



LANE COUNTY ENERGY ASSISTANCE PROGRAMS MASTER MANUAL

Program Year 2024



October 2023
V1
LANE COUNTY

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I. Programs

All of these programs are available on a first come, first served basis to qualifying Lane County residents. Lane County households can receive assistance from more than one of these programs in a program year. For example, a Pacific Power customer with natural gas could receive an OEAP payment and an OLGA payment.

A. LIHEAP

1. Program Description

LIHEAP provides home energy assistance to low-income Oregonians, especially households with the lowest incomes and the highest home energy need in relation to income. The purpose of this program is to supplement home heating costs. LIHEAP is a fuel blind energy assistance program provided on a first come first served basis. The LIHEAP program includes bill payment assistance, heating repair and replacement, and energy education.

- **Program year dates:** October 1st through September 30th
- No appointments will be scheduled after September 15th unless otherwise noted by LC staff

All Agencies participate in LIHEAP.

2. Eligibility

See *Section II.A.* for income eligibility.

See *Section IV.B* for eligibility criteria and unusual scenarios.

3. Payment Types

The payment types available for the LIHEAP program are the following:

- Regular
 - Direct – see *Section III.A.1.*
- Crisis – see *Section III.C.*
 - Crisis to put the utility account in a household member's name
- Combo
- Roomer/boarder – see *Section III.B.*
- Fuel
- Heat Crisis – HFG only
- Health & Safety – HFG Only

4. Mailout Applications

Households with a senior or disabled member who received a LIHEAP payment the previous program year receive a Mailout application the following program year.

Pre-Mailout Letter

- A pre-Mailout notice is sent to all households on the OPUS Senior or Disabled Mailout list prior to sending the Mailout application packet. The pre-Mailout notice should be mailed no later than October 1st.
- The Pre-Mailout notice may contain an energy education info sheet.*
- Agencies may add additional agency literature, but can only charge LIHEAP for the postage cost of a regular stamp.*

*NOTE: For PY24, Lane County Utility Assistance Programs will be mailing pre-Mailout notices. Additional literature normally sent with the pre-Mailout letters should be mailed with application receipts.

Mailout Applications

- LIHEAP agencies mail Mailout applications by October 15th.
- Date stamp the Mailout applications as they return.
- Sort the Mailout applications into two categories, those that have all the required documents, and those that do not.
- Mailout applicants have 2.5 months to submit their completed Mailout applications, mid-October, November, and December. If a Mailout household's application is incomplete by December 31, the household will have to place themselves on the LIHEAP waitlist if they still want assistance.
- If funds for the new Program Year have not been received by the state yet the agency should follow this procedure:
 - Process the payment and print the applicant's receipt but do not send the receipt.
 - The pledge report can be sent to the utility.
 - HSD authorizes the payment on paper only.
 - Once funds are received, HSD authorizes payments in OPUS and advises agencies to mail payment receipts. This could change on an annual basis.
 - Note: for Program Year 24, it has been decided by Lane County, intake agencies and local vendors to send receipts and pledges daily as payments are entered into OPUS. No delay is needed.
- We only process Mailout applications that are submitted by December 31. Mailout applications received by Dec 31 that are incomplete should be sent a Notice of Action right away. If the applicant does not complete the application by the NOA deadline, deny the application.

Mailout initial mailing includes:

- Instructions
- Application including LIHEAP disclaimer
- DHI – Declaration of Household Income
- Self-Employment Worksheet

NOTE: All forms are now one document.

Mailout application can be used if it contains:

Complete 30 days of income prior to processing. For example, if the Mailout is sent out on October 15, income can be a complete calendar month from September through December including any complete 30 days prior to data entry in OPUS. Cannot include income the household will receive after the intake date. Can include income received up until then. For example, if intake date is in February, income could be for January.

Mailout payment receipt mailing includes:

- Payment Receipt with Energy Education printed on the back
- Optional – agency literature

Intake date

This is the date the application is completed by the local agency.

Mailouts and Account Status

The Mailout application does not request the bill status. Agencies enter the bill status based on the energy bill provided or by calling the applicant's vendor to verify account status.

Denied Mailout Applications

On Mailout applications, write down clearly all of the income amounts and the total, so if it is denied due to being over-income, it is clear what the total household income amount is.

If the household's income is variable, let them know they can apply again if their income declines.

5. Opening Day

LIHEAP Opening Day

- The LIHEAP waitlist opens on the first working day of November
- All agencies are required to open their list at 9am unless otherwise arranged with the HSD Utility Services Supervisor prior to the start of the season
- Agencies do not accept names on their waitlist before normal working hours

See *Section V.D.* for more information on waitlists.

Voicemail greetings

- Voice mail greetings should provide a bilingual option in Spanish
- Request name, phone numbers, message phone number and utility company

B. OEAP

1. Program Description

OEAP is a low-income electric bill payment assistance program funded by and for customers of Pacific Power and Portland General Electric. The purpose of this fund is to effectively reduce service disconnections to those customers. The statute requires that priority assistance be directed to customers who are in danger of having their electricity service disconnected.

- **Program year dates:** October 1st through September 30th
- No appointments will be scheduled after September 15th

Participating Agencies

- Catholic Community Services
- Community Sharing

2. Eligibility

OEAP follows LIHEAP income guidelines. Social Security numbers are strongly encouraged but not required.

If an applicant's household includes someone enrolled in one of the following programs and provides documentation of their current enrollment to said program, the household will be eligible for OEAP.

Documentation of **current** enrollment in the programs listed in the table below must be an official document from the program source and may include any of the following: award letter, eligibility approval letter, SNAP screen printout, etc. Please Note: This is not an exhaustive list; we ask that you please talk with OHCS program staff on the use of non-routine documents to show current enrollment in any given program. Please be sure the documentation of enrollment clearly states a current date and the name of the person enrolled.

Low Income Home Energy Assistance Program (LIHEAP and E-LIHEAP)*	Federal Low-Income Weatherization Assistance Program (USDOE)*
Women, Infants and Children (WIC)	Supplemental Security Income (SSI)
SNAP (Food Stamps)	Medicaid/Oregon Health Plan
TANF or Tribal TANF	OEAP/CEAP

*If a household has received LIHEAP, E-LIHEAP, OEAP, CEAP, and/or US DOE weatherization assistance in the current program year or previous one program year, the household will be automatically eligible for express enrollment.

3. Payment Types

The payment types available for the OEAP program are the following:

- Regular
- Crisis
- Combo

4. Payment Details

Payments follow the same payment matrix as LIHEAP.

C. OLGA

1. Program Description

OLGA payments can only be applied to Northwest Natural accounts.

- The season begins in October and runs year-round
- **Program year dates:** October 1st through September 30th
- No appointments will be scheduled after September 15th

Participating Agencies

- Campbell Community Center
- Catholic Community Services
- Community Sharing

2. Eligibility

Follows LIHEAP income guidelines. Social Security numbers are not required.

The applicant must be the account holder.

3. Payment Types

The payment types available for the OLGA program are the following:

- Regular
- Crisis
- Combo

4. Payment Details

Follows the same payment matrix as LIHEAP.

5. Procedure

Agencies are required to call HSD for their authorization number upon determining a client's eligibility at intake. HSD needs to be updated on any payment changes the same week the application was processed. Final reports are sent to NWN on Monday morning. Applicants will be offered an ROI allowing agencies to gather household size and income to enroll in a tier-based bill reduction program through Northwest Natural.

Agencies must ask clients if they are disconnected at the time of the appointment. If they are, it is required to tell the customer to call NWN immediately to set up a reconnection appointment.

D. GAP

1. Program Description

GAP payments can only be applied to Northwest Natural accounts. The season begins in December and runs until funds are dispersed.

Participating Agencies

- Campbell Community Center
- Catholic Community Services
- Community Sharing

2. Eligibility

Follows LIHEAP income guidelines. Social Security Numbers are not required. The following groups are the target (priority) groups, but all are eligible:

- Senior
- Disabled
- Families with small children

Notice of disconnect not required, but client must have an amount owing.

3. Payment Types

The payment types available for the GAP program are the following:

- Regular

4. Payment Details

Payments are \$150 maximum (round up to nearest \$5). Northwest Natural encourages that we approve grants for less than \$150 when warranted.

Gas assistance funds can be applied to an active account or to reactivate an inactive account with an overdue balance.

5. Procedure

Agencies must call Northwest Natural if a client is shutoff and HSD to complete the GAP voucher. Applicants will be offered an ROI allowing agencies to gather household size and income to enroll in a tier-based bill reduction program through Northwest Natural.

Give a copy of the GAP voucher to customer. Send all other copies of vouchers to HSD.

E. ERAP

1. Program Description

ERAP payments can only be applied to EPUD accounts. The season begins in March and runs through November or until funds are dispersed.

Participating Agencies

- Lane County Human Services Division

2. Eligibility

Follows LIHEAP income guidelines. Social Security numbers are not required.

The household types that are eligible include the following:

- Senior (60 or older)
- Disabled
- Families with children under 6 years old (priority)
- Families with children 17 and younger

3. Payment Types

The payment types available for the ERAP program are the following:

- Regular

4. Payment Details

Payments are a set \$300 distributed in increments of \$75 over 4 months.

5. Procedure

HSD requests a list of EPUD households that meet the eligibility criteria from OPUS Help. Clients can also call HSD or apply online at <https://www.cognitofrms.com/LaneCounty1/epuderapapplication> to be added to the ERAP waitlist. These lists are merged and sent weekly to EPUD for approval of eligibility.

HSD mails applications or emails the application link to approved households. Households that have already received LIHEAP only need to sign and return the application. Remaining households must also provide income documents to prove income eligibility.

Once a complete application is received by HSD, payments are entered into OPUS and processed.

F. COVID Temporary Guidelines

OHCS is continuing the following temporary policies applicable to the Oregon Energy Assistance Program (OEAP) and Low-Income Home Energy Assistance Program (LIHEAP). These temporary policies have been adopted effective immediately to be responsive towards this emergent health crisis. OHCS and our partners must do what we can to minimize the spread of COVID-19 and protect the health of our clients, agency staff and OHCS staff. Lane County HSD is continuing these policies for applicants to OLGA and GAP as well.

1. Applications and Documents can be accepted via:

Mail, Email, Fax, Picture Text, and Phone

2. Signature Exception

Verbal signatures are allowed only if intake staff has read the entire disclaimer to applicants. The intake staff must sign the disclaimer with the following note: "Verbal signature by (intake persons name) on (date). This comment must also go on the payment screen in OPUS.

II. Income

A. Determining Income Eligibility

To be eligible for assistance, a household's gross income (total household income from all sources before any deductions) must be within the income guidelines provided by Oregon Housing and Community Services (OHCS) for each program year. See "*Income Guidelines*" Handout.

Eligibility for LIHEAP and other programs that follow LIHEAP is based on the following:

- All household income before any deductions (*gross income*)
- Number of household members

Households must provide documentation of their gross income for the eligibility period.

Please Note:

- **Income that exchanges hands within a household is not counted.**
Example: Bill lives with Mary and pays her cash for rent; the money he gives her would not be counted as income for Mary.

- **If the name listed on the income documents differs from the legal name(s), the reason must be documented in the comment section. All income documents must have the client's name on them, or be linked to a specific client in some form (SSN, etc.)**

B. Proof of Income

Count income for all household residents 18 years old and older. The following items are acceptable as proof (*verification*) of income. If other items are submitted, please check with your supervisor for approval.

All unearned income that comes to the head of household or adult household member, in the name of a minor household member, must be counted as income.

