

**Section 1**

**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.)

		<u>Dates of Operation</u>	
<input checked="" type="checkbox"/>	Heating assistance	Start date: 10/01/2019	End date: 05/15/2020
<input type="checkbox"/>	Cooling assistance	Start date:	End date:
<input checked="" type="checkbox"/>	Crisis assistance	Start date: 10/01/2019	End date: 09/30/2020
<input checked="" type="checkbox"/>	Weatherization assistance	Start date: 07/01/2020	End date: 06/30/2021

**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%.**

61 % heating assistance

0 % cooling assistance

9 % crisis assistance

15 % weatherization assistance

5 % carryover to the following Federal fiscal year

10 % administrative and planning costs

0 % services to reduce home energy needs including needs assessment (Assurance 16)

0 % used to develop and implement leveraging activities

100 % **TOTAL**

**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
- Weatherization assistance
- Cooling assistance
- Other (specify): Continue to use for Crisis Assistance

**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

	Heating	Cooling	Crisis	Weatherization
SNAP				
TANF				
SSI				
Means-tested veteran’s program				
Other (Specify): Households entirely composed of persons receiving Supplemental Security Income (SSI), TANF, or Food Stamps (SNAP) in each of preceding three months from the date of application will be deemed a categorically eligible household.	X		X	X

**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?

All households at or below 60% of the state median income are eligible for benefits calculated in the same manner, regardless of whether there is a household member who receives categorical assistance or not. Households entirely composed of persons receiving Supplemental Security Income (SSI), TANF, or Food Stamps (SNAP) in **the**

**previous one month** from the date of application are deemed to be income eligible, i.e. the benefit for a categorically eligible household whose income exceeds the guidelines will be calculated using the maximum eligible income level.

### **SNAP Nominal Payments**

**1.7 a.** Do you allocate LIHEAP funds toward a nominal payment for SNAP clients?

Yes  No

**If you answered “Yes” to question 1.7s, you must provide a response to questions 1.7b, 1.7c, and 1.7d.**

**1.7.b** Amount of Minimal Assistance: \$ \_\_\_\_\_

**1.7.c** 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?

### **1.8** Determination of Eligibility – Countable Income

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 of the applicable forms of countable income used to determine a household’s income eligibility for LIHEAP.

- Wages  
 Self-employment income  
 Contract income  
 Payments from mortgage or sales contracts  
 Unemployment Insurance  
 Strike pay  
 Social Security Administration (SSA) benefits  
 Including MediCare deduction  Excluding MediCare deduction  
 Supplemental Security Income (SSI)  
 Retirement / pension benefits  
 General Assistance benefits  
 Temporary Assistance for Needy Families (TANF) benefits  
 Supplemental Nutrition Assistance Program (SNAP) benefits  
 Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits  
 Loans that need to be repaid  
 Cash gifts  
 Savings account balance  
 One-time lump-sum payments, such as rebates/credits, winnings from lotteries, refund deposits, etc.  
 Jury duty compensation  
 Rental income

- Income from employment through Workforce Investment Act (WIA)
- Income from work study programs
- Alimony
- Child support
- Interest, dividends, or royalties
- Commissions
- Legal settlements
- Insurance payments made directly to the insured
- Insurance payments made specifically for the repayment of a bill, debt, or estimate
- Veterans Administration (VA) benefits
- Earned income of a child under the age of 18
- Balance of retirement, pension, or annuity accounts where funds cannot be withdrawn without a penalty.
- Income tax refunds
- Stipends from senior companion programs, such as VISTA
- Funds received by household for the care of a foster child
- Ameri-Corp Program payments for living allowances, earnings, and in-kind aid.
- Reimbursements (for mileage, gas, lodging, meals, etc.)
- Other

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

**Section 2 - HEATING ASSISTANCE**

**Eligibility, 2605(b)(2) – Assurance 2**

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

2019 HHS poverty income level \_\_\_\_\_%

**OR**

FY 2020 state’s median income 60 %

**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.

- |  | <u>Yes</u>                          | <u>No</u>                           |
|--|-------------------------------------|-------------------------------------|
| ● Do you require an assets test?                             | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ● Do you have additional/differing eligibility policies for: |                                     |                                     |
| ● Renters?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ● Renters living in subsidized housing?                      | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ● Renters with utilities included in the rent?               | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ● Do you give priority in eligibility to:                    |                                     |                                     |
| ● Elderly?   | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ● Disabled?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ● Young children?  | <input checked="" type="checkbox"/> | <input type="checkbox"/>            |
| ● Households with high energy burdens?                       | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |
| ● Other?   | <input type="checkbox"/>            | <input checked="" type="checkbox"/> |

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

1. Renters with Utilities Included in the Rent, please see section 3.4.18

If the customer lives in a mobile home and owns the unit, indicate they are an owner even if they pay lot rent in a mobile home park.

Landlord and/or management company contact information is essential to Weatherization referrals. For all rental situations, agencies shall enter, in the system, the landlord or management company contact information. The landlord’s or management company name, address and phone number is required.

Workers shall not allow an application to deny if the customer does not provide landlord information within 30 days of the application date. Applications may need to be reinstated if denied incorrectly for not providing landlord information.

Customers are required to provide verification for the following payment methods and the means of verification must be indicated in HE+ System Notes:

- Rental payment includes energy in the monthly rent.

- Separate payment is made to the landlord, mobile home park owner...
- Do not pay

Verification may include, but not is limited to:

- Observation of utility allowance on Form 50059 or Form 50058
- Observation of a lease or rental agreement,
- Verbal contact with the landlord, or
- In some cases, the heating vendor can verify if heat is included.

