

2025 NEADA LIHEAP DIRECTOR TRAINING

DAY ONE
March 9, 2025

Training Objectives

After this training, you will better understand:

- Initial steps for getting yourself situated as a new director.
- Your flexibility when interpreting federal statute/law.
- The basics of federal LIHEAP assurances.
- How different states and territories design their programs.
- Where to find and how to use additional resources

Training Outline—Day One

- **Getting Situated as a New LIHEAP Director**
- **How the LIHEAP Law impacts program design**
- **Assurance 1: Uses of Funds**
 - ✓ *Including 2604(c)—Crisis Funds*
 - ✓ *Grant Recipient Panel*
- **Assurance 2: Eligibility**
 - ✓ *Grant Recipient Panel*
- **Assurance 3: Outreach**

Includes networking lunch
and afternoon
regional round-table
discussions.

Training Outline—Day Two

- **Assurance 5: Benefits**
 - ✓ *Grant Recipient Panel*
- **Assurance 8: Equitable Treatment**
 - ✓ *Grant Recipient Panel*
- **Assurance Round-Up**
 - ✓ *Remaining Assurances*
- **Questions/Resources**

Includes working lunch and
afternoon OCS training.

GETTING SITUATED AS A NEW LIHEAP DIRECTOR

Getting Situated



Identify and reach out to your HHS Liaison

Email NEADA and use their listserv

Become oriented to key LIHEAP websites

Take advantage of online training materials

Find mentors in and out of your state/territory

Scour your state/local documentation

Federal Law

Federal statute and regulations set the outer boundaries for program design.

State/Territory Law

State/Territory statute, regulations, code, and rules may be “stricter” than federal rules.

Model Plan

Compliance Reviews, Audits

(Past Findings, Corrective Actions)

The Model Plan tells HHS how your state/territory LIHEAP program is designed.

Policy and Procedures Manuals

Subgrantee, Vendor Monitoring

(Tools, Past Findings, Corrective Actions)

Policies and procedure manual(s) spell out how the program will be run to align with Model Plan.

Subgrantee and Vendor Agreements

Agreements spell out how contracted entities deliver LIHEAP in alignment with Model Plan.

**Reports
(Federal, State, Internal)**

Reports tell how your state/territory used LIHEAP funds in accordance with Model Plan.

LIHEAP AS A BLOCK GRANT

LIHEAP As a Block Grant

While LIHEAP grant recipients must follow federal statute, the law gives them considerable flexibility in designing in designing and operating their programs.

LIHEAP Statute Section 2605(b):

“The Secretary [of Health and Human Services] may not prescribe the manner in which the state will comply with the provisions of this subsection.”

Block Grant Regulations

Block Grant Regulations at (45 CFR 96.50(e)):

- Grant recipients are largely responsible for interpreting statute
- Individual grant recipients may reach different interpretations of statute
- In resolving issues, HHS will defer to grant recipient interpretation unless it is “clearly erroneous.”

Block Grant Flexibility

The flexibility associated with LIHEAP means that recipients can (and should) design programs that best fit the needs and resources in their communities.

- Client need
- Other available energy assistance or weatherization resources
- Climate
- Fuel types/costs

To take full advantage of Block Grant flexibility, grant recipients must have a basic understanding of LIHEAP law. This includes both state/territory laws, as well as federal statute.

LIHEAP ASSURANCES

What are Assurances? Why are they Important?

Every September, states/tribes/territories who wish to receive LIHEAP funding must submit a model plan. The model plan (LIHEAP application) lays out how each grantee will use LIHEAP funds in accordance with the law.

“Each State desiring to receive an allotment for any fiscal year under this title shall submit an application to the Secretary. Each such application shall contain assurances by the chief executive officer of the State that the State will meet the conditions enumerated in section (b).”

Section 2605(a)(1) of the LIHEAP Act, 42 U.S.C. § 8624(a)(1)

What are Assurances? Why are they Important?

Section 1 Program Components

Program Components, 2605(a), 2605(b)(1) - Assurance 1, 2605(c)(1)(C)

1.1 Check which components you will operate under the LIHEAP program.

(Note: You must provide information for each component designated here as requested elsewhere in this plan.)