- **Adoption Assistance** – Official state and/or court documents.
- **Alimony** – Court order stating amount of support paid or received, written statement from person paying support, or if client is receiving support as part of an informal agreement and obtaining documentation creates a hardship on the client, a Declaration of Household Income (DHI) Form **must be** completed and signed.
- **Annuities** – Statement from the investment firm listing amount and frequency or bank statement (as a last resort).
- **Cash Gifts: Regular** – Written statement from person providing support, DHI form. Gifts given for three consecutive months or more will be counted as income.
- **Child Support** – Court order stating amount of support paid or received, documentation from the Department of Child Support, bank statement (as a last resort), Reliacard statement, written statement from person paying support; or if the client is receiving support as part of an informal agreement and obtaining documentation creates a hardship on the client, a DHI form **must be** completed and signed.
- **Contract for Deed** – Contract documents, receipts.
- **Disability Insurance (private)** – see “Private Disability Insurance and Gross Income” in section II.E.1.
- **Dividends** – Letter from corporation listing amount, bank statement.
- **Earned Income** – Wages earned through an employer: Wages, Salaries, Commissions, Bonuses, Profit Sharing, Tips, Vacation Pay, Overtime Pay, Severance Pay, Sick Leave. Wage stubs or statement from employer specifying gross wages (including cents) for one of the following time periods; one (1) month, three (3) months or twelve (12) months.
- **Foster Care** – Official state and/or court documents.
- **Informal Income** – Receipts, Declaration of Household Income (DHI).
- **Inheritance** – Letter, statement from lawyer, bank statement.
- **Interest** – Bank statement(s). Only if amount is over \$200.00 per year and is withdrawn.
- **Lump Sum Recurring** – See definition of type of income received for proof required if it is income received annually from the same source (e.g., wages, trust fund, etc.) Use OPUS income frequency “one time”.

- **Military Pay** – Official document(s) stating amount (e.g., leave and earnings statement, bank statement). When a household member is deployed, that person remains a household member. The deployed person’s gross income is counted as household income.
- **Pensions** – Statement from source, bank statement as last resort with documentation such as 1099R.
- **Rental Income** – Receipts, DHI, or self-employment form.
- **Retirement** – Statement from source or bank statement as a last resort with written justification.
- **Royalties** – Statement from source, bank statement.
- **Self-Employment Income** – Agency developed self-employment form.
- **Social Security Disability Insurance** – Official documentation for the current year such as the benefit verification letter from Social Security Administration (SSA). For more information about benefit verification, see [My Social Security](#). Note that deductions CAN be taken from SSDI.
- **Social Security retirement benefits** –SSA Benefit Verification letter for the current year. For more information about benefit verification, see [My Social Security](#).
- **Supplemental Security Income (SSI)** – SSI Benefit verification letter for the current year or bank statement as a last resort (because no deductions are taken from SSI).
- **Strike Benefits** – Copy of check, statement from Union.
- **Temporary Assistance For Needy Families (TANF)** – Documentation showing amount of assistance, ONE System screenshot from HSD.
- **Tribal per capita payments from casinos** – Statement from Tribe regarding payment amounts.
- **Trust Fund** – Letter, statement from lawyer, bank statement.
- **Unemployment** – Printout or statement from the employment office; ensure that gross weekly benefits amount is used to calculate income.
- **Veterans Benefits** – Benefit award letter, correspondence from the VA office, benefit payment check, bank statement.
- **Workers Compensation** – Benefit Statement, check stub or bank statement (as a last resort).
- **Work Study** – Pay stubs.

What Is Not Income:

- **Cash Gifts: Irregular** – Irregular cash gifts or payment on behalf of the household, includes loans and cash draw down on credit cards. Gifts given for three consecutive months or more *is* counted as income.
- **Child Tax Credit Advance Payments**
- **DHS cash assistance** – SNAP in the form of cash instead of food stamps.
- **Earned Income Credit (EIC)** – A tax credit for low-income households.

- **Employers paid fringe benefits** – Health insurance, retirement, etc.
- **Energy Grant(s)** – Money received under last year’s Low-Income Energy Assistance Program (LIHEAP), Oregon Energy Assistance Program (OEAP), or from private utility energy assistance programs.
- **Federal Disaster Payments** – Payments made by federal agencies under a residential declaration of disaster including, but not limited to, individual family grants from the Federal Emergency Management Agency (FEMA).
- **Food Stamps (SNAP)** – See SNAP.
- **Foster Grandparents Program** – A program for limited income people age 60 and older to serve as extended family members.
- **GI Bill** – Any of various Congressional bills, enacted to provide funds for college educational cost, which may include tuition, fees, books, and housing costs.
- **Home Ownership Voucher Program** – Section 8 Program. Payments may be cash payments or payments made on behalf of the household.
- **Income Earned by household members still enrolled in high school** – Income earned by household members eighteen (18) and over who are enrolled in high school.
- **Income Earned by minors** – Income earned by household members under the age of eighteen (18).
- **Income Not Counted by Law** – Income paid within the following programs:

Domestic Volunteer Service Act of 1973 (P.L. 93113)

Title I: Volunteers in Service to America (VISTA), AmeriCorps, University Year for Action (UYA), Urban Crime Prevention Program.

Title II: Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Older Americans Community Service Program (Senior Health Aides, Senior Companions).

Title III: Service Corps of Retired Executives (SCORE) and Active Corps of Executives (ACE).

Title V of the Older American Act: Experience Works, Senior Health Aides, Senior Companions, Volunteer respite care providers.

Title I of the Workforce Investment Act of 1998 (WIA): Supportive services to participants. Supportive services include assistance that enables people to participate in the program, e.g., transportation, health care, childcare, handicapped assistance, meals, temporary shelter, counseling, and other reasonable expenses or participation in the program. Exclude all WIA-supported income received by dependent household members who are 18 years old or younger or attending school K-12.

- **Indian Per Capita Judgment Payments** – Payments made to any Tribe or group whose trust relationship with the Federal Government has been terminated and for which Legislation in effect before October 12, 1973, authorized the disposition of its judgment funds.
- **In-kind Income** – Food or rent received in lieu of wages.

- **Job Related Expenses for Non- Self-Employed Applicants** – Business expenses comparable to self-employment, such as a salesperson, truck driver, cab driver, or mechanic.
- **Job Related Reimbursements** – Job related expenses such as mileage, meals, uniforms, medical expenses, etc.
- **Lump Sum: Non-recurring** – Income considered of a nature not likely to occur or happen again (i.e., lump sum insurance settlements, workers compensation settlements, lottery winnings, sale of property, house, or car, etc.).
- **Rebates and Refunds** – Income tax refunds, property tax refunds, renters’ refunds, security deposits of utilities and rentals.
- **Reverse Mortgage** – A mortgage in which a homeowner, usually an elderly or retired person, borrows money in the form of annual payments which are charged against the equity of the home.
- **Senior Companion Program** – A program which offers an opportunity for volunteers aged 60 and over to provide companionship and support to homebound adults, most of whom are also seniors.
- **SNAP** – Supplemental Nutrition Assistance Program – Formerly known as Food Stamps. Assistance given under a federal entitlement program to eligible persons for food at designated grocery stores or markets.
- **Student Aid** (see Work Study) – The full amount of all financial assistance paid directly to the student or to the educational institution. This includes: scholarships, grants, or loans.
- **WIC** – Benefits from the Women, Infant, and Children (WIC) Nutrition Program, Child Nutrition Act.

Complete Income Chart listed below:

Income types	Definition	Considered Income?		Proof of Income
		Yes	No	
Adoption Assistance	Financial assistance and medical coverage granted to an adoptive family to offset the short-and long-term costs of adopting an eligible child	X		Official state and/or court documents
Alimony	An allowance paid to a person by that person's spouse or former spouse for living expenses	X		Court documents, written statement from person paying support, DHI form
Annuities	A specified income payable at stated intervals for a fixed or a contingent period, often for the recipient's life	X		Statement from investment firm or bank statement (as a last resort)
Cash Gifts - Irregular	Irregular cash gifts or payment on behalf of the household also includes loans and cash draw down on credit cards. (Gifts given for three consecutive months or more will be counted as income)		X	
Cash gifts - Regular	Must provide regular support for an individual or for the household, paid directly to the household. (Gifts given for three consecutive months or more will be counted as income)	X		Written statement from person providing support, DHI form
Child Support	Money paid for the care of one's minor child. Include Child Support income that is provided to minors	X		Court documents, written statement from person paying support, DHI form, Reliacard statement or bank statement (as a last resort)
Contract for Deed	A land contract is a contract between a seller and buyer of real property in which the seller provides financing to buy the property for an agreed-upon purchase price and the buyer repays the loan in installments	X		Contract documents, receipts
DHS Cash Assistance (SNAP in the form of cash assistance instead of food stamps) (See also Food Stamps)	Cash assistance deposited directly into household bank account		X	

Income types	Definition	Yes	No	Proof of Income
Disability Insurance (Private)	Income payable at stated intervals for a fixed or a contingent period	X		Official documentation such as an award letter or benefit verification letter (see addendum at the end of Section Two for additional information)
Dividends	A sum of money paid to shareholders of a corporation out of earnings	X		Letter from corporation listing amount or a bank statement
Earned Income	Wages, Salaries, Commissions, Bonuses, Profit Sharing, Tips, Vacation Pay, Overtime Pay, Severance Pay, Sick Leave	X		Wage Stubs or statement from employer
Earned Income Credit (EIC)	A tax credit for low-income households		X	
Employers paid fringe benefits	Health Insurance, retirement, etc.		X	
Energy Grants	Money received under last year's LIHEAP, OEAP or from private utility energy assistance programs		X	
Federal Disaster Payments	Payments made by federal agencies under a presidential declaration of disaster		X	
Food Stamps (see SNAP) (See also DHS Cash Assistance)	Assistance given under a federal program to eligible persons for food at designated grocery stores or markets		X	
Foster Care	Payments made to foster families. Types of foster care: Family Foster Care, Special Rate Foster Care, Family Shelter Care, Relative Foster Care, Independent Living Program	X		Official state and/or court documents
Foster Grandparents Program	A program for limited income people age 60 and older to serve as a role model, mentor and friend for a small stipend		X	

Income types	Definition	Yes?	No?	Proof of Income
GI Bill	Any of various Congressional bills enacted to provide funds for college educational cost, which may include tuition, fees, books, and housing costs		X	
Home Ownership Voucher Program	Section 8 home ownership program		X	
ICP – Independent Choices Program	The Independent Choices Program (ICP) provides Medicaid recipients with monthly cash payments and to manage or self- direct their own care instead of receiving care services managed by the state. These monies are not to be considered income for the Medicaid recipient, but are considered wages for the person the Medicaid recipient is paying for their care		X	
Income Earned by household members still enrolled in high school	Income Earned by household members eighteen (18) and over, who are enrolled in high school		X	
Income Earned by minors	Income Earned by household members under the age of eighteen (18)		X	
Income Not Counted by Law- Domestic Volunteer Service Act	Title I: Volunteers In Service To America (VISTA), AmeriCorps, University for Action (UYA), Urban Crime Prevention Program		X	
Income Not Counted by Law- Domestic Volunteer Service Act	Title II: Retired Senior Volunteer Program (RSVP), Foster Grandparent Program (FGP), Older Americans Service Program (Senior Health Aides, Senior Companions)		X	
Income Not Counted by Law- Domestic Volunteer Service Act	Title III: Service Corps of Retired Executives (SCORE) and Active Corps of Executives (ACE)		X	
Income Not Counted by Law- Title V of the Older Americans Act	Experience Works, Senior Health Aides, Senior Companions, Volunteer Respite care		X	

Income types	Definition	Yes?	No?	Proof of Income?
Income Not Counted by Law – Title I of the Workforce Investment Act of 1998 (WIA)	Supportive services to WIA participants. Services include transportation, health care, childcare, handicapped assistance, meals, temporary shelter, counseling, etc.		X	
Indian Per Capita Judgment Payments	Payments made to any Tribe or group whose trust relationship with the Federal Government has been terminated and for which Legislation in effect before October 12, 1973 authorized the disposition of its judgment funds		X	
Informal income	Income resulting from occasional sources such as yard work, childcare, collecting bottles/cans, donating blood and/or plasma, etc.	X		Receipts, DHI
Inheritance	Property, monetary passing at owner's death to the heir(s) on a regular basis (not counted if one-time, lump sum payment)	X		Letter, Statement from lawyer, Bank Statement
In-kind Income	Food or rent received in lieu of wages			
Interest	The sum of money paid to one for the use of their money	X		Bank statement (only if amount is over \$200, and is withdrawn)
Job-related expenses for non-self-employed applicants	Business expenses comparable to self-employment, such as a salesperson, truck driver, cab driver, or mechanic		X	
Job related Reimbursements	Job related expenses such as mileage, meals, uniforms, medical expenses, etc.		X	
Lump Sum – Non-recurring	Income considered of a nature not likely to occur or happen again (i.e., lump sum insurance payments, workers compensation settlements, lottery winnings, sale of property, house, or car, etc.)		X	

