

# LIHEAP Model Plan Reference Guide



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**



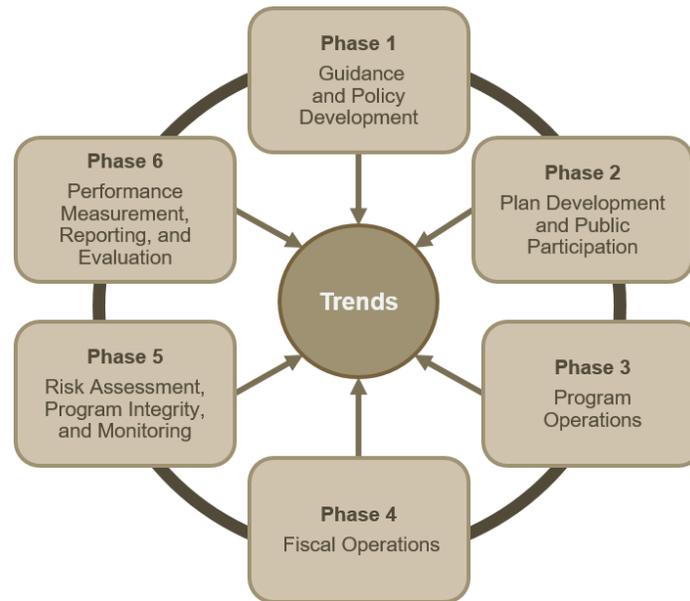
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## Introduction to the LIHEAP Model Plan

Your annual Model Plan addresses each part of the Low Income Home Energy Assistance Program (LIHEAP) Lifecycle (see Figure 1). For more information on the LIHEAP Lifecycle, see the Appendix in this reference guide.

**Figure 1: LIHEAP Lifecycle**



Grantees use their Model Plans to:

- Submit the funding application required under Sections 2605(a)(1) and (c)(1) of the LIHEAP statute.
- Provide assurances to Department of Health and Human Services (HHS) that they will administer the LIHEAP grant in accordance with federal LIHEAP statutes, rules, and regulations.
- Outline the LIHEAP components for consistent, accurate, and timely provision to household applicants.
- Set clear guidelines to which recipients and LIHEAP staff can be held accountable.
- Ensure that recipients are being treated fairly.
- Train new staff easily and efficiently.
- Assist during staff and management transitions.
- Comply with HHS Program Integrity and other fiscal requirements.

### IMPORTANT:

- **Unless a different due date is announced by the Office of Community Services (OCS), in order to receive LIHEAP funds for the federal fiscal year (FFY), your Model Plan must be submitted in the Online Data Collection (OLDC) by September 1.**
- **If you are unfamiliar with the OLDC, see the “Using the Online Data Collection (OLDC)” section in this reference guide for more information.**

Your Model Plan may have up to 20 sections. These sections address the various components of your LIHEAP Model Plan, aspects of program administration required by the LIHEAP statute, monitoring, training, and other activities.

Keep the following points in mind when developing your Model Plan:

- Only include sections that are applicable to your Model Plan.
- Some sections are only required for State grantees. These sections are clearly marked in the section’s title.
- Within each section, there are several questions that should be answered. Most questions are required. Those questions that are not required are clearly marked as optional.

**IMPORTANT:**

- Your Model Plan must be an up-to-date reflection of how your LIHEAP program actually operates.
- Your Model Plan must be consistent with your policy manual.
- You should not include facets of the program that you do not plan to administer.
- If you need to modify your Model Plan at any point in the FFY, you can revise it in the OLDC.

This reference guide highlights some of the most relevant questions to address within each of these sections, as well as additional items to think about when creating your Model Plan.

**IMPORTANT:**

- Within each section of the OLDC, be aware of statutes that apply (if any) to each item in the section (e.g., Section 1 Program Components, 2605(a), 2605(b)(1) – Assurance 1, 2605 (c)(1)(C), etc.).
- Statutes are listed above applicable items in each section.

Section 1 Program Components		
Program Components <b>2605(a), 2605(b)(1) - Assurance 1, 2605(c)(1)(C)</b>		
1.1 Check which components you will operate under the LIHEAP program. (Note: You must provide information for each component designated here as requested elsewhere in this plan.)		Dates of Operation
		Start Date      End Date
<input type="checkbox"/> Heating assistance		
Estimated Funding Allocation <b>2604(C), 2605(k)(1), 2605(b)(9), 2605(b)(16) - Assurances 9 and 16</b>		
1.2 Estimate what amount of available LIHEAP funds will be used for each component that you will operate: The total of all percentages must add up to 100%.		Percentage ( % )

## General Information

This part is required to be included for all Model Plans.

The first part of your Model Plan outlines basic information about you (the grantee) and your Model Plan.

Pay close attention to the information you provide in the following parts.

→ **7f Name and contact information of person to be contacted on matters involving this application**

The information in this part should match your grantee contact information posted on the OCS Web site (see Figure 2). If it does not, contact OCS to ensure corrections are made to the Web site.

**Figure 2: 7f Name and contact information of person to be contacted on matters involving this application**

7. APPLICANT INFORMATION			
* a. Legal Name: <input type="text"/>			
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text"/>		* c. Organizational DUNS: <input type="text"/>	
* d. Address:			
* Street 1: <input type="text"/>	Street 2: <input type="text"/>		
* City: <input type="text"/>	County: <input type="text"/>		
* State: <input type="text"/>	Province: <input type="text"/>		
* Country: <input type="text" value="Select"/>	* Zip / Postal Code: <input type="text"/>		
e. Organizational Unit:			
Department Name: <input type="text"/>		Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix: <input type="text"/>	* First Name: <input type="text"/>	Middle Name: <input type="text"/>	* Last Name: <input type="text"/>
Suffix: <input type="text"/>	Title: <input type="text"/>	Organizational Affiliation: <input type="text"/>	
* Telephone Number: <input type="text"/>	Fax Number: <input type="text"/>	* Email: <input type="text"/>	

→ **13a Applicant**

Your congressional district is the area in which your main office is located. The applicant listed should be the name of your congressional district (see Figure 3). Be sure to cross-check this location with the address listed in part 7d Address.

The Congressional District Locator by ZIP Code can be found at: <http://congressional-district.insidegov.com/>.

**Figure 3: 13a Applicant**

13. CONGRESSIONAL DISTRICTS OF:	
* a. Applicant <input type="text"/>	b. Program/Project: <input type="text"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	

→ **13b Program/Project**

For States, type "statewide" in this field (see Figure 4).

For Tribes, the response should cover the Tribe's service area. More than likely, it will be the same as the response to part 7a Legal Name.

**Figure 4: 13b Program/Project**

<b>13. CONGRESSIONAL DISTRICTS OF:</b>	
* a. Applicant	b. Program/Project:
<input type="text"/>	<input type="text"/>
Attach an additional list of Program/Project Congressional Districts if needed.	
<input type="text"/>	

→ **18a Typed or Printed Name and Title of Authorized Certifying Official**

The name and/or title of the authorized certifying official should match the information provided in the Delegation Letter (see Figure 5). Otherwise, it should be the name of your grantee's Governor or Tribal Chairperson.

If the Delegation Letter is from a prior year, cross-check the name you provide with name of current Governor or Tribal Chairperson in the appropriate directory:

- U.S. Governors Directory: <http://www.nga.org/cms/governors/bios>
- Tribal Chairperson Directory: <http://www.ncai.org/tribal-directory>

**Figure 5: 18a Typed or Printed Name and Title of Authorized Certifying Official**

<p>18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)</p> <p>**I Agree <input type="checkbox"/></p> <p>** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.</p>	
18a. Typed or Printed Name and Title of Authorized Certifying Official	18c. Telephone (area code, number and extension)
18b. Signature of Authorized Certifying Official	18d. Email Address
	18e. Date Report Submitted (Month, Day, Year)
Attach supporting documents as specified in agency instructions. 📎	

See the References section of this reference guide for a hyperlink to sample Delegation Letters.

## Section 1: Program Components

This section is required to be included for all Model Plans.

### Types of Assistance

First, you need to identify the types of assistance that will be covered under your LIHEAP Model Plan:

- Heating
- Cooling
- Crisis
- Weatherization
- Assurance 16

You are required to include either a heating or cooling program. You may choose to include both programs. You are also required to include a crisis program. The weatherization program and Assurance 16 are always optional. Even if you do not initially include a type of assistance, you can revise your Model Plan in the OLDC after it is approved.

Pay close attention to the information you provide in the following parts.

→ **1.1 Check which components you will operate under the LIHEAP program.**

The start date of operation for each component should span no more than 12 months (typically between October 1 and September 30) of the FFY of your Model Plan. If you intend to issue benefits for winter crisis only, the dates of operation should not extend into the summer months. A year-round crisis program should show dates of operation that span an entire year. If you are using a different budget period, add an explanation in this section (see IMPORTANT:

- The end date for the crisis component cannot be before March 16. The LIHEAP statute requires that crisis funds be made available at least through March 15.

Figure 6).

Grantees may choose different start and end dates for their programs within the FFY covered by the LIHEAP Model Plan.

#### IMPORTANT:

- The end date for the crisis component cannot be before March 16. The LIHEAP statute requires that crisis funds be made available at least through March 15.

Figure 6: 1.1 Check which components you will operate under the LIHEAP program.

1.1 Check which components you will operate under the LIHEAP program. (Note: You must provide information for each component designated here as requested elsewhere in this plan.)		Dates of Operation	
		Start Date	End Date
<input type="checkbox"/>	Heating assistance	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	Cooling assistance	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	Crisis assistance	<input type="text"/>	<input type="text"/>
<input type="checkbox"/>	Weatherization assistance	<input type="text"/>	<input type="text"/>

## Funding Allocation

After you identify the types of assistance you will provide, you will need to estimate the percentage of funds used for each area of operation. When you add all of the percentages, it should always equal 100 (see Table 1).

**Table 1: Funding Allocation Example**

Percentage	Area of Operation	Maximum Allocations
50%	Heating	N/A
20%	Cooling	N/A
10%	Crisis	N/A
0%	Weatherization	The maximum allocation for Weatherization is 15% of the total allocation. After April 1, grantees may request a Weatherization Waiver for up to 25%. If you receive a Weatherization Waiver from OCS to go over 15%, revise this information in your Model Plan in the OLDC to account for the added percentage in Weatherization, as well as the reduction from the area you plan to take those funds.
5%	Carryover to the Following FFY	The maximum allocation is up to 10% from the current year.
10%	Administrative and Planning Costs	The maximum allocation is up to 10% of the total allocation.
5%	Services to Reduce Home Energy Needs (Assurance 16)	The maximum allocation is up to 5% of the total allocation.
0%	Development and Implementation of Leveraging Activities	<b>State Grantees:</b> The maximum allocation is the greater of 0.08% or \$35,000. <b>Tribal Grantees:</b> The maximum allocation is the greater of 2% or \$100.

These percentages are only estimates. The OCS does not hold you to the percentages in your Model Plan. However, if your budgeted allocations begin to vary from your Model Plan, submit a revision to your plan in the OLDC by September 30. OCS encourages you to revise your Model Plan as often as needed and as early as possible.

### IMPORTANT:

- Percentage caps are NOT programmed into the OLDC’s validation checks for Development and Implementation of Leveraging Activities. Please be aware of the maximum allocations allowed.
- All other statutory percentage caps are programmed into the OLDC’s validation checks.

## Categorical Eligibility

Categorical eligibility is used to automatically qualify households for LIHEAP if at least one of member currently receives assistance from another program.

This part of Section 1 is not required to be completed if you do not practice categorical eligibility.

If you intend to adopt categorical eligibility, this part of Section 1 asks you to identify when households and/or individuals are considered to be categorically eligible for your plan based on other programs in which they participate.

Other programs include the following:

- Temporary Assistance for Needy Families (TANF)
- Supplemental Security Income (SSI)
- Supplemental Nutrition Assistance Program (SNAP)
- Certain Means-tested Veterans Programs

The LIHEAP statute identifies TANF, SSI, SNAP, and certain means-tested veterans programs for categorical eligibility. When you select “Other” as one of your options, this may prompt a conversation with the OCS to learn more about the other program(s) you plan to use for categorical eligibility.

**IMPORTANT:**

- You cannot identify a non-federal or federal program that is not listed in the LIHEAP statute.
- Certain tribal food assistance initiatives authorized under SNAP can be identified as an eligible program.

Pay close attention to the information you provide in the following parts.

➔ **1.5 Do you automatically enroll households without a direct annual application?**

If you do not require a direct annual application from each client, be sure to provide responses in the explanation field for the following questions (see Figure 7):

- How are clients informed of their fair hearing rights?
- How is income eligibility established?
- If eligibility is established through categorical eligibility, how is their level of income determined in order to make a benefit determination?
- How is each client’s utility information identified?

**Figure 7: 1.5 Do you automatically enroll households without a direct annual application?**

1.5 Do you automatically enroll households without a direct annual application?  Yes  No

If Yes, explain:

➔ 1.7d How do you confirm that the household receiving a nominal payment has an energy cost or need?

There is a provision in the Farm Bill that allows a SNAP recipient to receive a higher level of benefit if the recipient also received LIHEAP. Some states decide to provide a nominal LIHEAP benefit of greater than \$20, the minimum threshold established in the Farm Bill. This question is asking you to justify the nominal benefit amount, apart from the fact that it would result in greater SNAP benefits (see Figure 8). Keep in mind that LIHEAP funds must support home energy costs or needs.

**Figure 8: 1.7d How do you confirm that the household receiving a nominal payment has an energy cost or need?**

1.7a Do you allocate LIHEAP funds toward a nominal payment for SNAP households? <input type="radio"/> Yes <input type="radio"/> No	
If you answered "Yes" to question 1.7a, you must provide a response to questions 1.7b, 1.7c, and 1.7d.	
1.7b Amount of Nominal Assistance:	<input type="text" value="\$0.00"/>
1.7c Frequency of Assistance	
<input type="checkbox"/>	Once Per Year
<input type="checkbox"/>	Once every five years
<input type="checkbox"/>	Other - Describe: <input type="text"/>
1.7d How do you confirm that the household receiving a nominal payment has an energy cost or need?	
<div style="border: 1px solid #ccc; height: 100px;"></div>	
<div style="border: 1px solid #ccc; padding: 2px;"> <span>B</span> <span>I</span> <span>U</span> <span>☰</span> <span>☰</span> <span>↶</span> <span>↷</span> <span>🔍</span> <span>🗨️</span> </div>	

## Define Countable Income

Next, you need to define which income threshold you will be using when determining LIHEAP eligibility:

- 150% Federal Poverty Guidelines (FPG)
- 60% State Median Income (SMI)

**IMPORTANT:**

- You must cap income-eligibility for LIHEAP’s fuel assistance and crisis benefits at (1) no more than the greatest of 150% of the FPG or 60% of the SMI and (2) no less than 110% of FPG.

You have the discretion to choose either gross pay or net pay as the basis for determining income eligibility.

State grantees that select net pay for their Model Plans should report on each client’s income level based on gross pay in the Household Report Long Form. **State must record the household's gross pay, even if that amount is not used for income eligibility purposes.**

This stipulation does not apply to Tribal grantees who report on the short form.

Then, you need to identify what you will consider as countable income for the household when determining LIHEAP eligibility. This part of the section provides a long list of options that you may want to take into consideration.

