

Program: Low Income Home Energy Assistance Program

Oversight Authority: Indiana Housing and Community Development Authority

Public Comment Period: 8/1/14-8/11/14

Public Hearing: 8/12/14

Submission of Public Comments: To submit public comments, please email Taura Edwards, Director of Community Programs, at taedwards@ihcda.in.gov. The subject line should be "State Plan Comments".

Summary of the Process: The state of Indiana submits a plan of program administration to the U.S. Department Health and Human Services as application for block grant funding to the Low Income Home Energy Assistance Program. The annual state plan process has been revised pursuant to OMB clearance in 2014. The state plan is no longer a narrative form, but an electronic form with dropdown options. The version below is a summary of the information that will be detailed in the electronic system.

Section 1

Program Components, 2605(a), 2605(b)(1) – Assurance 1, 2605(c)(1)(C)

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

<input checked="" type="checkbox"/>	Heating assistance	Start date: 10/1/14	End date: 5/31/15
<input checked="" type="checkbox"/>	Cooling assistance	Start date: 6/1/15	End date: 8/31/15
<input checked="" type="checkbox"/>	Crisis assistance	Start date: 10/1/14	End date: 9/30/15
<input checked="" type="checkbox"/>	Weatherization assistance	Start date: 10/1/14	End date: 9/30/15

Comment [t1]: Indiana will set the crisis period for the entire program year so that the state plan doesn't have to be amended if the state decides to run a crisis program during the summer months.

Estimated Funding Allocation, 2604(c), 2605(k)(1), 2605(b)(9), 2605(b)(16) – Assurances 9 and 16

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%.**

45 % heating assistance

10 % cooling assistance

10 % crisis assistance

15 % weatherization assistance

5 % carryover to the following Federal fiscal year

10 % administrative and planning costs

5 % services to reduce home energy needs including needs assessment (Assurance 16)

0 % used to develop and implement leveraging activities

100 % **TOTAL**

Alternate Use of Crisis Assistance Funds, 2605(c)(1)(C)

1.3 The funds reserved for winter crisis assistance that have not been expended by March 15 will be reprogrammed to:

- Heating assistance
- Weatherization assistance
- Cooling assistance
- Other (specify): _____

NOTE: Indiana will submit a Good Cause Waiver to the US Department of Health and Human Services if the state has enough funds to cover a summer program, set aside at least five percent toward carryover and still have sufficient funding to provide additional benefits. A Good Cause Waiver allows the state to transfer up to an additional 10 percent to the Weatherization Assistance Program.

Categorical Eligibility, 2605(b)(2)(A) – Assurance 2, 2605(c)(1)(A), 2605(b)(8A) – Assurance 8

1.4 Do you consider households **categorically eligible** if one household member receives one of the following categories of benefits in the left column below? Yes No

Comment [HHS2]: Hyperlink: "Categorical eligibility is defined for the purpose of this question as the ability for a household to qualify for LIHEAP assistance without providing additional income documentation if at least one person in the household is enrolled in TANF, SNAP, SSI, or a means-tested veterans assistance program."

	Heating	Cooling	Crisis	Weatherization
SNAP				
TANF				
SSI				
Means-tested veteran's program				
Other (Specify): _____ _____				

1.5 Do you automatically enroll households without a direct annual application?
 Yes No -- If yes, explain:

1.6 How do you ensure there is no difference in the treatment of categorically eligible households from those not receiving other public assistance when determining eligibility and benefit amounts?

Indiana does not provide preferential treatment to categorically eligible households.

SNAP Nominal Payments

1.7 a. Do you allocate LIHEAP funds toward a nominal payment for SNAP clients?

Yes No

If you answered "Yes" to question 1.7s, you must provide a response to questions 1.7b, 1.7c, and 1.7d.

17.b Amount of Minimal Assistance: \$_____

17.c Frequency of Assistance:

- Once per year
 Once every five years
 Other (describe): _____

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

Determination of Eligibility – Countable Income

1. In determining a household's income eligibility for LIHEAP, do you use gross income or net income?

- Gross Income
 Net Income

2. Select all of the applicable forms of countable income used to determine a household's income eligibility for LIHEAP.

- Wages
 Self-employment income
 Contract income
 Payments from mortgage or sales contracts
 Unemployment Insurance
 Strike pay
 Social Security Administration (SSA) benefits
 Including MediCare deduction Excluding MediCare deduction
 Supplemental Security Income (SSI)
 Retirement / pension benefits
 General Assistance benefits
 Temporary Assistance for Needy Families (TANF) benefits
 Supplemental Nutrition Assistance Program (SNAP) benefits
 Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits
 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.
 Jury duty compensation
 Rental income
 Income from employment through Workforce Investment Act (WIA)
 Income from work study programs

- Alimony
- Child support
- Interest, dividends, or royalties
- Commissions
- Legal settlements
- Insurance payments made directly to the insured
- Insurance payments made specifically for the repayment of a bill, debt, or estimate

- Veterans Administration (VA) benefits
- Earned income of a child under the age of 18
- Balance of retirement, pension, or annuity accounts where funds cannot be withdrawn without a penalty.
- Income tax refunds
- Stipends from senior companion programs, such as VISTA
- Funds received by household for the care of a foster child
- Ameri-Corp Program payments for living allowances, earnings, and in-kind aid.
- Reimbursements (for mileage, gas, lodging, meals, etc.)
- Other

DRAFT

Section 2 - HEATING ASSISTANCE

Eligibility, 2605(b)(2) – Assurance 2

2.1 Designate The income eligibility threshold used for the heating component:

2014 HHS poverty income level 150%
OR
 FY 2015 state’s median income _____%

2.2 Do you have additional eligibility requirements for **HEATING ASSISTANCE**?
 Yes No

Note: Indiana residents must ensure that the customer of record on the utility is a household member listed on the eligibility application for assistance. Failure to meet this requirement will make the home ineligible for benefits.

