Weatherization & LIHEAP Eligibility and Coordination

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MAY 2021
Overview

• 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

• 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

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 Mariana, 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

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.
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

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

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

<table>
<thead>
<tr>
<th>Program Components, 2605(a), 2605(b)(1) - Assurance 1, 2605(c)(1)(C)</th>
<th>Dates of Operation</th>
</tr>
</thead>
<tbody>
<tr>
<td>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.)</td>
<td>Start Date</td>
</tr>
<tr>
<td>Heating assistance</td>
<td>10/01/2020</td>
</tr>
<tr>
<td>Cooling assistance</td>
<td></td>
</tr>
<tr>
<td>Crisis assistance</td>
<td>10/01/2020</td>
</tr>
<tr>
<td>Weatherization assistance</td>
<td>10/01/2020</td>
</tr>
</tbody>
</table>

Provide further explanation for the dates of operation, if necessary

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

<table>
<thead>
<tr>
<th>Estimated Funding Allocation</th>
<th>Percentage (%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Heating assistance</td>
<td>57.00%</td>
</tr>
<tr>
<td>Cooling assistance</td>
<td>0.00%</td>
</tr>
<tr>
<td>Crisis assistance</td>
<td>8.00%</td>
</tr>
<tr>
<td>Weatherization assistance</td>
<td>15.00%</td>
</tr>
<tr>
<td>Carryover to the following federal fiscal year</td>
<td>7.00%</td>
</tr>
<tr>
<td>Administrative and planning costs</td>
<td>10.00%</td>
</tr>
<tr>
<td>Services to reduce home energy needs including needs assessment (Assurance 16)</td>
<td>3.00%</td>
</tr>
</tbody>
</table>
### Section 5: WEATHERIZATION ASSISTANCE

**LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)**

**MODEL PLAN**

**SF - 424 - MANDATORY**

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

5.1 Designate the income eligibility threshold used for the Weatherization component

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

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

5.3 If yes, name the agency.

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

<table>
<thead>
<tr>
<th># of Grantees</th>
<th>LIHEAP Eligibility</th>
<th>DOE Eligibility</th>
</tr>
</thead>
<tbody>
<tr>
<td>5</td>
<td>150% FPL</td>
<td>200% FPL</td>
</tr>
<tr>
<td>9</td>
<td>60% SMI</td>
<td>200% FPL</td>
</tr>
<tr>
<td>6</td>
<td>60% State Median Income (SMI)</td>
<td></td>
</tr>
<tr>
<td>30</td>
<td>200% Federal Poverty Level (FPL)</td>
<td></td>
</tr>
</tbody>
</table>
### 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
- [x] Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ (Check all that apply):
  - [x] Income Threshold
  - [x] 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
  - [x] 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 Ration (SIR) standards.
- [ ] Other - Describe:
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)
• Reweatherization 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

State following “Mostly DOE” Rules

<table>
<thead>
<tr>
<th>Benefit Levels</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household? ☑ Yes ☐ No</td>
</tr>
<tr>
<td>5.10 If yes, what is the maximum? $11,500</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Types of Assistance, 2605(c)(1), (B) &amp; (D)</th>
</tr>
</thead>
<tbody>
<tr>
<td>5.11 What LIHEAP weatherization measures do you provide? (Check all categories that apply.)</td>
</tr>
<tr>
<td>☑ Weatherization needs assessments/audits</td>
</tr>
<tr>
<td>☑ Caulking and insulation</td>
</tr>
<tr>
<td>☑ Storm windows</td>
</tr>
<tr>
<td>☑ Furnace/heating system modifications/repairs</td>
</tr>
<tr>
<td>☑ Furnace replacement</td>
</tr>
<tr>
<td>☑ Cooling system modifications/repairs</td>
</tr>
<tr>
<td>☑ Water conservation measures</td>
</tr>
<tr>
<td>☑ Compact florescent light bulbs</td>
</tr>
<tr>
<td>☑ Energy related roof repair</td>
</tr>
<tr>
<td>☑ Major appliance replacement</td>
</tr>
<tr>
<td>☑ Water Heater</td>
</tr>
<tr>
<td>☑ Cooling system replacement</td>
</tr>
</tbody>
</table>

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…

- 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…

- 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

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

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

NCAP – Leveraging the WAP
https://communityactionpartnership.com/energy-leveraging-the-wap/
Questions?

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

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