

LIHEAP 2023 MODEL PLAN COMMENTS & RESPONSES

	<u>Comment Date</u>	<u>Comment Method</u>	<u>Section of Model Plan</u>	<u>Commenter name & Affiliation</u>	<u>Comment</u>	<u>Response to Comment</u>	<u>Action Taken</u>
1	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	Heating Assistance is listed as beginning 12/05/22 does this mean mailouts or are you planning to change the opening date of the LiHEAP Winter program?	The process will be similar to what was done during FFY2022: mailouts can be sent beginning November 3,2022 with crisis processed at the same time as PEs if meeting the crisis definition. If PE data is not available by November 3, 2022, AEO will make the decision to start the program on January 9, 2023.	Heating, Cooling, and Crisis start dates are contingent upon receiving usable PE data on time. If not received on time Winter will be pushed back a month to January 9, 2023 and Summer will start using PE data from Winter.
2	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	Cooling Assistance is listed as beginning 07/10/23; does this mean mailouts or are the opening to the public	The process will be similar to what was done during FFY2022: mailouts can be sent beginning 06/12/2023 and crisis would be processed along with the PEs that were returned meeting the crisis definition. If PE data is not available by June 12, AEO will make the decision to start the mailouts using Winter's PE data.	Heating, Cooling, and Crisis start dates are contingent upon receiving usable PE data on time. If not received on time Winter will be pushed back a month to January 9, 2023 and Summer will start using PE data from Winter.
3	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	Crisis Assistance is listed as beginning 12/05/22; does this mean that we are no longer going to be allowed to open with regular or are your plans to continue to operate mailouts as crisis applications. If mailouts are no longer going to be treated as true mailouts and turn into long forms or at least the long form process, we will need additional time to process mailouts prior to the opening of the LiHEAP program to the public. This causes a huge administrative and programmatic burden on agencies.	AEO plans to include crisis applications when mailing PEs or opening to the general public. The process will be similar to what was done during FFY2022 where mailouts be sent out and crisis would be processed alongside the PEs that were returned meeting the crisis definition.	not changed
4	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	Comments-if you extend program time frames agencies will require more administrative and programmatic funds due to the additional workload, staff, space costs (rent, utilities, phone, etc.), administrative costs, etc.	There is a 10% federal cap on administrative funds. AEO fiscal team has found that not all agencies use their Administrative and Program Support funds completely. At this time AEO has decided to remain with the current 10% Program Support.	not changed
5	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	1.4 if these households are categorically eligible for regular assistance then we need to change the policy that indicates if there is a household size change that we are required to do a long form and they just need to be approved with a completed PE and their utility bill.	Review of policy for the 2022-2023 program is ongoing as per usual at this time in the program year; AEO is simultaneously reviewing changes to policy and will take this application issue into consideration.	policy updates underway
6	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	1.6 if it is kept that HH must complete a long form for change of HH size then should it be indicated here that, that is how we ensure fair treatment? OR is categorically eligible just categorically eligible and you can't deny them if they complete the PE and provide their bill?	See previous response.	policy updates underway
7	8/5/2022	email	Section 1—Program Components	Melissa Allen - CAPCA	In the box under SSA benefits-should one of these boxes be checked?	AEO inadvertently did not check the appropriate box in this section. AEO has checked the "Excluding Medicare deduction." This policy is consistent with SNAP eligibility determination standards.	Checked "Excluding Medicare deduction"

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8	8/5/2022	email	Section 2—Heating Assistance, 2605(b)(2)— Question 2.1 Eligibility Threshold	Melissa Allen - CAPCA	The comment for 2.7 seems to be worded incorrectly. We do referrals for the WX program; however, we do not replace HVAC units at the “clients requests”. It must be called for by the energy audit software. The way this sentence reads is that a client can ask for an AC and we will replace it. We don’t refer people to the WX program if we see a need, we do so at the client request.	Changed to read: The Weatherization Assistance Program (WAP) provides emergency weatherization services for households lacking heat or air conditioning. To provide these emergency services WAP is authorized to bypass waiting lists and priority points. If a household has previously been weatherized and is not eligible for re-weatherization, WAP is authorized to use LIHEAP funds to address HVAC only. This wording is consistent with policy issued by AEO 8/22/22.	Wording updated
9	8/5/2022	email	Section 3—Cooling Assistance, 2605(b)(2) — Question 3.1 Eligibility Threshold	Melissa Allen - CAPCA	The comment for 3.7 seems to be worded incorrectly. We do referrals for the WX program; however, we do not replace HVAC units at the “clients requests”. It must be called for by the energy audit software. The way this sentence reads is that a client can ask for an AC and we will replace it. We don’t refer people to the WX program if we see a need; we do so at the client request.	Changed to read: The Weatherization Assistance Program (WAP) provides emergency weatherization services for households lacking heat or air conditioning. To receive these emergency services WAP is authorized to bypass waiting lists and priority points. If a household has previously been weatherized and is not eligible for re-weatherization, WAP is authorized to use LIHEAP funds to address HVAC only.	Wording updated
10	8/5/2022	email	Section 10 — Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10, questions 10.3 and 10.9-10.12	Melissa Allen - CAPCA	Other program review mechanisms-my mind is drawing blank on this. Is this referencing that AEO enters into an eportal or is this something new we will do?	AEO has developed a new risk assessment tool, which we will train the CAAs on later this year.	not changed
11	8/5/2022	email	Section 10 — Program, Fiscal Monitoring, and Audit, 2605(b)(10) - Assurance 10, questions 10.3 and 10.9-10.12	Melissa Allen - CAPCA	10.6 4th sentence down change “ont” to not.	will change	changed
12	8/5/2022	email	Section 13 — Reduction of home energy needs, 2605(b)(16), questions 13.1-13.6 - Assurance 16	Melissa Allen - CAPCA	13.1-first paragraph, second sentence. Need a space between include and needs.	will change	changed
13	8/5/2022	email	Section 17 —Program Integrity, 2605(b)(10).	Melissa Allen - CAPCA	Social security cards are not copied and retained. Current policy allows “other verification of SSN” because copying a person’s SS Card puts agencies at risk. Will the policy be changing this year?	Added clarifying text: Applicants are required to present either the SS card or an official document that reflects the social security number. It is considered best practice to have the social security card copied in the file.	Checked the box that indicates that the social security number is "Requested" as opposed to "Required".
14	8/5/2022	email	MISC	Melissa Allen - CAPCA	Should the box be checked? Pg 41, 42 same as 38?	These pages are a part of the final certification. None of these pages will be completed until AEO submits the document.	

