LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)

State of Louisiana
Detailed Model State Plan

Fiscal Year 2020
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DETAILED MODEL PLAN (LIHEAP)

Program Name: Low Income Home Energy Assistance
Grantee Name: LOUISIANA
Report Name: DETAILED MODEL PLAN (LIHEAP)
Report Period: 10/01/2019 to 09/30/2020
Report Status: Submission Accepted by CO

Report Sections

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## Mandatory Grant Application SF-424

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

**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:**

<table>
<thead>
<tr>
<th>1.d. Version:</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Initial</td>
</tr>
<tr>
<td>- Resubmission</td>
</tr>
<tr>
<td>- Revision</td>
</tr>
<tr>
<td>- Update</td>
</tr>
</tbody>
</table>

2. **Date Received:**

3. **Applicant Identifier:**

4a. **Federal Entity Identifier:**

4b. **Federal Award Identifier:**

5. **Date Received By State:**

7. **APPLICANT INFORMATION**

* **a. Legal Name:** Louisiana Housing Corporation

**b. Employer/Taxpayer Identification Number (EIN/TIN):** 45-461902

**c. Organizational DUNS:** 078424719

* **d. Address:**

- **Street 1:** 2415 QUAIL DR
- **City:** BATON ROUGE
- **State:** LA
- **Country:** United States
- **ZIP / Postal Code:** 70808-

* **e. Organizational Unit:**

  **Department Name:** Energy Assistance

  **Division Name:**

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

  **Prefix:**
  - **First Name:** Lauren
  - **Middle Name:**
  - **Last Name:** Holmes

  **Suffix:**
  - **Title:** Program Administrator
  - **Organizational Affiliation:** Louisiana Housing Corporation

  **Telephone Number:** 225-754-1441

  **Fax Number:** 225-754-1469

  **Email:** lhartley@lhc.la.gov

* **8a. TYPE OF APPLICANT:**

  **A: State Government**

  **b. Additional Description:**

  **9. Name of Federal Agency:**

  **Catalog of Federal Domestic Assistance Number:** 93568

  **CFDA Title:** Low-Income Home Energy Assistance

11. **Descriptive Title of Applicant’s Project**

  Low-Income Home Energy Assistance Program

12. **Areas Affected by Funding:**

  State of Louisiana
13. CONGRESSIONAL DISTRICTS OF:

| a. Applicant | 06 |
| b. Program/Project: | LA-Statewide |

Attach an additional list of Program/Project Congressional Districts if needed.

14. FUNDING PERIOD:

| a. Start Date: 10/01/2019 |
| b. End Date: 09/30/2020 |
| a. Federal ($) | $0 |
| b. Match ($) | $0 |

15. ESTIMATED FUNDING:

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 |
| 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

Explain:

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 |
| 18b. Signature of Authorized Certifying Official |
| 18c. Telephone (area code, number and extension) |
| 18d. Email Address |

| Lauren Holmes |
| 09/04/2019 |

Attach supporting documents as specified in agency instructions.
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.)

<table>
<thead>
<tr>
<th>Component</th>
<th>Start Date</th>
<th>End Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heating assistance</td>
<td>11/15/2019</td>
<td>03/15/2020</td>
</tr>
<tr>
<td>Cooling assistance</td>
<td>04/01/2020</td>
<td>09/30/2020</td>
</tr>
<tr>
<td>Crisis assistance</td>
<td>10/01/2019</td>
<td>09/30/2020</td>
</tr>
<tr>
<td>Weatherization assistance</td>
<td>07/01/2020</td>
<td>06/30/2021</td>
</tr>
</tbody>
</table>

Provide further explanation for the dates of operation, if necessary.

### Estimated Funding Allocation, 2604(C), 2605(k)(1), 2605(b)(9), 2605(b)(16) - Assurances 9 and 16

1.2 Estimate what amount of available LIHEAP funds will be used for each component that you will operate: The total of all percentages must add up to 100%.

<table>
<thead>
<tr>
<th>Component</th>
<th>Percentage (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heating assistance</td>
<td>25.00%</td>
</tr>
<tr>
<td>Cooling assistance</td>
<td>37.50%</td>
</tr>
<tr>
<td>Crisis assistance</td>
<td>10.00%</td>
</tr>
<tr>
<td>Weatherization assistance</td>
<td>15.00%</td>
</tr>
<tr>
<td>Carryover to the following federal fiscal year</td>
<td>0.00%</td>
</tr>
<tr>
<td>Administrative and planning costs</td>
<td>10.00%</td>
</tr>
<tr>
<td>Services to reduce home energy needs including needs assessment (Assurance 16)</td>
<td>2.50%</td>
</tr>
<tr>
<td>Used to develop and implement leveraging activities</td>
<td>0.00%</td>
</tr>
</tbody>
</table>
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:) [ ]

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.

<table>
<thead>
<tr>
<th>Program Name</th>
<th>Heating</th>
<th>Cooling</th>
<th>Crisis</th>
<th>Weatherization</th>
</tr>
</thead>
<tbody>
<tr>
<td>TANF</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>SSI</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>SNAP</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Means-tested Veterans Programs</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
<tr>
<td>Other(Specify)</td>
<td>Yes</td>
<td>No</td>
<td>Yes</td>
<td>No</td>
</tr>
</tbody>
</table>

1.5 Do you automatically enroll households without a direct annual application? [ ] Yes [ ] No

If Yes, explain:

1.6 How do you ensure there is no difference in the treatment of categorically eligible households from those not receiving other public assistance when determining eligibility and benefit amounts?

SNAP Nominal Payments

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

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

1.7b Amount of Nominal Assistance: $0.00

1.7c Frequency of Assistance

- [ ] Once Per Year
- [ ] Once every five years
- [ ] Other - Describe:

1.7d How do you confirm that the household receiving a nominal payment has an energy cost or need?

Determination of Eligibility - Countable Income

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
<table>
<thead>
<tr>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unemployment insurance</td>
</tr>
<tr>
<td>Strike Pay</td>
</tr>
<tr>
<td>Social Security Administration (SSA) benefits</td>
</tr>
<tr>
<td>☑ Including MediCare deduction</td>
</tr>
<tr>
<td>☑ Excluding MediCare deduction</td>
</tr>
<tr>
<td>Supplemental Security Income (SSI)</td>
</tr>
<tr>
<td>☑ Retirement / pension benefits</td>
</tr>
<tr>
<td>General Assistance benefits</td>
</tr>
<tr>
<td>☑ Temporary Assistance for Needy Families (TANF) benefits</td>
</tr>
<tr>
<td>Supplemental Nutrition Assistance Program (SNAP) benefits</td>
</tr>
<tr>
<td>Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits</td>
</tr>
<tr>
<td>☑ Loans that need to be repaid</td>
</tr>
<tr>
<td>Cash gifts</td>
</tr>
<tr>
<td>Savings account balance</td>
</tr>
<tr>
<td>☑ One-time lump-sum payments, such as rebates/credits, winnings from lotteries, refund deposits, etc.</td>
</tr>
<tr>
<td>Jury duty compensation</td>
</tr>
<tr>
<td>☑ Rental income</td>
</tr>
<tr>
<td>Income from employment through Workforce Investment Act (WIA)</td>
</tr>
<tr>
<td>☑ Income from work study programs</td>
</tr>
<tr>
<td>Alimony</td>
</tr>
<tr>
<td>Child support</td>
</tr>
<tr>
<td>☑ Interest, dividends, or royalties</td>
</tr>
<tr>
<td>Commissions</td>
</tr>
<tr>
<td>Legal settlements</td>
</tr>
<tr>
<td>Insurance payments made directly to the insured</td>
</tr>
<tr>
<td>☑ Insurance payments made specifically for the repayment of a bill, debt, or estimate</td>
</tr>
<tr>
<td>Veterans Administration (VA) benefits</td>
</tr>
<tr>
<td>☑ Earned income of a child under the age of 18</td>
</tr>
</tbody>
</table>
- Balance of retirement, pension, or annuity accounts where funds cannot be withdrawn without a penalty.
- Income tax refunds
- Stipends from senior companion programs, such as VISTA
- Funds received by household for the care of a foster child
- Ameri-Corp Program payments for living allowances, earnings, and in-kind aid
- Reimbursements (for mileage, gas, lodging, meals, etc.)
- Other

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 2 - Heating Assistance

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

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

<table>
<thead>
<tr>
<th>Add</th>
<th>Household size</th>
<th>Eligibility Guideline</th>
<th>Eligibility Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>All Household Sizes</td>
<td>State Median Income</td>
<td>60.00%</td>
</tr>
</tbody>
</table>