Income types	Definition	Yes?	No?	Proof of Income
Lump Sum-Recurring	Income received annually from the same source (i.e., wages, trust funds, etc.) Use OPUS income frequency "one time"	X		See definition of type of income received
Military Pay	Benefits paid to a person who is serving in a military force	X		Official document(s) stating amount (e.g., leave and earnings statement)
Pensions	Assistance, paid at regular intervals to a person or to the person's surviving dependents in consideration of past services, age, merit, poverty, injury, or loss sustained, etc.	X		Statement from source, bank statement as a last resort, only if supported with client statement/documentation about any deductions (1099R is a good back-up for bank statement)
Rebates & Refunds	Income Tax rebates and refunds		X	
Rental Income	Income received from rental properties	X		Receipts, DHI, Self-Employment form)
Retirement	A monthly payment made to someone who is retired from work	X		Statement from source, bank statement- as a last resort only and must include written justification
Reverse Mortgage	A mortgage in which a homeowner, usually an elderly or retired person, borrows money in the form of annual payments which are charged against the equity of the home		X	
Royalties	A compensation or portion of the proceeds paid to an owner of a right, as a patent, oil, or mineral right, for the use of it or an agreed portion of the income from a work paid to its author, composer, etc.	X		Statement from source, bank statement.
Self-Employment Income	Income from a business, less business expenses	X		Agency developed Self-employment form and any supporting documentation that local agency may require.

Income types	Definition	Yes?	No?	Proof of Income
Senior Companion Program	A program which offers an opportunity for volunteers aged 60 and over to provide companionship and support to homebound adults, most of whom are also seniors		X	
SNAP (Formerly Food Stamps)	Supplemental Nutrition Assistance Program.		X	
Social Security Disability Insurance (SSDI)	<p>Social Security pays benefits to people who can't work because they have a medical condition that's expected to last at least one year or result in death. Federal law requires this very strict definition of disability. While some programs give money to people with partial disability or short-term disability, Social Security does not.</p> <p>Certain family members of disabled workers can also receive money from Social Security.</p> <p>NOTE: Deductions CAN be taken from SSDI.</p>	X		<p>Official documentation for the current year such as the benefit verification letter from Social Security Administration (SSA)</p> <p>For more information about benefit verification, see My Social Security or use this link.</p>
Social Security (Retirement Benefits)	<p>The Social Security Retirement Insurance Benefits are a federally funded program administered by the U.S. Social Security Administration (SSA). These are benefits that apply to individuals who have earned enough Social Security credits and are at least age 62.</p>	X		<p>Official documentation for the current year such as the benefit verification letter from Social Security Administration (SSA)</p> <p>For more information about benefit verification, see My Social Security or use this link.</p>
Supplemental Security Income (SSI)	<p>Supplemental Security Income (SSI) is a Federal income supplement program funded by general tax revenues (not Social Security taxes):</p> <p>It is designed to help aged, blind, and disabled people, who have little or no income; and</p> <p>It provides cash to meet basic needs for food, clothing, and shelter. (Note: no deductions are taken from SSI)</p>	X		<p>Official documentation for the current year such as a benefit verification letter from SSA, bank statement or as a last resort, SNAP documents may be used.</p>

Income types	Definition	Yes?	No?	Proof of Income
Strike Benefits	Benefit from Union Action	X		Copy of check, statement from Union
Student Aid <i>(See also Work Study.)</i>	The full amount of all financial assistance paid directly to the student or to the educational institution. This includes: scholarships, grants, or loans, or GI Bill funds		X	
Temporary Assistance For Needy Families (TANF)	A program which provides assistance to needy families so that children may be cared for in their own homes or in the home of relatives	X		Official documentation from TANF/DHS/SNAP office showing amount of assistance
Third Party Payments	Payment that goes directly to landlord, utility bill, etc. on behalf of the household		X	
Tribal General Assistance (Tribal TANF)	A program that provides assistance to Tribal families	X		Official documentation from a Tribal office showing the amount of assistance
Tribal per capita payments from casinos	Casino profits paid by a Tribe directly, including payments made to minors	X		Statement from Tribe regarding payment amounts
Trust Fund	Money, securities, property, etc. held in trust and received on a regular basis (not counted if one-time, lump sum payment)	X		Letter, statement from lawyer, bank statement
Unemployment Insurance	An allowance of money, usually weekly, to an unemployed worker by a state or federal agency	X		Printout or statement from the employment office. (Ensure that gross weekly benefit amount is used)
Utility Allowance	An allowance of money, usually monthly, used to subsidize a person's utility costs.		X	
Veterans Benefits	Benefits paid directly to a person who has served in a military force or a surviving family member	X		Benefit award letter, correspondence from the VA office, benefit payment check, bank statement

Income types	Definition	Yes?	No?	Proof of Income
Women, Infant, and children (WIC) Program	Women, Infants, and children (supplemental food program)		X	
Workers Compensation	Compensation for time lost due to a work-related illness or injury	X		Check stubs, statement from Workers Compensation, bank statement (as a last resort)
Work Study (See Student Aid)	The Work-Study program helps to provide graduates and undergraduates with part-time employment during the school year by paying a portion of the student's salary	X		Pay stubs

Employment

Enter into OPUS the employer's name in the Source/Employer Name field, the employer's phone number and physical address. If it is a large corporate employer, enter information for the specific location the person works at (i.e., Safeway on 18th Ave in Eugene, not Safeway Corporate headquarters in Texas).

C. Income Verification Time Periods

Income must be calculated using data from one of the following three time periods: one (1) month, three (3) months, or twelve (12) months. Within a household, if using monthly income, you must consistently use either one calendar month or previous thirty days. Count past income, do not project forward. **These time periods also apply to applicants who are self-employed or report zero income/irregular income on a DHI.**

Calendar Month

Lane County bases household eligibility on the last completed calendar month.

Other Allowable Timelines

It is allowable to use the last 30 days instead of the last calendar month if the applicant can't provide income documentation for the last calendar month but can for the last 30 days.

Monthly, Quarterly and Annual time periods can be used for income verification of households. The same time period must be used for all income reported in a household.

If you are using a time period other than previous calendar month, enter a comment in the Payment Comment box ("used last 30 days (9/15/22 - 10/14/22)". LIHEAP: If using the last 30 days for a Mailout application, write the comment on the Mailout comment field as well.

D. Income Certification

Household income must be certified at the time of intake (excluding supplemental payments). That certification is valid for a maximum of 60 days. Agencies may require income certification from all households more often. Certification timelines must be consistent for all households, and all completed file requirements (as outlined in *Section VI.C.8.*) must be followed.

If the applicant household changes dwellings during the 60-day recertification period, repeat the intake process to collect data on the new residence and new utility account number but not on the income eligibility.

E. Calculating Income

Determination of income is based on all household income ***before any deductions*** (this is known as **gross income**). (See Section B "*Proof of Income*" above.)

Income must be calculated/entered exactly; do not round up or down, include cents, do not project or average income.

Amount: Household income must be documented and verified. If the household has more than one income source, list each source individually and OPUS will total the income in the Annual Amount column. Income documents must be connected to a household member with their name written on the document. Employer name, if applicable, must also be on the document.

Frequency: At a minimum, verification must be collected for at least one consecutive month or 30 days of income, but may be collected for the quarter or year.

Annual Amount (calculated by OPUS): Total calculated income for the year (i.e., monthly amount multiplied by twelve (12) for annual income, quarterly amount multiplied by four for annual income).

NOTE: Income that exchanges hands within a household is not counted.

1. Private Disability Insurance and Gross Income

Gross income is defined as "total household income from all sources before any deductions".

An exception to this definition is with regard to certain private disability insurance payments. While the terminology and the format of the document(s) will vary between insurance companies, if we count the gross amount from the insurance company and we also count the Social Security benefit, we may be counting the Social Security benefit twice.

In some insurance documents the maximum amount the client can receive may be referred to as the "*gross amount*" or "*gross benefit*" or "*total benefit.*" There may also be a deduction for a Social Security amount referred to as an "*offset*" or "*deduction*" and then an "*adjusted net*" or "*net benefit amount.*"

In these specific cases, the only way to get the correct gross income amount may be to use what's often referred to as the "net" amount by some insurance companies. However, clear documentation is essential in determining accurate income for the household. It is also important to note that the amount of the "offset" or "deduction" in the insurance documents must match the amount in the SSA benefit verification letter.

The examples below were taken from actual client files:

a) Example A

Client A receives a gross monthly benefit of \$1,166.39, less a Social Security offset in the amount of \$847.00 resulting in a net monthly benefit of \$319.39. Client A also presents a benefit verification letter from the Social Security Administration showing a benefit of \$847.00.

Under the current policy, we would use the gross amount of \$1,166.39 and add the SS income of \$847.00 for a total gross income amount of \$2,013.39.

In this case, however, this would be double counting the Social Security benefit. The maximum the client will ever receive from both sources is \$1,166.39; so, this is the amount that should be used to calculate the appropriate energy assistance benefit.

b) Example B

The disability insurance benefit for Client B is determined as follows:

\$1,786.15	Gross Monthly Benefit
-\$825.00	Deduction for Social Security Disability
-\$414.00	Deduction for Dependent Social Security Disability
+\$162.18	Cost of Living Adjustment
= \$709.33	Monthly Benefit Paid

In this example and under the current policy, we would add the gross amount of \$1,786.15 and the \$162.18 Cost of Living Adjustment for a total of \$1,948.33. Because we also have Social Security benefit verification letters, we would add the Social Security benefits of \$825.00 and \$414.00 for a total gross income from both sources of \$3,187.33.

Here again, this would be double counting the Social Security benefits. The maximum the client will ever receive from both sources is \$1,948.33 (\$1,786.15 + \$162.18). This is the amount that should be used to calculate the appropriate energy assistance benefit, since the Social Security letters show the same benefit amounts as those listed on the disability benefit letter.

F. Declaration of Household Income (DHI)

Each household applying for assistance must provide documentation of income. Household members 18 years old and older claiming no income or irregular income must be listed on a signed DHI.

This form must be used for the following circumstances:

- A household member has no income.
- A household member whose irregular income is the result of occasional work such as mowing lawns, childcare, selling plasma, collecting cans/bottles, or a household whose income is from an informal child support or spousal support agreement.
- Regular cash gifts – gifts given *three consecutive months or more* will be counted as income.

At a minimum the form must contain:

- Applicant's name,
- Name of adult HH member(s) claiming zero or irregular income,
- Amount and type of income (if applicable),
- How long the adult has been without income (if applicable),
- The month/time period for which information is being collected,
- A brief description of how basic needs (shelter, utilities, food) are being met,
- A statement certifying accuracy of information,
- An applicant's signature and the date signed.

Multiple members of the household claiming non-documented, or zero income should be listed on one DHI form. The applicant or any adult household member may sign the form for all household members.

Lane County may require applicants and/or households claiming zero income to submit additional information.

- Intake workers ask the applicant the questions on the DHI form and write the applicant's responses unless the form was included in a Mailout application. If included in a Mailout application or online application, if the questions are not completed, intake staff will need to call the applicant to finish filling out the DHI.
- Agencies are responsible to translate responses to the DHI questions into English. Google Free Translation is a helpful resource.

G. Self-Employed Clients

For applicants 18 years old and older who are self-employed, income should be based upon the adjusted gross income remaining after the cost of doing business during the previous month or other date range being used for the household. Business expenses include all costs necessary to maintain the business.