Dates of Operation

Start Date:

End Date:

- ☐ Heating assistance
- ☐ Cooling assistance
- ☐ Weatherization assistance
- ☐ Summer Crisis assistance
- ☐ Winter Crisis assistance
- ☐ Year-round crisis assistance

Provide further explanation for the dates of operation, if necessary

Administration for Children and Families

OMB Clearance No.: 09/0-00/5

Expiration Date: 02/28/2027

LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)

MODEL PLAN

Section 2 – Heating Assistance

Eligibility, 2605(b)(2) - Assurance 2

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

Add

Household Size

Eligibility Guideline

Eligibility Threshold

2.2 Do you have additional eligibility requirements for heating assistance?

☐

Yes

☐

No

2.3 Check the appropriate boxes below and describe the policies for each.

Analyzing the Assurances

Breaking It Down (Key-Takeaways)

- Identify key takeaways

Interpretation and Implementation

- Highlight examples of grantee interpretations

Bringing it Back Home

- Pinpoint questions grantees can use to self-assess their implementation

Assurance 1—Uses of Funds

Breaking It Down (Key-Takeaways)

Assurance 1: USES OF FUNDS

[Section 2605\(b\)\(1\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(1\)](#)

The funds grantees receive for LIHEAP must be used only for purposes explicitly authorized in the law. These include:

- heating and/or cooling assistance
- crisis assistance
- weatherization and energy-related home repair
- outreach to households with lowest income and highest home energy needs
- planning, development, and administration (including leveraging)

Assurance 1—Uses of Funds

Interpretation and Implementation

- Which program components will we administer?
- How will we allocate funding? (*% to each component*)
- WHEN will we use our funds? (*Winter versus year-round*)
- What will each program component include?

LIHEAP CRISIS

[Section 2605\(b\)\(1\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(1\)](#)

- A reasonable amount of award (based on data from prior years) shall be reserved until March 15 of each program year for energy crisis intervention.
- The program for which funds are reserved under this subsection shall
 - (1) Not later than 48 hours after a household applies for energy crisis benefits, provide some form of assistance that will resolve the energy crisis if such household is eligible to receive such benefits;
 - (2) Not later than 18 hours after a household applies for crisis benefits, provide some form of assistance that will resolve the energy crisis if such household is eligible to receive such benefits and is in a life-threatening situation;

Assurance 1—Uses of Funds

Bringing it
Back Home

How will we interpret and implement Assurance 1?
Example Focus Areas, Questions

Demand	<ul style="list-style-type: none">• Are we turning away households from one component (e.g., heating) in order to keep another (e.g. cooling)?
Need	<ul style="list-style-type: none">• Are we seeing an increase in households with high energy usage or inoperable equipment that may warrant more crisis or weatherization services?
Climate	<ul style="list-style-type: none">• Are more households requesting LIHEAP during months when the program hasn't typically been offered (e.g., summer)?
Resources	<ul style="list-style-type: none">• Do we have money left over at the end of each heating season that could fund cooling, summer crisis, or year-round crisis programs?

ASSURANCE ONE: USES OF FUNDS

1. WHICH LIHEAP COMPONENTS DO YOU CURRENTLY ADMINISTER? *For example:*

- Heating, Cooling, Weatherization, Crisis

2. WHAT DOES EACH PROGRAM COMPONENT INCLUDE? *For example:*

- Does your regular heating or cooling program include anything other than bill payment assistance?
- Does your crisis program include benefits other than bill payment assistance?
- Do you provide equipment repair/replacement? If yes, is this a part of your regular heating/cooling assistance, crisis, or weatherization component?

3. WHEN DO WE USE OUR FUNDS? *For example:*

- What are your program dates for heating, cooling, weatherization, etc.?
- How do you decide what these dates are each year?
- Is your crisis program offered for a limited period, seasonally, or year-round?

4. HOW DO YOU DECIDE/CHANGE HOW YOU USE LIHEAP EACH YEAR? *For example:*

- Are you legislatively mandated by your state or territory to provide weatherization, heating, or cooling programs?
- Does the amount of money you allocate to different components change each year? If yes, how do you make these decisions?
- Have you made any recent changes to the way you use LIHEAP funding? What changes and why?
- Are there changes you'd like to make in the way you use LIHEAP funding? Why? What are the barriers?

Assurance 1—Uses of Funds

Try using the **Performance Management Data Warehouse** to learn:

- What did we do last year with our money?
(Grantee Profile gives a one-year snapshot)
- What have we done over the years with our money?
(Standard Reports compares data across years)
- What have others done with their money?
(Standard/Custom Reports compare with other states)



Assurance 2—Eligibility

Breaking It Down (Key-Takeaways)

Assurance 2: ELIGIBILITY

[Section 2605\(b\)\(2\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(2\)](#)

Grantees will only make LIHEAP payments to:

1. Households with a member receiving one or more of the following:
 - a. assistance under the State program funded under part A of title IV of the Social Security Act*
 - b. supplemental security income payments under title XVI of the Social Security Act*
 - c. food stamps under the Food Stamp Act of 1977*
 - d. payments under section 415, 521, 541, or 542 of title 38, United States Code, or under section 306 of the Veterans' and Survivors' Pension Improvement Act of 1978*
2. Households with an income at or below the greater of 150 percent of the Federal Poverty Guidelines (FPG) or 60 percent of the state's median income (SMI).
 - *The eligibility limit cannot be set lower than 110% FPG.*
 - *Grantees can set additional eligibility criteria such as an assets test.*

Assurance 2—Eligibility

Interpretation and Implementation

How will we determine eligibility?

