PY2024 IHCDA EAP Operations and Policy Changes

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PURPOSE OF TRAINING

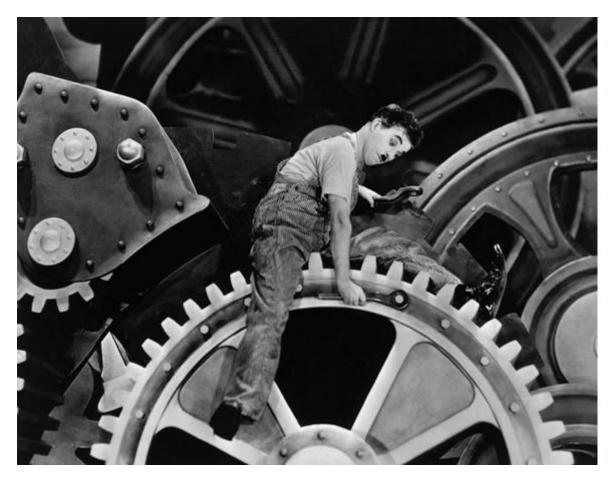
The purpose of this training is to provide a broad overview of this year's EAP operational design and to inform you of major policy changes.

AGENDA

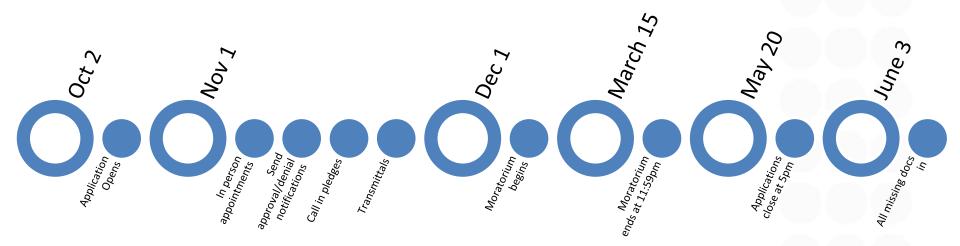
- 1. Operations Updates
- 2. Policy Changes
- 3. Changes to Forms



OPERATIONS UPDATES









Before the Program Year 2024 Officially Starts:

LSPs may distribute applications to their at-risk households beginning Monday, **August 14, 2023**.

LSPs may begin issuing **incomplete letters only** to applicants with incomplete applications upon determination of incomplete status, regardless of date.





Official start of federal program year is October 01, 2023.

Starting Monday October 02, 2023:

- LSPs may distribute applications to any non-at-risk households beginning
- The online application portal will open to all applicants
- LSPs who conduct in-person appointments may start setting those appointments, provided the appointments are set for no earlier than November 01, 2023.



The official start of the statewide Energy Assistance Program is Wednesday, **November 01, 2023**.

What can begin starting November 1?

- In-person appointments or taking walk-in crisis.
- Benefit approval and/or denial notification letters to applicants can be issued
- Verbal or written pledges to utility vendors or fuel providers can be made
- Transmittals can be sent to utility vendors or fuel providers.
- Crisis checks in-house to biofuel households in crisis and/or wood vouchers for households purchasing biofuel from a vendor with whom the LSP has an MOA can be issued
- Executed transmittals can be submitted to IHCDA Fiscal for payment.



Statewide utility shutoff moratorium begins Friday, December 01, 2023.

- Applicants are granted protection from utility disconnect by non-bulk fuel utility vendors upon successful submission of an application for energy assistance, until such time as household eligibility has been determined.
- LSPs must notify utility vendors of a household's application if they are aware that a household is facing an imminent disconnection and they are not able to immediately determine eligibility.
- Documentation of such notification in a client file will count as crisis mitigation.





- Notifying the vendor does not relieve the LSP of the responsibility to prioritize eligibility determination of households that are presenting with an energy crisis.
- Unless service is already disconnected and the benefit is insufficient to restore service, LSPs must waive the requirement for a client contribution during moratorium, because continued service is guaranteed by moratorium protection. LSPs may, however, encourage a client contribution.
- Vendors who indicate they do not intend to observe moratorium protection should be reminded of their legislative requirement to do so. If a vendor continues to indicate it will not observe moratorium, please escalate to IHCDA.



