DETAILED MODEL PLAN (LIHEAP)

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: 06/30/2017

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:** State of Vermont

*** b. Employer/Taxpayer Identification Number (EIN/TIN):** 1-036000264-D4	*** c. Organizational DUNS:** 809376155

*** d. Address:**

*** Street 1:**	280 State Drive	**Street 2:**	HC 1 South
*** City:**	Waterbury	**County:**	
*** State:**	VT	**Province:**	
*** Country:**	United States	*** Zip / Postal Code:**	05671-1020

e. Organizational Unit:

Department Name: Children and Families	**Division Name:** Economic Services Division

f. Name and contact information of person to be contacted on matters involving this application:

Prefix: Mr.	*** First Name:** Robert	**Middle Name:** James	*** Last Name:** Arnell
Suffix:	**Title:** Policy Analyst	**Organizational Affiliation:** n/a	
*** Telephone Number:** (802) 557-1251	**Fax Number** 802-769-2186	*** Email:** bobby.arnell@vermont.gov	

*** 8a. TYPE OF APPLICANT:**
A: State Government

b. Additional Description:
VT Agency of Human Services, Dept for Children & Families, Economic Services Division

*** 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
LIHEAP Fuel Assistance and Weatherization

12. Areas Affected by Funding:
Client grants and operation of the Vermont Fuel Assistance and Weatherization Programs

13. CONGRESSIONAL DISTRICTS OF:	
* a. Applicant 01	b. Program/Project: State of Vermont
Attach an additional list of Program/Project Congressional Districts if needed. Vermont has a Single Congressional District	

14. FUNDING PERIOD:		15. ESTIMATED FUNDING:	
a. Start Date: 10/01/2015	b. End Date: 09/30/2016	* 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	18c. Telephone (area code, number and extension)
	18d. Email Address
18b. Signature of Authorized Certifying Official	18e. Date Report Submitted (Month, Day, Year)

Attach supporting documents as specified in agency instructions.

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Department of Health and Human Services
Administration for Children and Families
Office of Community Services
Washington, DC 20447

August 1987, revised 05/92, 02/95, 03/96, 12/98, 11/01
OMB Approval No. 0970-0075
Expiration Date: 02/28/2005

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	10/01/2015	09/30/2016
☐	Cooling assistance		
☑	Crisis assistance	11/30/2015	04/29/2016
☑	Weatherization assistance	10/1/2015	09/30/2016

Provide further explanation for the dates of operation, if necessary

During FFY2016 and FFY2017 the state of Vermont will undertake an information technology (IT) project: *Fuel Payment Restructuring*. When implemented in October 2016 winter heat benefits (Seasonal Fuel Assistance) will be issued on a client's EBT benefit card. The EBT card system will only allow winter heat benefits to be negotiated for a fuel purchase with a fuel supplier certified by the Fuel Assistance Program. The design, development and implementation costs of this IT project are estimated to be about $500,000. Vermont defines the design, development and implementation of this specific IT project as being a block grant "program" expenditure. LIHEAP block grant "program" funds will be utilized to cover the *Fuel Payment Restructuring* project's costs. By comparison the IT activities of operational costs, routine maintenance, licensing fees, transaction fees, etc. of an established payment system are defined as "administrative" expenditures.

Applications for heating assistance are processed year-round by the State DCF Econonomic Services Division (ESD). Aplications for winter crisis assistance are processed by Vermont's five community action agencies under grant agreements with ESD beginning the last Monday in November to and including the last business day in April, or until funds are exhausted.

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	55.62%
Cooling assistance	0.00%
Crisis assistance	16.30%

Weatherization assistance	15.00%
Carryover to the following federal fiscal year	2.00%
Administrative and planning costs	10.00%
Services to reduce home energy needs including needs assessment (Assurance 16)	1.00%
Used to develop and implement leveraging activities	0.08%
TOTAL	100.00%

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

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

☐	Heating assistance	☐	Cooling assistance
☐	Weatherization assistance	☑	Other (specify:) Crisis assistance until the last business day in April. After April any remaining funds are reprogrammed for Carryover

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: $21.00

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?

Eligibility determination for LIHEAP heating assistance and SNAP benefits (called 3SqsVT in Vermont) is determined by the Economic Services Division (ESD). SNAP clients are required to complete a "shelter expense statement" that identifies for SNAP and LIHEAP the heat and utilities that they a) must pay for, and b) that are included in their monthly housing rental payment. Households where 'the heat is included in the rent' are deemed by state statute and by department rules to "make undesignated payment for energy for heat in the form of rent." These households are deemed to have the lowest energy burden, regardless of income, and are granted the lowest LIHEAP heating assistance benefit of $21.

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** **Some "Ameri-Corp Program payments for living allowances, earning, and in-kind aid" are counted as income and some are not.**

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.

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Section 2 - Heating Assistance

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

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

Add	Household size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	150.00%

2.2 Do you have additional eligibility requirements for HEATING ASSITANCE?	(•) 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? Residency requirement	(•) Yes ( ) No

Explanations of policies for each "yes" checked above:

Applicants must occupy a living unit or separate living quarters in Vermont, as their primaryresidence, and intend to occupy that living unit or separate living quarters or another living unit orseparate living quarters in Vermont indefinitely in order to be eligible for fuel assistance, withthe following exception: migrant workers will be determined eligible for fuel assistance if theymeet all other applicable eligibility requirements. The standard for primary residence is the fuelhouseholds or roomer fuel households occupation (or, for new Vermont residents, the householdsintent to occupy) of a living unit or separate living quarters, located in Vermont, as their primaryresidence during any month(s) during the benefit period of November 1 through March 31.

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

2.4 Describe how you prioritize the provision of heating assistance tovulnerable populations,e.g., benefit amounts, early application periods, etc.

No eligibility priority is given to households with vulnerable members. Eligibility processing for heads of households who are elderly (age 60 or older) or disables (in receipt of permanent disability benefits) are typically reiewed every two years along with SNAP eligibility. All others are reviewed annually.