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15	8/5/2022	email	Section 1—Program Components	Elizabeth Roberson - ARVAC	<p>The scheduled start date for the 2023 Winter Program of 12/05/2022 is concerning for several reasons:</p> <p>The first being that with the start date earlier than ever before, and taking into account the significant issues that are still present in the 2022 Summer Program PE data, there will not be a sufficient amount of time for DHS to correct the data. With the multi-step process of the DHS data having to then go to AEO and then into the Strickland software, the process is lengthy and often requires multiple software revisions. We are concerned that the earlier start date will not allow sufficient time for this process and mistakes will be accepted as permissible once again. The mistakes in the 2022 Summer Program PE data have placed a significant burden on our outreach offices and our corporate LIHEAP department. This isn't something that we find acceptable and want to ensure that it is corrected before the new program begins. While we do want to assist our clients as quickly as possible, we also have a responsibility to protect our employees from unnecessary burdens that could be solved on the front end.</p> <p>The burden that the current data issues have caused on the Outreach and Corporate are defined as below:</p> <ul style="list-style-type: none"> • Household income amounts are incorrect on the PE, which has our Outreach and corporate staff having to resort to older data from the 2022 Winter Program table. • Staff are having to manually change the benefit amount on every application, which slows the application process down. This is in regards to the Outreach Offices, as well as, the corporate staff that are receiving the mail-ins from clients. • With household income and benefit amounts being changed on the majority of all applications, this is causing confusion and the potential for human error is greater. • Data entry has slowed down due to having to double check PE's on the income and benefit amounts. • When entering an application into the Strickland software, we are having to mark all applications as long forms in order to change the income amounts. The PE apps were originally simple to complete in data entry, as you only had to change the basic info changes of the household. With the issues we have been having, the PE forms are as lengthy as entering a long form. <p>The PE's were designed to make the application process go smoother for clients and employees. The incorrect data is causing a huge hardship on the employees, leading to additional frustration and errors that are not normally present. This is taking more staff time in the application process, approval process, and the data entry process.</p> <p>The second issue with the current proposed start date is that from our standpoint of having the mission to help our clients move toward self-sufficiency, we feel that having the start date prior to the Christmas holiday would encourage clients to negate their own responsibility towards their personal bills. It is our concern that funds that could have been used to pay for their own bills will instead be prioritized towards excess gifts or other non-essential items.</p> <p>The third issue with the start date of 12/05/22 is that this will put PE's being mailed out during the week of Thanksgiving, or the first week of mail outs coming in will be on the week of Thanksgiving. This will place a significant amount of stress on both the outreach staff and our corporate LIHEAP staff who will already be juggling covering extra offices for employees on vacation and holiday office hours. As stated above, our clients are extremely important to us, but ensuring the wellbeing of our staff is also a priority.</p>	<p><u>Response to Comment</u></p> <p><u>PE Data</u> The issue of obtaining PE data accurately and timely is one that we visit and attempt to explain often. In 2019, when LIHEAP moved to AEO, we began to contract with DHS to obtain that data. Many factors affect the accuracy and timeliness of receiving data; request date, system compatibility, system maintenance/ updates. Issues with all of these factors have been experienced over the last three years, which have caused bad data batches. So your concern is valid. AEO plans to update the request to DHS by clarifying the terminology as well as sending the request earlier than requested by DHS to meet our deadline.</p> <p><u>Early Opening</u> In December 2021, for the first time, LIHEAP opened in December instead of the usual January opening. AEO believes that the need in Arkansas is such that LIHEAP should open in December when cold weather has usually arrived. Closing before Summer is 2 1/2 months (May 1 - mid July) so, for consistency, closure before Winter would be October 1 - mid December. However, if AEO does not receive PE data timely and in usable condition, AEO will move the Winter opening date to January 9, 2023. This decision will be made by November 3, 2022. If Summer PE data is not available for mailing by June 12, 2023, AEO will authorize the use of Winter data.</p> <p><u>PE Mailouts</u> It is AEO's intent for PE data to be delivered to CBOs in a usable condition and an acceptable amount of time before the opening of the Winter program.</p> <p><u>Action Taken</u> Heating, Cooling, and Crisis start dates are contingent upon receiving usable PE data on time. If not received on time Winter will be pushed back a month to January 9, 2023 and Summer will start using PE data from Winter. (See responses for comments 1 & 2).</p>