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

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

Do you require an Assets test? ☐ Yes ☐ No

Do you have additional/differing eligibility policies for:

Renters? ☐ Yes ☐ No
Renters Living in subsidized housing? ☐ Yes ☐ No
Renters with utilities included in the rent? ☐ Yes ☐ No

Do you give priority in eligibility to:

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

Explanations of policies for each “yes” checked above:

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

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

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

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

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

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

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

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

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

☑ Income
☑ Family (household) size
2.6 Describe estimated benefit levels for FY 2020:

| Minimum Benefit | $150 | Maximum Benefit | $600 |

2.7 Do you provide in-kind (e.g., blankets, space heaters) and/or other forms of benefits? ☐ Yes  ☑ No

If yes, describe.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 3 - Cooling Assistance

Eligibility, 2605(c)(1)(A), 2605 (b)(2) - Assurance 2

3.1 Designate the income eligibility threshold used for the Cooling component:

<table>
<thead>
<tr>
<th>Add</th>
<th>Household size</th>
<th>Eligibility Guideline</th>
<th>Eligibility Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>All Household Sizes</td>
<td>State Median Income</td>
<td>60.00%</td>
</tr>
</tbody>
</table>

3.2 Do you have additional eligibility requirements for Cooling Assistance? ☐ Yes ☐ No

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

- Do you require an Assets test? ☐ Yes ☐ No
- Do you have additional/differing eligibility policies for:
  - Renters? ☐ Yes ☐ No
  - Renters Living in subsidized housing? ☐ Yes ☐ No
  - Renters with utilities included in the rent? ☐ Yes ☐ No
- Do you give priority in eligibility to:
  - Elderly? ☐ Yes ☐ No
  - Disabled? ☐ Yes ☐ No
  - Young children? ☐ Yes ☐ No
  - Households with high energy burdens? ☐ Yes ☐ No
  - Other? ☐ Yes ☐ No

Explanations of policies for each “yes” checked above:

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

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

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

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

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

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

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

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

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

☐ Income
3.6 Describe estimated benefit levels for FY 2020:

<table>
<thead>
<tr>
<th>Minimum Benefit</th>
<th>$150</th>
<th>Maximum Benefit</th>
<th>$600</th>
</tr>
</thead>
</table>

3.7 Do you provide in-kind (e.g., fans, air conditioners) and/or other forms of benefits?  
- [ ] Yes  
- [x] No

If yes, describe.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 4: CRISIS ASSISTANCE

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

4.1 Designate the income eligibility threshold used for the crisis component

<table>
<thead>
<tr>
<th>Add</th>
<th>Household size</th>
<th>Eligibility Guideline</th>
<th>Eligibility Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>All Household Sizes</td>
<td>State Median Income</td>
<td>60.00%</td>
</tr>
</tbody>
</table>

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

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

4.3 What constitutes a life-threatening crisis?

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

Crisis Requirement, 2604(c)

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

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

Crisis Eligibility, 2605(c)(1)(A)

4.6 Do you have additional eligibility requirements for CRISIS ASSISTANCE? Yes No

4.7 Check the appropriate boxes below and describe the policies for each

Do you require an Assets test? Yes No

Do you give priority in eligibility to:

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

In Order to receive crisis assistance:

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

- Yes
- No

**Other?**

- Yes
- No

**Do you have additional / differing eligibility policies for:**

- Renters?
  - Yes
  - No
- Renters living in subsidized housing?
  - Yes
  - No
- Renters with utilities included in the rent?
  - Yes
  - No

**Explanations of policies for each "yes" checked above:**

Eligible applicants are required to provide support documentation to establish a crisis situation. (i.e. Disconnect/Shut-Off Notice, Final Bill and proof of new account, doctor's statements or medical reports, written estimates to refill fuel tanks, and/or evidence of an economic hardship—monthly expenses and income).

**Determination of Benefits**

**4.8 How do you handle crisis situations?**

<table>
<thead>
<tr>
<th>Separate component</th>
<th>Fast Track</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Yes</td>
<td>- No</td>
</tr>
<tr>
<td>- Other - Describe:</td>
<td></td>
</tr>
</tbody>
</table>

- Disaster Relief

  LHC use of LIHEAP Funding for Disaster Relief is based on LIHEAP regulations at 45 C.F.R. 96.50(e).

  Allowable uses of LIHEAP funds to deal with crisis situations, particularly with respect to assistance for home energy related needs resulting from a hurricane or other natural disaster, include:

  - Costs to temporarily shelter or house individuals in hotels, apartments, or other living situations in which homes have been destroyed or damaged, i.e., placing people in settings to preserve health and safety and to move them away from the crisis situation.
  - Costs for transportation (such as cars, shuttles, buses) to move individuals away from the crisis area to shelters, when health and safety is a endangered by loss of access to heating or cooling.
  - Utility reconnection costs
  - Repair or replacement cost for furnaces and air conditioners
  - Insulation repair
  - Coats and blankets, as tangible benefits to keep individuals warm
  - Crisis payments for utilities and utility deposits
  - Purchase and installation of fans and air conditioners
  - Purchase and installation of generators

  All related activities must be pre-approved by LHC and will be targeted to areas covered by a disaster declaration.

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

<table>
<thead>
<tr>
<th>Separate component</th>
<th>Fast Track</th>
</tr>
</thead>
<tbody>
<tr>
<td>- Yes</td>
<td>- No</td>
</tr>
<tr>
<td>- Other - Describe:</td>
<td></td>
</tr>
</tbody>
</table>

Eligible households can receive only one crisis benefit payment, not to exceed $475, during a 12 month period.

For utility bill assistance, the crisis benefit payment will cover only the amount of the disconnect notice, if the services have NOT been disconnected at the time of application. If utilities have been disconnected at the time of application, the total benefit requested should include all costs to connect or reconnect services, except any other non-energy related charges.

In the event a household is in transition, a Final Bill and proof of a new account, showing the total cost to restore services, should be used to provide assistance and calculate the benefit. The referenced bill should clearly state "Final Bill". A recent statement from the vendor, preferably on letterhead, within the past 30 days may be used to calculate a benefit payment. The intent of this provision does not arbitrarily substitute the mandatory Disconnect Notice, or cause any inconsistency with the LHC's established policy for LIHEAP crisis assistance.

For equipment repair/replacement, the amount of the equipment plus installation, not to exceed $475 per household.

For disaster relief, the amount of the in-kind benefits, not to exceed $475 per household.
Crisis Requirements, 2604(c)

4.10 Do you accept applications for energy crisis assistance at sites that are geographically accessible to all households in the area to be served?

☐ Yes  ☐ No  Explain.

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

4.11 Do you provide individuals who are physically disabled the means to:

Submit applications for crisis benefits without leaving their homes?

☐ Yes  ☐ No  If No, explain.

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

☐ Yes  ☐ No  If No, explain.

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

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

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

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

<table>
<thead>
<tr>
<th>Crisis Type</th>
<th>Maximum Benefit</th>
</tr>
</thead>
<tbody>
<tr>
<td>Winter Crisis</td>
<td>$0.00</td>
</tr>
<tr>
<td>Summer Crisis</td>
<td>$0.00</td>
</tr>
<tr>
<td>Year-round Crisis</td>
<td>$475.00</td>
</tr>
</tbody>
</table>

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

☐ Yes  ☐ No  If yes, Describe

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

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

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

☐ Yes  ☐ No

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

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

<table>
<thead>
<tr>
<th></th>
<th>Winter Crisis</th>
<th>Summer Crisis</th>
<th>Year-round Crisis</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heating system repair</td>
<td>☐</td>
<td>☐</td>
<td>✔</td>
</tr>
<tr>
<td>Heating system replacement</td>
<td>☐</td>
<td>☐</td>
<td>✔</td>
</tr>
<tr>
<td>Cooling system repair</td>
<td>☐</td>
<td>☐</td>
<td>✔</td>
</tr>
<tr>
<td>Cooling system replacement</td>
<td>☐</td>
<td>☐</td>
<td>✔</td>
</tr>
<tr>
<td>Wood stove purchase</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Pellet stove purchase</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Solar panel(s)</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Utility poles / gas line hook-ups</td>
<td>☐</td>
<td>☐</td>
<td>☐</td>
</tr>
<tr>
<td>Other (Specify):</td>
<td>☐</td>
<td>☐</td>
<td>✔</td>
</tr>
</tbody>
</table>

Contractors may provide minor repair or replacement...
4.16 Do any of the utility vendors you work with enforce a moratorium on shut offs?