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

- [x] Income
- [x] Family (household) size
- [x] Home energy cost or need:
  - [x] Fuel type
  - [ ] Climate/region
  - [ ] Individual bill

- [x] Dwelling type
- [ ] Energy burden (% of income spent on home energy)
- [ ] Energy need
- [x] Other - Describe:

Dwelling "size" by the number of bedrooms in the home.

PLEASE NOTE: In the "Attachments" section the "Benefit Matrix" for FFY2015 is unchanged for FFY2016. The tables have not changed and their content has not changed.

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

2.6 Describe estimated benefit levels for FY 2016:

Minimum Benefit	**$50**	**Maximum Benefit**	**$1,400**

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.

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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 componenet:

Add	Household size	Eligibility Guideline	Eligibility Threshold
1			0.00%

3.2 Do you have additional eligibility requirements for COOLING ASSITANCE?	◯ 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:	

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

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

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

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

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

3.6 Describe estimated benefit levels for FY 2016:			
Minimum Benefit	**$0**	**Maximum Benefit**	**$0**
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.

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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	HHS Poverty Guidelines	150.00%

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

CRISIS FUEL ELIGIBILITY

It is not the intent of these regulations to establish a program of entitlement, meaning that a household whose income and resources are within the specified limits and who has a home heating fuel crisis does not become entitled to a grant, and indeed may be denied. It is the intent of this regulation to provide a framework within which a crisis fuel worker, based on their judgment, may determine eligibility and grant assistance to households who face a home heating crisis.

Within this framework, crisis fuel workers will determine eligibility on the basis of assisting the household, conserving program funds, accessing other benefits for which the household may be eligible, and utilizing the household's or the community's resources to the maximum extent reasonably possible. Workers will base their eligibility judgment on each client's individual situation and crisis fuel history. Workers will make every effort to assist those who are denied eligibility to find alternative solutions to the home heating crisis and to prevent a recurrence of the crisis in the future. Crisis fuel workers shall determine eligibility for crisis assistance based on the following seven requirements.

1) Income Eligibility for Crisis Fuel Assistance

The gross monthly income of all household members shall not be greater than 200 percent of the federal poverty level based on household size. Household members, required or excluded, are identified in section 2910 above. Countable income is identified in section 2930 above.

2) Receipt of Seasonal Fuel Assistance

Based on the household's income at the time of the crisis fuel application, eligibility for crisis fuel assistance is contingent on the household first obtaining seasonal fuel assistance program benefits.

- Households that have received a seasonal fuel assistance grant and meet all crisis eligibility requirements are eligible to receive crisis fuel assistance.
- Households that, in the opinion of the crisis fuel worker, are over-income for seasonal fuel assistance and meet all crisis eligibility requirements are eligible to receive crisis fuel assistance. These households are not required to apply for seasonal fuel assistance in order to receive a crisis fuel grant.
- Households that, in the opinion of the crisis fuel worker, are income eligible for seasonal fuel assistance but have not received seasonal fuel assistance are not eligible to receive crisis fuel assistance. The crisis fuel worker must assist income-eligible households to obtain a seasonal fuel assistance grant.
- Households that are denied seasonal fuel assistance for any reason other than being over-income are not eligible to receive crisis fuel assistance. The crisis fuel worker must assist income-eligible households to obtain a seasonal fuel assistance grant.

3) Maximum Number of Crisis Grants per Season

Each household is limited to a maximum number of crisis fuel grants per season as follows:

- One grant for households that are income-eligible for and have received a seasonal fuel assistance grant and meet all eligibility requirements for crisis fuel assistance.
- Two grants for households that are not income-eligible for seasonal fuel assistance and meet all eligibility requirements for crisis fuel assistance.

4) Accessible Resources

Available cash resource limits for households with at least one member who is elderly or living with a disability are set at $1,500 for a household of one and $2,250 for a household of two or more. For all other households it is expected that every accessible cash resource will be utilized in addressing (even in part) the crisis. For purposes of this section, an accessible resource is that which may be obtained in time to resolve the crisis. For example: funds in a retirement account that cannot be obtained prior to the household running out of fuel would not be considered accessible. Property/real estate that is listed for sale would not be considered an accessible resource.

The crisis fuel worker will use judgment in protecting money set aside in a special account to pay property taxes, or money necessary

to meet immediate basic needs such as food, rent, utilities, healthcare etc., when such payments are required before the household would have resources remaining to be utilized in addressing (even in part) the fuel crisis.

The crisis fuel worker will also consider what potential resources, including income, are available and the extent to which the household can commit all or a portion of such potential toward meeting or partially meeting their current heating crisis. This potential shall include all members of the household and not simply those bearing direct responsibility for the purchase of fuel or electric service to operate the heating system.

Access to other benefit programs the client is eligible for including but not limited to: 3SqsVT, Reach Up, health care, and pharmacy benefits, Lifeline phone credit, and low income utility rates from electric and natural gas companies. Clients not accessing available benefit programs for which they are eligible must be required as a condition of a crisis fuel grant (Section 2983 paragraph 7.) to obtain specific benefit resources to be eligible for crisis assistance in the current or future crisis program periods.

5) Is There a Home Heating Crisis?

Crisis fuel assistance may be extended to alleviate a home heating emergency due to lack of heating capacity for individual households when the head of household is responsible for providing home heating fuel or utility service. The crisis fuel worker will determine if the applicant has a home heating crisis. Non-residential uses serviced by a common heating system make an application ineligible for crisis fuel assistance.

- Is the applicant the head of household or do they represent the head of household?
- Does the household have a "fuel liability" or is heat included in the rent?
- Who owns the home or who has signed a rental lease for the home?
- Is there one-quarter of a tank or less of fuel remaining?
- Is there one week or less of firewood, wood pellets or coal remaining?
- Has a disconnect notice been received for metered heat service of: electricity, natural gas, or propane?
- Does the electric service operate the heating system and has a disconnect notice been received?
- Is the head of household domiciled and physically present in Vermont?