- Will we use categorical eligibility or not? Will our categorical eligibility requirements include special rules?


Who will be eligible?

- Income eligibility guidelines vary across grantees.
- There are some grantees who set different income eligibility guidelines for different components of their program.
 - One common example is Weatherization. Some states administer LIHEAP Weatherization funds using federal “DOE rules.” This means they can set the income eligibility threshold for weatherization services as high as 200% FPG.
- Crisis criteria must also be spelled out.

Assurance 2—Eligibility

Bringing it
Back Home

How will we interpret and implement Assurance 2?
Example Focus Areas, Questions

Eligible v. Assisted Households	<ul style="list-style-type: none">• Are we satisfied with the percentage of eligible households we are reaching?• What would be impact of moving the income eligibility threshold in my state?	 Try using the Performance Management Data Warehouse to see: <ul style="list-style-type: none">• What percentage of the income eligible population are we reaching?• How are income eligible households distributed (by income group) across my state?
Fewer HH or Higher Benefits?	<ul style="list-style-type: none">• Is it more important for our state, territory, or tribe to serve the highest number of households (even if the benefit amount is low?)• Is it more important for our state, territory, or tribe to provide households with a larger benefit (even if we serve fewer households?)	

ASSURANCE TWO: ELIGIBILITY

1. WHO IS ELIGIBLE FOR LIHEAP? *For example:*

- What is your maximum income threshold for LIHEAP? Is this different for different components (e.g., heating, cooling, weatherization)?
- Do you use categorical eligibility? If so, are there any specific guidelines or criteria you use? (e.g., do you require all household members to be categorically eligible, or just one household member?)

2. HOW DO YOU DETERMINE ELIGIBILITY? *For example:*

- Are there any unique processes, procedures you use to verify or determine eligibility (e.g., streamlined applications, extended certification periods, shared databases, etc)?

3. WHO IS ELIGIBLE FOR CRISIS SERVICES IN YOUR STATE/TERRITORY? *For example:*

- What criteria must a household meet to be eligible for LIHEAP crisis? How is this different for life-threatening crises (e.g. 18 vs 48-hour timelines)?
- How do you identify those households who meet crisis criteria?

4. HOW DO YOU DECIDE/CHANGE OUR ELIGIBILITY GUIDELINES? *For example:*

- Are you legislatively mandated by your state or territory to use specific eligibility guidelines?
- Have you made any recent changes to your eligibility guidelines? What changes and why?
- How are decisions made about these changes? What factors are considered?
- Are there any changes you'd like to make to your eligibility guidelines? Why? What are the barriers?

Assurance 3—Outreach

Breaking It Down (Key-Takeaways)

Assurance 3: OUTREACH

[Section 2605\(b\)\(3\) of LIHEAP Act, 42 U.S.C. § 8624\(b\)\(3\)](#)

Grantees must conduct outreach activities designed to assure that eligible households know about LIHEAP and other similar energy programs.

- Outreach should be especially targeted toward “vulnerable” households, e.g., elderly, young child and/or disabled individuals.
- Outreach should also be targeted to those households with high home energy burdens (the lowest income and highest energy costs).

Assurance 3—Outreach

Interpretation and Implementation

- **How are we making sure that eligible households know about LIHEAP?**
- **How are we targeting our outreach to vulnerable households?**


Traditional examples of LIHEAP Outreach:

- Billboards, bench, bus stop ads
- Fliers in senior/aging centers
- Fliers in food boxes or with Meals-on-Wheels deliveries
- Speeches by LIHEAP personnel at tribal meetings, church meetings, cultural center meetings, or other community meetings
- Social media (e.g., Facebook, Twitter)
- Fliers in social service offices
- Utility company bill inserts
- Mailings by the LIHEAP office, or as part of other social service program mailings
- LIHEAP “press kits” for community advocates who visit disabled or senior households who may be homebound.
- Fliers home with Head Start families

Assurance 3—Outreach

Bringing it
Back Home

How will we interpret and implement Assurance 3?
Example Focus Areas, Questions

Targeting	<ul style="list-style-type: none">• Do we know who is eligible for LIHEAP (e.g. demographics)?• Do we know where these eligible households are (e.g., geographically)?
Gaps	<ul style="list-style-type: none">• Who is applying for LIHEAP services?• How does this line up with who is eligible? 
Methods	<ul style="list-style-type: none">• Are we using the right tools to reach who we need to?• Are we actively conducting outreach throughout the year, or just at the beginning of the heating or cooling season?
Goals	<ul style="list-style-type: none">• Do we have clear outreach goals in our state, tribe, or territory?• If subgrantees deliver outreach, are they aware of these goals?