- Yes  - No

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

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

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

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 5: WEATHERIZATION ASSISTANCE

Eligibility, 2605(c)(1)(A), 2605(b)(2) - Assurance 2

5.1 Designate the income eligibility threshold used for the Weatherization component

<table>
<thead>
<tr>
<th>Add</th>
<th>Household Size</th>
<th>Eligibility Guideline</th>
<th>Eligibility Threshold</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>All Household Sizes</td>
<td>HHS Poverty Guidelines</td>
<td>200.00%</td>
</tr>
</tbody>
</table>

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

5.3 If yes, name the agency.

5.4 Is there a separate monitoring protocol for weatherization? Yes ☐ No ☑

WEATHERIZATION - Types of Rules

5.5 Under what rules do you administer LIHEAP weatherization? (Check only one.)

- [ ] Entirely under LIHEAP (not DOE) rules
- [ ] Entirely under DOE WAP (not LIHEAP) rules
- [ ] Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ (Check all that apply):
  - Income Threshold
  - Weatherization of entire multi-family housing structure is permitted if at least 66% of units (50% in 2- & 4-unit buildings) are eligible units or will become eligible within 180 days
  - Weatherize shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities).
- [ ] Other - Describe: 

- [ ] Mostly under DOE WAP rules, with the following LIHEAP rule(s) where LIHEAP and WAP rules differ (Check all that apply.)
- [ ] Income Threshold
- [ ] Weatherization not subject to DOE WAP maximum statewide average cost per dwelling unit.
- [ ] Weatherization measures are not subject to DOE Savings to Investment Ratio (SIR) standards.
- [ ] Other - Describe: 

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

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

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

5.7 Do you have additional/differing eligibility policies for:

- Renters Yes ☐ No ☑
- Renters living in subsidized housing Yes ☐ No ☑

5.8 Do you give priority in eligibility to:
### Benefit Levels

5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household? 
- **Yes**
- **No**

5.10 If yes, what is the maximum? 
- **$0**

### Types of Assistance, 2605(c)(1), (B) & (D)

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

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weatherization needs assessments/audits</td>
<td>Energy related roof repair</td>
</tr>
<tr>
<td>Caulking and insulation</td>
<td>Major appliance Repairs</td>
</tr>
<tr>
<td>Storm windows</td>
<td>Major appliance replacement</td>
</tr>
<tr>
<td>Furnace/heating system modifications/ repairs</td>
<td>Windows/sliding glass doors</td>
</tr>
<tr>
<td>Furnace replacement</td>
<td>Doors</td>
</tr>
<tr>
<td>Cooling system modifications/ repairs</td>
<td>Water Heater</td>
</tr>
<tr>
<td>Water conservation measures</td>
<td>Cooling system replacement</td>
</tr>
<tr>
<td>Compact florescent light bulbs</td>
<td>Other - Describe: Minor repairs (i.e., electrical problems, leaks, patching, thresholds, weatherstripping, switch/outlet gaskets, replace broken window panes, repair windows and doors, etc.)</td>
</tr>
</tbody>
</table>

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
### Section 6: Outreach, 2605(b)(3) - Assurance 3, 2605(c)(3)(A)

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.
- [x] Include inserts in energy vendor billings to inform individuals of the availability of all types of LIHEAP assistance.
- [ ] Mass mailing(s) to prior-year LIHEAP recipients.
- [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):
  - Presentations at community and school meetings. Off-site event for distribution (Housing conferences, seminars, churches, community centers, etc.)

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 7: Coordination, 2605(b)(4) - Assurance 4

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.).

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Joint application for multiple programs</td>
</tr>
<tr>
<td>✔</td>
<td>Intake referrals to/from other programs</td>
</tr>
<tr>
<td>✔</td>
<td>One-stop intake centers</td>
</tr>
<tr>
<td>✔</td>
<td>Other - Describe:</td>
</tr>
<tr>
<td></td>
<td>Participate in a state telephone call center (i.e. 211), which directs callers to LIHEAP providers.</td>
</tr>
</tbody>
</table>

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 8: Agency Designation, 2605(b)(6) - Assurance 6 (Required for state grantees and the Commonwealth of Puerto Rico)

8.1 How would you categorize the primary responsibility of your State agency?

- Administration Agency
- Commerce Agency
- Community Services Agency
- Energy / Environment Agency
- Housing Agency
- Welfare Agency
- Other - Describe:

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

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

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

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

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

8.5 LIHEAP Component Administration.

<table>
<thead>
<tr>
<th>Heating</th>
<th>Cooling</th>
<th>Crisis</th>
<th>Weatherization</th>
</tr>
</thead>
<tbody>
<tr>
<td>8.5a Who determines client eligibility?</td>
<td>Local County Government</td>
<td>Local County Government</td>
<td>Local County Government</td>
</tr>
<tr>
<td>Community Action Agencies</td>
<td>Community Action Agencies</td>
<td>Community Action Agencies</td>
<td>Community Action Agencies</td>
</tr>
<tr>
<td>Tribal Government</td>
<td>Tribal Government</td>
<td>Tribal Government</td>
<td>Tribal Government</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>8.5b Who processes benefit payments to gas and electric vendors?</th>
<th>State Housing Agency</th>
<th>State Housing Agency</th>
<th>State Housing Agency</th>
</tr>
</thead>
</table>
If any of your LIHEAP components are not centrally-administered by a state agency, you must complete questions 8.6, 8.7, 8.8, and, if applicable, 8.9.

8.6 What is your process for selecting local administering agencies?

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

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

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

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

8.7 How many local administering agencies do you use? 40

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

☐ Yes
☒ No

8.9 If so, why?

☐ Agency was in noncompliance with grantee requirements for LIHEAP -
☐ Agency is under criminal investigation
☐ Added agency
☐ Agency closed
☐ Other - describe

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 9: Energy Suppliers, 2605(b)(7) - Assurance 7

### 9.1 Do you make payments directly to home energy suppliers?

<table>
<thead>
<tr>
<th>Energy Type</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heating</td>
<td>![ ]</td>
<td>![ ]</td>
</tr>
<tr>
<td>Cooling</td>
<td>![ ]</td>
<td>![ ]</td>
</tr>
<tr>
<td>Crisis</td>
<td>![ ]</td>
<td>![ ]</td>
</tr>
</tbody>
</table>

If yes, Describe.

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

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

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

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

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

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

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

### 9.5. Do you make payments contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households?

<table>
<thead>
<tr>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
</table>

If so, describe the measures unregulated vendors may take.

Unregulated Energy Vendors are not included as LIHEAP energy providers.

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 10: Program, Fiscal Monitoring, and Audit, 2605(b)(10)

10.1. How do you ensure good fiscal accounting and tracking of LIHEAP funds?

The LHC financial operations manual establishes the framework and procedures for budgeting, reporting, internal controls, cost allocation, and accountability as described in the costs principle applicable to the grant.

Contractors submit weekly electronic copies of the Request for Payment to LHC for their benefit payments based on eligible households and monthly Request for Payment to LHC for actual administrative, program, and client education expenditures.

LHC conducts monthly reconciliation of funds and expenditures with sub-recipients to ensure accuracy and reliability for data reporting.

All LIHEAP expenditures are tracked and monitored using the web-based software, Hancock Energy Software (HES) and MS Excel spreadsheets.

Audit Process

10.2. Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A - 133?

Yes ☑️  No ☐

10.3. Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited fiscal year.

No Findings ☑

<table>
<thead>
<tr>
<th>Finding</th>
<th>Type</th>
<th>Brief Summary</th>
<th>Resolved?</th>
<th>Action Taken</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

10.4. Audits of Local Administering Agencies

What types of annual audit requirements do you have in place for local administering agencies/district offices? Select all that apply.

☑️ Local agencies/district offices are required to have an annual audit in compliance with Single Audit Act and OMB Circular A-133
☐ Local agencies/district offices are required to have an annual audit (other than A-133)
☑️ Local agencies/district offices’ A-133 or other independent audits are reviewed by Grantee as part of compliance process.
☑️ Grantee conducts fiscal and program monitoring of local agencies/district offices

Compliance Monitoring

10.5. Describe the Grantee’s strategies for monitoring compliance with the Grantee’s and Federal LIHEAP policies and procedures: Select all that apply

Grantee employees:

☑️ Internal program review
☑️ Departmental oversight
☑️ Secondary review of invoices and payments
☑️ Other program review mechanisms are in place. Describe:
LHC utilizes the available reporting system of the Hancock Energy Software (HES) to monitor contractor's production and service delivery to timely ensure all contractors are maintaining service delivery in accordance with contractual obligations.

