Low Income
Home Energy Assistance Program

New Manager/Refresher
EAP Training

PY2016
DEPARTMENT OF ENERGY PROGRAMS

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Monitoring Consultants- Engaging Solutions
TOP 12 THINGS YOU SHOULD KNOW AS A PROGRAM MANAGER

• How Indiana applies the 16 LIHEAP assurances to the program model, specifically how Indiana applies Assurance 3 &16 to the program

• How is weatherization integrated into your program and how clients are referred to the weatherization program

• How the program budget works, especially the admin portion: including definition of admin and how admin is monitored as well as the Assurance 16 line items

• The correct timelines for processing appointments, mail applications, and crises

• The definition of crisis, life- threatening crisis, and how this process should be applied at your agency

• Understand how Indiana uses the benefit matrix to ensure that the households with the lowest income and highest energy burden receive the highest energy benefit
TOP 12 THINGS YOU SHOULD KNOW AS A PROGRAM MANAGER

• The appeals process for clients

• What is the process for approving benefits, transmittals, and requesting payment

• Understand the eligibility guidelines

• Understand the program integrity components of the program

• The state’s fraud policies and the correct procedure for resolving a fraud case at your agency, as well as when to involve the state

• Stay abreast of the most recent policy or procedure changes, as well as communicate them to your staff and executive leadership
16 ASSURANCES

- Use of Funds
- Make Payments
- Conduct Outreach Activities
- Coordinate with other low income programs
- Provide assistance to households with highest energy burden and lowest income
- Coordinate service delivery with local nonprofits
- Pay energy vendors
- Equitable treatment of clients
- Administrative expenses (State 1.5% and Agencies 8.5%)
- Fiscal Compliance
- Cooperate with Federal Investigations, when necessary
- Public Participation in State Plan Development
- Data Collection
- Coordinate with state welfare agencies, where necessary
- Coordinate up to 4% for Energy Education and Case Management
HOW DOES THE MONEY FLOW?

President submits a budget

Congress approves a budget

Funds are allocated to the federal agencies (Health and Human Services)

Funds are then allocated to the States

States allocate funds to the eligible entities via contract
NEW EAP BUDGET NARRATIVE

**Administrative Line Items**
- Eligibility (based on expenditures) 8.5%
- Program Support (total award) 3%
- Technology 2%
- Family Development (total award) 2%

13.5% Limit.

**Technology Enhancements**
- Up to 2% of total award
To support technology development or enhancements; must request prior approval

**Energy Education**
- Energy Education and Materials/Supplies Up to 3% of total award

**Regular/Crisis Assistance**
- Regular Assistance
- Crisis Assistance Must set aside 8% budget thru 3/15/15

**Summer Cool Program**
- Summer Cool Benefits
- Summer Cool A/Cs Will not budget until after winter ends

**ihcda**
Indiana Housing & Community Development Authority
FAMILY DEVELOPMENT

• Assurance 16 activities are designed to reduce home energy needs and thereby the need for future energy assistance.

• Agencies will be encouraged to work with clients in compliance with the Indiana Family Development Process, a case management approach toward self-sufficiency with an energy conservation emphasis.

• Agencies will then take a holistic approach at guiding families toward self-sufficiency.
ENERGY EDUCATION

• Goal is to “encourage and enable households to reduce their home energy needs and need for EA” (per Assurance16)

• Through the program, agencies should educate the households with the highest energy burden and the lowest income

• Energy Education sessions may be conducted as:
  • One on one sessions with clients during the EAP appointment
  • Group sessions
  • Display materials in waiting areas during hours of frequent appointments
2016 EAP PROGRAM CALENDAR

MAIL APPLICATIONS
September 1
*Service Delivery Plan Due on September 7

SCHEDULE APPOINTMENTS/NEW CONTRACT BEGINS
October 1

WINTER ASSISTANCE PROGRAM
November 2 - May 13

SUMMER COOLING PROGRAM
June 6 - August 12

STATE EAP FUNDS
October 1 – September 30
CONTRACTS AND BUDGETS

Contract Components

• Administration of Funds (Section 4)
• Ineligible Expenses (Section 5)
• File Retention Policy (Section 6)
• Modifications (Recapture and reallocate funds) (Section 7)
• Air Conditioner Distribution (Section 9)
• Program Income (Section 15)

