

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

**FISCAL YEAR 2015 MODEL PLAN
MICHIGAN DEPARTMENT OF HUMAN SERVICES**

Assurances

The Michigan Department of Human Services agrees to:

(1) use the funds available under this title to--

(A) conduct outreach activities and provide assistance to low income households in meeting their home energy costs, particularly those with the lowest incomes that pay a high proportion of household income for home energy, consistent with paragraph (5);

(B) intervene in energy crisis situations;

(C) provide low-cost residential weatherization and other cost-effective energy-related home repair; and

(D) plan, develop, and administer the State's program under this title including leveraging programs, and the State agrees not to use such funds for any purposes other than those specified in this title;

(2) make payments under this title only with respect to--

(A) households in which one or more individuals are receiving--

(i) assistance under the State program funded under part A of title IV of the Social Security Act;

(ii) supplemental security income payments under title XVI of the Social Security Act;

(iii) food stamps under the Food Stamp Act of 1977; or

(iv) 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; or

(B) households with incomes which do not exceed the greater of—

(i) an amount equal to 150 percent of the poverty level for such State; or

(ii) an amount equal to 60 percent of the State median income; except that a State may not exclude a household from eligibility in a fiscal year solely on the basis of household income if such income is less than 110 percent of the poverty level for such State, but the State may give priority to those households with the highest home energy costs or needs in relation to household income.

(3) conduct outreach activities designed to assure that eligible households, especially households with elderly individuals or disabled individuals, or both, and households with high home energy burdens, are made aware of the assistance available under this title, and any similar energy-related assistance available under subtitle B of title VI (relating to community services block grant program) or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;

(4) coordinate its activities under this title with similar and related programs administered by the Federal Government and such State, particularly low-income energy-related programs under subtitle B of title VI (relating to community services block grant program), under the supplemental security income program, under part A of title IV of the Social Security Act, under title XX of the Social Security Act, under the low-income weatherization assistance program under title IV of the Energy Conservation and Production Act, or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;

(5) provide, in a timely manner, that the highest level of assistance will be furnished to those households which have the lowest incomes and the highest energy costs or needs in relation to income, taking into account family size, except that the State may not differentiate in implementing this section between the households described in clauses 2(A) and 2(B) of this subsection;

(6) to the extent it is necessary to designate local administrative agencies in order to carry out the purposes of this title, to give special consideration, in the designation of such agencies, to any local public or private nonprofit agency which was receiving Federal funds under any low-income energy assistance program or weatherization program under the Economic Opportunity Act of 1964 or any other provision of law on the day before the date of the enactment of this Act, except that—

(A) the State shall, before giving such special consideration, determine that the agency involved meets program and fiscal requirements established by the State; and

(B) if there is no such agency because of any change in the assistance furnished to programs for economically disadvantaged persons, then the State shall give special consideration in the designation of local administrative agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds for the fiscal year preceding the fiscal year for which the determination is made;

(7) if the State chooses to pay home energy suppliers directly, establish procedures to --

(A) notify each participating household of the amount of assistance paid on its behalf;

(B) assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment made by the State under this title;

(C) assure that the home energy supplier will provide assurances that any agreement entered into with a home energy supplier under this paragraph will contain provisions to assure that no household receiving assistance under this title will be treated adversely because of such assistance under applicable provisions of State law or public regulatory requirements; and

(D) ensure that the provision of vendor payments remains at the option of the State in consultation with local grantees and may be contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households, including providing for agreements between suppliers and individuals eligible for benefits under this Act that seek to reduce home energy costs, minimize the risks of home energy crisis, and encourage regular payments by individuals receiving financial assistance for home energy costs;

(8) provide assurances that,

(A) the State will not exclude households described in clause (2)(B) of this subsection from receiving home energy assistance benefits under clause (2), and

(B) the State will treat owners and renters equitably under the program assisted under this title;

(9) provide that--

(A) the State may use for planning and administering the use of funds under this title an amount not to exceed 10 percent of the funds payable to such State under this title for a fiscal year; and