Local Administering Agencies / District Offices:
- On-site evaluation
- Annual program review
- Monitoring through central database
- Desk reviews
- Client File Testing / Sampling
- Other program review mechanisms are in place. Describe:

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

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

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

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

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

(B) Compliance with Minimum Wage laws,

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

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

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

(F) Documentation of employee training on program guidelines,

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

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

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

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

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

Site Visits:

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

Desk Reviews:

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

10.8. How often is each local agency monitored?

All Contractors are monitored at least once annually.
<table>
<thead>
<tr>
<th>Question</th>
<th>Answer</th>
</tr>
</thead>
<tbody>
<tr>
<td>10.9. What is the combined error rate for eligibility determinations?</td>
<td>OPTIONAL</td>
</tr>
<tr>
<td>10.10. What is the combined error rate for benefit determinations?</td>
<td>OPTIONAL</td>
</tr>
<tr>
<td>10.11. How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues?</td>
<td>0</td>
</tr>
<tr>
<td>10.12. How many local agencies are currently on corrective action plans for financial accounting or administrative issues?</td>
<td>0</td>
</tr>
</tbody>
</table>

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 11: Timely and Meaningful Public Participation, 2605(b)(12), 2605(C)(2)

11.1 How did you obtain input from the public in the development of your LIHEAP plan?
Select all that apply.

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

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

*Revised Heating Season from 10/1 - 3/31 to 11/15 - 3/15 to correspond with Louisiana temperature patterns.

*Increased the percentage of funds used for the Weatherization component from 12% to 15%.

*Revised photocopied SSN card requirements for all household members.

*Allowed SNAP printout from the last 30 days to verify SSA and SSI income.

Public Hearings, 2605(a)(2) - For States and the Commonwealth of Puerto Rico Only

11.3 List the date and location(s) that you held public hearing(s) on the proposed use and distribution of your LIHEAP funds?

<table>
<thead>
<tr>
<th>Date</th>
<th>Event Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>08/07/19</td>
<td>Louisiana Housing Corporation, 2415 Quail Drive, Baton Rouge, LA 70808</td>
</tr>
</tbody>
</table>

11.4. How many parties commented on your plan at the hearing(s)? 4

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

*Subgrantees requested Grantee to add specifics to the Subgrantee Agreement to state the Grantee would abide by the same new Rules of Behavior requirements which were added to ensure client confidentiality and security of PII at a local level. (Will be incorporated with FY2020 Agreements.)

*Increased software reporting functionality for Subgrantee use. (Not related to Model Plan. New software version is being implemented this year which will allow for more reporting options.)

*Questions regarding the timelines for reporting fraud and Subgrantee responsibilities regarding fraud investigations and policy. (Timelines are fluid depending on the situation. Each Subgrantee should have a fraud policy to determine how fraud will be handled at a local level. This will be a topic that will be expanded on in the LA LIHEAP Service & Delivery Guide this coming year with Subgrantee input.)

*Benefit delivery issues due to requiring photocopied SSN cards for all household members, and inconsistencies between the LA LIHEAP Service & Delivery Guide allowing any government generated document containing the SSN to be substituted.
11.6 What changes did you make to your LIHEAP plan as a result of the comments received at the public hearing(s)?

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

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

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 12: Fair Hearings, 2605(b)(13) - Assurance 13

12.1 How many fair hearings did the grantee have in the prior Federal fiscal year? None

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

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

N/A

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

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

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

12.5 When and how are applicants informed of these rights?

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

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

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

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

12.7 When and how are applicants informed of these rights?

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

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 13 - Reduction of home energy needs, 2605(b)(16) - Assurance 16

| 13.1 Describe how you use LIHEAP funds to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance? |
| Energy education is provided to eligible and ineligible households. Local agencies are required to develop active, participatory energy conservation education activities. They are also encouraged to use educational activities that can be carried out while the applicant is waiting for intake. Services can include counseling, assistance with negotiations with energy vendors, outreach, referrals to the Weatherization Assistance Program, and energy efficiency education materials. |

| 13.2 How do you ensure that you don't use more than 5% of your LIHEAP funds for these activities? |
| A percentage is set in the State Plan and the amount is obligated upon receipt of the grant award. |

| 13.3 Describe the impact of such activities on the number of households served in the previous Federal fiscal year. |
| Assurance 16 funds were used to purchase energy kits, which included LED bulbs, energy calendars, energy wheels, and coloring books for children. Sub-grantees also purchased laptop computers, modems, scanners, televisions with built-in DVD players, and portable printers to deliver educational videos and serve clients in rural areas who are unable to travel to an office. LED night lights, weather stripping tape, advertisement spots and materials were also purchased to educate the public about the LIHEAP program including personnel time. LHC is estimating 45,436 households will benefit from Assurance 16 funds based on preliminary numbers received from Subgrantees this year. The LHC is currently working with sub-grantees to utilize FY 2019 Client Education funds prior to the end of the 09/30/2020. |

| 13.4 Describe the level of direct benefits provided to those households in the previous Federal fiscal year. |
| Assurance 16 funds were used to purchase energy kits, which included LED bulbs, energy calendars, energy wheels, and coloring books for children. |

| 13.5 How many households applied for these services? N/A |
| 13.6 How many households received these services? 45436 |

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 14: Leveraging Incentive Program, 2607(A)

14.1 Do you plan to submit an application for the leveraging incentive program?
- Yes
- No

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

14.3 For each type of resource and/or benefit to be leveraged in the upcoming year that will meet the requirements of 45 C.F.R. § 96.87(d)(2)(iii), describe the following:

<table>
<thead>
<tr>
<th>Resource</th>
<th>What is the type of resource or benefit?</th>
<th>What is the source(s) of the resource?</th>
<th>How will the resource be integrated and coordinated with LIHEAP?</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 15 - Training

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

a. Grantee Staff:
   - Formal training on grantee policies and procedures
     how often?
     - Annually
     - Biannually
     - As needed
     - Other - Describe:

   - Employees are provided with policy manual

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

b. Local Agencies:
   - Formal training conference
     - how often:
     - Annually
     - Biannually
     - As needed
     - Other - Describe:

   - On-site training
     - how often:
     - Annually
     - Biannually
     - As needed
     - Other - Describe:

   - Employees are provided with policy manual

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

c. Vendors
   - Formal training conference
     - how often:
     - Annually
     - Biannually
<table>
<thead>
<tr>
<th>Question</th>
<th>Yes</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td>15.2 Does your training program address fraud reporting and prevention?</td>
<td>☑️ Yes</td>
<td>☐ No</td>
</tr>
</tbody>
</table>

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 16: Performance Goals and Measures, 2605(b) - Required for States Only

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

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

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 17: Program Integrity, 2605(b)(10)

17.1 Fraud Reporting Mechanisms

a. Describe all mechanisms available to the public for reporting cases of suspected waste, fraud, and abuse. Select all that apply.

- Online Fraud Reporting
- Dedicated Fraud Reporting Hotline
- Report directly to local agency/district office or Grantee office
- Report to State Inspector General or Attorney General
- Forms and procedures in place for local agencies/district offices and vendors to report fraud, waste, and abuse
- Other - Describe:
  
  Posters, include information, as a part of advertising campaigns.

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

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

17.2 Identification Documentation Requirements

a. Indicate which of the following forms of identification are required or requested to be collected from LIHEAP applicants or their household members.

<table>
<thead>
<tr>
<th>Type of Identification Collected</th>
<th>Collected from Whom?</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Applicant Only</td>
</tr>
<tr>
<td>Social Security Card is photocopied and retained</td>
<td>Required</td>
</tr>
<tr>
<td>Social Security Number (Without actual Card)</td>
<td>Required</td>
</tr>
<tr>
<td>Government-issued identification card</td>
<td>Required</td>
</tr>
</tbody>
</table>
b. Describe any exceptions to the above policies.

A photocopy of the original Social Security Card is required for the Applicant only. Exceptions are made for any Applicant 60 years of age or older or Applicants with disabilities. Applicants who meet these exceptions (elderly and/or disabled) may substitute the photocopy of the original card with any federal or state government agency generated document containing the name, SSN, and other identifying information of the individual.

All other household members must provide a SSN by either the original Social Security card or with any federal or state government agency generated document containing the name, SSN, and other identifying information of the individual. Exceptions are made for any child born within the previous twelve months of application for which the SSA has not issued a SSN yet.