*NOTE: Observation of previous years' information is not an acceptable form of verification and new verification must be obtained.*

*NOTE: For multi-unit buildings, the agency may obtain information from the landlord/management company verifying that all units have heat and/or electric included in rent, a separate payment is made to landlord, or are 'do not pay'. This verification may be used for all units within the building and must be obtained on an annual basis. The means of verification must be indicated in HE+ system notes.*

2. Priority in eligibility to elderly, disabled and households with young children, please see sections: 8.2.3, 4.2.4

### **8.2.3 Outreach**

- 1) Agencies are required to provide outreach services to maximize participation of eligible persons for WHEAP benefits. Outreach activities must target households with disabled persons, elderly persons, children under six years old, and persons working at low-wage jobs (working poor). The "outreach indicator" is a question on the paper and system application. See Section 3.4.4 for more information about the outreach indicator.
- 2) Agencies are required to prominently display the Home Energy Plus Weatherization/WHEAP Co-Branding Poster in the agency's main waiting area for WHEAP intake. WHEAP agencies shall also consider displaying the poster in intake workers' offices, outreach locations, and other appropriate areas.
- 3) Agencies are required to ensure that persons with limited English proficiency (LEP) have meaningful and equal access to benefits and services. The agency is required to provide spoken interpretation in addition to translated written publications as some individuals may not read English or other language. The agency must have a mechanism to communicate orally with people with LEP. Providing the Spanish version of the Home Energy Plus (HE+) Application is not fulfilling this policy requirement. If the applicant requires spoken communication and/or explanation in addition to the translated application, agencies shall ensure verbal interpretation is available.
- 4) Agencies are required to provide services to the disabled and impaired, including but not limited to assisting applicants with the completion of the application form, translation of material, interpretation services for deaf, and reading services for blind.
- 5) Agencies must establish HE+ application sites that are accessible to targeted households.

- 6) Agencies must comply with Federal Law and provide an alternate intake site separate from a site which administers W-2/TANF.
- 7) Agencies must provide assistance with the preparation and submittal of applications by persons who are homebound.
- 8) Agencies must arrange an early application period for persons in targeted groups and high-risk households.
- 9) Agencies are required to complete a Program Operations and Community Service Plan (POCS) Plan. The Division provided template is available on the HE+ public website under WHEAP Grantee Information. The goal of this plan is to provide agencies with a means to describe how the agency will conduct outreach, how they will identify and enroll eligible households in their communities, and explain how the agency will reach targeted households. The POCS Plan should indicate what other community resources/stakeholders play a role in this outreach effort and identify key stakeholders that the agency coordinates efforts/referrals with. In addition, the list should indicate the local agency's contact person and the resource services provided. The plan must be made available to the Division upon request.
- 10) Agencies may choose to subcontract with non-profit organizations that administer W-2/TANF as long as an alternate intake method is offered which does not require applicants to apply in person.
- 11) Agencies may establish interagency agreements with other low-income program offices to perform some of the outreach activities to targeted groups.

#### **4.2.4 Exceptions to the Crisis Benefit Limit**

The Division may grant an exception to the \$1,200 Crisis Assistance benefit limit for an applicant during a program year upon request by the local agency. Exceptions require an explanation from the agency as to why they wish to exceed this limit.

The following guidance applies to any crisis override request:

1. The agency should identify several of the following conditions to justify the request for an exception:
  - Household has met the minimum contribution requirement, or
  - Household faces an emergency (loss of heat) during the heating season, or
  - Household faces a loss of electrical service, which will create an emergency (loss of heat) during the heating season, or
  - During the past twelve (12) months the household has made payments toward the heating bills that represent more than 10% of household's annual gross income, or
  - Household contains a vulnerable individual (child under 6, verified disabled individual or individual 60 or older), or
  - The expected high temperatures for the next 72 hours will be below freezing (32° F), or
  - Other housing options do not exist for the household (no family, friends, or other resources are available), or

- The household has no other resources (savings or other assets) to draw upon, or
- Assisting with arrearage will help establish a payment plan the applicant will be able to meet, or help establish an account in their name. The proposed payment plan should be included in the notes.

An explanation in HE+ System Notes or customer request reason field are required to describe which circumstances justify granting the exception to the household. Be specific about the household situation on the exception to exceed the \$1,200 cost limits that has been chosen.

Crisis applications over the cost limits will have an application status of 'Paid On Hold' or 'Reserved On Hold' (for Copayment codes). These applications will be reviewed by DEHCR, and will be approved or rejected after reviewing the notes left by the agency. Application status on immediate pay crisis codes will change to 'Paid/Denied Submitted' status after DEHCR approves or denies the override; no further action is required by the agency.

Application status on copayment or match payment crisis codes will change to 'Reserved Submitted' status if approved, or 'Denied Submitted' if denied. The agency must release the payment from the crisis application after the override is completed in order for the crisis application to extract.

The agency should not make a promise to pay to the vendor or applicant until the cost limits have been approved by DEHCR. If this is an emergency situation, contact the HE+ Help Desk for assistance.

The benefit formula for the State of Wisconsin provides a 4:1 ratio for households with high energy burdens. Households with the highest energy burden and the lowest income receive the highest benefit. The State of Wisconsin rounds down the median income guidelines for determining income eligibility. The benefit matrix is attached to this plan for further information.

### **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 households, e.g., benefit amounts, application period, etc.

There is no differentiation in the formula for calculating benefits however, funds are allocated specifically to allow for outreach to vulnerable households including those with elderly, disabled or young children as residents. These households are encouraged and assisted to apply for LIHEAP benefits.

In addition, there is an early application period targeted to households with fixed income (Social Security Benefits, Pensions, dividends/interest income and/or Veteran's Benefits) which allows them to apply in the summer months for the following Federal Fiscal Year.

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

Income



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

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

**2.6** Describe benefit levels:

\$ 30.00 Minimum benefit      \$ 2132 Maximum benefit

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

Yes     No -- If yes, describe.

Wisconsin Home Energy Assistance Program (WHEAP) agencies (sub-grantees) can provide additional services such as blankets, space heaters, weatherization stripping, light bulbs, etc. LIHEAP funds are used to provide the additional 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 3: COOLING ASSISTANCE**

**Eligibility, 2605(c)(1)(A), 2605(b)(2) – Assurance 2**

*\*The State of Wisconsin does not administer a Cooling Assistance Program*

**3.1 Designate the income eligibility threshold used for the cooling component:**

2019 HHS poverty income level \_\_\_\_\_%

**OR**

FY 2020 median income \_\_\_\_\_%

**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.**

- |  | <u>Yes</u>               | <u>No</u>                |
|--|--------------------------|--------------------------|
| ● Do you require an assets test?                             | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Do you have additional/differing eligibility policies for: |                          |                          |
| ● Renters?   | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Renters living in subsidized housing?                      | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Renters with utilities included in the rent?               | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Do you give priority in eligibility to:                    |                          |                          |
| ● Elderly?   | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Disabled?  | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Young children?  | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Households with high energy burdens?                       | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Other?   | <input type="checkbox"/> | <input type="checkbox"/> |

**3.4 Describe how you prioritize the provision of cooling assistance to vulnerable households, e.g., benefit amounts, application period, etc.**

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

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

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

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

**3.6** Describe benefit levels:

\$\_\_\_\_\_ Minimum benefit \$\_\_\_\_\_ Maximum benefit

**3.7** Do you provide in-kind (e.g. fans, air conditioners) and/or other forms of benefits?

Yes     No -- If yes, describe.