(B) the State will pay from non-Federal sources the remaining costs of planning and administering the program assisted under this title and will not use Federal funds for such remaining cost (except for the costs of the activities described in paragraph (16));

(10) provide that such fiscal control and fund accounting procedures will be established as may be necessary to assure the proper disbursement of and accounting for Federal funds paid to the State under this title, including procedures for monitoring the assistance provided under this title, and provide that the State will comply with the provisions of chapter 75 of title 31, United States Code (commonly known as the "Single Audit Act");

(11) permit and cooperate with Federal investigations undertaken in accordance with section 2608;

(12) provide for timely and meaningful public participation in the development of the plan described in subsection (c);

(13) provide an opportunity for a fair administrative hearing to individuals whose claims for assistance under the plan described in subsection (c) are denied or are not acted upon with reasonable promptness; and

(14) cooperate with the Secretary with respect to data collecting and reporting under section 2610.

(15) * beginning in fiscal year 1992, provide, in addition to such services as may be offered by State Departments of Public Welfare at the local level, outreach and intake functions for crisis situations and heating and cooling assistance that is administered by additional State and local governmental entities or community-based organizations (such as community action agencies, area agencies on aging and not-for-profit neighborhood-based organizations), and in States where such organizations do not administer functions as of September 30, 1991, preference in awarding grants or contracts for intake services shall be provided to those agencies that administer the low-income weatherization or energy crisis intervention programs.

*** This assurance is applicable only to States, and to territories whose annual regular LIHEAP allotments exceed \$200,000. Neither territories with annual allotments of \$200,000 or less nor Indian tribes/tribal organizations are subject to Assurance 15.**

(16) use up to 5 percent of such funds, at its option, to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance, including needs assessments, counseling, and assistance with energy vendors, and report to the Secretary concerning the impact of such activities on the number of households served, the level of direct benefits provided to those households, and the number of households that remain unserved.

Section 1

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

- | | | | |
|-------------------------------------|---------------------------|--------------------------|--------------------------|
| <input checked="" type="checkbox"/> | Heating assistance | Start date: Jan. 1, 2015 | End date: Sept. 30, 2015 |
| <input type="checkbox"/> | Cooling assistance | Start date: | End date: |
| <input checked="" type="checkbox"/> | Crisis assistance | Start date: Nov. 1, 2014 | End date: May 31, 2015 |
| <input checked="" type="checkbox"/> | Weatherization assistance | Start date: Oct. 1, 2014 | End date: Sept. 30, 2015 |

Estimated Funding Allocation, 2604(c), 2605(k)(1), 2605(b)(9), 2605(b)(16) – Assurances 9 and 16

1.2 Estimate what amount of available LIHEAP funds will be used for each component that you will operate: **The total of all percentages must add up to 100%.**

30 % heating assistance

 % cooling assistance

45 % crisis assistance

15 % weatherization assistance

 % carryover to the following Federal fiscal year

10 % administrative and planning costs

 % services to reduce home energy needs including needs assessment (Assurance 16)

 % used to develop and implement leveraging activities

100 % **TOTAL**

Alternate Use of Crisis Assistance Funds, 2605(c)(1)(C)

1.3 The funds reserved for winter crisis assistance that have not been expended by March 15 will be reprogrammed to:

- Heating assistance
- Weatherization assistance
- Cooling assistance
- Other (specify): Not Applicable

Categorical Eligibility, 2605(b)(2)(A) – Assurance 2, 2605(c)(1)(A), 2605(b)(8A) – Assurance 8

1.4 Do you consider households categorically eligible if one household member receives one of the following categories of benefits in the left column below? Yes No

	Heating	Cooling	Crisis	Weatherization
SNAP				
TANF				
SSI				
Means-tested veteran's program				
Other (Specify):				

1.5 Do you automatically enroll households without a direct annual application?

- Yes
- No -- If yes, explain:

1.6 How do you ensure there is no difference in the treatment of categorically eligible households from those not receiving other public assistance when determining eligibility and benefit amounts?