17.3 Identification Verification
Describe what methods are used to verify the authenticity of identification documents provided by clients or household members. Select all that apply

- Verify SSNs with Social Security Administration
- Match SSNs with death records from Social Security Administration or state agency
- Match SSNs with state eligibility/case management system (e.g., SNAP, TANF)
- Match with state Department of Labor system
- Match with state and/or federal corrections system
- Match with state child support system
- Verification using private software (e.g., The Work Number)
- In-person certification by staff (for tribal grantees only)
- Match SSN/Tribal ID number with tribal database or enrollment records (for tribal grantees only)

Verified SSN with the Social Security Administration means that either an original Social Security Card is used or an original document is used by a federal or state government agency which contains the name, SSN, and other identifying information of the individual and was verified by that federal or state government agency's means (i.e. SSA data match, Social Security card) was used.

Applicants are required to provide original Social Security cards. Exceptions are made for any Applicant 60 years of age or older or Applicants with disabilities. Applicants who meet these exceptions (elderly and/or disabled) may substitute the original card with any federal or state government agency generated document containing the name, SSN, and other identifying information of the individual.

All other Household members without a SSN verified with the Social Security Administration cannot be included on the LIHEAP application. Exceptions are made for any child born within the previous twelve months of application for which the SSA has not issued a SSN yet.

17.4. Citizenship/Legal Residency Verification
What are your procedures for ensuring that household members are U.S. citizens or aliens who are qualified to receive LIHEAP benefits? Select all that apply

- Clients sign an attestation of citizenship or legal residency
- Client’s submission of Social Security cards is accepted as proof of legal residency
- Noncitizens must provide documentation of immigration status
- Noncitizens must provide a copy of their birth certificate, naturalization papers, or passport
- Tribal members are verified through the SAVE system
- Other - Describe:
  Client's submission of an original document issued by a federal or state government agency with contains the name, SSN, or other identifying information of the individual and was verified by that federal or state government agency's means (i.e. SSA data match, Social Security card) is
17.5. Income Verification

What methods does your agency utilize to verify household income? Select all that apply.

- [ ] Require documentation of income for all adult household members
- [ ] Pay stubs
- [ ] Social Security award letters
- [ ] Bank statements
- [ ] Tax statements
- [ ] Zero-income statements
- [ ] Unemployment Insurance letters
- [ ] Other - Describe:
  
  Food Stamp (SNAP) certification letter or printout dated with 30 days of application date for verification of Social Security benefits.

- [ ] Computer data matches:
  - [ ] Income information matched against state computer system (e.g., SNAP, TANF)
  - [ ] Proof of unemployment benefits verified with state Department of Labor
  - [ ] Social Security income verified with SSA
  - [ ] Utilize state directory of new hires
  - [ ] Other - Describe:

17.6. Protection of Privacy and Confidentiality

Describe the financial and operating controls in place to protect client information against improper use or disclosure. Select all that apply.

- [ ] Policy in place prohibiting release of information without written consent
- [ ] Grantee LIHEAP database includes privacy/confidentiality safeguards
- [ ] Employee training on confidentiality for:
  - [ ] Grantee employees
  - [ ] Local agencies/district offices
- [ ] Employees must sign confidentiality agreement
  - [ ] Grantee employees
  - [ ] Local agencies/district offices
- [ ] Physical files are stored in a secure location
- [ ] Other - Describe:
  
  Beginning in FY2019, LHC requires all users of the LIHEAP Hancock software to sign a Rules of Behavior form which covers confidentiality and security of client information annually.

17.7. Verifying the Authenticity

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

- [ ] All vendors must register with the State/Tribe.
- [ ] All vendors must supply a valid SSN or TIN/W-9 form
- [ ] Vendors are verified through energy bills provided by the household
- [ ] Grantee and/or local agencies/district offices perform physical monitoring of vendors
- [ ] Other - Describe and note any exceptions to policies above:

17.8. Benefits Policy - Gas and Electric Utilities

What policies are in place to protect against fraud when making benefit payments to gas and electric utilities on behalf of clients? Select all that apply.
Applicants required to submit proof of physical residency

Applicants must submit current utility bill

Data exchange with utilities that verifies:

☐ Account ownership

☐ Consumption

☐ Balances

☐ Payment history

☐ Account is properly credited with benefit

☐ Other - Describe:

☐ Centralized computer system/database tracks payments to all utilities

☐ Centralized computer system automatically generates benefit level

☐ Separation of duties between intake and payment approval

☐ Payments coordinated among other energy assistance programs to avoid duplication of payments

☐ Payments to utilities and invoices from utilities are reviewed for accuracy

☐ Computer databases are periodically reviewed to verify accuracy and timeliness of payments made to utilities

☐ Direct payment to households are made in limited cases only

☐ Procedures are in place to require prompt refunds from utilities in cases of account closure

☐ Vendor agreements specify requirements selected above, and provide enforcement mechanism

☐ Other - Describe:

17.9. Benefits Policy - Bulk Fuel Vendors

What procedures are in place for averting fraud and improper payments when dealing with bulk fuel suppliers of heating oil, propane, wood, and other bulk fuel vendors? Select all that apply.

☐ Vendors are checked against an approved vendors list

☐ Centralized computer system/database is used to track payments to all vendors

☐ Clients are relied on for reports of non-delivery or partial delivery

☐ Two-party checks are issued naming client and vendor

☐ Direct payment to households are made in limited cases only

☐ Vendors are only paid once they provide a delivery receipt signed by the client

☐ Conduct monitoring of bulk fuel vendors

☐ Bulk fuel vendors are required to submit reports to the Grantee

☐ Vendor agreements specify requirements selected above, and provide enforcement mechanism

☐ Other - Describe:

17.10. Investigations and Prosecutions

Describe the Grantee’s procedures for investigating and prosecuting reports of fraud, and any sanctions placed on clients/staff/vendors found to have committed fraud. Select all that apply.

☐ Refer to state Inspector General

☐ Refer to local prosecutor or state Attorney General

☐ Refer to US DHHS Inspector General (including referral to OIG hotline)

☐ Local agencies/district offices or Grantee conduct investigation of fraud complaints from public

☐ Grantee attempts collection of improper payments. If so, describe the recoupment process

Overpayment or an ineligible payment made as a result of an error by the contractor shall be corrected immediately by notifying LHC of the error. The overpayment must be absorbed by the contractor. The contractor may appeal the cost of the overpayment or ineligible payment to the LHC.
Underpayment made as a result of an error by the contractor shall be corrected immediately by notifying LHC of the error. But if the payment was already made to the energy vendor, then the contractor has to pay the remaining costs.

Applicants who have received an overpayment or ineligible payment as a result of their failure to provide accurate or correct information, whether intentional or non-intentional, shall have the overpayment reversed on their energy accounts through the energy vendor.

When a contractor identifies an overpayment or ineligible payment due to applicant error, the contractor shall notify and provide support documentation to LHC. LHC will give the applicant an opportunity to dispute the finding prior to reversing the benefit through the energy vendor.

The applicant shall be advised of his or her right to appeal the reversing decision to LHC.

| Clients found to have committed fraud are banned from LIHEAP assistance. For how long is a household banned? | a minimum of 1 year |
| Contracts with local agencies require that employees found to have committed fraud are reprimanded and/or terminated |
| Vendors found to have committed fraud may no longer participate in LIHEAP |
| Other - Describe: |

If any of the above questions require further explanation or clarification that could not be made in the fields provided, attach a document with said explanation here.
Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters

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

Instructions for Certification

1. By signing and submitting this proposal, the prospective primary participant is providing the certification set out below.

2. The inability of a person to provide the certification required below will not necessarily result in denial of participation in this covered transaction. The prospective participant shall submit an explanation of why it cannot provide the certification set out below. The certification or explanation will be considered in connection with the department or agency’s determination whether to enter into this transaction. However, failure of the prospective primary participant to furnish a certification or an explanation shall disqualify such person from participation in this transaction.

3. The certification in this clause is a material representation of fact upon which reliance was placed when the department or agency determined to enter into this transaction. If it is later determined that the prospective primary participant knowingly rendered an erroneous certification, in addition to other remedies available to the Federal Government, the department or agency may terminate this transaction for cause or default.

4. The prospective primary participant shall provide immediate written notice to the department or agency to which this proposal is submitted if at any time the prospective primary participant learns that its certification was erroneous when submitted or has become erroneous by reason of changed circumstances.

5. The terms covered transaction, debarred, suspended, ineligible, lower tier covered transaction, participant, person, primary covered transaction, principal, proposal, and voluntarily excluded, as used in this clause, have the meanings set out in the Definitions and Coverage sections of the rules implementing Executive Order 12549. You may contact the department or agency to which this proposal is being submitted for assistance in obtaining a copy of those regulations.

