

# Weatherization & LIHEAP Eligibility and Coordination

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# Overview

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- Federal Coordination on Eligibility
- Client Eligibility
  - Income Thresholds
  - Income Determination
  - Income Exclusions
  - 2021 Poverty Income Guidelines
- WAP/LIHEAP Coordination
  - Office Overlap
  - Agency Rules
  - Percentage of LIHEAP Funds Transferred
  - LIHEAP Transfer Rules
- Braiding Funds and ACPU

# Federal Coordination on Eligibility

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- Since February 2020, DOE has collaborated with HHS and HUD on how to better support interagency coordination on client eligibility for the respective programs.
  - WAP
  - LIHEAP
  - HUD Home Repair programs (Lead Hazard Control, Healthy Housing, Housing Rehabilitation)

# Client Eligibility



Households using up to **200%** of Federal Poverty Guidelines (FPG).



Households using 150% of FPG or states may elect to use 60% of State Median Income (SMI), whichever is greater for their respective state.

Each Grantee is permitted under **42 USC 8624(b)(2)(B)** to set an income limit within this range.

# Weatherization Program Notice 21-3



Department of Energy  
Washington, DC 20585

## WEATHERIZATION PROGRAM NOTICE 21-3 EFFECTIVE DATE: February 10, 2021

**SUBJECT:** 2021 FEDERAL POVERTY GUIDELINES AND DEFINITION OF INCOME

**INTENDED AUDIENCE:** WAP Grantee Program Managers, WAP Subgrantee Managers

**PURPOSE:** To provide Grantees with the 2021 Federal Poverty Guidelines and Definition of Income for use in the Low-Income Weatherization Assistance Program (WAP).

**SUPERSEDES:** Weatherization Program Notice (WPN) 21-3 supersedes WPN 20-3.

**SCOPE:** The provisions of this WPN apply to all WAP Grantees applying for financial assistance under the Department of Energy's (DOE) WAP. This Notice supersedes WPN 20-3.

**LEGAL AUTHORITY:** Title IV, Energy Conservation and Production Act, as amended, authorizes DOE to administer the WAP. All grant awards made under this Program shall comply with all applicable laws and regulations including, but not limited to, the WAP Regulations contained in Code of Federal Regulations (CFR) [10 CFR Part 440](#), as applicable.

**PROCEDURES:** The annual revision of the U.S. Department of Health and Human Services (HHS) poverty income guidelines is published in the Federal Register. The guidelines are accessible at the [HHS website](#), as well.

Attached is a table displaying the revised guidelines showing income eligibility limits at 200 percent of the poverty guidelines per the requirements contained in Section 412(7) of the Energy Conservation and Production Act (42 U.S.C. 6862(7)). Adjusted tables for Alaska and Hawaii are also included. These guidelines are effective as of January 13, 2021, and apply to both farm and non-farm families. American Samoa, Guam, Northern Arapaho, Northern Marianas, Puerto Rico and US Virgin Islands must select the appropriate set of poverty guidelines and include them in their State Plans for review and approval by DOE prior to use.

Grantees shall distribute these tables immediately to their Subgrantees for use in the Program from the effective date of this Guidance until updated in subsequent policy documents. Additionally, this WPN provides Grantees with a definition of income for use in the WAP. This Guidance continues to reaffirm previous guidance by outlining what is expected to be available in terms of source documentation for review when requested by an outside authority.

- Released annually with Application Package.
- Provides specifics on income eligibility limits and other pertinent details.

# Client Eligibility – Income Thresholds

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**Income eligibility must be in accordance with DOE regulations. The family must be:**

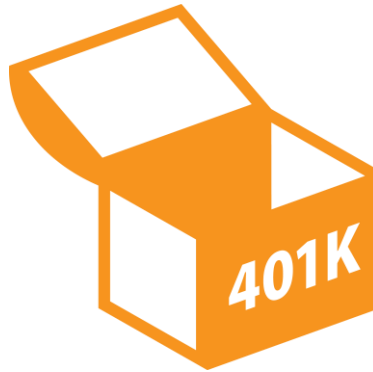
- At or below 200% of the poverty level, relevant to size of the family.
- Eligible for supplemental cash assistance payments under Title IV or Title XVI of the Social Security Act, or
- If the Grantee elects, eligible for LIHEAP, provided LIHEAP eligibility is at or below 200% of poverty.