Some of the most commonly considered types of income include the following:

- Social Security Administration (SSA) benefits (including/excluding Medicare deduction)
- Loans that need to be repaid
- Cash gifts
- Savings account balance
- One-time lump-sum payments, such as rebates/credits, winnings from lotteries, refund deposits, etc.
- Earned income of a child under the age of 18 (student/not a student)
- Funds received by household for the care of a foster child
- Income tax refunds
- Child support
- Other

If you select “Other” as a type of income, please provide an explanation (such as a royalty or mineral income).

**IMPORTANT:**

- **The Federal Government does not set a standard for what shall be included as countable income for LIHEAP eligibility determinations.**
- **Therefore, in your Model Plan, please be specific as to what types of income you will count.**

Be aware that there are very specific sources of income that CANNOT be counted when determining LIHEAP eligibility due to restrictions set into Federal law:

- Supplemental Nutrition Assistance Program (SNAP) benefits
- Special Supplemental Nutrition Program for Women, Infants, and Children (WIC) benefits
- Free or discounted lunches from the National School Lunch Program
- Non-gambling related tribal per capita payments (up to \$2,000 per person per year)
- Federal student aid for education (e.g., grants and loans to undergraduates)

You will see some of these non-countable incomes listed in this part of Section 1. These income sources have been included as a way to ensure that you are only counting allowable income in case you are not aware of the restrictions. If you wish to include one of these non-countable incomes, seek clarification from a liaison prior to submitting your Model Plan to ensure that your Model Plan will not be rejected.

## Section 2: Heating Assistance

This section is required to be included for your Model Plan if you included this type of assistance in Section 1.

In this section, you will be asked to consider the following questions and provide answers:

- Do you require an Assets test?
- Do you have additional or differing eligibility policies for renters than home owners?
- Do you give priority to elderly, disabled, young children, or households with high energy burdens?
- What variables will you use to determine benefit levels?
- What are the minimum and maximum benefits, and does this include in-kind benefits (e.g., blankets, space heaters, fans, etc.)?

Pay close attention to the information you provide in the following parts.

→ **2.3 Check the appropriate boxes below and describe the policies for each.**

These questions ask you to indicate various additional eligibility requirements for heating assistance (see Figure 9). For each requirement, be sure to include a corresponding explanation.

**Figure 9: 2.3 Check the appropriate boxes below and describe the policies for each.**

<b>2.3 Check the appropriate boxes below and describe the policies for each.</b>	
<a href="#">Do you require an Assets test ?</a>	<input type="radio"/> Yes <input type="radio"/> No
<b>Do you have additional/differing eligibility policies for:</b>	
Renters?	<input type="radio"/> Yes <input type="radio"/> No
Renters Living in subsidized housing ?	<input type="radio"/> Yes <input type="radio"/> No
Renters with utilities included in the rent ?	<input type="radio"/> Yes <input type="radio"/> No
<b>Do you give priority in eligibility to:</b>	
<a href="#">Elderly?</a>	<input type="radio"/> Yes <input type="radio"/> No
Disabled?	<input type="radio"/> Yes <input type="radio"/> No
<a href="#">Young children?</a>	<input type="radio"/> Yes <input type="radio"/> No
Households with high energy burdens ?	<input type="radio"/> Yes <input type="radio"/> No
Other? <input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
<b>Explanations of policies for each "yes" checked above:</b>	
<div style="border: 1px solid #ccc; padding: 5px;"> <p><b>B</b> <i>I</i> <u>U</u>                     </p> </div>	

→ **2.4 Describe how you prioritize the provision of heating assistance to vulnerable populations, e.g., benefit amounts, early application periods, etc.**

Vulnerable populations include elderly (60 years of age and older), disabled (grantee-defined), and children (under 6 years of age) (see Figure 10).

Examples of prioritization include the following:

- Early application periods
- Higher level of benefits
- Targeting in outreach activities

You can prioritize the issuance of benefits to households with vulnerable populations. While prioritization is not a requirement, it may help you manage the program better and target benefits to households with highest needs.

**Figure 10: 2.4 Describe how you prioritize the provision of heating assistance to vulnerable populations, e.g., benefit amounts, early application periods, etc.**



→ **2.5 Check the variables you use to determine your benefit levels.**

Review the heating components of the benefits matrix (see Figure 11):

- Ensure that the structure lines up with your responses in your Model Plan.
- Ensure that three variables are used on the benefit matrix: income, household size, and energy cost/need.
- Verify that all factors selected in your Model Plan are reflected in the matrix that you will attach.
- Ensure that you use the most recent FPG issued by HHS: <https://www.acf.hhs.gov/ocs/resource/liheap-im-2017-02-fy-2017-hhs-federal-poverty-guidelines>.

The poverty level can account for both income and household size.

**Figure 11: 2.5 Check the variables you use to determine your benefit levels.**

2.5 Check the variables you use to determine your benefit levels. (Check all that apply):	
<input type="checkbox"/>	Income
<input type="checkbox"/>	Family (household) size
<input type="checkbox"/>	Home energy cost or need:
<input type="checkbox"/>	Fuel type
<input type="checkbox"/>	Climate/region
<input type="checkbox"/>	Individual bill
<input type="checkbox"/>	Dwelling type
<input type="checkbox"/>	Energy burden (% of income spent on home energy)
<input type="checkbox"/>	Energy need
<input type="checkbox"/>	Other - Describe:

→ **2.6 Describe estimated benefit levels for FY 2018**

Make sure the minimum and maximum benefit levels line up with what is shown in the benefits matrix for heating assistance.

**Figure 12: 2.6 Describe estimated benefit levels for FY 2018**

2.6 Describe estimated benefit levels for FY 2018:			
Minimum Benefit	<input style="width: 90%;" type="text"/> \$0	Maximum Benefit	<input style="width: 90%;" type="text"/> \$0

## Section 3: Cooling Assistance

This section is required to be included for your Model Plan if you included this type of assistance in Section 1.

In this section, you will be asked to consider the following questions and provide answers.

- Do you require an Assets test?
- Do you have additional or differing eligibility policies for renters than home owners?
- Do you give priority to elderly, disabled, young children, or households with high energy burdens?
- What variables will you use to determine benefit levels?
- What are the minimum and maximum benefits, and does this include in-kind benefits (e.g., blankets, space heaters, fans, etc.)?

Pay close attention to the information you provide in the following parts.

→ **3.3 Check the appropriate boxes below and describe the policies for each.**

These questions ask you to indicate various additional eligibility requirements for cooling assistance (see Figure 13). For each requirement, be sure to include a corresponding explanation.

**Figure 13: 3.3 Check the appropriate boxes below and describe the policies for each.**

3.3 Check the appropriate boxes below and describe the policies for each.	
<a href="#">Do you require an Assets test ?</a>	<input type="radio"/> Yes <input type="radio"/> No
Do you have additional/differing eligibility policies for:	
Renters?	<input type="radio"/> Yes <input type="radio"/> No
Renters Living in subsidized housing ?	<input type="radio"/> Yes <input type="radio"/> No
Renters with utilities included in the rent ?	<input type="radio"/> Yes <input type="radio"/> No
Do you give priority in eligibility to:	
<a href="#">Elderly?</a>	<input type="radio"/> Yes <input type="radio"/> No
Disabled?	<input type="radio"/> Yes <input type="radio"/> No
<a href="#">Young children?</a>	<input type="radio"/> Yes <input type="radio"/> No
Households with high energy burdens ?	<input type="radio"/> Yes <input type="radio"/> No
Other? <input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
Explanations of policies for each "yes" checked above:	
<div style="border: 1px solid #ccc; padding: 5px;"> <p style="text-align: center;"> <span>B</span> <span>I</span> <span>U</span> <span>☰</span> <span>☰</span> <span>↶</span> <span>↷</span> <span>🔗</span> <span>📄</span> <span>🔒</span> </p> </div>	

→ **3.4 Describe how you prioritize the provision of cooling assistance to vulnerable populations, e.g., benefit amounts, early application periods, etc.**

Vulnerable populations include elderly (60 years of age and older), disabled (grantee-defined), and children (under 6 years of age) (see Figure 14).

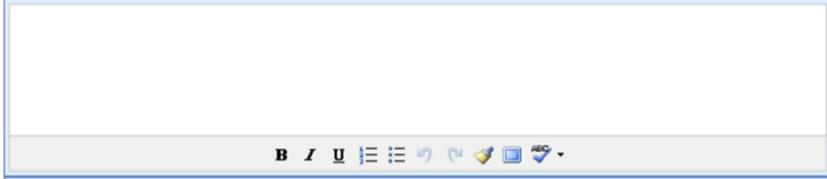
Examples of prioritization include:

- Early application periods
- Higher level of benefits
- Targeting in outreach activities

You can prioritize the issuance of benefits to households with vulnerable populations. While prioritization is not a requirement, it may help you manage the program better and target benefits to households with highest needs.

**Figure 14: 3.4 Describe how you prioritize the provision of cooling assistance to vulnerable populations, e.g., benefit amounts, early application periods, etc.**

3.4 Describe how you prioritize the provision of cooling assistance to vulnerable populations, e.g., benefit amounts, early application periods, etc.



→ **3.5 Check the variables you use to determine your benefit levels.**

Review the cooling components of the benefits matrix (see Figure 15).

- Ensure that the structure lines up with your responses in your Model Plan.
- Ensure that three variables are used on the benefit matrix: income, household size, and energy cost/need.
- Verify that all factors selected in your Model Plan are reflected in the matrix that you will attach.
- Ensure that you use the most recent FPG issued by HHS: <https://www.acf.hhs.gov/ocs/resource/liheap-im-2017-02-fy-2017-hhs-federal-poverty-guidelines>.

The poverty level can account for both income and household size.

**Figure 15: 3.5 Check the variables you use to determine your benefit levels.**

3.5 Check the variables you use to determine your benefit levels. (Check all that apply):

<input type="checkbox"/> Income
<input type="checkbox"/> Family (household) size
<input type="checkbox"/> Home energy cost or need:
<input type="checkbox"/> Fuel type
<input type="checkbox"/> Climate/region
<input type="checkbox"/> Individual bill
<input type="checkbox"/> Dwelling type
<input type="checkbox"/> Energy burden (% of income spent on home energy)
<input type="checkbox"/> Energy need
<input type="checkbox"/> Other - Describe:

B I U [List Icon] [List Icon] [Undo Icon] [Redo Icon] [Link Icon] [Help Icon] [ABC Icon]

→ **3.6 Describe estimated benefit levels for FY 2018**

Make sure the minimum and maximum benefit levels line up with what is shown in the benefits matrix for cooling assistance (see Figure 16).

**Figure 16: 3.6 Describe estimated benefit levels for FY 2018**

3.6 Describe estimated benefit levels for FY 2018:

<b>Minimum Benefit</b>	<input type="text" value="\$0"/>	<b>Maximum Benefit</b>	<input type="text" value="\$0"/>
------------------------	----------------------------------	------------------------	----------------------------------

## Section 4: Crisis Assistance

This section is required to be included for all Model Plans.

In this section, you will be asked to consider the following questions and provide answers:

- Do you require an Assets test?
- Do you have additional or differing eligibility policies for renters than home owners?
- Do you give priority to elderly, disabled, young children, or households with high energy burdens?
- What variables will you use to determine benefit levels?
- What are the minimum and maximum benefits, and does this include in-kind benefits (e.g., blankets, space heaters, fans, etc.)?
- How is “crisis” defined?
- What is considered a “life-threatening crisis”?
- Is crisis assistance seasonal (winter/summer) or year-round?
- Will you be providing heating and/or cooling equipment repair and replacement services under crisis?
- Are there additional eligibility requirements for crisis assistance?

### IMPORTANT:

- **Keep in mind that “crisis” and “life-threatening crisis” must be defined separately because they have different response times: 48 hours for a crisis and 18 hours for a life-threatening crisis.**
- **These definitions need to be different enough so that an intake worker is easily able to determine how to apply the crisis definition and how to apply the life-threatening crisis definition.**
- **These definitions need to be objective enough so that they can be fairly applied throughout the entire grantee service area, regardless of who the intake worker is.**
- **These definitions should be specific enough so that the conditions and intervention timeframes for each crisis type can be documented in a client file.**

Pay close attention to the information you provide in the following parts.

→ **4.7 Check the appropriate boxes below and describe the policies for each**

All of the items you select as eligibility requirements for the crisis component should be a part of the definitions described in 4.2 and 4.3 (see Figure 17).

Figure 17: 4.7 Check the appropriate boxes below and describe the policies for each

4.7 Check the appropriate boxes below and describe the policies for each	
<u>Do you require an Assets test ?</u>	<input type="radio"/> Yes <input type="radio"/> No
Do you give priority in eligibility to :	
<u>Elderly?</u>	<input type="radio"/> Yes <input type="radio"/> No
Disabled?	<input type="radio"/> Yes <input type="radio"/> No
<u>Young Children?</u>	<input type="radio"/> Yes <input type="radio"/> No
Households with high energy burdens?	<input type="radio"/> Yes <input type="radio"/> No
Other? <input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
In Order to receive crisis assistance:	
Must the household have received a shut-off notice or have a near empty tank?	<input type="radio"/> Yes <input type="radio"/> No
Must the household have been shut off or have an empty tank?	<input type="radio"/> Yes <input type="radio"/> No
Must the household have exhausted their regular heating benefit?	<input type="radio"/> Yes <input type="radio"/> No
Must renters with heating costs included in their rent have received an eviction notice ?	<input type="radio"/> Yes <input type="radio"/> No
Must heating/cooling be medically necessary?	<input type="radio"/> Yes <input type="radio"/> No
Must the household have non-working heating or cooling equipment?	<input type="radio"/> Yes <input type="radio"/> No
Other? <input type="text"/>	<input type="radio"/> Yes <input type="radio"/> No
Do you have additional / differing eligibility policies for:	
Renters?	<input type="radio"/> Yes <input type="radio"/> No
Renters living in subsidized housing?	<input type="radio"/> Yes <input type="radio"/> No
Renters with utilities included in the rent?	<input type="radio"/> Yes <input type="radio"/> No
Explanations of policies for each "yes" checked above:	
<div style="border: 1px solid #ccc; padding: 5px;"> <p><b>B</b> <i>I</i> <u>U</u>                     </p> </div>	



→ **4.10 Do you accept applications for energy crisis assistance at sites that are geographically accessible to all households in the area to be served?**

A “No” response to this question requires an explanation, which will be carefully analyzed (see Figure 20).

Grantees are required to provide alternative intake processes of homebound/disabled individuals, as well as ensure that services are geographically accessible.

**Figure 20: 4.10 Do you accept applications for energy crisis assistance at sites that are geographically accessible to all households in the area to be served?**

4.10 Do you accept applications for energy crisis assistance at sites that are geographically accessible to all households in the area to be served?	
<input type="radio"/> Yes <input type="radio"/> No Explain.	
<div style="border: 1px solid #ccc; height: 60px; width: 100%;"></div>	
<div style="border: 1px solid #ccc; padding: 2px;"> <span>B</span> <span>I</span> <span>U</span> <span>☰</span> <span>☰</span> <span>↶</span> <span>↷</span> <span>↺</span> <span>↻</span> <span>ABC</span> </div>	

→ **4.11 Do you provide individuals who are physically disabled the means to**

A “No” response to any of these questions requires an explanation, which will be carefully analyzed (see Figure 21).

