

LIHEAP Performance Measures Data Collection Guide

Supplement: Criteria for Determining “At-Risk” Households

To report when a LIHEAP benefit **prevented home energy loss**—grantees should be collecting information about Home Energy status at the time of client application. This includes whether or not:

- a. Household is at imminent risk of losing home heating or cooling because they have a past-due or shutoff notice from natural gas or electric company
- b. Household is at imminent risk of losing home heating because they are nearly out of fuel oil/kerosene, propane, or other delivered fuel
- c. Household is at imminent risk of losing home heating or cooling because their heating or cooling equipment is operating, but is at imminent risk of becoming inoperable or unusable.

DEFINING “AT IMMINENT RISK”

“Imminent risk” should be defined by the grantee based on local conditions, and should correspond with existing state definitions used to determine home energy emergencies (as outlined in the grantee’s Model Plan and/or policy manuals).

Electric and Natural Gas

Most grantees find that for electric and natural gas customers, defining “imminent risk” is fairly straightforward. This can include households with past due accounts, shutoff, or disconnect notices.

Fuel Oil/Kerosene, Propane, or Other Delivered Fuels

For deliverable fuel customers, grantees use a wide variation of criteria to determine whether a household is at imminent risk of losing home energy.

Some grantees simply ask applicants to self-declare on the application (or during the intake) whether or not they are “nearly out of fuel.” However, many grantees use more specific criteria to identify whether a household is at imminent risk of losing home energy. For example:

- **Maine:** Less than 3-day supply of fuel (e.g. reading of 1/8 tank or less on a standard 275 gallon heating oil tank; reading of 25% or less on a propane tank). “3-day or less” supply standard applies to other delivered fuel types.
- **Michigan:** A residential fuel tank must not contain more than 25% of its heating fuel capacity.
- **Wyoming:** When LIHEAP is used to assist households with 100 gallons or less of oil and propane, the benefit is considered a prevention of home energy loss. Tonnage and cord measurements are used for wood, coal, etc.
- **Wisconsin:** “Low on fuel” is considered equal to or less than 20% of fuel remaining.

Heating and Cooling Equipment

For some households, heating or cooling equipment may still be operable, but deemed at imminent risk of becoming inoperable or unusable. In these cases, LIHEAP funds used for equipment repair or replacement are **preventing home energy loss**.

Grantees have discretion to define when equipment poses an “imminent risk” of home energy loss. For example, some grantees base their imminent risk definitions on specific health and safety criteria already used by weatherization contractors/programs within their state.

Other grantees set time frames that may be helpful in determining imminent risk. For example, in Wyoming, LIHEAP weatherization crews are asked to identify equipment that “in all likelihood will fail in the next 12-18 months.” Other factors may include:

- Model, year and make of equipment
- Whether equipment is listed on the obsolete furnace/equipment list
- How the equipment tests in terms of performance
- Whether equipment is legally banned or about to be legally banned (e.g., wood stove restrictions)

The following **should not** be counted as prevention of “imminent” home energy loss:

- Operable equipment that is repaired or replaced strictly for energy efficiency gains.
- Annual equipment tune-ups or filter changes.

Many grantees repair or replace home heating and cooling equipment using LIHEAP funding. This work may be done through LIHEAP weatherization, emergency equipment programs, or a combination of both. The criteria for determining whether equipment repair or replacement is necessary to prevent imminent risk of home energy loss *should be consistent across all LIHEAP program components*. This will likely require coordination, collaboration, and training among subgrantee crews and contractors.