# Client Eligibility – Income Determination

**Income** means **Cash Receipts** earned and/or received by the applicant before taxes during the applicable tax year(s).



Money, wages and salaries



Pensions, including military retirement pay, insurance or annuity payments



Social Security payments



Dividends and/or interest



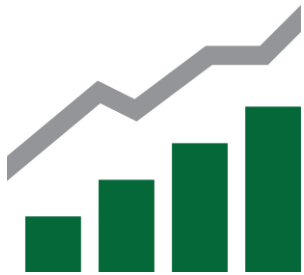
Net rental income and net royalties



Net gambling or lottery winnings

# Client Eligibility – Income Exclusions

The following **Cash Receipts** are not considered sources of income when determining applicant eligibility:



Capital Gains



Assets drawn down



Proceeds from sale  
of real estate or cars



Gifts, loans, or lump  
sum inheritances



College scholarships



Insurance payments or  
injury compensation



Federal non-cash benefits  
(Medicare, Medicaid, Food  
Stamps, etc.)



Child Support



# 2021 Poverty Income Guidelines

## Contiguous States U.S. Grantees

Size of Family Unit	Threshold	200%
1	\$12,880	\$25,760
2	\$17,420	\$34,840
3	\$21,960	\$43,920
4	\$26,500	\$53,000
5	\$31,040	\$62,080
6	\$35,580	\$71,160
7	\$40,120	\$80,240
8	\$44,660	\$89,320

For families with more than 8 persons, add \$4,540 for each additional person. Therefore, for weatherization at 200% of poverty level, add \$9,080 for each additional person.