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

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| • Do you require an <u>assets test</u> ? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| • Do you have additional/differing eligibility policies for: | | |
| • Renters? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| • Renters living in subsidized housing? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| • Renters with utilities included in the rent? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Comment [YR3]: An assets test is an income threshold that includes the value of property (such as a home, a car, an investment property) or the balance of bank accounts or retirement accounts.

Note: Indiana renters with subsidized housing are ineligible for crisis assistance.

- | | | |
|---|-------------------------------------|-------------------------------------|
| • Do you give priority in eligibility to: | | |
| • <u>Elderly</u> ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| • Disabled? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| • <u>Young children</u> ? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| • Households with high energy burdens? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| • Other? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

Comment [YR4]: “Elderly is defined as any person at least 60 years of age.”

Comment [YR5]: “Young child is defined as a child under the age of 6.”

Determination of Benefits, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

2.4 Describe how you prioritize the provision of heating assistance to vulnerable households, e.g., benefit amounts, application period, etc.

According to Section 800 of the Program Operations Manual, local service providers are allowed to send all at-risk households a “mail application”. The mail application process allows these vulnerable populations to submit their eligibility information via mail and be processed

without coming to a local office for assistance. Mail applications are sent to at-risk (vulnerable) households as least 60 days prior to the start of the heating assistance period, usually beginning the first Monday in September. Assistance is based on the paperwork provided upon receipt of a completed application. Transmittals, or payment notifications, are sent to the utility vendors on the November 1, or thereafter. If a mail applicant needs crisis assistance prior to processing the mail application, then the applicant will contact the local agency for a crisis appointment.

Also, the 2015 Benefit Matrix will allocate 3 points to any household that has an at-risk household member. Indiana defines "at-risk" as elderly (age 60 and over), disabled, and children (age 5 and under).

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

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

Benefit Levels, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

2.6 Describe benefit levels:

\$ 160 Minimum benefit \$ 395 Maximum benefit

2.7 Do you provide in-kind (e.g., blankets, space heaters) and/or other forms of benefits?

Yes No -- If yes, describe.

Section 3: COOLING ASSISTANCE

Eligibility, 2605(c)(1)(A), 2605(b)(2) – Assurance 2

3.1 Designate the income eligibility threshold used for the cooling component:

2014 HHS poverty income level 150 %

OR

FY 2015 median income _____ %

3.2 Do you have additional eligibility requirements for **COOLING ASSISTANCE**

Yes No

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

- | | <u>Yes</u> | <u>No</u> |
|--|-------------------------------------|-------------------------------------|
| ● Do you require an asset test? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ● Do you have additional/differing eligibility policies for: | | |
| ● Renters? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ● Renters living in subsidized housing? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Renters with utilities included in the rent? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |

Note: Indiana renters with subsidized housing are ineligible for crisis assistance.

● Do you give priority in eligibility to:

- | | | |
|--|-------------------------------------|-------------------------------------|
| ● Elderly? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Disabled? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Young children? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Households with high energy burdens? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ● Other? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |

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

All winter recipients may be eligible to receive a summer cooling assistance benefit as long as the utility is not included in rent and the customer of record is at least one current household member. For vulnerable households, they may request a window air conditioning unit. The household must complete a medical affidavit and not have received a unit within the last five years.

Determination of Benefits, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

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

- Income
- Family (household) size
- Home energy cost or need
 - Fuel type
 - Climate/region
 - Individual bill
 - Dwelling type
 - Energy burden (% of income spent on home energy)
 - Energy need
 - Other (describe)

Benefit Levels, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

3.6 Describe benefit levels:

\$50_____ Minimum benefit \$75_____ Maximum benefit

3.7 Do you provide in-kind (e.g. fans, air conditioners) and/or other forms of benefits?

Yes No -- If yes, describe.

As previously mentioned, vulnerable households may receive an air conditioning unit if there is a documented medical need.

Section 4: CRISIS ASSISTANCE,

Eligibility - 2604(c), 2605(c)(1)(A)

4.1 Designate the income eligibility threshold used for the crisis component:

2014 HHS poverty income level 150 %
OR
FY 2015 state median income _____%

4.2 Provide your LIHEAP program's definition for determining a crisis.

Indiana defines a crisis as:

- Up for disconnection with a disconnect notice
- Disconnected (no active service)
- Nearly out of fuel (Indiana does not current define nearly out of fuel).
- Out of fuel (an empty tank and in need of a delivery)

Comment [YR6]: Hyperlink: "The LIHEAP statute requires that a grantee respond to a crisis within 48 hours of being notified of such crisis."

Crisis benefits are based on the documentation provided. If the regular benefits are insufficient to mitigate the crisis, then crisis funds are released to meet the crisis amount provided in the application.

4.3 What constitutes a life-threatening crisis?

Life-threatening crisis is defined as having no fuel or no working heat during inhabitable weather conditions.

Comment [YR7]: "The LIHEAP statute requires that a grantee respond to a life-threatening crisis within 18 hours of being notified of such crisis."

Crisis Requirements, 2604(c)

4.4 Within how many hours do you provide crisis assistance that will resolve the energy crisis for eligible households? 48 Hours

4.5 Within how many hours do you provide crisis assistance that will resolve the energy crisis for eligible households in life-threatening situations? 18 Hours

Crisis Eligibility, 2605(c)(1)(A)

4.6 Do you have additional eligibility requirements for **CRISIS ASSISTANCE?**

Yes No

4.7 Check the appropriate boxes below and describe the policies for each.

Yes No

• Do you require an asset test?