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

**Section 4: CRISIS ASSISTANCE,**

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

**4.1** Designate the income eligibility threshold used for the crisis component:

2019 HHS poverty income level \_\_\_\_\_%

**OR**

FY 2020 state median income \_\_\_\_\_ 60 %

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

Households must have existing/imminent lack of adequate heat/cooling in dwelling (emergency), or a risk of a heating emergency (proactive). While there is not a formal asset test, consideration may be given to resources available to the household before assistance is provided. No household will be eligible for crisis cooling assistance without a declaration by a local or state public health agency of a heat emergency and authorization is given by the Department of Administration.

A household may receive more than one crisis assistance payment.

Determination of eligibility for regular heating assistance benefits will determine a household eligible for crisis assistance for the remainder of the program period if the household has contributed \$25 or more towards their heating costs in the three months prior to application for crisis assistance.

**4.3** What constitutes a life-threatening crisis?

To qualify for a potentially life-threatening crisis, the weather and other conditions must create a concern for the health and life of the household's residents. Determination of a threat to health or safety of an eligible household is based on four factors: expected low temperature, condition of the dwelling unit (habitable, operable furnace, etc.), presence of vulnerable persons (persons with medical need for heat -- elderly, handicapped, children under six, etc.), and alternatives available to the household (place for temporary relocation, etc.). Medical need for heat and/or cooling may be considered in determining the presence of an emergency for vulnerable persons, including households with young children, handicapped and/or elderly persons. The presence of vulnerable persons may affect the amount and type of benefit provided to the household.

**Crisis Requirements, 2604(c)**

**4.4** Within how many hours do you provide crisis assistance that will resolve the energy crisis for eligible households? \_\_\_\_\_ 48 \_\_\_\_\_ Hours

**4.5** Within how many hours do you provide crisis assistance 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.

	<u>Yes</u>	<u>No</u>
● Do you require an assets test?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Do you give priority in eligibility to:		
● Elderly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
● Disabled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
● Young children?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
● Households with high energy burdens?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
● Other?	<input type="checkbox"/>	<input type="checkbox"/>
● In order to receive crisis assistance:		
● Must the household have received a shut-off notice or have a near empty tank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must the household have been shut off or have an empty tank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must the household have exhausted their regular heating benefit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must renters with heating costs included in their rent have received an eviction notice?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must heating/cooling be medically necessary?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must the household have non-working heating or cooling equipment?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Other?	<input type="checkbox"/>	<input type="checkbox"/>
● Do you have additional/differing eligibility policies for:		
● Renters?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Renters living in subsidized housing?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Renters with utilities included in the rent?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Explanations of policies for each "yes" checked above:

1. Priority in eligibility to elderly, disabled, young children, and households with high energy burdens, please see sections: 8.2.3, 4.2.4

**8.2.3 Outreach**

- 1) Agencies are required to provide outreach services to maximize participation of eligible persons for WHEAP benefits. Outreach activities must target households with disabled persons, elderly persons, children under six years old, and persons working at low-wage jobs (working poor). The "outreach indicator" is a question on the paper and system application. See Section 3.4.4 for more information about the outreach indicator.

- 2) Agencies are required to prominently display the Home Energy Plus Weatherization/WHEAP Co-Branding Poster in the agency's main waiting area for WHEAP intake. WHEAP agencies shall also consider displaying the poster in intake workers' offices, outreach locations, and other appropriate areas.
- 3) Agencies are required to ensure that persons with limited English proficiency (LEP) have meaningful and equal access to benefits and services. The agency is required to provide spoken interpretation in addition to translated written publications as some individuals may not read English or other language. The agency must have a mechanism to communicate orally with people with LEP. Providing the Spanish version of the Home Energy Plus (HE+) Application is not fulfilling this policy requirement. If the applicant requires spoken communication and/or explanation in addition to the translated application, agencies shall ensure verbal interpretation is available.
- 4) Agencies are required to provide services to the disabled and impaired, including but not limited to assisting applicants with the completion of the application form, translation of material, interpretation services for deaf, and reading services for blind.
- 5) Agencies must establish HE+ application sites that are accessible to targeted households.
- 6) Agencies must comply with Federal Law and provide an alternate intake site separate from a site which administers W-2/TANF.
- 7) Agencies must provide assistance with the preparation and submittal of applications by persons who are homebound.
- 8) Agencies must arrange an early application period for persons in targeted groups and high-risk households.
- 9) Agencies are required to complete a Program Operations and Community Service Plan (POCS) Plan. The Division provided template is available on the HE+ public website under WHEAP Grantee Information. The goal of this plan is to provide agencies with a means to describe how the agency will conduct outreach, how they will identify and enroll eligible households in their communities, and explain how the agency will reach targeted households. The POCS Plan should indicate what other community resources/stakeholders play a role in this outreach effort and identify key stakeholders that the agency coordinates efforts/referrals with. In addition, the list should indicate the local agency's contact person and the resource services provided. The plan must be made available to the Division upon request.
- 10) Agencies may choose to subcontract with non-profit organizations that administer W-2/TANF as long as an alternate intake method is offered which does not require applicants to apply in person.
- 11) Agencies may establish interagency agreements with other low-income program offices to perform some of the outreach activities to targeted groups.

#### 4.2.4 Exceptions to the Crisis Benefit Limit

The Division may grant an exception to the \$1,200 Crisis Assistance benefit limit for an applicant during a program year upon request by the local agency. Exceptions require an explanation from the agency as to why they wish to exceed this limit.

The following guidance applies to any crisis override request:

2. The agency should identify several of the following conditions to justify the request for an exception:
  - Household has met the minimum contribution requirement, or
  - Household faces an emergency (loss of heat) during the heating season, or
  - Household faces a loss of electrical service, which will create an emergency (loss of heat) during the heating season, or
  - During the past twelve (12) months the household has made payments toward the heating bills that represent more than 10% of household's annual gross income, or
  - Household contains a vulnerable individual (child under 6, verified disabled individual or individual 60 or older), or
  - The expected high temperatures for the next 72 hours will be below freezing (32° F), or
  - Other housing options do not exist for the household (no family, friends, or other resources re available), or
  - The household has no other resources (savings or other assets) to draw upon, or
  - Assisting with arrearage will help establish a payment plan the applicant will be able to meet, or help establish an account in their name. The proposed payment plan should be included in the notes.