Grantees are required to provide alternative intake processes of homebound/disabled individuals.

**Figure 21: 4.11 Do you provide individuals who are physically disabled the means to**

4.11 Do you provide individuals who are physically disabled the means to:	
Submit applications for crisis benefits without leaving their homes?	
<input type="radio"/> Yes <input type="radio"/> No If No, explain.	
Travel to the sites at which applications for crisis assistance are accepted?	
<input type="radio"/> Yes <input type="radio"/> No If No, explain.	
If you answered "No" to both options in question 4.11, please explain alternative means of intake to those who are homebound or physically disabled?	
<div style="border: 1px solid #ccc; height: 60px; width: 100%;"></div>	
<div style="border: 1px solid #ccc; padding: 2px;"> <span>B</span> <span>I</span> <span>U</span> <span>☰</span> <span>☰</span> <span>↶</span> <span>↷</span> <span>↺</span> <span>↻</span> <span>ABC</span> </div>	

→ **4.12 Indicate the maximum benefit for each type of crisis assistance offered.**

Verify that your responses here align with the dates of operation for the crisis component in Section 1.1 (see Figure 22):

- If you issue benefits for only winter crisis, the dates of operation should not extend into the summer months.
- If you issue benefits for summer crisis, the dates of operation should include the summer months.
- A year-round program should show dates of operation that span an entire year. You do not need to separate crisis benefits for winter and summer.

**Figure 22: 4.12 Indicate the maximum benefit for each type of crisis assistance offered.**

4.12 Indicate the maximum benefit for each type of crisis assistance offered.		
Winter Crisis	<input type="text" value="\$0.00"/>	maximum benefit
Summer Crisis	<input type="text" value="\$0.00"/>	maximum benefit
Year-round Crisis	<input type="text" value="\$0.00"/>	maximum benefit

→ **4.14 Do you provide for equipment repair or replacement using crisis funds?**

Verify that your response here aligns with your response in 4.7 regarding non-working heating or cooling equipment (see Figure 23). If you selected “Yes” in 4.14, you should also select “Yes” in 4.7.

When a maximum is under \$1,000, ensure the maximum benefits provided are reasonable to cover equipment repair or replacement.

Operating a winter crisis program only would exclude repair/replacement of cooling equipment.

**Figure 23: 4.14 Do you provide for equipment repair or replacement using crisis funds?**

4.14 Do you provide for equipment repair or replacement using crisis funds?	
<input type="radio"/>	Yes
<input type="radio"/>	No

→ 4.15 Check appropriate boxes below to indicate type(s) of assistance provided.

Verify your responses here regarding the provision of heating or cooling equipment repair and replacement line up with the dates of operation for the crisis component in question 1.1 and the issuance of benefits in question 4.12 (see Figure 24).

If providing Equipment Repair and Replacement under Crisis Assistance, ensure that your policies comply with crisis assistance policies by meeting the 18-hour or 48-hour time lines. Your policies must also account for availability of interventions while processing the pre-inspection of any repair or replacement.

**Figure 24: 4.15 Check appropriate boxes below to indicate type(s) of assistance provided.**

If you answered "Yes" to question 4.14, you must complete question 4.15.			
4.15 Check appropriate boxes below to indicate type(s) of assistance provided.			
	Winter Crisis	Summer Crisis	Year-round Crisis
Heating system repair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Heating system replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cooling system repair	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Cooling system replacement	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Wood stove purchase	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pellet stove purchase	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Solar panel(s)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Utility poles / gas line hook-ups	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (Specify):	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

## Section 5: Weatherization Assistance

This section is required to be included for your Model Plan if you included this type of assistance in Section 1.

In this section, you will be asked to consider the following questions and provide answers:

- Do you require an Assets test?
- Do you have additional or differing eligibility policies for renters than home owners?
- Do you give priority to elderly, disabled, young children, or households with high energy burdens?
- What variables will you use to determine benefit levels?
- What are the minimum and maximum benefits, and does this include in-kind benefits (e.g., blankets, space heaters, fans, etc.)?
- Who is implementing the weatherization program?
- Is there a separate monitoring protocol for weatherization?
- What rules are used: Department of Energy (DOE), LIHEAP, or a mix?
- What weatherization measures do you provide?

Pay close attention to the information you provide in the following parts.

➔ **5.1 Designate the income eligibility threshold used for the Weatherization component**

If you are operating your program entirely under DOE Weatherization Assistance Program (WAP) rules or mostly under DOE rules, you can income eligibility up to 200% of the FPL (the eligibility threshold for WAP) for weatherization, (see Figure 25).

The LIHEAP statute allows LIHEAP grantees to set income eligibility at the greater of 150% of the FPL or 60% of the SMI.

**Figure 25: 5.1 Designate the income eligibility threshold used for the Weatherization component**

5.1 Designate the income eligibility threshold used for the Weatherization component				
Add	Household Size	Eligibility Guideline	Eligibility Threshold	Delete
1	Select	Select	0.00%	<input type="checkbox"/>

Add: 1

➔ **5.4 Is there a separate monitoring protocol for weatherization?**

If you selected “Yes” in 5.2 and “No” in 5.4, you may be contacted by OCS so that you can further explain how your weatherization program is monitored (see Figure 26).

**Figure 26: 5.4 Is there a separate monitoring protocol for weatherization?**

5.4 Is there a separate monitoring protocol for weatherization?  Yes  No

→ **5.7 Do you have additional/differing eligibility policies for**

If you selected “No” to either of these questions about eligibility requirements for renters, you may be contacted by OCS so that you can further explain how you will ensure you have the permission of the landlord to do the work on a rented unit (see Figure 27).

If receiving such permission of the landlord is a requirement, select “Yes” to these questions.

**Figure 27: 5.7 Do you have additional/differing eligibility policies for**

5.7 Do you have additional/differing eligibility policies for :	
Renters	<input type="radio"/> Yes <input type="radio"/> No
Renters living in subsidized housing?	<input type="radio"/> Yes <input type="radio"/> No

## Section 6: Outreach, 2605(b)(3) - Assurance 3, 2605(c)(3)(A)

This section is required to be included for all Model Plans.

Outreach is an important part of a successful LIHEAP Model Plan. This section asks you identify types of outreach activities you will conduct to ensure eligible households are made aware of all available LIHEAP assistance. This includes activities done by you (the grantee), as well as any applicable partners, subgrantees, utility vendors (using bill inserts), other community partners, or departments within your state, tribe, or territory.

Examples include the following:

- Posters/flyers
- Newspaper articles
- Broadcast media announcements
- Mailing inserts/brochures
- Communication during intakes
- Cross-program information for target groups

If you select “Other” as one of your options, please be sure to specify the other types of outreach you intend to perform.

## Section 7: Coordination, 2605(b)(4) - Assurance 4

This section is required to be included for all Model Plans.

Do you coordinate LIHEAP with other assistance available to low-income households? Coordination may help streamline the application process.

Examples include the following:

- Offering single applications that can be used for multiple programs
- Accepting intake referrals to/from other programs
- Sharing of an intake center so the client only has to go to one location

This section provides a lot of examples that you can use; but, if you have other plans, please include those plans at the bottom of the section.

Pay close attention to the information you provide in the following part.

➔ **7.1 Describe how you will ensure that the LIHEAP program is coordinated with other programs available to low-income households (TANF, SSI, WAP, etc.).**

If you transfer some of your LIHEAP funds to another agency for weatherization (see 5.2), your response here may describe how activities between the two agencies are coordinated to ensure clients receive services as seamlessly as possible (see Figure 28):

- Do the two agencies share subgrantees?
- Do they exchange lists of eligible clients?
- Is there a weatherization referral check box on the LIHEAP application?

**Figure 28: 7.1 Describe how you will ensure that the LIHEAP program is coordinated with other programs available to low-income households (TANF, SSI, WAP, etc.).**

7.1 Describe how you will ensure that the LIHEAP program is coordinated with other programs available to low-income households (TANF, SSI, WAP, etc.).	
<input type="checkbox"/>	Joint application for multiple programs
<input type="checkbox"/>	Intake referrals to/from other programs
<input type="checkbox"/>	One - stop intake centers
<input type="checkbox"/>	Other - Describe:
<div style="border: 1px solid #ccc; padding: 5px;"> <p style="text-align: center;"> <b>B</b> <i>I</i> <u>U</u>                       <span style="font-size: 0.8em;">☰ ☲ ☱</span> <span style="font-size: 0.8em;">↶ ↷ ↻ ↺</span> <span style="font-size: 0.8em;">📎 📄</span> </p> </div>	
<p>If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here. 📎</p>	

## Section 8: Agency Designation, 2605(b)(6) - Assurance 6

This section is required to be included only for State grantees and the Commonwealth of Puerto Rico.

It asks you to answer questions about the following agency roles and responsibilities:

- How is your agency categorized (e.g., Department of Commerce, Department of Human Services, Department of Environment, etc.)?
- Who determines client eligibility?
- Who processes benefit payments to gas and electric vendors?
- Who processes benefit payments to bulk fuel vendors?
- Who performs installation of weatherization measures?

Pay close attention to the information you provide in the following parts.

→ **8.6 What is your process for selecting local administering agencies?**

This question asks you to include a description of your formal subgrantee or local agency selection process (see Figure 29). Many States sub-grant to the same local agencies because the state has a legislative exemption or state regulations identify local agencies.

It is advisable that grantees maintain a local agency selection plan.

The LIHEAP office needs to be aware of a local agency selection plan to respond to this question.

**Figure 29: 8.6 What is your process for selecting local administering agencies?**



8.6 What is your process for selecting local administering agencies?

[Empty text input area]

**B** *I* U [List icons] [Undo] [Redo] [Insert] [Help]

➔ **8.9 If so, why?**

If you selected “Yes” in 8.8, indicating that you changed local administering agencies in the past year, you will need to explain why here (see Figure 30).

If an agency has closed or is under criminal investigation, this may prompt a conversation with OCS to further explain the situation:

- Were prior-year LIHEAP funds mismanaged or misspent?
- Was there any fraud discovered?
- Were other federal programs impacted (e.g., Community Services Block Grant [CSBG], TANF, etc.)?

**IMPORTANT:**

- Ensure any changes in subgrantees are communicated to the National Center for Appropriate Technology (NCAT) so they can update the Clearinghouse.
- Attach a copy of local agencies which you subcontract and your contact information for the upcoming year.

Figure 30: 8.9 If so, why?

8.9 If so, why?	
<input type="checkbox"/>	Agency was in noncompliance with grantee requirements for LIHEAP -
<input type="checkbox"/>	Agency is under criminal investigation
<input type="checkbox"/>	Added agency
<input type="checkbox"/>	Agency closed
<input type="checkbox"/>	Other - describe
<div style="border: 1px solid #ccc; padding: 5px;"> <p style="text-align: center;"> <b>B</b> <i>I</i> <u>U</u>                       <span style="font-size: 0.8em;">☰ ☷ ↶ ↷ ↻ ↺ ↻ ↺</span> </p> </div>	

## Section 9: Energy Suppliers, 2605(b)(7) - Assurance 7

This section is required to be included for all Model Plans.

### Payment Determinations

When dealing with energy suppliers (vendors), such as utility companies and bulk fuel companies, you will need to determine how payments are made and documented for each type of assistance:

- Is payment made directly to the home energy supplier?
  - Will there be a confirmation letter for the client?
  - How will clients be treated fairly by the utility vendor?
- Are funds provided to the client to pay the bill?

While it is not always an option, to maintain program integrity, it is recommended to pay the energy supplier and not the client whenever possible.

Pay close attention to the information you provide in the following parts.

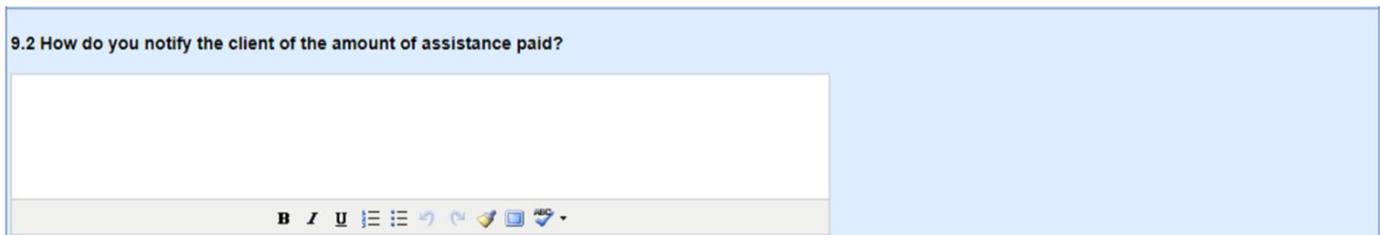
#### → 9.2 How do you notify the client of the amount of assistance paid?

Grantees are required to notify clients of their receipt of benefits and the amount (or their denial of services). Notification can be done in writing after the fact or verbally during the intake process.

If you enroll clients automatically without an application, your response to this question should address how those clients are notified (see Figure 31).

Specify the time frame in which you will provide notifications.

**Figure 31: 9.2 How do you notify the client of the amount of assistance paid?**



9.2 How do you notify the client of the amount of assistance paid?

[Empty text input area]

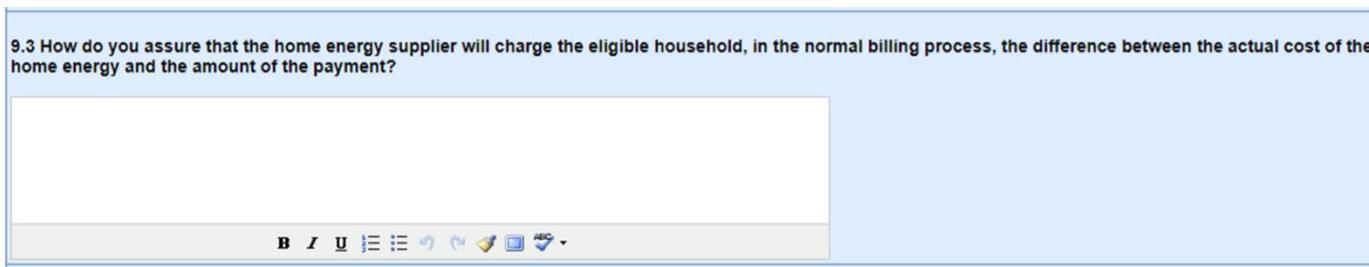
**B** *I* U [List] [List] [Undo] [Redo] [Image] [Link] [Dropdown]

→ **9.3 How do you assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment?**

Your response to this question should reference stipulations in a vendor agreement (see Figure 32). Please ensure these stipulations are specific and measurable; try to not use vague statements.