• Do you give priority in eligibility to:

- Elderly?
- Disabled?
- Young children?
- Households with high energy burdens?
- Other?

● In order to receive crisis assistance:

- Must the household have received a shut-off notice or have a near empty tank?
- Must the household have been shut off or have an empty tank?
- Must the household have exhausted their regular heating benefit?
- Must renters with heating costs included in their rent have received an eviction notice?
- Must heating/cooling be medically necessary?
- Must the household have non-working heating or cooling equipment?
- Other?

● Do you have additional/differing eligibility policies for:

- Renters?
- Renters living in subsidized housing?
- Renters with utilities included in the rent?

Determination of Benefits

4.8 How do you handle crisis situations?

- Separate component
- Fast Track
- Other

4.9 If you have a separate component, how do you determine crisis assistance benefits?

- Amount to resolve crisis, up to a maximum of \$ 400

Other

Crisis Requirements, 2604(c)

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?

Yes No

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

■ Submit applications for crisis benefits without leaving their homes?
 Yes No If yes, explain.

■ Travel to the sites at which applications for crisis assistance are accepted?
 Yes No If yes, explain.

Benefit Levels, 2605(c)(1)(B)

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

Winter Crisis \$400 _____ maximum benefit

Summer Crisis \$0 _____ maximum benefit

Year-round Crisis \$0 _____ maximum benefit

Comment [t8]: Indiana allows \$200 for regulated crisis assistance and \$400 for delivered fuels crisis assistance.

4.13 Do you provide in-kind (e.g. blankets, space heaters, fans) and/or other forms of benefits?

Yes No If yes, describe.

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

Yes No

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

	Winter Crisis	Summer Crisis	Year-round Crisis
Heating system repair			
Heating system replacement			

Cooling system repair			
Cooling system replacement			
Wood stove purchase			
Pellet stove purchase			
Solar panel(s)			
Windmill(s)			
Utility poles / Gas line hook-ups			
Other (Specify): _____			

4.17 Do any of the utility vendors you work with enforce a winter moratorium on shut offs?
 Yes No _____

4.18 Describe the terms of the moratorium and any special dispensation received by LIHEAP clients during or after the moratorium period.

According to Section 100 of the Program Operations Manual, below is a summary of moratorium protection, as defined by Indiana code.

108 MORATORIUM

108.1 Indiana Code on Utility Shutoff Moratorium

The Indiana General Assembly has enacted Indiana Code 8-1-2-121 governing the termination of natural gas and electric service without the customer's request. This law, which first became effective in 1983, states that a utility (municipally-owned, privately-owned or cooperatively-owned) may not, during the period from December 1 through March 15 of any year, terminate residential utility service to any customer who is eligible for and who has applied for the Energy Assistance Program.

Utilities may not disconnect service to EAP recipients if:

- the customer has submitted a complete application and eligibility has been determined by the local LSP or their subcontractor; and/or,
- the customer has furnished proof to the utility provider of his/her application to receive such benefits, or the local LSP has notified the utility in writing.

See the complete Utility Shutoff Moratorium in the Appendix 0.

Who is a covered utility?: A covered utility is an electric or gas utility, including a municipally owned, privately owned, or cooperatively owned utility, then the company qualifies as a

“utility” for the purposes of the moratorium law. The definition of “municipally owned utility” means every utility owned or operated by any city or town in Indiana.

Who is a customer?: Any person who has agreed to pay for electric or gas services exclusively for residential purposes is a customer. Receipt of an EAP benefit does not affect someone’s status as a customer.

108.2 Moratorium Qualifications

Any household who has qualified for EAP on or after October 1 cannot have its service disconnected between December 1 and March 15. A “qualified” household is defined as a household that has submitted a complete application to its local LSP or designee, and a staff person at the agency has determined or is determining that eligibility meets the program requirements based on household income, number of household members, and utility bills. (See Section 701 for all of the components of a complete application.)

Simply submitting an application does not automatically make a household eligible. If the local LSP does not have sufficient resources to conduct an eligibility review, then the household is not protected.

108.3 Eligibility without Benefits

Once the household has submitted an application and has been deemed or is being deemed eligible for the EAP benefit, the client is protected under the moratorium, whether a benefit has been received or not. Clients deemed eligible for EAP, but do not have a benefit due to insufficient program funds, will be placed in a HOLD status. All clients deemed eligible, but in a HOLD status, will be placed on a report. That report will be submitted to the utility vendors to ensure moratorium protection. (See Section 1400 on Reporting). Once funding is available, clients on the Hold Status Report will be approved, and the vendors will be contacted about EAP benefits.

108.4 Disconnection Prior to December 1

If a utility has negotiated a payment arrangement with a client who has qualified for EAP and that client violates that payment arrangement before Dec. 1, the utility has the right to disconnect that client prior to December 1, as that client is not yet protected by the moratorium. If the same client has active service as of December 1, the utility may not disconnect that client until March 16.

108.5 Benefit Refusal

A utility vendor may refuse an EAP benefit at any time during the heating season. Benefit refusal does not prevent moratorium protection. A client who has submitted a complete

application and is being deemed or has been deemed EAP eligible and has active service on December 1 will receive moratorium protection through March 15.

108.6 Landlord/Tenant Agreements and Moratorium Protection

Based on the utility policy change, utilities are required to be in the name of a household member, age 18 or over, unless the lease agreement requires the utilities to be listed in the landlord's name. Circumstance may arise where landlords and tenants must create a utility payment arrangement to ensure that the utility bills are paid on time. This policy provides clarification on moratorium protection when the payment arrangement between the landlord and client is breached.