*\* Additional charts available specific to Hawaii and Alaska*

# **LIHEAP & WAP Coordination**



# LIHEAP Plan Example

## Report Sections

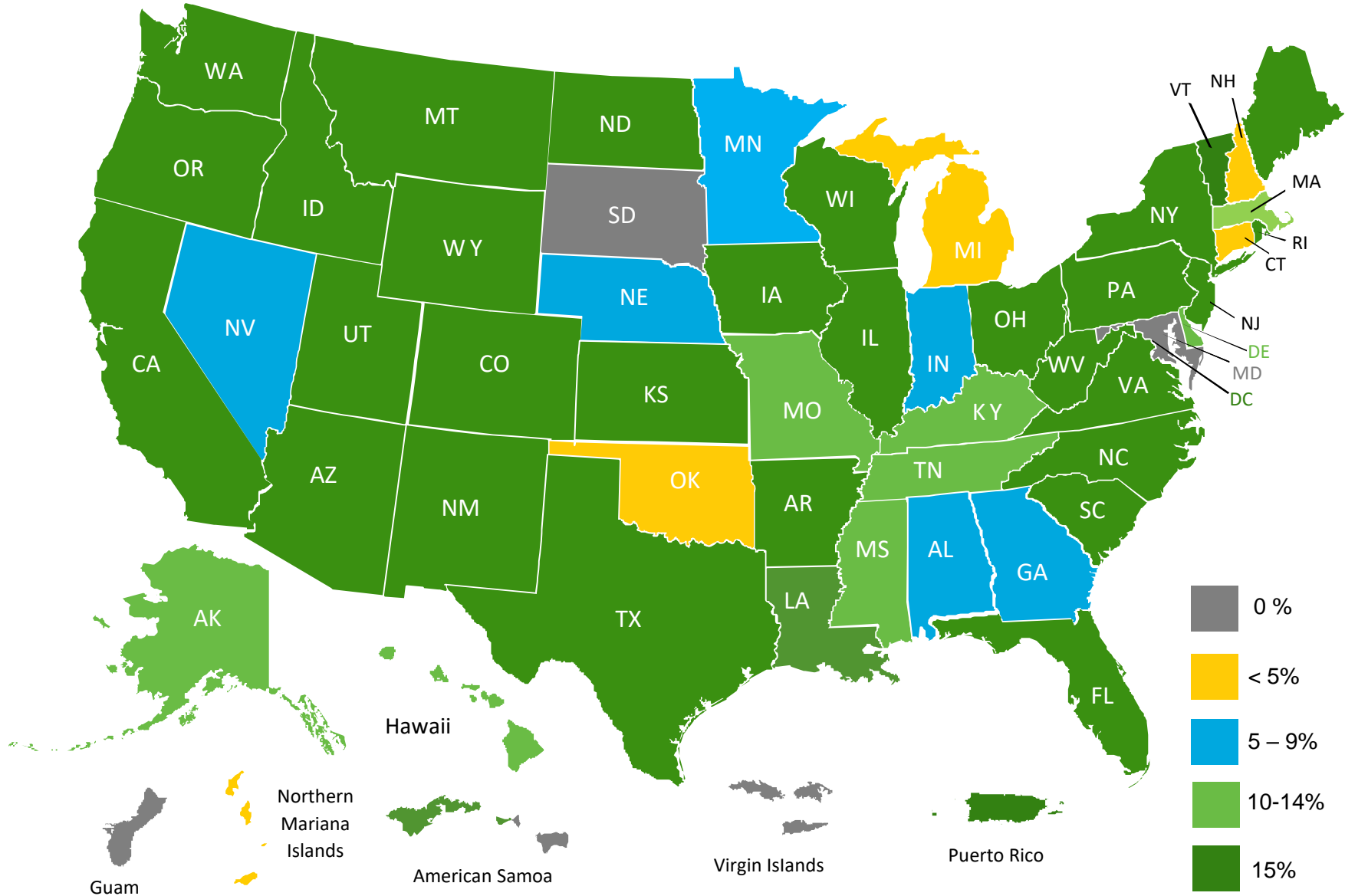
- 1. Mandatory Grant Application SF-424*
- 2. Section 1 - Program Components*
- 3. Section 2 - HEATING ASSISTANCE*
- 4. Section 3 - COOLING ASSISTANCE*
- 5. Section 4 - CRISIS ASSISTANCE*
- 6. Section 5 - WEATHERIZATION ASSISTANCE*
- 7. Section 6 - Outreach, 2605(b)(3) - Assurance 3, 2605(c)(3)(A)*
- 8. Section 7 - Coordination, 2605(b)(4) - Assurance 4*
- 9. Section 8 - Agency Designation,, 2605(b)(6) - Assurance 6*
- 10. Section 9 - Energy Suppliers,, 2605(b)(7) - Assurance 7*
- 11. Section 10 - Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10*
- 12. Section 11 - Timely and Meaningful Public Participation, , 2605(b)(12) - Assurance 12, 2605(c)(2)*
- 13. Section 12 - Fair Hearings,2605(b)(13) - Assurance 13*
- 14. Section 13 - Reduction of home energy needs,2605(b)(16) - Assurance 16*
- 15. Section 14 - Leveraging Incentive Program ,2607A*
- 16. Section 15 - Training*
- 17. Section 16 - Performance Goals and Measures, 2605(b)*
- 18. Section 17 - Program Integrity, 2605(b)(10)*
- 19. Section 18: Certification Regarding Debarment, Suspension, and Other Responsibility Matters*
- 20. Section 19: Certification Regarding Drug-Free Workplace Requirements*
- 21. Section 20: Certification Regarding Lobbying*
- 22. Assurances*
- 23. Plan Attachments*

# LIHEAP Plan – Section 1

Section 1 Program Components		
Program Components, 2605(a), 2605(b)(1) - Assurance 1, 2605(c)(1)(C)		
1.1 Check which components you will operate under the LIHEAP program. (Note: You must provide information for each component designated here as requested elsewhere in this plan.)		Dates of Operation
		Start Date      End Date
<input checked="" type="checkbox"/>	Heating assistance	10/01/2020      04/30/2021
<input type="checkbox"/>	Cooling assistance	
<input checked="" type="checkbox"/>	Crisis assistance	10/01/2020      09/30/2021
<input checked="" type="checkbox"/>	Weatherization assistance	10/01/2020      09/30/2021
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%.		Percentage ( % )
Heating assistance		57.00%
Cooling assistance		0.00%
Crisis assistance		8.00%
Weatherization assistance		15.00%
Carryover to the following federal fiscal year		7.00%
Administrative and planning costs		10.00%
Services to reduce home energy needs including needs assessment (Assurance 16)		3.00%