**Figure 32: 9.3 How do you assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment?**

9.3 How do you assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment?



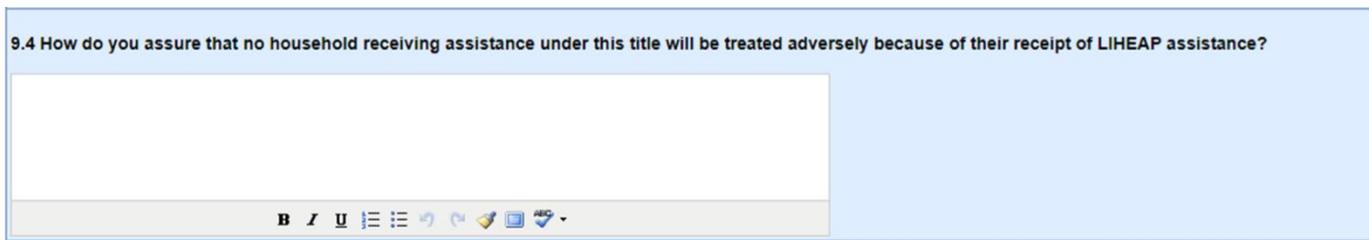
The screenshot shows a text input area with a rich text editor toolbar below it. The toolbar includes icons for bold (B), italic (I), underline (U), bulleted list, numbered list, undo, redo, link, unlink, and a dropdown menu with 'ABC'.

→ **9.4 How do you assure that no household receiving assistance under this title will be treated adversely because of their receipt of LIHEAP assistance?**

Your response to this question should reference stipulations in a vendor agreement (see Figure 33). Please ensure these stipulations are specific and measurable try to not use vague statements.

**Figure 33: 9.4 How do you assure that no household receiving assistance under this title will be treated adversely because of their receipt of LIHEAP assistance?**

9.4 How do you assure that no household receiving assistance under this title will be treated adversely because of their receipt of LIHEAP assistance?



The screenshot shows a text input area with a rich text editor toolbar below it. The toolbar includes icons for bold (B), italic (I), underline (U), bulleted list, numbered list, undo, redo, link, unlink, and a dropdown menu with 'ABC'.

## Fair Treatment

This section asks you to describe how you will help ensure that no household receiving LIHEAP assistance will be treated adversely.

## Section 10: Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10

This section is required to be included for all Model Plans.

### Accounting and Tracking of Funds

Audits are a required practice to ensure the funds for the Model Plan are accurately and appropriately allocated as you intend them to be. This section asks what types of audits you, as the grantee, receive throughout the year and what types of monitoring practices you will be using.

This section addresses question such as the following:

- Will your LIHEAP program be audited annually under the Single Audit Act?
- What types of annual audit requirements will you have in place for local administering agencies/district offices?

### Compliance

How will you monitor compliance with the policies and procedures?

- Internal program reviews?
- File sampling?
- Monitoring through central database?

Do you have corrective action plans in place?

- Do you have any subgrantees currently on a corrective action plan?

What is your monitoring schedule and protocol?

- If you do not monitor 100% of your subgrantees, how many do you intend to monitor in the FFY for this Model Plan and what does that schedule look like?
- What is your risk assessment process?
- What methods do you use to monitor your subgrantees?

Administration of LIHEAP funds will need to be monitored in compliance with the Uniform Administrative Guidance (UAG) issued by the Office of Management and Budget (OMB).

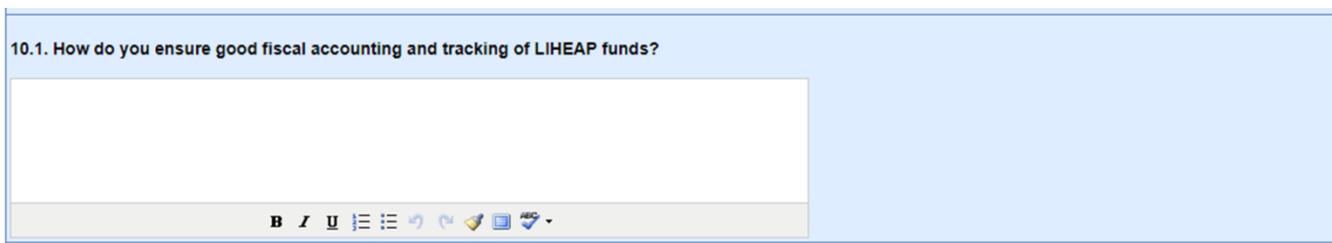
Pay close attention to the information you provide in the following parts.

→ **10.1 How do you ensure good fiscal accounting and tracking of LIHEAP funds?**

Responses to this question should include the following areas (see Figure 34):

- How you track subgrantee awards to ensure that funds are expended within the allowable contractual period
- How you track funds obligated by a second agency or department when funds are transferred for weatherization
- How you track vendor refunds
- How you track the obligation of funds at the subgrantee level
- How you track the separation of funding line items by component (e.g., crisis, heating, weatherization, etc.) and by federal FFY

**Figure 34: 10.1 How do you ensure good fiscal accounting and tracking of LIHEAP funds?**



10.1. How do you ensure good fiscal accounting and tracking of LIHEAP funds?

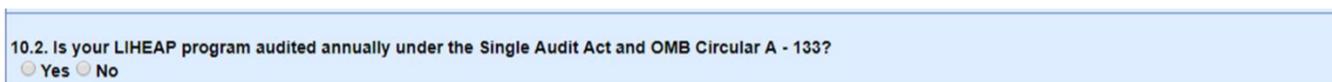
**B** *I* U [List] [List] [Link] [Link] [Image] [Image]

→ **10.2 Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A - 133?**

If you select “No,” this may prompt a conversation with OCS because the vast majority of grantees are required to have an annual audit in compliance with the Single Audit Act and the UAG (see Figure 35).

Many tribes have total funding of \$750,000 or more. All states have total funding of \$750,000 or more.

**Figure 35: 10.2 Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A - 133?**



10.2. Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A - 133?

Yes  No

→ **10.3 Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited fiscal year.**

Any findings you list may prompt a conversation with OCS to discuss the actions taken to resolve the issues (see Figure 36).

To help alleviate the need for such a discussion, try to add sufficient details in the Action Taken column for each item you list.

**Figure 36: 10.3 Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited fiscal year.**

10.3. Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited fiscal year. 

No Findings

Finding	Type	Brief Summary	Resolved?	Action Taken	Delete
1	Select ▼		Select ▼	Select ▼	<input type="checkbox"/>

Add Findings: 1 ▼ Add Delete Marked Rows

→ **10.7 Describe how you select local agencies for monitoring reviews.**

Be as specific as possible when explaining how you determine monitoring for site visits and desk reviews (see Figure 37).

Requirements of the OMB UAG stipulate that grantees must perform a risk assessment of subgrantees in order to determine the appropriate level/type of monitoring.

**Figure 37: 10.7 Describe how you select local agencies for monitoring reviews.**

10.7. Describe how you select local agencies for monitoring reviews.

**Site Visits:**

B I U ☰ ☰ ↶ ↷ ↺ ↻ 📄 🔍

**Desk Reviews:**

B I U ☰ ☰ ↶ ↷ ↺ ↻ 📄 🔍

→ **10.11 How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues?**

Be aware that if you list any number other than zero, you may be contacted by OCS to discuss monitoring and training/technical assistance provided to the subgrantees in question (see Figure 38).

To help alleviate the need for such a discussion, you can use the space at the bottom of this section to provide more information.

**Figure 38: 10.11 How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues?**

10.11. How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues?

→ **10.12 How many local agencies are currently on corrective action plans for financial accounting or administrative issues?**

Monitoring procedures vary widely among the states. States may conduct annual on-site reviews of every local administrative agency, or they may schedule these for every 2-3 years, depending on their budget and the number of local agencies. Some states do a risk assessment and review agencies determined to be at risk more often. In lieu of on-site reviews, states may conduct periodic desk reviews where they check agency data in a centralized database, if applicable, or check agency invoices, monthly reports, and other paperwork for inaccuracies and anomalies. In absence of subgrantees, tribal monitoring may involve internal review of client files, vendor invoices, delivery receipts, payments, regular meeting with fiscal staff, review of LIHEAP weatherization offices, weatherized homes, etc.

To help the discussion, you can use the space at the bottom of this section to provide as much detail as possible. Feel free to attach any supporting documentation. (see Figure 39).

**Figure 39: 10.12 How many local agencies are currently on corrective action plans for financial accounting or administrative issues?**

10.12. How many local agencies are currently on corrective action plans for financial accounting or administrative issues?

## Section 11: Timely and Meaningful Public Participation, 2605(b)(12) - Assurance 12, 2605(c)(2)

This section is required to be included for all Model Plans.

A LIHEAP Model Plan is only helpful if it meets the needs of the people receiving assistance. Focus on the meaningful part of this section. Make sure you are really giving people the opportunity to comment on the formulation of your Model Plan, and that you give those comments serious consideration before completing and submitting your Model Plan to OCS.

In this section, you will identify how you obtained input from the public in the development of your LIHEAP Model Plan.

Examples include the following:

- Public hearing(s) – REQUIRED FOR STATES
- Tribal Council meeting(s)
- Draft Model Plan posted to the Web site and available for comment
- Hard copy of Model Plan available for public view (e.g., newspapers, newsletters, radio via public service announcements) and comment
- Recorded comments from applicants

### IMPORTANT:

- **State grantees are required to hold public hearings, which use a formal process to obtain feedback from the community.**
- **Tribes and territories are not required to hold public hearings, but they are required to solicit public participation.**

Public participation has to occur before you submit your Model Plan.

Also, ensure you give the community enough time to provide meaningful input. You want there to be as much public participation as possible.

It is highly recommended that you do not hold a hearing or public meeting the week before your Model Plan is due, whenever possible. One week will most likely not give you enough time to consider all of the comments and use this information to further develop and change your Model Plan.

The questions in this section help get a sense of how well public hearings are advertised. If no one shows up or no comments are provided, you may need to think about increasing your marketing/outreach about the public hearing.

It is highly recommended that you use an official transcript format when documenting each meeting.

## Section 12: Fair Hearings, 2605(b)(13) - Assurance 13

This section is required to be included for all Model Plans.

### Right to Appeal

The LIHEAP statute requires that you have a process in place for fair hearings. When an application is denied or not processed in a timely manner, the applicant has the right to appeal.

How do you inform applicants of their right to an appeal?

- Pamphlets
- Described in their LIHEAP applications
- Posters in the intake office
- Included in their approval/denial letters (must not be the only communication of rights)

#### IMPORTANT:

- Clients must be made aware of their appeal rights before the application is processed.
- Printing appeal rights on only the approval or denial letters does not meet the requirements of the LIHEAP statute because applicants are not given enough opportunity to appeal when their applications are not processed on time or if they are not otherwise satisfied with the outcome of the application.

When do you inform applicants of their right to an appeal?

### Notices

Be clear as to what the applicants must do as part of the appeal process. Explicitly outline the information that will be required as part of the appeal process:

- What must the applicant do to appeal, and in what time frame?
- Under what circumstances can an applicant appeal?
- What are the procedures for an appeal process? (How do they get this information?)

## Section 13: Reduction of Home Energy Needs, 2605(b)(16) - Assurance 16

This section is required to be included for your Model Plan if you indicated these types of activities in Section 1.

Reducing the need for energy assistance frees up funds for others in need. Assurance 16 activities are used to reduce those home energy needs.

This section asks you to describe how you will use LIHEAP funds to provide services that encourage and enable households to reduce their home energy needs and, thereby, the need for energy assistance. Be sure to identify the impact you hope these activities will make.

If you included Assurance 16 activities in the prior year's Model Plan, identify the impact those activities had, how those outcomes were achieved, and how many households were served. There are many ways the impact of the Assurance 16 program can be measured. See training information from the FFY 2017 Grantee Training Conference.

### IMPORTANT:

- Outreach activities to promote LIHEAP and recruit applicants for LIHEAP assistance are not allowable under Assurance 16. For additional examples, please contact your liaisons to complete this section.

Pay close attention to the information you provide in the following parts.

➔ **13.3 Describe the impact of such activities on the number of households served in the previous Federal fiscal year.**

When you provide a description of the impact of the services, be sure to include more than just the number of households served (see Figure 40):

- What difference did the services make in the life of the client?
- What were you trying to accomplish with your Assurance 16 activities?
- How did you measure your success?

**Figure 40: 13.3 Describe the impact of such activities on the number of households served in the previous Federal fiscal year.**

13.3 Describe the impact of such activities on the number of households served in the previous Federal fiscal year.

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→ 13.4 Describe the level of direct benefits provided to those households in the previous Federal fiscal year.

“Level of direct benefit” means actual dollars provided to clients (see Figure 41).

This question is only applicable if the services being provided can be measured in cash.

**Figure 41: 13.4 Describe the level of direct benefits provided to those households in the previous Federal fiscal year.**

13.4 Describe the level of direct benefits provided to those households in the previous Federal fiscal year.

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## Section 14: Leveraging Incentive Program, 2607A

This section is not required to be included for all Model Plans, but it is encouraged.

The purpose of this section is to prepare and/or allow the grantees to plan for the Leveraging Fund Grant application for the following FFY. If HHS decides to fund the Leveraging Incentive Grant in the following fiscal year, but you have not completed this section of your model plan, you may not qualify for a Leveraging grant. Grantees are usually requested to submit a separate form to be considered for the Leveraging Incentive Grant.

### IMPORTANT:

- While funds are not always provided for this type of activity each year, it is a good practice to always fill out this section in the event that funds become available from HHS.
- Decisions to solicit for leveraging applications are usually made between November and January.
- Leveraging activities may help you to garner resources from non-federal sources.

Collaboration with other programs could help leverage resources to best service the clients:

- Do you plan to submit an application for the leveraging incentive program?
- What non-federal resources do you plan to leverage with LIHEAP?
- What are your instructions to third parties and/or local agencies for submitting LIHEAP leveraging resource information and retaining records?

When funds become available, there are specific criteria that must be met in order to be considered for the Leveraging Incentive Grant.

Leveraged funds must come from non-federal sources, and the maximum is only 0.8% of the total LIHEAP funds.

## Section 15: Training

This section is required to be included for all Model Plans.

### Policies and Procedures

Training (one-on-one or in a group setting) is a vital part of your LIHEAP Model Plan that outlines how policies and procedures are communicated for the following:

- Grantee Staff
- Local Agencies / Subgrantees (State grantees only)
- Utility Vendors

Tribes and territories do not need to complete the area 15.1b Local Agencies because they do not have subgrantees. However, they do need to complete the Grantee Staff and Utility Vendors areas of this section.

Determine the following for each group noted above:

- How often will you provide training?
- Will your training be formal or informal?
- Will it be in a designated location or on-site?

Pay close attention to the information you provide in the following part.

➔ **15.2 Does your training program address fraud reporting and prevention?**

Selecting “No” may prompt a conversation with OCS to discuss how you make your staff, subgrantees, and/or vendors aware of how to detect, prevent, and report fraud, waste, and abuse (see Figure 42).

To help alleviate the need for such a discussion, you can use the space at the bottom of this section to provide more information.

**Figure 42: 15.2 Does your training program address fraud reporting and prevention?**

15.2 Does your training program address fraud reporting and prevention?

Yes

No

---

## Section 16: Performance Goals and Measures, 2605(b)

This section is required for State grantees only.

Tribes and territories are not required to complete this section; but, they can complete it if they so choose.

What are you doing to prepare to report your LIHEAP performance measures?

How will you meet the data collection and reporting requirements of the four required LIHEAP performance measures?

Can you report on all measures? If not, which ones can you not report on right now, and what plans do you have in place to be able to report on these measures in the future?

If needed, technical assistance is provided through APPRISE for performance measurement reporting.

### IMPORTANT:

- Data collection for performance measures is required beginning October 1, 2015.
- OCS will not grant waivers to exempt any grantees from reporting on performance measures.