If the utility is listed in the landlord's name, but the client has breached payment agreement with the landlord, the landlord may request service disconnection during the moratorium period. Though the client was deemed eligible for EAP assistance, the landlord is the customer of record on the utility bill.

If the utility is listed in the client's name, but the landlord has breached the payment agreement, then the client is protected under the moratorium because the client is the customer of record on the utility bill.

108.7 Disconnection during Moratorium

Regulations allow utilities to disconnect service for a customer otherwise covered under the moratorium in the following circumstances:

- If a condition dangerous or hazardous to life, physical safety, or property exists.
- Upon order by any court, the IURC, or other duly authorized public authority.
- If fraudulent or unauthorized use of electricity or gas is detected, and the utility has reasonable grounds to believe the affected customer is responsible for such use.
- If the utility's regulating or measuring equipment has been tampered with and the utility has reasonable grounds to believe that the affected customer is responsible for such tampering.

Section 5: WEATHERIZATION ASSISTANCE

Eligibility, 2605(c)(1)(A), 2605(b)(2) – Assurance 2

5.1 Designate the income eligibility threshold used for the weatherization component:

2014 HHS poverty income level 150 %

OR

FY 2015 state median income _____ %

5.2 Do you enter into an interagency agreement to have another government agency administer a **WEATHERIZATION component**? Yes No

5.3 Name the agency. _____

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

WEATHERIZATION - Types of Rules

5.5 Under what rules do you administer LIHEAP weatherization? (Check only one.)

Entirely under LIHEAP (not DOE) rules

Entirely under DOE WAP (not LIHEAP) rules

Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ: (Check all that apply.)

Income Threshold

Weatherization of entire multi-family housing structure is permitted if at least 66% of units (50% in 2- & 4-unit buildings) are eligible units or will become eligible within 180 days.

Weatherization of shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities) is permitted.

Other (describe)

Mostly under DOE WAP rules, with the following LIHEAP rule(s) where LIHEAP and WAP rules differ: (Check all that apply.)

Income Threshold

Weatherization not subject to DOE WAP maximum statewide average cost per dwelling unit.

Weatherization measures are not subject to DOE Savings to Investment Ratio (SIR) standards.

Other (describe)

Indiana will define where its health and safety rules differ from DOE guidelines as it pertains to the LIHEAP block grant funding and mitigate issues related to the "healthy homes".

Eligibility, 2605(b)(5) – Assurance 5

	<u>Yes</u>	<u>No</u>
5.6 Do you require an assets test?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.7 Do you have additional/differing eligibility policies for:		
• Renters?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Renters living in subsidized housing?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.8 Do you give priority in eligibility to:		
• Elderly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Disabled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Young children?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Households with high energy burdens?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Other?	<input type="checkbox"/>	<input type="checkbox"/>

Benefit Levels

5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household?

Yes No

s

5.10 What is the maximum amount? Effective October 1, 2014, the average cost per home (base) is \$6,000 and average cost per mechanical (or health and safety) is \$3,000. If a home requires a base and a mechanical expenditure, then it is called a capital intensive completion, and the average cost cannot exceed an average of \$9,000.

Types of Assistance, 2605(c)(1), (B) & (D)

5.11 What LIHEAP weatherization measures do you provide? (Check all categories that apply.)

<input checked="" type="checkbox"/> Weatherization needs assessments/audits	<input checked="" type="checkbox"/> Heating system replacement
<input checked="" type="checkbox"/> Caulking and insulation	<input checked="" type="checkbox"/> Cooling system repairs
<input type="checkbox"/> Install storm windows	<input checked="" type="checkbox"/> Cooling system replacement
<input checked="" type="checkbox"/> heating system repairs	<input checked="" type="checkbox"/> Energy related roof repair

Comment [t9]: Indiana allows minor roof repair under this component, not roof replacement.

Comment [MV10]: Grantees must keep adequate documentation of which recipients' received such services and written justifications for those repairs.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Major appliance repairs | <input checked="" type="checkbox"/> Install water heater |
| <input checked="" type="checkbox"/> Major appliance replacement | <input checked="" type="checkbox"/> Water conservation measures |
| <input type="checkbox"/> Install windows/sliding glass doors | <input checked="" type="checkbox"/> Compact florescent light bulbs |
| <input type="checkbox"/> Install doors (interior/exterior) | <input type="checkbox"/> Other (describe) |

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

6.1 Select all outreach activities that you conduct that are designed to assure that eligible households are made aware of all LIHEAP assistance available:

- Place posters/flyers in local and county social service offices, offices of aging, Social Security offices, VA, etc.

- Publish articles in local newspapers or broadcast media announcements.

- Include inserts in energy vendor billings to inform individuals of the availability of all types of LIHEAP assistance.

- Mass mailing(s) to prior-year LIHEAP recipients.

- Inform low income applicants of the availability of all types of LIHEAP assistance at application intake for other low-income programs.

- Execute interagency agreements with other low-income program offices to perform outreach to target groups.

- Other (specify):

Section 7: Coordination, 2605(b)(4) – Assurance 4

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.)

- Joint application for multiple programs
- Intake referrals to/from other programs
- One-stop intake centers
- Other – describe:

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

8.1 How would you categorize the primary responsibility of your State agency?

- Administration Agency
- Commerce Agency
- Community Services Agency
- Energy/Environment Agency
- Housing Agency
- Welfare Agency
- Other – describe: **Housing and Community Development**

Alternate Outreach and Intake, 2605(b)(15) – Assurance 15

8.2 How do you provide alternate outreach and intake for **HEATING ASSISTANCE?**
MAIL-IN PROTOCOL

According to Assurance 3, states are required to conduct outreach activities that will assure that eligible households, especially households with elderly individuals or disabled individuals, or both, are made aware of available assistance. All agencies serve these households through a mail-in process, which allows the eligibility determination to be accomplished without a face-to-face interview.