Statewide utility shutoff moratorium ends at 11:59pm on Friday, March 15, 2024.

- Utility vendors may disconnect households regardless of eligibility status, including households who were previously approved and who are now in arrears.
- LSPs may issue additional crisis to already-approved households who are now facing disconnect, pending availability of crisis funding.
- LSPs may require client contributions for new applicants if the eligible benefit is insufficient to provide continuing service.



Application deadline is 5:00pm Eastern time on Monday, May 20, 2024.

- EAPConnect will no longer accept application submissions after this time.
- Applicants may submit incomplete applications, but will have a hard deadline of returning missing documentation of June 03, 2024.





- All outstanding applications must have final eligibility determined and in either approved or denied status by Monday, **June 03**, **2024**.
- All outstanding transmittals must be submitted to IHCDA Fiscal by Monday, June 17, 2024.
- All vendors must be fully reconciled by Monday, July 01, 2024.
- The official closing date of federal program year 2024 is September 30, 2024.





QUESTIONS?



EAPCONNECT



EAPConnect is Roeing's web-based interface. All eligibility determination and client tracking must be performed and documented in EAPConnect.

IHCDA is working with Roeing to roll out some large-scale enhancements for EAPConnect in order to:

- improve efficiency
- user-friendliness
- and functionality

Roeing will train on these enhancements at a later date, once the enhancements are complete.



ONLINE APPLICATIONS

Applicants will continue to be able to apply 24 hours a day, 7 days a week, from any computer or internet-connected mobile device through the online portal.

LSPs will be responsible to:

- Regularly monitor the online application portal for new applications
 - Particularly for households in crisis
- To develop internal procedures to integrate online applications into their intake workflow

Online applicants are subject to the same rights and responsibilities as households who apply via any other method.



ONLINE APPLICATION LINK

All LSPs must provide a link to the online application portal on their website to facilitate equity of access.

This link shall lead applicants to http://eap.ihcda.in.gov.

Please ensure your website links to our landing page, and not directly to the application.



TELEPHONIC APPLICATIONS

IHCDA will continue to partner with Protiviti contractors working with the state's 2-1-1 service in order to provide telephonic access to submit an application.

The Protiviti contractors will submit an electronic applications through the portal on behalf of the applicant.

Because of the telephonic nature of the application, Protiviti contractors will not have access to an applicant's documents in order to upload them.





TELEPHONIC APPLICATIONS

Protiviti contractors will have a script instructing them to inform the applicant of their responsibility to submit documents to the LSP within 14 days.

The LSP must follow up with a formal incomplete letter, as would be required with an incomplete application submitted via any other method.

Telephonic applicants, like online applicants, are subject to the same rights and responsibilities as households who apply via any other method.



SUBGRANTEE AGREEMENTS

We are currently projecting being able to provide carryover funds to all LSPs in order to begin PY2024 operations. Therefore, you should be able to submit grantee payment claims and transmittals immediately upon the beginning of the program year.

We currently have no insight into when we might expect the first release of PY2024 funds, nor what the amount of our award might be this year.



VENDOR MOAS

This is an MOA year for EAP, so all utility and fuel partners will be completing an MOA and updating their contact and banking information, regardless of whether they have participated during PY 2022 and/or 2023 or not.

- If you are aware of a vendor in your area that has not yet signed an MOA with us, please have them contact <u>vendors@ihcda.in.gov</u> in order to have an MOA sent to them. We are trying to eliminate paper MOAs.
- IHCDA does not enter into MOAs with wood vendors or other biofuel providers. LSPs may develop their own MOAs in order to pay biofuel vendors directly using a voucher system.