An explanation in HE+ System Notes or customer request reason field are required to describe which circumstances justify granting the exception to the household. Be specific about the household situation on the exception to exceed the \$1,200 cost limits that has been chosen.

Crisis applications over the cost limits will have an application status of 'Paid On Hold' or 'Reserved On Hold' (for Copayment codes). These applications will be reviewed by DEHCR, and will be approved or rejected after reviewing the notes left by the agency. Application status on immediate pay crisis codes will change to 'Paid/Denied Submitted' status after DEHCR approves or denies the override; no further action is required by the agency.

Application status on copayment or match payment crisis codes will change to 'Reserved Submitted' status if approved, or 'Denied Submitted' if denied. The agency must release the payment from the crisis application after the override is completed in order for the crisis application to extract.

The agency should not make a promise to pay to the vendor or applicant until the cost limits have been approved by DEHCR. If this is an emergency situation, contact the HE+ Help Desk for assistance.

2. Renters with Utilities Included in the Rent, please see section 3.4.18

3.4.18 Field #12 Own or Rent Residence (If Applicable, Landlord Information)

If the customer lives in a mobile home and owns the unit, indicate they are an owner even if they pay lot rent in a mobile home park.

Landlord and/or management company contact information is essential to Weatherization referrals. For all rental situations, agencies shall enter, in the system, the landlord or management company contact information. The landlord's or management company name, address and phone number is required.

Workers shall not allow an application to deny if the customer does not provide landlord information within 30 days of the application date. Applications may need to be reinstated if denied incorrectly for not providing landlord information.

Customers are required to provide verification for the following payment methods and the means of verification must be indicated in HE+ System Notes:

- Rental payment includes energy in the monthly rent.
- Separate payment is made to the landlord, mobile home park owner...
- Do not pay...

Verification may include, but not is limited to:

- Observation of utility allowance on Form 50059 or Form 50058
- Observation of a lease or rental agreement,
- Verbal contact with the landlord, or
- In some cases, the heating vendor can verify if heat is included.

*NOTE: Observation of previous years' information is not an acceptable form of verification and new verification must be obtained.*

*NOTE: For multi-unit buildings, the agency may obtain information from the landlord/management company verifying that all units have heat and/or electric included in rent, a separate payment is made to landlord, or are 'do not pay'. This verification may be used for all units within the building and must be obtained on an annual basis. The means of verification must be indicated in HE+ system notes.*

## Determination of Benefits

4.8 How do you handle crisis situations?

- Separate component
- Fast Track
- Other

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

- Amount to resolve crisis, up to a maximum of \$ \_\_\_\_\_
- Other



Crisis emergency benefits will be determined based on the minimum required to meet the immediate threat to health and safety. Benefits will generally not exceed \$1,200, but may be increased for special targeted populations on a case by case basis. Other resources available to the household are considered in determining benefit levels. Crisis heating emergency services may include emergency fuel delivery, furnace repair/replacement, education on energy conservation measures, and budget counseling. Crisis cooling emergency services may include room air conditioner repair/purchase, fans, education on energy conservation measures, or budget counseling. No household will be eligible for crisis cooling assistance without a declaration by a local or state public health agency of a heat emergency and authorization is given by the Department of Administration. Determination of a threat to health or safety of an eligible household is based on four factors: expected low temperature, condition of the dwelling unit (habitable, operable furnace, etc.), presence of vulnerable persons (persons with medical need for heat -- elderly, disabled, children under six, etc.), and alternatives available to the household (place for temporary relocation, etc.). Medical need for heat and/or cooling may be considered in determining the presence of an emergency for vulnerable persons, including households with young children, disabled and/or elderly persons. The presence of vulnerable persons may affect the amount and type of benefit provided to the household. Proactive services and payments will be provided to prevent the occurrence of emergencies. Examples of proactive crisis heating and cooling assistance services provided to clients are budget counseling, copayment plans, due to an energy crisis situation a first month's rent or security deposit and energy conservation counseling. Counties and tribes and their subcontractors will be required to provide some form of assistance to resolve home heating energy emergency situations within 48 hours of application and within 18 hours in a life threatening situation in eligible households. This is not to be construed as requiring the issuance of a benefit payment within the above specified time period.

The Department of Administration (Wisconsin Home Energy Assistance Program) has annually been in contract with the Keep Wisconsin Warm Fuel Fund and/or Heat for Heroes. Once the fuel fund has raised match funds, LIHEAP matched funds are awarded. These funds are another resource made available to local sub-grantees for eligible low-income customers.

A homeless applicant who has proof of a permanent address to move into may be eligible for an energy assistance benefit if the following conditions are met:

- verification of a move to a permanent address
- the applicant must have established energy accounts
- if the homeless applicant cannot secure a home energy account due to large arrearages on a previous account, or does not have the money for a deposit, proactive crisis assistance may be used to assist them with securing energy services which in rare cases may include a first month's rent.

### **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

The State of Wisconsin allows for crisis applications to be taken via the phone, in office, or at alternate outreach locations. Outreach locations are both categorically and geographically diverse. For more information please see section 8.2.3 of the WHEAP Operations Manual.

### 8.2.3 Outreach

- 1) Agencies are required to provide outreach services to maximize participation of eligible persons for WHEAP benefits. Outreach activities must target households with disabled persons, elderly persons, children under six years old, and persons working at low-wage jobs (working poor). The “outreach indicator” is a question on the paper and system application. See Section 3.4.4 for more information about the outreach indicator.
- 2) Agencies are required to prominently display the Home Energy Plus Weatherization/WHEAP Co-Branding Poster in the agency’s main waiting area for WHEAP intake. WHEAP agencies shall also consider displaying the poster in intake workers’ offices, outreach locations, and other appropriate areas.
- 3) Agencies are required to ensure that persons with limited English proficiency (LEP) have meaningful and equal access to benefits and services. The agency is required to provide spoken interpretation in addition to translated written publications as some individuals may not read English or other language. The agency must have a mechanism to communicate orally with people with LEP. Providing the Spanish version of the Home Energy Plus (HE+) Application is not fulfilling this policy requirement. If the applicant requires spoken communication and/or explanation in addition to the translated application, agencies shall ensure verbal interpretation is available.
- 4) Agencies are required to provide services to the disabled and impaired, including but not limited to assisting applicants with the completion of the application form, translation of material, interpretation services for deaf, and reading services for blind.
- 5) Agencies must establish HE+ application sites that are accessible to targeted households.
- 6) Agencies must comply with Federal Law and provide an alternate intake site separate from a site which administers W-2/TANF.
- 7) Agencies must provide assistance with the preparation and submittal of applications by persons who are homebound.
- 8) Agencies must arrange an early application period for persons in targeted groups and high-risk households.
- 9) Agencies are required to complete a Program Operations and Community Service Plan (POCS) Plan. The Division provided template is available on the HE+ public website under WHEAP Grantee Information. The goal of this plan is to provide agencies with a means to describe how the agency will conduct outreach, how they will identify and enroll eligible households in their communities, and explain how the agency will reach targeted households. The POCS Plan should indicate what other community resources/stakeholders play a role in this outreach effort and identify key stakeholders that the agency coordinates efforts/referrals with. In addition, the list should indicate the local agency's contact person and the resource services provided. The plan must be made available to the Division upon request.
- 10) Agencies may choose to subcontract with non-profit organizations that administer W-2/TANF as long as an alternate intake method is offered which does not require applicants to apply in person.
- 11) Agencies may establish interagency agreements with other low-income program

