](#)  
[State and Territory Grantees](#)