More details about the Vendor MOAs in Thursday's Vendor session



TRANSMITTALS

- IHCDA asks that transmittals be sent to vendors electronically.
 - Avoid using regular mail to send transmittals, unless this is the only way a vendor can receive them.
 - Please ensure that you are notifying IHCDA of these exceptions.
- All claims must be transmitted to vendors within fourteen (14) calendar days of claim approval.
- All transmittals must be corrected and sent to IHCDA Fiscal within seven (7) calendar days of receipt of approval from vendor.
- IHCDA strongly encourages all LSPs to adhere to a weekly schedule at minimum for both transmittals and submission of signed transmittals to IHCDA Fiscal.



LSP EMAIL

Agencies are required to have an e-mail inbox where applicants can send questions, requests for information, and other correspondence. It is strongly urged, but not required, that agencies also use this e-mail for document or application submission.

IHCDA EMAIL

There is a generic e-mail for EAP. Agencies should use the IHCDA mailbox for general correspondence, questions about guidance, sending back budget modifications, questions, etc., rather than e-mailing the manager or analyst directly.

LIHEAP@IHCDA.IN.GOV



STATEWIDE APPLICATION

- New application forms will be made available to LSPs shortly. There will be minimal changes from last year's forms.
- IHCDA encourages fillable EAP applications to be made available.
- We will allow LSPs to fill out applications over the phone without obtaining a client signature, but notes must be made in the Statewide database.
- Must have the subgrantee's logo and contact information at the top. At a minimum, this must include address and phone number, and e-mail address.





The LSP must make a timely and accurate determination of the household's eligibility for benefits within the timeline below:

For appointments: Fourteen (14) calendar days of the application's completion.

For mail-ins: Fifty-five (55) calendar days of received date. The time frame starts November 1.

• Any application received before November 1, 2023 would have to be processed within 55 calendar days of November 1, or December 26.



DATES

Received date: The date an application is received by the LSP.

LSPs must date stamp all incoming mail-in applications when received.

These applications should be processed on a firstreceived, first-serve basis, crisis notwithstanding.





DATES IN EAPCONNECT

Application Date: the date stamp of the application.

Application Entered: the day that the application was entered into the database.

Completion date: The day that the application was completed. This will be mandatory when the client has a claim pending.

| Application | Household | Members | Income | Dwelling | Benefits | Status | Crisis | Claims | Documents | Reports | 5 | | | |
|----------------------------|-----------|---------|-----------|----------|----------|--------|--------|--------|-----------|---------|---------|--|--|--|
| | | | | | | | | | | | | | | |
| Application Date | | | | 8/1/2020 | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| Application Entered Date | | | 8/23/2020 | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| Application Completed Date | | | 8/23/2020 | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| Application Taken | | | Online | | | | | | | | | | | |
| | | | | | | | | | | | | | | |
| Site if not Of | fice | | | | | | | | | | | | | |
| Site if not Of | fice | | | | | | | | | | | | | |



CLOSED ACCOUNTS

- An EAP benefit can be applied to a closed account if the client received the pledge or benefit before the account was closed.
- An EAP benefit cannot be applied if the funds are pledged or transmitted to the vendor after the client has closed the account.
- Vendors may not apply EAP benefits to closed accounts with an outstanding balance.
- Benefits may only be awarded to accounts that are scheduled for closure or in "final bill" status if such a benefit will result in the account being reinstated and service continued at the address of record.



CLOSED ACCOUNT EXAMPLE

A client closed an electric account and declared bankruptcy after submitting a mail-in application.

The LSP transmitted a benefit five (5) days after the account was closed.

The utility vendor didn't catch that the account was closed when checking the transmittal and the transmittal was approved.

When the funds were paid to the utility vendor, it applied the funds to the outstanding balance.

The vendor should have rejected the benefit on the transmittal. If it got through the transmittal process and was paid out, the vendor will have to send the entire benefit back to IHCDA.