Some agencies have included families with children under age six (6), the other “at-risk” group in EAP. We encourage agencies to continue to expand their mail-in groups, particularly experimenting with the working poor to whom coming to the office may mean taking time from a job and losing pay.

8.3 How do you provide alternate outreach and intake for **COOLING ASSISTANCE?**

In addition to a public notice to the community, each local service provider provides a credit, when possible, to the cooling account for all clients served during for winter assistance.

8.4 How do you provide alternate outreach and intake for **CRISIS ASSISTANCE?**

Information on crisis assistance is available as part of the mail-in process, public notice of available funding sent to community and during in-person intake appointments.

	<u>Heating</u>	<u>Cooling</u>	<u>Crisis</u>	<u>Weatherization</u>
Who determines client eligibility?	<u>x</u>	<u>x</u>	<u>x</u>	<u>x</u>
Who processes benefit payments to gas and electric vendors?	x	x	x	
Who processes benefit payments to bulk fuel vendors?	x		x	
Who performs installation of weatherization measures?				x

8.5 What is your process for selecting local administering agencies?

Effective FY2013, local service providers submit an annual service delivery plan prior to receiving funding. Indiana utilizes the community action network in 91 of 92 counties and a community based organization for one county.

8.6 How many local administering agencies do you use? 24

8.7 Have you changed any local administering agencies from last year?

Yes No

8.8 Why?

- Agency was in noncompliance with grantee requirements for LIHEAP
- Agency is under criminal investigation
- Added agency
- Agency closed
- Other – describe

In Marion County, Indiana, there were two local service providers for FY 2012-2014. In FY2014, Indiana released a request for proposals (RFP) to identify one service provider that would maximize community collaboration and strategically coordinate resources within the county. The Marion County Consortium was chosen as the primary service provider for Marion County. The Consortium is a collaboration between the John H Boner Center, Connect 2 Help, and the United Way of Central Indiana. The United Way of Central Indiana will serve as the fiscal agent for the group. The Consortium has identified over 80 partners, will implement new technological resources for service delivery, and provide a more streamlined approach to customer service. By implementing these measures, the Consortium will increase service capacity in Marion County.

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

9.1 Do you make payments directly to home energy suppliers?

Heating Yes No

Cooling Yes No

Crisis Yes No

Are there exceptions? Yes No

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

Each applicant, whether approved or denied, receives a benefit notification letter with the date of approval, amount of assistance, and a list of vendors that were paid.

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?

Policies and procedures regarding the distribution of LIHEAP benefits and billing are outlined in the annual vendor agreement. The vendor agreement must be signed and remitted to IHCD prior to the distribution of benefits.

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?

This information is outlined in the annual vendor agreement that must be signed and remitted to IHCD prior to the distribution of benefits.

9.5 Do you make payments contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households? Yes No. If so, how?

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

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

As a part of the monitoring visit, the monitoring consultants test transmittal process. The test includes tracking applications to approval, the submission of transmittals to vendors, the approved transmittals back to the agency, and then the transmittal being submitted to IHCD for approval. The transmittal process has metrics, such as approved transmittals must be sent to IHCD for payment within five days of receipt from the utility vendor. IHCD also reviews A-133 audits for all local service providers and provides follow up to ensure that all LIHEAP related findings have been resolved and closed.

Audit Process

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

Yes

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 federal fiscal year.

Finding	Type	Brief Summary	Resolved?	Action Taken
1				
2				
3				
4				
5				

10.4. Audits of Local Administering Agencies

o What types of annual audit requirements do you have in place for local administering agencies/district offices?

Local agencies/district offices are required to have an annual audit in compliance with the Single Audit Act and OMB Circular A-133.

Local agencies/district offices are required to have an annual audit (other than A-133).

Local agencies/district offices' A-133 or other independent audits are reviewed by Grantee as part of compliance process.

Grantee conducts fiscal and program monitoring of local agencies/district offices.

Compliance Monitoring

10.5. Describe the Grantee's strategies for monitoring compliance with the Grantee's and Federal LIHEAP policies and procedures by:

Grantee employees:

- Internal program review
- Departmental oversight
- Secondary review of invoices and payments
- Other program review mechanisms are in place. Describe:

Local Administering Agencies/District Offices:

- On-site evaluation
- Annual program review
- Monitoring through Central Database
- Desk reviews
- Client File Testing/Sampling
- Other program review mechanisms are in place. Describe:

10.6. Explain, or attach a copy of, your local agency monitoring schedule and protocol.

705.1 MONITORING PROCESS

IHCDA will pull at least three (3) percent of the agency's client eligibility files and submit the files to the contracted file monitors for the review.

Notification of the visit will be sent at least 30 days prior to the visit. The LSP will receive the monitoring list of files according to the following schedule:

For agencies whose file total is greater than 500, they will be notified no more than 14 days prior to the view.

For agency's whose file total is less than 500, they will be notified no more than five (5) days prior to the review.

The monitors will conduct the review at the agency's primary (or main) location. Each review will include an entrance review, a client eligibility review, a financial review, a programmatic interview, and an exit interview. The client eligibility review analyzes the components of the application for completeness and accuracy as defined in Section 701. The financial review ensures that EAP applications are remitted via transmittals to utility vendors within 60 days from their approval date and that transmittals are submitted to IHCDA within five (5) days of receipt from the utility vendors. The programmatic interview allows the EAP program staff to explain their QA review process, energy education program, outreach activities for at-risk clients, and intake procedure for taking internal applications.