offices to perform some of the outreach activities to targeted groups.

**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 yes, explain.

Applications can be taken over the phone or in person through a home visit.

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

Yes       No If yes, explain.

Applications are accepted at all outreach locations. Senior centers, libraries, and community centers are common outreach locations.

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

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

Winter Crisis                      \$     0     maximum benefit

Summer Crisis                      \$     n/a     maximum benefit

Year-round Crisis                      \$     \$1,200 total per season     maximum benefit

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

Yes       No If yes, describe.

WHEAP agencies in-kind provisions include blankets, space heaters, and temporary lodging.

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

Yes       No

The State of Wisconsin runs a year-round furnace program using 15% of the LIHEAP funds transferred to Weatherization. The State of Wisconsin also uses state Public Benefit funds that can assist in repairing or replacing heating units.

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

	Winter Crisis	Summer Crisis	Year-round Crisis
Heating system repair			x
Heating system replacement			x
Cooling system repair			
Cooling system replacement			

Wood stove purchase			
Pellet stove purchase			
Solar panel(s)			
Windmill(s)			
Utility poles / Gas line hook-ups			x
Other (Specify): temporary lodging			x

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

Yes       No \_\_\_\_\_

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

The State of Wisconsin institutes a moratorium on disconnections for regulated utilities from November 1<sup>st</sup> to April 15<sup>th</sup>.

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:

2019 HHS poverty income level \_\_\_\_\_%

**OR**

FY 2020 state median income 60 %

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

**5.3** 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.

Weatherization of shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities) is permitted.

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)  
50% eligibility qualifications for multi-unit buildings.

**Eligibility, 2605(b)(5) – Assurance 5**

Yes

No

5.6 Do you require an assets test?

5.7 Do you have additional/differing eligibility policies for:

- Renters?
- Renters living in subsidized housing?

5.8 Do you give priority in eligibility to:

- Elderly?
- Disabled?
- Young children?
- Households with high energy burdens?
- Other? Tribal Referrals

If you selected "Yes" for any of the options in 5.6, 5.7, or 5.8, you must provide further explanation of these policies in the text field below:

Tribal Referrals are given priority by Weatherization grantees

Renters who receive rental assistance (Section 8 or other government assisted housing) and their heat and/or electric is included in their rent and renters who pay neither rent or heating/electric cost because of an in-kind rental agreement are not eligible for energy assistance or weatherization.

The State of Wisconsin requires outreach activities to target households with elderly, disabled or children under six years old and person working at low-wage jobs. Weatherization also targets high energy users and our statewide computer system automatically refers tribal residents to our weatherization agencies.

### Benefit Levels

5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household?

Yes  No

5.10 What is the maximum amount? \$ \_\_\_\_\_

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

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

- Weatherization needs assessments/audits
- Caulking and insulation
- Install storm windows
- Heating system repairs
- Heating system replacement

- Cooling system repairs
- Cooling system replacement
- Energy related roof repair
- Major appliance repairs
- Major appliance replacement
- Install windows/sliding glass doors
- Install doors (interior/exterior)
- Install water heater
- Water conservation measures
- Compact florescent light bulbs
- Other (describe) Light-emitting diode (LED's)

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.

Wisconsin's low income housing stock often needs minor structural or electrical improvements before weatherization work can proceed. Wisconsin proposes to use a portion of the allowable 15% transfer to the Weatherization Assistance Program to address minor deferrals so that these units will be in appropriate condition for a weatherization energy audit to be performed and the installation of energy conservation measures. Households may have been deferred previously for weatherization services or are targeted to receive weatherization services within the current WAP year. All households must be determined to be WHEAP eligible at 60% of state median income for program year 2019-2020 prior to the time of work being completed. The predominant reasons for deferral as identified in our tracking of homes deferred for weatherization that would be addressed are minor Water/Moisture Issues in Basements, Structural Roof or Ceiling and Repair (not a full roof replacement) and or Electrical Deficiencies.

## Section 6: Outreach, 2605(b)(3) – Assurance 3, 2605(c)(3)(A)

6.1 Select all outreach activities that you conduct that are designed to assure that eligible households are made aware of all LIHEAP assistance available:

- Place posters/flyers in local and county social service offices, offices of aging, Social Security offices, VA, etc.
- Publish articles in local newspapers or broadcast media announcements.
- Include inserts in energy vendor billings to inform individuals of the availability of all types of LIHEAP assistance.
- Mass mailing(s) to prior-year LIHEAP recipients.
- Inform low income applicants of the availability of all types of LIHEAP assistance at application intake for other low-income programs.
- Execute interagency agreements with other low-income program offices to perform outreach to target groups.
- Other (specify):

Allocate funds specifically for the purpose of outreach to households with elderly, disabled, rural poor, and/or young children residents.

An early application period is utilized prior to the heating season. This process includes accepting applications during the summer for the following Federal Fiscal Year from targeted households.

Accept applications for energy assistance at sites geographically accessible to all households in the area to be served. This includes setting up LIHEAP application sites for targeted households (contacting targeted persons or their representatives to ascertain convenient times and places, contacting community leaders to locate and serve application sites, providing information on alternate sites to organizations/programs likely to reach targeted persons, contacting targeted persons to arrange application appointments, transportation, etc.).

Provide information directly or by selective mailing to targeted applicants, e.g., assistance to understand the application form, translation of material, interpretation services for deaf, reading for blind needed to complete their application.

Facilitate access to state weatherization programs targeted to LIHEAP eligible households and other energy-related services e.g., utility early identification and emergency intervention.

