

# GRANTEE ROLES AND RESPONSIBILITIES

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ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

NEADA

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# LIHEAP GRANTEE RESPONSIBILITIES

At the most basic level LIHEAP grantees cannot delegate:

- Drawing Down Funds
- Reporting to ACF (household report, etc.)
- Signing the Assurances
- Submitting the Model Plan

# LIHEAP GRANTEE RESPONSIBILITIES

- Many activities can be delegated, provided the delegation of these activities do not create inequities in how clients are treated.
- Delegation of activities does not absolve the grantee of responsibility to develop the processes for defining, implementing, administering and monitoring the activities.

# LIHEAP GRANTEE RESPONSIBILITIES

Grantees should not delegate the following:

- Monitoring of sub-grantees
- Development of statewide policies and procedures for LIHEAP administration
- Model plan development
- Tracking of funds to ensure timely obligation
- Processing refunds from utility vendors

# MONITORING SUB-GRANTEES

- Grantees that delegate some of their operations to a CAA association should still maintain monitoring at the state level.
- Grantees may hire outside entities to perform monitoring, but those entities should not oversee or be related to the sub-grantees they are monitoring.

# DEVELOPING POLICIES AND PROCEDURES

- Grantees must set standards for how the program will be run to ensure consistency of service across the state/tribe service area.
- These include:
  - Eligibility guidelines
  - Income definitions
  - Benefits levels
  - Other policies that could affect equitable distribution of services
- Within reason, grantees can give sub-grantees flexibility in implementing policies depending on the needs of their communities.

# MODEL PLAN DEVELOPMENT

- Grantees should develop the model plan, in consultation with sub-grantees and other interested parties where appropriate.
- It is not appropriate to have a CAA association or other entity develop the grantee's model plan and send it to the grantee for signature.

# TRACKING OF FUNDS

- Grantees must track obligation of funds and their sub-grantees' billing against obligated/contracted funds to ensure all funds are obligated timely and that contracted funds are fully expended within the contract period.
- Grantees must track LIHEAP administrative expenses at both the grantee and sub-grantee level, even if those expenses are paid for by other funding sources in order to ensure compliance with the 10% administrative cost cap.

# TRACKING FUNDS (CONT.)

- If total LIHEAP administrative expenses exceed 10% of the LIHEAP grant, any excess CANNOT be paid for with other federal funds.
- It is not enough to only track the LIHEAP funds budgeted for administrative costs for the grantee and sub-grantees.
- Grantees must ensure that if it costs their sub-grantees more to administer LIHEAP than their LIHEAP budget allows, that they are not using other federal funds to make up the difference.

# PROCESSING REFUNDS FROM UTILITY VENDORS

- Grantees must track refunds received from utility vendors, even if those payments were made initially by sub-grantees.
- Refunds or abandoned deposits are considered de-obligated funds. The grantee must determine whether they may be re-obligated or must be returned to HHS, based on the grantee's carryover limit and the federal fiscal year the benefits were first applied to the client's account.

# MORE ON VENDOR REFUNDS

- A LIHEAP benefit retains its federal characteristics forever. The funds are always considered federal funds.
- When sending back refunds, vendors must be required to identify the client to whom the refund belongs and when they first received the payment.
- The grantee must then determine which federal fiscal year funded that specific payment.

# EVEN MORE ON VENDOR REFUNDS

- If the original payment came from the current fiscal year, the funds can be re-obligated by the grantee for LIHEAP purposes.
- If the original payment came from the previous fiscal year, the funds may be re-obligated by the grantee only if the grantee has not already carried over the maximum 10% of funds from the prior year.
- If the carryover maximum has already been met or the original benefit was paid earlier than the prior federal fiscal year, the funds must be returned to HHS.

# THE FINAL WORD ON VENDOR REFUNDS

- All of the decisions just described CANNOT be made by sub-grantees on an individual basis. They must be the sole responsibility of the grantee.

# CONTACT INFORMATION

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