LSPs that scan and save files electronically may request an extended timeline for organizing files for the annual monitoring visit. LSPs are strongly encouraged to notify the State Office at the start of the program year, if they scan and save files electronically.

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

Site Visits: All 24 agencies receive an annual onsite visit. The visit is conducted by monitoring consultants who serve as agents of the test. The consultants conduct the file review, fiscal testing, and may conduct any subsequent visits pertaining to a corrective action plan if necessary.

Desk Reviews: All 24 agencies receive a subsequent desktop review to ensure that the consultants followed the proper protocols. A subset of the files are retested for accuracy. The state compliance officer follows up on any issues that may have been identified during the monitoring visit.

10.8. How often is each local agency monitored?

All local service providers are monitored at least one each program year.

10.9. What is the combined error rate for eligibility determinations?

Local service providers must an error rate of 14 percent or less to be considered compliant. Any error rate at 15 percent or above will trigger additional monitoring visits. If an agency has an error rate between 15-19 percent, then that agency must complete a modified quality improvement plan, which includes up to three site visits, training and technical assistance, and a file review contingent on the severity of the compliance issues. An error rate of 20 percent or more is a full quality improvement plan that includes three site visits, training and technical assistance, and a file review of up to 100 files.

10.10. What is the combined error rate for benefit determinations?

Local service providers must an error rate of 14 percent or less to be considered compliant. Any error rate at 15 percent or above will trigger additional monitoring visits.

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

For FY 2014, there were three local agencies who were required to complete a corrective action plan.

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

No service providers are on a corrective action plan for fiscal accounting or administrative issues.

	Local Sub-Grantee Agency	Counties	Number of Households Served	Estimated Number of files for Review	Dates of Review	
					Beginning	Ending
1	JHBCC	Indianapolis		0	Wednesday, February 25, 2015	Wednesday, March 11, 2015
2	CAGI	Indianapolis		0	Monday, March 16, 2015	Friday, March 27, 2015
3	SCCAP	Bloomington In		0	Wednesday, April 01, 2015	Friday, April 03, 2015
4	CANI	Ft Wayne		0	Monday, April 06, 2015	Friday, April 10, 2015
5	CAPE	Evansville		0	Monday, April 20, 2015	Wednesday, April 22, 2015
6	TRICAP	Jasper, In		0	Thursday, April 23, 2015	Thursday, April 23, 2015
7	LHDC	Tell City Indiana		0	Friday, April 24, 2015	Friday, April 24, 2015
8	CASI	Jeffersonville		0	Monday, April 27, 2015	Thursday, April 30, 2015
9	OVO	Madison In		0	Friday, May 01, 2015	Friday, May 01, 2015
10	COWI	Covington In		0	Monday, May 04, 2015	Tuesday, May 05, 2015
11	NWICA	Crown Pointe		0	Wednesday, May 13, 2015	Friday, May 22, 2015
12	SIEOC	Aurora, In		0	Friday, May 30, 2014	Friday, May 30, 2014
13	CAECI	Richmond, In		0	Thursday, June 04, 2015	Friday, June 05, 2015
14	CFS	Portland		0	Monday, June 15, 2015	Friday, June 19, 2015
15	AREA IV	Lafayette		0	Tuesday, June 23, 2015	Wednesday, June 24, 2015
16	WICAA	Terre Haute		0	Monday, June 29, 2015	Thursday, July 02, 2015
17	REAL	South Bend		0	Monday, July 06, 2015	Friday, July 10, 2015
18	CICAP	Anderson		0	Tuesday, July 14, 2015	Friday, July 17, 2015
19	AREA V	Logansport		0	Tuesday, July 21, 2015	Thursday, July 23, 2015
20	HUEDC	Mitchell, In		0	Monday, July 27, 2015	Wednesday, July 29, 2015
21	PACE	Vincennes		0	Thursday, July 30, 2015	Friday, July 31, 2015
22	HS	Columbus		0	Wednesday, August 26, 2015	Friday, August 28, 2015
23	NCCAA	Michigan City		0	Wednesday, September 09, 2015	Friday, September 11, 2015
24	ICAP	New Castle		0	Wednesday, September 23, 2015	Friday, September 25, 2015

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

11.1 How did you obtain input from the public in the development of your LIHEAP plan?

Check all that apply:

- Tribal Council meeting(s)
- Public Hearing(s)
- Draft Plan posted to website and available for comment
- Hard copy of plan is available for public view and comment
- Comments from applicants are recorded
- Request for comments on draft Plan is advertised
- Stakeholder consultation meeting(s)
- Comments are solicited during outreach activities
- Other, describe:

11.2 What changes did you make to your LIHEAP plan as a result of this participation?

Public Hearings, 2605(a)(2)

11.3 List the date(s) and location(s) that you held public hearing(s) on the proposed use and distribution of your LIHEAP funds?

Date	Event Description

11.4 How many parties commented on your plan at the hearing(s)?

11.5 Summarize the comments you received at the hearing(s).

11.6 What changes did you make to your LIHEAP plan as a result of the public hearing(s)?

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

12.1 How many fair hearings did the grantee have in the prior Federal fiscal year?

It is estimated that Indiana's state office received 30 denial appeals for FY2014.

12.2 How many of those fair hearings resulted in the initial decision being reversed?

It is estimated that Indiana's state office received 3 denial appeals for FY2014.