Attachment A

• Outlines the award amount
• How costs are claimed

Blank Budget Form

• Must be completed and returned with the signed contract
Low Income Home Energy Assistance Program
LI-14-04: Recapture and Redistribution of Funds
Effective Date: February 13, 2014

Policy: To ensure that LIHEAP dollars are maximized for the duration of the program year, local service providers are required to conduct periodic funding analyses and remit the information to the Community Programs Manager for review. The funding analyses are due February 28, April 25, and June 30 of each program year. The local service provider will submit the following report for each funding source to the Community Programs Specialist. The final report is reviewed by the Community Programs Manager and funding recommendations are submitted to the Chief Community Programs Officer for final approval.
## PY2016 BUDGET

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ISSUES WITH BUDGET PROJECTIONS

The State Program is allowed to carryover up to 10 percent of the total award.

Common Issues with Budget Projections

• Spend more than the agency sent as a projection for each line item
• Overestimate line items until the end of the program and have a large carryover amounts.
• Benefit projections do not include transmittals that are pending approval from utility vendors.
• Underestimated eligibility expenses and overdrawn allowable budget percentages.
ELIGIBILITY
FORMS REVIEW

• Landlord Affidavit
  • Used to document leasing info when a lease is not available
  • Must document dwelling type, responsibility of utilities, and confirm if the applicant is receiving rental subsidy
  • Should be updated within 24 months of application date

• Zero Income Claimant Affidavit
  • Must be completed for each resident, age 18 and over, reporting no income for any months
  • Weatherization Notary Area

• Refund Affidavit
  • Photo ID or notorized
  • Award Letter
COMPLETING AN EAP APPLICATION

• Verify Social Security Numbers
  • Verify SSN for each household member age 1 and over
  • Mixed households allowed as of PY2016

• Verify Utilities
  • Utilities must be in a household resident’s name, age 18 and over
  • Service address must match the address on EAP application
  • Confirm if the clients are in “crisis”

• Verify Dwelling and Housing Status w/ Lease or Landlord Affidavit (and POA paperwork, if applicable)
  • Confirm housing type (apartment, duplex, house, mobile, etc)
  • Confirm address on lease matches EAP application
  • Verification that the client lives in subsidized or unsubsidized housing

• Complete income verification
  • Income is calculated for each resident age 18 and over.
  • Counted for 12 months prior to application date
ZERO INCOME CLAIMANT

Requirements
• Household resident, age 18 and over, claims no income for 12 months
• Must complete zero income claimant form
• Must validate how the client survived without income
• Must provide documentation from DWD (or Work One) that confirms no income

Common Issues with Zero Income Claimant Form
• Accidentally reports income and doesn’t know it
• Forgets to sign the form
• Doesn’t provide Work One documentation
• Agencies doesn’t complete form for each person with no income
APPLICATION APPROVAL

- **Complete the Benefit Matrix**
  - Assess poverty level
  - Benefit based on points
  - Dwelling type
  - Housing status
  - At-risk
  - Fuel Type
  - Electric benefit
  - Regional differential
  - State EAP for Homeowners

- **Issues that will arise**
  - Inoperable heating sources
  - Large credits
  - Bill is more than benefit with crisis
  - No funding available

- **Complete the Notification Letter**
REGULAR BENEFITS

Once the matrix points are assessed, the system will take the total points times $20, add a regional differential, and a $75 electric credit.

Primary Heating Source
• Take the total benefit amount and subtract $75
• that total equals the heating credit

Electric Bill Credit
• Add $75

• If both bills are included in rent, then no benefits are distributed
• If one bill is included in rent, then the client is eligible for the benefit that is not included
• If crisis assistance is necessary, then the crisis benefits are added at this time
DEFINITION OF CRISIS AND RESPONSE

202.1 Crisis

A crisis means an energy emergency where:
- a household is in imminent danger of disconnection,
- already shut-off,
- is low on heating fuel which is defined as at or below 25% of a tank, or
- is totally out of heating fuel.