## Section 17: Program Integrity, 2605(b)(10)

This section is required to be included for all Model Plans.

This used to be a separate form; but, it is now integrated into your Model Plan. It includes a list of options rather than large amounts of free-form writing.

### Vendor Verification

To prevent fraud, verification is extremely important. This section asks you for a lot of information about the practices you have to prevent fraud, waste, and abuse. It asks about how you verify the identities of clients, as well as the validity of vendors, and how you ensure this information is accurate.

How will you verify the information provided, such as a legitimate business address and phone number?

- Better Business Bureau (BBB) report
- State Attorney General's consumer complaints
- Secretary of State's list of businesses registered and allowed to do business in that State
- Completion of a W-9

### Client Documents

How do you verify that clients are legitimately in need of LIHEAP assistance and determine that they are eligible to receive these services?

What documents does the applicant need to produce?

#### Documentation of Identity

- Social Security Card (SSC) (all members or just head of household)
- State or Tribal ID (all members or just head of household)
- Birth certificates for kids without other types of ID
- Tribal enrollment information
- Citizenship or legal residency record

#### Proof of Physical Residency

- Proof of ownership (homeowners)
- Signed Landlord agreement (renters)
- Current Utility Bill or Proof of New Service (ensures this is where they live)

---

Documentation of income for all household members 18+ yrs. of age

- Paystub
- Gross income statement
- Award letter from social security, unemployment insurance, pension fund, disability, etc.
- TANF or SNAP award information
- Per capita payments
- Zero income statement

### Privacy and Fraud Protection

You handle personally identifiable information (PII) on a daily basis. Setting up best practices for privacy protection is crucial for keeping that PII safe and away from those who would use that information for fraudulent purposes.

This section asks you to explain how you will keep this PII safe.

When creating your Model Plan, be sure to address these types of questions:

- How is release of information handled?
- What database safeguards will be in place?
- How are physical files stored (locked, secured)?
- How will you protect against fraudulent and improper payments?
- What will your investigation and prosecuting procedures be when fraud is suspected?
  - What steps will you take for a client who has committed fraud?
  - Will that client be considered for future eligibility?

Pay close attention to the information you provide in the following part.

➔ **17.2a Indicate which of the following forms of identification are required or requested to be collected from LIHEAP applicants or their household members.**

If your response indicates that no documentation of identity is required of anyone in the household, it may prompt a conversation with OCS to discuss program integrity (see Figure 43).

To help alleviate the need for such a discussion, you can use the space at the bottom of this section to provide more information about how you ensure duplicate payments are not made if ID is not verified.

**Figure 43: 17.2a Indicate which of the following forms of identification are required or requested to be collected from LIHEAP applicants or their household members.**

**17.2. Identification Documentation Requirements**

**a. Indicate which of the following forms of identification are required or requested to be collected from LIHEAP applicants or their household members.**

Type of Identification Collected	Collected from Whom?							X
	Applicant Only		All Adults in Household		All Household Members			
Social Security Card is photocopied and retained	<input type="checkbox"/> Required							
	<input type="checkbox"/> Requested							
Social Security Number (Without actual Card)	<input type="checkbox"/> Required							
	<input type="checkbox"/> Requested							
Government-issued identification card (i.e.: driver's license, state ID, Tribal ID, passport, etc.)	<input type="checkbox"/> Required							
	<input type="checkbox"/> Requested							
Other	Applicant Only Required	Applicant Only Requested	All Adults in Household Required	All Adults in Household Requested	All Household Members Required	All Household Members Requested		
1 <input style="width: 150px; height: 20px;" type="text"/>	<input type="checkbox"/>	<input type="checkbox"/>						

Add Other: 1 Add Delete Marked Rows

**b. Describe any exceptions to the above policies.**

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## Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters

This section is required to be included for all Model Plans.

Certifications that were previously required to be attached as separate documents are now included in the Model Plan (see Figure 44).

**Figure 44: Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters**

Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters	
<b>Certification Regarding Debarment, Suspension, and Other Responsibility Matters--Primary Covered Transactions</b>	
<b>Instructions for Certification</b>	
<ol style="list-style-type: none"> <li>1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.</li> <li>2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.</li> <li>3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.</li> <li>4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.</li> <li>5. The prospective lower tier participant agrees by submitting this proposal that, [[Page 33043]] should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.</li> <li>6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.</li> <li>7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.</li> <li>8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.</li> <li>9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.</li> </ol>	
<b>Certification Regarding Debarment, Suspension, Ineligibility an Voluntary Exclusion--Lower Tier Covered Transactions</b>	
<ol style="list-style-type: none"> <li>(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.</li> <li>(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.</li> </ol>	
<input type="checkbox"/> By checking this box, the prospective primary participant is providing the certification set out above.	

## Section 19: Certification Regarding Drug-Free Workplace Requirements

This section is required to be included for all Model Plans.

Certifications that were previously required to be attached as separate documents are now included in the Model Plan (see Figure 45).

### IMPORTANT:

- The Drug-Free Workplace Certification must list a physical address.
- An address that lists a P.O. Box is not acceptable.

Figure 45: Section 19: Certification Regarding Drug-Free Workplace Requirements

Section 19: Certification Regarding Drug-Free Workplace Requirements		
<p>This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645(a) (1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central point is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.</p> <p>Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)</p> <p>1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.</p> <p>2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may terminate the award under the Drug-Free Workplace Act.</p> <p>(c) The grantee may insert in the space provided below the step(s) for the performance of work done in connection with the specific grant.</p>		
<p>Place of Performance (Street address, city, county, state, zip code)</p>		
<input type="text"/>		
<p><b>* Address Line 1</b></p>		
<input type="text"/>		
<p><b>Address Line 2</b></p>		
<input type="text"/>		
<p><b>Address Line 3</b></p>		
<input type="text"/>	<input type="text"/>	<input type="text"/>
<p><b>* City</b></p>	<p><b>* State</b></p>	<p><b>* Zip Code</b></p>
<p>Check if there are workplaces on file that are not identified here.</p> <p>Alternate II. (Grantees Who Are Individuals)</p> <p>(a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;</p> <p>(b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.</p> <p>[55 FR 21690, 21702, May 25, 1990]</p> <p><input type="checkbox"/> By checking this box, the prospective primary participant is providing the certification set out above.</p>		

## Section 20: Certification Regarding Lobbying

This section is required to be included for all Model Plans.

Certifications that were previously required to be attached as separate documents are now included in the Model Plan (see Figure 46).

### IMPORTANT:

- **FOR STATES:** You must check the box at the bottom of this section for consent.
- **FOR TRIBES:** This section should still be included as a part of your plan; but, you **DO NOT** need to check the box at the bottom of the section for consent.

Figure 46: Section 20: Certification Regarding Lobbying

**Section 20: Certification Regarding Lobbying**

The submitter of this application certifies, to the best of his or her knowledge and belief, that:

(1) No Federal appropriated funds have been paid or will be paid, by or on behalf of the undersigned, to any person for influencing or attempting to influence an officer or employee of an agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with the awarding of any Federal contract, the making of any Federal grant, the making of any Federal loan, the entering into of any cooperative agreement, and the extension, continuation, renewal, amendment, or modification of any Federal contract, grant, loan, or cooperative agreement.

(2) If any funds other than Federal appropriated funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this Federal contract, grant, loan, or cooperative agreement, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions

(3) The undersigned shall require that the language of this certification be included in the award documents for all subawards at all tiers (including subcontracts, subgrants, and contracts under grants, loans, and cooperative agreements) and that all subrecipients shall certify and disclose accordingly. This certification is a material representation of fact upon which reliance was placed when this transaction was made or entered into. Submission of this certification is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required certification shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

**Statement for Loan Guarantees and Loan Insurance**

The undersigned states, to the best of his or her knowledge and belief, that:

any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

By checking this box, the prospective primary participant is providing the certification set out above.

[Previous Section](#) | [Save](#) | [View/Add Attachments](#) | [Validate](#) | [Next Section](#)

## Plan Attachments

These documents must be attached to the application in the OLDC (see Figure 47):

- Delegation Letter (required if someone other than the Governor or Chairman certified this report)
- Heating component benefit matrix (if applicable)
- Cooling component benefit matrix (if applicable)
- Minutes, notes, or transcripts of public hearing(s) (State grantees only)
- Carryover Report
- Household Report

Figure 47: Plan Attachments

PLAN ATTACHMENTS
The following documents must be attached to this application
<ul style="list-style-type: none"><li>• Delegation Letter is required if someone other than the Governor or Chairman Certified this Report.📎</li></ul>
<ul style="list-style-type: none"><li>• Heating component benefit matrix, if applicable📎</li></ul>
<ul style="list-style-type: none"><li>• Cooling component benefit matrix, if applicable📎</li></ul>
<ul style="list-style-type: none"><li>• Minutes, notes, or transcripts of public hearing(s).📎</li></ul>
<a href="#">Previous Section</a> <a href="#">Save</a> <a href="#">View/Add Attachments</a> <a href="#">Validate</a>

See the References section of this reference guide for a hyperlink to sample Delegation Letters.

**IMPORTANT:**

- Always include a Delegation Letter. You may use the same letter from the prior year if everything on the letter remains unchanged (e.g., delegator, delegate, or delegation process).
- If the Governor or Chairman has changed from last year, you will be required to include a new Delegation Letter.
- OCS will not accept your Model Plan if this letter has not been updated to reflect the change in Governor or Chairman.
- If there is an additional designee to sign or certify the plan, ensure that the letter includes the additional designee.

Tribal grantees who are currently working on developing a policy manual may include a draft of the manual as another attachment to the Model Plan. It is not a requirement; but, it is an easy way to get this information to OCS so they can provide helpful feedback in a timely manner.

Work on your policy manual will NOT be tied to the approval of your Model Plan.

## Using the Online Data Collection (OLDC)

In order to receive LIHEAP funds for the FFY, your Model Plan must be submitted in the OLDC by September 1.

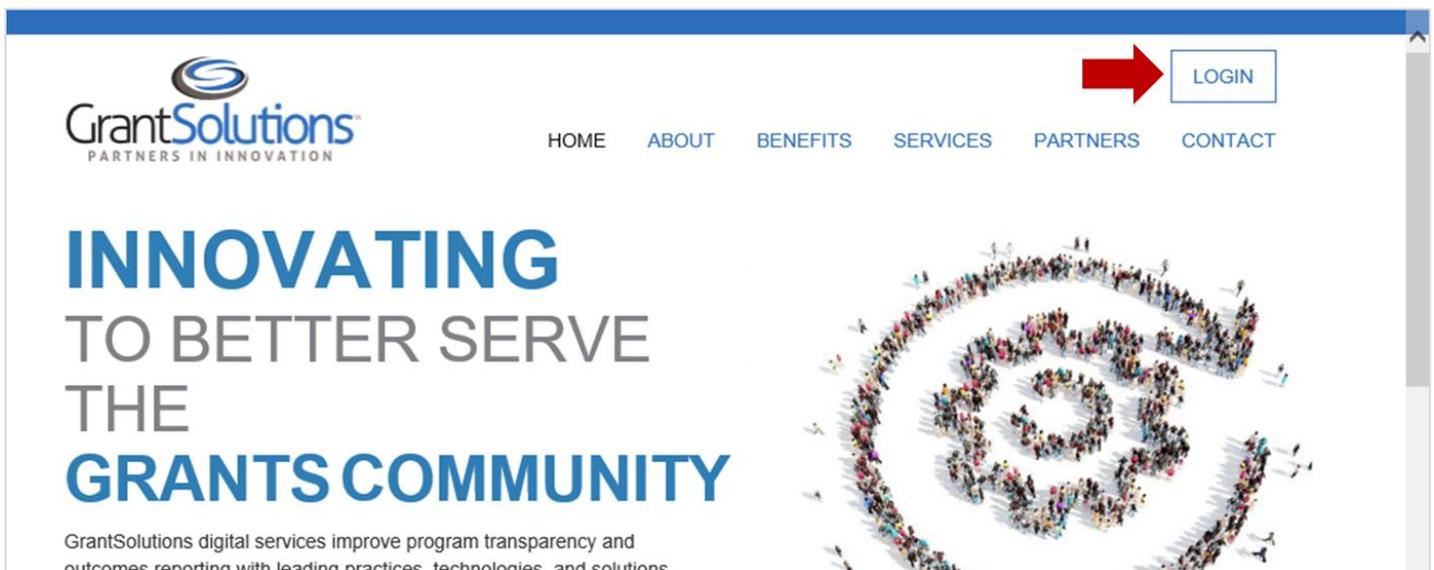
The preferred Web browsers to use for accessing the OLDC are Google Chrome or Mozilla Firefox.

### Logging into the OLDC

To log into the OLDC, follow these steps:

1. Navigate to the Grant Solutions homepage: <https://home.grantsolutions.gov/home/> (see Figure 48).
2. Click the **LOGIN** button.

Figure 48: Grant Solutions Homepage



#### IMPORTANT:

- When using the OLDC, use Internet Explorer in compatibility mode.

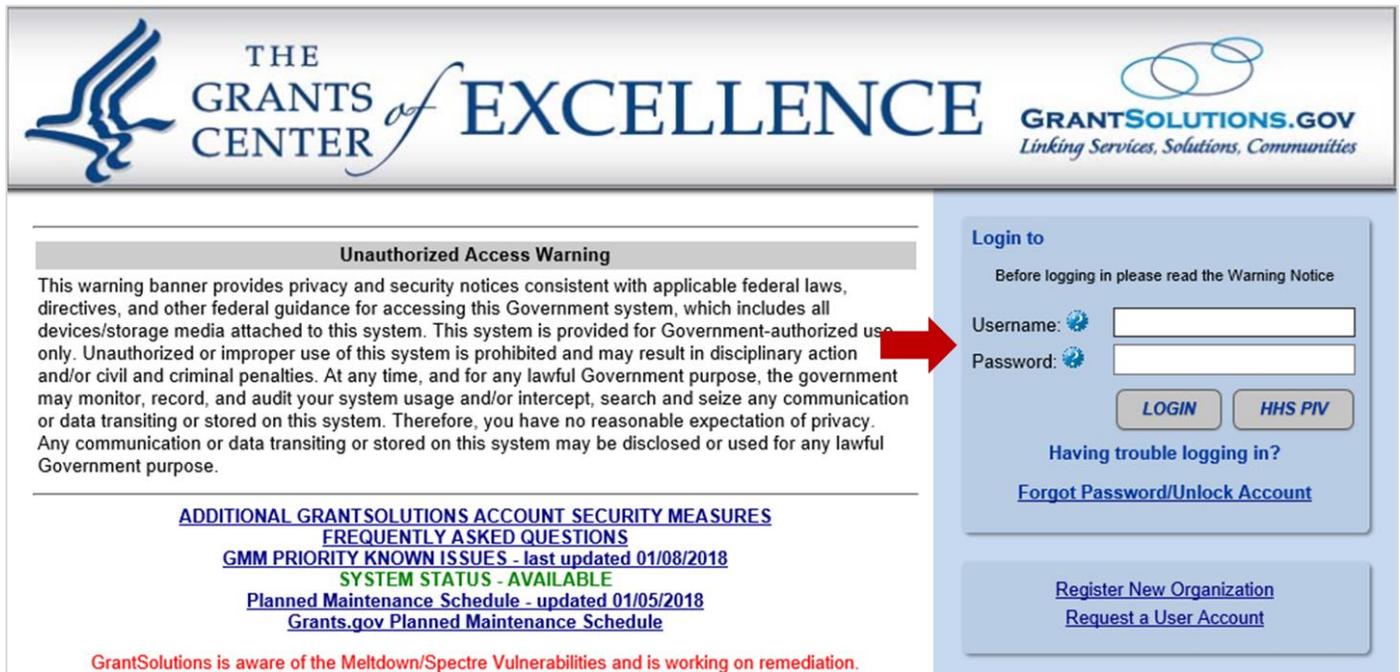
3. Type your username and password in the appropriate fields (see Figure 49).