6. The prospective primary participant agrees by submitting this proposal that, should the proposed covered transaction be entered into, it shall not knowingly enter into any lower tier covered transaction with a person who is proposed for debarment under 48 CFR part 9, subpart 9.4, debarred, suspended, declared ineligible, or voluntarily excluded from participation in this covered transaction, unless authorized by the department or agency entering into this transaction.

7. The prospective primary participant further agrees by submitting this proposal that it will include the clause titled “Certification Regarding Debarment, Suspension, Ineligibility and Voluntary Exclusion—Lower Tier Covered Transaction,” provided by the department or agency entering into this covered transaction, without modi...
fication, 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, 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 and 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.
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 iden...
8. Definitions of terms in the Nonprocurement Suspension and Debarment common rule and Drug-Free Workplace common rule apply to this certification. Grantees' attention is called, in particular, to the following definitions from these rules:

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

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

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

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

Certification Regarding Drug-Free Workplace Requirements

**Alternate I. (Grantees Other Than Individuals)**
The grantee certifies that it will or will continue to provide a drug-free workplace by:

(a) Publishing a statement notifying employees that the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance is prohibited in the grantee's workplace and specifying the actions that will be taken against employees for violation of such prohibition;
(b) Establishing an ongoing drug-free awareness program to inform employees about --
   (1) The dangers of drug abuse in the workplace;
   (2) The grantee's policy of maintaining a drug-free workplace;
   (3) Any available drug counseling, rehabilitation, and employee assistance programs; and
   (4) The penalties that may be imposed upon employees for drug abuse violations occurring in the workplace;
(c) Making it a requirement that each employee to be engaged in the performance of
the grant be given a copy of the statement required by paragraph (a);  
(d) Notifying the employee in the statement required by paragraph (a) that, as a condition of employment under the grant, the employee will --  
(1) Abide by the terms of the statement; and  
(2) Notify the employer in writing of his or her conviction for a violation of a criminal drug statute occurring in the workplace no later than five calendar days after such conviction;  
(e) Notifying the agency in writing, within ten calendar days after receiving notice under paragraph (d)(2) from an employee or otherwise receiving actual notice of such conviction. Employers of convicted employees must provide notice, including position title, to every grant officer or other designee on whose grant activity the convicted employee was working, unless the Federal agency has designated a central point for the receipt of such notices. Notice shall include the identification number(s) of each affected grant;  
(f) Taking one of the following actions, within 30 calendar days of receiving notice under paragraph (d)(2), with respect to any employee who is so convicted - (1) Taking appropriate personnel action against such an employee, up to and including termination, consistent with the requirements of the Rehabilitation Act of 1973, as amended; or  
(2) Requiring such employee to participate satisfactorily in a drug abuse assistance or rehabilitation program approved for such purposes by a Federal, State, or local health, law enforcement, or other appropriate agency;  
(g) Making a good faith effort to continue to maintain a drug-free workplace through implementation of paragraphs (a), (b), (c), (d), (e) and (f).  
(B) The grantee may insert in the space provided below the site(s) for the performance of work done in connection with the specific grant:

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

2415 Quail Drive  
* Address Line 1

Address Line 2

Address Line 3

Baton Rouge  
* City  
LA  
* State  
70808  
* Zip Code

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

Alternate II. (Grantees Who Are Individuals)

(a) The grantee certifies that, as a condition of the grant, he or she will not engage in the unlawful manufacture, distribution, dispensing, possession, or use of a controlled substance in conducting any activity with the grant;  
(b) If convicted of a criminal drug offense resulting from a violation occurring during the conduct of any grant activity, he or she will report the conviction, in writing, within 10 calendar days of the conviction, to every grant officer or other designee, un
less 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 transact
ion 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 ce 
rtification 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 und
er 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 or 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 p
provisions to assure that no household receiving assistance under this title will be treated adversely because of such assistance under applicable provisions of State law or public regulatory requirements; and

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

(8) provide assurances that,

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

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

(9) provide that--

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

(B) the State will pay from non-Federal sources the remaining costs of planning and administering the program assisted under this title and will not use Federal funds for such remaining cost (except for the costs of the activities described in paragraph (16));

(10) provide that such fiscal control and fund accounting procedures will be established as may be necessary to assure the proper 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.
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.

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

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

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

Dear Ms. Christopher:

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

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

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

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

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

Sincerely,

[Signature]

John Bel Edwards  
Governor

cc: Edselle Keith Cunningham, Jr., LHC Executive Director  
Loretta Wallace, LHC Program Administrator
DATE: September 18, 2018

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

AUTHORITY

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

DELEGATION

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

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

Edselle Keith Cunningham, Jr.
Executive Director
## Heating and Cooling - Benefit Matrix

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### Additional Payment to Targeted Priority Groups

Those household that contain one or more members of the targeted priority groups shall receive an additional payment of $100.00 Targeted priority groups are:
- Persons 60 years or older
- Persons who are disabled
- Persons five years of age and younger

Regardless of the number of priority members in one household, the household is eligible for only one additional $100 payment per household. *The maximum benefit will not exceed $600.00*
Louisiana Housing Corporation
FY2020 LIHEAP State Plan
Public Hearing

Wednesday, August 07, 2019
10:00 a.m.
2415 Quail Drive
Baton Rouge, LA 70809

<table>
<thead>
<tr>
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<tr>
<td>1  Rae Grimwade Davis</td>
<td>St. Mary CAA</td>
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<tr>
<td>2  Ayla A. Lane</td>
<td>St. Mary CAA</td>
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<tr>
<td>3  Sonya G. Alphonse</td>
<td>LaSalle CAA</td>
</tr>
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<td>4  United J. Franklin</td>
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<td>5  Jeffrey Beverly</td>
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<td>6  Athena Woods</td>
<td>CSBG State Office/LWC</td>
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<td>7  Chad Cailey</td>
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<td>8  Charli Boyd</td>
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<td>9  Judy H. McBeck</td>
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<td>10 DEBORA SAIK</td>
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<td>13 Vonda Whitehead</td>
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<td>14 Carol McCord</td>
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<td>18 Danita Brown</td>
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### FY2020 LIHEAP State Plan Public Hearing

**Date:** Wednesday, August 07, 2019  
**Time:** 10:00 a.m.  
**Location:** 2415 Quail Drive, Baton Rouge, LA 70809

<table>
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<tr>
<th>NAME</th>
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<tr>
<td>Shamell Lavigne</td>
<td>City of Baton Rouge/ OSS</td>
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<tr>
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<td>Demetrice Mercadel</td>
<td>Entergy/ N BO</td>
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<tr>
<td>Lauren Holmes</td>
<td>LHC</td>
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<tr>
<td>Tanesha Bell</td>
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LOUISIANA HOUSING CORPORATION
LIHEAP MEETING
Held on Wednesday, August 7, 2019
Louisiana Housing Corporation
2415 Quail Drive
Baton Rouge, Louisiana

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

****************************************************

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

LAUREN HOLMES
BRADLEY R. SWEAZY
EDSELLE KEITH CUNNINGHAM, JR.
ALMETRA FRANKLIN
DOROTHY OLIVER
LARRY ST. AMANT
HEATHER HUGHES
WALLACE SIBLEY
JEFF BEVERLY

REPORTED BY: KELLY S. PERRIN, CCR
MR. CUNNINGHAM:

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

So this is a public comment period. This is an opportunity for us to talk about how we intend to implement the LIHEAP plan in the 2020 year. So as we have opportunity to talk about the 2020 plan and improving the LIHEAP plan, we do want to make sure that we notice you to this. We want to hear these comments. And we want to be in a position to, if necessary, based on your comments come back together and have a final conversation where we demonstrate any adjustments made based on your comments today. So we probably, and I
haven't finalized this yet, it will be really based on what we've talked about today, we'll probably have another opportunity to come back and demonstrate to you all that we've heard your comments, that we've made whatever changes necessary in the State plan to mark those comments if we deem them necessary, appropriate, or within the confines of the law.

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

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

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

MS. HOLMES:

Okay. Great. Good morning.

(GOOD MORNING BY ALL)

MS. HOLMES:

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

Just some housekeeping items, if you have come in and you have not signed our sign-in sheet, please do so. We also have two handouts. One is very interesting. This is
our performance measure. It is our 2018
LIHEAP snapshot.

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

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

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

So we are looking as -- we continue as a
state to improve on our performance measures
and we are looking to be able to collect this
type of information each year to hopefully be able to rereview and improve on our benefit matrix in the coming one or two years.

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

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

If we can actually state to the clients that our heating program does not start until
November 15th, I think it's going to set more of an expectation level to the client of when we actually receive funds, and then that also gives LHC about two weeks to issue contracts out to the sub-grantees and to give them the opportunity to perform to be able to prepare for that amount coming.