A household that is in imminent danger has received a notice for disconnection from a utility vendor or has a low fuel tank, but has not yet been disconnected or actually run out of fuel.
DEFINITION OF CRISIS AND RESPONSE

202.2 Life-threatening Crisis

A life-threatening crisis means an urgent energy emergency where: a household is unable to safely reside in their home without active heating or cooling conditions due;

- Inoperable heating or cooling system,
- or already being completely shut off or disconnected.

Timely Intervention - Assistance must be provided within 18 hours of the time of the application, if a life-threatening situation exists. This response must be designed to protect the health and safety of the household members. For the agency’s part, the extension of Crisis benefits and other services constitutes a proper response to the emergency.

*Agency’s must have a weekend response protocol.
CRISIS ASSISTANCE

Eligibility requirements
• To be eligible for crisis assistance, the client must present one of the following conditions:
  • Disconnected utility
  • A pending disconnect (or in imminent danger of disconnect)
  • Out of fuel (for unregulated clients)

Documentation
• Must present a bill or letter stating that one of the conditions exists
• For bulk fuels clients, the documentation may say, “cash per delivery” or amount needed to receive a fill in the tank

**Please note that clients with subsidized housing are not eligible for crisis assistance**
CRISIS BENEFITS-REGULATED UTILITIES

• To be eligible for crisis assistance, the client must present one of the following conditions:
  • Disconnected utility
  • A pending disconnect (or in imminent danger of disconnect)
  • Out of fuel (for unregulated clients)

• To calculate crisis benefits for these clients:
  • Take the amount of the regular benefit
  • Subtract the disconnect amount
  • Crisis will be allocated for the difference up to $200, for regulated utilities

If the regular benefit is enough to resolve the crisis, then crisis benefits are not needed
CRISIS BENEFITS-
UNREGULATED UTILITIES

• To be eligible for crisis assistance, the client must present one of the following conditions:
  • Out of fuel (for unregulated clients)

• Bulk fuel clients are eligible for $400 in crisis

• They can receive crisis at the time of application or come back at a later date for the crisis

• Bulk fuel clients can receive the $400 if documentation supports the need or you can use the following calculation
  • Take the amount of the regular benefit
  • Subtract the disconnect amount
  • Crisis will be allocated for the difference up to $200, for regulated utilities
UTILITIES WITH CREDITS

Regulated Utilities
- Clients with credits $500 and over can waive their EAP benefit for that utility
- The waiver will allow the client to do one of the following:
  - Have the credit the other utility
  - Set the funds aside and come back for them when the credit is below $500

Unregulated Utilities
- Clients with credits $500 and over on *unregulated utilities* may receive benefits as normal
APPLICATION SITES AND PROCESSING

• IHCDA must be informed of all local application sites, addresses, phone numbers, and times of operation by **September 7, 2015**.

• This information should be included in the agency’s Grantee Plan Packet submitted to the Community Programs Analyst at vmorrismay@ihcda.in.gov.

• After November 2, households must be notified in writing of their eligibility and the amount of their benefit, or their denial, within **10 working days** of the application's completion, if the application was taken via an appointment. For mail applications, notification of approval or denial must be completed within **60 days** of application completion.
GETTING THE WORD OUT

• Identify and contact important media partners
• Utilize local service providers to inform their clients of important EAP dates and locations
• Social Media
• Agency newsletter or annual report to community
MAIL- IN PROCESS
ASSURANCE 3

Target Three At-Risk Populations
• Households with children under age 5
• Persons with Disability
• Elderly

Timeline
• Can be mailed as early as September 1st
• Must be processed within 60 days
• Should receive same priority as walk-ins and in-office appointments
• Same eligibility requirements
APPEALS PROCESS

Clients have 10 days from the time they receive their approval or denial to make an appeals.

Client may appeal, but are not limited to, the following customer service experience, benefit amount and denial.

Clients must appeal to the LSP first. Thereafter, clients may appeal to Community Programs Manager at IHCDA.

IHCDA may request the file from agency to re-determine eligibility.