6) Extenuating or Unpredictable Circumstance

An extenuating or unpredictable circumstance is defined as: death in the family which results in additional expenses to the applicant household; illness of a household member which results in the household incurring additional expenses; and unanticipated work-related expense necessary to preserve employment; extraordinary housing expenses which are required to remove life-threatening hazards or to keep the home habitable; or other unanticipated circumstances or occurrences which could not have been foreseen or prevented by the applicant household. Households living in poverty, or on fixed or limited incomes without sufficient funds to meet their basic needs qualifies as an extenuating circumstance. The department examines the circumstances that precipitated the fuel crisis to determine the likelihood that a similar fuel crisis will recur in the future and the degree to which the crisis was preventable. It is to the benefit of both the applicant and the department to attempt to prevent the recurrence of a fuel crisis.

7) Use of Funds Over the Past 30 Days for Basic Living Expenses

The crisis fuel worker will complete a careful assessment of past income; uses made of income and resources; relative necessity of such uses including consideration of age, health, and other factors having impact on necessity; and adequacy of planning (past and future) to avoid a home heating crisis. Households will be expected to decline or delay payment for non-essentials in favor of assuring themselves an adequate fuel supply and to make reasonable efforts to conserve fuel to avoid a crisis. The department assesses how past income was used to determine the likelihood that a similar fuel crisis will recur in the future and the degree to which the crisis was preventable. It is to the benefit of both the applicant and the department to attempt to prevent the recurrence of a fuel crisis.

8) Required Conditions of a Prior Crisis Fuel Grant

A crisis fuel worker may establish conditions to a crisis fuel grant that a household is required to meet to obtain additional crisis fuel assistance in the current or future crisis program periods. For example: clients will be required to access ESD benefits (3SqsVT, Reach Up, health care, etc.) or utility discounts (such as Green Mountain Power and Vermont Gas Systems) for which they are eligible. Or, the completion and submission of a prior crisis application documents or verification would be a required condition to obtain additional crisis assistance.

4.3 What constitutes a <u>life-threatening crisis?</u>

A life-threatening crisis is any medical condition (physical, cognitive or other) that requires a member of the fuel assistance household to remain in the home and not be temporarily relocated to an alternate residence (such as another home belonging to family or friends, a commercial lodging establishment or a residential shelter). The medical condition must be documented in writing (a letter or an email written within 30 days of the crisis fuel application) by a Vermont-licensed medical practitioner who is knowledgeable about the household member's condition. Services to resolve the home heating crisis must be completed within 18 hours of the household being determined eligible. If necessary, a benefit to pay for special trip, start-up or similar charges may be included in the crisis fuel grant.

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? See 4.2 above	(•) 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:

4.6 Eligibility requirements are outlined in 4.2. The difference between Crisis and Winter heating assistance ("Seasonal" assistance in Vermont) is that Seasonal assistance is an entitlement program: an income eligible household with a completed applications is guaranteed a benefit.

4.7 Assets Test - see item 4) in section 4.2 above

4.7 Priority - If the head of households is elderly or disabled, they are allowed to apply for crisis assistance by phone, and not come into the office. All required paperwork is done by mail. If the head of household is elderly or disabled, or if there are young children in the household, assistance (by phone) is available from 8:30 a.m. to 4:00 p.m. on Saturdays, Sundays and state holidays. All requred paperwork is done by mail for elderly and disabled. Households with young children must go into the office to complete paperwork.

4.7 In Order to Receive Crisis Assistance - see items 2), 5), 6), 7) and 8) in section 4.2 above as conditions to be met to receive crisis assistance in addition to income elgibility and the assets test.

Determination of Benefits

4.8 How do you handle crisis situations?

☑	Separate component
☐	Fast Track
☑	Other - Describe: The Department for Children & Families' "Economic Services Division" (ESD) processes eligibility year-round for seasonal fuel assistance benefits. ESD's Office of Fuel & Utility Programs maintains grant agreements with the state's five community action agencies (CAPs) to operate the crisis fuel assistance component from the last Monday in November to the last business day in April - or until funds are exhausted.

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

☑	Amount to resolve the crisis.
	Other - Describe:

☑ For oil, kerosene and propane: 125 gallons (NOTE: The average benefit of $444 in section 4.14 below is based on 125 gallons @ $3.50/gallon.))

For firewood: one cord

For coal and pellets: one ton

For electric service to run a heating system: sufficient payment to the company to maintain service for one month

For natural gas heat: sufficient payment to the company to maintain service for one month

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.

The five community action agencies operate 15 separate offices that are geographically accessible to all households where crisis fuel application application intakes are performed. By comparison, the Economic Serivces Division operates 12 district offices.

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?

If the head of households is elderly or disabled, they are allowed to apply for crisis assistance by phone, and not come into the office. All required paperwork is done by mail. If the head of household is elderly or disabled, or if there are young children in the household, assistance (by phone) is available from 8:30 a.m. to 4:00 p.m. on Saturdays, Sundays and state holidays. All requred paperwork is done by mail for elderly and disabled. Households with young children must go into the office to complete paperwork.

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

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

Winter Crisis	$444.00 maximum benefit
Summer Crisis	$0.00 maximum benefit
Year-round Crisis	$0.00 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

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):	☐	☐	☐

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 Vermont Public Service Board's Rule 3.300 "Disconnection of Residential Gas, Electric and Water Service" established detailed rules that utility vendors must comply with year-round for shut-offs. The full Rule 3.300 is available on-line at:
http://psb.vermont.gov/sites/psb/files/rules/OfficialAdoptedRules/3300_Disconnection_of_Essential_Service.pdf

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.

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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	State Median Income	60.00%

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 Ration (SIR) standards.
- ☑ Other - Describe:

Some weatherization measures that are not otherwise allowable under DOE WAP rules. See section 5.11 for more details.

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? Households receiveing fuel assistance	(•) 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.

The following households that apply and are eligible for weatherization assistance are prioritized using a "client rank algorithm" that are prioritized in the following order (from highest priority to lowest priority): (1) households receiving fuel assistance; (2) households with high energy burdens; (3) the elderly; (4) the disabled; and (5) families with children.