Previous year's losses or expenses are not allowed to be carried forward.

Intake workers should complete the Self-Employment form for all self-employed applicants (including those landlords who own rental properties) unless it is a Mailout or online application, in which case the applicant should complete the form.

Lane County does not require additional supporting documentation, but if provided by the client it should be included with the application. Remember to redact the account numbers on personal checks, if submitted as back up to self-declared income.

H. Social Security Income

For intakes from October 1st to January 31st use the 2023 Award Letter. For intakes from February 1st to September 30th use the 2024 Award Letter. Always use Gross benefit including the cents.

Withholdings:

- Add Medicare deductions back in
- Add overpayments back in
- Add garnishments for child support, alimony, or restitution back in

The SSA office phone # in Eugene is 1-866-563-3450. Online access to benefit letters is [My Social Security](#).

Calculator for Social Security Retirement Benefits

The approved Social Security calculator provided by OHCS can only be used for intakes done in the months of December 2023 and January 2024 and only if the applicant is unable to get a copy of their benefit letter via mail, online, phone, or in an office and did not use the calculator in PY23.

If the calculator is used, a copy of the calculator must be printed and included in the client file in addition to whichever benefit verification letter was provided by the client. In OPUS, the income verification drop down box must show that the calculator was used and must also include a brief description as to why it was necessary. A comment must also be entered in OPUS Payment Comments.

Income received on behalf of a child (child support, Social Security, etc.) is entered as income for the adult who is receiving it.

I. Taxes

Tax forms can only be used to verify income during the month of January, during which they must be used for the prior calendar year's *annual* income. All income sources and household members must then provide income verification for the prior calendar year.

J. Online Income Documentation – Print Screens

1. The One System

The HSD has access to the Department of Human Services (DHS) food stamp screens for households enrolled in the SNAP program. Intake agencies may call HSD staff to look up applicant household TANF income, addresses, birthdates, and OHP status. SNAP, OHP and TANF can be used for OEAP in lieu of income eligibility.

For Department of Human Services (DHS) income, like TANF, if the client doesn't provide valid documentation, you must use a ONE System screenshot from HSD for TANF verification. Do not send applicants to DHS to obtain income verification.

DHS provides a Basic Decision Notice for DHS income (TANF) but we can't use this.

It is okay to mix ONE System verification and actual income documents for income verification of individuals. For example, a person with TANF and employment income would use ONE System for TANF and paycheck stubs for employment income.

2. Bank Statements and Unemployment Statements

It is acceptable to use statements printed from the official website of the source as income documentation. If the printed statement does not contain identifying information i.e., full name, address, etc., the applicant or intake worker must write on the statement, the name of the person to whom the statement belongs.

III. Payment Types

A. Regular/Standard Payment

The standard energy assistance payment for LIHEAP and programs that follow LIHEAP is determined by the Benefits Matrix provided each program year. Households who receive a regular payment are not required to have a past due notice, shut-off notice, nor do they have to have an empty (or almost empty) tank.

All households must demonstrate an energy burden using acceptable forms of documentation. Applicants residing in subsidized housing with energy costs included in rent are not considered vulnerable to rising energy costs, and therefore are not eligible.

Standard oil payments must apply at least 75% of payment to oil.

1. Direct Payments

Direct payments are only allowable in LIHEAP.

Wherever possible, energy assistance benefits should be provided directly to the utility or vendor. However, in some cases, energy assistance benefits must be paid directly to the household.

Direct household payments should only be used in the following cases:

1. Payments to renters whose heating cost are included in rent or who pay heating costs directly to their landlord. A Landlord letter, rental agreement or lease must be provided for verification.

Landlord letters and wood receipts

- If an Applicant is providing a landlord letter or a wood receipt for a direct payment, the Intake Worker is **required to call** the landlord or wood vendor to verify the authenticity of the letter/receipt and signature.
 - The Intake Worker must write a note on the letter or receipt with the date of the phone call and with their (Intake Worker's) initials. The same note is entered into the OPUS Payment View screen comment field. For example, "12/29/22 Direct payment because heat included in rent per Landlord letter. Called landlord 12/29/22 to verify signature on form. BNA"
 - Rental agreements do not require a phone call to the landlord.
2. Households who utilize home energy suppliers without a current, signed vendor agreement are eligible for direct payment.
 3. For certain bulk fuel (e.g., wood, pellets, propane) situations:
 - a) All effort must be made to pay a contracted bulk fuel vendor. This may be a vendor contract that is modified or pared down from the State Provided Template.
 - b) If there is no vendor contract in place, all effort should be made to use standardized receipts/documentation for Direct Payments for Bulk Fuels. This includes Name of purchaser, items to be purchased, cost of items, and vendor information (Name, phone, date of sale, and address). This "receipt" could be completed prior to or after purchase, depending on local agency policy.

- c) If a client has pre-purchased bulk fuels, and has difficulty obtaining/completing the above documentation, a Direct Payment can be made if current or previous one heating season receipts are provided. *Using prior heating season's receipts as documentation—if a client resides at a different address than is noted on the receipt or reported in a prior year, proof of heating fuel at the current residence will be required.*
- d) If a client is unable to pre-purchase bulk fuel for reimbursement, a quote will suffice for documentation. Quotes must be from the vendor and/or verified by the intake worker. Quotes must include at a minimum: name of vendor, name of vendor rep. providing quote, date, name of client, delivery or service address, amount of goods to be purchased and cost. Intake staff are required to complete a Lane County Non-Contracted Vendor Verification Form for quotes.
- e) Agencies are encouraged to only pay for the amount of bulk fuel listed on the receipts up to the standard payment benefit and apply any remaining benefit toward an alternate energy source. If no alternate energy source is available, a direct payment **must** be issued for the entire benefit.

2. Standard Benefits and Primary Heating Source

LIHEAP only

In cases where none of the energy assistance benefit will be directed toward the primary heating source (indicated in OPUS): The standard benefit must be based on the energy type where the majority of assistance will be applied. If splitting the payment equally, the payment must be based on the primary heat source.

Examples of circumstances where this may occur:

- A household's primary heat source is oil – however, they were able to pre-purchase a full tank during the summer and need electricity to utilize heating systems.
- A household is on a time payment plan with their primary heating source and need a secondary energy source paid in order to heat their home.
- The account for the primary heat source is current and the secondary source is at risk of disconnection.

B. Roomer/Boarder Payment

If some household members are not interested in applying for LIHEAP or do not want to apply together, the roomer/boarder may each apply separately, as an individual household.

A roomer/boarder is a person who rents a room from the building owner. A roomer/boarder does not have a separate site address from other occupants of the building—however, a roomer/boarder does not share in providing, or being provided for, the necessities of life (e.g., food, living costs) with other residents of the structure.

Roomer/boarders cannot apply for a roomer/boarder payment if they are related to each other or to their landlord.

If there are multiple roomers, they need to apply together for a roomer/boarder payment. They cannot each apply individually for a roomer/boarder payment. The roomer/boarder listed as the applicant will receive the direct payment unless the utility account is in their name, in which case payment goes to the utility.

In these types of situations, the applicant is eligible to receive 50% of a regular payment based on the Benefit Matrix (see roomer/boarder definition in *Section VI.B.2.*).

Requirements:

- Call the HSD Utilities Program Services Coordinator to consult on each roomer/boarder payment.
- Comment required in OPUS Payment View field. Explain why the situation meets the roomer/boarder definition.

Households who receive a roomer/boarder payment are still eligible for a crisis payment. If the applicant is not the person on the utility bill, the payment will be a direct payment.

C. Crisis Payment

An existing crisis may be alleviated by a payment in the amount of up to \$750 for LIHEAP and \$2500 for OEAP, based on actual need. Households must have received a regular payment prior to receiving crisis payment (See *Section IV. on Crisis Payments*).

D. Combo Payment

A payment made on behalf of a household to prevent disconnection, facilitate reconnection or replenish fuel supply. A combo payment is issued as a regular and a crisis payment at the same intake appointment. The amount may not exceed the total of a regular payment plus the maximum crisis payment. Like a crisis payment, a combo payment should reflect actual need.

E. Fuel Payment

LIHEAP only

For those households where a standard benefit will not cover minimum delivery requirements (oil, propane, wood), a fuel payment may be issued for up to \$800. This type of payment is an alternative to regular/standard benefits and should only be used when circumstances require.

Intake workers should ask the applicant the following questions:

1. Will the household need to have the fuel delivered?
 - a. Yes – call the vendor to verify delivery cost and do a Fuel Payment
 - i. Please note that not all vendors offer delivery
 - b. No – do a standard payment
2. Is the household out of fuel?
 - a. Has fuel – Use Bulk Fuel as account status
 - b. Out of fuel – Use Bulk Fuel Out as account status

A fuel payment cannot be split between vendors. Households who receive a fuel payment are still eligible for a crisis payment.

Comment required in OPUS Payment View screen. Explain why the applicant is receiving more than a regular payment. For example: "12/29/22 Fuel payment because oil company won't fill up applicant's oil tank for standardized oil payment amount from Benefit Matrix. BNA"

F. Supplemental Payments

HSD use only.

Some CAP agencies may opt to provide payments to households in addition to the benefits listed above. These could include, but are not limited to: incentives, co-payments, emergency relief, or targeted assistance. CAP agencies wishing to utilize this payment option must have approval from OHCS within their local work-plan.

IV. Crisis Payments

A. Crisis Definition

For the purposes of energy assistance, a “crisis” is generally defined as an event, typically unexpected or sudden, beyond the control of the applicant that occurs in a household, resulting in their inability to pay their energy costs.

Lane County will provide immediate access to regular LIHEAP payments and LIHEAP crisis payments or a comparable local program to prevent shut offs or restore energy service to households that meet the criteria.

B. Criteria

Criteria that do qualify as emergencies are:

- Medical equipment that requires the maintenance of energy service
- Medical condition that requires energy service in order to maintain life
- Hospice care
- Death of a household member
- Sudden loss of job, public benefits, or other income
- Domestic violence
- Other situations that may pose a potential health and/or safety threat with approval of HSD’s Program Services Coordinator

Additional Requirements:

- The household is at risk of loss of energy service within one week or less, or has lost energy service due to lack of payment, and
- The benefit or a combination of the benefit and a household payment are sufficient to alleviate the crisis, and
- The household has made a payment of at least \$25 on their current home energy bill(s) within the last 90 days, and
- The crisis criteria that qualifies the household for a crisis payment occurred or existed within the last 90 days

Criteria that do not necessarily qualify as a crisis are:

- Medications that need refrigeration
- Chronic, on-going situations
- Chronic inability to pay bills
- Unexplained or excessively high energy costs
- Other situations which are not sudden, unexpected or beyond the control of the household

While a household must have exhausted a regular benefit prior to receiving a crisis benefit, an agency may provide both simultaneously (see Section III.D. “Combo Payments”).

Chronic Crisis

A household can only use the same crisis criteria up to two times. Chronic crisis no longer falls into the definition of “unexpected or sudden”; it is then a predictable circumstance that the household encounters.

Intake workers should review past Combo and Crisis Payments to be sure the same criteria is not used more than twice. If so, the criteria is invalid and the client cannot use the crisis criteria to be served ahead of

those on the waitlist or to receive more than a Regular/Standard Payment.

Clients should be advised of this anytime they receive a payment with crisis criteria.

Approval and Additional Services

Intake agencies are empowered to process and pledge crisis payments when they determine and document that the required criteria and all additional requirements are met. The HSD Utility Program Services Coordinator, or their designee, reviews and approves all crisis payments.

C. Crisis Payment Amounts

Lane County will use crisis funds to cover up to the full amount owing on a household's bill, not to exceed \$750, at the time of crisis payment approval. Lane County will not create a positive credit balance of more than \$5 on an account due to a crisis payment.

