

LIHEAP Tribal Policy Manual

Division of Energy Assistance
Office of Community Services
Administration for Children & Families
U.S. Department of Health and Human Services



ADMINISTRATION FOR
CHILDREN & FAMILIES



Tribal Policy Manual

LIHEAP Tribal Manual and Policy Development

Understanding LIHEAP Funding & What's Expected

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Agency perspective on what is expected from the tribal grantee.



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Understanding LIHEAP Funding & What's Expected

Presenter: Josephine Rago-Adia, OCS Program Analyst

Tribal Responsibilities when running a LIHEAP Program

- Grantee will be fully responsible for carrying out the program in accordance to federal statute and block grant regulations, *including policy development*.



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Understanding LIHEAP Funding & What's Expected

- Tribal Policy Manual – As a Block Grant, the language of the LIHEAP Statute is limited, hence we rely on the grantees' interpretation and development of appropriate policies.

Framework of Policy Development

Legal Basis

- LIHEAP Statute
Omnibus Budget Reconciliation Act (OBRA) of 1981;16 Assurances
- Tribal Laws
- Annual LIHEAP Plan
- Grant Award – Terms and Conditions



Policy Statements



Standard Operating Procedures



Program Administration

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- **Benefits of creating a Tribal Policy Manual**
 - Guide for program and fiscal administration (*Increase the accountability of grantee's management and its staff*)
 - Legal document to support public inquiry (*Protecting staff from acting in a manner that might endanger the safety of themselves and others.*)
 - Reference for audit and monitoring purposes
 - Transitory document for new or future staff
 - Helping staff to make decisions more efficiently .
 - Providing instruction on how to do tasks
 - Creating confidence and reduce bias in decision-making
 - Protecting staff from acting in a manner that might endanger their employment.
 - Help staff to initiate actions and take responsibility without constant reference to management.



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Tribal Manual – Section D Policy Decisions

- **Choosing Eligibility Criteria**
- **How to treat HUD housing recipients**
- **How to treat alien households in LIHEAP**
- **Definition of Households**
- **Landlord Verification Form**
- **Defining Income**
- **Self-employment Income**
- **Excluded Income**
- **Deductions from Income**
- **Time Period for Measuring Income**
- **How to adjust Poverty Income Guidelines**
- **Setting Payment Levels**
- **Steps to Designing a Payment Matrix**
- **Choosing a Payment Method**
- **Vendor Payments and Agreements**
- **Payments to Wood Vendors**
- **Establishing a Crisis Intervention Program**
- **Establishing a Weatherization Program**
- **Requesting a Weatherization Waiver**
- **Contingency Funds**



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Resources:

- LIHEAP Statute and 16 Assurances <https://www.acf.hhs.gov/ocs/resource/liheap-statute-and-regulations>
- LIHEAP Grantee Resource Guide <https://liheapch.acf.hhs.gov/Tribes/manual.htm>
- LIHEAP Clearinghouse <https://liheapch.acf.hhs.gov/>



LIHEAP Tribal Policy Manual

Part I: LIHEAP Tribal Manual and Policy Development

Congratulations: You Have Funding! So What's Next?

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Tribal grantee perspective on how the tribal policies support the development of annual plans



LIHEAP Tribal Policy Manual

Part II: LIHEAP Tribal Manual and Policy Development

Congratulations: You Have Funding! So What's Next?

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LIHEAP Tribal Policy Manual

Part II: LIHEAP Tribal Manual and Policy Development

Facilitated Workshop on Policy Development

Policy Decisions | 4 Key Areas

- Choosing Eligibility Criteria



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Policy Decisions | 4 Key Areas

- Choosing Eligibility Criteria
- Vendor Payments and Agreements



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Policy Decisions | 4 Key Areas

- Choosing Eligibility Criteria
- Vendor Payments and Agreements
- Fraud Waste & Abuse



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Policy Decisions | 4 Key Areas | Group Exercise

- Choosing Eligibility Criteria
- Vendor Payments and Agreements
- Fraud Waste & Abuse
- Fair Hearing Process



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Choosing Eligibility Criteria

- Who is eligible?
- Do you give special consideration to applicants?
- Defining household income
- How do you treat households who live in subsidized housing?



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Vendor Payments and Agreements

- Determine a Payment Method
- Program Reconciliation
- Who do you include in a vendor agreement?



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Fraud Waste and Abuse

- What steps do you take to prevent and detect applicant fraud?
- What steps are taken to address applicant fraud?
- How will you determine the eligible benefit amount?
- How do you recognize and prevent program abuse?



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Fair Hearing Process

- What time frames will the tribe use?
- How will households be notified of their right to a fair hearing?
- What rights will the applicant have during the hearing?
- Who will conduct the hearing and make a final decision?



LIHEAP Tribal Policy Manual

Part III: LIHEAP Tribal Manual and Policy Development

Tribal Policy Manual, Annual Plans & How They Work Together

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*Agency perspective on how tribal policy manual and annual plans are used together.

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*Tribal grantee perspective on how the tribal policies support the development of annual plans



LIHEAP Tribal Policy Manual

Part III: LIHEAP Tribal Manual and Policy Development

Tribal Policy Manual, Annual Plans & How They Work Together

Group Exercise

Facilitated by Iris Curtis. OCS Auditor

- Discuss strategies for compliance with fiscal controls when developing the annual model plan. Laying out your process, drafting your policy and implementing your policy.
- Report back to the whole group to share effective strategies for achieving compliance for fiscal controls in the annual model plan.



LIHEAP Tribal Policy Manual

Tribal Roundtable on Natural Disasters & LIHEAP

Facilitated by Christine Celentano, Three Star Enterprises, LLC

Roundtable I:

Patrick Strickland, Program Manager
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Roundtable II:

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Roundtable III:

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LIHEAP Tribal Policy Manual

Tribal Roundtable on Natural Disasters & LIHEAP

Roundtable Leads will discuss their experience and facilitate a discussion of whether and how LIHEAP funding has been used during a natural disaster among participants.

The following questions will be discussed:

1. Consider your geographic region and potential weather related disasters you are prone to.
2. Do you have a plan of action?
3. Do you have policies to guide using LIHEAP funds in a natural disaster?