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

Other than that, the cooling assistance is -- the cooling program is proposing to remain the same timeframe. Prices will continue as a 12-month program. And our weatherization program does not start until July 1 of the first year and will continue into the second year of the two-year grant in order to align with our DOE funding that we also receive.
We are also proposing this year, we did an evaluation of the heating and cooling days in the state. And up to this point, we have been -- it had been pretty close to an even split between heating assistance and cooling assistance on the State plans in the past.

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

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

LIHEAP does allow you to request an approval waiver to go over 15 percent. We are
looking to evaluate that in the coming years, but we wanted to increase the program to 15 percent this year to see -- to give our sub-grantees the opportunities to have the increased production and to gradually move their program forward and then also to see will it reevaluate in the coming years if we increase that or put in a waiver to DHHS for anything higher.

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

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

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

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

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

This past year as we were making programmatic changes, we did have a software limitation that did not allow us to remove the
previous six-month requirement where a client could only come in once every six months. We are in the process of -- we have -- are migrating our database over to the rest of the Hancock software that will be the benefit side of it. And we're currently using the administrative invoicing end this year.

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

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

Last year, we did move to the strict heating assistance heating season and cooling season; where in the past, we had operated what we called a noncrisis program where we offered benefits not tied to heating or cooling. By not tying them to the heating or cooling season, it did not enable us to track
what we were actually spending in heating or cooling assistance. And it also led us not being able to report accurately to DHHS on our performance measures.

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

Section 5.5 was a wording change where we had -- we went into a little bit more detail about how we combine DOE and LIHEAP funds. We said that in the State plan, we just combined them to maximize the effectiveness. We went into a little bit more detail about how we use those funds for incidental repairs to maximize the effectiveness of energy conservation.
measures with our DOE units.

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

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

We do not have a maximum benefit for the weatherization program. We have an average
cost per unit for the overall total of the units completed. What we were doing in Section 5 and 10 is we were putting in the average costs per unit as the maximum and reporting that to DHHS, which was inaccurate. We can spend higher than the average cost per unit as long as the total number of units come in below the average.

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

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

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

Section 8.5A, we did not have tribal
government in our heating, cooling, and crisis agencies that we offer -- that we contract with. We had Community Action Agencies. We had added last year our government offices that was not -- we noticed that had been missing. But we also contract with Clifton Choctaw Tribe out of Rapides Parish, and so we've added that in 8.5A to cover that tribe.

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

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

The reason with that is that also gives us some type of security to ensure that they are treating our clients the same fairly; that
they are not discriminating against them; that they are applying the benefit where the benefit belongs. We also -- that ACH also, if we can get them to sign up to that, we realize that some are smaller communities and that's not possible for them right now. But in the event that we are able to direct deposit, that also gets benefit to the client faster.

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

When we did a review of our 40 sub-grantees, we did not find that we have any corrective action plans within any of our agencies. Now we did have monitoring of findings and issues of concern that were being resolved, but there were not any corrective action plans, and we're very happy to report that. We have an excellent team here in this
Section 13.2, it was just a wording change to say that the percentages that we enter into with our sub-grantees are not budgeted, but they are obligated. Obligated means that we are basically committing that money contractually to our sub-grantees. That is a wording item that helps and is more along the language of DHHS in regards to obligation and expenditures.

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

We also updated our numbers for the estimated number of households that we are anticipating will receive the client education funds. We do not have final numbers right now. But based upon the agencies that we were able to come get some preliminary numbers
from, we were able to estimate that overall as a state.

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

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

I'm very happy to say this year that with the help of our vendors and our sub-grantees, we are able to report much earlier on our performance measures. Our LIHEAP annual
conference also brought to the attention of, not only LHC but our sub-grantees, some of the items that we needed to ensure that we were marking correctly when we took applications to make sure we were filling out those applications, because that information pulls into our performance measures.

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

Section 17 of the model plan is where we have to report to DHHS about our security guidelines and how we oversee fraud and report and handle fraud. One of the things we added into one of our measures in 17.6 was we implemented this year a LIHEAP Hancock software Rules of Behavior, where we require now all sub-grantees that have access to the LIHEAP software to sign a Rules of Behavior
stating that they will understand the confidentiality of the information; that they will not share that information; that they log out.

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

In Section 17.8, there are in the model plans check boxes for things that you can state that what the agency does and doesn't do as the grantee. One of the items that we did not have checked previously, but we do is computer databases are periodically reviewed to verify accuracy and timeliness of the payment made to the utility. So we can go back in to review where our accounting department is and where we, LHC as a whole,
are actually releasing payment to our vendor. So we do go back and we check that. We are always trying to improve. And that is one of the ways that we do that.

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

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

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

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

MS. HOLMES:

Yes.

MS. FRANKLIN:

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

MS. HOLMES:

Correct.

MS. FRANKLIN:

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

MS. HOLMES:
Yes.

MS. FRANKLIN:

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

MS. HOLMES:

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

MS. FRANKLIN:

I'm just thinking about, and many of our agencies alike, weatherization programs or
major programs, super circular for auditing purposes, they ask that when we are in partnership with another agency, we'd be able to show about the fidelity of the financial information and the client information we're providing. And it seems like, if we're going to provide you or have that available for you when we get our contract, we should have something attached to the contract saying that this is your procedure for fidelity of information for our agency, the information we're providing you with.

MS. HOLMES:

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

MS. FRANKLIN:

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

MR. CUNNINGHAM:

I think I understand what you're saying. So our fiduciary responsibility, our ability to hold that information secret and sacrosanct and beyond public disclosure is a part of our State responsibility.
MS. FRANKLIN:  
Okay.

MR. CUNNINGHAM:  
And so we have a series of networks and controls that make sure that we don't publish, that we don't accidentally disseminate. We have a control system through our technology, through our service provider.

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

MR. SWEAZY:  
You're talking about OTM?

MR. CUNNINGHAM:  
OTM.

MR. SWEAZY:  
Uh-huh.

MR. CUNNINGHAM:  
So we have procedures in place that we have to follow, we are required both by state law and federal law to protect the information. We can determine what document
will put you at ease. I understand your question.

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

MS. FRANKLIN:

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

MR. CUNNINGHAM:

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

MS. FRANKLIN:
Thank you.

MS. HOLMES:

Yes.

MS. FRANKLIN:

One more thing.

MS. HOLMES:

Yes.

MS. FRANKLIN:

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

MS. HOLMES:

I agree. One of the drawbacks to the current Hancock system is a reporting function that I have had that as an environment for
this new system that the reporting game has
got to be definitely upped a notched. So I am
still waiting to see what that looks like.
This report is produced by a third-party
entity that is contracted by DHHS, but they do
work with states individually.

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

MR. CUNNINGHAM:

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

MS. FRANKLIN:

Yeah, it will be helpful to us.
MR. CUNNINGHAM:

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

MS. FRANKLIN:

Okay.

MR. CUNNINGHAM:

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

MS. FRANKLIN:

Okay.

MR. CUNNINGHAM:

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

MS. FRANKLIN:

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

MR. CUNNINGHAM:

Oh, absolutely.

MS. FRANKLIN:

-- later.

MR. CUNNINGHAM:

Absolutely.
MS. FRANKLIN:

Yeah. Okay.

MR. CUNNINGHAM:

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

MS. FRANKLIN:

All right. Somebody else needs to...

MS. HOLMES:

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

MS. FRANKLIN:

Well, you know, just thinking, we're
entering the data to Hancock anyway --

MS. HOLMES:

   Right.

MS. FRANKLIN:

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

MS. HOLMES:

   Yes, it would probably take two minutes.

MS. FRANKLIN:

   All of our reports are computer driven anyway.

MS. HOLMES:

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

MS. OLIVER:

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

MS. HOLMES:

   The fraud -- LHC investigating that
fraud?

MS. OLIVER:

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

MS. HOLMES:

Right.

MS. OLIVER:

And then I send it to you.

MS. HOLMES:

Uh-huh.

MS. OLIVER:

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

MS. HOLMES:

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

MS. OLIVER:

Uh-huh.

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

MS. OLIVER:

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

MS. HOLMES:

Yes.

MS. OLIVER:

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

MS. HOLMES:

Yes. Yes.

MS. OLIVER:

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

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

MS. OLIVER:

Thank you.

MR. ST. AMANT:

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

MS. HOLMES:

Yes. We also have as a --

MS. OLIVER:

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

MS. HOLMES:

Yeah.
MR. ST. AMANT:

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

MS. HOLMES:

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

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

MS. FRANKLIN:
Not June 30th of this year, darling; right?