Crisis payments should reflect actual need and, with the exception of prepaid accounts, should only result in a credit if well justified. (For prepaid accounts, it is understood that any payment will result in a credit; for more on Prepaid accounts see section H below.) Justification for the crisis benefit and amount must be documented, particularly when the payment will result in a credit on a non-prepaid vendor/utility account.

As with standard benefits, CAP coordinators are encouraged to contact the State Energy Assistance Coordinator if they feel extreme circumstances warrant an exception to the maximum benefit guidelines.

1. Regular Payment to Alleviate Crisis Conditions

If a household meets the crisis criteria, and a regular payment will alleviate the crisis situation, the Intake Agency will only provide a regular payment. The intake worker will write "Crisis Criteria" in the upper lefthand corner of the application, which indicates it meets crisis criteria and has crisis documentation attached but is a regular payment. The household may qualify for a crisis payment later in the utility assistance program year.

D. Availability

The crisis component of the Lane County Energy Assistance Programs begins December 1st and lasts through March 15th. If funding is available for crisis services prior to December 1st and/or after March 15th, Lane County will attempt to address these situations, but will not guarantee it.

1. Multiple Crisis Payments within Single Program Year

A household will be eligible to receive no more than one crisis payment per program year and per program that have a crisis payment component. In other words, if eligible, a household can receive a crisis/combo from each program that offers crisis payments. These programs are:

LIHEAP	Low Income Home Energy Assistance Program
OLGA	Oregon Low Income Gas Assistance
OEAP	Oregon Energy Assistance Program

Note: If the household has already received a regular payment from any of the programs that provide crisis payments, then it is generally preferred that you provide the crisis payment from that program.

However, there is flexibility in providing a crisis payment, or a regular payment that addresses the crisis criteria, from a different program in order to best address the crisis situation of the household.

E. Documentation Requirements

Intake workers must complete the Lane County Crisis Intake Form in its entirety. This form is to be used as a checklist for all the requirements of a crisis criteria, crisis or combo payment and requires a call to the utility company or vendor. In addition, documentation of the crisis criteria that meets the requirements listed in above section B must be provided as listed below.

1. Acceptable Criteria Documentation

Must be provided by a third party (not the household or the energy assistance intake agency). The following are examples and not an exhaustive list of acceptable documentation.

- Medical equipment
 - Utility form
- Medical Condition
 - Utility Assistance Health Jeopardy Form
- Hospice
 - Letter from Hospice provider organization
- Death of household member
 - Death notice
 - Death certificate
 - *Documentation must show person was in the household
- Sudden unexpected loss of income
 - Lay-off notice
 - Notice of termination of income benefits
- Domestic Violence
 - Police Report
 - Restraining order or court documents
 - Statement from a domestic violence support agency (SASS, Home and Safety Alliance – *formerly WomenSpace*, etc.)

Please Note: Do not enter anything in OPUS regarding domestic violence criteria. Simply state in OPUS that the household meets crisis criteria, and the details are on the paper application. Write the domestic violence criteria on the paper application and attach the back-up documentation to the paper application.

2. Comment required in Payment View Screen

Explain how the applicant has met all of the required crisis criteria. For example “12/29/22 Scheduled for shutoff 1/2/23, meets health jeopardy criteria. Last payment 12/1/22 of (at least \$25), total owing \$321.12, crisis payment of \$325 will prevent shutoff. BNA”

F. Life-Threatening Crisis

A life-threatening crisis exists when the health and/or well-being of the household member(s) would likely be endangered by the interruption of heating or cooling energy services. Generally, this would require an active medical certificate but may be deemed a life-threatening crisis by the local service provider if extreme circumstances are present. Example: Extreme cold or heat, supply shortage of deliverable fuels, etc.

In addition to the above, the household must either be disconnected or at imminent risk of disconnection (within 7 days of application) to be considered as having a life-threatening crisis situation. Households with deliverable fuels must either be out of fuel or at imminent risk of being out of fuel.

Life-threatening crisis situations (medical equipment, a medical condition or hospice care) must be addressed within either 18 (if already disconnected) or 48 (at risk of disconnection) hours of application.

These timeframes must be documented in OPUS in the Payment Screen to ensure compliance with the federal requirement and must include comments outlining the steps taken to alleviate the shut off situation from the point in time the household met all crisis criteria.

Agencies are authorized to provide any of the following forms of assistance, or a combination thereof which best resolves a given emergency situation:

- Bill Payment Assistance
- Heating or cooling system installation, repair, or replacement – includes repair, replacement, or conversion of inoperative, non-functional, or unsafe household heating or cooling equipment necessary to alleviate a potential energy crisis. When considering equipment installation, repair, or replacement, considerable effort should be made to supplement LIHEAP funds with other leveraged resources.
- Other Equipment Repair/Replacement – includes repair or replacement of inoperative, non-functional, or unsafe household appliances/equipment necessary to alleviate home energy crises. When considering equipment repair or replacement, considerable effort should be made to supplement LIHEAP funds with other leveraged resources.
- Other Emergency Services – including, but not limited to information, referral, coordination of benefits, advocacy, case management and/or other goods and services necessary to relieve immediate threat to health and safety.

The maximum benefits payments for crisis assistance are:

Year-Round Crisis Energy Assistance	\$750
Non-Furnace Health and Safety	\$1000
Heating or Cooling Equipment Installation, Replacement, or Repair	\$7000

In the event of household energy-related emergencies, in-kind benefits may be used to augment crisis assistance. These include, but are not limited to sleeping bags, clothing, blankets, and emergency disaster kits.

G. Crisis Payment to Put Account in Household Member's Name

LIHEAP Only.

If a LIHEAP applicant household is avoiding putting the bill from an existing account in a household member's name to avoid a deposit and/or the discovery of an unpaid bill on an old account, Lane County may provide a crisis payment towards the new deposit and/or unpaid bill if it will be transferred to the new account in a current household member's name. The combination of the regular and crisis payment cannot create a positive credit balance of more than \$5.

Examples of situations that will meet the above crisis criteria are:

- Parent has the account in a child's name because the child has a clean credit history
- Widow or widower who has kept deceased spouse's name on the account because to transfer the account into their own name would incur a deposit
- Account is in the name of an ex-roommate who no longer resides in the household

1. Criteria

- Household has an active, current account
- The current account is in the name of someone who doesn't reside in the household
- Household will incur a deposit and/or the utility will discover an old unpaid debt from a closed account if current account is transferred into a household member's name

Additional Requirements

- The benefit or a combination of the benefit and a household payment are sufficient to cover the deposit and/or unpaid bills and allow the household to afford to put the account in a household member's name
- The household has made a payment on the home energy bill in the last 90 days of at least \$25.

Circumstances that do not qualify under the above crisis criteria are:

- Customer is opening a new account in his or her name and gets a deposit based on normal deposit criteria i.e., poor credit history or no credit history
- Existing customer has a deposit applied to the account due to recent poor payment history
- Customers who are unable to place the account in their own name i.e., landlord requires the landlord's name as account name

2. Documentation Requirements

- Proof of current, open account in a non-household member's name
- Utility verification that the transfer of the account to a current household member's name will result in deposit and/or old unpaid bill applied to new account
- Crisis Intake Form

H. Pre-Paid Accounts

It is allowable to create a positive credit balance with a crisis payment on pre-paid accounts. These customers will not have an amount owing.

To determine the amount of a crisis payment, contact the utility and determine the cost of the energy used in the last month. The amount of the crisis payment can be two times this amount, or 60-days of usage. If the intake staff believes a different amount is more appropriate, contact the HSD Energy Services Supervisor for consultation and approval. Include calculation of crisis payment amount in the Payment Screen comments field.

I. LIHEAP Climate Crisis (formerly Heat Crisis)

1. Referrals

Intake agencies refer households with a potential climate crisis to the Homes for Good (HFG) Intake Coordinator (Ryan Smith, rsmith@homesforgood.org). Describe the problem in the email or voice mail message.

2. HFG Request for Eligibility Intake

Starting in PY24, HFG will be processing climate crisis eligibility intakes. These households will not receive a standard LIHEAP payment through HFG but will be directed to agency waitlist opening dates and times if they have not already received assistance in the current program year.

3. Space Heaters

HFG can give a space heater to households accessing the climate crisis program if they do not have emergency back-up heat. If the household is receiving a space heater through LIHEAP funds, a health and safety application and payment will need to be processed.

Households can keep the space heaters even after their heat system has been repaired or replaced and will need to sign the space heater agreement form.

(See *Section VII.* for more on Heat Crisis payments.)

V. Agency Procedures & Best Practices

A. Agency Requirements

1. Required Postings

There are two postings that each intake site must have posted in clear sight of utility assistance applicants.

The required postings must be visible in each utility assistance appointment location. These are:

- Right to a Fair Hearing
- OPUS Privacy Posting

If you don't have a copy of one or both of these posters, Lane County can provide them.

2. Outreach, Accessibility and Diversity

Lane County strives to reach underserved populations. LIHEAP promotional materials should be printed in English and Spanish. All energy assistance agencies are required to have access to translation services and resources.

B. Confidentiality & Fraud

1. Confidentiality

Confidentiality of client information is essential and must be assured by the agency. The Master Grant Agreement (MGA) between each agency and Oregon Housing and Community Services (OHCS) specifically addresses this responsibility. Please reference the current MGA for specific language.

For the protection of applicants and recipients, you must not disclose or use the contents of records, files, papers, or communications for purposes other than those directly connected with the administration of energy programs, whether on or off duty.

All staff and volunteers with access to utility assistance applicant names and/or information are required annually to read and sign:

- Confidentiality Statement
- OPUS User Policy, Responsibility & Code of Ethics

Intake agencies are required to train staff to maintain responsible work-site practices that protect applicants' confidential information. This includes but is not limited to:

- Storing applicant materials in locking file cabinets behind a locking door each evening

- Not leaving applicant materials exposed on their desk in the presence of non-agency staff, or when they are away from their desk
- Not photocopying or attaching copies of Social Security cards to utility assistance applications
- Redacting Social Security numbers, ID numbers and bank account numbers printed on all documentation attached to a utility assistance application
- Not emailing Social Security numbers!!

2. Fraud and Identity Theft

Fraud and Determination of Fraud

Fraud can involve applicants, employees, or vendors. In all cases of actual or suspected fraud the sub-grantee shall take necessary action to recover the funds and must inform OHCS. Fraud occurs when a household or business takes any of the following actions knowingly, willfully, and with deceitful intent by:

- Making false statements, or knowingly assisting applicants to make a false statement(s) to the agency or its agent(s), either orally or in writing, to receive benefits, services, or payments, for which the household/business are not eligible
- Concealing information that would change or disallow benefits for the household
- Violating provisions set forth in the program regulations, vendor contracts, or other documents pertaining to LIHEAP or OEAP

Complete and Accurate information

Before starting the appointment, advise the applicant of the importance of providing complete and accurate information. The information they provide may be audited by the State or Federal government, and failure to disclose complete and accurate information could lead to being found guilty of perjury.

If you suspect fraud or identify theft, contact the HSD Utility Services Supervisor.

Identity Theft

Oregon Housing and Community Services (OHCS) is committed to mitigating identity theft amongst low-income Oregonians who receive LIHEAP/OEAP funding. In addition to protecting the privacy and confidentiality of applicants, agencies should also be making efforts to ensure that day-to-day program practices guard against identity theft.

Some households may self-report establishing accounts in other household members' names to avoid large arrearages or maintain utility service. In these situations, agencies are advised to work with the applicant, utility and OHCS to re-establish an account in the proper name including arranging for additional energy assistance and/or alternative payment options if necessary.