IHCDA will respond to all appeals within 10 days.
MORATORIUM PROTECTION REVIEW

Legal Authority: Indiana Code 8-1-2-121 (became effective in 1983)

Purpose: Prevents the termination of residential utility service to any customer who is eligible for and has applied for the Energy Assistance Program

Protection Period: December 1 to March 15

Client’s Qualifications for Protection:
• The customer has submitted a complete application and eligibility is being determined by the local CAA or their subcontractor on or after October 1.
• The customer has furnished proof to the utility provider of his/her application to receive such benefits, or IHCDA, the local CAA or the CAA’s subcontractor has notified the utility in writing.
• The customer must have active service that is NOT in disconnect status on December 1
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.
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.
PROTECTION 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 this HOLD status, will be placed on a report. That report will be submitted to the utility vendors to ensure moratorium protection.
EAP AND WEATHERIZATION

• Refer all interested clients to Weatherization

  • DOE funding will allow household income up to 200% of poverty – so even if the client does not qualify for LIHEAP they might qualify for DOE and can possibly receive Weatherization services

  • Referring these clients will help Weatherization access all potentially qualified households
WEATHERIZATION IS...

• The Weatherization Assistance Program [WAP] is an energy efficiency program

  • Measures installed are based upon expected energy savings associated with the measures – must meet savings to investment ratios
    - The measures must generate more dollars in energy savings during their expected lifetime than they cost to install

  • Blower door directed air sealing, exterior wall insulation, attic insulation, crawl space insulation, base load measures, etc.
WEATHERIZATION IS NOT…

• The Weatherization Assistance Program **is not** a window and door replacement program
  
  • Doors and windows should rarely be replaced and should rarely be weather-stripped

• The WAP is not a rehabilitation or remodeling program
  
  • Again the focus is on energy efficiency – not major home repair
WEATHERIZATION IS NOT...

- The WAP **is not** an automatic furnace replacement or “No Heat Emergency” program

- Furnaces, water heater and gas cook stoves will be replaced as Health & Safety dictates – they are not automatically replaced as a result of Weatherization services being provided
  - Reasons for heating system replacement must be justified by Health & Safety testing, efficiency testing or condition
  - Gas cook stoves will be replaced only when cleaning and adjusting will not solve high carbon monoxide issues
    - Electric cook stoves cannot be addressed by Weatherization
WHAT IS PROGRAM INTEGRITY?
Program Integrity - multi-faceted approach to protect LIHEAP funds from fraud, waste, and abuse

SSN & Income Verification
• SSNs for all residents age 1 and over
• Clients who cannot provide their SSN should be documented as an ineligible household member
• Clients must provide documentation or affidavits to certify income
• Zero income claimants must sign income affidavit and provide Work One

Monitoring
• Agencies are required to monitor at least 30% of their files within 45 days of their completion
• State will hire monitoring consultants
• State will monitor at least 3% of all client eligibility files for the year

Quality Improvement Plan
• Agencies with an error rate of 15% or higher are eligible for additional monitoring, training, and technical assistance
WHAT IS PROGRAM INTEGRITY?

**Monitoring**
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**Quality Improvement Plan**
- Agencies with an error rate of 15% or higher are eligible for additional monitoring, training, and technical assistance
SECTION 700

• Internal Controls Policy in place
• QA 30% of all files within 45 days of their completion
• Special Review for Employees and Relatives
• Fraud, Waste and Abuse Procedures
• Corrections after QA and Monitoring
• SSN Validation
• Storage
(NEW) FRAUD, WASTE AND ABUSE

Each applicant is entitled to an investigation, therefore it is important that the LSP information gather prior to using any language that suggests the client has committed fraudulent activity prior to any complete investigation.

**Investigative Steps:** An investigation is a detailed examination or search to determine if an individual has committed an act of non-compliance or fraud and/or received benefits to which they were not entitled, resulting in a claim.
When an investigation is started the following steps should be followed:

1. An In-House Investigation: These are things that can be done at the agency through the agency’s records and database.
   a. **Determine Eligibility Factors:** Based on the information received from the applicant, are they eligible for energy assistance? If there is a specific eligibility question for the applicable time period, consult the Energy Assistance Guidelines for that time period.
   b. **Review Background Information:** Review background information that is available at the agency about the applicant. There are several different sources available:
      i) Previous EAP application
      ii) RIAA database
      iii) Public and Government Websites
Determine whether the information received from the applicant conflicts with any information found during the background checks or received from an informant. If there are no conflicts, there is no need to proceed any further. If information does conflict in some fashion, further investigation is needed.

**Documentation:** It is vital that you document, in chronological order, each step taken in the course of the investigation. This will provide a detailed and complete record of the processes used and the information obtained. Documentation will include investigator notes as well as copies of relevant documents. These are not just important for agency records, but also in situations where law enforcement will need to be involved.
(NEW) FRAUD, WASTE AND ABUSE

There are six (6) basic questions to keep in mind while collecting information during the course of any investigation:

1. **WHO.** The case should include the names, addresses and phone numbers of the applicant and other contacts made regarding the investigation.
2. **WHAT.** The case notes should reflect all the eligibility factors being investigated, such as: income, household composition, resources, living arrangements, etc. Make sure the applicant is eligible in all areas of eligibility, not just the area that prompted the investigation.
3. **WHEN.** Write down the date and time of all contacts made during the investigation. This will be needed should the case be appealed or if law enforcement gets involved.
(NEW) FRAUD, WASTE AND ABUSE

4. **WHERE.** Write down the correct address, location and time of any interview, home visit or other fact gathering activity.

5. **WHY.** Write down the reason(s) for the investigation in the first place and reasons for any actions on the case.

6. **HOW.** Document the way in which the information was received.

**Potential Sources (To assist with your investigation):**

Employment Records, Utility and Phone Bill, Landlord or Mortgage Company, Courthouse and/or Recorders Office Records, Sheriff or Police Department
Confidentiality: The investigation of possible fraud, waste or abuse should be kept as confidential as possible. This is done to ensure the integrity of the investigation. The more people who know about an investigation, the greater the chances of the subject finding out about the investigation. Knowledge of and participation in an investigation should be shared only with necessary persons.

Final Steps: Once the violation has been identified, investigated and supporting documentation has been reviewed and corroborated by the agency, action needs to be taken against the participant’s application or against their benefits if they have already been distributed. Actions taken can range from the rejection of the application to the termination of benefits and request for repayment of funds. The case can also be submitted to Federal Officials if the situation warrants.
The IHCDA Community Programs Monitor and Compliance Attorney are available to assist at any phase of the investigation, if needed. However, be sure to make the IHCDA Community Programs Monitor aware of all substantiated acts of fraud, waste and abuse. He will then contact IHCDA’s Compliance Attorney if the situation warrants.
QUESTIONS
GETTING AHEAD OF MONITORING CONCERNS

• State EAP Application (Flush vs. Crisis)
  • Making the most of the benefit

• What belongs in the file and what does not

• Communication with IHCDA Monitor

• Approved documents are being collected from client

• Income Calculation

• What’s your process? Is it effective and efficient?
  • Intake (document checkers, processors, follow-up)
  • Mail-ins out early (can QA early/detect errors and correct)
  • QA monitor (file reviews and assurances)
CALCULATING INCOME
CALCULATE EARNED INCOME USING TAX FORMS

Tax Returns
• Must be the most current tax return
• If the clients applies after April, then forms should be completed in April of the same year
• If client applies before April, then forms may have been completed in April of the previous year

W-2s and 1099s
• Good through April 15
• If self-employed, the client is not eligible to deduct utility expenses from these forms

Tax Information for Self Employed
• Must have the tax return and the schedule
• Must follow the same rules for Tax Returns
CALCULATE EARNED INCOME USING PAYSTUBS

Twelve (12) months of income directly preceding the application date and must include the month of application.

To calculate income using a paystub, use the following formula:

**Step 1:** Gross year to date income from all paystubs provided and add the totals together. This total equals the estimated monthly income.

**WAAALAAHHH!!!**

Please note: If the pay month is December, take the gross year to date income only.
CALCULATE EARNED INCOME USING WAGE INQUIRIES

Use the quarters that correspond to 12 months prior to the application date. Wages are listed by quarter and year. The first number is the quarter, and the second number is the year that wages were reported. See the following example.

1/4- First Quarter 2014 or January through March
2/4- Second Quarter 2014 or April through June
3/4- Third Quarter 2014 or July through September
4/4- Fourth Quarter 2014 or October through December

If there is an instance where you need one or two months instead of the entire quarter:

**Step 1:** Take the total amount of all income listed for that quarter.

**Step 2:** Divide the quarter by three (3), or three months

**Step 3:** Multiply that amount times the number of months needed (one or two)

Do not split months in half and do not split quarters into weeks or days.
CALCULATE UNEARNED INCOME FOR MONTHLY BENEFITS

Social Security, Pension/Annuities, Disability payments, etc.

When using a monthly amount:
• Compute the annual income based on the current month’s income times twelve (12). Bank Statements are allowed.

No COLA!!!
INCOME CALCULATION:
UNEMPLOYMENT STATEMENTS

All unemployment is calculated by the gross Weekly Benefit Amount (WBA) or Deductions and Entitlement amounts together for gross benefit.

The Old Statement:
• CLAIM INDEX INQUIRY - use WBA
• VOUCHER HISTORY INQUIRY - use Benefit Pay Amount
• CLAIM MASTER INQUIRY - use Original WBA
• WAGE/BENEFIT TRANSCRIPT - use WBA for unemployment and wage history for earned income

The New Statement:
• Uplink Unemployment Payment Summary - Add the deductions and entitlement amounts together for gross benefit.
## DOCUMENT REVIEW

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QUALITY ASSURANCE REVIEW
AGENCY QUALITY REVIEWS

• Agencies must review at least 30 percent of its client files within its service territory, within 45 days of their completion

• Agency should set benchmarks for completing the required reviews by the end of the program year

• Ensure that transmittals are processed within 5 days

• Ensure all credits, overpayments and payments have been submitted to the appropriate party (client, vendor or IHCDA)
COMPLETE APPLICATION (QA)

Appendix W:
1. Signed Completed Application (State Form 14981)
   • In-person or Mail-In Application
2. Social Security Numbers for All HH members over age of 1 years old
3. All HH Income and Verification Documentation
   • Income Verification Form
   • Zero Income Affidavit
   • Award Letter
   • Pay Stub
   • Copy of W-2 or Tax Form
   • Wage Inquiry
   • Bank Statement
4. Current Utility Bill(s), in a HH member’s name or landlord
5. Things to Remember Form
6. Lease or Landlord Affidavit (For Renters)
7. Letter of Approval, Missing Information or Denial Letter
COMPLETE APPLICATION (QA)

• **Complete the Benefit Matrix**
  - Assess poverty level
  - Benefit based on points
  - Dwelling type
  - Housing status
  - At-risk
  - Fuel Type
  - Electric benefit
  - Regional differential
  - State EAP for Homeowners

• **Issues that will arise**
  - Inoperable heating sources
  - Large credits
  - Bill is more than benefit with crisis
  - No funding available

• **Complete the Notification Letter**
EAP PAYMENT PROCESS

• Agencies will notify utility vendors of approved applicants at least weekly

• Notification will be sent via transmittal process (within 5 days)

• Utility vendors will approve and send back for submission or submission with corrections

• Agencies must make all changes prior to submission to IHCDA
CLAIMS TRANSMISSION

Claims Type:
1. Grantee Payment
2. Third Party Payment
3. Adjustment
4. Return of Funds
5. Repayment (Grantee and Third Party)
6. Program Income

Submission Requirements:
1. Signature Form
2. ACH – Banking Information submitted through IHCDA Online
3. Taxpayer ID Number
4. All required program documents (Wood Vendor Receipts, Updated Bill, Transmittal)
5. Approved Cost Allocation Plan (Send to A133@ihcda.in.gov by 3/31/15)
IHCDA ANNUAL MONITORING

- IHCDA has contracted with Engaging Solutions, Inc. to provide onsite monitoring

- Monitors at least 3% of agency’s total files from the previous year

- Review includes the following components:
  - Entrance and Exit Interviews
  - Client Eligibility Review (approved and denied files)
  - Fiscal Review
  - Interview with program management staff

- Notified at least 30 days in advance
- File review list is submitted on a different schedule
SUBMITTING FILES FOR REVIEW

Beginning PY2016, LSPs should enhance their systems to scan all files into the RIAA system.

When notified of onsite or desktop monitoring, this will be completed within 30 days in the RIAA system.
IHCDA ANNUAL MONITORING

- Monitoring Reports are issued 30 days from the exit interview
  - If there were outstanding issues, the report is issued 30 days from the last day of the waiting period

- Monitoring responses are due 30 days from receipt and sent to IHCDA

- IHCDA will review the response and submit a letter within 15 days of receipt

- If the agency contests IHCDA’s response, the agency can respond within 15 days of receipt (ongoing)

- For final determination, the agency must request a final review by the Chief Community Programs Officer, Donna Billiard-Wright
QUALITY IMPROVEMENT PLAN (QIP)

QIP Eligibility Requirements
• The total number of findings and/or concerns divided by the number of files reviewed equals 20 percent or more

What’s in the QIP
• Requires the agency to inform IHCDA in writing what actions the agency will put in place to reduce the number of errors to an acceptable level.
• May include increased training, additional QA procedures increase percentage of files QA’d, assigning staff to specialized duties, hiring extra staff, and many more possible actions.

QIP Monitoring
• IHCDA will visit the agency at least three more times no less than 30 days apart to gauge the progress and effectiveness of the quality improvement plan
• Will consist of 50 files pulled at random and completely reviewed on three separate occasions
• Successful completion of the Quality Improvement Program is achieved when on each QIP visit there are no more than 5.99 errors (findings and concerns \( \frac{5.99}{30} = .1997 \)).
MODIFIED QUALITY IMPROVEMENT PLAN (MQIP)

**MQIP Eligibility Requirements**
- The total number of findings and/or concerns divided by the number of files reviewed equals 15 percent or more.

**What’s in the MQIP**
- Requires the agency to inform IHCDA in writing what actions the agency will put in place to reduce the number of errors to an acceptable level.
- May include increased training, additional QA procedures increase percentage of files QA’d, assigning staff to specialized duties, hiring extra staff, and many more possible actions.

**MQIP Monitoring**
- IHCDA will visit the agency at least three more times no less than 30 days apart to gauge the progress and effectiveness of the quality improvement plan.
- Will consist of 30 files pulled at random and completely reviewed on three separate occasions.
- Successful completion of the MQIP is achieved when on each QIP visit there are no more than 5.99 errors (findings and concerns $\{5.99/30 = .1997 \}$).
UNDERPAYMENTS

• If the review is completed and it is found that the client was due additional funds, then an additional transmittal is submitted to the vendor for the additional funds.

• These additional funds will be paid out of the agency’s current allocation. If the agency has spent out all program funds and an additional amount is owed, it must be paid by the Local Service Provider using non-federal funds.

• Agencies should continue to charge underpayments to their current grant allocation, as long as the funds are available. Additional funds will not be allocated, nor will leveraging funds be available to cover underpayments.
OVERPAYMENTS

• An overpayment occurs when it is found that a client was overpaid. There are funds that need to be returned to the program.

• The money is not due to the client, nor does it get added back into the agency’s budget.

• If the error is discovered after 60 days, the agency cannot process a negative transmittal.

• Agencies cannot pay for negative adjustments to client benefits with federal funds (Leveraging, CSBG, or otherwise). Agencies must pay for the overpayments from their corporate unrestricted funds. Overpayments will be applied back to the block grant, not the individual agency’s budget.

• Please note that utility vendors have the option to decline the overpayment request because services and/or discounts have been rendered to clients.
MEMORANDUM OF UNDERSTANDING

MOUs or Memorandum of Understanding is a contract between the utility vendors and IHCDA for the payment of EAP benefits.

Vendors must complete the MOU annually and return the IHCDA Community Programs Specialist at lobrien@ihcda.in.gov.

IHCDA will issue MOUs in August each year, however if the vendor does not return or misplaces their MOU they can contact IHCDA or the LSP to obtain a copy. The LSP should assist as needed.

Once there is an approved MOU recorded at IHCDA, payments can be dispursed.

Vendors are required to update the transmittals sent from the LSP prior to crediting any account, to ensure only active accounts receive benefits.
QUESTIONS??

For additional questions about EAP please contact Lynell Westbrook Gates at lwestbrook@ihcda.in.gov or 317.234.5303