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 Assitance, 2605(c)(1), (B) & (D)

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

[x] Weatherization needs assessments/audits	[x] Energy related roof repair
[x] Caulking and insulation	[x] Major appliance Repairs
[x] Storm windows	[x] Major appliance replacement
[x] Furnace/heating system modifications/ repairs	[x] Windows/sliding glass doors
[x] Furnace replacement	[x] Doors
[ ] Cooling system modifications/ repairs	[x] Water Heater
[x] Water conservation measures	[ ] Cooling system replacement
[ ] Compact florescent light bulbs	[x] Other - Describe: (1) Air Sealing and Insulation; (2) Energy health and safety measures, including, but not limited to: knob and tube wiring repairs, exhaust ventilation installation and repair, smoke alarm and carbon monoxide dectector installation. A complete list of all Vermont weatherization measures, policies, and procedures can be found at: http://dcf.vermont.gov/benefits/weatherization/manual

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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:

- [x] Place posters/flyers in local and county social service offices, offices of aging, Social Security offices, VA, etc.
- [x] 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.
- [x] Mass mailing(s) to prior-year LIHEAP recipients.
- [x] 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.
- [x] Other (specify):

Mass Mailings: For Seasonal (heating) Fuel Assistance, the Vermont Economic Services Division (ESD) annually mails eligibility "renewal" documents for all public benefits that a household is receiving including LIHEAP, SNAP, TANF and healthcare programs. Other: Maintain an aggressive web presence with links between state government and non-profit programs that serve generally the same clientele. Provide annual trainings for advocates around the state. Operate an "800" state-wide "Benefits Service Center." For Seasonal (heating) Fuel Assistance, paper applications are available on-line, and clients can apply on-line.

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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:

The Department for Children & Families' "Economic Services Division" is responsible, state-wide for: SNAP, TANF, LIHEAP, all Health Care programs, General/Emergency Assistance and Essential Person benefits. A single coordinated application allows clients to apply for any benefits they require. Eligibility is coordinated and conducted once a year. Clients may apply with a traditional paper application or apply on-line. Confidential benefit information is available to clients at 12 district offices, on-line (password protected) and by phone (password protected) through the ESD Benefits Service Center.

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.

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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?

The Department for Children & Families' "Economic Services Division" is responsible, state-wide for: SNAP, TANF and LIHEAP. A single coordinated application allows clients to apply for any benefits they require. Eligibility is coordinated so that all programs are reviewed at the same time once a year. Clients may apply with a traditional paper application or apply on-line. Confidential benefit information is available to clients at 12 district offices, on-line (password protected) and by phone (password protected) through the ESD Benefits Service Center.

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

Vermont does not operate an established "cooling assistance" component.

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

Crisis Assistance Component is administered by the five community action agencies (CAPs) under annual grant agreements managed by Economic Services Division's "Office of Fuel & Utility Programs." The CAPs along with ESD and the F&U Office each perform outreach activities. ONLY the CAPs do crisis assistance intakes. When a client seeks a crisis assistance grant and has not received their seasonal fuel gran, the CAP worker will request that an ESD worker expedite that client's seasonal fuel grant to alleviate the crisis.

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

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?

Crisis - the LIHEAP Crisis Assistance Component is administered by the five community action agencies (CAPs) under annual grant agreements managed by ESD's "Office of Fuel & Utility Programs." The CAPs are an established community partner with access to non-government resources to address a client's home heat or energy crisis. This 'one stop shopping' approach to crisis resolution provides the most effective customer service possible. Weatherization - Wx is NOT a function of the ESD. Wx is the responsibility of the Dept for Children & Families' "Office of Economic Opportunity (OEO). OEO maintains grant agreements with the five Weatherization Assistance Program (WAPs) agencies - four of which are components of community action agency and the fifth is an independent Wx non-profit.

8.7 How many local administering agencies do you use? Five

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.

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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.
Seasonal fuel assistance clients that heat with firewood or wood pellets receive a cash benefit to be used to pay for wood or pellets. Clients whose heat is included in their rent receive a cash benefit to off-set the undesignated portion of their monthly rent that is applied by the landlord to pay for heat and or utilities. There are no payment exceptions for crisis fuel assistance. All payments are made to the fuel or energy supplier by the CAP.

9.2 How do you notify the client of the amount of assistance paid?
For seasonal fuel assistance: clients receive a printed notice by mail advising them of the amount of their benefit, applicable terms and the name of the fuel or energy dealer who received their benefit. Clients who are denied assistance also receive a printed notice by mail. Clients may also go on-line or by phone through the ESD Benefits Service Center obtain information about the status of their seasonal assistance benefit. Information on-line and by phone are password protected. For crisis fuel assistance: clients receive a copy of their application from the CAP indicating the grant details (amount, fuel/energy type, dealer or utility paid), or if they were denied the reason for the denial.

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?
For seasonal fuel assistance: dealers are certified by the ESD F&U Office and payment terms and conditions and prices are established (see: http://dcf.vermont.gov/sites/dcf/files/pdf/esd/fuel/Terms_Conditions.pdf). Included in those terms is a requirment that the fuel supplier provide to the eligible households periodic statements of account activity including the receipt, credit and balance of the seasonal fuel benefit. At the end of the fuel season, all certified dealers are required to submit a "Consumption and Refund Report" documenting the use of each customers seasonal fuel assistance benefti. Annually, the F&U Office audits a selected number of dealers to confirm that billing and pricing practices are in accordance with certification requirements. The seasonal fuel benefit pays only a portion of a household's winter home heating bill. Clients are directed (in their notice referenced in 9.2 above) to contact the Economic Services Division (ESD) with questions or concerns regarding their benefit. Questions and concerns regarding account activity or pricing by the fuel supplier are referred to the F&U Office for resolution. For crisis fuel assistance: dealer and utilities submit bills for payment to the CAPs. The CAPs financial staff apply accepted accounts receivable review and payment practices. The certified dealers, the CAPs and the F&U Office cooperate fully on required adjustments (positive and negative) when payment or billing errors are identified in seasonal and/or crisis fuel assistance. And, errors do occur and they are resolved.