Recovery of Ineligible Assistance

HSD is responsible for recovering duplicate payments, overpayments, and forgeries. HSD should first determine if the ineligible assistance is due to agency error or to applicant error. *If assistance has been provided due to agency error, the agency is responsible for repayment and/or recovery of ineligible benefits.*

If ineligible benefits are due to applicant error or fraud, HSD should follow the recovery procedure as outlined below:

1. Notify the vendor with information about the problem, and request return of the funds. If entire amount is returned from the vendor, the case is closed.
2. If funds have already been applied to the applicant's account by the vendor, the applicant is responsible for repaying the full benefit amount to the local agency. Send a certified letter to the applicant requesting reimbursement and providing a specific date for response. If fraud is suspected, include the fact that no response to the letter will result in the case being turned over to appropriate authorities for fraud investigation.
3. Send a copy to OHCS and keep all related documents in applicant file. The application's Authorization Number must appear on all correspondence.
4. If there is no response within thirty days from initial applicant contact, send a second letter to the applicant by certified mail, return receipt requested, with a copy to OHCS. This letter shall state that the matter is being turned over to OHCS, as of a specific date (use seven days from date certified letter was received), for fraud investigation.

All cases of actual or potential fraud must be reported to the state Energy Assistance Coordinator at OHCS. Additionally, all attempts to recover energy assistance funds by an agency must be reported *in writing* to OHCS. Should the applicant not complete their obligation to repay all ineligible funds received, notify OHCS.

Duplicate Social Security Numbers in OPUS

If you encounter a duplicate Social Security Number in OPUS, contact the HSD Program Services Coordinator immediately.

C. Allocation Tracking

Agencies should use the following reports and tools to track spending of energy assistance allocations:

- OPUS APC Allocation Summary Report
- OPUS Authorization Number Report
- Excel Authorization Number Log provided by HSD

Agencies can track their allocations by running the APC Allocation Summary Report. If discrepancies exist between the APC Allocation Summary report and an agency's own accounting of its allocation, the Authorization Number Report in OPUS Reports can help pinpoint the differences.

- Save the Authorization Number Report in OPUS as an Excel document
- Replace payment amount of Void and Denied Payments with \$0
- Add total at the bottom
- If total amount on the Authorization Number Report from OPUS differs from the agency's Authorization Number Log total, compare payments on Authorization Number report against agency log to find payment amount differences.

D. Waitlists

When a utility assistance program opens to the public, clients have several options to get on an energy assistance waitlist. These are:

- Go online to Lane County's website
 - For all energy programs : www.lanecountyor.gov/liheap
- Call a utility assistance agency
- Walk-in to a utility assistance agency
- Note: Households with a senior or disabled person that receive a Mailout application do not need to get on a waitlist!

1. Waitlist Management

- Waitlists are maintained on a first come, first served basis
- Agencies may transfer an applicant from one agency's waitlist to another agency's list. The date of the original contact with the first agency should be preserved in transfer process
- Do not delete any names from the list. It is fine to move names to another section within document
- Large agencies are required to keep the list in an Excel format – sortable and legible
- Save waitlists through the last day of the program year (Sept. 30)
- Households only need to place their name on one waitlist and then should be given all programs that they qualify for at the time of intake

Opening and Closing the Waitlist

- Agencies are required to open their LIHEAP waitlist on the first working day of November and subsequent months as funding permits.
- Agencies may close their phone/walk-in waitlist at their discretion. Agencies must notify the HSD Utility Services Supervisor and Program Services Coordinator prior to closing their list.

Adding Clients

- Add names in date and time order
- Record date, name, utility, all phone numbers and msg phone, name or initials of staff who put name on list

Merging Waitlists

When multiple waitlists exist for one program, they must be merged before clients can be contacted. This is to ensure equitable access to an intake appointment and program funding no matter the method a client uses to reach out to an agency.

Walk-in, phone, and online lists should all be merged into one and sorted based on the time stamp that the client was added to the waitlist.

2. Contacting Clients

Avoiding Duplicate Applications

Agencies must look an applicant household up in OPUS prior to contacting a client to ensure the applicant household has not already received the program in the same program year.

If a client has already received a payment for the program, they can be skipped but a comment must be made on the waitlist as to why the client was skipped.

Contacting Clients

- Make at least two attempts to call/contact households on the waitlist
- Track and record all attempts to contact households on the waitlist and the outcome of each call attempt (i.e., left voicemail)
- When a client is contacted the agency must do a Preliminary Household Assessment

3. Preliminary Household Assessment

The purpose of a pre-assessment is to gather the necessary information to assure the intake process is effective, efficient, and poses minimal burden to low-income applicants.

Below is a list of a few sample questions:

- Where does the client live? (Must be in Lane County.)
- What type of heating does the client have?
- How many people reside in the household? How many adults? How many children?
- What is the source and amount of gross income for the household? (Except income earned by minors.)
- Is the household in a crisis situation? (See *Section IV.*)

If a household is pre-screened as income eligible, proceed to *Schedule an Appointment*.

If a household is pre-screened as over-income, typically an appointment is not scheduled, and clients are informed that if their income drops they should get on the waitlist again. However, agencies cannot refuse to schedule an intake appointment for a household that appears over-income; final determination of eligibility happens at the appointment upon review of income documents.

Schedule an Appointment

Agencies can offer appointments in person, over the phone, online or through the mail. Emphasize appointment date, time, and location.

Explain that they will need to submit the following:

- Income verification for **all** household members except for income earned by minors.
- Identification for all adult members. (See *Section VI.C.3.* for examples of Identification Verification.)
- Utility/Vendor bill(s), statement, invoice, or receipt (must be in the name of applicant or adult HH member). All households are required to bring all their heating and electricity bills; account information for each heat source must be updated in OPUS.
- To receive a LIHEAP benefit, clients are required to provide a Social Security number (for those that have one) and birthdates for everyone in the household. For OEAP, OLGA and GAP Social Security numbers are strongly encouraged.

- Landlord/Renter Documentation (where applicable).

The following forms may need to be sent to the applicant prior to appointment:

- Landlord/Renter Verification Forms
- Declaration of Household Income Form (DHI)
- Self-Employment Form
- Proof of Residence form
- Permanent Disability Verification Form
- Health Jeopardy Verification – send to client’s medical provider directly

If possible, ask the client for an email address and email them the following:

- The appointment date, time, and location
- A list of what documents are required
- Include the Cognito link to any forms the client will need to complete and submit

If the applicant has submitted all required documents and signatures via online application or Mailout application (either sr/dis Mailout or general public option), agencies do not have to schedule an appointment and can process a payment as they work through the list.

E. Application Transport

Intake agencies mail or deliver energy assistance applications to Lane County.

Completed utility assistance applications must be submitted to the HSD within 10 days (agencies without an internal auditor) or 15 days (agencies with an internal auditor) of application completion, depending on if there is an internal auditor at the agency. Applications are required to be submitted at least weekly.

Each intake agency must track utility application submissions to the HSD. This includes:

- Maintain a log of each delivery, including date of delivery, the applications delivered and the person making the delivery. This must be done/recorded prior to delivery.
- One copy of each Vendor Pledge Sheet from all deliveries.

Intake agencies retain application delivery information for the duration of the program year (Sept. 30).

1. Delivering Utility Assistance Materials

Agencies are required to transport applications from their site to the HSD in secure, locking briefcase or other locking container. Only staff of a utility assistance agency can transport utility assistance applications.

If the HSD discovers applications are not in a bundle as indicated by the Vendor Pledge Sheet, then HSD staff notifies the agency via email with an attached, scanned copy of the Vendor Pledge Sheet. HSD makes a note in the Log that the application was not delivered which will remain until the application is received and logged.

2. Mailing Utility Assistance Materials

Agency staff members must carry materials to the post office in a secure, locked briefcase or satchel. If an agency discovers a confidentiality breach of applicant information, notify the HSD Utility Services Supervisor immediately. The HSD will take appropriate action.

F. Program Record Retention

Agencies are not required to make or keep copies of utility assistance applications or back up documentation.

Agencies are required to retain their waitlist, logs, application delivery records and space heater logs for the full program year, which ends September 30.

VI. Application Process

A. OPUS Data Entry

- Do not use punctuation in names. For example, if someone's name is spelled O'HARA, enter it into OPUS as OHARA
- Do not use hyphens. If someone's last name is Martinez-Smith, enter it as Martinez Smith
- Do not enter telephone numbers into OPUS for household members under the age of 18 or the same phone number for all household members

B. Eligibility

1. Regular Eligibility

LIHEAP requirements are as follows. See the program section for other programs' requirements.

- At least one Social Security number in the household
- The account holder must live in the household or landlord letter/rental agreement is required
- The household must meet the income guidelines for the household size (See "*Income Guidelines*" Handout)

LIHEAP does not discriminate against applicants for non-traditional housing. Applicants who live in alternative housing (i.e., a tent or a trailer) can still receive a LIHEAP payment for bulk fuel. The applicant's residence should be documented in OPUS using landmarks and cross-streets to best describe the location if there is not a traditional address. A Proof of Residence Form must be completed by the applicant and intake staff, then attached to the application.

2. Unusual Eligibility Situations

This section provides some basic guidance regarding eligibility determination in unusual situations. This information is not intended to be comprehensive, and discretion should be used in circumstances that do not fall neatly into the categories listed below.

Dwellings with a Shared Meter – LIHEAP Only

Many applicants reside in a dwelling that utilizes a single or master meter. These may include, but are not limited to:

- **Roomer/Boarder:** A roomer/boarder is a person who rents a room from the building owner. A roomer/boarder does not have a separate site address from other occupants of the building – however, a roomer/boarder does not share in providing, or being provided for, the necessities of life (e.g., food, living costs) with other residents of the structure. A roomer in a single-family structure must verify he or she is not part of the economic unit of the other tenants of the structure (e.g., rental agreement).

Call the HSD Program Services Coordinator with all Roomer/Boarder payments.

- **Neighbors/Land Sharing:** Applicants who obtain their primary heat or cooling from an extension cord to a neighboring residence are not eligible to receive LIHEAP for their electricity costs. However, they may apply as part of the neighboring household. If the household utilizes an alternate source of energy as their heating source (e.g., propane) they may be eligible for a LIHEAP benefit.
- **Hotels/Motels:** Applicants may be eligible for LIHEAP if they've resided in a hotel/motel for 30+ days **OR** if they are paying a "rental" (long-term) rate. Applicant is responsible for verifying length of stay and/or special rate.
- **Group Homes:** The Income of all residents must be considered in determining eligibility. "Group Home" examples may include Adult Foster Care, Oxford Houses or Homes for Adults with Developmental Disabilities. Group homes administered under a contract with, or administered by a government unit are considered an "institution" and are not eligible to receive LIHEAP services (e.g., most nursing home facilities).
- **Institutions:** Applicants living in institutions are not eligible to apply for energy assistance. Institutions include, but are not limited to: correctional facilities, nursing homes, alcohol/drug rehabilitation centers, treatment programs, dormitories, fraternities, sororities, domestic violence shelters and homeless shelters.
- **Commercial Utility Account:** Applicants with a commercial utility account are *not* eligible to receive energy assistance.

Companion/Attendant/Caregiver (C/A)

Some applicants may have someone living with them who provides health/supportive services. If the caregiver lives with the applicant and that is their only residence, they will be counted as part of the household and their income will be included. If the caregiver provides documentation that they have their own residence, they will not be included as part of the household and income will not be included. If the live-in caregiver is paid solely by the applicant and no other money is paid from outside of the household the income of the caregiver will not be counted as income. If the live-in caregiver is paid from a source outside of the residence that amount shall be counted as income.

Household Separation

If a previously served household separates, none of the adults may receive another standard payment during the current program year. Each new household may still be eligible for a crisis payment.

Counting Children in more than one household

Children can be counted in more than one household based on local agency decision and policy. Both households may qualify for a standard payment.

- If a child under 18 resides in two households, for example part-time with Mom and part-time with Dad, it is okay for the child to be included in both households.
- In this case if the first parent's application is pending, call the HSD during the intake. Staff will authorize the previous payment so you can then move the child into the household without disrupting the Pending payment. Use a paper application for the second if the first application cannot be authorized during the second intake. It is a violation of confidentiality to reveal to members of

either household that the other has applied for utility assistance.

- If there is unearned income associated with the child (child support, SS benefits, etc.) attach the income to the adult who receives the income and is responsible for the income. Do not attach the income to the child.