## Percentage of LIHEAP Funds Transferred



# LIHEAP Plan – Section 5

## Section 5 - WEATHERIZATION ASSISTANCE

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

August 1987, revised 05/92,02/95,03/96,12/98,11/01

OMB Clearance No.: 0970-0075

Expiration Date: 09/30/2020

### LOW INCOME HOME ENERGY ASSISTANCE PROGRAM(LIHEAP) MODEL PLAN SF - 424 - MANDATORY

## Section 5: WEATHERIZATION ASSISTANCE

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

5.1 Designate the income eligibility threshold used for the Weatherization component

Add	Household Size	Eligibility Guideline	Eligibility Threshold
1	All Household Sizes	HHS Poverty Guidelines	200.00%

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

5.3 If yes, name the agency.

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

# Eligibility Summary


# of Grantees	LIHEAP Eligibility	DOE Eligibility
5	150% FPL	200% FPL
9	60% SMI	200% FPL
6	60% State Median Income (SMI)	
30	200% Federal Poverty Level (FPL)	



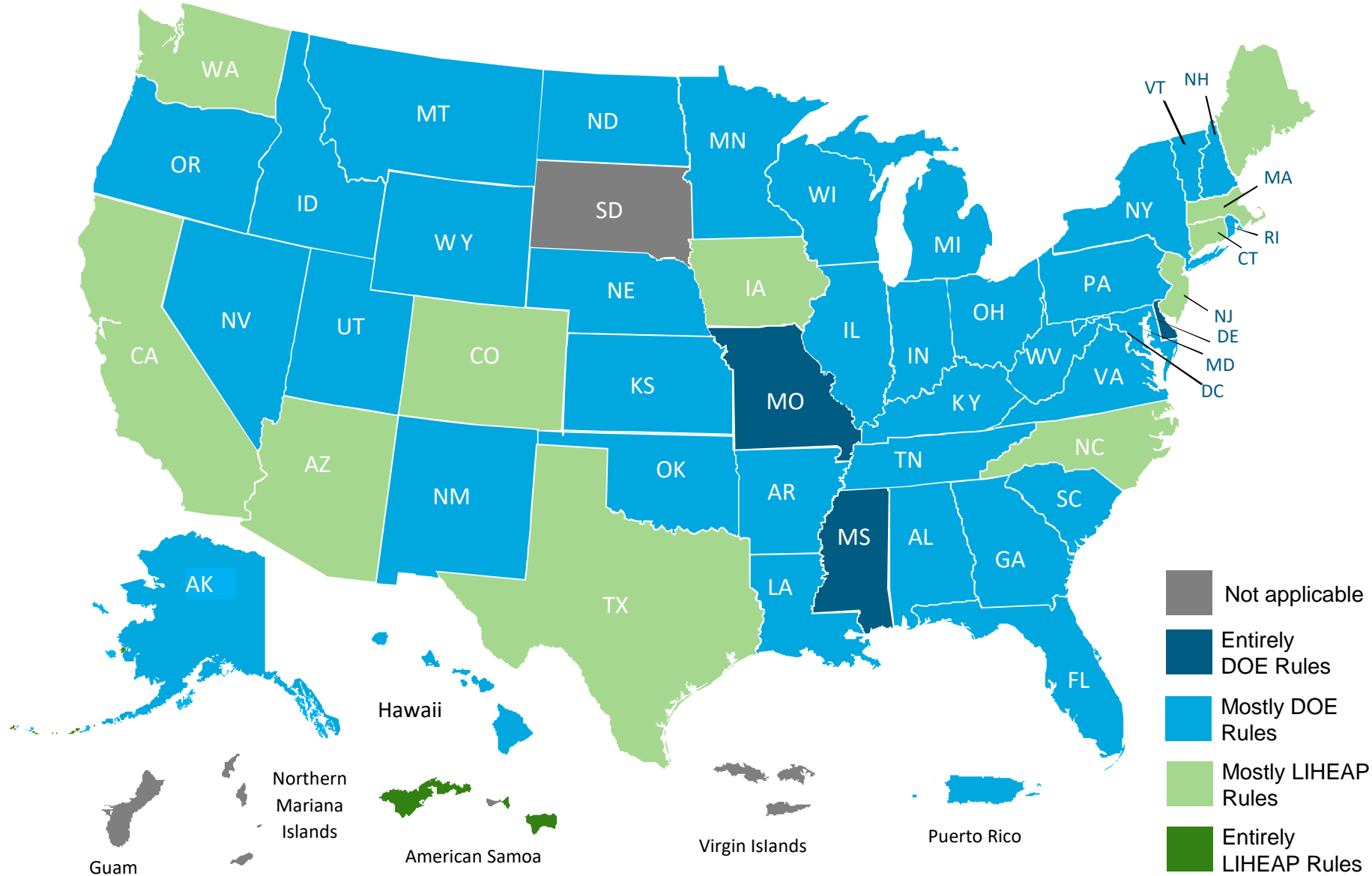