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 terms and conditions of the fuel supplier certification agreement referenced in 9.3 above contains discrimination and confidentiality clauses. End of season audits of selected "Consumption and Refund Report" included a price comparison between the price charged to recipient households on specific dates with the supplier's "pricing sheet" for non-recipient customers. In addition the F&U Office accepts and investigates any complaint regarding discrimination in prices or services and the maintenance of confidentiality by a certified fuel supplier.

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.
The certification agreement that permits payments to all certified fuel suppliers, regulated and unregulated, require annual the annual Consumption Reports referenced in 9.3 above. That information is shared with the Weathization Offices. Wx services prioritize their services to LIHEAP recipients, with the highest energy consumption, and with 'vulnerable' household members.

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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 Economic Services Division (ESD) of the Vermont Department for Children and Families (DCF)together with the DCF Business Office monitor the LIHEAP funds. The Fuel & Utility Director meets monthly with a senior manager in the Business Office to review the past month's expenditures (including benefits issued) and update the budget. This process provides checks and balances on the management of program funds. All expenditures, check returns and refunds are recorded on a daily basis and are processed through the state-wide VISION fiscal managment system. The program benefit financial recorded and available daily. Monthly, all Fuel Program accounts are balanced against the monthly statement from VSION. If there are any discrepancies, they are accounted for. The state has contracted with the firm of KPMG Peat Marwick to audit expenditures of amounts received under this title as an integrated audit with other state programs in a single audit authorized under OMB Circular A-133.

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 ☑

Finding	Type	Brief Summary	Resolved?	Action Taken
1				

10.4. Audits of Local Administering Agencies

What types of annual audit requirements do you have in place for local adminstering 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:

When applicable, the F&U Office will conduct sample reviews for Seasonal Fuel Assistance to review program eligibility and benefit determination in compliance with policies and procedures. Typically these reviews are for recent or complex changes made to any component of eligibility or benefit issuance, or when a pattern of questionable practice has been identified.

Local Adminstering Agencies / District Offices:

- [x] On - site evaluation
- [ ] Annual program review
- [ ] Monitoring through central database
- [ ] Desk reviews
- [x] Client File Testing / Sampling
- [x] Other program review mechanisms are in place. Describe:

Targeted reviews for Crisis Fuel Assistance are established annually in the grant agreements as a "performance measure." All five Community Action Agency sub-grantees are required to report on a specific issue or conditon of eligibility, household composition, benefit, or a combination. In general, these targeted reviews serve two purposes: program compliance and improved customer service. Crisis Fuel workers in each of the state's five community action agencies (CAPSs) determine CFA eligibility and grant amounts during the CFA season. CF workers are supervised by a CF Coordinator in each CAP. The CF Coordinator serves as the primary contact for all CF program eligibility and grant matters. During the CF season (last Monday in November until the last business day in April, or until funds are exhausted) the Fuel & Utility Programs Office provides program support, policy clarifications, technical assistance, and program monitoring as follows: Required CF Trainings: November 18 & 20, 2014 Opening Day (Nov 24/14) Technical Assistance Visits at 4 CAP offices Monthly CF Conference Calls Monitoring Visits with no less than 3 agencies Meet with CAP Director and CF Coordinator Observe CF intakes and decision making (with client's consent) Review use of ACCESS database for CF eligibility determination Review criteria for and progress toward current year's grant agreement required "performance measure" Provide the agency with a written report of the monitoring visit

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

Five community action agencies (CAPs) act on behalf of the DCF Economic Services Division through grant agreements for the operation, eligibility determination, and benefit issuance for Crisis Fuel Assistance.

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

Site Visits: For crisis fuel assistance the five local agencies are community action programs (CAPs). Site visits are conducted by the F&U Office with no less than three agencies per season. Site selection for agencies and their primary offices are rotated annually. Monitoring reviews happen at two points during the year. First - through technical assistance visits while the program is in operation and during regular business hours. This allows staff from the F&U Office to observe, contrast and compare operations and gleen best practices. It is also an opportunity for immediate feedback, clarification or correction related to policy and procedures. Problems or opportunities observed in one agency are reported to all as a way to improve overall performance. Second - when final reports are submitted the F&U Director reviews for outlying indicators. These might be only a reporting or numbers error. Or they could be a more serious indicator of situational extremes that require further analysis and possibly corrective action. All findings, positive and negative, are reported to the local agency. Aggregated findings, positive and negative, are shared with all five agencies.

Desk Reviews: Desk reviews are not conducted for the Crisis Fuel program.

10.8. How often is each local agency monitored ?
No less than every other year.

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? None

10.12. How many local agencies are currently on corrective action plans for financial accounting or administrative issues? None

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

The Home Energy Assistance Task Force (HEAT Force) is a LIHEAP advosory committee established in Vermont statute. HEAT Force is emailed a copy of the draft plan and is engaged directly by the Fuel & Utility Office.

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

No changes were made to the Plan as a result of the comments received for one group.

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	08/28/2014	Block Grants Public Hearing, held at the VT Agency of Human Services, 208 Hurricane Lane, Williston, VT

11.4. How many parties commented on your plan at the hearing(s)? 1

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

A public hearing was held on August 28, 2015. A copy of the Hearing Minutes are attached. submission. As a group, the Executive Directors of Vermont's five Community Action Agencies (CAPs) submitted a single set of comments and recommendations. Two comments were concerned with the maximum number of crisis fuel grants per winter. Two were regarding conditions of eligibility for assistance. The final comment was about the times when "after-hours" assistance was available. A copy of the comments and the LIHEAP coordinator's responses are in the Attachments section.

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

No changes were made to the Plan as a result of the comments received from one group.

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.

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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? 15 approximate

12.2 How many of those fair hearings resulted in the initial decision being reversed? 5 approximate

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

None. Initial decisions were reversed not by the hearing officer rather by the senior program policy staff in the Fuel & Utility Office.