Tribal Members

The following Tribes receive LIHEAP funds directly from HHS:

- Confederated Tribes of Coos, Lower Umpqua, and Siuslaw Indians * 541-888-7522
- Confederated Tribes of Grand Ronde * 503-879-2250
- Confederated Tribes of Siletz Indians * 541-444-8311
- Confederated Tribes of Warm Springs
- Cow Creek Band of Umpqua Tribe of Indians
- The Klamath Tribe

* These Tribes reside in Lane County.

For those agencies with the above Tribes in their service territory: If a member from one of the above listed Tribes attends an intake appointment at an agency, their local Tribal office must be contacted to inquire about LIHEAP assistance already received for the current program year. If the household has received LIHEAP assistance from their Tribe, they would only be eligible to receive a LIHEAP Crisis payment (assuming they meet the crisis criteria for each agency). HSD will work with the OPUS HelpDesk to edit payments as necessary to reflect crisis assistance after initial Tribal assistance has been received. The client should be encouraged to access their Tribal LIHEAP program the following year.

Households affiliated with Oregon Tribes **not listed above** should be treated as any other applicant. Tribal LIHEAP funding should not affect eligibility criteria for the Oregon Energy Assistance Program (OEAP) or other leveraged funding sources.

Intakes

See paper application and instructions on completion in the complete LIHEAP Operations Manual.

Intakes may be scheduled beginning the first working day of the month in October (OEAP, OLGA) or November (LIHEAP). HSD will give final date as to when intakes can start. For Program Year 24, the last day for scheduled intakes is **no later than September 13, 2024**. This is to allow for agency processing, delivery to HSD, application authorization and payment before the end of the Program Year.

3. Determining Household Members

Departed Household Member

If a household member was residing in the household during the prior month or 30 days but is not in the household at the time of intake, that person should not be counted as a household member on the application because they will not benefit from the payment.

Part-time Household Members

It is up to the applicant to indicate who is a household member. If an adult resides part-time in two households, we need to know which household is their primary residence (in which household they spend the most time,

receive their mail, etc.) This is the household in which they will be counted. If they are a student and come home on the weekends, then they are a visitor and not a household member. The exception to this is children under 18 who can be considered to reside in two households (typically both parents) and can be counted/included in both households. (See *Section VI.B.2. "Unusual Eligibility Situations"* above.)

New Household Members

If a household applying for energy assistance has a new/current household member who wasn't in the household during the prior month (the month upon which eligibility is based) but is in the household at the time of application, the new household member and their income should be counted on the application. They will benefit from the payment.

4. SSN versus SYSID

Social Security numbers (SSN) are required for LIHEAP. Social Security numbers are encouraged but not required in the following programs: OLGA, GAP and OEAP.

It is recommended that the intake worker sees a Social Security number on a document before entering it into OPUS. However, it can be entered into OPUS based on a verbal sharing of the number. Note: A valid SSN will not begin with 000, 666, or 900-999.

Do not photocopy the Social Security card.

In those cases where circumstances prevent applicants from providing a Social Security number, OPUS will issue a unique client identification number to prevent duplication of services.

Social Security Number Code: (See SSN code on reverse side of the paper application.) In some cases, it may be allowable for a household member to not have an SSN and still be counted as a household member.

When an OPUS system ID number is used for a LIHEAP payment and the client meets the exception criteria, it must be noted in the Client Comment box which exception criteria have been met. Examples of exceptions for not providing a Social Security number include:

- Unavailable to custodial guardian/parent
- Children under the age of one
- Adult applying for SSN with letter of SSN application
- Domestic Violence (DV) (any information regarding DV should only be documented in/on the paper file, not in OPUS; in OPUS state "See File for SSN exception")

Exception criteria should be checked at each intake to be sure it is still valid. OPUS may clear exceptions at the beginning of the program year.

5. Verification of Identification

At a minimum, all adult household members must provide proof of identity once per program year. Adult ID verification will be cleared by OPUS at the beginning of the program year. No additional ID is required if the household member's name is on the utility bill or an income statement. Documentation of Adult ID must be attached to the application.

Below are examples of documentation that can be provided to establish identity:

DRIVER'S LICENSE	MILITARY IDENTIFICATION
BIRTH CERTIFICATE	INSURANCE CARD
INSURANCE RECORDS	COURT DOCUMENTS
GOVERNMENT RECORDS	TAX RECORDS
PASSPORT	STATE/GOVERNMENT ISSUED IDENTIFICATION
SCHOOL RECORDS/ID	DHS PRINTOUT
UTILITY BILLS	PAY STUBS
SOCIAL SECURITY RECORDS	OTHER IDENTIFYING PAPERWORK

6. Demographic Data

ALL DEMOGRAPHIC DATA, INCLUDING EDUCATION, MUST BE REQUESTED FOR EACH HOUSEHOLD MEMBER AT EACH INTAKE, especially if the response in OPUS is "Don't know". However, services will not be denied for refusal to provide demographic information.

7. Physical Address:

Document the household's physical address. *(Please note if different from the mailing address.)* The physical address on the application must match the service address on the utility bill/vendor receipt. If physical address is not on standardized utility bill, vendor receipt or landlord letter, alternate documentation of physical address must be provided. If no other document provided is printed with the physical address (for example when a P.O. Box is used instead), then agencies can use a Vendor Verification Form or contact HSD for ONE System verification of the address if the client receives food stamps. If the applicant is non-traditionally housed fill out a Proof of Residence form for them to sign.

8. Intake Dates

The intake date in OPUS and on the application, for an in-person utility assistance intake appointment, online or emailed application or a Mailout application, is the date a payment is created in OPUS.

9. Recertification or Express Eligibility

All programs can recertify based off LIHEAP if the household composition and address are the same as they were for LIHEAP and the LIHEAP intake was done in the current program year.

When recertifying off a LIHEAP, write the authorization number of the original application in the upper left corner of the new application and enter it in the Payment Comment field. (Comment: 12-01-22 Recertified off of D23456. BNA)

OEAP can use Express Eligibility from LIHEAP or the other programs listed in Section I.B.2 in lieu of income qualification. A LIHEAP receipt or other documentation of enrollment for the current or the previous year must be attached to the application. It is required to use Express Eligibility as often as possible.

If doing more than one payment at a time, do not recertify or express the additional payments. Just make copies

of all documents and do standard intakes.

To recertify or express a payment, the household composition must be identical to the original payment. Verify that no other payments were done in between the current intake and the intake you are recertifying your payment off. If there was, make sure the income entered in OPUS matches the original payment.

10. Completed Files

File is defined as an original application with all supporting documentation for a single payment, from a single funding source including original signatures. A completed application must match OPUS and **must have** the following:

1. The file must contain one of the following with all required signatures and dates in addition to current year disclaimer:
 - Local Application
 - OPUS Authorization Form

See *Section F* below for more information on Signatures.

2. Income documentation for all household members, excluding income earned by minors. This could include, but is not limited to:
 - Wage Slips
 - Written Employer Statement
 - Official State and/or Court documents
 - Benefit Verification Letters
 - Self-employment form
 - Bank Statements

If any adult member(s) of the household do not have income or have irregular income, this must be accounted for on a Declaration of Household Income form (DHI).

3. Supporting Documentation for Direct Payments (LIHEAP Only)-- includes, but is not limited to:
 - Receipts, Bills, or Invoices from Home Energy Supplier/Vendor
 - Landlord letter/lease/rental agreement for heating/cooling included in rent
 - Other documentation necessary to explain extreme/unusual circumstances
4. Copy of a current utility bill (billing date within 90 days of intake date) or most recent fuel vendor bill (no more than 12 months old). The service address on the bill must match the client's physical address. If standardized documentation is not available, documentation must be provided to show that a cash account has been established.

Contact with utilities/vendors must be documented and included in the client file. If contact is made by phone or through utility portal, the following information must be included on a *Vendor Verification Form*:

- Name(s) of utilities/vendors
- Person(s) contacted (if verifying via a log-in required utility portal, make note)
- Date(s) of contact

- Utility/vendor account number(s) (if this is a cash account, how is the account verified by the utility/vendor?)
 - Verification of name and address on account(s)
 - Account balance
 - Signature of agency representative completing form (clients may not fill out the Vendor Verification Form for themselves, it must be done by agency staff)
5. Justification for any benefit other than a regular payment as described in *Section III*. This includes:
- Direct Payment
 - Crisis/Combo – reason for crisis and amount of payment
 - Heating or Cooling Equipment Repair/Replacement
 - Roomer/Boarder Payment
 - Health & Safety
 - Fuel Payment
6. Copy of all correspondence/documentation such as:
- Notice of Action (NOA)
A NOA is required when an application is put on hold, changed or denied.
 - Declaration of Household Income Form (DHI) and/or other local agency form(s)
 - Self-Employment Form

Please Note:

- Any local forms with signature lines must be signed and dated
- Original signatures are required; “signature-on-file” is not acceptable
- If changes are made to the client record/payment in OPUS after the initial intake, the household must be “re-qualified” in the OPUS system for these changes to be reflected and changes must also be made on the application

9. Payment Receipts

Each applicant that is approved for an energy assistance payment must receive a Payment Receipt whether Mailout, OPUS generated application or digital application.

C. Vendor Information

Any vendor documentation used must have the following required fields listed on the document. This includes utility bills, utility portal print outs and the Vendor Verification Form. Vendor Verification Forms are intended to be used only for bulk fuels and pre-paid accounts.

Vendor updates are required for every heat source at every LIHEAP intake, even those sources not receiving an energy assistance payment. If missing, HSD will send a list to Agencies on an as needed basis. Agencies must acquire the required document and scan it to HSD to complete the file.

Account Number

Account number on the most recent vendor/utility bills provided. If a standardized account number is not utilized by utility/vendor, at a minimum, a client name must be listed in lieu of account number. *Leaving the account number box blank or putting “cash account” is not acceptable.*

Name on Account – LIHEAP only

The utility/vendor account holder must be the applicant or an adult member of the household. *Every effort should be made to place the applicant or an adult household member on the utility bill/account.* In cases where this is not feasible, justification must be well documented. Examples include:

- Domestic Violence (DV)/Safety Concerns (any information regarding DV should only be documented in/on the paper file, *not* in OPUS)
- Military Deployment of the Account Holder
- “Payee” or “Power of Attorney” Arrangement
- Incarcerated Account Holder

If the name on the account is not a household member and you are using one of the exceptions listed above, you must provide documentation of the exception when feasible and enter a detailed comment in the Payment Comments field. If the exception is due to domestic violence – do not enter domestic violence in OPUS. Instead, enter "See File" in the Payment Comments field and write the comment about the DV criteria on the printed application.

If the name on the account is not a household member, but the applicant is listed with the utility as a “liable party” with all responsibility and decision-making power of the account holder an email or other document from a utility staff member verifying this must be attached to the application.

If the account is in the name of someone who is a “Payee” or has a Power of Attorney (POA), the Payee form or the POA form must be attached to the application.

If a landlord’s name is on the account and the landlord will not allow the tenant to put the account in their own name, the applicant is entitled to a direct payment.

OEAP, OLGA and GAP do not allow direct payments or payments to landlord accounts. Applicant must be account holder.

Account Status

Circle the utility account status at the time of application. **For “Bulk Fuels” (Oil, Wood, Pellets, and Propane):** If an applicant has an inadequate supply of bulk fuel, the “Bulk Fuel” option should be selected. If they are out of fuel, the “Bulk Fuel Out” option should be selected. *This is entered on the Payment Screen.*

For pre-pay accounts, it is necessary to call the utility to verify all account information. Use the Vendor Verification Form.

Insufficient Vendor Documentation

If a bill or statement does not contain all required data elements, you must still collect them and record them. If a bill or statement is not within the timeframe needed or is incomplete, intake workers must acquire a valid, current copy of the utility bill from the Utility Company, which can be obtained via access to the Utility’s portal or by phone call to request an electronic copy.

For bulk fuel vendors, anything you collect via a phone call requires the Vendor Verification Form with

each field of the form completed. If there is no account number (i.e., gas station for propane), write the applicant's name on the account number line of the form.