INDIVIDUAL CHECKS

- LSPs should make every effort to have clients who receive a direct payment benefit sign up for ACH/Direct Deposit, or to waive their direct benefit to a utility that they pay separately.
- IHCDA's banking institution will continue to print and mail the checks and initiate direct deposits.
- If a biofuel client is in crisis and needs an immediate benefit, and the LSP does not enter into MOAs with biofuel vendors, the LSP should issue the client an immediate crisis benefit and submit a claim for reimbursement. The LSP must include a list of clients who received a crisis benefit with the claim submission.
- For clients who have utilities included in their rent, the threshold of monthly rent paid required in order to be eligible for a benefit is \$1.00.



HOUSEHOLD ELIGIBILITY VS. BENEFIT ELIGIBILITY

If a household has a circumstance that is preventing the awarding of a benefit (e.g., inoperable equipment, outstanding deposit on account, etc.), this **does not** impact the determination of overall household eligibility.

- Intake staff must take care to distinguish between household eligibility and benefit eligibility.
- Household eligibility may be used to determine eligibility for other resources and can qualify households for moratorium protection.
- When household resolves issues preventing benefit payment, household eligibility must not be redetermined.
- Households **must not be denied** on the basis of not submitting utility bill documentation.



LSP ADMINISTRATION

For PY2024, the Administrative line item in LSP budgets is unchanged from last year's level of 7.5%.

For PY2024, the Outreach and Eligibility Determination line item is unchanged from last year's level of 4.5% of total award.

These will be reviewed in greater detail in another module.







The Low-Income Home Water Assistance Program (LIHWAP) is no longer active.

All references to LIHWAP have been removed from application material, websites, and manuals.

If you find a reference that we missed, please bring it to our attention so that we may address it.

Thank you for all the work you did the last few years to provide water assistance to Hoosiers!

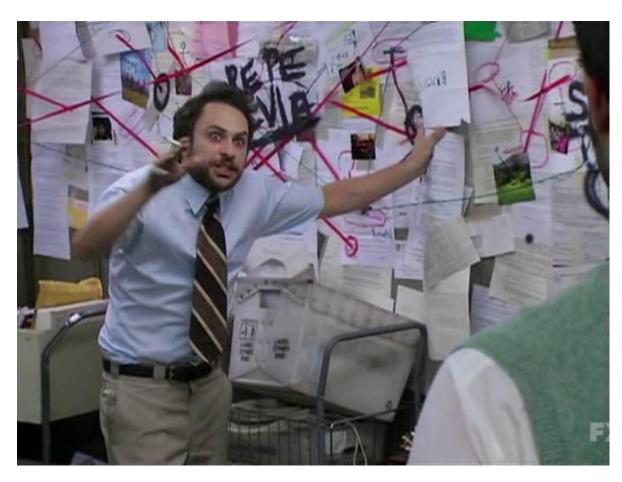




QUESTIONS?



POLICY CHANGES





APPLICATION AND FORM SUBMISSIONS

- An application form may only be signed and submitted by a household member or a person legally authorized to sign on a person's behalf (e.g., a power of attorney).
 - If a third party is signing/submitting on a household's behalf, documentation of legal authority is required.
- This applies to physical paper applications as well as online submissions.
 - This does not apply to telephonic applications, in which LSP intake staff or Protiviti staff are obtaining verbal consent to the terms of the certification statement.
- This applies not just to applications but to all supporting documentation and forms.
- Intake must take care to check signatures on submitted documents.



SIMPLIFIED RECERTIFICATION

- The Simplified Recertification policy has been removed from the PY2024 manual, and the Simplified Recertification form is no longer included in the forms and appendices.
- IHCDA will explore whether simplified recertification could be reintroduced in the future, but will only do so if it can be shown to reduce burden meaningfully for both applicants and for intake staff.



REGULAR BENEFIT CHANGES

• None this year!



CRISIS BENEFIT CHANGES

Beginning in PY2024, outstanding arrearages that are being managed with a payment arrangement/agreement/extension are eligible for crisis assistance, whether the applicant is current with their agreement or not.