# LIHEAP Plan – Section 5

## 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:

# Agency Rules | FY 2021



# LIHEAP Transfer Rules – Mostly LIHEAP

- When a Grantee indicates a rule exception in their LIHEAP plan, it generally means they are following the DOE rules for that issue.
  - Income threshold = 200% FPL
  - Multifamily eligibility = at least 66% of units must income-qualify)
  - Weatherization of temporary shelters
- Four Grantees specified an allowable average cost per unit (ACPU) that is greater than the current DOE ACPU.

# LIHEAP Transfer Rules – Mostly DOE

According to 2021 LIHEAP Plans, common exceptions:

- Average cost per unit (19 Grantees)
- Savings to investment ratio (18 Grantees)
- Reweatheringization date (13 Grantees)
- Energy related repairs (6 Grantees)
  - **Possible measures:** minor structural repairs, mold/moisture control, electrical repairs
  - **Unallowable practices:** roof replacement, major construction
    - Important to base your program design on data ([deferral tracking](#)) and set cost or other limits on repairs.

# LIHEAP Transfer Rules – Mostly DOE

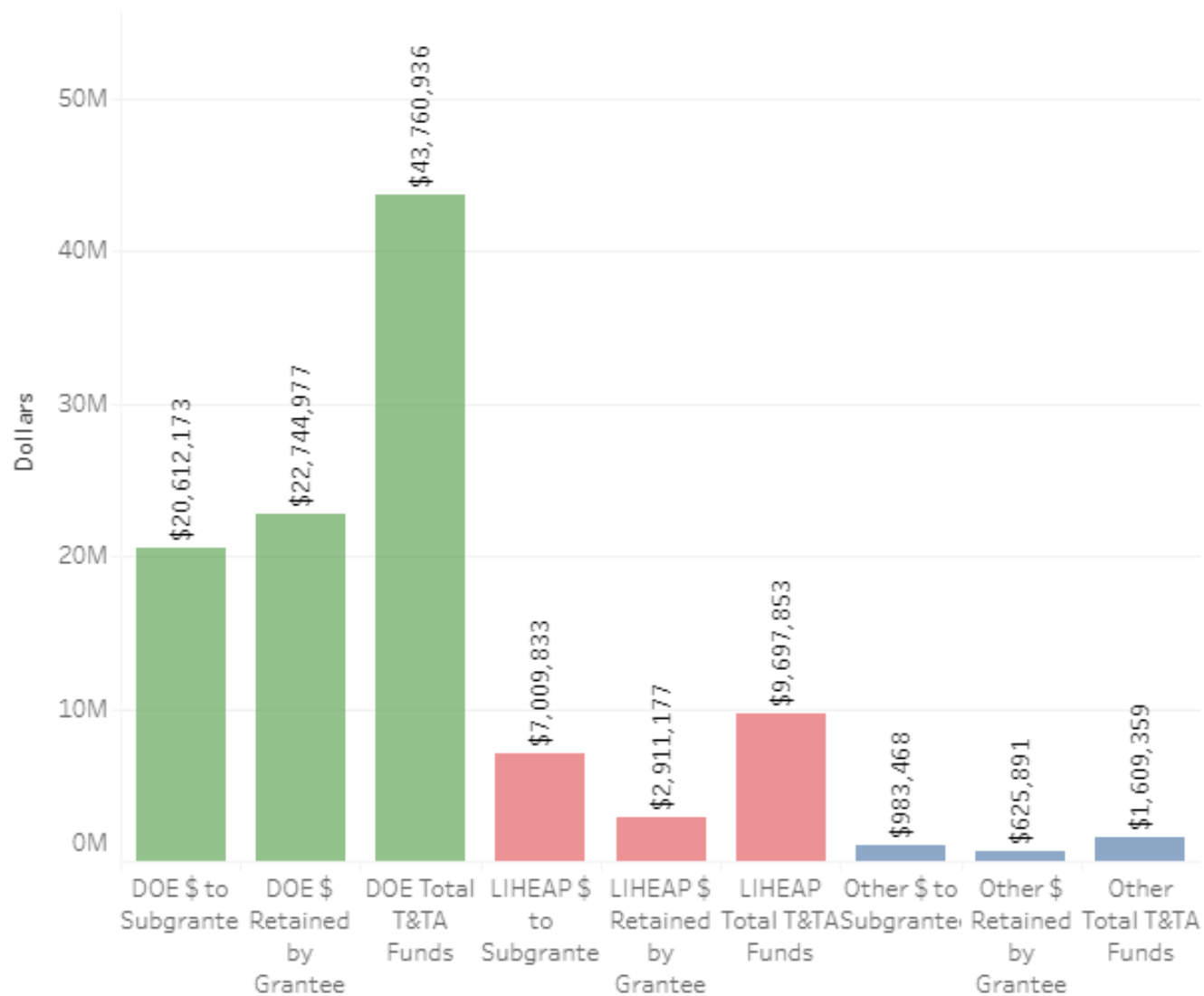
## Other DOE rule exceptions:

- No Health and Safety limit or higher H&S limit (8)
- No QCI required (3)
- No SIR or SIR <1.0 (3)
- Cook stove replacement allowed (3)
- No ASHRAE required

## Training

- If following Mostly DOE, use LIHEAP funds for training is allowed.


# 2019 WAP T&TA Funding



Source: NASCSP Funding Survey, <https://nascsp.org/wap/weatherization-publications/wap-annual-funding-surveys/>

# LIHEAP Plan – Section 5

## State following “Mostly DOE” Rules



<b>Benefit Levels</b>	
5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household? <input checked="" type="radio"/> Yes <input type="radio"/> No	
5.10 If yes, what is the maximum? \$11,500	
<b>Types of Assistance, 2605(c)(1), (B) &amp; (D)</b>	
5.11 What LIHEAP weatherization measures do you provide ? (Check all categories that apply.)	
<input checked="" type="checkbox"/> Weatherization needs assessments/audits	<input checked="" type="checkbox"/> Energy related roof repair
<input checked="" type="checkbox"/> Caulking and insulation	<input type="checkbox"/> Major appliance Repairs
<input checked="" type="checkbox"/> Storm windows	<input checked="" type="checkbox"/> Major appliance replacement
<input checked="" type="checkbox"/> Furnace/heating system modifications/ repairs	<input type="checkbox"/> Windows/sliding glass doors
<input checked="" type="checkbox"/> Furnace replacement	<input type="checkbox"/> Doors
<input checked="" type="checkbox"/> Cooling system modifications/ repairs	<input checked="" type="checkbox"/> Water Heater
<input checked="" type="checkbox"/> Water conservation measures	<input type="checkbox"/> Cooling system replacement
<input checked="" type="checkbox"/> Compact florescent light bulbs	<input checked="" type="checkbox"/> Other - Describe: Cook Stoves. Refrigerators require comprehensive metering of the existing unit to be performed or a NEAT run performed. Data will be submitted to IHCD for consideration. This is for LIHEAP and DOE.

# Braided WAP/LIHEAP Funds In a House Can Pay For...

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- Whole-House Energy Audit
- Measures installed to Standard Work Specifications(SWS)
- Final Inspection/Quality Control Inspection(QCI)
- Administrative Costs
- Training



