

## LOUISIANA LIHEAP SERVICE DELIVERY GUIDE FREQUENTLY ASKED QUESTIONS (FAQs)

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### ADMINISTRATIVE OPERATIONS

**Q1: Are agencies still required to request approval from LHC to use an In-House Service Delivery Guide?**

**A1:** Yes, LHC must approve any changes that a Subgrantee proposes for use that are outside of LHC guidance. LHC expects all Subgrantees to abide by the guidance set forth at the State/Grantee level. Subgrantee policies, procedures, and forms are expected to mirror the Louisiana LIHEAP Service Delivery Guide, Louisiana Annual Model State Plan, and Subgrantee Agreement, unless LHC has allowed some flexibility for Subgrantee procedures as stated in these documents (i.e. Intake Procedures, Grievance Procedures, etc.). LIHEAP policies that allow flexibility at a Subgrantee level may not be more stringent or more relaxed than the requirements that LHC has provided.

Per LIHEAP Service Delivery Guide, Section 1.2, *LHC shall review Subgrantees' policy and procedure manuals to ensure that they are updated, accurate, and in compliance with DHHS regulations and guidelines. A copy of this Service Delivery Guide is provided to all Subgrantees. In addition, Subgrantees are required to acknowledge receipt of and adhere to the provisions of this Service Delivery Guide to ensure compliance with all federal regulations as well as all applicable Louisiana statutes. The Subgrantee must provide copies of the policy and procedure manual to all intake workers, who shall be instructed to read and become familiar with the provisions contained in the manual. LHC will review Subgrantees' copy of the Service Delivery Guide, during monitoring visits, to ensure the guides are updated, accurate, and complies with DHHS regulations and guidelines.*

## **ELIGIBILITY AND INCOME DETERMINATION**

**Q2: In regards to the government-issued photo ID for all members 18 and over, if available: When it comes to “if available”, what are the exceptions?**

**A2:** Per the LIHEAP Model State Plan, Section 17.2.a, a government-issued identification card is no longer required for all adult household members, just requested. It is only required for the applicant. If the photo identification for any other adult household member is requested and received, place the copies in the applicant’s file. If the identification is not available, no further action is required.

**Q3: In the guide, proof of identity is defined as a government-issued identification with the applicant's name. Does the term "State" Issued Identification mean ANY state or just the State of Louisiana? Will the Matricula Consular Identification Card be added to the list of acceptable documents as is it a "government-issued identification card"?**

**A3:** Any State issued Driver’s License or Identification Card may be provided as proof of identity for a government-issued photo identification.

Per LIHEAP Service Delivery Guide, Section 3.6.A, *Acceptable documents may include: .....Tribal Identification Card, etc.* The words “may” and “etc.” allow for other government-issued photo identifications to exist; therefore, there are no plans to add to this list in the Guide.

**Q4: Regarding counting any income of a household member age 18 years and older, if a parent has no income and their minor child has SSA or SSI, do we count that child’s income or have the parent fill out a zero income form?**

**A4:** You must count the social security income that the parent is receiving on behalf of their minor child.

**Q5: On Page 31, it states that we must have all checks stubs from the previous 30 days as the documentation for earned income. Then, on page 32, it references “at least two of four consecutive check stubs”. Which is it?**

**A5:** You must use all check stubs from the previous 30 days. This will vary for each client based upon how the client is paid (weekly, bi-weekly, bi-monthly, or monthly). The example in the LIHEAP Service Delivery Guide, Chapter 3, Section 3.6.C.2.c.iii. refers to how to determine when to include check stubs with overtime. The example uses a person who would turn in 4 check stubs. The example demonstrates you should include overtime when 2 of 4, or half, of the check stubs received have overtime. In addition, if an applicant only receives payment once a month, you would count any overtime on their check stub, since it is the only check stub required to document their income.