- Encouraging an applicant to enroll in a payment arrangement, or helping them negotiate a payment arrangement, remains an acceptable method for crisis mitigation. However, we now will be able to assist them with additional funding rather than "kicking the can" on the outstanding balance.
- The maximum crisis amount per household remains set at \$500 per utility/\$1,000 per household. Applicants who heat with an installed electric heating source may receive up to \$1,000 in crisis toward their electricity.
- Clients may still come back once after initial application approval to use any crisis funding not used at the time of approval.



INCOME CALCULATION AND ELIGIBILITY

 This year, income eligibility will continue to be based on 60% of State Median Income only. We will not switch over to 150% of Federal Poverty Guidelines once FPG outpaces SMI.

| HH size | 1 month | | 3 months | | 12 months | |
|---------|---------|-------|----------|--------|-----------|--------|
| 1 | \$ | 2,479 | ŝ | 7,438 | \$ | 29,755 |
| 2 | \$ | 3,242 | \$ | 9,727 | \$ | 38,911 |
| 3 | \$ | 4,005 | \$ | 12,016 | \$ | 48,067 |
| 4 | \$ | 4,768 | \$ | 14,305 | \$ | 57,223 |
| 5 | \$ | 5,531 | \$ | 16,594 | \$ | 66,378 |
| 6 | \$ | 6,294 | \$ | 18,883 | \$ | 75,534 |
| 7 | \$ | 6,437 | \$ | 19,312 | \$ | 77,251 |
| 8 | \$ | 6,580 | ŝ | 19,741 | \$ | 78,967 |
| 9 | \$ | 6,723 | \$ | 20,171 | \$ | 80,684 |
| 10 | \$ | 6,866 | \$ | 20,600 | \$ | 82,401 |
| | | | | | | |

• The most recent SMI for a household of four is \$95,373.



WOOD AND BIOFUELS

 Due to concerns about health and safety, Kerosene is no longer considered a safe indoor residential heating fuel and is not eligible for EAP benefits.





ERR CHANGES

- ERR cap has been changed to a \$7,000 Average Cost per Unit (ACPU) rather than compelling agencies to choose between an ACPU and a strict per-household cap. LSPs may still choose to enforce the ACPU through implementing a strict per-household cap, but are strongly encouraged to allow themselves flexibility for addressing more complex and costly situations.
- The ERR eligibility period has been extended to cover the entire application period.
- ERR work may not begin prior to November 01, but LSPs may begin doing preparatory work, including the completion of consent forms and assessments, before November 01.



- Emergency Services benefits may be awarded when an applicant experiences increased usage of a utility as a result of an emergency event.
- The emergency event may be a natural disaster, extreme cold weather conditions, or a documented medical emergency explicitly requiring the use of electrical medical equipment in the home.



- Natural disasters must be documented through a declaration of emergency from an elected municipal, county, state, or national official.
- Qualifying extreme cold weather conditions may be documented through a severe weather alert issued by the National Weather Service or an appropriate state, county, or municipal official.
 - Note that this specifically relates to extreme weather conditions causing health and safety concerns, and not to travel advisories or restrictions related to snowfall or ice accumulation.



- Medical emergencies may be documented by a documentation of a medical event and the need to maintain home medical equipment from a medical professional.
 - Note that maintenance of previously existing chronic medical conditions does not in itself qualify as an emergency event for this benefit.
- Emergency Services funds may be awarded within 30 days of the documented emergency event or the expiration of a declaration of a state of emergency.
- The applicant must provide a rationale for how the emergency event led to increased usage, and the LSP is to document this in the case file.



Because the benefit is focused on increased usage, the LSP must ensure they
use a billing statement showing usage during the event, that is within thirty (30)
days of the event or the expiration of the state of emergency declaration, and
that they use only current usage to determine benefit amount.