Counties and tribal agencies are required to provide outreach services to maximize participation of eligible persons in the Low Income Home Energy Assistance Program. It is the responsibility of each county/tribe to provide application sites accessible to the eligible population in the county/tribe, with particular attention to overcoming barriers for targeted households. Outreach client benefits include: taking applications, certifying application information, and processing applications at an alternate site.



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.)

- Joint application for multiple programs
- Intake referrals to/from other programs
- One-stop intake centers
- Other – describe:

Wisconsin administers LIHEAP, DOE, Public Benefit weatherization programs and housing programs through the same state office, the Department of Administration, Division of Energy, Housing and Community Resources (DEHCR). LIHEAP is coordinated at the state level with income maintenance programs through agreements and data collection/sharing with the Department of Children and Families (DCF) and Department of Health Services (DHS). DCF operates the Temporary Assistance to Needy Families (TANF), W-2, including the jobs and welfare to work program as well as other assistance programs. DHS operates Medicaid, FoodShare (SNAP), and Aging and Disability Resource Centers

Beginning in FY2001, State of Wisconsin Public Benefits funds were used to make non-heating payments to eligible recipients. Public Benefit funds are fully integrated into the Wisconsin Home Energy Assistance Program, WHEAP.

Coordination between the state and local level is achieved by including representation from a variety of private and government agencies interested in energy services and/or services for low-income persons on the Low Income Energy Advisory Committee (LIEAC). Wisconsin also utilizes a workgroup from the Wisconsin Home Energy Assistance Program (WHEAP) agencies to provide input on new policy and system related changes.

WHEAP agencies coordinate their programs with each other, with utility-operated programs and with other government and nonprofit programs operated within their service area. WHEAP Agencies are required to develop a local coordination plan annually to show what is being done to coordinate with weatherization agencies, fuel providers (utility and bulk fuels), and other local groups.

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**

**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**

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

Sub-grantees are required to provide alternate outreach and intake sites other than the local county/tribe office.

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

N/A

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

Sub-grantees are required to provide alternate outreach and intake sites other than the local county/tribe office.

<b>8.5</b> LIHEAP Component Administration	<u>Heating</u>	<u>Cooling</u>	<u>Crisis</u>	<u>Weatherization</u>
<b>8.5a</b> Who determines client eligibility?	Local County Government	N/A	Local County Government	Local County Government
<b>8.5b</b> Who processes benefit payments to gas and electric vendors?	State Administration Agency	N/A	State Administration Agency	
<b>8.5c</b> Who processes benefit payments to bulk fuel vendors?	State Administration Agency	N/A	State Administration Agency	
<b>8.5d</b> Who performs installation of weatherization measures?				Non-Profits

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 application, 8.9.

**8.6** What is your process for selecting local administering agencies?

State of Wisconsin Statute requires the contracts for administering the program be with Wisconsin counties. State of Wisconsin contracts with six tribes: Bad River Tribe, Lac Courte Oreilles Band, Lac Du Flambeau Tribe, Oneida Tribe, Red Cliff Tribe and Stockbridge-Munsee Tribe. Counties and tribes may elect to subcontract any or all program functions.

Wisconsin follows Department of Energy regulation 440.15 for selecting weatherization subgrantees.

**8.7** How many local administering agencies do you use?

78

**8.8** Have you changed any local administering agencies from 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?

Heating  Yes  No

Cooling  Yes  No

Crisis  Yes  No

Are there exceptions?  Yes  No

If yes, Describe.

For all of the items requiring policy references, please access the Wisconsin Home Energy Assistance Program (WHEAP) Operations Manual at: <http://homeenergyplus.wi.gov/category.asp?linkcatid=256&linkid=122&locid=25> and access the following sections:

1. Heating, please see sections 1.3.1, 7.1, 7.2, and 7.8.1
2. Crisis, please see sections 1.1.2, 4.2.1, 7.2, and 8.3.5.5
3. Exceptions, please see sections 7.1, 7.3, and 7.4

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

At the time the LIHEAP payment is sent to the vendor, a payment notification is generated and sent to the client, indicating the amount of the payment and the vendor to whom the payment was made. When applications are completed interactively, customers are informed at the conclusion of the interview and are immediately provided with a benefit summary document that also provides the amount of benefits that will be paid to their energy provider. Additionally, each Wednesday, the Wisconsin system processes all completed applications. For those customers' whose payments are issued to a Class A Utility, the payments are issued on Friday (2 business days later). All other payments are issued the following Monday (3 business days later). In addition to the payments being processed 2-3 business days later, the Wisconsin system also mails customer notification letters.

Households receiving weatherization and/or energy related repairs receive a written work agreement of work to be performed.

### 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 Department of Administration requires vendors to register for participation in the heating assistance program and complete and sign a Vendor Agreement. To register, fuel suppliers agree that clients will be: treated equally with non-LIHEAP households, not be adversely affected, e.g., the eligible household will be charged in the supplier's normal billing process, the price charged will be the price normally charged non- LIHEAP eligible households, invoices will clearly indicate the amount and cost of home energy provided, and no discrimination will occur against eligible

households with respect to terms, deferred payment plans, credit, conditions of sales or discounts offered other home energy customers.

In addition, a Vendor Desktop Monitoring process is in place to conduct a review of LIHEAP payments and fuel provided, in comparison with non-LIHEAP customers.

Crisis assistance fuel payments are made to vendors registered for heating assistance. In addition to signing assurances guaranteeing that LIHEAP clients will be treated equally with non-LIHEAP households and will not be adversely affected, registered vendors are required to provide information on costs and procedures for emergency fuel delivery.

Energy related home repair and weatherization purchases made by LIHEAP weatherization providers follow appropriate state or federal procurement guidelines and applicable material standards.

**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 Department of Administration requires vendors to register for participation in the heating assistance program and to sign a completed Vendor Agreement. To register, fuel suppliers agree that clients will be: treated equally with non-LIHEAP households, not be adversely affected, e.g., the eligible household will be charged in the supplier's normal billing process, the price charged will be the price normally charged non- LIHEAP eligible households, invoices will clearly indicate the amount and cost of home energy provided, and no discrimination will occur against eligible households with respect to terms, deferred payment plans, credit, conditions of sales or discounts offered other home energy customers.

In addition, a Vendor Desktop Monitoring process is in place to conduct a review of LIHEAP payments and fuel provided, in comparison with non-LIHEAP customers.