**Q6: How should we document the file that we have exhausted all other income eligibility avenues prior to allowing a client to use Self-Certification?**

**A6:** Document the file by entering a written description of what avenues were taken on a Client Contact Log and include copies of all information sent to the client and their employer to request information. Per LIHEAP Service Delivery Guide, Chapter 3, Section 3.6.C.2.d.v., Self-Certification must include *a notarized statement signed by the potential applicant indicating that the applicant has no other proof of income.*

**Q7: How do we count the income of Uber/Lyft drivers, Waiter/Uber Eats/DoorDash deliverers, etc.?**

**A7:** This type of income should be counted as Self Employment.

**Q8: Are we required to compare the Appendix G Self Employment - Self Certification form to their bank statements?**

**A8:** Yes, per the LIHEAP Service Delivery Guide, Chapter 3, Section 3.6.C.2.a, *Self-employed applicants must provide a copy of their most recent federal income tax return with all accompanying schedules for the most recent year ending December 31<sup>st</sup>. If self-employment recently began, the tax return has not been filed, or it is after April 15<sup>th</sup>, the applicant must also complete the Self-Employment Self Certification Form (Appendix G) attesting to current monthly earnings and losses **supported by the corresponding bank account statements**. Unless there is reason to doubt the Self Certification, the most current documentation will be used to calculate income.*

**Q9: If a client claims self-employment but does not use bank statements, what other documentation is acceptable?**

**A9:** As discussed in **A8**, the client's most recent tax return is the first (1<sup>st</sup>) method of verifying self-employment income. If the client does not have tax returns, then the Self-Employment Self Certification Form is required with supporting documentation. If bank statements are not available, the client must submit documentation to support their earnings (invoices, receipts, etc.) and losses (business expenses).

**Q10: If a client comes in and started working the day before the application was taken, do I count foreseeable income (projected income)? The client has no check stubs. Should I send an income verification form to the client's employer for that 1 day of work?**

**A10:** Yes, per the LIHEAP Service Delivery Guide, Chapter 3, Section 3.6.C.2.a, *if the applicant does not have all the required check stubs, the **Verification of Employment (VOE) (Appendix F)** must be completed.*

You are collecting the information to determine the AVERAGE monthly income. This is the same reason check stubs are collected.

**Q11: What is the purpose of a Section 8 or public housing tenant providing a lease? (Page 36)**

**A11:** The Section 8 lease provided by the client, regardless of the date it was signed, can be used to establish vulnerability as long as it clearly lists the client's address. The new LIHEAP Service Delivery Guide, Section 3.6 E.2., lists examples of documentation that may be used to document vulnerability (aka responsibility). If the example mentioned does not specifically state it must not be older than 30 days, you may use it as proof of vulnerability regardless of date.

**Q12: What is meant by a Statement from public housing authorities in regards to verification of utility allowances? (Page 41)**

**A12:** Subgrantees must be able to document the utility allowance a Section 8 renter receives to avoid duplication of utility benefits. If a renter receives Section 8 assistance and cannot provide a HUD form or some other type of document (i.e. lease, notification of annual recertification, etc.) that shows the monthly utility allowance received, an official email or letter on letterhead from the issuing Section 8 entity stating what the utility allowance is will suffice.

**Q13: We have a client that is on Section 8 and they have not recertified because they were just certified on February 2021. The Section 8 information provided indicates that the client has income in the home as well as additional family members. The client tells the intake worker that the income is no longer valid and that some members of the household are no longer in the home. Does the intake worker insist, or push, to gather information, such as SSNs, for the missing household members and/or require the client to go the Section 8 office to make the changes? Should we count, or get documentation, for income that is no longer valid?**

**A13:** The Subgrantee should downsize the household on the LIHEAP application. However, you must still verify that the income is no longer valid or being received by the household. This may require evidence that the former household members no longer reside at the LIHEAP applicant address.

You do not need to require the client to go to the Section 8 office to make the changes. Section 8 has more stringent income verification methods that LHC will be working to acquire for LIHEAP in the future. You should report the income listed on the Section 8 certification unless the client can prove the income change.