MONITORING CHANGES

- Bonus points will no longer be awarded.
 - This is to make the EAP monitoring process similar to federal monitoring processes.
- The threshold for improvement plans is being adjusted.
- *Improvement plans are implemented at the discretion of the IHCDA EAP Program Manager.
 - An overall performance score of 85% or above will be considered "good standing."
 - An overall performance score of **80%-84.99%** will qualify an agency for participation in a Modified Quality Improvement Plan.
 - An overall performance score of **79.99% or below** will qualify an agency for participation in a Quality Improvement Plan.



UNUSUAL SITUATIONS? JUST ASK US!

Remember, the manual is intended to address the fundamental policies regarding EAP eligibility and the most common scenarios and issues subgrantees may encounter

- If intake or agency management encounters a situation that falls outside of the explicit guidance in this manual, they are encouraged to use the concepts contained in the manual and apply them to the specific situation.
- If the solution to the situation is still unclear, or if the subgrantee is unsure of their determination, they should reach out to IHCDA via the LIHEAP inbox for clarification.
- If we see similar questions coming up multiple times, it may alert us that there is a need, and we can work on a policy guidance or a future manual revision to address it.





QUESTIONS?



CHANGES TO FORMS





LIST OF APPENDICES

Appendix A

Appendix B

Appendix C

Appendix D

Appendix E

Appendix F

List of Manual Changes

Local Service Providers (LSPs)

IHCDA Community Programs Contacts

Federal LIHEAP Statute

Indiana Moratorium Legislation

Income Calculation Quick Reference Chart



LIST OF FORMS

Form ABS-2024 Form ADDR-2024 Form APPL-2024 Form DBPE-2024 Form DIS-2024 Form DWD-2024

Form EARN-2024 Form EBTR-2024 Form ERRCHECK-2024 Form ERRCON-2024

Form IVA-2024 Form LLA-2024 Form MTRX-2024 Form UFACCT-2024 Form UTIL-2024

Declaration of Absent Household Members Address Change Form EAP and Water Program Application Form **Direct Benefit Payment Election Form Disability Medical Statement** Department of Workforce Development Release of Information **Request for Earnings Information Energy Benefit Transfer Request Emergency Repair and Replace Checklist** Emergency Repair and Replace Consent/Release of **Liability Form** Income Verification Affidavit Landlord Affidavit **EAP Benefit Matrix Form** Request for Utility/Fuel Account Information **Utility Affidavit**



CHANGES/UPDATES TO FORMS

- All forms and appendices have been updated and renamed. Many forms have had minor changes to them, especially with the end of LIHWAP and enhanced federal reporting requirements.
- All LSPs should be sure to remove previous versions of forms and appendices from their websites and internal archives, and recycle any existing hard copies of these forms. Please ensure only 2024 forms are being used this year.



CHANGES/UPDATES TO FORMS

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App Key Number: _____

- A new form has been introduced: Form UFACCT – Request for Utility/Fuel Account Information.
- This form can be used to retrieve necessary fuel/utility account information when the applicant is unable to provide an account statement, or when the utility's account statement does not provide the necessary information.

Request for Utility/Fuel Account Information

| Applicant name: | | | Application date: |
|-----------------|--------|------|------------------------|
| Address: | | | Phone: |
| City: | State: | Zip: | Utility/fuel provider: |

I hereby authorize my Utility/fuel provider to release the information below to the requesting agency.

Applicant Signature

Date

To be Completed by Utility/Fuel Provider ONLY

| Utility/fuel type: | □Electric □Natural G | as □Propane □Fuel Oil | □Other |
|-----------------------------------------------------------------------|-----------------------------|------------------------------------------------------------------------------------------|-----------------------------|
| Billing name: | | | |
| Service/Delivery Address: | | | |
| Account Number: | | | |
| Account type: | □Residential □Commercial | Single-site or multi-site account? | ☐Single site ☐Multi-site |
| Total amount due/ account balance as of application date above: | | Ls any portion of account balance a deposit or other unallowable cost? | □No □Yes: |
| Is the account scheduled for disconnection? | □Yes □No | If yes, scheduled disconnection date and amount needed to cancel disconnection? | Date: D/C Amount: |