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

Clients may ask for a fair hearing if their claim for assistance, benefits, or services is denied, or in not acted upon with reasonable promptness; or because they are aggrieved by any other ESD action affecting their receipt of assistance, benefits , or services, or they are aggrieved by ESD policy as it affects their situation.

12.5 When and how are applicants informed of these rights?

Applicants are informed of their rights to a fair hearing first on their applications for benefits/assistance and every time they are notified of an action or decision regarding their application.

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

Clients may ask for a fair hearing if their claim for assistance, benefits, or services is denied, or in not acted upon with reasonable promptness; or because they are aggrieved by any other ESD action affecting their receipt of assistance, benefits , or services, or they are aggrieved by ESD policy as it affects their situation.

12.7 When and how are applicants informed of these rights?

Applicants are informed of their rights to a fair hearing first on their applications for benefits/assistance and every time they are notified of an action or decision regarding their 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.

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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?

Vermont supports four firewood programs around the state that serve LIHEAP recipients who utilize firewood as their renewable home heating fuels.

1) Northeast Firewood Project provides free firewood to LIHEAP recipeints through NEKCA community action agency and the St. Johnsbury district Agency of Human Services Field Director.

2) Lamoille County Firewood Project provides free firewood to LIHEAP recipeints through United Way of Lamoille (VT) County and area community partners.

3) South West Vermont Firewood Project provides free firewood to LIHEAP recipeints through BROC - Community Action for SW Vermont and area community partners.

4) Central VT Firewood Project provides free firewood to LIHEAP recipeints through Capstone Community Action and the local RSVP (Retired Seniors Volunteer Program).

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

Funds for Assurance 16 activities are specifically identified in the ESD LIHEAP Budget and related expenditres are coordianted with the DCF/ESD Business Office. Maximum amounts are establisehd for FFY2015 as follows:

1) Northeast VT Firewood @ $15,000.

2) Lamoille Firewood @ $10,000

3) South West VT Firewood @ $10,000

4) Central VT Firewood @ $7,000

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

For households that receive free firewood their winter heat financial burden will be lowered. Funds saved on firewood will be available to the family for other expense necessities.

13.4 Describe the level ofdirect benefitsprovided to those households in the previous Federal fiscal year.

Firewood projects provide one or two cords of firewood delivered free to eligible households was with a conservative estimated value of $175-$200 per cord.

13.5 How many households applied for these services? 120 estimated

13.6 How many households received these services? 100 estimated

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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.

In grant agreements or memos of understanding where a leveraging activity takes place, sub-recipients or grantees or sub-grantees are required to provide information about their activites, grants, clients (including income maximum), and any other pertinent data to substantiate a submission for the Leveraging Incentive Program.Â

14.3 For each type of resource and/or benefit to be leveraged in the upcoming year that will meet the requirements of45 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	MARGIN OVER RACK (MOR) and DISCOUNT OFF RETAIL (DOR) Criteria (ii)	Certified oil, propane and kerosene dealers.	Through the Department's fuel supplier certification agreement, dealers of heating oil, propane and kerosene must enter into a pricing agreement to participate in the seasonal (winter) fuel assistance program. Dealers voluntarily participate in the fuel program and choose with MOR or DOR price agreements. The Margin Over Rack (MOR) agreement daily establishes a market wholesale (ÂrackÂ) price plus a margin amount. Added together the rack price plus margin set a daily maximum price per gallon for oil, propane and kerosene purchased with fuel assistance funds. The Discount Off Retail (DOR) agreement allows fuel dealers to set their own daily prices for all customers (in receipt of fuel assistance or not). DOR then requires that oil, propane and kerosene prices include a 15 cent per gallon discount in addition to the dealerÂs regular cash or prompt payment discount, if any. Both the MOR and DOR lower the per gallon price of fuel purchased with a clientÂs seasonal (winter) assistance benefit and/or with a clientÂs crisis fuel assistance grant and increase the amount of fuel provided.
2	CONTRIBUTION of STATE GENERAL FUND DOLLARS Criteria (ii)	State of Vermont general fund.	The state annually budgets a contribution of Âgeneral fundÂ dollars to the fuel assistance program. The funds are administered by the Fuel Office to increase seasonal (winter) fuel assistance benefits either directly or by off-setting funds that otherwise would have been used for program administration.
3	STATE FUNDED WEATHERIZATION ASSISTANCE Criteria (ii)	State of Vermont gross receipts tax on utilities and fuel.	The state generates additional annual revenue that expands the assistance of the Weatherization Program. These program-dedicated funds are raised through a l/2 of 1 percent fuel gross sales receipts tax on utilities and fuel vendors. This enables the five state WAPs to serve more households annually. Clients in receipt of fuel assistance, LIHEAP, are given the highest priority for Weatherization services. All clients who receive a winter crisis fuel benefit are directly referred to Weatherization for services.
4	GREEN MOUNTAIN POWER ENERGY ASSISTANCE PROGRAM (EAP) DISCOUNT and ARREARS FORGIVENESS Criteria (iii)	Rate-payers of Green Mountain Power Corporation as approved by the Vermont Public Serivce Board	Begun on December 15, 2012, eligible customers of Green Mountain Power (GMP) Corporation receive a 25% discount off their monthly charge for the first 600 kilowatt hours of energy used. To be eligible customers must be residential customers and have a total gross household income at or below 150% of the federal poverty level. In addition, eligible customers with an outstanding balance over 30 days and who apply for the program for the first time between December 15, 2012 and March 15, 2013 or between October 1, 2014 and December 31, 2014 will have the full arrears forgiven. The discount and arrears forgiveness help to lower a clientÂs energy burden. Under an agreement with GMP the Fuel and Utility Assistance Office are responsible for eligibility determination. The 150% income limit matches the stateÂs eligibility limit for receipt of a seasonal (winter) fuel assistance benefit. The Fuel and Utility Assistance Office performs direct outreach to clients with GMP heat and to fuel assistance client in the GMP service territories. The GMP discount is integrated directly through the Crisis Fuel Assistance component.
			Begun on July 1, 2013, eligible customers of Vermont Gas Systems (VGS) receive a 20% discount off their monthly natural gas bill (regardless of what

5	VERMONT GAS SYSTEMS DISCOUNT Criteria (iii)	Rate-payers of Vermont Gas Systems Incorporated as approved by the Vermont Public Serivce Board	the product is used for). To be eligible customers must have a residential account and a total gross household income no greater than 185% of the federal poverty level. The discount helps to lower a clientÂs energy burden. Under an agreement with VGS the Fuel and Utility Assistance Office are responsible for eligibility determination. The 185% income limit matches the stateÂs eligibility limit for receipt of a seasonal (winter) fuel assistance benefit. The Fuel and Utility Assistance Office performs direct outreach to clients with VGS heat and to fuel assistance client in the VGS service territories. The VGS discount is integrated directly through the Crisis Fuel Assistance component.
6	POWER PARTNERS PROGRAM ARREARS FORGIVNESS Criteria (iii)	Rate-payers of Green Mountain Power Corporation as approved by the Vermont Public Serivce Board	Green Mountain Power (GMP) provides electric service to an estimated 70% of VermontÂs homes. GMPÂs Power Partners Program assists low-income customers (households with incomes from 151% to 200% of FPL based on household size) by forgiving a portion of their arrears balance. This program assists customers who are not income eligible for the GMP EAP identified in 4) above. The arrears forgiveness and a repayment plan for the unforgiven portion help to lower a clientÂs energy burden and improve the management of their utility bill. Power Partners is integrated through the Crisis Fuel Component.
7	WARMTH Program Criteria (iii)	Donations by rate-payers and their utilities throughout Vermont.	Community Action Agencies administer a full spectrum of services to households with an energy crisis including LIHEAP-funded crisis fuel assistance, advocacy, negotiations with fuel providers, budget counseling and energy use reduction. WARMTH financial assistance is funded through customer donations to participating utilities. The utilities transfer the funds to the Community Action Agencies who distribute the benefits to income eligible households. The cost of program administration is off-set by the Department with an annual grant of $25,000 from LIHEAP funds. Assistance is available to households with a combined gross income of not more than 200% FPL. A WARMTH grant often is the last safety net available when crisis fuel assistance funds have been exhausted or when the crisis assistance season is closed. WARMTH is integrated through the Crisis Fuel Component.
8	HEATING SYSTEM REPLACEMENTS Criteria (iii)	State of Vermont gross receipts tax on utilities and fuel.	Through a Department agreement with the State Office of Economic Opportunity (SOEO), payments for emergency heating system replacements for LIHEAP income eligible households is paid by State Funds administered through the Weatherization Fund of SOEO. These funds are raised through a l/2 percent fuel gross sales receipts tax on utilities and fuel vendors. The Department refers clients directly to the local Weatherization operator during business hours and contacts SOEO approved contractors at all other times. Heating System Replacements are integrated through the Crisis Fuel Component.
9	SETTLEMENT of LEGAL ACTION(s) Criteria (ii)	Private corporations.	Occasionally, the settlement of a legal action, compliance violation or lawsuit will result in funds being graciously ÂdonatedÂ to VermontÂs fuel and utility assistance programs. These funds are administered by the Fuel & Utility Assistance Office to increase seasonal (winter) fuel assistance benefits either directly or by replacing funds that otherwise would have been used for program administration.

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Section 15: Training

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

a. Grantee Staff:

- [x] Formal training on grantee policies and procedures

How often?

- [ ] Annually
- [x] Biannually
- [ ] As needed
- [ ] Other - Describe:

- [x] Employees are provided with policy manual
- [ ] Other-Describe:

b. Local Agencies:

- [x] Formal training conference

How often?

- [x] Annually
- [ ] Biannually
- [ ] As needed
- [ ] Other - Describe:

- [x] On-site training

How often?

- [ ] Annually
- [ ] Biannually
- [x] As needed
- [x] Other - Describe: as requested

- [x] Employees are provided with policy manual
- [x] Other - Describe

The F&U Office conducts "mini-traings" and program updates with community based-organizations around the state from August through October. This provides program staff with the opportunity to keep partners, advocates and interested parties up-to-date on both LIHEAP fuel assistance and utility discount programs.

c. Vendors

- [ ] Formal training conference

How often?

- [ ] Annually
- [ ] Biannually
- [ ] As needed
- [ ] Other - Describe:

- [x] Policies communicated through vendor agreements
- [ ] Policies are outlined in a vendor manual
- [x] Other - Describe:

Annually, at predictable points in the fuel assistance season, vendors are advised/reminded of their benefit management responsibilities as third party payees under the terms of Fuel Program Certification Agreement. This includes reporting questions or concerns to the Fuel & Utility Office of fraud, abuse and/or eligibility. Vendors are the most frequent reporters of client eligibility that might lead to a finding or fraud or abuse.

15.2 Does your training program address fraud reporting and prevention?

- (•) Yes
- ( ) No

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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.

Benefit Targeting Index for High Burden Households - measures the extent to which the highest benefits are provided to the LIHEAP recipient households with the highest energy burden (the percent of gross income spent on utility costs). For the past two years, at the end of each heating season, Vermont has collected household consumption digital-data in dollars and in gallons from LIHEAP recipients' fuel suppliers. The Fuel & Utility Office is currently working with the Weatherization program office. At the direction of the State Legislature both Fuel and Wx are gathering the data to more clearly define client energy burdens. The expectation is that such data will result in meaningful modifications to LIHEAP benefits. The Fuel and Wx report and recommendation are due to the legislature in January, 2015. As a result of that work actual the expectation is that by the end of FFY2015 there will be a plan to implement a Benefiot Targeting Index. Energy Burden Reduction Index for High Burden Households - measures the extent to which LIHEAP benefits are adequate to deliver the same energy burden reduction to high burden recipient households as to low and moderate burden recipient households. Vermont's current benefit matrix employees a series of "proxy" energy burdens for households based on housing type, housing size (by bedroom count) and fuel type. Those "proxy" burdens are matched with the households's income against a benefits payment chart based on income. The chart employs 12 income ranges - with the greatest benefits going to the households with the lowest incomes and the smallest benefits going to the households with the greatest incomes. The combination of the proxy burdens and the graduated benefits based on income will form the basis of meeting the Energy Burden Reduction Index goal.