Crisis assistance fuel payments are made to vendors registered for heating assistance. In addition to signing assurances guaranteeing that LIHEAP clients will be treated equally with non-LIHEAP households and will not be adversely affected, registered vendors are required to provide information on costs and procedures for emergency fuel delivery.

Energy related home repair and weatherization purchases made by LIHEAP weatherization providers follow appropriate state or federal procurement guidelines and applicable material standards.

**9.5** Do you make payments contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households?  Yes  No. If so, how?

Unregulated vendors are subject to the same program operation policies as regulated vendors. All vendors must register with the Wisconsin Home Energy Assistance Program (WHEAP) by submitting a complete and signed vendor agreement before any payments will be made to the vendor. The vendor access to the Home Energy Plus system is limited and does not allow vendors to enter information into the system. Vendor payments are Home Energy Plus system generated and based on approved applications. All WHEAP vendors must sign the standard vendor agreement after which they are placed on a registered vendor list.

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

**Section 10: Program, Fiscal Monitoring, and Audit, 2605(b)(10) – Assurance 10**

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

The Administrative Review (AR) team uses a multi-faceted approach to track sub-grantee awards. The AR team conducts regular analysis of sub-grantee spending which includes both contract and benefit funds. Contract fund analysis includes an ongoing assessment of the frequency and reasonableness of agency invoicing. The AR team monitors and enforces the policy governing the frequency of agency invoicing, which is required monthly for agencies with an annual contract allocation of \$25,000 or greater, and quarterly for those agencies receiving less than \$25,000. The AR team assesses spending across each of the five contract accounts to determine the appropriateness and reasonableness of agency spending. When on site, the AR team also evaluates staff activity logs and provides Training and Technical Assistance (T/TA) as needed to ensure that costs are assigned to the correct account lines. Agencies are also required to segregate the invoice creation and invoice approver duties to maintain program integrity. The AR team evaluates the three prior years of spending of contract and/or crisis benefit funds. This assessment occurs both on site and in the Desktop Monitoring (DTM) process.

The Division’s Home Energy Plus (HE+) System, processes agency invoices for payment. There are safeguards built into the system to ensure that no funds are expended beyond the allowable contractual period. The Division proactively communicates with agencies via policy, training and network wide communications advising them to submit their invoices within the allowable contractual period. They are further advised that any expenses submitted outside of this period will not be paid.

The Division also relies on the findings from the required State Single Audit. Agencies are required to have a two-tier approval process for invoicing and must submit their financial audits to the State annually. Agency internal control deficiencies are discussed to determine if there is a potential to affect the integrity of the program. As part of this process, agencies are also required to disclose any instances of worker fraud.

Refunds are tracked and recorded on the HE+ System.

**Audit Process**

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

Yes     

**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 federal fiscal year.

Finding	Type	Brief Summary	Resolved?	Action Taken

#### 10.4 Audits of Local Administering Agencies

- What types of annual audit requirements do you have in place for local administering agencies/district offices?
  - Local agencies/district offices are required to have an annual audit in compliance with the 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 by:

Grantee employees:

- Internal program review
- Departmental oversight
- Secondary review of invoices and payments
- Other program review mechanisms are in place. Describe

- The State of Wisconsin, Department of Administration, Division of Energy, Housing and Community Resources (DEHCR) conducts regular monitoring of its grantees via Administrative Reviews, and Desktop Monitoring.
- The DEHCR Administrative Review measures policy compliance in the following key program components: Fiscal and Program Operations, Program Integrity and Case File Review.

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:

- DEHCR Contracts with 72 local county and six tribal agencies to administer WHEAP. The six tribal agencies are: Bad River Tribe, Lac Courte Oreilles Band, Lac Du Flambeau Tribe, Oneida Nation Tribe, Red Cliff Tribe and Stockbridge-Munsee Tribe.
- Annually, counties/tribes not scheduled for an Administrative Review are reviewed via Desktop Monitoring activities.
- Ongoing Statewide Monitoring includes, but is not limited to, the following areas: caseload variances, accuracy of eligibility determination, customer complaints, program fraud, and contract spending.
- Local agencies are required to conduct internal quality assurance reviews. Quality Assurance reviews to ensure that workers are correctly interpreting and applying program requirements, policies and eligibility determination.



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

Prior to each program year, DEHCR conducts a risk assessment that is based primarily on prior program year monitoring activities. The risk assessment outputs are used to establish a provisional schedule for Administrative Reviews (onsite) and Desktop Monitoring activities.

**10.7** Describe how you select local agencies for monitoring reviews?

Site Visits:

All 78 agencies are monitored on an annual basis. An Administrative Review (onsite) is conducted for agencies with a higher risk (score).

Desk Review: All agencies not scheduled for an on-site review are scheduled for a Desktop Monitoring review.

**10.8** How often is each local agency monitored?

All 78 agencies are monitored on an annual basis.

**10.9** What is the combined error rate for eligibility determinations? (Optional)

All case files reviewed in the FFY 2019 Administrative Reviews and Desktop Monitorings identified a cumulative error rate of 0% where the error resulted in a household being wrongly determined as eligible or being wrongly determined as ineligible.

**10.10** What is the combined error rate for benefit determinations? (Optional)

All case files reviewed in the FFY 2019 Administrative Reviews and Desktop Monitoring Reviews identified a cumulative error rate of 1%.

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

None

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

None

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

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

**11.1** How did you obtain input from the public in the development of your LIHEAP plan?

Check 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?

N/A

**Public Hearings, 2605(a)(2)**

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

Date	Event Description
July 25, 2019	Public Hearing is scheduled at Department of Administration, 101 E Wilson Street, Madison, WI

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

Zero

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

N/A

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

N/A

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?

6

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

One

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

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

Households have 45 days from the date the application process was completed to file a fair hearing if they believe their application was incorrectly denied, the application received no action in the appropriate timeframe or incorrect facts or improper procedures were used to determine eligibility, assistance amounts, or services provided. The fair hearing procedures follows three steps:

Step 1: Local WHEAP Agency reviews the appeal request and works with the household to try to resolve the issue. If the household is not satisfied with the outcome of the WHEAP Agency's response, a written formal appeal may be submitted to the Division of Energy, Housing and Community Resources (DEHCR).

Step 2: DEHCR reviews the formal appeal to ensure compliance with the WHEAP policies, procedures, and applicable statutes. Once DEHCR completes their review, a written appeal decision is sent to the household. If the household is still not satisfied with the outcome of DEHCR's decision, a written formal appeal may be submitted to the Division of Hearings and Appeals (DHA).