**Q14: Can the February 2021 Section 8 document received still be used to determine vulnerability even if it is not exactly valid?**

**A14:** The Section 8 certification (HUD-50058 or -50059) **normally** only lists a property's name on it, not a service address. The LIHEAP Service Delivery Guide, Chapter 3, Section 3.6.E.2., lists examples of documentation that may be used to document vulnerability. If the example mentioned does not specifically state it must not be older than 30 days, you may use it as proof of vulnerability regardless of date. If the Subgrantee can demonstrate the service address of the property listed on the Section 8 certification, it is an acceptable form of supporting documentation for the address.

**Q15: We have had Section 8 Resident Worksheets and client leases that have an address that is different from the Entergy bill. The reason for this is listed below and we are seeking some guidance in proceeding with assisting this type of client.**

- **One reason is because the Entergy reading meter is located on a different street around the apartment complex/ multi-unit. (Example: The client stays on 4720 Jeff Davis, but the Entergy meter is on 2532 Martin Luther King. The bill has the Jeff Davis address as the mailing address, but the service address is on Martin Luther King. The Resident worksheet and lease all have the 4720 Jeff Davis address as the dwelling.)**
- **This also occurs when city or parish decide to rename streets, and it never gets updated in Entergy system. (Example, the city has decided to change S Jeff Davis and N Jeff Davis into Norman C Francis, but the Entergy bill doesn't reflect that change on the client's bill.)**

**A15:** In this case, it would be acceptable to document the file as described in the above question. You could do this with a Google map printout, or other means. Do not deny assistance.

**Q16: Section 8 Lease questions regarding establishing vulnerability:**

- **Client has a lease that hasn't been updated by the landlord but is still living in the home. Should the client be asked to get a current, or updated, lease from the landlord even though they were not provided with one?**
- **Can we still use an outdated lease despite no change within the household members or initial agreement between both parties?**
- **If a month to month lease hasn't been updated, can we still use them to verify client address?**

**A16:** The Section 8 lease provided by the client, regardless of the date it was signed, can be used to establish vulnerability as long as it clearly lists the client's address. The new LIHEAP Service Delivery Guide, Section 3.6 E.2., lists examples of documentation that may be used to document vulnerability (aka responsibility). If the example mentioned does not specifically state it must not be older than 30 days, you may use it as proof of vulnerability regardless of date.

**Q17: Scenario: Someone is reporting zero income; however, when completing the Zero Income Supplemental Form, we learn the household has a car note for \$200.00 and a relative helps them pay. It was stated in the training that a Contribution Form must be filled out. Do we count that as income?**

**A17:** Yes, the relative will need to complete the Statement of Contributions Form (Appendix K) and indicate what the \$200/month is used to pay. This Regular Contribution will then be counted as income.

Per LIHEAP Service Delivery Guide, Section 3.6.C.2.d.iv, *Contributions received by the applicant on a regular basis (i.e. weekly, bi-weekly, monthly, and quarterly) and that are not loans which are to be repaid must be counted as income.*

**Q18: When the expenses listed on the zero income form exceed the contributions, how do we address that? Will that be an issue during monitoring?**

**A18:** After all forms are completed and expenses still exceed exempt income and any regular contributions, the client will need to bring a notarized Self-Certification statement explaining how the rest of the expenses are paid (or not paid) to document the file. As long as all required documentation is in the client file, there will not be any monitoring findings. Documentation for no income in the household should include:

- ❖ Zero Income Statement Form (required – all household members 18 years of age or older)
- ❖ Zero Income Supplemental Sheet (required – applicant only),
- ❖ Statement of Contributions (as needed when regular contributions are discovered from an outside party or family member)
- ❖ Self-Certification explaining how expenses are paid, or not paid (as needed if expenses exceed regular contributions and exempt income).