MS. HOLMES:

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

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

MR. SWEAZY:

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

MS. HOLMES:

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

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

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

MS. OLIVER:

Correct. Right.

MR. CUNNINGHAM:

That's what I heard.

MS. OLIVER:

I want to do what's legal.

MR. CUNNINGHAM:
Right. Right. And we do too. But I also want to do what's reasonable.

MS. OLIVER:
Yes.

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

MS. OLIVER:
Yeah. Uh-huh.

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

MS. OLIVER:
You've got some (indiscernible) that are --

(MULTIPLE SPEAKERS SPEAKING)

MR. CUNNINGHAM:

Don't I know it.

MS. HOLMES:

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

MS. FRANKLIN:

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

MR. CUNNINGHAM:
Right.

MS. HOLMES:

Right.

MS. FRANKLIN:

When they sign their name certifying the information --

MS. HOLMES:

Right.

MS. FRANKLIN:

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

MS. HOLMES:

Right.

MS. FRANKLIN:

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

MS. HOLMES:

No.

MS. FRANKLIN:

-- and I got to be going --

MR. CUNNINGHAM:

No.
MS. FRANKLIN:

-- and verifying stuff.

MS. HOLMES:

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

MR. CUNNINGHAM:

Every time.

MS. FRANKLIN:

Uh-huh.

MR. CUNNINGHAM:

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

MS. HOLMES:

Right.

MR. CUNNINGHAM:

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

MS. HOLMES:

Right.

MR. CUNNINGHAM:

So we require our partners, AG's office,
and the Inspector General and others. So I want y'all to see, we're making this an even concept and I want you guys to feel comfortable in the approach.

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

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

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

MS. OLIVER:
Yeah.

MS. HOLMES:
Now, of course, and I think this issue did come up this year, and this would be
something we could go in more depth about at our November conference but, you know, client fraud is a different thing also than employee fraud.

MS. OLIVER: Yeah.

MS. HOLMES: And if you have an occurrence of employee fraud, how you deal with your employee is also --

MS. OLIVER: Oh, yes.

MS. HOLMES: Yeah, so --

MS. FRANKLIN: Yeah, we know how to handle that.

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

Yes, ma'am?

MS. HUGHES: Hi, Heather Hughes with Quad Area, program director. I have three little things.

MS. HOLMES:
Okay.

MS. HUGHES:

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

MS. HOLMES:

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

MS. HUGHES:

Well, that was for ID cards.

MS. HOLMES:

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

MS. HUGHES:

But --

MS. HOLMES:

Uh-huh.

MS. HUGHES:

-- in the manual on Page 41 on the service and delivery guide, it says, any
government-generated document containing the
social security number of household members
may be substituted for the social security
card.

MS. HOLMES:

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

MR. CUNNINGHAM:

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

MS. OLIVER:

    Uh-huh. Right.

MR. CUNNINGHAM:

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

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

There is some conversation about how can we effectively do this and the timeline in which I tell -- and I'm just saying this, this isn't an ageism statement. A 70-year-old having to get another social security card in order to get their light bill paid, knowing how that system works because they had to get one, I'm concerned that that person's light
bill is going to be off by the time he gets that card.

MS. HOLMES:

Now, also in the 13 --

MR. CUNNINGHAM:

So I'm just --

MS. HUGHES:

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

MS. HOLMES:

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

I know that we can give -- the Section 8 Program gives a timeline where if somebody
hasn't been issued a social security card, like that two-month old, that there is some exceptions to that. So we can build some exceptions into this, and then we can also look at if we're talking about a 70-year-old and we can document the -- there are also some -- Section 8 also makes some exceptions for individuals that, you know, they didn't have birth certificates and it was written in the Bible and things like that. There are some exceptions to that.

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

MS. HUGHES:

I mean, because if it has to be verified with the Social Security Administration, with a letter from the Social Security Administration with their social security number on the top of the page, because there's a code behind that social security number. So if it's a, you know, the (indiscernible) or HI
individual, so we know the code to know, like if it's B, it's not their social security number. Would we be able to use that?

MS. HOLMES:

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

MR. SWEAZY:

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

MS. HOLMES:

Right.

MS. HUGHES:

Yes.

MR. SWEAZY:

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

MS. HUGHES:

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

MS. HOLMES:

Yeah.

MS. HUGHES:

So I can use those documents. I can use the food stamp printout. I can use any
state-generated document as of now. Just when a new manual comes out, am I correct?

MS. HOLMES:

Wait. Say that one more time for me.

MS. HUGHES:

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

MS. HOLMES:

Yes.

MS. HUGHES:

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

MS. HOLMES:

Yes.

MS. HUGHES:

-- of the household.

MS. HOLMES:

Well --

MS. HUGHES:

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

MS. HOLMES:

So the State plan though overrides the manual at --

MS. HUGHES:
Yes.

MS. HOLMES:

The State plan overrides the manual.

MS. HUGHES:

So we cannot --

MS. HOLMES:

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

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

MS. HUGHES:

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

MS. HOLMES:

Yeah. Okay.

MS. HUGHES:

Just for future, you know, reference.

MS. HOLMES:

Okay.

MS. HUGHES:

Also, the State plan does not allow
agencies to use a snap printout from the last
30 days to verify income for like social -- I
understand for, you know, income, working
income. But for social security, SSI, SSA,
that amount is on their snap printout. Can
we -- it's in the manual that we can use it;
can we? But it's not documented in the State
plan that we can.
MR. CUNNINGHAM:
So, look, we're at the point now where we
can -- let's understand this. I don't want to
tell you anything that we can't accomplish --
MS. HUGHES:
Okay.
MR. CUNNINGHAM:
-- and I don't want to hold you to a
standard that's unnecessary. What I want to
do is I want to do that final research noting
that this is an issue and noting that we'll be
able to come back and --
MS. OLIVER:
Right, come back.
MS. HOLMES:
Right. But it's -- if this is something
I need to incorporate in the State plan, I've
got to understand it.

MS. HUGHES:

Yeah.

MR. CUNNINGHAM:

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

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

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

Ms. Almetra?

MS. FRANKLIN:

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

MS. HOLMES:

Yes, ma'am.

MS. FRANKLIN:

All right.

MS. HOLMES:

Definitely.

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

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

MS. HOLMES:
Okay. Let's --

MS. HUGHES:
Table it?

MS. HOLMES:
Yeah. Yeah. Yeah, definitely.

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

And the State plan is like the constitution, it's a big deal. And there's a
lot of details in there that we have questions about, how it's going to be implemented, how it's going to be interpreted, blah, blah, blah.

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

When you talk about, for instance, getting a social security card for everybody, that sounds great on paper. All right. But if you look at an 86-year-old and say, you've got to have seven social security cards or I can't help you and walk out the front door, that's bad. And it's very difficult to spend the money if we don't come to these conclusions together.
Rules are great. But if they don't work, they're not great. So I suggest that we work on it together.

MS. FRANKLIN:

When is the State plan due?

MR. SIBLEY:

September 3rd.

MS. FRANKLIN:

Oh, okay. So we've got --

MR. SIBLEY:

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

MR. CUNNINGHAM:

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

MR. SWEAZY:

Well, let's make sure we meet the requirements of our State plan process too.

Everything that is being said is documented
and captured. But everything also, there should be -- everyone should point it out in writing, I would like for us to at least -- CSBG will (indiscernible) -- I'd like for us to at least hear the points that we have concerns with and then allow us at the next meeting or even before the next meeting that we give a response or a solution to each point.

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

So let's hit every point, every concern. And we don't have to say what we can do, how we can do it, let's don't worry about that. Let's get the points, what the issue is, and allow us then to work out a solution or provide a solution. And then we meet next week or the week after and then you can say, I don't like that or we do like that.
But that way, when we have the next public meeting about, this is our final, then we can go into more hashing out if we don't like it. At least this way, it allows us to take steps to get to it and each concern.

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

MR. BEVERLY:

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

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

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

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

So what we really need to be working on with our weatherization team members is defining what this state's policy is going to be in regards to what is a minor repair, what is a non-substantial rehab repair. So is that the square -- is that a square foot patch that's 2 feet by 3 feet? You know, the technical type end of it, so that is
definitely all is still on our horizon and in our discussion with all our weatherization team members.

    Thanks, Jeff. Anyone else?

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

    (WHEREUPON, THE MEETING ADJOURNED.)
REPORTER'S CERTIFICATE

I, KELLY S. PERRIN, a Certified Court Reporter, Certificate #23035, in good standing with the State of Louisiana, as the officer before whom this meeting was taken, do hereby certify that the foregoing 63 pages;

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