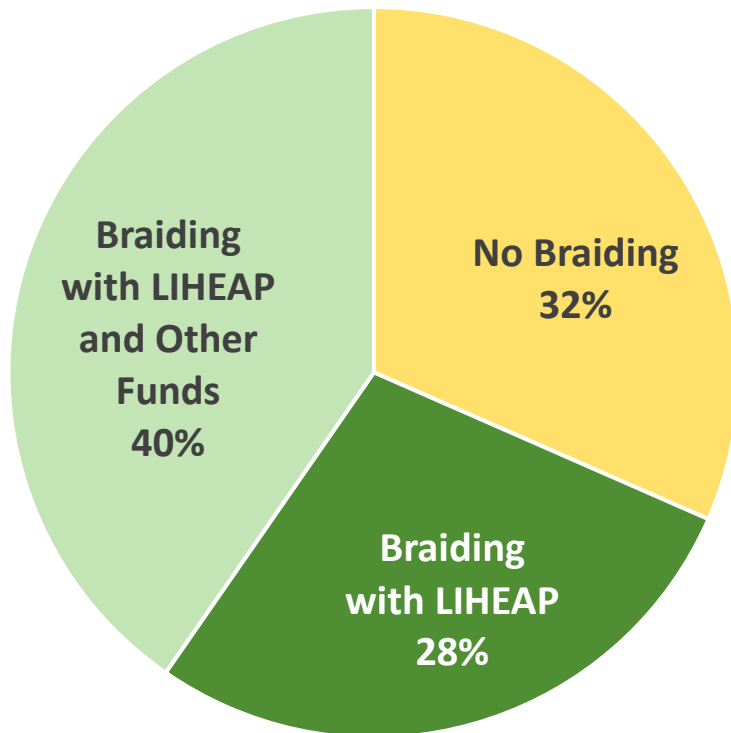
# LIHEAP Funds ONLY In a House Can Pay For...

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- Health & Safety measures not allowed in Weatherization Program Notice 17-7, such as cookstove replacements.
- Scopes of work that do not meet DOE guidelines, for example, Weatherization without meeting ASHRAE ventilation standards.

# Braiding Funds and ACPU

## Braiding DOE Funds



- **18 Grantees** reported No Braiding
- 9 of those Grantees exceeded the DOE ACPU as of February 2021

Source: NASCSP, [WAP Funding Report PY2019](#)

## Braiding Funds and ACPU



Air Sealing	\$500
Attic Insulation	\$1800
Sidewall Insulation	\$2500
Refrigerator Replacement	\$400
ASHRAE Ventilation	\$400
Energy Audit	\$400
Quality Control Inspection	\$400
<b>DOE Subtotal</b>	<b>\$6,400</b>
Heating System Replacement	\$2600
Roof Repair	\$300
Door Replacement	\$500
Other Baseload (Power Strips, LEDs)	\$300
<b>LIHEAP subtotal</b>	<b>\$3,700</b>
<b>TOTAL</b>	<b>\$9,900</b>

# Considerations for Braiding DOE & LIHEAP

- **Develop a strategy** for measure costing
  - **Provide guidance** to Subgrantees (e.g., funding matrix)
- **Maximize DOE** funds used in each home, staying within allowable average funds statewide
- **Cost Containment** – Set limits for jobs, measures and/or fund types (e.g., repairs, H&S, support)
- **Coordinate Outreach** – Prioritize applications for weatherization
  - Identify key indicators
  - Provide T&TA to LIHEAP staff
  - Co-branding



<https://www.lieapwyo.org/faq.html>

# LIHEAP Resources

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## **LIHEAP Homepage**

<https://www.acf.hhs.gov/ocs/low-income-home-energy-assistance-program-liheap>

## **LIHEAP Data Warehouse**

<https://liheappm.acf.hhs.gov/datawarehouse>

## **LIHEAP Training Resources (see weatherization webinars):**

<https://acf.hhs.gov/ocs/training-technical-assistance/liheap-tools-training-resources>

## **LIHEAP State Contacts**

<https://acf.hhs.gov/ocs/map/liheap-map-state-and-territory-contact-listingLIHEAP>

## **NASCSP Member Portal & NASCSP/NEUAC Fact Sheet**

<https://nascsp.org/wp-content/uploads/2020/08/FINAL-LIHEAP-Action-Day-WAP-2020.pdf>

## **NCAP – Leveraging the WAP**

<https://communityactionpartnership.com/energy-leveraging-the-wap/>

# Questions?

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- What materials or knowledge are you still looking for?
- What challenges do you encounter with program coordination?
- What is working well?

## **DOE Contact:**

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