12.3 Describe any policy and/or procedural changes made in the last Federal fiscal year as a result of fair hearings?

Indiana amended its policy and guidance regarding the eligibility of home business owners. The updated policy requires either a separate meter or bill or review of tax information to ensure that annual income includes any energy deductions prior to calculating the client's annual income when determining eligibility.

12.4 Describe your fair hearing procedures for **households whose applications are denied.**

If an applicant is denied LIHEAP benefits, that applicant must first appeal to the Executive Director of the local agency that processed the application. If the agency denies the appeal and concludes that the applicant is still ineligible, then the applicant must then appeal to the Community Programs Manager at the state office. The Community Programs Manager will request a copy of the applicant and conduct an eligibility review. If the denial is upheld, then the state will contact the applicant with the results. If the appeal is struck down meaning the applicant may receive benefits, then the Community Programs Manager will contact the local agency to review the applicant and process benefits for the applicant. The applicant will receive a benefit notification letter within 10 days of approval.

If the applicant does not follow the appeals process and contacts the state office first, then the State Office reserves the right to process the appeal without sending the applicant back to the local agency for review.

12.5 When and how are applicants informed of these rights?

A summary of the appeals process is included on the denial letter that is sent to the applicant within 10 days of the benefit denial.

12.6 Describe your fair hearing procedures for **households whose applications are not acted on in a timely manner.**

N/A

12.7 When and how are applicants informed of these rights?

N/A

Section 13: Reduction of home energy needs, 2605(b)(16) – Assurance 16

13.1 Describe how you use LIHEAP funds to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance?

Indiana administers the Family Development Program which provides low income households with short and long term case management. As a part of this program, the clients were referred to other local services that will reduce barriers to self-sufficiency and energy security. Agencies also administer an energy education curriculum, whereby LIHEAP recipients receive energy conservation tips and techniques as well as energy conservation kits.

13.2 How do you ensure that you don't use more than 5% of your LIHEAP funds for these activities?

Indiana has budget restrictions that ensure Assurance 16 expenditures are compliant.

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

Indiana is currently amending its database to track the impact of Assurance 16 activities.

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

Indiana provided \$1.7 million in benefits.

13.5 How many households applied for these services?

Indiana is currently amending its database to track the impact of Assurance 16 activities.

13.6 How many households received these services?

Indiana is currently amending its database to track the impact of Assurance 16 activities.

Section 14: Leveraging Incentive Program, 2607A

14.1 Do you plan to submit an application for the leveraging incentive program?

Yes No

14.2 Describe instructions to the third parties and/or local agencies for submitting LIHEAP leveraging resource information and retaining records.

All local service providers receive a copy of the leveraging report template along with instructions for completion.

14.3 For each type of resource and/or benefit to be leveraged in the upcoming year that will meet the requirements of 45 C.F.R. § 96.87(d)(2)(iii), describe the following:

What is the type of resource or benefit?	What is the source(s) of the resource?	How will the resource be integrated and coordinated with the LIHEAP program?
Utility Assistance	Utility companies through customer donations and foundation contributions	Clients are eligible for additional account credit to relieve the household energy burden.
Cash Assistance	Utility companies, local nonprofit organizations, and township trustee offices	Local service providers work with client to locate local resources to cover reconnect fees or the different between the LIHEAP benefit and their disconnect amount.
In-kind donations	Utility companies, local nonprofit organizations, and township trustee offices	Local service providers work with client to locate local resources to cover reconnect fees or the different between the LIHEAP benefit and their disconnect amount. Additionally, donors have provided clients with fans for cooling.

Section 15: Training

15.1. Describe the training you provide for each of the following groups:

a. Grantee Staff:

Formal training on grantee policies and procedures

How often?

Annually

Biannually

As needed

Other – Describe:

Employees are provided with policy manual

Other – Describe:

b. Local Agencies:

Formal training conference

How often?

Annually

Biannually

As needed

Other – Describe:

On-site training

How often?

Annually

Biannually

As needed

Other – Describe:

Employees are provided with policy manual

Other – Describe:

c. Vendors

Formal training conference

How often?

Annually

Biannually

As needed

Other – Describe:

Policies communicated through vendor agreements

Policies are outlined in a vendor manual

Other – Describe: Annual meeting

15.2. Does your training program address fraud reporting and prevention?

Yes

No

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

16.1 Describe performance goals and measures that will be tracked for the upcoming Federal fiscal year.

For FY 2015, Indiana will be able to track:

- Number of households where crisis prevent the disconnection of service
- Number of households where services were restored as a result of LIHEAP benefits.

Indiana will be working with database consultants and utility vendors to report benefit targeting and energy reduction.

16.2 Summarize results of performance goals and measures for the prior Federal fiscal year.

There were no performance goals prior to this federal fiscal year.

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

17.1. Fraud Reporting Mechanisms

a. Describe all mechanisms available to the public for reporting cases of suspected waste, fraud, and abuse.

- Online Fraud Reporting
- Dedicated Fraud Reporting Hotline
- Report directly to local agency/district office or Grantee office
- Report to State Inspector General or Attorney General
- Forms and procedures in place for local agencies/district offices and vendors to report fraud, waste, and abuse.
- Other – describe:

b. Describe strategies in place for advertising the above-referenced resources.

- Printed outreach materials
- Addressed on LIHEAP application
- Website
- Other – describe:

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.