If you have forgotten your password, click the *Forgot Password/Unlock Account* hyperlink below the **LOGIN** button and follow the prompts.

If you do not have a username and password for the OLDC, click the *Register New Organization* hyperlink or the *Request a User Account* hyperlink below the login area of this page to set up a new username and password.

4. Click the **LOGIN** button.

Figure 49: Log into Grant Solutions



5. Click the *OLDC* hyperlink (see Figure 50).

Figure 50: *OLDC* Hyperlink



## Accessing the Model Plan Form

To access the Model Plan form, follow these steps:

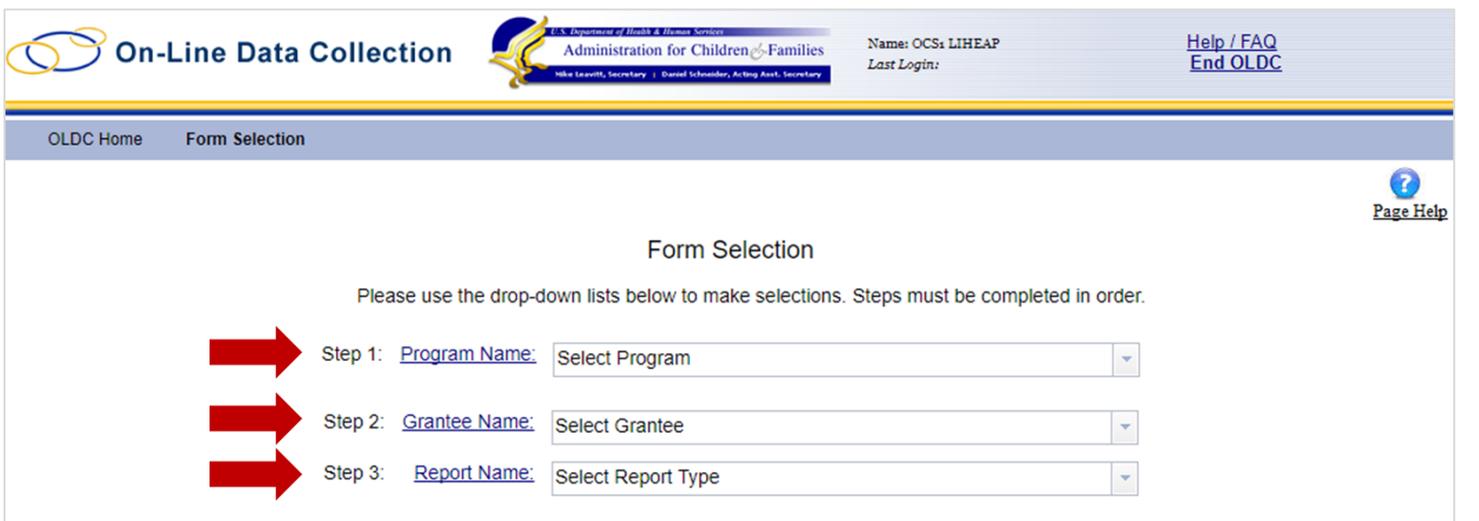
1. Click the *Report Form Entry* hyperlink (see Figure 51).

Figure 51: Report Form Entry Hyperlink



2. Select “Low Income Home Energy Assistance” from the from the **Program Name** drop-down menu field (see Figure 52).
3. Select your grantee from the **Grantee Name** drop-down menu field (if applicable).
4. Select “Model Plan (AFC-112)” from the **Report Name** drop-down menu field.

Figure 52: Select the Model Plan Report



After making these three selections, the page will display any previous Model Plans you have submitted or are currently working (see Figure 53).

5. You can select one of the existing reports by clicking the corresponding radio button.
6. Select one of the options from the **Select Action** drop-down menu field to continue:
  - New / Edit / Revise Report
  - View / Print / Status / Approval Report
  - Print Latest Version (HTML)
  - View Latest Report
  - Clone Report

The Clone Report option allows you to copy information from a previous Model Plan and use it as the foundation for the plan you intend to submit for the upcoming FFY.

**Figure 53: Model Plan Reports and Actions**

Step 1: Program Name:

Step 2: Grantee Name:

Step 3: Report Name:

Step 4: Report Period:

	Reporting Period	Type	Report Status
<input checked="" type="radio"/>	10/01/2017 - 09/30/2018	Annual	Submission Accepted by CO
<input type="radio"/>	10/01/2016 - 09/30/2017	Annual	Submitted with Warnings (Revision #1)
<input type="radio"/>	10/01/2015 - 09/30/2016	Annual	Submission Accepted by CO (Revision #2)
<input type="radio"/>	10/01/2014 - 09/30/2015	Annual	Submission Accepted by CO (Revision #1)
<input type="radio"/>	10/01/2013 - 09/30/2014	Annual	

Step 5: Select Action: 

Select Action

New / Edit / Revise Report

View / Print / Status / Approve Report

Print Latest Version (HTML)

View Latest Report

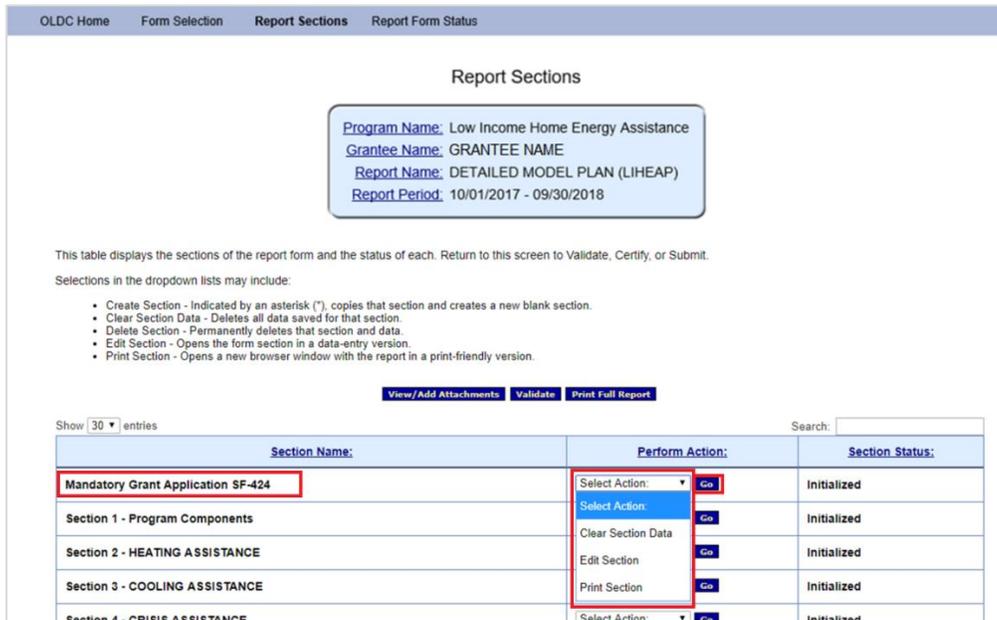
Clone Report

## Navigating the Model Plan Form

There are a couple of ways to navigate to the various sections of the Model Plan form.

The first way is to select an action from the appropriate drop-down menu for a specific section on the *Report Sections* page (see Figure 54). This will take you directly to that section of the Model Plan form.

**Figure 54: Reports Sections – Section Navigation – Action**



Report Sections

Program Name: Low Income Home Energy Assistance  
 Grantee Name: GRANTEE NAME  
 Report Name: DETAILED MODEL PLAN (LIHEAP)  
 Report Period: 10/01/2017 - 09/30/2018

This table displays the sections of the report form and the status of each. Return to this screen to Validate, Certify, or Submit.  
 Selections in the dropdown lists may include:

- Create Section - Indicated by an asterisk (\*), copies that section and creates a new blank section.
- Clear Section Data - Deletes all data saved for that section.
- Delete Section - Permanently deletes that section and data.
- Edit Section - Opens the form section in a data-entry version.
- Print Section - Opens a new browser window with the report in a print-friendly version.

View/Add Attachments    Validate    Print Full Report

Show 30 entries    Search:

Section Name:	Perform Action:	Section Status:
Mandatory Grant Application SF-424	Select Action: <input type="button" value="Go"/>	Initialized
Section 1 - Program Components	Select Action: <input type="button" value="Go"/>	Initialized
Section 2 - HEATING ASSISTANCE	Clear Section Data: <input type="button" value="Go"/>	Initialized
Section 3 - COOLING ASSISTANCE	Edit Section: <input type="button" value="Go"/>	Initialized
Section 4 - CRISIS ASSISTANCE	Print Section: <input type="button" value="Go"/>	Initialized
Section 5 - WEATHERIZATION ASSISTANCE	Select Action: <input type="button" value="Go"/>	Initialized

The second way is to select an option from the **Report Sections** drop-down menu field (see Figure 55). This function is available when you are already on one of the pages for a section of the Model Plan form.

**Figure 55: Report Sections – Section Navigation – Section Selection**



On-Line Data Collection    Administration for Children & Families    Name: OCS LIHEAP    Help / FAQ    End OLDC

OLDC Home    **Report Sections**    Report    Report Form Status

Go To Report Sections

- Mandatory Grant Application SF-424
- Section 1 - Program Components
- Section 2 - HEATING ASSISTANCE
- Section 3 - COOLING ASSISTANCE
- Section 4 - CRISIS ASSISTANCE
- Section 5 - WEATHERIZATION ASSISTANCE
- Section 6 - Outreach, 2605(b)(3) - Assurance 3, 2605(c)(3)(A)
- Section 7 - Coordination, 2605(b)(4) - Assurance 4
- Section 8 - Agency Designation, 2605(b)(6) - Assurance 6
- Section 9 - Energy Suppliers, 2605(b)(7) - Assurance 7
- Section 10 - Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10
- Section 11 - Timely and Meaningful Public Participation, 2605(b)(12) - Assurance 12, 2605(c)(2)
- Section 12 - Fair Hearings, 2605(b)(13) - Assurance 13
- Section 13 - Reduction of home energy needs, 2605(b)(16) - Assurance 16
- Section 14 - Leveraging Incentive Program, 2607A
- Section 15 - Training
- Section 16 - Performance Goals and Measures, 2605(b)
- Section 17 - Program Integrity, 2605(b)(10)
- Section 18 - Certification Regarding Debarment, Suspension, and Other Responsibility Matters
- Section 19 - Certification Regarding Drug-Free Workplace Requirements
- Section 20 - Certification Regarding Lobbying
- Assurances
- Plan Attachments

U.S. DEPARTMENT OF HEALTH & HUMAN SERVICES    August 1987, revised 05/92, 02/95, 03/98, 12/98, 11/01    OMB Clearance No.: 0970-0075    Expiration Date: 09/30/2020

1.a. Type of Submission:    Application/Plan/Funding Request?    1.d. Version:

At the top of each Model Plan form section page, you will see a status bar that indicates where you are in the submission/update process (see Figure 56). You also have the following buttons available at the top and bottom of each page: **Save**, **View/Add Attachments**, **Validate**, and **Next Section**.

Figure 56: Status Bar and Functions

Report Progress





U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES  
ADMINISTRATION FOR CHILDREN AND FAMILIES

August 1987, revised 05/92,02/95,03/96,12/98,11/01  
OMB Clearance No.: 0970-0075  
Expiration Date: 09/30/2020

**LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP)  
MODEL PLAN  
SF - 424 - MANDATORY**

<p><b>* 1.a. Type of Submission:</b></p> <p><input checked="" type="radio"/> Plan</p>	<p><b>* 1.b. Frequency:</b></p> <p><input checked="" type="radio"/> Annual</p>	<p><b>* 1.c. Consolidated Application/Plan/Funding Request?</b></p> <p><b>Explanation:</b></p>	<p><b>* 1.d. Version:</b></p> <p><input type="radio"/> Initial  <input type="radio"/> Resubmission  <input type="radio"/> Revision  <input type="radio"/> Update</p>
		<p><b>2. Date Received:</b></p>	<p><b>State Use Only:</b></p>
		<p><b>3. Applicant Identifier:</b></p>	<p><b>5. Date Received By State:</b></p>
		<p><b>4a. Federal Entity Identifier:</b></p>	<p><b>6. State Application Identifier:</b></p>
		<p><b>4b. Federal Award Identifier:</b></p>	

**7. APPLICANT INFORMATION**

any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)

**\*\*I Agree**

\*\* The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

<p><b>18a. Typed or Printed Name and Title of Authorized Certifying Official</b></p>	<p><b>18c. Telephone (area code, number and extension)</b></p>
<p><b>18b. Signature of Authorized Certifying Official</b></p>	<p><b>18d. Email Address</b></p>
	<p><b>18e. Date Report Submitted (Month, Day, Year)</b></p>

**Attach supporting documents as specified in agency instructions.**



## Cloning a Report

This feature allows you to populate the fields of a current year’s Model Plan form with the information from a prior year’s Model Plan form.

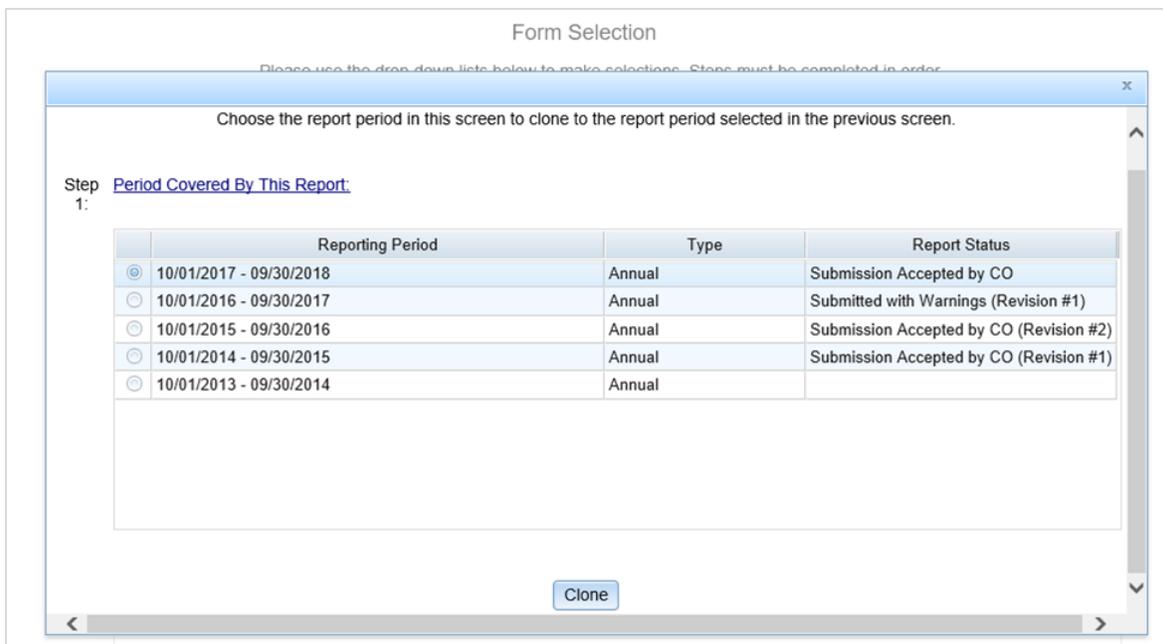
**IMPORTANT:**

- This process will only work if you have NOT yet initialized your current FY Model Plan.
- If you already started working on the current FY Model Plan, you will need to delete that Model Plan before you can go through the cloning process.

To copy all of the information from your prior FY Model Plan into your new FY Model Plan, follow these steps:

1. Log into OLDC.
2. Navigate to the *Form Selection* page to select the Model Plan form (see the Accessing the Model Plan Form section in this reference guide).
3. Click the radio button next to the reporting period dates of your prior FY Model Plan.
4. Select “Clone Report” from the **Select Action** drop-down menu field.
5. Click the **Enter** button.
6. You will be asked to verify which report you wish to clone (see Figure 57).
7. Click the radio button next to the reporting period dates of your prior FY Model Plan.
8. Click the **Clone** button.

**Figure 57: Verify Report to Clone**



Form Selection

Please use the drop-down lists below to make selections. Steps must be completed in order.

Choose the report period in this screen to clone to the report period selected in the previous screen.

Step 1: [Period Covered By This Report:](#)

	Reporting Period	Type	Report Status
<input checked="" type="radio"/>	10/01/2017 - 09/30/2018	Annual	Submission Accepted by CO
<input type="radio"/>	10/01/2016 - 09/30/2017	Annual	Submitted with Warnings (Revision #1)
<input type="radio"/>	10/01/2015 - 09/30/2016	Annual	Submission Accepted by CO (Revision #2)
<input type="radio"/>	10/01/2014 - 09/30/2015	Annual	Submission Accepted by CO (Revision #1)
<input type="radio"/>	10/01/2013 - 09/30/2014	Annual	

If you have followed the above steps properly, you will see a pop-up message indicating that your report has been cloned successfully.

9. Click the **OK** button.
10. Your new FY Model Plan will display with all of the information from the prior FFY Model Plan already populated.
11. **REMEMBER TO SAVE:** Once you have completed the cloning process, open any section of your new FFY model Model Plan, and click the **Save** button at the top of the screen. This will ensure that all the data that has just been transferred into your plan will be saved.

### IMPORTANT:

- If you close your browser session with the OLDC before saving the information you cloned, you will lose all of the cloned information. When you go back to view your plan, it will be blank.
- Clicking the Save button in any one of the sections will save the information in all of the sections of your Model Plan.

12. Update your answers to the following required questions and any other questions in your Model Plan to reflect new or revised plans from the prior year.
  - a. Section 8: Question 8.8
  - b. Section 10: Questions 10.3 and 10.9 - 10.12
  - c. Section 11: Questions 11.1 - 11.6 (all questions in Section 11)
  - d. Section 12: Questions 12.1 - 12.3
  - e. Section 13: Questions 13.1 - 13.6 (all questions in Section 13)
  - f. Section 14: Questions 14.1 and 14.3

Even though you have the option to copy your Model Plan from a prior year, you are expected to review every section of information to ensure the information is up-to-date and as accurate as possible.

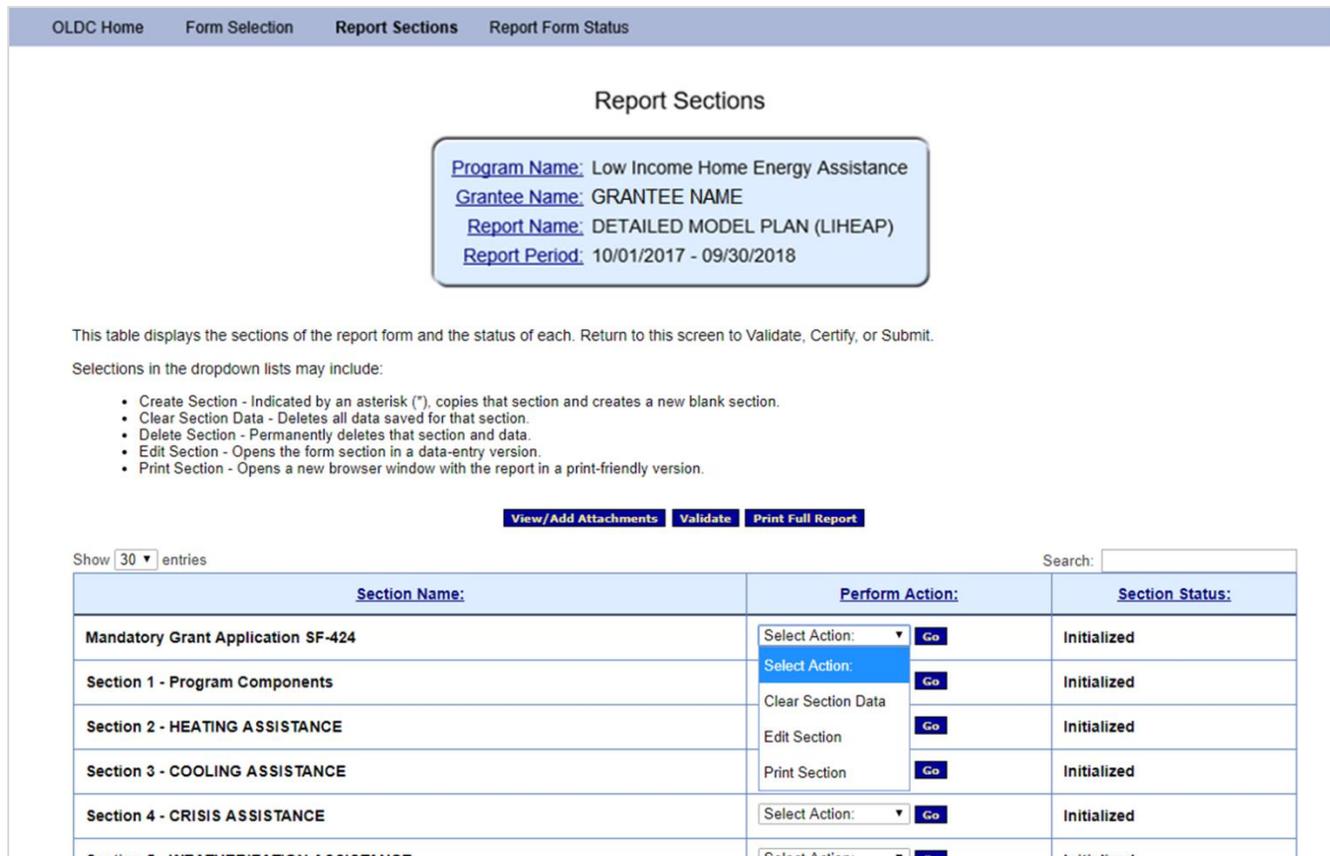
## Revising a Plan in the OLDC

This feature allows you to update information in your current year’s Model Plan after it has been submitted.

To edit your current FFY Model Plan, follow these steps:

1. Log into the OLDC and navigate to the *Form Selection* page to select the Model Plan form (see the Accessing the Model Plan Form section in this reference guide).
2. Click the radio button next to the reporting period dates of your current FY Model Plan.
3. Select “New / Edit / Revise Report” from the **Select Action** drop-down menu field.
4. Click the **Enter** button.
5. Locate the section you wish to update.
6. Select the appropriate action from the **Perform Action** drop-down menu field.
7. Click the **Go** button (see Figure 58).

**Figure 58: Select a Section to Edit**



OLDC Home   Form Selection   **Report Sections**   Report Form Status

### Report Sections

Program Name: Low Income Home Energy Assistance  
Grantee Name: GRANTEE NAME  
Report Name: DETAILED MODEL PLAN (LIHEAP)  
Report Period: 10/01/2017 - 09/30/2018

This table displays the sections of the report form and the status of each. Return to this screen to Validate, Certify, or Submit.

Selections in the dropdown lists may include:

- Create Section - Indicated by an asterisk (\*), copies that section and creates a new blank section.
- Clear Section Data - Deletes all data saved for that section.
- Delete Section - Permanently deletes that section and data.
- Edit Section - Opens the form section in a data-entry version.
- Print Section - Opens a new browser window with the report in a print-friendly version.

View/Add Attachments
Validate
Print Full Report

Show  entries Search:

Section Name:	Perform Action:	Section Status:
Mandatory Grant Application SF-424	Select Action: <input type="button" value="Go"/>	Initialized
Section 1 - Program Components	Select Action: <input type="button" value="Go"/>	Initialized
Section 2 - HEATING ASSISTANCE	Clear Section Data <input type="button" value="Go"/>	Initialized
Section 3 - COOLING ASSISTANCE	Edit Section <input type="button" value="Go"/>	Initialized
Section 4 - CRISIS ASSISTANCE	Print Section <input type="button" value="Go"/>	Initialized
Section 5 - WEATHERIZATION ASSISTANCE	Select Action: <input type="button" value="Go"/>	Initialized

8. Make your edits to the section.
9. Click the **Save** button, located at the bottom of the page.

---

## References

LIHEAP AT 2018-01 Model Plan Application for FY 2018 Funding:

- <https://www.acf.hhs.gov/ocs/resource/liheap-at-2018-01-model-plan-application-for-fy2018-funding>

LIHEAP Web Site:

- <https://www.acf.hhs.gov/ocs/programs/liheap>

LIHEAP Model Plans and Program Integrity Assessments:

- <http://www.liheapch.acf.hhs.gov/Tribes/trplans.htm>

Examples of LIHEAP Grantees' Policies and Plans:

- <https://liheapch.acf.hhs.gov>

LIHEAP Grantee Resources:

- <https://www.acf.hhs.gov/ocs/resource/grantee-resources>

Webinars on the Performance Measurement Web Site:

- <https://liheappm.ncat.org/user>

Tribal Plans, Manuals, and Delegation Letters:

- <https://liheapch.acf.hhs.gov/Tribes/trplans.htm>

Tribal Statutes and Regulations:

- [https://liheapch.acf.hhs.gov/Tribes/admin\\_statute.htm](https://liheapch.acf.hhs.gov/Tribes/admin_statute.htm)

LIHEAP State and Territory Plans, Manuals, and Delegation Letters:

- <https://liheapch.acf.hhs.gov/stateplans.htm>

LIHEAP Liaisons:

- <https://www.acf.hhs.gov/ocs/programs/liheap>
- <https://www.acf.hhs.gov/ocs/resource/division-of-energy-assistance-federal-staff>

## Glossary

Acronym	Definition
<b>CSBG</b>	Community Services Block Grant
<b>DOE</b>	Department of Energy
<b>FPG</b>	Federal Poverty Guidelines
<b>FPL</b>	Federal Poverty Level
<b>FFY</b>	Federal Fiscal Year
<b>HHS</b>	Department of Health and Human Services
<b>LIHEAP</b>	Low Income Home Energy Assistance Program
<b>NCAT</b>	National Center for Appropriate Technology
<b>OCS</b>	Office of Community Services
<b>OLDC</b>	Online Data Collection
<b>OMB</b>	Office of Management and Budget
<b>SMI</b>	State Median Income
<b>SNAP</b>	Supplemental Nutrition Assistance Program
<b>SSA</b>	Social Security Administration
<b>SSC</b>	Social Security Card
<b>SSI</b>	Supplemental Security Income
<b>TANF</b>	Temporary Assistance for Needy Families
<b>UAG</b>	Uniform Administrative Guidance
<b>WAP</b>	Weatherization Assistance Program for Low Income Persons
<b>WIC</b>	Women, Infants, and Children

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## Appendix

The following pages contain details about the LIHEAP Lifecycle.

## **Low Income Home Energy Assistance Program (LIHEAP)**

Division of Energy Assistance  
Office of Community Services  
Administration for Children and Families  
U.S. Department of Health and Human Services

### ***Purpose:***

The purpose of LIHEAP is to assist households with low incomes, particularly those with the lowest incomes that pay a high proportion of household income for home energy, primarily in meeting their immediate home energy needs.

### ***Legislative Authority:***

Title XXVI of the Omnibus Budget Reconciliation Act of 1981 (Public Law 97-35), as amended.

### ***Eligible Applicants:***

States, the District of Columbia, federally and state recognized tribes and tribal organizations (including Alaska native villages), and U.S. territories may apply to HHS for direct LIHEAP funding. All 50 states, the District of Columbia, five U.S. territories, and over 150 tribes and tribal organizations receive LIHEAP grants each year.

### ***Target Population:***

Grantees must target benefits to households with low income. They must cap income-eligibility for LIHEAP's fuel assistance and crisis benefits at (1) no more than the greatest of 150% of the Federal Poverty Guidelines (FPG) or 60% of the State Median Income; and (2) no less than 110% of FPG. They must also give higher benefits to households with the greatest home energy need in relation to household income and number of household members. Grantees also must target benefits to households with elderly members, disabled members, and/or households with young children.

***Uses:*** Grantees must provide crisis assistance through at least March 15. They have the option to provide home cooling, weatherization, and/or energy-related low-cost home repairs or replacements.

***Block Grant:*** Congress established the formula for distributing funds based primarily on each state's weather, fuel prices, and low income population. Home energy is defined

as a source of space-heating or space-cooling in residential dwellings. Grantees can use funds for heating and/or cooling costs as well as up to 15% of their funding (or 25% with a waiver) for weatherization assistance and 5% for Assurance 16 activities.

Grantees must provide crisis assistance through at least March 15. They have the option to provide furnace repairs or replacements, as well as use crisis funds for disaster relief assistance.

**Leveraging Incentive Program:** The law allows HHS to award supplemental LIHEAP funding to current grantees that used non-federal resources with their programs in the prior year.

**Residential Energy Assistance Challenge Program (REACH):** The law allows HHS to award supplemental LIHEAP funding for current grantees to receive competitive grants to implement through local community-based agencies innovative plans to help LIHEAP eligible households reduce their home energy vulnerability.

**Emergency Contingency Funds:** If appropriated by Congress, the President may release these funds to assist with the home energy needs arising from an emergency situation, such as a natural disaster. The funds may be allocated to one or more grantees, or to all grantees, based on criteria appropriate to the emergency. Such criteria usually relate to extreme weather conditions or energy price increases. The distribution of funds is based on the degree to which the grantees were impacted by the emergency situation.

### **LIHEAP Lifecycle:**

LIHEAP, like any other federal grants, follows a lifecycle from the time each grantee receives their annual allocation until the end of the federal fiscal year. However, the process and timeline could vary depending on their budget cycle, grantees' own rules, types of program administration and seasons. LIHEAP can be viewed as an emergency program that usually operates from October 1 to March 15 for heating and crisis assistance and from March 15 to September 30 for cooling and summer crisis assistance. LIHEAP-funded weatherization program may operate within these time frames. Some grantees choose to operate year-round crisis assistance programs.

Once funds are received from HHS, many state grantees further distribute their funds as a subgrant or subcontract to community action agencies, county or local government entities and non-profit organizations. Grantees may choose allocate up to 15% of their award for LIHEAP weatherization purposes within their department or to a sub-recipient agency.

Grantees may plan their program prior to submission of their LIHEAP Plan and associated documents to HHS and go through a lifecycle. The lifecycle may include the following:

#### Low Income Home Energy Assistance Program Lifecycle



#### Examples of LIHEAP Lifecycle:

##### ***Guidance and Policy Development:***

As a block grant, HHS depends on grantees' interpretation of the statute through the development of their own policies and procedures, unless it is clearly erroneous. Grantees' policies could be a combination of federal and state/tribal/territorial rules.

Policy development is a dynamic process and involves different stakeholders that may include LIHEAP household recipients, local agency providers (subgrantees of LIHEAP funds), partner agencies (state and local), energy vendors (regulated and unregulated), and grantees' internal partners and legislators.

HHS expects that the states, tribes and territories as the direct grantees of the LIHEAP funds will create the policies and administer the program accordingly. This may involve enforcing those policies at the subgrantee level. Any significant change in a grantee's

LIHEAP Plan must seek public comments (required by all grantees) and public hearing (required by state only). An example of this would be the LIHEAP weatherization waiver. A grantee may choose to submit a written waiver request to HHS to increase their LIHEAP weatherization allocation up to 25% of their award. However public input must be sought prior to submitting a written request to OCS.

Policy topics mirror the type of program components that each grantee has decided to administer. Examples of topics that could be covered are discussed in Section C of the LIHEAP Resource Guide.

The output of this lifecycle is a policy and standard operations document that serves as a guidance by the grantees' staff and management (program, fiscal and monitoring) as well as by the federal monitors and the public at large.

### ***Plan Development and Public Participation***

Each year, state, tribal and territorial grantees are required to submit a LIHEAP Plan to HHS as a condition to receive funds. The plan requires that grantees certify the 16 required Assurances and Certifications. Plans are due to the Division of Energy Assistance (DEA) annually by September 1 through the Online Data Collection (OLDC) system in Grant Solutions.

The LIHEAP Model Plan format is an Office of Management and Budget (OMB) approved form and consists of the following: SF 424 and twenty (20) sections that includes the Program Integrity Checklist, Certifications, and Attachments. Only the Chief Executive of a grantee such as a current Governor or Tribal Chairperson must sign the plan unless a written delegation of authority has been submitted along with the plan. The purposes of the model plan are the following:

1. Grantees submit an application (for funding) required under Sections 2605(a)(1) and (c)(1) of the LIHEAP statute
2. Provide Assurances to HHS that grantees will administer the LIHEAP grant in accordance with federal LIHEAP statutes, rules and regulations.
3. Outline the LIHEAP components for consistent, accurate, and timely provision to household applicants.
4. Set clear guidelines to which household recipients and LIHEAP staff can be held accountable.
5. Ensure that recipients are being treated fairly.
6. Tool to easily and efficiently train new staff.
7. A grant document to assist during transition of staff and management.
8. Comply with HHS Program Integrity and other fiscal requirements.

The LIHEAP plan demonstrates grantees' LIHEAP operational design both programmatically and fiscally and must be consistent with their approved policies and

procedures. By submitting the LIHEAP Plan, grantees certify that they comply with LIHEAP's 16 Assurances.

Successful Plan is often the result of significant cross-departmental and stakeholders' dialogue. At a minimum, planning should include input from the grantee's intra- and inter- organizations, (such as the program and fiscal divisions, subgrantee association, LIHEAP weatherization office and the stakeholders that would benefit from the program).

Grantees are required to conduct a **timely** and **meaningful** public participation process and/or public hearing. The annual plan is shared with the public and other stakeholders to engage them to review and comment on grantee's important policies, procedures and program components. A timely and well recorded public hearing is held prior to the submission of the annual plan to HHS.

### ***Program Operations:***

LIHEAP's program operations phase is in line with the approved LIHEAP Plan. It is the process of implementing the strategic goals, objectives and program components set forth in the plan within the timeline that grantees have set for the current year. Operational or program period could be based on federal, fiscal or calendar year.

This phase includes (not listed in any particular order):

- hiring and training of staff;
- outreach to past and new LIHEAP households;
- selection of energy vendors and executing vendor agreements;
- managing subgrantees through grant and or contract agreements;
- intake, processing of applications and eligibility determination;
- working with vendors and other leveraged resources;
- issuing benefits in accordance to their approved benefit matrix;
- responding to request for appeals and fair hearing; and
- tracking of data for HHS reporting and evaluation purposes.

There are other activities involved in this phase which largely depend on the funds that each grantee receives, the size and types of their program components, and the number of households that they serve.

### ***Fiscal Operations:***

The LIHEAP Plan is both the first and the last step in preparing an operating budget request. As the first step, the operations plan provides a tool for resource allocation; as

the last step, the percentages of the fund allocations may be modified to reflect policy decisions or financial changes made during the budget development process.

The budget development process should be a partnership between the program and the fiscal staff. The program staff advise the fiscal staff on how to obligate the funds as required by the LIHEAP statute as soon as grantees receive the grant award. Setting up of the budget and obligation differs for each grantee and are guided by their state or tribal regulations.

In this phase, program and fiscal staff work to issue benefits to eligible households. Issuance of LIHEAP benefits are mostly done through the approved energy vendors, especially for regulated vendors. The process could be very different with unregulated vendors. Grantees should specify in their local policy how they will operate with unregulated vendors.

The fiscal staff should also reconcile and track refunds from vendors. Throughout this phase, tracking of funds is important to ensure that benefits are issued efficiently and timely. Tracking also helps to avoid fraud and abuse by ensuring that funds are spent during the appropriate period, that they are spent for the purpose for which they are intended, and to prevent the return of funds to the federal government.

### ***Risk Assessment, Program Integrity and Monitoring***

A risk assessment is a process to identify potential hazards and analyze what could happen if a hazard occurs. Risk assessment is a concurrent discussion among LIHEAP grantees and OCS. It is a process that each grantee must develop and include in their annual plan.

From FY 2012 through FY 2014, the LIHEAP Model Plan included A Program Integrity Supplement that required grantees, among others to assess risks in several fiscal and programmatic areas, such as Single Audit, State Auditor's review, vendor authentication, vendor payments, waste, fraud, and abuse, prevention policies, etc.

The Program Integrity Working Group (PIWG) formed in 2012 as a response to the GAO review. The workgroup's report, stated that proper fiscal management will help to *"ensure that all LIHEAP funds are properly spent and accounted for."*

The group considered the following to be critical components of sound fiscal management:

- **State fiscal controls:** Policies and procedures are in place to comply with federal regulations and guidelines.

- **Local agency fiscal controls:** Policies and procedures are in place to ensure compliance with state and federal law, policies and procedures, and relevant contract provisions.
- **Local agency training:** Training is in place to prevent or detect improper payments and administrative errors, as well as separation of duties to prohibit the same employee from both processing applications and authorizing benefits.
- **Vendor fiscal controls:** Vendor authenticity and eligibility are validated through licensing, certification, Tax ID numbers, and other means as determined by the state, and vendors' adherence to stipulations of vendor agreement and applicable law, policies and procedures is ensured.
- **Benefit payment and tracking:** Systems are in place to properly allocate, track and verify payments, detect and address duplicate and improper payments, and identify anomalies in the payment process. To the extent possible, system tracking should be proactive, i.e., problems are identified before a payment is made, rather than reactive, i.e., problems discovered during the program audit or after the payment has been made.

As a minimum requirement under fiscal management, the group recommended that states:

*Require a contract (or state regulations) with LAA (local administering agencies) that establishes: rights and responsibilities of local agencies and ensures that they follow generally accepted accounting principles and have appropriate financial audit*

As a best practice, the report said states should:

*Require a contract (or state regulations) with local agencies that establishes rights and responsibilities of local agencies and ensures that they follow generally accepted accounting principles and have an appropriate financial audit. Require local agency to develop a comprehensive local plan for fulfilling responsibilities that details internal training, evaluation, monitoring, and technical assistance as needed.*

Proper oversight and monitoring of LIHEAP funds is important in order to ensure compliance with federal and state LIHEAP policies, procedures and law. Monitoring can also be important in identifying additional controls and procedures that could strengthen a particular agency or the LIHEAP program overall.

States are responsible for monitoring the fiscal and program performance of their subcontractors (or subgrantees) and vendors. Please see the following 2 guidance references (**in bold**) below:

**The LIHEAP statute, Section 2605(b)(10), says they must:**

*"provide that such fiscal control and fund accounting procedures will be established as may be necessary to assure the proper disbursement of and accounting for Federal funds paid to the State under this title, including procedures for monitoring the assistance provided under this title, and provide that the State will comply with the provisions of chapter 75 of title 31, United States Code (commonly known as the 'Single Audit Act')"*

**The federal OMB Uniform Administrative Guidance [2 C.F.R. § 200.331 (e)] requires grantees to:**

e) Depending upon the pass-through entity's assessment of risk posed by the subrecipient (as described in paragraph (b) of this section), the following monitoring tools may be useful for the pass-through entity to ensure proper accountability and compliance with program requirements and achievement of performance goals: (1) Providing subrecipients with training and technical assistance on program-related matters; and (2) Performing on-site reviews of the subrecipient's program operations; (3) Arranging for agreed-upon-procedures engagements as described in § 200.425 Audit services.

**The federal OMB Uniform Administrative Guidance [2 C.F.R. § 200.331 (d)] requires grantees to:**

*(d) Monitor the activities of the subrecipient as necessary to ensure that the subaward is used for authorized purposes, in compliance with Federal statutes, regulations, and the terms and conditions of the subaward; and that subaward performance goals are achieved. Pass-through entity monitoring of the subrecipient must include:*

*(1) Reviewing financial and programmatic reports required by the pass through entity.*

*(2) Following-up and ensuring that the subrecipient takes timely and appropriate action on all deficiencies pertaining to the Federal award provided to the subrecipient from the pass-through entity detected through audits, on-site reviews, and other means.*

Additionally, states must ensure their own compliance with federal and state policies because these are subject to periodic monitoring by federal staff, as outlined in the LIHEAP statute Section 2608(b)(1):

*"The Secretary shall conduct in several States in each fiscal year investigations of the use of funds received by the States under this title in order to evaluate compliance with the provisions of this title."*

Monitoring procedures vary widely among the states. States may conduct annual on-site reviews of every local administrative agency, or they may schedule these for

every 2-3 years, depending on their budget and the number of local agencies. Some states do a risk assessment and review agencies determined to be at risk more often. In lieu of on-site reviews, states may conduct periodic desk reviews where they check agency data in a centralized database, if applicable, or check agency invoices, monthly reports, and other paperwork for inaccuracies and anomalies. In absence of subgrantees, tribal monitoring may involve internal review of client files, vendor invoices, delivery receipts, payments, regular meeting with fiscal staff, review of LIHEAP weatherization offices, weatherized homes, etc.

### ***Performance Management, Reporting and Evaluation***

Performance management and evaluation is an important lifecycle that promotes accountability for all the hard work that each LIHEAP grantee does every day. Results of the program can be measured and used as a tool for planning. This cycle is the starting and the ending points of every program.

In response to the Office of Inspector General (OIG) findings, the DEA established a LIHEAP Performance Measures Work Group (PMWG) in 2010 and later the LIHEAP Performance Measures Implementation Work Group (PMIWG) to help state grantees develop and implement methods for collecting and tracking data associated with meeting LIHEAP's new performance measures. The Workgroup developed a written report with a set of recommendations to OCS.

The PMIWG helped create the OCS Performance Management website to provide LIHEAP grantees a tool that turns data into information that can be used to improve the management of their programs each year and inform budget and programmatic decisions. The website was also designed to have information that would be useful for other stakeholders outside of LIHEAP grantees, including Congressional members and staff; state and local legislators; utilities and utility regulators; consumer advocates and sub-grantees; and academic researchers, the media, and the general public.

## **Required Reports**

On August 1<sup>st</sup> of each year, all grantees prior to submitting their LIHEAP Plan to OCS are required to submit the Carryover and Reallotment Report summarizing fiscal data from the prior federal fiscal year.

On September 1<sup>st</sup> of each year, all state grantees, the District of Columbia and Puerto Rico along with their LIHEAP Plan are required to submit their initial Household Report (Long Form). Tribal and other territorial grantees are required to submit a Household Report (Short Form) by September 1<sup>st</sup> as well. Grantees must submit a final Household Report to OCS by December 15th of each year.

**An otherwise completed LIHEAP Model Plan cannot be accepted by OCS unless the above two required report are submitted.**

**By December, all grantees are required to submit their Federal Financial Report (SF-425) to HHS via OLDC.**

**Once announced, state grantees must also submit their LIHEAP Performance Measures Data Form (which also includes Grantee Survey fiscal data) to OCS.**

**Note: Audit Reports (including subgrantee Audit) and FFATA reports are also required of certain grantees.**

Collecting data provides a means to manage programs effectively and efficiently in order to fulfil the LIHEAP statute's requirement that the highest level of assistance should go to households with the lowest incomes and highest energy burdens.

### **Program Contact:**

Low Income Home Energy Assistance Program  
Division of Energy Assistance  
Office of Community Services  
Phone: (202) 401-9351

## References:

1. LIHEAP fact Sheet:  
[https://www.acf.hhs.gov/sites/default/files/ocs/liheap\\_fact\\_sheet\\_031717.pdf](https://www.acf.hhs.gov/sites/default/files/ocs/liheap_fact_sheet_031717.pdf)
2. Legislative Authority - <https://www.congress.gov/bill/97th-congress/house-bill>
3. Model Plan Action Transmittal:  
<https://www.acf.hhs.gov/ocs/resource/liheap-at-2018-01-model-plan-application-for-fy2018-funding>
4. Crisis Funds - Section 2605(a)(4)(c) -  
<https://liheapch.acf.hhs.gov/pubs/liheapstatute.htm>
5. LIHEAP Q & A on Disaster Relief - [www.acf.hhs.gov/ocs/resource/liheap-disaster-relief - 43k - 2018-03-20](http://www.acf.hhs.gov/ocs/resource/liheap-disaster-relief-43k-2018-03-20)
6. LIHEAP Resource Guide - <https://liheapch.acf.hhs.gov/Tribes/manual.htm>
7. LIHEAP Plan - Section 2604 (a)(1)(A) -  
<https://liheapch.acf.hhs.gov/pubs/liheapstatute.htm>
8. Assurance 12 - <https://liheapch.acf.hhs.gov/pubs/liheapstatute.htm>
9. OMB Circular A-123, Appendix C Part I.A.9.b -  
[https://obamawhitehouse.archives.gov/.../a123/a123\\_appx-c.pdf](https://obamawhitehouse.archives.gov/.../a123/a123_appx-c.pdf)
10. Program Integrity Report - <https://liheapch.acf.hhs.gov/admin/integrity-report.htm>
11. Monitoring Process - <https://liheapch.acf.hhs.gov/admin/oversight.htm>
12. Performance Management - <https://liheapch.acf.hhs.gov/admin/oversight.htm>
13. LIHEAP Staff Contacts - [www.acf.hhs.gov/ocs/programs/liheap](http://www.acf.hhs.gov/ocs/programs/liheap)