All Contact Information for utility/fuel provider representative REQUIRED

| Printed name of individual completing form: | Job title of individual completing form: |
|---------------------------------------------|------------------------------------------|
| Signature of individual completing form: | Date: |
| Business telephone/extension: | Business e-mail: |

Please return this completed form to the requesting agency:

Address:

E-mail address: ______ or Fax number: _____

Revised 2023.06.08



CHANGES/UPDATES TO FORMS

 The Form IVA – Income Verification Affidavit has been redesigned to make it easier to use. IHCDA hopes this results in less follow-up with applicants. Energy Assistance Program Income Verification Affidavit This form is to be completed by anyone claiming zero income or undocumented income for any of the three months preceding application. This form must be completed in its entirety.

Household Member: ______ Application Key: ______ Application Date: ______

Section 1: Please enter the amount of income received for which you do not have any documentation. Please write the year below the month. Use gross amounts. Enter zero (0) if you did not neceive income for a given month. If you enter 0 for any month, you must complete section 2. Any misrepresentation or omission may result in your application being invalidated.

The source of my income is:

| \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ | \$ |
|-----|-----|-----|-----|-----|------|------|-----|------|-----|-----|-----|
| Jan | Feb | Mar | Apr | May | June | July | Aug | Sept | Oct | Nov | Dec |
| 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 | 20 |

(Income includes but is not limited tra: wages, self-employment, odd jobs, salaries, commissions/bonuses, profit sharing, vacation/sick pay, tips, pensions, disability payments, dividends, interest, gambling winnings, military pay, insurance payments, workers compensation, unemployment or strike benefits, and royalties.)

Section 2: Please explain how you were able to pay the following expenses, if claiming zero income for <u>any</u> of the past 3 months. YOU MUST COMPLETE THIS SECTION IN FULL IF YOU INDICATED ANY MONTHS OF ZERO INCOME IN SECTION 1. CHECK ALL THAT APPLY, AT LEAST ONE ITEM FOR EACH CATEGORY.

P

| Rent/Mortgage | Utilities | Food | Other Household Expenses |
|--------------------------------|--------------------------------|---------------------------|--------------------------|
| Housing Support/voucher | Included in rent | SNAP/WIC benefits | Assistance program: |
| Assistance program: | Assistance program: | Food bank/food pantry | |
| | | Assistance program: | Family/friend paid for m |
| Have not paid/am <u>behind</u> | Have not paid/am <u>behind</u> | | Family/friend lent/gave |
| Family/friend paid for me | Family/friend paid for me | Family/friend paid for me | me money |
| Family/friend lent/gave | Family/friend lent/gave | Family/friend lent/gave | Amount: \$ |
| me money | me money | me <u>money</u> | |
| Amount: \$ | Amount: \$ | Amount: \$ | |

I acknowledge that 18 U.S.C. § 1001, "Fraud and Fake Statements," provides among other things, in any matter within the jurisdition of the executive, legislative, or judied branch of the Government of the United States, anyone who howingly and willfully. (1) faithers, concreals, or cover use by any trick, scheme, or device a material fract; (2) makes any materially false, fictitious, or fraudulent statement or representation; or (3) makes or uses any false writing or document knowing the same to contain any materially false, fictitious, or fraudulent statement or entry; shall be fined under this the, and/or imprisoned for not longer than five (3) years. Learly that the information provided is true and correct. Londerstand that by giving false information on this form 1 am subject to criminal penalties pursuant to (35:43-5-1, jauthorize state and federal agencies to verify any of this information and hereby consent to the release of my indiant a Tak eturn for this purpose.

Signature of Zero Income Applicant
Date
NOTARY ACKNOWLEDGEMENT (Use for Weatherization Assistance Program Referral ONLY)
WITNESS my hand and seal this _____day of _____20____.
County of Residence: ______Notary Public – Signature ______
Commission Expires: Notary Public - Printed Name

Revised 2023.07.06





QUESTIONS?