This is only to document the file that the tenant was given every opportunity to report income accurately. **At no time, should expenses ever be considered as income.**

**Q19: For Income Inclusions, it says gross on government pensions, so other pensions such as Railroad, Teachers, municipalities or private can be net? (We are only asking, because we are allowed to use Bank Statements for proof of income but that will not show the GROSS only the NET?)**

**A19:** All Pensions and Retirements listed on the Income Inclusion chart are listed as **Gross**. Private pensions cover both work place pensions set up by your employer and personal pensions set up by the individual.



**Q20: On household members that are 18 years old that are still in school, will they need to complete the Zero Income Form and provide their ID?**

**A20:** Adult household members who are 18 years of age or older must fill out the Zero Income Statement Form, regardless of Student Status, if they have no income.

Per the LIHEAP Model State Plan, Section 17.2.a, a government-issued identification card is no longer required for all adult household members, just requested. It is only required for the applicant. If the photo identification for any other adult household member is requested and received, place the copies in the applicant's file. If the identification is not available, no further action is required.

**Q21: If the Head of Household has Social Security income and their 18+ grandchild has zero income, do they have to complete the zero income statement and no supplemental sheet?**

**A21:** In this instance, the 18 year old grandchild with no income would be required to complete the Zero Income Statement Form. However, the household has income; therefore, the Zero Income Supplemental Sheet is not required.

**Q22: Can we continue using a letter from the employer on letterhead as income verification?**

**A22:** If the letter is on company letterhead and has all of the required information needed to determine a client's average monthly income, the letter can be accepted as employment verification. This type of document would substitute the Verification of Employment (VOE) (Appendix F).

**Q23: How do you determine income for a person who gets paid twice a month with overtime on one check stub?**

**A23:** In the LIHEAP Service Delivery Guide, Section 3.6.C.2.c.iv., it states it may be necessary for the subgrantee to contact the applicant's employer to determine if the fluctuation (aka overtime) is a regular occurrence. In addition, in Section 3.6.C.2.c.iii., the example shows that if half of the presented check stubs (2 out of 4) have overtime, the overtime should be included when determining the client's income. Therefore, unless the employer can provide documentation that the overtime is not a regular occurrence, include the check with the overtime to determine the client's average monthly income.

**Q24: If you use a SNAP letter from the last 12 months to verify SS income, is it still valid when the income changes for the current year?**

**A24:** Yes, you would use the Social Security income listed on the SNAP letter.

Per LIHEAP Service Delivery Guide, Section 3.6.C.2.b, *Documentation of Social Security benefits may include Food Stamp (SNAP) certification letter or printout dated within the past 12 months of the application date.*

**Q25: In the manual, it states that if you have zero income the client must have a notarized statement to put in the file. If they provide a print out from the Food Stamp (SNAP) office or the child support office, do they still need the notarized statement?**

**A25:** As discussed in **A24**, the only income that can be verified using the Food Stamp (SNAP) certification letter is Social Security benefits. Any other type of income must be verified using the verification requirements indicated in the LIHEAP Service Delivery Guide, Section 3.6.C.2.

Per the LIHEAP Service Delivery Guide, Section 3.6.1.b., child support payments are not counted as income. Clients can provide this information; however, it must not be counted as income. It can be used on the Zero Income Supplemental Form to determine how a client pays their expenses, as needed. Self-Certification would not be required if there is only documented child support coming into the household, and it covers all expenses.

As discussed in **A6 and A18**, the only time a notarized Self-Certification must be used is after all other avenues to obtain income verification documentation have been exhausted. At that point, document the file by entering a written description of what avenues were taken on a Client Contact Log and include copies of all information sent to the client and their employer to request information. Per LIHEAP Service Delivery Guide, Section 3.6.C.2.d.v., Self-Certification must include *a notarized statement signed by the potential applicant indicating that the applicant has no other proof of income.*

**Q26: Some clients receive a utility reimbursement check and state that this is their only source of income. Do they still have to have a notarized statement?**

**A26:** No. As discussed in **A25**, you would not need a notarized statement regarding income for any client who receives a utility reimbursement, states this is their only source of income, and all household expenses are covered. They are still required to complete the Zero Income Statement Form for each adult household member. You can use this on a client's Zero Income Supplemental Form as funds they use to take care of their household expenses.