VALIDATING DATA

For grantees to report that a LIHEAP benefit prevented home energy loss, ***they must have some assurance that the benefit was actually successful in preventing loss of home heating or cooling service.*** Most states have one or more of the following policies in place to confirm prevention:

- **A copy of the most current bill is required to authorize benefit.** This can confirm whether a household has a “past due” or “shutoff” notice, and indicates the amount necessary for prevention of disconnect.
- **Interfacing with the vendor or utility is required to authorize benefit or payment.** For example, to confirm current account status, fuel levels, and/or amount due—many grantees will call the vendor, utilize a vendor data portal, or obtain up-to-date information from a vendor data exchange.
- **Data Exchanges are conducted with fuel vendors after delivery.** Some grantees use their data exchanges to confirm fuel status at time of delivery. This helps the grantee accurately identify whether or not a fuel benefit restored home energy or prevented home energy loss.

- **Home Audits** are required to confirm that repair/replacement of heating or cooling equipment is necessary to address “imminent risk” of home energy loss. **Final inspections** are conducted to confirm that equipment repair/replacement actually occurred and was necessary to address “imminent risk” of home energy loss.

SPECIAL CONSIDERATIONS

In some cases, collecting account status at the time of application may not be sufficient to report that the LIHEAP benefit successfully prevented home energy loss.

Example 1: Length of Time between Client Application and Benefit Authorization

There are some cases where a considerable amount of time may lapse between the time of LIHEAP application and benefit authorization. This means that the account status reported by the household at the time of application (e.g., past due, shutoff notice, nearly out of fuel) may no longer be accurate. Under these circumstances, grantees may consider the following options:

- Confirm (update) account status with household prior to benefit authorization. This could include submission of updated utility or vendor bill.
- Contact vendor to confirm account status prior to authorizing benefit. This may be done through a call with the vendor, a vendor data portal, or automated vendor data exchange.
- Contact vendor after fuel delivery to confirm status at time of delivery (nearly out of fuel or out of fuel). This may be done through a call with the vendor, a vendor data portal, or automated vendor data exchange.

If account status information is outdated and cannot be confirmed—the household should not be counted in Part VII of the Performance Data Form. For some states this may result in only reporting “crisis program” households (where in most cases, home energy status is verified prior to benefit or after fuel delivery).

Example 2: Benefits that Don’t Result in Restoration.

In rare cases, LIHEAP benefits may not be sufficient to prevent home energy loss (even if the household has a disconnect notice or is nearly out of fuel at the time of application or intake). In these cases, grantees may consider the following options:

- Many states supplement LIHEAP with other resources to prevent home energy loss. If LIHEAP is used in conjunction with other funding to prevent home energy loss, it should still be counted on the Performance Data Form as a prevention.
- Some grantees may authorize benefits that are not sufficient to prevent loss of home energy (e.g., less than the amount due), but only do so after verifying the household has a “feasible plan” to maintain home energy. This may include proof of other pledged assistance or negotiated payment plans with the vendor. The grantee should only report that LIHEAP prevented loss of home energy in cases where they are confident loss was actually prevented.

Some states authorize benefits that are not sufficient to prevent home energy loss. In these cases, even if the household is past due, has a shutoff notice, or is nearly out of fuel at the time of application, the household should not be counted as a prevention on the Performance Data Form.

Example 3: Household Reported Equipment Status

Although many grantees ask households the status of their home energy equipment on the LIHEAP application, this data is generally not reliable enough to use for reporting cases where LIHEAP equipment repair or replacement prevented home energy loss. For example:

- Inoperable or unreliable equipment may be found during a home energy audit, even though the household reported their equipment as functional at the time of LIHEAP application.
- Households may report inoperable or unreliable equipment on their LIHEAP application, however, an audit identifies user error (or other minor issues).
- Some verification is needed that the equipment repair or replacement actually occurred, and was necessary to address “imminent risk” of home energy loss. This usually involves a home audit and/or a final inspection report.

Supplemental Resources	
Performance Measures Data Collection Guide	Vendor Agreement Supplement
Criteria for Determining Service Restoration	Subgrantee Data Exchange Templates
Vendor Data Exchange Templates	Vendor Selection Supplement
Client Waiver Supplement	LIHEAP Performance Management Website