D. Comments

Many payment types require a comment in the OPUS Payment View comment field. This section must be used to describe special circumstances. This includes, but is not limited to:

- Direct Payments
 - Reason for change, hold, denial or void
 - Justification for Crisis Payment or Combo payment
 - Justification for Crisis Benefit Amount (particularly when the benefit exceeds documented need or may result in a credit on a utility/vendor account)
- All comments must be dated and have the Intake Workers initials. If there are multiple comments from various dates, the comments should be in sequential order with the newest on the bottom. Multiple comments from the same date can be included together.

E. Signatures

PLEASE NOTE THE TEMPORARY COVID GUIDELINE REGARDING VERBAL SIGNATURES IN SECTION 1.F.2

Local applications and/or OPUS Authorization Forms must be signed and dated by the applicant, the intake worker, internal auditor, if applicable, and an authorizing HSD representative.

- An intake worker is generally defined as the person who gathers information, conducts the interview with the applicant via phone, mail, or in person and determines eligibility. The intake worker signs on the Intake Worker Signature line of the application.
- A data entry signature is required if there is an internal auditor at the agency who has reviewed the application. The agency auditor (if applicable) signs on the Data Entry Signature line of the application. If there is no internal auditor, an intake signature alone is sufficient.
- For monitoring and quality assurance purposes, all applications must be reviewed for accuracy and contain an authorizing signature prior to being authorized in OPUS. HSD staff signs on the Authorizing Agency Signature line of the application.

The applicant signs and dates the application after they have reviewed the information and have read the applicant disclaimer. The intake worker then signs and dates the application; a copy of the application must be provided to the client upon request.

If a non-household member is signing the application/OPUS Authorization Form, a Power of Attorney form with a justification must be included in the file. For those circumstances where obtaining a traditional original signature is either not possible or presents an unreasonable hardship for the client an emailed, faxed, or electronically transmitted document can be accepted. However, the document(s) must be printed and either stamped or marked as "Original."

In addition to the things listed above, all pages of the intake report/application must have matching dates and times.

F. Large Credit Balances

There is no limit to large credit balances on utility bills. This includes self-created credit balances and energy assistance. Agencies are expected to offer all programs available that a household is eligible for at the time of intake.

G. Making Corrections

Editing Payments versus Voiding Payments

If a payment in OPUS has data entry errors, DO NOT HOLD, DENY OR VOID THE PAYMENT. Simply edit the existing payment.

Correcting Information on a Printed Application

If there is a data entry error on a printed application:

- Correct the data in OPUS
- On the application, cross out the incorrect information with a single line and hand write the correct information using a green pen; the original information should still be visible.

NEVER remove a page from the original signed application and replace it with a newly printed page. This is considered fraud on the part of the agency and will result in serious consequences!

Changes that require a Notice of Action (NOA)

A copy of the NOA must be sent to the applicant, to the vendor(s) that have received a payment pledge, and to the HSD. The agency retains a copy for its records. The following are examples of changes to a payment already processed and pledged that require an NOA:

- Change to authorization number
- Change in payment amount
- Change in vendor
- Change in account number

** Applicant must be notified by phone and mail or email that their application is in HOLD status -

- Must include clear instructions on what is missing and deadline for submittal
- Agency must also call the client to inform them of the HOLD and deadline

A comment must be entered in the Payment View screen and on the application explaining that a NOA was sent and the reason for the NOA and the NOA deadline.

All NOAs and applications in Hold status must be kept in a special "HOLD" file at the agency.

H. Holds

1. Pending Applications

Applications that need additional eligibility verification may be placed in a pending file or placed on "Hold" in OPUS. Applicants should be informed that it is their responsibility to provide the additional information promptly.

Pending applications or applications on Hold must be held a minimum of fifteen (15) calendar days and a

“Notice of Action” (NOA) containing the following information must be provided to the applicant:

- Reason the application has been pended
- Information needed to complete the application
- Date by which the information is to be provided (15 calendar days from date sent)
- Result if information is not received by deadline. Applicants may be denied after the appropriate pending period as detailed above.

If a payment has been entered into OPUS, the intake worker immediately:

- Places the payment in HOLD status in OPUS to prevent pledging the payment to a vendor
- Enters a detailed comment in the Payment Comment field describing what is missing, the deadline and confirmation that a NOA was given to the applicant. These comments, like all OPUS comments, must be dated and have the worker’s initials. Comments are written on the application also.

For example: "11/7/22 Placed in Hold status because missing spouse's proof of employment income. Deadline is 11/22/22. Called applicant and mailed NOA. NOA attached. BNA"

Pending Application – Completed

If the Applicant provides the missing documentation by the deadline, then the Intake Worker completes the application process. If there was a payment entered into OPUS, the intake worker:

- Changes the payment status in OPUS from Hold to Pending
- Adds a comment in the Payment View screen explaining that the missing documentation was provided. Comments are written on application also.

For example, "11/20/22 Applicant provided spouse's proof of income. Payment no longer in Hold status. BNA".

The original comments in the Payment View comment field regarding the Hold status remain.

Pending Applications – Denied

If the Applicant does not provide the missing documentation by the deadline, the payment is Denied. If there was a payment entered into OPUS, the intake worker:

- Enters a new comment in the Payment View field that states why the payment is being denied. Comments are also written on application. For example, "11/23/22 Payment denied because Applicant did not provide missing proof of spouse's income within 15 day deadline. NOA sent. BNA"
- All original comments in the Payment View comment field regarding the Deny status remain.
- Submits the application with the NOA attached to the HSD.
- If there was a pledge to a utility, sends a copy of the NOA Denial to the utility company.
- Sends a copy of the NOA Denial to the applicant.

If there was no payment entered into OPUS, the agency submits an electronic copy of the original NOA to HSD via email to energy@lanecountyor.gov and informs the applicant.

If the applicant returns to the agency after the 15-day period has passed, their name can be added to the end of the waitlist if the waitlist is still open.

2. Denied Applications

An application is **denied** if the applicant fails to meet program eligibility requirements at the time of application.

Applicants must be provided a copy of the application, or a notice of action which outlines the reason for their denial.

All notices of denial (including pending notices) must include information regarding fair hearings. Any individual whose claim for LIHEAP or OEAP assistance is denied, or not processed with reasonable promptness, is entitled to ask for a fair hearing at the local agency level. The reason for denial must be documented.

All denied applications must be kept on file and have an intake and authorizing signature. Unless a client refuses, a client signature is required on all denied applications. If refused, please note "Refused" in place of the client signature.

Clients may contact Oregon Housing and Community Services (OHCS) within 30 days of the hearing decision to request that OHCS review the hearing decision for material deficiencies. The request for OHCS review must be in writing and delivered or mailed to OHCS at 725 Summer St NE Suite B, Salem OR 97301, or by email to energyservices@oregon.gov. Review by OHCS, and the manner thereof, is at the sole discretion of OHCS.

Application Denied at Intake

During an intake, an applicant may be determined to be ineligible. For example, the household may be over-income. Provide the applicant with a Notice of Action that explains why the payment was denied. If data entry has already begun, enter the income into OPUS. If you have created a payment in OPUS, you must print out the application and ask them to sign it. If they refuse to sign the application or depart prematurely, the intake worker must sign the form and write a note on the Applicant signature line explaining why there is no application signature.

The denied application must be submitted to HSD with all attached documentation (income, utility and NOA).

3. Voided Applications

Agencies NEVER void payments. Only HSD staff place payments in OPUS into VOID status.

An application is **voided** when it is found to be in error or when it is withdrawn by the applicant after it has been signed by an intake worker but not batched in OPUS. Applications already batched in OPUS can only be voided by OHCS.

Voided applications do not need to be printed but the reason for voiding an application must be documented in OPUS.

I. Staff as Applicant

Eligible agency staff may apply for energy assistance.

Agency staff, volunteers, friends, or family members of staff must call an energy assistance agency in order to be placed on an agency waitlist in first come/first served order just like all other applicants. No advantage will be given to staff, volunteers, friends, or family members of staff in regard to placement on any energy assistance waitlist.

1. Agency Staff with Access to Energy Information

Agency staff and volunteers who have access to the OPUS energy module, or an agency's LIHEAP waitlist, must seek LIHEAP or OEAP assistance **from a different agency**. When feasible, they should do so with other utility assistance programs (GAP, OLGA) also. The LIHEAP Senior agencies will provide LIHEAP appointments to the staff and volunteer applicants of other agencies, even if these households do not have a senior.

If a staff member or volunteer from one agency applies for utility assistance **at another agency**, they do not need to declare themselves as a utility assistance staff member or volunteer to the intake worker and the intake worker does not have to enter a comment in OPUS or write a note on the application.

If a staff member or volunteer with access to the OPUS Energy module or the agency's other utility assistance waitlists applies for a non-LIHEAP/ OEAP program (GAP, OLGA) **at the agency where they work** or volunteer, they must declare themselves as a utility assistance staff member or volunteer to the intake worker. The intake worker will write STAFF or VOLUNTEER in green ink the upper left-hand corner of the application. Employee applications must be approved and signed by the Executive Director or their designee. **A list of agency staff receiving utility assistance must be retained for auditing purposes and supplied to OHCS upon request.**

2. Agency Staff without Access to Energy Information

Agency staff or volunteers who do not have access to OPUS energy module and are not responsible for updating their agency's LIHEAP waitlist do not need to seek LIHEAP from a different agency and their applications do not need STAFF or VOLUNTEER noted in the upper left-hand corner of the application.

3. Family and Friends as Applicants

Eligible family members and friends may apply for energy assistance; however, a staff person other than a family member or friend should conduct the interview. In this case, no further action is required.

In agencies where it is otherwise not possible to meet this criteria, the staff person **must** record the relationship in the OPUS Payment Screen and on the application. The intake worker also must write FAMILY or FRIEND in the upper left-hand corner of the application in green ink. All applications of family and friends must be approved and signed by the agency Executive Director or their designee.

When friends or family members are assisted at the agency, a list of those served and the relationship must be retained for auditing purposes and supplied to OHCS upon request.

Please note that these are minimum requirements and that the definition of "friend" is not always clear.

4. CCS Staff and Volunteers as Applicants

Because CCS serves both the Eugene and Springfield communities, it is more difficult for CCS staff and volunteers to access energy assistance at non-CCS sites.

LIHEAP	CCS staff and volunteers can access LIHEAP at any non-CCS LIHEAP site
GAP	CCS staff and volunteers can access GAP at Campbell Center or Willamalane
OLGA	CCS staff and volunteers can access OLGA at Campbell Center
OEAP	CCS staff and volunteers can access OEAP at a CCS location. It should be the CCS location they do not work at as their primary work site. These applications will be audited and signed by the CCS Energy Program Coordinator.

J. Energy Education

Energy Education is required with each intake. This can include providing a client with handouts like Heat Sheets or Payment Tips.

Applicants on Budget Billing or Equal Payment plans should be advised to call their utility company because an energy assistance payment can de-stabilize budget billing.

K. Pledging and Bundling

Pledging Payments

Agencies should pledge utility assistance payments the day of intake or the following business day. The exception is for LIHEAP Mailout applications that are processed at the agency before funds for the program year have been received (see *Section I.A.4.*).

L. In-Agency Auditing

Agencies that process a large number of applications have an internal audit process. Internal auditors have completed the training and are authorized to review applications for accuracy. Once approved, auditors will sign the paper application on the Internal Auditor line before sending the applications to HSD.

M. Weatherization Referrals

If a household seems to be a good candidate for weatherization, intake staff should check the “weatherization referral” button on the payment screen. HFG can then run a report and contact households directly.

- The HFG Weatherization waitlist is always open
- Agencies should provide HFG’s Weatherization brochure
- Advise applicants to call HFG to get on the Weatherization waitlist: 541-682-2561
- Characteristics of a good weatherization referral are:
 - Age of house is pre-1990
 - Windows are silver, wood, brown metal
 - Storm windows
 - Wood or oil heated