Prevention of Loss of Home Energy Services - the unduplicated count of households where LIHEAP prevented the loss of home energy services. Vermont maintains a very aggressive Crisis Fuel Assistance component, accessible to clients seven days a week. Vermont believes that the Prevention of Loss goal is met by the current Crisis Fuel Assistance component. Providing an unduplicated count of households where LIHEAP prevented the loss of home energy services is planned to be available in the coming year. Restoration of Home Energy Services - the unduplicated count of households where LIHEAP restored home energy services to the client. Vermont's Crisis Fuel Assistance component is structured as a "preventative" service. Clients are encouraged and allowed to seek assistance when they are down to 1/4 of a tank of fuel or when they receive a utility service disconnection notice. However, many times Crisis Fuel Assistance must be utilized to restore home heat or electric service to run a heating system. Providing an unduplicated count of households where LIHEAP restored the loss of home energy services is planned to be available in the coming year.

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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
- [x] 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
- [x] Other - Describe:

Issues related to benefit fraud or abuse and household eligibility most often are referred to the Fuel & Utility Office. The F&U Office investigates all reports of fraud or abuse of benefits. When a viable finding is made, the case and supporting documentation is forwarded to either the Economic Services Divsion (ESD) Fraud Unit or the Assistant Attorney General's Office. Typically, 'client' fraud is referred to the ESD Fraud Unit and 'dealer' fraud is referred to the AAG's Office.

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

- [ ] Printed outreach materials
- [ ] Addressed on LIHEAP application
- [ ] Website
- [x] Other - Describe:

Fuel suppliers and utility companies certified by the Fuel & Utility Office to participate in the LIHEAP program are a frequent source of information or concerns regarding client eligibility that might be fraud. Through formal email notices several times a year from the F&U Office, certified fuel suppliers are advised to report concerns of fraud, duplicate benefits, household compostion or housing data that is at variance with the information that ESD maintains. Certified fuel suppliers operate under a confidentiality clause in their certification.

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)	[x]	Required	[x]	Required	[x]	Required
	[ ]	Requested	[ ]	Requested	[ ]	Requested
Government-issued identification card	[ ]	Required	[ ]	Required	[ ]	Required

(i.e.: driver's license, state ID, Tribal ID, passport, etc.)	☐	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		☐	☐	☐	☐	☐	☐

b. Describe any exceptions to the above policies.
Newborn children are provided a "place holder" number in the social security data-entry field. Other individuals who are excluded from the fuel assistance household do not have to provide documentation.

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:

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:

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:
- ☑ Computer data matches:
  - ☑ Income information matched against state computer system (e.g., SNAP, TANF)
  - ☑ Proof of unemployment benefits verified with state Department of Labor

- [x] Social Security income verified with SSA
- [ ] Utilize state directory of new hires
- [x] Other - Describe:

LIHEAP winter (Seasonal) fuel assistance eligibility is processed by Benefit Programs Specialists in the DCF Economic Services Division. Benefits for LIHEAP, SNAP (3SqsVT), TANF (Reach Up in Vermont) and health care programs all utilitize the same eligibility main-frame database.

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.

- [x] Policy in place prohibiting release of information without written consent
- [x] Grantee LIHEAP database includes privacy/confidentiality safeguards
- [x] Employee training on confidentiality for:
  - [x] Grantee employees
  - [x] Local agencies/district offices
- [x] Employees must sign confidentiality agreement
  - [x] Grantee employees
  - [x] Local agencies/district offices
- [x] Physical files are stored in a secure location
- [ ] Other - Describe:

17.7. Verifying the Authenticity

What policies are in place for verifying vendor authenticity? Select all that apply.

- [x] 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
- [x] Other - Describe and note any exceptions to policies above:

Vendors of firewood and wood pellets are not required to be certified with the Fuel & Utility Office. The payment to client rather than the vendor exception is for clients who heat with firewood or pellets. Due to supply and variations in quality and quantity, firewood and pellet client have greater success in obtaining quality product when all suppliers in the market are accessible to them.

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
- [x] Data exchange with utilities that verifies:
  - [x] Account ownership
  - [x] Consumption
  - [ ] Balances
  - [ ] Payment history
  - [x] Account is properly credited with benefit
  - [ ] Other - Describe:
- [x] Centralized computer system/database tracks payments to all utilities
- [x] 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
- [x] Payments to utilities and invoices from utilities are reviewed for accuracy
- [x] 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

- [x] Procedures are in place to require prompt refunds from utilities in cases of account closure
- [x] Vendor agreements specify requirements selected above, and provide enforcement mechanism
- [x] Other - Describe:

Some items checked above may be performed on a sample basis at the end of the winter heating season.

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.

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

Benefits are paid directly to clients that heat with firewood or wood pellets. Some items checked above may be performed on a sample basis.

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
- [x] Refer to local prosecutor or state Attorney General
- [ ] Refer to US DHHS Inspector General (including referral to OIG hotline)
- [x] Local agencies/district offices or Grantee conduct investigation of fraud complaints from public
- [x] Grantee attempts collection of improper payments. If so, describe the recoupment process

The party in question is contacted by phone and/or in writing. They are advised of the issues and specific actions are outlined with a specific date for compliance. The party is advised that failure to respond or comply will escalate the case either to the ESD Fraud Unit or the Assistant Attorney General. Most cases are resolved at this basic communication level.

- [ ] Clients found to have committed fraud are banned from LIHEAP assistance. For how long is a household banned?
- [ ] Contracts with local agencies require that employees found to have committed fraud are reprimanded and/or terminated
- [x] 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.BrBbr.

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

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)

Department for Children & Families, Economic Services Division * Address Line 1		
967 IBM Road Address Line 2		
Address Line 3		
Essex Junction * City	Vermont * State	05452 * 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

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

(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

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(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 disbursal 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).**