## **BENEFIT DETERMINATION**

**Q27: To determine the TEC, do you “exclude” an Environmental charge?**

**A27:** LHC has determined that the “Environmental Charge” is mandatory. Therefore, it should be **included** in determining the Monthly Total Energy Cost (TEC).

**Q28: In the draft that was put out in April 2021, it said LIHEAP will no longer pay gas bills for appliances. I haven’t noticed that wording in this service guide. So if they have both Electric and Gas, and they tell us Electric is their main heating source, are we allowed to input the Gas bill or not as of February 1st?**

**A28:** LHC has determined gas bills that are **only** used for appliances **can be** used when determining the TEC in order to accurately reflect a client’s energy burden. Gas bills used only for appliances are considered a **secondary source of energy**; and therefore, cannot receive a benefit payment. Only the **primary source of heating or cooling the home** must receive the benefit payment.

*In the LIHEAP Service Delivery Guide, Section 4.1, it states: Any energy (or fuel) costs incurred to heat or cool a home can be considered when determining the TEC for a household. The primary source of energy for cooling is electricity which operates air conditioners and electric fans. The primary sources of energy (or fuel) for heating are natural gas or propane. Electricity may also be used for heating purposes.*

*Residential energy costs from more than one fuel source (energy vendor) must be added together to determine the TEC for a month. However, the costs for the different fuel sources must be no more than thirty (30) days old. For example, both natural gas and electricity are used to heat a home in the winter. The cost of the natural gas and the cost of the electricity should be added together to determine the TEC. To compute the TEC for households with prepaid utilities, the Subgrantee must use the **Prepaid Utility Calculation Worksheet (Appendix M)**.*

**Q29: If a customer purchases propane once per year, I understand why we should divide that amount by 12 months; however, I don't understand why we must determine a daily cost of fuel usage if a customer purchases fuel twice monthly during the winter months. They also use the fuel for cooking.**

**A29:** In order to calculate Cooling/Heating/Crisis benefits consistently, a universal method to determine an average monthly total energy cost for clients using prepaid utilities (such as propane or electricity) must be used. Louisiana is a State with varying and inconsistent seasons. Louisiana policies must be able to uniformly address the timing of all purchases.

**Q30: Do we pay the full amount of the utility bill or just the past due amount?**

**A30:** Per the LIHEAP Service Delivery Guide, Chapter 5, Section 5.1.C (Revised February 1, 2022), *the crisis benefit payment will cover only the amount of the disconnect notice, if the services have NOT been disconnected at the time of application. If utilities have been disconnected at the time of application, the total benefit requested should include all costs to connect or reconnect services, except any other non-energy related charges. To determine the amount of the crisis benefit payment exclude: tampering fees, NSF check amount and charges, deposits, and any other non-energy related charges.*

Funds received under the American Rescue Plan (ARP) Act of 2021 are the **only funds** you are allowed to pay past due amounts under unless specific guidance for future Supplemental Funds is received. Eligibility and benefit determination guidelines for ARP Act funds can be found in LIHEAP Notice LHP-2021-03.

**Q31: In the new guide, it does not state a client needs to pay the difference to avoid disconnection if the crisis benefit does not cover the total amount. Is this correct, or is the client required to pay the difference?**

**A31:** Yes, the file is required to have documentation to show how the crisis was resolved (i.e. services continued, services restored, equipment operating, etc.). This may include a payment plan with the utility vendor, payment by the client for the remaining balance, or payment using some other 3<sup>rd</sup> party funding (such as CSBG). A revision to the LIHEAP Service Delivery Guide, Chapter 5, Section 5.1.C was issued effective February 1, 2022.