REQUIRED Type of Identification Collected	Collected from Whom?		
	Applicant Only	All Adults in HH	HH Members Seeking

			Assistance*
Social Security Card is photocopied and retained	Required <input type="checkbox"/>	Required <input checked="" type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>
Social Security Number (without actual card)	Required <input type="checkbox"/>	Required <input checked="" type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input checked="" type="checkbox"/>	Requested <input type="checkbox"/>
Government-issued identification card (i.e.: driver's license, state ID, Tribal ID, passport, etc.)	Required <input type="checkbox"/>	Required <input checked="" type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>
Other:	Required <input type="checkbox"/>	Required <input type="checkbox"/>	Required <input type="checkbox"/>

*Households may include members who are not seeking assistance and may not be included in the household count.

b. Describe any exceptions to the above policies.

Indiana requires social security cards for all persons, age one (1) and over. Indiana will allow a person to provide a document with the full social security number as long as the following criteria are met:

- The document comes from another federal or state agency- such as verification of TANF, WIC, SNAP, or SS benefits.
- The applicant can provide a photo ID card to corroborate the name and address of the applicant.
- The applicant meets all other eligibility criterion.
- The applicant has received LIHEAP benefits in a previous program year.

17.3. Identification Verification

Describe what methods are used to verify the authenticity of identification documents provided by clients or household members.

- Verify SSNs with Social Security Administration
- Match SSNs with death records from Social Security Administration or state agency
- Match SSNs with state eligibility/management system (e.g., SNAP, TANF)
- Match with state Department of Labor system
- Match with state and/or federal corrections system
- Match with state child support system
- Verification using private software (e.g., The Work Number)
- In-person certification by staff
- Match SSN/Tribal ID number with tribal database [
- Other – describe:

17.4. Citizenship/Legal Residency Verification

What are your procedures for ensuring that household members are U.S. citizens or aliens who are qualified to receive LIHEAP benefits?

- Clients sign an attestation of citizenship or legal residency
- Clients' submission of Social Security cards is accepted as proof of legal residency
- Noncitizens must provide documentation of immigration status
- Citizens must provide a copy of their birth certificate, naturalization papers, or passport
- Noncitizens are verified through the SAVE system
- Tribal members are verified through Tribal database/Tribal ID card
- Other – describe:

17.5. Income Verification

What methods does your agency utilize to verify household income?

- Require documentation of income for all adult household members
 - Pay stubs
 - Social Security award letters
 - Bank statements
 - Tax statements
 - Zero-income statements
 - Unemployment Insurance letters
 - Other – describe:

- Computer data matches:
 - Income information matched against state computer system (e.g., SNAP, TANF)
 - Proof of unemployment benefits verified with state Department of Labor
 - Social Security income verified with SSA
 - Utilize state directory of new hires
- Other – describe:

17.6. Protection of Privacy and Confidentiality

Describe the financial and operating controls in place to protect client information against improper use or disclosure.

- Policy in place prohibiting release of information without written consent
- Grantee LIHEAP database includes privacy/confidentiality safeguards
- Employee training on confidentiality for:
 - Grantee employees
 - local agencies/district offices
- Employees must sign confidentiality agreement

- Grantee employees
- local agencies/district offices
- Physical files are stored in a secure location
- Other – describe:

17.7. Verifying the Authenticity of Energy Vendors

What policies are in place for verifying vendor authenticity?

- All vendors must register with the State
- All vendors must supply a valid SSN or TIN/W-9 form
- Vendors are verified through energy bills provided by the household
- Grantee and/or local agencies/district offices perform physical monitoring of vendors
- Other – describe, and note any exceptions to policies above:

17.8. Benefits Policy – Gas and Electric Utilities

What policies are in place to protect against fraud when making benefit payments to gas and electric utilities on behalf of clients?

- Applicants required to submit proof of physical residency
- Applicants must submit current utility bill
- Data exchange with utilities that verifies:
 - Account ownership
 - Consumption
 - Balances
 - Payment history
 - Account is properly credited with benefit
 - Other – describe:
- Centralized computer system/database tracks payments to all utilities
- Centralized computer system automatically generates benefit level
- Separation of duties between intake and payment approval
- Payments coordinated among other heating assistance programs to avoid duplication of payments
- Payments to utilities and invoices from utilities are reviewed for accuracy
- Computer databases are periodically reviewed to verify accuracy and timeliness of payments made to utilities
- Direct payment to households are made in limited cases only
- Procedures are in place to require prompt refunds from utilities in cases of account closure
- Vendor agreements specify requirements selected above, and provide enforcement mechanism
- Other – describe:

17.9. Benefits Policy — Bulk Fuel Vendors

What procedures are in place for averting fraud and improper payments when dealing with bulk fuel suppliers of heating oil, propane, wood, and other bulk fuel vendors?

- Vendors are checked against an approved vendors list
- Centralized computer system/database is used to track payments to all vendors
- Clients are relied on for reports of non-delivery or partial delivery
- Two-party checks are issued naming client and vendor
- Direct payment to households are made in limited cases only
- Conduct monitoring of bulk fuel vendors
- Bulk fuel vendors are required to submit reports to the Grantee
- Vendor agreements specify requirements selected above, and provide enforcement mechanism
- Other – describe:

17.10. Investigations and Prosecutions

Describe the Grantee's procedures for investigating and prosecuting reports of fraud, and any sanctions placed on clients/staff/vendors found to have committed fraud.

- Refer to state Inspector General
- Refer to local prosecutor or state Attorney General
- Refer to US DHHS Inspector General (including referral to OIG hotline)
- Local agencies/district offices or Grantee conduct investigation of fraud complaints from public
- Grantee attempts collection of improper payments. If so, describe the recoupment process.
- Clients found to have committed fraud are banned from LIHEAP assistance. For how long is a household banned?
- Contracts with local agencies require that employees found to have committed fraud are reprimanded and/or terminated
- Vendors found to have committed fraud may no longer participate in LIHEAP
- Other — describe: