

LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)

State of Louisiana

Proposed Detailed Model State Plan

Fiscal Year 2020



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DETAILED MODEL PLAN (LIHEAP)

Program Low Income Home Energy Assistance
Name:

Grantee Name: LOUISIANA

Report Name: DETAILED MODEL PLAN (LIHEAP)

Report Period: 10/01/2019 to 09/30/2020

Report Status: Submitted

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Mandatory Grant Application SF-424

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

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

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

* 1.a. Type of Submission: ☒ Plan	* 1.b. Frequency: ☒ Annual	* 1.c. Consolidated Application /Plan/Funding Request? Explanation:	* 1.d. Version: ☒ Initial ☐ Resubmission ☐ Revision ☐ Update
		2. Date Received:	State Use Only:
		3. Applicant Identifier:	
		4a. Federal Entity Identifier:	5. Date Received By State:
		4b. Federal Award Identifier:	6. State Application Identifier:
7. APPLICANT INFORMATION			
* a. Legal Name: Louisiana Housing Corporation			
* b. Employer/Taxpayer Identification Number (EIN/TIN): 45-4619102		* c. Organizational DUNS: 078424719	
* d. Address:			
* Street 1:	2415 QUAIL DR	Street 2:	
* City:	BATON ROUGE	County:	EAST BATON ROUGE
* State:	LA	Province:	
* Country:	United States	* Zip / Postal Code:	70808 -
e. Organizational Unit:			
Department Name: Energy Assistance		Division Name:	
f. Name and contact information of person to be contacted on matters involving this application:			
Prefix:	* First Name: Lauren	Middle Name:	* Last Name: Holmes
Suffix:	Title: Program Administrator	Organizational Affiliation: Louisiana Housing Corporation	
* Telephone Number: 225-754-1441	* Fax Number: 225-754-1469	* Email: lhartley@lhc.la.gov	
* 8a. TYPE OF APPLICANT: A: State Government			
b. Additional Description:			
* 9. Name of Federal Agency:			
		Catalog of Federal Domestic Assistance Number:	CFDA Title:
10. CFDA Numbers and Titles		93568	Low-Income Home Energy Assistance
11. Descriptive Title of Applicant's Project Low-Income Home Energy Assistance Program			
12. Areas Affected by Funding: State of Louisiana			
13. CONGRESSIONAL DISTRICTS OF:			

* a. Applicant 06		b. Program/Project: LA-Statewide	
Attach an additional list of Program/Project Congressional Districts if needed.			
14. FUNDING PERIOD:		15. ESTIMATED FUNDING:	
a. Start Date: 10/01/2019	b. End Date: 09/30/2020	* a. Federal (\$): \$0	b. Match (\$): \$0
* 16. IS SUBMISSION SUBJECT TO REVIEW BY STATE UNDER EXECUTIVE ORDER 12372 PROCESS?			
a. This submission was made available to the State under the Executive Order 12372			
Process for Review on :			
b. Program is subject to E.O. 12372 but has not been selected by State for review.			
c. Program is not covered by E.O. 12372.			
* 17. Is The Applicant Delinquent On Any Federal Debt?			
☐ YES ☒ NO			
Explanation:			
18. By signing this application, I certify (1) to the statements contained in the list of certifications** and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001) **I Agree ☒			
** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.			
18a. Typed or Printed Name and Title of Authorized Certifying Official Lauren Holmes		18c. Telephone (area code, number and extension)	
		18d. Email Address	
18b. Signature of Authorized Certifying Official 		18e. Date Report Submitted (Month, Day, Year) 09/04/2019	
Attach supporting documents as specified in agency instructions.			

Section 1 - Program Components

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

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

Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Washington, DC 20201

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

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13) Use of this model plan is optional. However, the information requested is required in order to receive a Low Income Home Energy Assistance Program (LIHEAP) grant in years in which the grantee is not permitted to file an abbreviated plan. Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

Section 1 Program Components

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	
		Start Date	End Date
☒	Heating assistance	11/15/2019	03/15/2020
☒	Cooling assistance	04/01/2020	09/30/2020
☒	Crisis assistance	10/01/2019	09/30/2020
☒	Weatherization assistance	07/01/2020	06/30/2021

Provide further explanation for the dates of operation, if necessary

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%.	Percentage (%)
Heating assistance	25.00%
Cooling assistance	37.50%
Crisis assistance	10.00%
Weatherization assistance	15.00%
Carryover to the following federal fiscal year	0.00%
Administrative and planning costs	10.00%
Services to reduce home energy needs including needs assessment (Assurance 16)	2.50%
Used to develop and implement leveraging activities	0.00%
TOTAL	100.00%

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

☐	Heating assistance	☒	Cooling assistance
☐	Weatherization assistance	☐	Other (specify:)

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

If you answered "Yes" to question 1.4, you must complete the table below and answer questions 1.5 and 1.6.

	Heating	Cooling	Crisis	Weatherization
TANF	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
SSI	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
SNAP	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No
Means-tested Veterans Programs	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

	Program Name	Heating	Cooling	Crisis	Weatherization
Other(Specify) 1		☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No	☐ Yes ☐ No

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?

SNAP Nominal Payments

1.7a Do you allocate LIHEAP funds toward a nominal payment for SNAP households? ☐ Yes ☒ No

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

1.7b Amount of Nominal Assistance: \$0.00

1.7c 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

Determination of Eligibility - Countable Income

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

☒	Gross Income
☐	Net Income

1.9. Select all 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
If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.	

Section 2 - HEATING ASSISTANCE

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

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

Section 2 - Heating Assistance

Eligibility, 2605(b)(2) - Assurance 2

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

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	State Median Income	60.00%

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

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

Do you require an Assets test ? ☐ Yes ☒ No

Do you have additional/differing eligibility policies for:

Renters? ☐ Yes ☒ No

Renters Living in subsidized housing ? ☒ Yes ☐ No

Renters with utilities included in the rent ? ☒ Yes ☐ No

Do you give priority in eligibility to:

Elderly? ☒ Yes ☐ No

Disabled? ☒ Yes ☐ No

Young children? ☒ Yes ☐ No

Households with high energy burdens ? ☒ Yes ☐ No

Other? ☐ Yes ☒ No

Explanations of policies for each "yes" checked above:

2.3 Renters living in subsidized housing, the amount of the utility allowance is deducted from the total energy cost. Households receiving a utility allowance greater than the utility bill are not eligible. Applicants over 60 years old are exempt from this requirement.

Contractors may utilize an appointment system to schedule a specific date and time to complete the application process for the elderly, and persons with disabilities or infirmity.

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 populations, e.g., benefit amounts, early application periods, etc.

Households containing one or more members of the targeted priority groups (elderly, disabled, young children) are eligible for one additional \$100 benefit payment per household.

The applicant's energy burden is automatically calculated using the Hancock Energy Software (HES). The highest total energy cost (TEC) is divided by the total household monthly gross income to determine the percentage of the household income used for energy costs.

The applicant's benefit amount is determined using a benefit matrix. Households with zero income are eligible to receive the maximum benefit payment allowed for their family size.

Eligible households can receive one benefit payment during the heating season.

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:			
See Attachment			
Benefit Levels, 2605(b)(5) - Assurance 5, 2605(c)(1)(B)			
2.6 Describe estimated benefit levels for FY 2020:			
Minimum Benefit	\$150	Maximum Benefit	\$600
2.7 Do you provide in-kind (e.g., blankets, space heaters) and/or other forms of benefits? ☐ Yes ☒ No			
If yes, describe.			
If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.			

Section 3 - COOLING ASSISTANCE

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

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

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:

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	State Median Income	60.00%

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.

Do you require an Assets test ? ☐ Yes ☒ No

Do you have additional/differing eligibility policies for:

Renters? ☐ Yes ☒ No

Renters Living in subsidized housing ? ☒ Yes ☐ No

Renters with utilities included in the rent ? ☒ Yes ☐ No

Do you give priority in eligibility to:

Elderly? ☒ Yes ☐ No

Disabled? ☒ Yes ☐ No

Young children? ☒ Yes ☐ No

Households with high energy burdens ? ☒ Yes ☐ No

Other? ☐ Yes ☒ No

Explanations of policies for each "yes" checked above:

3.3 Renters living in subsidized housing, the amount of the utility allowance is deducted from the total energy cost. Households receiving a utility allowance greater than the utility bill are not eligible. Applicants over 60 years old are exempt from this requirement.

Contractors may utilize an appointment system to schedule a specific date and time to complete the application process for the elderly, and persons with disabilities or infirmity.

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

Households containing one or more members of the targeted priority groups (elderly, disabled, young children) are eligible for one additional \$100 benefit payment per household.

The applicant's energy burden is automatically calculated using the Hancock Energy Software (HES). The highest total energy cost (TEC) is divided by the total household monthly gross income to determine the percentage of the household income used for energy costs.

The applicant's benefit amount is determined using a benefit matrix. Households with zero income are eligible to receive the maximum benefit payment allowed for their family size.

Eligible households can receive one benefit payments during the cooling season.

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:			
See Attachment			
Benefit Levels, 2605(b)(5) - Assurance 5, 2605(c)(1)(B)			
3.6 Describe estimated benefit levels for FY 2020:			
Minimum Benefit	\$150	Maximum Benefit	\$600
3.7 Do you provide in-kind (e.g., fans, air conditioners) and/or other forms of benefits? ☐ Yes ☒ No			
If yes, describe.			
If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.			

Section 4 - CRISIS ASSISTANCE

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

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

Section 4: CRISIS ASSISTANCE

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

4.1 Designate the income eligibility threshold used for the crisis component

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	State Median Income	60.00%

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

A crisis exists when a household's energy source for heating and/or cooling has been disconnected or scheduled for disconnection, depleted and there are insufficient resources to resolve the situation. A crisis may also include natural disaster events and supply shortage emergencies declared by state or federal government.

4.3 What constitutes a life-threatening crisis?

When an eligible household is faced with an adverse situation that jeopardizes the health and/or safety of the household members. This would include a household member that has a medical condition that require the operation of medical equipment, such as oxygen, and/or extreme weather conditions that would keep the household cool/warm.

Crisis Requirement, 2604(c)

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

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

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

Do you require an Assets test ? ☐ Yes ☒ No

Do you give priority in eligibility to :

Elderly?	☐ Yes ☒ No
Disabled?	☐ Yes ☒ No
Young Children?	☐ Yes ☒ No
Households with high energy burdens?	☐ Yes ☒ No
Other?	☐ Yes ☒ No

In Order to receive crisis assistance:

Must the household have received a shut-off notice or have a near empty tank?	☒ Yes ☐ No
Must the household have been shut off or have an empty tank?	☒ Yes ☐ No
Must the household have exhausted their regular heating benefit?	☐ Yes ☒ No
Must renters with heating costs included in their rent have received an eviction notice ?	☐ Yes ☒ No
Must heating/cooling be medically necessary?	☒ Yes ☐ No

Must the household have non-working heating or cooling equipment?		☒ Yes ☐ No
Other?		☐ Yes ☒ No
Do you have additional / differing eligibility policies for:		
Renters?		☐ Yes ☒ No
Renters living in subsidized housing?		☐ Yes ☒ No
Renters with utilities included in the rent?		☐ Yes ☒ No
Explanations of policies for each "yes" checked above:		
Eligible applicants are required to provide support documentation to establish a crisis situation. (i.e. Disconnect/Shut-Off Notice, Final Bill and proof of new account, doctor's statements or medical reports, written estimates to refill fuel tanks, and/or evidence of an economic hardship-monthly expenses and income).		
Determination of Benefits		
4.8 How do you handle crisis situations?		
☒	Separate component	
☐	Fast Track	
☒	Other - Describe: Disaster Relief LHC use of LIHEAP Funding for Disaster Relief is based on LIHEAP regulations at 45 C.F.R. 96.50(e). Allowable uses of LIHEAP funds to deal with crisis situations, particularly with respect to assistance for home energy related needs resulting from a hurricane or other natural disaster, include: - Costs to temporarily shelter or house individuals in hotels, apartments, or other living situations in which homes have been destroyed or damaged, i. e., placing people in settings to preserve health and safety and to move them away from the crisis situation. - Costs for transportation (such as cars, shuttles, buses) to move individuals away from the crisis area to shelters, when health and safety is endangered by loss of access to heating or cooling. - Utility reconnection costs - Repair or replacement cost for furnaces and air conditioners - Insulation repair - Coats and blankets, as tangible benefits to keep individuals warm - Crisis payments for utilities and utility deposits - Purchase and installation of fans and air conditioners - Purchase and installation of generators All related activities must be pre-approved by LHC and will be targeted to areas covered by a disaster declaration.	
4.9 If you have a separate component, how do you determine crisis assistance benefits?		
☒	Amount to resolve the crisis.	
☒	Other - Describe: Eligible households can receive only one crisis benefit payment, not to exceed \$475, during a 12 month period. For utility bill assistance, the crisis benefit payment will cover only the amount of the disconnect notice, if the services have NOT been disconnected at the time of application. If utilities have been disconnected at the time of application, the total benefit requested should include all costs to connect or reconnect services, except any other non-energy related charges. In the event a household is in transition, a Final Bill and proof of a new account, showing the total cost to restore services, should be used to provide assistance and calculate the benefit. The referenced bill should clearly state "Final Bill". A recent statement from the vendor, preferably on letterhead, within the past 30 days may be used to calculate a benefit payment. The intent of this provision does not arbitrarily substitute the mandatory Disconnect Notice, or cause any inconsistency with the LHC's established policy for LIHEAP crisis assistance. For equipment repair/replacement, the amount of the equipment plus installation, not to exceed \$475 per household.	

For disaster relief, the amount of the in-kind benefits, not to exceed \$475 per household.

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 Explain.

Contractors are required to provide crisis assistance to all eligible households within the designated service delivery area, indicated in the contract.

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 No, explain.

Travel to the sites at which applications for crisis assistance are accepted?

☐ Yes ☒ No If No, explain.

If you answered "No" to both options in question 4.11, please explain alternative means of intake to those who are homebound or physically disabled?

Contractors are required to make provisions for home-bound and infirmed applicants to complete an application by either traveling to the applicant's home or accepting a signed statement by the applicant that names an authorized representative to apply for LIHEAP services on their behalf.

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

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

Winter Crisis \$0.00 maximum benefit

Summer Crisis \$0.00 maximum benefit

Year-round Crisis \$475.00 maximum benefit

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

☒ Yes ☐ No If yes, Describe

Contractors may provide an in-kind benefit (in accordance with the Louisiana Disaster Relief Policy), not to exceed \$475 per household, in times of disaster relief. An explanation of the disaster should be included in the applicant's file.

The cost for disaster relief will be reimbursed to the contractor. The contractor should obligate the funds necessary to resolve the crisis situation in a timely manner.

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

☒ Yes ☐ No

If you answered "Yes" to question 4.14, you must complete question 4.15.

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

	Winter Crisis	Summer Crisis	Year-round Crisis
Heating system repair	☐	☐	☒
Heating system replacement	☐	☐	☒
Cooling system repair	☐	☐	☒
Cooling system replacement	☐	☐	☒
Wood stove purchase	☐	☐	☐
Pellet stove purchase	☐	☐	☐
Solar panel(s)	☐	☐	☐
Utility poles / gas line hook-ups	☐	☐	☐
Other (Specify): Contractors may provide minor repair or replacement up to \$475 of heating or cooling	☐	☐	☒

equipment. An explanation of the emergency should be included in the applicant's file. The cost for equipment plus installation, if any, will be reimbursed to the contractor not to exceed \$475. The total reimbursement from LIHEAP may not exceed the total amount for a Crisis benefit payment. The contractor should obligate the funds necessary to resolve the crisis situation in a timely manner.

4.16 Do any of the utility vendors you work with enforce a moratorium on shut offs?

☒ Yes ☐ No

If you responded "Yes" to question 4.16, you must respond to question 4.17.

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

The utility vendors agree to accept energy benefit pledges on behalf of LIHEAP eligible customers in crisis situations facing threatened or actual interruption of services.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

Section 5 - WEATHERIZATION ASSISTANCE

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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August 1987, revised 05/92,02/95,03/96,12/98,11/01
OMB Clearance No.: 0970-0075
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LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP) MODEL PLAN SF - 424 - MANDATORY

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

Add	Household Size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	200.00%

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

5.3 If yes, 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
- ☐ Weatherize shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities).
- ☐ 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:

Some homes are weatherized using a combination of both DOE and LIHEAP funds for Incidental Repairs to maximize the effectiveness of the Energy Conservation Measures (ECMs).

Eligibility, 2605(b)(5) - Assurance 5

5.6 Do you require an assets test? ☐ Yes ☒ No

5.7 Do you have additional/differing eligibility policies for :

Renters	☒ Yes ☐ No
Renters living in subsidized housing?	☒ Yes ☐ No

5.8 Do you give priority in eligibility to:

Elderly?

	☒ Yes ☐ No
Disabled?	☒ Yes ☐ No
Young Children?	☒ Yes ☐ No
House holds with high energy burdens?	☒ Yes ☐ No
Other? High Energy Use	☒ Yes ☐ No
If you selected "Yes" for any of the options in questions 5.6, 5.7, or 5.8, you must provide further explanation of these policies in the text field below. Property Owners (landlords) must sign an agreement to not increase the rent costs for at least 12 months. Owners are encouraged to contribute financially to overall weatherization projects. The Hancock Energy Software automatically assigns a WAP ranking based on criteria set in policy. Eligible households are awarded points for children age 17 and under, elderly age 60 and older, disability, high energy burden (25% of household total income used for energy cost), and number of months on the waiting list.	
Benefit Levels	
5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household? ☐ Yes ☒ No	
5.10 If yes, what is the maximum? \$0	
Types of Assistance, 2605(c)(1), (B) & (D)	
5.11 What LIHEAP weatherization measures do you provide ? (Check all categories that apply.)	
☒ Weatherization needs assessments/audits	☒ Energy related roof repair
☒ Caulking and insulation	☒ Major appliance Repairs
☐ Storm windows	☒ Major appliance replacement
☒ Furnace/heating system modifications/ repairs	☒ Windows/sliding glass doors
☒ Furnace replacement	☒ Doors
☒ Cooling system modifications/ repairs	☒ Water Heater
☒ Water conservation measures	☒ Cooling system replacement
☒ Compact florescent light bulbs	☒ Other - Describe: Minor repairs (i.e., electrical problems, leaks, patching, thresholds, weatherstripping, switch/outlet gaskets, replace broken window panes, repair windows and doors, etc.)
If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.	

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

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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):

Presentations at community and school meetings. Off-site event for distribution (Housing conferences, seminars, churches, community centers, etc.)

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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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:

Participate in a state telephone call center (i.e. 211), which directs callers to LIHEAP providers.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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Section 8: Agency Designation, 2605(b)(6) - Assurance 6 (Required for state grantees and the Commonwealth of Puerto Rico)

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:

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

If you selected "Welfare Agency" in question 8.1, you must complete questions 8.2, 8.3, and 8.4, as applicable.

8.2 How do you provide alternate outreach and intake for HEATING ASSISTANCE?

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

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

8.5 LIHEAP Component Administration.	Heating	Cooling	Crisis	Weatherization
8.5a Who determines client eligibility?	Local County Government Community Action Agencies Tribal Government	Local County Government Community Action Agencies Tribal Government	Local County Government Community Action Agencies Tribal Government	Local County Government Community Action Agencies
8.5b Who processes benefit payments to gas and electric vendors?	State Housing Agency	State Housing Agency	State Housing Agency	
8.5c who processes benefit payments to bulk fuel vendors?	State Housing Agency	State Housing Agency	State Housing Agency	
8.5d Who performs installation of weatherization measures?				Local County Government

If any of your LIHEAP components are not centrally-administered by a state agency, you must complete questions 8.6, 8.7, 8.8, and, if applicable, 8.9.

8.6 What is your process for selecting local administering agencies?

In selecting a local agency, preference is given to any CAA or other public nonprofit entity which has, or is currently administering, an effective program under any low-income energy assistance or weatherization program.

Program effectiveness is evaluated by considering the following factors including, but not necessarily limited to:

- 1) The extent to which the past or current program achieved or is achieving LIHEAP goals in a timely fashion;
- 2) Meeting the fiscal requirements established in regulations and state policies;
- 3) The quality of service delivered by the local agency;
- 4) The number of qualifications and experience of the staff members of the agency; and
- 5) The location and proximity to the vacant territory.

Local agencies responding to a formal request for proposals are required to attend a hearing conducted by LHC to present their proposal and answer questions.

8.7 How many local administering agencies do you use? 40

8.8 Have you changed any local administering agencies in the last year?

- ☐ Yes
☒ No

8.9 If so, why?

☐

Agency was in noncompliance with grantee requirements for LIHEAP -

☐

Agency is under criminal investigation

☐

Added agency

☐

Agency closed

☐

Other - describe

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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

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

If yes, Describe.

Exceptions are allowed under circumstances when a new vendor or existing vendor is not set up to receive payment directly from LHC and/or refuses to accept a pledge on behalf of an eligible applicant. The Contractor may request reimbursement for the payment made to prevent a shut-off or disconnection. There are 89 out of 322 energy vendors that are not set up to receive payments directly from the LHC. Most of these are very small mom/pop vendors that refuse to sign a Vendor Agreement and provide other related documents. Applicants have minimal choice for utility vendors and must use the utility vendor in their location; therefore, LHC does not discriminate against an applicant whose vendor chooses not to sign. LHC is continuing to educate vendors in regards to the Vendor Agreement.

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

The Hancock Energy Software (HES) generates a Client Qualification Notification letter, which is provided to the client at the end of the application process.

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

The Vendor Agreement contains a provision to assure the vendor will not discriminate, neither in costs or goods supplied nor the services provided, against the household on whose behalf benefit payments are made.

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

The Vendor Agreement contains a provision to assure customers receiving assistance from the LIHEAP will not be treated adversely because of such assistance under applicable provision of State law and public regulatory requirements.

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, describe the measures unregulated vendors may take.

Unregulated Energy Vendors are not included as LIHEAP energy providers.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP) MODEL PLAN SF - 424 - MANDATORY																					
Section 10: Program, Fiscal Monitoring, and Audit, 2605(b)(10)																					
10.1. How do you ensure good fiscal accounting and tracking of LIHEAP funds? The LHC financial operations manual establishes the framework and procedures for budgeting, reporting, internal controls, cost allocation, and accountability as described in the costs principle applicable to the grant. Contractors submit weekly electronic copies of the Request for Payment to LHC for their benefit payments based on eligible households and monthly Request for Payment to LHC for actual administrative, program, and client education expenditures. LHC conducts monthly reconciliation of funds and expenditures with sub-recipients to ensure accuracy and reliability for data reporting. All LIHEAP expenditures are tracked and monitored using the web-based software, Hancock Energy Software (HES) and MS Excel spreadsheets.																					
Audit Process																					
10.2. Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A - 133? ☒ Yes ☐ No																					
10.3. Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited fiscal year. No Findings ☒																					
<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Finding</th> <th style="width: 15%;">Type</th> <th style="width: 30%;">Brief Summary</th> <th style="width: 20%;">Resolved?</th> <th style="width: 20%;">Action Taken</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Finding	Type	Brief Summary	Resolved?	Action Taken	1					<table border="1" style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th style="width: 15%;">Finding</th> <th style="width: 15%;">Type</th> <th style="width: 30%;">Brief Summary</th> <th style="width: 20%;">Resolved?</th> <th style="width: 20%;">Action Taken</th> </tr> </thead> <tbody> <tr> <td style="text-align: center;">1</td> <td></td> <td></td> <td></td> <td></td> </tr> </tbody> </table>	Finding	Type	Brief Summary	Resolved?	Action Taken	1				
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1																					
10.4. Audits of Local Administering Agencies What types of annual audit requirements do you have in place for local administering agencies/district offices? Select all that apply.																					
☒ Local agencies/district offices are required to have an annual audit in compliance with 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: Select all that apply																					
Grantee employees:																					
☒ Internal program review																					
☒ Departmental oversight																					
☒ Secondary review of invoices and payments																					
☒ Other program review mechanisms are in place. Describe:																					

LHC utilizes the available reporting system of the Hancock Energy Software (HES) to monitor contractor's production and service delivery to timely ensure all contractors are maintaining service delivery in accordance with contractual obligations.

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.

Louisiana Housing Corporation (LHC) has adopted a systems approach to monitoring Contractors for compliance with applicable regulations and achievement of performance goals.

Program activities are monitored both electronically and by conducting on-site visits annually. The State mandated software is used to record application input and monitor Contractor's production, i.e., how many applications are taken in a given time frame; how many of those applications were Heating /Cooling applications; how many were Crisis applications; how many households were served; and how many priority members were included in those households. We are also able to monitor the rate of benefit delivery to the specific service area. This information is utilized, to not only monitor the rate of service delivery, but also the areas being served. Those areas can be identified within a service provider's geographical service area, needing extra attention and outreach.

During the on-site monitoring visits, the physical files are reviewed for documentation of various program mandated activities, such as:

(A) Written policies and procedures that prohibit discrimination in both service delivery and employment,

(B) Compliance with Minimum Wage laws,

(C) Written policies regarding grievance procedures for both applicants and employees,

(D) Written policies regarding providing services to eligible applicants on a first come, first served basis,

(E) Written policies that document adherence to written Program Guidelines approved by Louisiana Housing Corporation,

(F) Documentation of employee training on program guidelines,

(G) A review of various documents that demonstrate program outreach activities including newspaper ads, radio and/or television advertising, copies of any printed material distributed in the community to applicants and potential applicants, social media,

(H) A review of Client Education material distributed to applicants regarding energy conservation activities,

(I) A review of a random sample of applicant files to verify the collection of required support documentation from eligible applicants, including income, vulnerability of the client for the cost of the energy bill, confirmation of residence at the service address indicated on the bill, copies of Social Security Cards or other government documents that contain social security numbers for each member of the household being served.

Eligibility and benefit determination is handled through the web-based computerized application system adopted by the LHC. The program is designed to calculate benefit based on parameters that are entered at the state level and that are unalterable at the service provider level. Benefit calculations are based on income levels for each household, the number of eligible household members, and the identification of priority members of the household, i.e., persons over 60 years of age, persons disabled, or persons under the age of 6. The benefit calculation is totally, automated requiring only data input from the agency provider. Eligibility is also determined by the same system utilizing social security numbers of applicants and flagging those applicants or household members that may have received a benefit within the prohibited timeframe. Applicants may currently apply for non-crisis benefits once in the heating season and once in the cooling season, and if necessary, applicants may also apply for a crisis benefit once in a twelve month period.

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

Site Visits:

LHC, as the state grantee, is required to conduct annual on-site compliance monitoring visits to all LIHEAP contractors.

Desk Reviews:

LHC staff conducts ongoing desk monitoring of agency reports, budget tracking and statistical reports, and rate of expenditures.

10.8. How often is each local agency monitored ?

All Contractors are monitored at least once annually.

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

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

10.11. How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues? 0

10.12. How many local agencies are currently on corrective action plans for financial accounting or administrative issues? 0

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP) MODEL PLAN SF - 424 - MANDATORY		
Section 11: Timely and Meaningful Public Participation, 2605(b)(12), 2605(C)(2)		
11.1 How did you obtain input from the public in the development of your LIHEAP plan? Select 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?		
*Revised Heating Season from 10/1 - 3/31 to 11/15 - 3/15 to correspond with Louisiana temperature patterns.		
*Increased the percentage of funds used for the Weatherization component from 12% to 15%.		
*Revised photocopied SSN card requirements for all household members.		
*Allowed SNAP printout from the last 30 days to verify SSA and SSI income.		
Public Hearings, 2605(a)(2) - For States and the Commonwealth of Puerto Rico Only		
11.3 List the date and location(s) that you held public hearing(s) on the proposed use and distribution of your LIHEAP funds?		
	Date	Event Description
1	08/07/2019	Louisiana Housing Corporation, 2415 Quail Drive, Baton Rouge, LA 70808
11.4. How many parties commented on your plan at the hearing(s)? 4		
11.5 Summarize the comments you received at the hearing(s).		
*Subgrantees requested Grantee to add specifics to the Subgrantee Agreement to state the Grantee would abide by the same new Rules of Behavior requirements which were added to ensure client confidentiality and security of PII at a local level. (Will be incorporated with FY2020 Agreements.)		
*Increased software reporting functionality for Subgrantee use. (Not related to Model Plan. New software version is being implemented this year which will allow for more reporting options.)		
*Questions regarding the timelines for reporting fraud and Subgrantee responsibilities regarding fraud investigations and policy. (Timelines are fluid depending on the situation. Each Subgrantee should have a fraud policy to determine how fraud will be handled at a local level. This will be a topic that will be expanded on in the LA LIHEAP Service & Delivery Guide this coming year with Subgrantee input.)		
*Benefit delivery issues due to requiring photocopied SSN cards for all household members, and inconsistencies between the LA LIHEAP Service & Delivery Guide allowing any government generated document containing the SSN to be substituted.		
*Inconsistencies between the Model Plan not allowing SNAP to verify income, and the LA LIHEAP Service & Delivery Guide allowing a SNAP printout dated within 30 days of the application date to verify income.		

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

*Section 17.2, 17.3, 17.4: Revised the requirement for all Household members to provide a Social Security card and aligned requirements with the LA LIHEAP Service Delivery Guide to allow any federal or state government agency issued document containing the name, SSN, and other identifying information of the individual to be used to collect the SSN. Also added exceptions for the elderly and/or disabled and children under the age of 1 who have not been issued a SSN by the SSA yet.

*Section 17.5: Added the option to use a Food Stamp (SNAP) certification letter or printout dated within 30 days of the application date to verify Social Security benefits.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

U.S. DEPARTMENT OF HEALTH AND HUMAN SERVICES
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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? None

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

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

N/A

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

In accordance with Section 2605 (b) (13) of Public Law 97-35, applicants are advised of their appeal right at the time of application.

During the application process, the rights to an appeal and fair hearing and the Civil Rights statements are written and described on the back of the service application form. The LIHEAP workers are required to read this section to the applicant, before the applicant signs to request a hearing. A copy of the form is provided to the applicant to mail to LHC to request a fair hearing within 30 days after the decision. LHC will review the request and respond in writing to the request for review. In the event the applicant is still dissatisfied, LHC will retain an Administrative Law Judge to preside at the hearing and follow applicable laws to render a decision.

12.5 When and how are applicants informed of these rights?

Ineligible applicants are informed in writing, at the time of application, of their rights to an appeal and fair hearing, prior to signing the form.

The written request with an explanation of the issue on back of the service application form under Right to Appeal and Fair Hearing should be mailed to the Louisiana Housing Corporation (LHC), 2415 Quail Drive, Baton Rouge, LA 70808. If assistance is required, the contractor may assist the applicant, if requested, to prepare a written request. The request must be received by LHC within 30 days of the decision or postmarked within 30 days.

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

In accordance with section 2605 (b) (13) of Public Law, 9735, applicants are provided information regarding a fair hearing when assistance is denied or is not acted upon with reasonable promptness. Applicants are informed in writing and orally at the time of application of his/her right to a fair hearing and the method by which a hearing may be requested.

12.7 When and how are applicants informed of these rights?

A "LIHEAP Application Required Documents Form" is completed, signed and dated by the applicant and the Agency representative, at the time of application. The form includes a checklist and information regarding the status of the application.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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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?

Energy education is provided to eligible and ineligible households. Local agencies are required to develop active, participatory energy conservation education activities. They are also encouraged to use educational activities that can be carried out while the applicant is waiting for intake. Services can include counseling, assistance with negotiations with energy vendors, outreach, referrals to the Weatherization Assistance Program, and energy efficiency education materials.

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

A percentage is set in the State Plan and the amount is obligated upon receipt of the grant award.

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

Assurance 16 funds were used to purchase energy kits, which included LED bulbs, energy calendars, energy wheels, and coloring books for children. Sub-grantees also purchased laptop computers, modems, scanners, televisions with built in DVD players, and portable printers to deliver educational videos and serve clients in rural areas who are unable to travel to an office. LED night lights, weather stripping tape, advertisement spots and materials were also purchased to educate the public about the LIHEAP program including personnel time. LHC is estimating 45,436 households will benefit from Assurance 16 funds based on preliminary numbers received from Subgrantees this year. The LHC is currently working with sub-grantees to utilize FY 2019 Client Education funds prior to the end of the 09/30/2020.

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

Assurance 16 funds were used to purchase energy kits, which included LED bulbs, energy calendars, energy wheels, and coloring books for children.

13.5 How many households applied for these services? N/A

13.6 How many households received these services? 45436

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

Section 14 - Leveraging Incentive Program ,2607A

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

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

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

Section 14:Leveraging Incentive Program, 2607(A)

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

☐ Yes ☒ No

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

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. Â§ 96.87(d)(2)(iii), describe the following:

Resource	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 LIHEAP?
1			

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

Section 15 - Training

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

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

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

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:

LHC is a member of NEADA and participates in NEADA Conferences as well as Annual DHHS LIHEAP Meetings.

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

LHC participates in the annual conference held by the Association of Community Action Partnerships of Louisiana (ACAP). T&TA is provided daily via telephone calls, conference calls and webinars. Annual onsite T&TA is also provided during the annual monitoring visits. Periodically, as needed, we will provide training in-house for new employees and others from the Community Action Agencies.

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: LHC holds bi-annual meetings with major utility vendors.
15.2 Does your training program address fraud reporting and prevention? ☒ Yes ☐ No	
If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.	

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

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

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

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

Section 16: Performance Goals and Measures, 2605(b) - Required for States Only

16.1 Describe your progress toward meeting the data collection and reporting requirements of the four required LIHEAP performance measures. Include timeframes and plans for meeting these requirements and what you believe will be accomplished in the coming federal fiscal year.

LHC has worked with APPRISE, our HES software Developer, and LHC Technical Support department to collect the required performance data. LHC sent the vendor received data to APPRISE for assistance in determining the necessary calculations in February 2019. There has been some trouble converting and matching the data received from the vendors. LHC finalized the FY18 Performance Data in June 2019, with the help of Apprise, which is the earliest it has been finalized to date. LHC is in the process of determining which Subgrantees to pilot the Hancock LIHEAP Cloud software this year which has promised improvement to Performance Measure tracking. In October 2019, we will begin requesting vendor data for FY2019 and anticipate continued improvement in data collection as we have increased Subgrantee training.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

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

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

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

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. Select all that apply.



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:

Posters, include information, as a part of advertising campaigns.

b. Describe strategies in place for advertising the above-referenced resources. Select all that apply



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.

Type of Identification Collected	Collected from Whom?					
	Applicant Only		All Adults in Household		All Household Members	
Social Security Card is photocopied and retained	☒	Required	☐	Required	☐	Required
	☐	Requested	☒	Requested	☒	Requested
Social Security Number (Without actual Card)	☐	Required	☒	Required	☒	Required
	☐	Requested	☐	Requested	☐	Requested
Government-issued identification card (i.e.: driver's license, state ID, Tribal ID, passport, etc.)	☒	Required	☐	Required	☐	Required
		Requested		Requested		Requested

	☐		☒		☐		
	Other	Applicant Only Required	Applicant Only Requested	All Adults in Household Required	All Adults in Household Requested	All Household Members Required	All Household Members Requested
1	Copy of Medicaid or Medicare card, documentation from U.S. Department of immigration and naturalization and/or INS temporary work permit.	☐	☐	☐	☐	☐	☒
b. Describe any exceptions to the above policies. A photocopy of the original Social Security Card is required for the Applicant only. Exceptions are made for any Applicant 60 years of age or older or Applicants with disabilities. Applicants who meet these exceptions (elderly and/or disabled) may substitute the photocopy of the original card with any federal or state government agency generated document containing the name, SSN, and other identifying information of the individual. All other household members must provide a SSN by either the original Social Security card or with any federal or state government agency generated document containing the name, SSN, and other identifying information of the individual. Exceptions are made for any child born within the previous twelve months of application for which the SSA has not issued a SSN yet.							
17.3 Identification Verification							
Describe what methods are used to verify the authenticity of identification documents provided by clients or household members. Select all that apply							
☒ Verify SSNs with Social Security Administration							
☐ Match SSNs with death records from Social Security Administration or state agency							
☐ Match SSNs with state eligibility/case 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 (for tribal grantees only)							
☐ Match SSN/Tribal ID number with tribal database or enrollment records (for tribal grantees only)							
☒ Other - Describe: Verified SSN with the Social Security Administration means that either an original Social Security Card is used or an original document issued by a federal or state government agency which contains the name, SSN, and other identifying information of the individual and was verified by that federal or state government agency's means (i.e. SSA data match, Social Security card) was used. Applicants are required to provide original Social Security cards. Exceptions are made for any Applicant 60 years of age or older or Applicants with disabilities. Applicants who meet these exceptions (elderly and/or disabled) may substitute the original card with any federal or state government agency generated document containing the name, SSN, and other identifying information of the individual. All other Household members without a SSN verified with the Social Security Administration cannot be included on the LIHEAP application. Exceptions are made for any child born within the previous twelve months of application for which the SSA has not issued a SSN yet.							
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? Select all that apply.							
☐ Clients sign an attestation of citizenship or legal residency							
☒ Client's 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 enrollment records/Tribal ID card							
☒ Other - Describe: Client's submission of an original document issued by a federal or state government agency with contains the name, SSN, or other identifying information of the individual and was verified by that federal or state government agency's means (i.e. SSA data match, Social Security card) is accepted as proof of legal residency.							
17.5. Income Verification							

What methods does your agency utilize to verify household income? Select all that apply.
☒ 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: Food Stamp (SNAP) certification letter or printout dated with 30 days of application date for verification of Social Security benefits.
☐ 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. Select all that apply.
☒ 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: Beginning in FY2019, LHC requires all users of the LIHEAP Hancock software to sign a Rules of Behavior form which covers confidentiality and security of client information annually.
17.7. Verifying the Authenticity
What policies are in place for verifying vendor authenticity? Select all that apply.
☒ All vendors must register with the State/Tribe.
☒ 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? Select all that apply.
☒ 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 energy 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? Select all that apply.	
☒	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
☒	Vendors are only paid once they provide a delivery receipt signed by the client
☐	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. Select all that apply.	
☒	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
Overpayment or an ineligible payment made as a result of an error by the contractor shall be corrected immediately by notifying LHC of the error. The overpayment must be absorbed by the contractor. The contractor may appeal the cost of the overpayment or ineligible payment to the LHC. Underpayment made as a result of an error by the contractor shall be corrected immediately by notifying LHC of the error. But if the payment was already made to the energy vendor, then the contractor has to pay the remaining costs. Applicants who have received an overpayment or ineligible payment as a result of their failure to provide accurate or correct information, whether intentional or non-intentional, shall have the overpayment reversed on their energy accounts through the energy vendor.	

When a contractor identifies an overpayment or ineligible payment due to applicant error, the contractor shall notify and provide support documentation to LHC. LHC will give the applicant an opportunity to dispute the finding prior to reversing the benefit through the energy vendor. The applicant shall be advised of his or her right to appeal the reversing decision to LHC.



Clients found to have committed fraud are banned from LIHEAP assistance. For how long is a household banned? a minimum of 1 year



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:

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.

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

Certification Regarding Debarment, Suspension, and Other Responsibility Matters--
Primary Covered Transactions

Instructions for Certification

- 1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.**
- 2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency's determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.**
- 3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.**
- 4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.**
- 5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.**
- 6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for**

debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled "Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," provided by the department or agency entering into this covered transaction, without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

8. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from the covered transaction, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

9. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

10. Except for transactions authorized under paragraph 6 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

Certification Regarding Debarment, Suspension, and Other Responsibility Matters--
Primary Covered Transactions

(1) The prospective primary participant certifies to the best of its knowledge and belief, that it and its principals:

(a) Are not presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded by any Federal department or agency;

(b) Have not within a three-year period preceding this proposal been convicted of or had a civil judgment rendered against them for commission of fraud or a criminal offense in connection with obtaining, attempting to obtain, or performing a public (Federal, State or local) transaction or contract under a

public transaction; violation of Federal or State antitrust statutes or commission of embezzlement, theft, forgery, bribery, falsification or destruction of records, making false statements, or receiving stolen property;

(c) Are not presently indicted for or otherwise criminally or civilly charged by a governmental entity (Federal, State or local) with commission of any of the offenses enumerated in paragraph (1)(b) of this certification; and

(d) Have not within a three-year period preceding this application/proposal had one or more public transactions (Federal, State or local) terminated for cause or default.

(2) Where the prospective primary participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion--
Lower Tier Covered Transactions

Instructions for Certification

1. By signing and submitting this proposal, the prospective lower tier participant is providing the certification set out below.
2. The certification in this clause is a material representation of fact upon which reliance was placed when this transaction was entered into. If it is later determined that the prospective lower tier participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.
3. The prospective lower tier participant shall provide immediate written notice to the person to which this proposal is submitted if at any time the prospective lower tier participant learns that its certification was erroneous when submitted or had become erroneous by reason of changed circumstances.
4. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meaning set out in the Definitions and Coverage sections of rules implementing Executive Order 12549. You may contact the person to which this proposal is submitted for assistance in obtaining a copy of those regulations.
- 5. The prospective lower tier participant agrees by submitting this proposal that, [[Page 33043]] should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended,**

declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency with which this transaction originated.

6. The prospective lower tier participant further agrees by submitting this proposal that it will include this clause titled ``Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion-Lower Tier Covered Transaction," without modification, in all lower tier covered transactions and in all solicitations for lower tier covered transactions.

7. A participant in a covered transaction may rely upon a certification of a prospective participant in a lower tier covered transaction that it is not proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, ineligible, or voluntarily excluded from covered transactions, unless it knows that the certification is erroneous. A participant may decide the method and frequency by which it determines the eligibility of its principals. Each participant may, but is not required to, check the List of Parties Excluded from Federal Procurement and Nonprocurement Programs.

8. Nothing contained in the foregoing shall be construed to require establishment of a system of records in order to render in good faith the certification required by this clause. The knowledge and information of a participant is not required to exceed that which is normally possessed by a prudent person in the ordinary course of business dealings.

9. Except for transactions authorized under paragraph 5 of these instructions, if a participant in a covered transaction knowingly enters into a lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, suspended, debarred, ineligible, or voluntarily excluded from participation in this transaction, in addition to other remedies available to the Federal Government, the department or agency with which this transaction originated may pursue available remedies, including suspension and/or debarment.

Certification Regarding Debarment, Suspension, Ineligibility an Voluntary Exclusion--Lower Tier Covered Transactions

(1) The prospective lower tier participant certifies, by submission of this proposal, that neither it nor its principals is presently debarred, suspended, proposed for debarment, declared ineligible, or voluntarily excluded from participation in this transaction by any Federal department or agency.

(2) Where the prospective lower tier participant is unable to certify to any of the statements in this certification, such prospective participant shall attach an explanation to this proposal.

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

Section 19: Certification Regarding Drug-Free Workplace Requirements

Section 19: Certification Regarding Drug-Free Workplace Requirements

This certification is required by the regulations implementing the Drug-Free Workplace Act of 1988: 45 CFR Part 76, Subpart, F. Sections 76.630(c) and (d)(2) and 76.645(a)(1) and (b) provide that a Federal agency may designate a central receipt point for STATE-WIDE AND STATE AGENCY-WIDE certifications, and for notification of criminal drug convictions. For the Department of Health and Human Services, the central pint is: Division of Grants Management and Oversight, Office of Management and Acquisition, Department of Health and Human Services, Room 517-D, 200 Independence Avenue, SW Washington, DC 20201.

Certification Regarding Drug-Free Workplace Requirements (Instructions for Certification)

- 1. By signing and/or submitting this application or grant agreement, the grantee is providing the certification set out below.**
- 2. The certification set out below is a material representation of fact upon which reliance is placed when the agency awards the grant. If it is later determined that the grantee knowingly rendered a false certification, or otherwise violates the requirements of the Drug-Free Workplace Act, the agency, in addition to any other remedies available to the Federal Government, may take action authorized under the Drug-Free Workplace Act.**
- 3. For grantees other than individuals, Alternate I applies.**
- 4. For grantees who are individuals, Alternate II applies.**
- 5. Workplaces under grants, for grantees other than individuals, need not be identified on the certification. If known, they may be identified in the grant application. If the grantee does not identify the workplaces at the time of application, or upon award, if there is no application, the grantee must keep the identity of the workplace(s) on file in its office and make the information available for Federal inspection. Failure to identify all known workplaces constitutes a violation of the grantee's drug-free workplace requirements.**
- 6. Workplace identifications must include the actual address of buildings (or parts of buildings) or other sites where work under the grant takes place. Categorical descriptions may be used (e.g., all vehicles of a mass transit authority or State highway department while in operation, State employees in each local unemployment office, performers in concert halls or radio studios).**
- 7. If the workplace identified to the agency changes during the performance of the grant, the grantee shall inform the agency of the change(s), if it previously**

identified the workplaces in question (see paragraph five).

8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

***Controlled substance* means a controlled substance in Schedules I through V of the Controlled Substances Act (21 U.S.C. 812) and as further defined by regulation (21 CFR 1308.11 through 1308.15);**

***Conviction* means a finding of guilt (including a plea of nolo contendere) or imposition of sentence, or both, by any judicial body charged with the responsibility to determine violations of the Federal or State criminal drug statutes;**

***Criminal drug statute* means a Federal or non-Federal criminal statute involving the manufacture, distribution, dispensing, use, or possession of any controlled substance;**

***Employee* means the employee of a grantee directly engaged in the performance of work under a grant, including: (i) All direct charge employees; (ii) All indirect charge employees unless their impact or involvement is insignificant to the performance of the grant; and, (iii) Temporary personnel and consultants who are directly engaged in the performance of work under the grant and who are on the grantee's payroll. This definition does not include workers not on the payroll of the grantee (e.g., volunteers, even if used to meet a matching requirement; consultants or independent contractors not on the grantee's payroll; or employees of subrecipients or subcontractors in covered workplaces).**

Certification Regarding Drug-Free Workplace Requirements

Alternate I. (Grantees Other Than Individuals)

The grantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;

(b) Establishing an ongoing drug-free awareness program to inform employees about --

(1) The dangers of drug abuse in the workplace;

(2) The grantee's policy of maintaining a drug-free workplace;

(3) Any available drug counseling, rehabilitation, and employee assistance programs; and

(4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;

c) Making it a requirement that each employee to be engaged in the performance of the grant be given a copy of the statement required by paragraph (a);

(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --

(1) Abide by the terms of the statement; and

(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;

(e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;

(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted -- (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or

(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;

(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).

(B) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

Place of Performance (Street address, city, county, state, zip code)

2415 Quail Drive

*** Address Line 1**

Address Line 2

Address Line 3

Baton Rouge

*** City**

LA

*** State**

70808

*** Zip Code**

Check if there are workplaces on file that are not identified here.

Alternate II. (Grantees Who Are Individuals)

(a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;

(b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other

designee, unless the Federal agency designates a central point for the receipt of such notices. When notice is made to such a central point, it shall include the identification number(s) of each affected grant.

[55 FR 21690, 21702, May 25, 1990]

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

Section 20: Certification Regarding Lobbying

Section 20: Certification Regarding Lobbying

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

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

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

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

Statement for Loan Guarantees and Loan Insurance

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

If any funds have been paid or will be paid to any person for influencing or attempting to influence an officer or employee of any agency, a Member of Congress, an officer or employee of Congress, or an employee of a Member of Congress in connection with this commitment providing for the United States to insure or guarantee a loan, the undersigned shall complete and submit Standard Form-LLL, "Disclosure Form to Report Lobbying," in accordance with its instructions. Submission of this statement is a prerequisite for making or entering into this transaction imposed by section 1352, title 31, U.S. Code. Any

person who fails to file the required statement shall be subject to a civil penalty of not less than \$10,000 and not more than \$100,000 for each such failure.

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

Assurances

Assurances

(1) use the funds available under this title to--

(A) conduct outreach activities and provide assistance to low income households in meeting their home energy costs, particularly those with the lowest incomes that pay a high proportion of household income for home energy, consistent with paragraph (5);

(B) intervene in energy crisis situations;

(C) provide low-cost residential weatherization and other cost-effective energy-related home repair;and

(D)plan, develop, and administer the State's program under this title including leveraging programs, and the State agrees not to use such funds for any purposes other than those specified in this title;

(2) make payments under this title only with respect to--

(A) households in which one or more individuals are receiving--

(i)assistance under the State program funded under part A of title IV of the Social Security Act;

(ii) supplemental security income payments under title XVI of the Social Security Act;

(iii) food stamps under the Food Stamp Act of 1977; or

(iv) payments under section 415, 521, 541, or 542 of title 38, United States Code, or under section 306 of the Veterans' and Survivors' Pension Improvement Act of 1978; or

(B) households with incomes which do not exceed the greater of -

(i) an amount equal to 150 percent of the poverty level for such State;
or

(ii) an amount equal to 60 percent of the State median income;

(except that a State may not exclude a household from eligibility in a fiscal year solely on the basis of household income if such income is less than 110 percent of the poverty level for such State, but the State may give priority to those households with the highest home energy costs or needs in relation to household income.

(3) conduct outreach activities designed to assure that eligible households, especially households with elderly individuals or disabled individuals, or both, and households with high home energy burdens, are made aware of the assistance available under this title, and any similar energy-related assistance available under subtitle B of title VI (relating to community services block grant program) or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;(4) coordinate its activities under this title with similar and related programs administered by the Federal Government and such State, particularly low-income energy-related programs under subtitle B of title VI (relating to community services block grant program), under the supplemental security income program, under part A of title IV of the Social Security Act, under title XX of the Social Security Act, under the low-income weatherization assistance program under title IV of the Energy Conservation and Production Act, or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;(5) provide, in a timely manner, that the highest level of assistance will be furnished to those households which have the lowest incomes and the highest energy costs or needs in relation to income, taking into account family size, except that the State may not differentiate in implementing this section between the households described in clauses 2(A) and 2(B) of this subsection;

(6) to the extent it is necessary to designate local administrative agencies in order to carry out the purposes of this title, to give special consideration, in the designation of such agencies, to any local public or private nonprofit agency which was receiving Federal funds under any low-income energy assistance program or weatherization program under the Economic Opportunity Act of 1964 or any other provision of law on the day before the date of the enactment of this Act, except that -

(A) the State shall, before giving such special consideration, determine that the agency involved meets program and fiscal requirements established by the State; and

(B) if there is no such agency because of any change in the assistance furnished to programs for economically disadvantaged persons, then the State shall give special consideration in the designation of local administrative agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds for the fiscal year preceding the fiscal year for which the determination is made;

(7) if the State chooses to pay home energy suppliers directly, establish procedures to --

(A) notify each participating household of the amount of assistance paid on its behalf;

(B) 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 made by the State under this title;

(C) assure that the home energy supplier will provide assurances that any agreement entered into with a home energy supplier under this paragraph will contain provisions to assure that no household receiving assistance under this title will be treated adversely because of such assistance under applicable provisions of State law or public regulatory requirements; and

(D) ensure that the provision of vendor payments remains at the option of the State in consultation with local grantees and may be contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households, including providing for agreements between suppliers and individuals eligible for benefits under this Act that seek to reduce home energy costs, minimize the risks of home energy crisis, and encourage regular payments by individuals receiving financial assistance for home energy costs;

(8) provide assurances that,

(A) the State will not exclude households described in clause (2)(B) of this subsection from receiving home energy assistance benefits under clause (2), and

(B) the State will treat owners and renters equitably under the program assisted under this title;

(9) provide that--

(A) the State may use for planning and administering the use of funds under this title an amount not to exceed 10 percent of the funds payable to such State under this title for a fiscal year; and

(B) the State will pay from non-Federal sources the remaining costs of planning

and administering the program assisted under this title and will not use Federal funds for such remaining cost (except for the costs of the activities described in paragraph (16));

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

(11) permit and cooperate with Federal investigations undertaken in accordance with section 2608;

(12) provide for timely and meaningful public participation in the development of the plan described in subsection (c);

(13) provide an opportunity for a fair administrative hearing to individuals whose claims for assistance under the plan described in subsection (c) are denied or are not acted upon with reasonable promptness; and

(14) cooperate with the Secretary with respect to data collecting and reporting under section 2610.

(15) * beginning in fiscal year 1992, provide, in addition to such services as may be offered by State Departments of Public Welfare at the local level, outreach and intake functions for crisis situations and heating and cooling assistance that is administered by additional State and local governmental entities or community-based organizations (such as community action agencies, area agencies on aging and not-for-profit neighborhood-based organizations), and in States where such organizations do not administer functions as of September 30, 1991, preference in awarding grants or contracts for intake services shall be provided to those agencies that administer the low-income weatherization or energy crisis intervention programs.

* This assurance is applicable only to States, and to territories whose annual regular LIHEAP allotments exceed \$200,000. Neither territories with annual allotments of \$200,000 or less nor Indian tribes/tribal organizations are subject to Assurance 15.

(16) use up to 5 percent of such funds, at its option, to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance, including needs assessments, counseling, and assistance with

energy vendors, and report to the Secretary concerning the impact of such activities on the number of households served, the level of direct benefits provided to those households, and the number of households that remain unserved.

Plan Attachments

PLAN ATTACHMENTS
The following documents must be attached to this application
• Delegation Letter is required if someone other than the Governor or Chairman Certified this Report.
• Heating component benefit matrix, if applicable
• Cooling component benefit matrix, if applicable
• Minutes, notes, or transcripts of public hearing(s).

Office of the Governor
State of Louisiana

JOHN BEL EDWARDS
GOVERNOR



P.O. Box 94004
BATON ROUGE, LOUISIANA 70804-9004
(225) 342-7015
GOV.LA.GOV

September 15, 2017

Ms. Lauren Christopher, Operations Branch Chief
DHHS, Administration for Children and Families
Office of Community Services, Division of Energy Assistance
Aerospace Building, 5th Floor West
370 L'Enfant Promenade, SW
Washington, D.C. 20047

**Re: Delegation of Authority for Administration of Low Income
Home Energy Assistance Program**

Dear Ms. Christopher:

The Louisiana Housing Corporation ("LHC") was created under Act No. 408 (the "Act") of the 2011 Regular Session of the Louisiana Legislature. The Act streamlined how the State of Louisiana administers its housing programs, including the grant from the U.S. Department of Health and Human Services for the Low Income Home Energy Assistance Program ("LIHEAP").

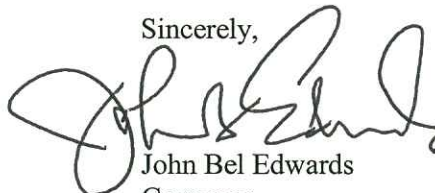
By means of this correspondence, I hereby delegate the authority to certify the LIHEAP Assurances which may be required as part of the annual LIHEAP application process to the Executive Director of the Louisiana Housing Corporation, Edselle Keith Cunningham, Jr.

This delegation shall also include the authority to review and execute any and all grant applications, contracts, and/or any other documents that may be relevant to the administration of the LIHEAP in the State of Louisiana.

This delegation of authority shall remain in full force and effect until modified or rescinded by federal or state statute or by the chief elected official of this state.

Should you have any questions, please contact Loretta Wallace, LHC Program Administrator, at 225-763-8700 or via e-mail at lwallace@lhc.la.gov.

Sincerely,



John Bel Edwards
Governor

cc: Edselle Keith Cunningham, Jr., LHC Executive Director
Loretta Wallace, LHC Program Administrator



Louisiana Housing Corporation

DATE: September 18, 2018

RE: Delegation of Signature Authority for Low Income Home Energy Assistance Program Detailed Model Plan Grant Application, the Low Income Home Energy Assistance Program Certifications, and Assurances in the DHHS On-Line Data Collection System.

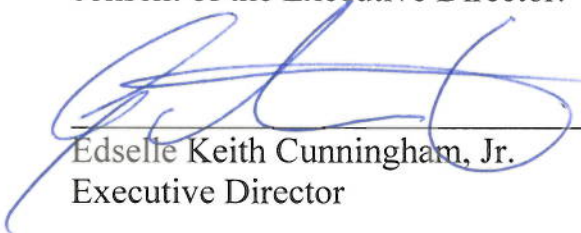
AUTHORITY

The Board of Directors of the Louisiana Housing Corporation has appointed the Executive Director as the Appointing Authority of the Corporation to administer, manage, and direct the affairs and business of the Corporation subject to the policies, control, and direction of the Board of Directors of the Corporation.

DELEGATION

The LHC administers the Low Income Home Energy Assistance Program ("LIHEAP") in Louisiana. To receive funds each year, the State must submit an application to the US Department of Health and Human Services, Administration of Children and Families. As the Executive Director of the Louisiana Housing Corporation, I hereby delegate the authority to review and execute the LIHEAP Detailed Model Plan Grant Application and the LIHEAP Certifications and Assurances in the DHHS On-Line Data Collection System to Lauren Holmes, Housing Finance Deputy Administrator.

This delegation of signature authority shall be effective as of November 01, 2017 and will remain in effect until revoked by the Executive Director or his successor. The authority delegated is not subject to sub-delegation without prior and express written consent of the Executive Director.



Edselle Keith Cunningham, Jr.
Executive Director

Heating and Cooling - Benefit Matrix

Energy Burden Percent	Group	Benefit Amount
25% and Greater	1	450.00
25% and Greater	2	450.00
25% and Greater	3	450.00
25% and Greater	4	500.00
25% and Greater	5	500.00
25% and Greater	6	500.00
25% and Greater	7	500.00
25% and Greater	8 or More	500.00
18% to 24.9%	1	350.00
18% to 24.9 %	2	350.00
18% to 24.9%	3	350.00
18% to 24.9%	4	400.00
18% to 24.9%	5	400.00
18% to 24.9%	6	400.00
18% to 24.9%	7	400.00
18% to 24.9%	8 or More	400.00
10% to 17.9%	1	250.00
10% to 17.9%	2	250.00
10% to 17.9%	3	250.00
10% to 17.9%	4	300.00
10% to 17.9%	5	300.00
10% to 17.9%	6	300.00
10% to 17.9%	7	300.00
10% to 17.9%	8 or More	300.00
9.9% and Less	1	150.00
9.9% and Less	2	150.00
9.9% and Les	3	150.00
9.9% and Less	4	200.00
9.9% and Less	5	200.00
9.9% and Less	6	200.00
9.9% and Less	7	200.00
9.9% and Less	8 or More	200.00

Additional Payment to Targeted Priority Groups

Those household that contain one or more members of the targeted priority groups shall receive an additional payment of \$100.00 Targeted priority groups are:

- ❖ Persons 60 years or older
- ❖ Persons who are disabled
- ❖ Persons five years of age and younger

Regardless of the number of priority members in one household, the household is eligible for **only one** additional **\$100** payment per household. ***The maximum benefit will not exceed \$600.00***



Louisiana Housing
Corporation

FY2020 LIHEAP State Plan Public Hearing

Wednesday, August 07, 2019

10:00 a.m.

2415 Quail Drive

Baton Rouge, LA 70809

	NAME	AFFILIATION
1	Rae Grimm-Davis	St. Mary CAA
2	Carla A. Davis	St. Mary CAA
3	Nority G. Chueni	LaSalle CAA
4	Almendra J. Franklin	St. Mary CAA
5	Jeffery Beverly	St. Mary CAA
6	Ophea Woods	CSBG State Office/LWC
7	Leatha C. Spivey	LHC
8	Shali Port	LHC
9	Budie R. McBe	LHC
10	DEBORAH Sisk	QUAD AREA
11	Jatiana Cossionini	Quad Area
12	Heather Hughes	Quad Area
13	Debrae	Quad
14	Althea	Quad
15	Carolyn Mc	ERD
16	Larry St. Amant	ACAP
17	Robert Payne	Quad CAA
18	Priscilla LeBlanc	LHC
19	Danitra Brown	CSBG State Office/LWC



Louisiana Housing
Corporation

FY2020 LIHEAP State Plan Public Hearing

Wednesday, August 07, 2019

10:00 a.m.

2415 Quail Drive

Baton Rouge, LA 70809

	NAME	AFFILIATION
20	Shamell Lavigne	City of Baton Rouge/ OSS
21	Nicole Grille	Entergy
22	Demetric Mercede	Entergy No
23	Lauren Holmes	LHC
24	Taneisha Bell	LHC
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LOUISIANA HOUSING CORPORATION
LIHEAP MEETING
Held on Wednesday, August 7, 2019
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, Louisiana

REPORTED BY: KELLY S. PERRIN, C.C.R.

COURT REPORTERS OF LOUISIANA, LLC
9522 BROOKLINE AVENUE, SUITE 217
BATON ROUGE, LOUISIANA 70809
PHONE: (225) 201-9650 * FAX: (225) 201-9651
E-MAIL: depos@courtreportersla.com

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1 APPEARANCES:
2 LAUREN HOLMES
3 BRADLEY R. SWEAZY
4 EDSSELLE KEITH CUNNINGHAM, JR.
5 ALMETRA FRANKLIN
6 DOROTHY OLIVER
7 LARRY ST. AMANT
8 HEATHER HUGHES
9 WALLACE SIBLEY
10 JEFF BEVERLY

11

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17 REPORTED BY: KELLY S. PERRIN, CCR

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1 P R O C E E D I N G S

2 MR. CUNNINGHAM:

3 We're going to go ahead and get started.
4 We had noticed a public hearing for ten
5 o'clock on the LIHEAP State Plan. So that's
6 what this meeting is. This meeting is an
7 opportunity for us to go through here,
8 understand aspects of the State plan, and how
9 they affect or impact individuals who provide
10 the services to the local communities. This
11 gives us an opportunity really to talk to you
12 about the operation of the program and get
13 your feedback.

14 So this is a public comment period. This
15 is an opportunity for us to talk about how we
16 intend to implement the LIHEAP plan in the
17 2020 year. So as we have opportunity to talk
18 about the 2020 plan and improving the LIHEAP
19 plan, we do want to make sure that we notice
20 you to this. We want to hear these comments.

21 And we want to be in a position to, if
22 necessary, based on your comments come back
23 together and have a final conversation where
24 we demonstrate any adjustments made based on
25 your comments today. So we probably, and I

1 haven't finalized this yet, it will be really
2 based on what we've talked about today, we'll
3 probably have another opportunity to come back
4 and demonstrate to you all that we've heard
5 your comments, that we've made whatever
6 changes necessary in the State plan to mark
7 those comments if we deem them necessary,
8 appropriate, or within the confines of the
9 law.

10 So not to overburden us with that, but
11 just make sure, y'all, that this is not the
12 last bite at the apple. We want to make sure
13 that we hear your comments and we consider
14 them as we move the State plan forward. So
15 I'm going to hand it to Lauren and I'll be
16 here listening. I will have to step out, but
17 I have Brad in the back. And we're actually
18 transcribing the entire meeting.

19 And so I'll have the ability to go back
20 and read it and understand the comments and
21 where those comments are coming from. So
22 please make sure, speak. Have -- we want you
23 to be heard. We want you to tell us what's
24 going on from your standpoint and make sure
25 that we keep it to the 2020 impact so we can

1 move this thing forward.

2 Any questions of me directly, y'all know
3 how to reach me. But let's make sure that we
4 use this time productively and address
5 whatever needs to be addressed in a manner
6 that lets us move this forward. Okay. So
7 thank you, guys. I'm going to pass this to
8 Lauren, step out of the room, and then I'll be
9 right back.

10 MS. HOLMES:

11 Okay. Great. Good morning.

12 (GOOD MORNING BY ALL)

13 MS. HOLMES:

14 I assume everyone in here knows who I am.
15 But for the record, I am Lauren Holmes, the
16 Program Administrator for the Energy
17 Assistance Programs, which include
18 weatherization and the LIHEAP utility
19 assistance program. We have in front of us
20 today the 2020 model plan that we will -- is
21 due to DHHS in one month.

22 Just some housekeeping items, if you have
23 come in and you have not signed our sign-in
24 sheet, please do so. We also have two
25 handouts. One is very interesting. This is

1 our performance measure. It is our 2018
2 LIHEAP snapshot.

3 I fortunately just received this
4 yesterday from our company that is contracted
5 out by DHHS to assist LIHEAP grantees called
6 prize. And if you read over this, it will
7 tell you basically the average LIHEAP income
8 for all households and then the average income
9 for our high-burden households. High burden
10 means that 25 percent of their income goes
11 toward energy needs such as heating and
12 cooling.

13 And you'll be able to see this. This
14 isn't part of our 2020 State plan, but it is
15 information that I encourage you to use this.
16 This is information that we look at when we're
17 determining our benefit matrix in the future.

18 Our benefit matrix has not changed in
19 several years. It's been a very long time
20 since it has changed, and that is the benefit
21 determined based upon the household size,
22 their income, and their energy burden.

23 So we are looking as -- we continue as a
24 state to improve on our performance measures
25 and we are looking to be able to collect this

1 type of information each year to hopefully be
2 able to rereview and improve on our benefit
3 matrix in the coming one or two years.

4 All right. The second handout you have
5 is a four-page document and it tells you some
6 of the changes that we are anticipating for
7 the 2020 year. We discussed this with our
8 policy advisory council in July. And one of
9 the things that we are proposing in 2020 is
10 altering our heating assistance timeframe.
11 Previously, it was 10/1/2019 to March 31st.

12 We are looking to change that to start
13 our heating program November 15th and end it
14 on March 15th. The reason for that is that we
15 don't really receive the DHHS allocation until
16 late October. We feel that if we can actually
17 reflect and not start the heating program 'til
18 11/15, that will actually give our
19 sub-grantees an actual date that they can tell
20 their clients that the heating program will
21 start so that it's not, we're just waiting on
22 DHHS, we're waiting on funding, we're out of
23 funding.

24 If we can actually state to the clients
25 that our heating program does not start until

1 November 15th, I think it's going to set more
2 of an expectation level to the client of when
3 we actually receive funds, and then that also
4 gives LHC about two weeks to issue contracts
5 out to the sub-grantees and to give them the
6 opportunity to perform to be able to prepare
7 for that amount coming.

8 We also have introduced this last year.
9 We had our first LIHEAP annual convention
10 conference. It was in December. And the one
11 that we have for this year is on the books for
12 November 5th and 6th is when we have our
13 vendor coalition and LIHEAP annual conference.
14 We wanted to also incorporate and have that
15 conference prior to the start of the new
16 fiscal year and new funds.

17 Other than that, the cooling assistance
18 is -- the cooling program is proposing to
19 remain the same timeframe. Prices will
20 continue as a 12-month program. And our
21 weatherization program does not start until
22 July 1 of the first year and will continue
23 into the second year of the two-year grant in
24 order to align with our DOE funding that we
25 also receive.

1 We are also proposing this year, we did
2 an evaluation of the heating and cooling days
3 in the state. And up to this point, we have
4 been -- it had been pretty close to an even
5 split between heating assistance and cooling
6 assistance on the State plans in the past.

7 Currently, what we are trying to do is we
8 are reducing our heating assistance. Last
9 year, it was 30 percent. We want to reduce
10 that to 25 percent. And in turn, that
11 5 percent that we're taking off of heating
12 assistance, we're looking to put 2.5 percent
13 of that into cooling assistance where it is a
14 greater need in the state.

15 And then the other -- I apologize. It
16 was 2 percent, yes, because last year cooling
17 was 35.5. This year, we're looking to go up
18 to 37.5, which will be a 2 percent increase in
19 cooling assistance. And then the additional
20 3 percent, we're looking to maximize our
21 weatherization allowable percentage that we
22 can take out of the LIHEAP grant and increase
23 that from 12 percent to 15 percent.

24 LIHEAP does allow you to request an
25 approval waiver to go over 15 percent. We are

1 looking to evaluate that in the coming years,
2 but we wanted to increase the program to 15
3 percent this year to see -- to give our
4 sub-grantees the opportunities to have the
5 increased production and to gradually move
6 their program forward and then also to see
7 will it reevaluate in the coming years if we
8 increase that or put in a waiver to DHHS for
9 anything higher.

10 Our Assurance 16, we increased last year
11 from 0.08 to 2.5. We still have some
12 sub-grantees that are spending their client
13 education and we have found that that has been
14 a -- definitely, it was a need that needed to
15 be incorporated into the program. We went, I
16 think about a year or two, without client
17 education.

18 There was a delay in the issuance of it.
19 And so I'm very happy to say that we have --
20 that money is out and flowing right now. And
21 in the event that we see the need to increase
22 that higher, we can go up to 5 percent in the
23 future. But this year, we're going to keep it
24 at 2.5.

25 The eligibility for the program is

1 60 percent of the State's median income. I
2 was literally released the income limits at
3 nine o'clock. DHHS released those per 2020.
4 So as soon as we can calculate those figures,
5 we will issue a LIHEAP notice like we did with
6 our weatherization program this year, and
7 which we will do going forward.

8 We will release a notice saying what the
9 income limits are for the state. So we will
10 be releasing that within probably the next two
11 weeks will be a -- we call them a LHP Notice.
12 There's an LHP Notice that will go out and
13 will state what the income limits will be for
14 the 2020 year.

15 Each client will be able to apply for one
16 of the four components once a year, except for
17 the weatherization program. Let me rephrase
18 that. Weatherization, there are different
19 eligibility requirements, but heating
20 assistance once in the year, cooling
21 assistance once in the year, and crisis
22 assistance once in the year.

23 This past year as we were making
24 programmatic changes, we did have a software
25 limitation that did not allow us to remove the

1 previous six-month requirement where a client
2 could only come in once every six months. We
3 are in the process of -- we have -- are
4 migrating our database over to the rest of the
5 Hancock software that will be the benefit side
6 of it. And we're currently using the
7 administrative invoicing end this year.

8 Next year, we're looking to pile it with
9 some agencies to test out the benefits
10 portion. That benefits portion will then
11 allow us to not have to wait for the six-month
12 timeframe that was built into the old
13 software.

14 Okay. On your Page 2, you have some
15 changes that were made to the 2020 plan. Some
16 of these were just wording changes in regards
17 to changes that took place last year and we
18 noticed were not updated in the State plan.

19 Last year, we did move to the strict
20 heating assistance heating season and cooling
21 season; where in the past, we had operated
22 what we called a noncrisis program where we
23 offered benefits not tied to heating or
24 cooling. By not tying them to the heating or
25 cooling season, it did not enable us to track

1 what we were actually spending in heating or
2 cooling assistance. And it also led us not
3 being able to report accurately to DHHS on our
4 performance measures.

5 So what we've done with a couple of these
6 first sections, Section 2.4 and Section 3.4,
7 we made changes to reflect that we no longer
8 operate a noncrisis benefit program where
9 clients receive two of those benefits in a
10 12-month period, but rather they receive one
11 benefit in the cooling season and one benefit
12 in the heating season. The eligibility, they
13 can still use their, both their heating bill
14 and their cooling bill though to determine the
15 benefit in the heating or cooling season, but
16 the benefit will only go to their heating
17 source or their cooling source in that season.

18 Section 5.5 was a wording change where we
19 had -- we went into a little bit more detail
20 about how we combine DOE and LIHEAP funds. We
21 said that in the State plan, we just combined
22 them to maximize the effectiveness. We went
23 into a little bit more detail about how we use
24 those funds for incidental repairs to maximize
25 the effectiveness of energy conservation

1 measures with our DOE units.

2 Section 5.8, we had a change with our
3 weatherization program this year in as we did
4 an analysis of our software over the year. We
5 discovered that our weatherization program was
6 actually applying some priority points to
7 items that were not actual priorities, such as
8 number of occupants. When we had those, we
9 had those removed, and they were implemented
10 with our weatherization program that just
11 started July 1 to make sure that our, what we
12 say our priorities are, are actually matching
13 what our priorities are and that the software
14 was doing the same. We have changed the
15 wording in Section 5.8 to accommodate that.

16 Section 5.9 was in regards to -- this
17 Section 5 is regarding the weatherization
18 program. There was a question as, do you have
19 a maximum LIHEAP weatherization benefit
20 expenditure per household? Previously, we had
21 said yes. The answer is actually no. Because
22 this was bought, DHHS is asking if we have a
23 maximum benefit.

24 We do not have a maximum benefit for the
25 weatherization program. We have an average

1 cost per unit for the overall total of the
2 units completed. What we were doing in
3 Section 5 and 10 is we were putting in the
4 average costs per unit as the maximum and
5 reporting that to DHHS, which was inaccurate.
6 We can spend higher than the average cost per
7 unit as long as the total number of units come
8 in below the average.

9 So there may be some homes that we spend
10 \$10,000 on. There may be some that spend
11 \$3,000. There is no maximum though.

12 Let's see, Section 5.11, this is still in
13 the weatherization component of the model
14 plan. There were some items that were not
15 checked on our model plan that we recognized
16 in our weatherization program that we were
17 actually doing and were approved in our
18 weatherization program. So we made sure that
19 we added those to the State plan this year.

20 Section 7.1, we changed the State
21 Telephone Call Center from 411 to 211. As
22 much research as I have done, I don't think
23 411 exist anymore. Somebody can tell me if
24 I'm wrong though.

25 Section 8.5A, we did not have tribal

1 government in our heating, cooling, and crisis
2 agencies that we offer -- that we contract
3 with. We had Community Action Agencies. We
4 had added last year our government offices
5 that was not -- we noticed that had been
6 missing. But we also contract with Clifton
7 Choctaw Tribe out of Rapides Parish, and so
8 we've added that in 8.5A to cover that tribe.

9 Section 9.1 is in regards to the number
10 of energy vendors that we have that are not on
11 direct payments with us and have not signed a
12 vendor agreement. While you can see on here,
13 our previously number -- our previous number
14 we reported was 30 out of 202. We have
15 increased our number of vendors. There have
16 now been some vendors that have also merged.

17 So that number, when we did an analysis
18 this year, was 322 active energy vendors. And
19 of those 322, we are still working with them,
20 89 of them to get vendor agreements and to
21 have them agree to direct deposit as opposed
22 to checks.

23 The reason with that is that also gives
24 us some type of security to ensure that they
25 are treating our clients the same fairly; that

1 they are not discriminating against them; that
2 they are applying the benefit where the
3 benefit belongs. We also -- that ACH also, if
4 we can get them to sign up to that, we realize
5 that some are smaller communities and that's
6 not possible for them right now. But in the
7 event that we are able to direct deposit, that
8 also gets benefit to the client faster.

9 Section 10.6 was also a change regarding
10 us calling the program a noncrisis program
11 versus heating and cooling assistance. And
12 Section 10 is also in regards to some of our
13 corrective action plans that we have with
14 agencies. We have to report to DHHS how many
15 agencies we have on corrective action plans
16 for fiscal matters and for eligibility
17 matters.

18 When we did a review of our 40
19 sub-grantees, we did not find that we have any
20 corrective action plans within any of our
21 agencies. Now we did have monitoring of
22 findings and issues of concern that were being
23 resolved, but there were not any corrective
24 action plans, and we're very happy to report
25 that. We have an excellent team here in this

1 state.

2 Section 13.2, it was just a wording
3 change to say that the percentages that we
4 enter into with our sub-grantees are not
5 budgeted, but they are obligated. Obligated
6 means that we are basically committing that
7 money contractually to our sub-grantees. That
8 is a wording item that helps and is more along
9 the language of DHHS in regards to obligation
10 and expenditures.

11 Section 13.3, we made some updates
12 regarding our Assurance 16 Funds. That's our
13 client education. We updated them to state
14 some of the items that we have added in, such
15 as LED nightlights and weatherstripping tape,
16 advertisement spots, some things that we are
17 allowing to be distributed as client education
18 and we wanted to make sure DHHS was aware of
19 those.

20 We also updated our numbers for the
21 estimated number of households that we are
22 anticipating will receive the client education
23 funds. We do not have final numbers right
24 now. But based upon the agencies that we were
25 able to come get some preliminary numbers

1 from, we were able to estimate that overall as
2 a state.

3 Section 15.1 is in regards to our
4 training program for not only LHC as the
5 grantee, but our sub-grantees and our vendors.
6 We changed our vendor formal training
7 conference from as needed to annually. This
8 is due to our vendor coalition that we're
9 looking to incorporate every year in
10 conjunction with our LHC annual housing
11 conference -- not housing conference; LIHEAP
12 conference. We've got two. We've got a
13 housing conference too.

14 Section 16.1, we have to report on the
15 progress as a whole the State is making with
16 our performance measures. That ties to the
17 extra little handout that you have there that
18 shows you the snapshot of the state and the
19 benefits that we're providing. We have to
20 report to DHHS our progress that we are
21 making.

22 I'm very happy to say this year that with
23 the help of our vendors and our sub-grantees,
24 we are able to report much earlier on our
25 performance measures. Our LIHEAP annual

1 conference also brought to the attention of,
2 not only LHC but our sub-grantees, some of the
3 items that we needed to ensure that we were
4 marking correctly when we took applications to
5 make sure we were filling out those
6 applications, because that information pulls
7 into our performance measures.

8 Due to that annual LIHEAP conference and
9 the help we started receiving from our
10 sub-grantees, we were able to get that
11 information to apprise a lot faster and we
12 were able to get the performance measures done
13 in June of this past year as opposed to it was
14 about October of the year before that, and we
15 anticipate that this year it will be even
16 faster and earlier.

17 Section 17 of the model plan is where we
18 have to report to DHHS about our security
19 guidelines and how we oversee fraud and report
20 and handle fraud. One of the things we added
21 into one of our measures in 17.6 was we
22 implemented this year a LIHEAP Hancock
23 software Rules of Behavior, where we require
24 now all sub-grantees that have access to the
25 LIHEAP software to sign a Rules of Behavior

1 stating that they will understand the
2 confidentiality of the information; that they
3 will not share that information; that they log
4 out.

5 I believe there's several things that
6 each user of the Hancock software has to sign
7 off and abide by. And when we go out and
8 monitor, now we will be looking for that Rules
9 of Behavior for all employees that have access
10 to the software to ensure confidentiality.
11 We're not requiring them to be sent to us, but
12 we are requiring our agencies to make sure
13 that is on site. And that's a protection, not
14 only for LHC or sub-grantees, but also for our
15 clients, primarily our clients.

16 In Section 17.8, there are in the model
17 plans check boxes for things that you can
18 state that what the agency does and doesn't do
19 as the grantee. One of the items that we did
20 not have checked previously, but we do is
21 computer databases are periodically reviewed
22 to verify accuracy and timeliness of the
23 payment made to the utility. So we can go
24 back in to review where our accounting
25 department is and where we, LHC as a whole,

1 are actually releasing payment to our vendor.
2 So we do go back and we check that. We are
3 always trying to improve. And that is one of
4 the ways that we do that.

5 We also added that we have a centralized
6 computer system database to use to track all
7 payments to our vendors, and that is our
8 Hancock software, which is also going to be --
9 we're waiting for the implementation of the
10 new one. We will do that as a pilot program
11 though just to make sure that we have a smooth
12 transition from the services. Because our
13 services section is used by so many of our
14 sub-grantee personnel, as opposed to our
15 admin, which is only used by maybe two people
16 per agency.

17 So at this time, we will open it up for
18 any comments in regards to some of these
19 changes made or changes that we didn't make
20 that we need to consider and also your
21 thoughts in regards to the changing of the
22 timeframe of the heating assistance program
23 and the changes in the allocations for heating
24 and cooling assistance and weatherization.

25 MS. FRANKLIN:

1 Thank you so much. Good morning. My
2 name is Almetra Franklin. I'm with St. Mary
3 Community Action Agency. And we're going to
4 just move from the back to the front since
5 this is the freshest with you.

6 17.6, let's talk about that event. And
7 listening to you, you said the changes
8 basically that you're expecting us at the
9 local level to make sure there's no breach of
10 confidentiality and securative client
11 information; and, annually, we have to have
12 the employees sign that for our files.

13 MS. HOLMES:

14 Yes.

15 MS. FRANKLIN:

16 So when an auditor come, he or she is
17 going to be looking for that; correct?

18 MS. HOLMES:

19 Correct.

20 MS. FRANKLIN:

21 And I guess I'm just thinking that the
22 breach might come on your end because we are
23 providing you with client information, social
24 security numbers, you know, the like.

25 MS. HOLMES:

1 Yes.

2 MS. FRANKLIN:

3 What assurance are we going to get from
4 you for our file since we are a professional
5 corporation as well to assure that on your end
6 everything is being taken to protect the
7 fidelity of the information we are providing
8 you with?

9 MS. HOLMES:

10 That's a great question. I will tell you
11 that I do come from a Section 8 background,
12 and this is something that we brought over
13 from our Section 8 program that was
14 implemented by HUD. And we, as an agency, we
15 do fill that out ourselves. Our monitoring
16 staff will have those with them when they come
17 on site. And if you want to see them, you by
18 all means have the right to ask to verify it
19 and see it and they should be able to offer
20 that to you as proof that they have the
21 ability to sign it, and they follow the exact
22 same procedures.

23 MS. FRANKLIN:

24 I'm just thinking about, and many of our
25 agencies alike, weatherization programs or

1 major programs, super circular for auditing
2 purposes, they ask that when we are in
3 partnership with another agency, we'd be able
4 to show about the fidelity of the financial
5 information and the client information we're
6 providing. And it seems like, if we're going
7 to provide you or have that available for you
8 when we get our contract, we should have
9 something attached to the contract saying that
10 this is your procedure for fidelity of
11 information for our agency, the information
12 we're providing you with.

13 MS. HOLMES:

14 So you're suggesting we put the procedure
15 or you want to see our members who have
16 actually signed it?

17 MS. FRANKLIN:

18 No, I just want a statement from you just
19 like you're requiring from us to have on file.

20 MR. CUNNINGHAM:

21 I think I understand what you're saying.
22 So our fiduciary responsibility, our ability
23 to hold that information secret and sacrosanct
24 and beyond public disclosure is a part of our
25 State responsibility.

1 MS. FRANKLIN:

2 Okay.

3 MR. CUNNINGHAM:

4 And so we have a series of networks and
5 controls that make sure that we don't publish,
6 that we don't accidentally disseminate. We
7 have a control system through our technology,
8 through our service provider.

9 What -- Brad, what's the name of the
10 State's internet service, whatever that is,
11 where we get our information; and if we
12 violate those terms, they identify our emails
13 that are violating those terms, the office of
14 technology?

15 MR. SWEAZY:

16 You're talking about OTM?

17 MR. CUNNINGHAM:

18 OTM.

19 MR. SWEAZY:

20 Uh-huh.

21 MR. CUNNINGHAM:

22 So we have procedures in place that we
23 have to follow, we are required both by state
24 law and federal law to protect the
25 information. We can determine what document

1 will put you at ease. I understand your
2 question.

3 We're going to make that requirement on
4 you. We've got to show you -- look, we making
5 you eat the cabbage, we got to show you how to
6 we eat the lettuce; right.

7 MS. FRANKLIN:

8 And I just thought, ideally, you would
9 attach it to our contract, that would be a
10 part of our official agency records. When our
11 auditor pull, we can say we provided them with
12 this information for on our behalf, but we
13 also have the same thing.

14 MR. CUNNINGHAM:

15 And, look, it may be a statement as
16 simple as from our legal counsel saying that
17 we as a state agency, we are required to
18 protect the information according to the rules
19 that we are required. We may just send you
20 something that tells you and documents what
21 our requirements are so that you can make sure
22 your partners see that we have a requirement
23 that we are honoring and we are monitoring as
24 well as you.

25 MS. FRANKLIN:

1 Thank you.

2 MS. HOLMES:

3 Yes.

4 MS. FRANKLIN:

5 One more thing.

6 MS. HOLMES:

7 Yes.

8 MS. FRANKLIN:

9 You talked about the performance
10 management snapshot, and as I look at the
11 snapshot that you gave us this morning, just
12 glancing at it, seemingly, to me, it would be
13 awfully helpful if we could get that snapshot
14 by parishes. And some kind of the way, the
15 Hancock, the system that you all have should
16 be able to aggregate that data for us and get
17 that data back to us, as we start going to our
18 governmental entities and stakeholders and
19 partners in our local community, we can show
20 the impact of the LIHEAP program on our
21 community.

22 MS. HOLMES:

23 I agree. One of the drawbacks to the
24 current Hancock system is a reporting function
25 that I have had that as an environment for

1 this new system that the reporting game has
2 got to be definitely upped a notch. So I am
3 still waiting to see what that looks like.
4 This report is produced by a third-party
5 entity that is contracted by DHHS, but they do
6 work with states individually.

7 And that's definitely something that I
8 can throw to their attention because I love
9 this format. And it's definitely helped me in
10 reviewing where we are as a program and as a
11 state. And it's possible that, from our data,
12 they can extract this information at a parish
13 level.

14 MR. CUNNINGHAM:

15 And I'm -- I promise I won't say anything
16 else. I know we came to hear you. We
17 actually have a very proficient data analysis
18 team on staff and they have actually been
19 pulling information from DHHS and putting
20 records together. So we know the people we're
21 serving, what parishes they live in, what
22 those dollar amounts are. We'll try to get
23 that to you before you leave here today.

24 MS. FRANKLIN:

25 Yeah, it will be helpful to us.

1 MR. CUNNINGHAM:

2 I think I have it in a format. The last
3 report I had may not have individualized it
4 enough. But let me see what I can get for you
5 before we leave today.

6 MS. FRANKLIN:

7 Okay.

8 MR. CUNNINGHAM:

9 I'm going to try to get you guys some of
10 that information.

11 MS. FRANKLIN:

12 Okay.

13 MR. CUNNINGHAM:

14 And at the very least, we'll make sure it
15 gets to the website. I know I have it.
16 You've just got to source it and --

17 MS. FRANKLIN:

18 And if not today, maybe you can just send
19 it to us --

20 MR. CUNNINGHAM:

21 Oh, absolutely.

22 MS. FRANKLIN:

23 -- later.

24 MR. CUNNINGHAM:

25 Absolutely.

1 MS. FRANKLIN:

2 Yeah. Okay.

3 MR. CUNNINGHAM:

4 But I'm going to see if I can get it to
5 you today. And then that way --

6 MS. FRANKLIN:

7 All right. Somebody else needs to...

8 MS. HOLMES:

9 So what I will add also about these
10 performance measures is that it's also based
11 upon the actual utility consumption and the
12 12-month utility bills from the clients that
13 we pull from the vendors. The new Hancock
14 software is going to have a field in it that
15 lets the intake worker, as they are taking
16 that client in, they can enter in that
17 information for the January through December
18 timeframe and that utility data into Hancock.
19 It's going to be able to pull reports like
20 this from our own software that we couldn't do
21 right now just because we're missing that
22 actual month by month utility data in the old
23 system.

24 MS. FRANKLIN:

25 Well, you know, just thinking, we're

1 entering the data to Hancock anyway --

2 MS. HOLMES:

3 Right.

4 MS. FRANKLIN:

5 -- it would just be a separate field for
6 us --

7 MS. HOLMES:

8 Yes, it would probably take two minutes.

9 MS. FRANKLIN:

10 All of our reports are computer driven
11 anyway.

12 MS. HOLMES:

13 Uh-huh. Yeah, that's a great idea. We
14 can definitely do that.

15 MS. OLIVER:

16 Good morning. I'm Dorothy Oliver with
17 LaSalle Community Action. And although this
18 is not one section that you are referring to
19 in the changes, under 17.10, Investigations
20 and Prosecutions, can you give me an idea of
21 those not stated in here what's the timeframe
22 that we are to report a perceived instance of
23 fraud that that fraud will be investigated?

24 MS. HOLMES:

25 The fraud -- LHC investigating that

1 fraud?

2 MS. OLIVER:

3 Yes. Because it's my understanding that
4 we -- it starts with the intake worker. It
5 comes to me.

6 MS. HOLMES:

7 Right.

8 MS. OLIVER:

9 And then I send it to you.

10 MS. HOLMES:

11 Uh-huh.

12 MS. OLIVER:

13 What's the timeframe for an investigation
14 or is this done during a monitoring visit?

15 MS. HOLMES:

16 It is -- no, it's not done during the
17 monitoring visit. When the fraud occurs, it
18 will be investigated at that time. The first
19 level -- and I apologize, I will have to go
20 back and read this section. But the first
21 level should be, let's say that the fraud is
22 determined at the agency level.

23 MS. OLIVER:

24 Uh-huh.

25 MS. HOLMES:

1 It is up to the Executive Director to
2 report to LHC the case of the fraud, but it
3 should also be in your policies how you will
4 deal with the fraud. Okay. So it's not
5 necessarily just LHC performing the
6 investigation, but it is also us working as a
7 partnership.

8 MS. OLIVER:

9 So you're saying we should enact an
10 internal fraud procedure and have it in
11 writing?

12 MS. HOLMES:

13 Yes.

14 MS. OLIVER:

15 So that when the monitor comes, I can
16 actually show what I'm doing on my level.

17 MS. HOLMES:

18 Yes. Yes.

19 MS. OLIVER:

20 Okay. And does that policy -- and just
21 as we have an internal policy as we've
22 submitted to you showing you the changes we're
23 doing on a local level, should that policy be
24 sent to you to make sure that it's legal?

25 MS. HOLMES:

1 That would be awesome, because then we
2 can -- we can review it prior to and we can
3 work with you prior to a monitoring in case
4 you do any changes to it, then we can review
5 it beforehand. And we can make sure, if
6 there's any suggestions we have per update, we
7 can do that prior to the monitoring.

8 MS. OLIVER:

9 Thank you.

10 MR. ST. AMANT:

11 Good morning. Larry St. Amant with ACAP.
12 I just want to be clear. Beyond requiring
13 agencies to have a policy regarding fraud,
14 does LHC have a policy regarding fraud that
15 says that instances such as those must be
16 identified and reported in some particular
17 manner over some particular period of time? I
18 just...

19 MS. HOLMES:

20 Yes. We also have as a --

21 MS. OLIVER:

22 It's 17.10, but there's no particular
23 time outline here.

24 MS. HOLMES:

25 Yeah.

1 MR. ST. AMANT:

2 So if there's no time there, you're
3 simply going to leave it to the agencies to
4 determine their own individual policies?

5 MS. HOLMES:

6 I am going to have to backtrack to the
7 LIHEAP User Guide because I believe it is
8 spelled out in our User Guide. I do not have
9 that in front of me and I might rely on my
10 team in the back to tell me right off the top
11 of their heads. It's not something I can tell
12 you off the top of my head. But we will
13 definitely look into it and I can respond back
14 to everyone.

15 If you included your email address, I can
16 include everyone on that and get more detail.
17 But I thought -- if it's not in this State
18 plan, it's in our User Guide. And I'm going
19 to backtrack. If it's not -- the User Guide
20 is also in an update phase. We're looking to
21 have that completed by June 30th of this year.
22 We are going to be issuing our Chapter 1 on
23 a -- we're currently doing it with our
24 weatherization guide.

25 MS. FRANKLIN:

1 Not June 30th of this year, darling;
2 right?

3 MS. HOLMES:

4 No, June 30th of -- no. You missed it.
5 No, June 30th of next year. Because right
6 now, we're updating our weatherization guide
7 on a chapter by chapter basis and we're
8 issuing it in draft form out to all entities
9 that have some type of involvement in
10 weatherization.

11 And we're taking those comments back on a
12 chapter by chapter basis. The goal for the
13 weatherization guide is the end of January
14 31st. So my goal for LIHEAP, which will be
15 starting to be integrated at the same time,
16 the goal for completion of that is June 30th
17 of next year.

18 MR. SWEAZY:

19 So the bottom line is you guys are
20 expected to have some minimum standard that
21 you --

22 MS. HOLMES:

23 Yes. We report and investigate all cases
24 of fraud that are reported to us.

25 MR. CUNNINGHAM:

1 Look, I just want to make sure everybody
2 understands, the State has a high level of
3 responsibility. So all of these issues that
4 we're bringing down based on the regulations
5 and the rules and the operation of the program
6 are responsibilities we as a entity that
7 receive the dollars already have. And so our
8 ability to establish for you all of our fraud
9 policies, all those things, they're in books,
10 they're here. We can make sure you get them
11 so you can understand them.

12 I want to make sure that we -- I don't
13 want to go too far left or right. I want to
14 do what works. So what you're telling me,
15 what I heard was you don't want to be unfairly
16 placed in a position to evaluate and
17 understand what fraud is based on timelines
18 and deadlines that are not clearly identified.

19 MS. OLIVER:

20 Correct. Right.

21 MR. CUNNINGHAM:

22 That's what I heard.

23 MS. OLIVER:

24 I want to do what's legal.

25 MR. CUNNINGHAM:

1 Right. Right. And we do too. But I
2 also want to do what's reasonable.

3 MS. OLIVER:

4 Yes.

5 MR. CUNNINGHAM:

6 And so we can find between that bound of
7 what is legal and what is reasonable and we
8 will accomplish that task. And so it's
9 depending on the type of program you're going
10 to depend on, the number of your operation.
11 There are kind of different variables I can
12 invent for you, but I like to use the old
13 reasonable man test.

14 MS. OLIVER:

15 Yeah. Uh-huh.

16 MR. CUNNINGHAM:

17 Our ability to understand our problems
18 and diagnose and fix them is about being
19 reasonable and communicating quickly when we
20 discover something. And, you know, we've had
21 history here and so there's always a concern.
22 And so we want to make sure that we give you
23 guys the best opportunity to perform your
24 jobs.

25 MS. OLIVER:

1 You've got some (indiscernible) that are

2 --

3 (MULTIPLE SPEAKERS SPEAKING)

4 MR. CUNNINGHAM:

5 Don't I know it.

6 MS. HOLMES:

7 I think this is also a great opportunity
8 and this should probably be a session that we
9 look at incorporating for the November
10 conference. I think that this is definitely
11 all LIHEAP employees that attend that
12 conference. And I think at the last one, we
13 had about 150 individuals show up. I think
14 that would be a great topic for us to discuss
15 and make sure that everything is very clear as
16 far as timelines to report, not only, you
17 know, talking about LHC and upper level of
18 sub-grantees, but talking about if I'm an
19 intake worker and I discover something, what
20 is my procedure and who should I report that
21 to?

22 MS. FRANKLIN:

23 And the -- just to kind of cap that,
24 we're not an investigating unit.

25 MR. CUNNINGHAM:

1 Right.

2 MS. HOLMES:

3 Right.

4 MS. FRANKLIN:

5 When they sign their name certifying the
6 information --

7 MS. HOLMES:

8 Right.

9 MS. FRANKLIN:

10 -- they give us is true, we may ask those
11 questions in a case management point. But, I
12 mean, the answers they give us, that's what we
13 take.

14 MS. HOLMES:

15 Right.

16 MS. FRANKLIN:

17 So I just don't want us to get into the
18 problem where, you know, I'm Sherlock
19 Holmes --

20 MS. HOLMES:

21 No.

22 MS. FRANKLIN:

23 -- and I got to be going --

24 MR. CUNNINGHAM:

25 No.

1 MS. FRANKLIN:

2 -- and verifying stuff.

3 MS. HOLMES:

4 No. And I said also, some of that is
5 not -- we also brought that up to the higher
6 level. If it's something outside of our
7 jurisdiction, we will refer things to the
8 Attorney General's office or to the Office of
9 Inspector General.

10 MR. CUNNINGHAM:

11 Every time.

12 MS. FRANKLIN:

13 Uh-huh.

14 MR. CUNNINGHAM:

15 We do. That's our approach. We're not
16 an investigative arm.

17 MS. HOLMES:

18 Right.

19 MR. CUNNINGHAM:

20 We do not have that authority to issue
21 warrants and search and serve.

22 MS. HOLMES:

23 Right.

24 MR. CUNNINGHAM:

25 So we require our partners, AG's office,

1 and the Inspector General and others. So I
2 want y'all to see, we're making this an even
3 concept and I want you guys to feel
4 comfortable in the approach.

5 But I'm saying, that stated, you know,
6 I'm probably held worse than everybody in this
7 room to what they expect from us. I just want
8 to make sure that we give you guys the ability
9 to deliver what we expect from you.

10 So, no, I'm not asking you to investigate
11 fraud. I'm not asking you to develop that
12 talent. What I'm asking you is to help us
13 understand what we believe has occurred so
14 that we can properly identify it and promote
15 it.

16 And we'll follow the rules of that
17 program. We'll follow the guidelines and meet
18 that necessary component, but I don't want you
19 guys to have to -- you don't have to hire a
20 private eye. We are going to figure this out.

21 MS. OLIVER:

22 Yeah.

23 MS. HOLMES:

24 Now, of course, and I think this issue
25 did come up this year, and this would be

1 something we could go in more depth about at
2 our November conference but, you know, client
3 fraud is a different thing also than employee
4 fraud.

5 MS. OLIVER:

6 Yeah.

7 MS. HOLMES:

8 And if you have an occurrence of employee
9 fraud, how you deal with your employee is also
10 --

11 MS. OLIVER:

12 Oh, yes.

13 MS. HOLMES:

14 Yeah, so --

15 MS. FRANKLIN:

16 Yeah, we know how to handle that.

17 MS. HOLMES:

18 I know you do. So this incorporates,
19 like, all aspects. In the same event, if LHC
20 had employee fraud, we will deal with it.

21 Yes, ma'am?

22 MS. HUGHES:

23 Hi, Heather Hughes with Quad Area,
24 program director. I have three little things.

25 MS. HOLMES:

1 Okay.

2 MS. HUGHES:

3 In the State plan on Page -- wait. No.
4 What is it? On Page 33, Section 17.2A, it
5 says that one of the types of identification
6 collected are only photocopied social security
7 cards for all household members.

8 MS. HOLMES:

9 Now this was a section that, based on
10 comments that you made last year, we did -- we
11 made this change. So it should say that,
12 yes --

13 MS. HUGHES:

14 Well, that was for ID cards.

15 MS. HOLMES:

16 Yes. Social security cards are still
17 required for all household members. And the
18 reason why is duplication of benefits.

19 MS. HUGHES:

20 But --

21 MS. HOLMES:

22 Uh-huh.

23 MS. HUGHES:

24 -- in the manual on Page 41 on the
25 service and delivery guide, it says, any

1 government-generated document containing the
2 social security number of household members
3 may be substituted for the social security
4 card.

5 MS. HOLMES:

6 We have not because we have not updated
7 the LIHEAP guide. That is probably something
8 that I need to address in a memorandum or a
9 notice. So I will hit that in a memorandum or
10 notice prior to the LIHEAP.

11 MR. CUNNINGHAM:

12 Let me answer that question in a
13 different way, please. What she said is a
14 hundred percent correct. I've been made aware
15 of this concern. And, look, across the board,
16 we are actually meeting with a governor's
17 group now that talks about how we duplicate
18 the requirements across the program. That's
19 one reason why you see a representative from
20 LWC here. We know most of you guys operate
21 CSBG; right?

22 MS. OLIVER:

23 Uh-huh. Right.

24 MR. CUNNINGHAM:

25 And so what we're trying to do is figure

1 out how we can do all of that combined, how we
2 can do that simply and have one level of
3 review, one person coming out there bugging
4 you and poking you. Now to your point, what I
5 want to understand is what that federal rule
6 requirement is first; right. And I haven't
7 done the research and I'm not the lawyer
8 anymore, but I can still do it.

9 So what I want to understand is the basic
10 component of what the federal requirement is.
11 And if there's a way we can make that work for
12 what we do, look, they make federal rules for
13 New York and California. Sometimes they don't
14 apply here though in little old Louisiana.
15 And what we want to understand is how can we
16 make these rules work for us. So I heard that
17 concern.

18 There is some conversation about how can
19 we effectively do this and the timeline in
20 which I tell -- and I'm just saying this, this
21 isn't an ageism statement. A 70-year-old
22 having to get another social security card in
23 order to get their light bill paid, knowing
24 how that system works because they had to get
25 one, I'm concerned that that person's light

1 bill is going to be off by the time he gets
2 that card.

3 MS. HOLMES:

4 Now, also in the 13 --

5 MR. CUNNINGHAM:

6 So I'm just --

7 MS. HUGHES:

8 In the 17.3, Page 34 of the State plan,
9 it says that we can verify the social security
10 number with the Social Security
11 Administration. What is that defining? Is
12 that just --

13 MS. HOLMES:

14 You know what, I'm also going to throw
15 this out here and I'm glad we're talking about
16 this because this is just -- what we probably
17 will do, and I will issue this in the next 30
18 days, we were going to issue a memorandum. We
19 will do -- I will tell you that the Section 8
20 Program, if there are children under the age
21 of six, they are -- let's go back to the
22 Section 8 requirements and see if we can
23 piggyback on that.

24 I know that we can give -- the Section 8
25 Program gives a timeline where if somebody

1 hasn't been issued a social security card,
2 like that two-month old, that there is some
3 exceptions to that. So we can build some
4 exceptions into this, and then we can also
5 look at if we're talking about a 70-year-old
6 and we can document the -- there are also
7 some -- Section 8 also makes some exceptions
8 for individuals that, you know, they didn't
9 have birth certificates and it was written in
10 the Bible and things like that. There are
11 some exceptions to that.

12 Let's see what we can do about that.
13 We'll issue it for a draft. We'll let
14 everybody take a look at it and then we'll see
15 if that incorporates and hits all of the
16 problems if we can add some exceptions into
17 it.

18 MS. HUGHES:

19 I mean, because if it has to be verified
20 with the Social Security Administration, with
21 a letter from the Social Security
22 Administration with their social security
23 number on the top of the page, because there's
24 a code behind that social security number. So
25 if it's a, you know, the (indiscernible) or HI

1 individual, so we know the code to know, like
2 if it's B, it's not their social security
3 number. Would we be able to use that?

4 MS. HOLMES:

5 Well, let's do this. Can I call you in
6 the next two weeks or so while we're
7 developing this and talk it out and see --

8 MR. SWEAZY:

9 Yeah. And we don't have to solve it
10 today. I mean, we can work this out.

11 MS. HOLMES:

12 Right.

13 MS. HUGHES:

14 Yes.

15 MR. SWEAZY:

16 But I want to make sure that we do
17 address it.

18 MS. HUGHES:

19 I mean, as of today, we're still working
20 off of our 2014 handle.

21 MS. HOLMES:

22 Yeah.

23 MS. HUGHES:

24 So I can use those documents. I can use
25 the food stamp printout. I can use any

1 state-generated document as of now. Just when
2 a new manual comes out, am I correct?

3 MS. HOLMES:

4 Wait. Say that one more time for me.

5 MS. HUGHES:

6 Because I can use -- I'm using the
7 existing manual to run the program; correct?

8 MS. HOLMES:

9 Yes.

10 MS. HUGHES:

11 So I can use any government-generated
12 document containing the social security
13 number --

14 MS. HOLMES:

15 Yes.

16 MS. HUGHES:

17 -- of the household.

18 MS. HOLMES:

19 Well --

20 MS. HUGHES:

21 It's in the -- it's in the manual.

22 MS. HOLMES:

23 So the State plan though overrides the
24 manual at --

25 MS. HUGHES:

1 Yes.

2 MS. HOLMES:

3 The State plan overrides the manual.

4 MS. HUGHES:

5 So we cannot --

6 MS. HOLMES:

7 Any memorandum that comes out will also
8 state whether or not it overrides and
9 substitutes the manual. So State plan will
10 always overgovern the LIHEAP manual.

11 So if we make changes to the State plan,
12 it will -- you will have to abide by the State
13 plan as opposed to the --

14 MS. HUGHES:

15 And that wording probably needs to be
16 included in the new manual because it's not in
17 the old manual.

18 MS. HOLMES:

19 Yeah. Okay.

20 MS. HUGHES:

21 Just for future, you know, reference.

22 MS. HOLMES:

23 Okay.

24 MS. HUGHES:

25 Also, the State plan does not allow

1 agencies to use a snap printout from the last
2 30 days to verify income for like social -- I
3 understand for, you know, income, working
4 income. But for social security, SSI, SSA,
5 that amount is on their snap printout. Can
6 we -- it's in the manual that we can use it;
7 can we? But it's not documented in the State
8 plan that we can.

9 MR. CUNNINGHAM:

10 So, look, we're at the point now where we
11 can -- let's understand this. I don't want to
12 tell you anything that we can't accomplish --

13 MS. HUGHES:

14 Okay.

15 MR. CUNNINGHAM:

16 -- and I don't want to hold you to a
17 standard that's unnecessary. What I want to
18 do is I want to do that final research noting
19 that this is an issue and noting that we'll be
20 able to come back and --

21 MS. OLIVER:

22 Right, come back.

23 MS. HOLMES:

24 Right. But it's -- if this is something
25 I need to incorporate in the State plan, I've

1 got to understand it.

2 MS. HUGHES:

3 Yeah.

4 MR. CUNNINGHAM:

5 So this is my second point of it, I
6 believe all of you have very valuable
7 information. I believe all of you have great
8 know how, right. And so as we move this
9 process forward, Lauren, Brad, I want you guys
10 involved. So if we have not set the followup
11 meeting to this conversation so we can talk
12 about some of these things in detail and glean
13 some of your understanding, set it. It's got
14 to happen.

15 I know y'all consult in the development
16 of the State plan otherwise, but I want to
17 address these issues. And so let's just make
18 sure we have a way to put these together so we
19 can have something that we can formally go
20 through and say, okay, where are we on this?
21 Because I want your input, but I also want you
22 guys to recognize that we're trying to monitor
23 this program for the state and so I want to
24 make sure we do it correctly because I can't
25 owe the federal government any more money.

1 Ask Gillis and ask Willie Rack.

2 And so but we want to make sure we do it
3 right, but I want to make sure I hear you. So
4 this objective is just about hearing and
5 making sure we understand what the issue is so
6 we can define the correct rule and disseminate
7 the information to you all together. I think
8 that's reasonable.

9 Ms. Almetra?

10 MS. FRANKLIN:

11 Yeah, I just, I know our time is almost
12 up for LIHEAP and we have to go into CSBG, but
13 I did want us to spend some time talking
14 about, in the absence of the State plan,
15 talking about payments and things like that.
16 So are we going to talk about that after this?

17 MS. HOLMES:

18 Yes, ma'am.

19 MS. FRANKLIN:

20 All right.

21 MS. HOLMES:

22 Definitely.

23 Okay. Heather, did you have a third one
24 though?

25 MS. HUGHES:

1 Well, and it might not be State plan
2 related. But in the new cloud invoicing, just
3 the invoicing part that we have, and I think
4 I've emailed Bridget and --

5 MS. HOLMES:

6 Okay. Let's --

7 MS. HUGHES:

8 Table it?

9 MS. HOLMES:

10 Yeah. Yeah. Yeah, definitely.

11 MR. SIBLEY:

12 Hello. Wallace Sibley from Quad Area
13 seeing as the State plan is crucial, my
14 thought for the record would be, going
15 forward, I know this -- Ms. Dorothy over
16 there, Ms. Almetra know ten times more than I
17 know and a lot of people in the room know more
18 than I know. In alignment with what Keith
19 said, having some scheduled meetings where we
20 can input on the State plan and on the main
21 one and even going forward, because there's a
22 lot of things that we can't talk about in 30
23 minutes.

24 And the State plan is like the
25 constitution, it's a big deal. And there's a

1 lot of details in there that we have questions
2 about, how it's going to be implemented, how
3 it's going to be interpreted, blah, blah,
4 blah.

5 And so, for the record, I would like to
6 have input on that officially and I would like
7 anybody to, at least Ms. Almetra and Ms.
8 Dorothy, and not to clog up the meetings with
9 a ton of people, but at least some people who
10 are very wise in that department, along with
11 my team to be able to participate in those
12 conversations and the manual and the
13 interpretation of the manual because all this
14 affects -- this and on the ground -- I mean,
15 look, on the ground, all these translate to
16 helping people.

17 When you talk about, for instance,
18 getting a social security card for everybody,
19 that sounds great on paper. All right. But
20 if you look at an 86-year-old and say, you've
21 got to have seven social security cards or I
22 can't help you and walk out the front door,
23 that's bad. And it's very difficult to spend
24 the money if we don't come to these
25 conclusions together.

1 Rules are great. But if they don't work,
2 they're not great. So I suggest that we work
3 on it together.

4 MS. FRANKLIN:

5 When is the State plan due?

6 MR. SIBLEY:

7 September 3rd.

8 MS. FRANKLIN:

9 Oh, okay. So we've got --

10 MR. SIBLEY:

11 So we have a month, but we need to get
12 with it.

13 MR. CUNNINGHAM:

14 So I'm hearing that we've got people
15 ready to work on this. If there are some
16 challenges, I'm hearing that we've got people
17 who want to assist us in getting this done.
18 That's the only way we're going to get it
19 done. That's the only way we're going to get
20 at least everybody mad or everybody satisfied.
21 But either way, that's where we are.

22 MR. SWEAZY:

23 Well, let's make sure we meet the
24 requirements of our State plan process too.
25 Everything that is being said is documented

1 and captured. But everything also, there
2 should be -- everyone should point it out in
3 writing, I would like for us to at least --
4 CSBG will (indiscernible) -- I'd like for us
5 to at least hear the points that we have
6 concerns with and then allow us at the next
7 meeting or even before the next meeting that
8 we give a response or a solution to each
9 point.

10 And so I think we need to hear each
11 point. And we don't have to solve it or
12 debate it or anything. You can say, I have an
13 issue with this because -- and I think we need
14 to stay focused on the State plan. Because,
15 ultimately, that's the -- it goes down to the
16 manual. And then if we can get the State plan
17 right, then we can get the manual right.

18 So let's hit every point, every concern.
19 And we don't have to say what we can do, how
20 we can do it, let's don't worry about that.
21 Let's get the points, what the issue is, and
22 allow us then to work out a solution or
23 provide a solution. And then we meet next
24 week or the week after and then you can say, I
25 don't like that or we do like that.

1 But that way, when we have the next
2 public meeting about, this is our final, then
3 we can go into more hashing out if we don't
4 like it. At least this way, it allows us to
5 take steps to get to it and each concern.

6 So just one more point, let's hear
7 everyone's concern and then let's make sure
8 that everything is considered and is put down
9 in writing because that will be delivered as
10 part of the State plan. So that way, your
11 concerns and your comments are all public
12 record.

13 MR. BEVERLY:

14 Yes, Jeff Beverly, St. Mary Community
15 Action. And I just want to make one comment
16 on the five points we had talked about looking
17 into being able to use DOE funds and DHHS
18 funds to eliminate as many deferrals as
19 possible.

20 We have a number of deferrals that's
21 coming in. We had to borrow -- we're trying
22 to keep our ACPU. But to be able to use both
23 of those funds to do a unit would really
24 reduce our deferrals. Just, like, if we could
25 just look into that one more time?

1 MS. HOLMES:

2 Oh, that's still on the table for the
3 weatherization program. That detail isn't
4 really -- doesn't go into depth right here
5 because we don't have the policy yet, but
6 that's something that we're continuing to talk
7 about on our quarterly weatherization
8 management calls. I think we have one in May.
9 We have one in August.

10 So this is something, this is one of
11 those topics that we're kind of still
12 addressing. So we can vet out because DHHS
13 does -- there are one or two items that they
14 have some type of legal guidance on in regards
15 to roof repair versus anything that's
16 considered -- crosses that substantial rehab
17 threshold, we can't incorporate.

18 So what we really need to be working on
19 with our weatherization team members is
20 defining what this state's policy is going to
21 be in regards to what is a minor repair, what
22 is a non-substantial rehab repair. So is that
23 the square -- is that a square foot patch
24 that's 2 feet by 3 feet? You know, the
25 technical type end of it, so that is

1 definitely all is still on our horizon and in
2 our discussion with all our weatherization
3 team members.

4 Thanks, Jeff. Anyone else?

5 All right. Well, thank you for coming.
6 We really appreciate it. And we are, at this
7 point, going to close out our LIHEAP Public
8 Hearing.

9 (WHEREUPON, THE MEETING ADJOURNED.)

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1 R E P O R T E R ' S C E R T I F I C A T E

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