**Q32: If we have a client whose lights have been off for longer than 30 days, what date do we use to calculate the TEC? Once a client gets their balance transferred to a new account number, we would use the TEC from the old account number in LES. But in this instance, the last bill with an energy charge will be too old and the only one we can use. What do we do?**

**A32:** In this instance, we recommend obtaining a recent statement from the vendor on letterhead dated within the last 30 days stating the total cost to restore services.

Per the LIHEAP Service Delivery Guide, Section 5.1.B, it states: *In the event a household is in transition, a Final Bill and proof of a new account, showing the total cost to restore services, should be used to provide assistance. The referenced bill should clearly state "Final Bill". A recent statement from the vendor, preferably on letterhead, within the past 30 days may be used to calculate a benefit payment.*

**Q33: If a household uses Propane for heating, and they are out of fuel and/or have 20% or less fuel in their tank, one vendor will not deliver fuel for whatever reason (no account, pass due bill, etc.) unless it is 100 gallons. This is a Crisis situation for the customer. How do we serve this household with the heating benefits? Do we use the cost of 100 gallons of fuel plus the state required leak test cost (since the company will not deliver less than 100 gallons)?**

**A33:** Yes, using the Prepaid Utility Calculation Worksheet (Appendix M), determine whether the client meets the requirements for heating and/or crisis benefits. LHC has determined the cost for the leak test should be included as an “energy related charge”, and it may be included in the TEC calculation. You would also calculate the crisis benefit amount using the estimated cost for delivery of 100 gallons.

**Q34: Not covering utility deposits is new for this funding allocation, and a big part of resolving crisis for a lot of clients. Why is this no longer included in resolving a crisis situation?**

**A34:** Any other fees or charges that are not directly related to a client's energy usage are not allowed to be included when calculating a client's energy burden. Deposits are not "directly related" to a client's energy burden and could be **refunded to the client** upon account closure rather than to the federal grant. Therefore, LHC has determined deposits are not an eligible cost when determining crisis benefit amounts. Subgrantees can use other program funds (i.e. CSBG, etc.) to assist clients with deposits if those funds are available.

**Q35: When it comes to resolving a crisis, would the client entering into an installment plan for the difference owed constitute being resolved?**

**A35:** Yes, if the client can provide proof of entering into an installment plan for the difference owed, LHC considers this as the client resolving the difference, so their services can continue and/or be restored.

Per LIHEAP Service Delivery Guide, Chapter 5, Section 5.1.C (Revised February 1, 2022), *if the client's maximum benefit amount is not enough to resolve the crisis, documentation must be provided confirming how the difference has been resolved to allow for services to continue or service restoration to occur.*

**Q36: Does the disconnect notice suffice as documentation of a crisis or is additional documentation required?**

**A36:** A disconnect, shut off, or final notice is required as documentation for Crisis Bill Payment Assistance. All acceptable forms of documentation for Crisis Bill Payment Assistance can be found in the LIHEAP Service Delivery Guide, Section 5.1 B. For Crisis Bill Payment Assistance, additional documentation is only required in the event of a Life-threatening crisis. Per LIHEAP Service Delivery Guide, Section 5.1 D:



- **Life-threatening crisis**—Service shall be delivered within **18 hours** from the date of the completed application.
  - If the **health or safety risk** is due to illness or medical need, clients must provide documentation verifying the health or safety risk.
  - If the **health or safety risk** is from extreme weather conditions, either heat or cold, the Subgrantee may document the emergency with a print-out of the weather advisory documenting the emergency by utilizing an internet weather advisory site.

**Please Note:** There are different forms of Crisis (Equipment Repair / Replacement Assistance, Disaster Relief Benefits, and Unforeseen Circumstances). Different forms of Crisis have different requirements. Subgrantees must also complete the LIHEAP Crisis Assistance Form (Appendix N).