Step 3: DHA receives an appeal request and sends an email with a copy of that request, along with a Summary of Action Leading to Appeal form "summary form" and a Request Withdrawal form to the local WHEAP agency contact. The local WHEAP agency completes the summary form and emails it back to DHA.

If the local WHEAP agency is able to resolve the issue with the household, the WHEAP agency indicates that the issue was resolved and explains the actions taken in the Explanation of Action section of the summary form and advises the household to withdraw the appeal.

If the matter has not been resolved between the local WHEAP agency and household, DHA uses the information provided in the summary form to schedule the hearing.

DHA sends a letter to the household notifying them of receipt of the appeal, a letter when the hearing date is sent, and a letter with outcome results.

**12.5** When and how are applicants informed of these rights?

Applicants are provided these rights upon application through signing a Certification Page (<http://homeenergyplus.wi.gov/category.asp?linkcatid=566&linkid=122&locid=25>). They are also provided the information on their Benefit Notice.

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

All appeal requests are handled in the same manner regardless of the reason.

**12.7** When and how are applicants informed of these rights?

Applicants are provided these rights upon application through signing a Certification Page. They are also provided the information on their Benefit Notice.

DHA sends a letter to the applicant notifying them of receipt of the appeal, a letter when the hearing date is sent, and a letter with outcome results.

**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?

The State of Wisconsin may, through contract with local LIHEAP providers and/or under contract with the Wisconsin Community Action Program and/or through arrangements with other service providers, engage in the following activities:

1. Budget counseling, energy conservation training, copayment agreements, advocacy with fuel suppliers, household energy assessments and referrals.
2. Support for services provided by leveraged funds. These services will include those provided under regular crisis assistance, but only when non-federal funds are used toward copayments, etc.
3. Intensive case management targeted to households selected from those as "high heating costs compared to household income" and "high heating costs for dwelling type".
4. Educational classes may be offered through third-party contract agencies, utilities, state staff, or other qualified individuals.

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

Wisconsin does not utilize funds under assurance 16. The State of Wisconsin conducts similar activities that are reported via the Outreach and Crisis Assistance components of the program.

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

N/A

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

N/A

**13.5** How many households applied for these services?

N/A

**13.6** How many households received these services?

N/A

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

**Section 14: Leveraging Incentive Program, 2607A**

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

Yes     No

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

If leveraging funds become available, Wisconsin would apply for them.

**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:

What is the type of resource or benefit?	What is the source(s) of the resource?	How will the resource be integrated and coordinated with the LIHEAP program?

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:

**New employees are provided with an orientation that includes policy and program related information**

#### 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:

**Training is provided via ongoing help desk and monitoring activities.**

Employees are provided with policy manual

Other – Describe:

**Online training modules are available for viewing throughout the course of the program year.**

#### c. Vendors

Formal training conference

How often?

Annually

Biannually

As needed

Other – Describe:

Policies communicated through vendor agreements

Policies are outlined in a vendor manual

Other – Describe:

**Training is provided via help desk activities and informational transmittals emailed to our vendors.**



**15.2** Does your training program address fraud reporting and prevention?

Yes       No

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

## Section 16: Performance Goals and Measures, 2605(b)

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

The State of Wisconsin has implemented the required LIHEAP Performance Measures into our web based application intake system, as well as the paper application process. Every applicant provides a response to the performance measures questions and that information is retained and made available for reporting purposes. All required data elements will be reported by the annual deadline.

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.

- 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:  
WHEAP approved vendors provide referrals for cases to review as well.

b. Describe strategies in place for advertising the above-referenced resources.

- 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.

REQUIRED Type of Identification Collected	Collected from Whom?		
	Applicant Only	All Adults in HH	HH Members Seeking Assistance*
Social Security Card is photocopied and retained	Required <input type="checkbox"/>	Required <input type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>
Social Security Number (without actual card)	Required <input checked="" type="checkbox"/>	Required <input checked="" type="checkbox"/>	Required <input checked="" type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>
Government-issued identification card (i.e.: driver's license, state ID, Tribal ID, passport, etc.)	Required <input checked="" type="checkbox"/> For first time applicants	Required <input type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>
Other:	Required <input type="checkbox"/>	Required <input type="checkbox"/>	Required <input type="checkbox"/>

b. Describe any exceptions to the above policies.

The following are Social Security Number exceptions:

- Infants under 60 days old
- Religiously exempt from Social Security

- Ineligible non-citizens
- Household members over 60 days old with Division approval

### 17.3 Identification Verification

Describe what methods are used to verify the authenticity of identification documents provided by clients or household members.

- Verify SSNs with Social Security Administration
- Match SSNs with death records from Social Security Administration or state agency
- Match SSNs with state eligibility/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 grantee's only)
- Match SSN/Tribal ID number with tribal database [
- Other – describe:

### 17.4 Citizenship/Legal Residency Verification

What are your procedures for ensuring that household members are U.S. citizens or aliens who are qualified to receive LIHEAP benefits?

- Clients sign an attestation of citizenship or legal residency
- Clients' submission of Social Security cards is accepted as proof of legal residency
- Noncitizens must provide documentation of immigration status
- Citizens must provide a copy of their birth certificate, naturalization papers, or passport
- Noncitizens are verified through the SAVE system
- Tribal members are verified through Tribal database/Tribal ID card
- Other – describe:

### 17.5 Income Verification

What methods does your agency utilize to verify household income?

- 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:

County agencies and tribes have access to verify through Department of Health Services eligibility/management system (CARES).

- 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:

County agencies and tribes have access to verify through other State Departments eligibility/management system, unemployment benefits, social security income, and utilize state directory of quarterly wage matches and new hires.

### 17.6 Protection of Privacy and Confidentiality

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

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:

Grantees are required to agree to an online confidentiality agreement within the State's Home Energy Plus system. Grantees that don't have access to the State's Home Energy Plus database are required to fill out written confidentiality agreements and retain them in a secure location. On site reviews include a component of physical confirmation of the protection of customer information.

### 17.7 Verifying the Authenticity of Energy Vendors

What policies are in place for verifying vendor authenticity?

All vendors must register with the State

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:

State of Wisconsin performs desktop monitoring of approved program vendors

### 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?

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:

If account is active

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 heating 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:  
The State of Wisconsin conducts program vendor monitoring in which a review of payments is conducted.

**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?

- 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
- 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.

- 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.

The Home Energy Plus System (Intake System) contains mechanisms for recording and collecting, and issuing communication of improper payments.

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