SNAP Nominal Payments

1.7 Do you allocate LIHEAP funds toward a nominal payment for SNAP clients?

- Yes
- No

Amount of Minimal Assistance: \$ _____

Frequency of Assistance:

- Once per year
- Once every five years
- Other (describe): _____

Determination of Eligibility – Countable Income

1.8 In determining a household's income eligibility for LIHEAP, do you use gross income or net income?

- Gross Income
- Net Income

Note: Net income is determined by deducting allowable expenses from the gross income.

1.9 Select all of the applicable forms of countable income used to determine a household's income eligibility for LIHEAP.

- Wages
- Self-employment income
- Contract income
- Payments from mortgage or sales contracts
- Unemployment Insurance
- Strike pay
- Social Security Administration (SSA) benefits
 - Including Medicare deduction
 - Excluding Medicare deduction
- Supplemental Security Income (SSI)
- Retirement / pension benefits
- General Assistance benefits
- Temporary Assistance for Needy Families (TANF) benefits
- Supplemental Nutrition Assistance Program (SNAP) benefits
- Women, Infants, and Children Supplemental Nutrition Program (WIC) benefits
- Loans that need to be repaid
- Cash gifts
- Savings account balance
- One-time lump-sum payments, such as rebates/credits, winnings from lotteries, refund deposits, etc.
- Jury duty compensation
- Rental income
- Income from employment through Workforce Investment Act (WIA)
- Income from work study programs
- Alimony
- Child support
- Interest, dividends, or royalties
- Commissions
- Legal settlements
- Insurance payments made directly to the insured
- Insurance payments made specifically for the repayment of a bill, debt, or estimate
- Veterans Administration (VA) benefits
- Earned income of a child under the age of 18
- Balance of retirement, pension, or annuity accounts where funds cannot be withdrawn without a penalty.
- Income tax refunds
- Stipends from senior companion programs, such as VISTA
- Funds received by household for the care of a foster child
- Ameri-Corp Program payments for living allowances, earnings, and in-kind aid.
- Reimbursements (for mileage, gas, lodging, meals, etc.)
- Other – DHS policy manual item ERM 206 provides a list of countable and excluded income.

Section 2 - HEATING ASSISTANCE

Eligibility, 2605(b)(2) – Assurance 2

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

2014 HHS poverty income level 110 %

OR

FY 2015 state's median income _____ %

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.

- | | Yes | No |
|--|-------------------------------------|-------------------------------------|
| ● Do you require an assets test? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ● Do you have additional/differing eligibility policies for: | | |
| ● Renters? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Renters living in subsidized housing? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ● Renters with utilities included in the rent? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Do you give priority in eligibility to: | | |
| ● Elderly? | <input type="checkbox"/> | <input checked="" type="checkbox"/> |
| ● Disabled? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Young children? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Households with high energy burdens? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
| ● Other? | <input checked="" type="checkbox"/> | <input type="checkbox"/> |
- Note: special exemptions are allowed for deaf, disabled or blind, and qualified disabled veterans

Determination of Benefits, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

2.4 Describe how you prioritize the provision of heating assistance to vulnerable households, e.g., benefit amounts, application period, etc.

2.5 Check the variables you use to determine your benefit levels. (Check all that apply):

- Income
- Family (household) size
- Home energy cost or need:
 - Fuel type
 - Climate/region
 - Individual bill
 - Dwelling type
 - Energy burden (% of income spent on home energy)
 - Energy need
 - Other (Describe)

The standard credit computation uses standard allowances established by law.

The alternate credit uses heating costs to compute a home heating credit. The benefit amount is determined using actual heating costs for an established 12 month period, (November 1 through October 31).

Benefit Levels, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

2.6 Describe benefit levels:

\$_____ Minimum benefit

\$_____ Maximum benefit

Benefit amounts are computed using several factors, including household resources and exemptions, therefore there are no defined minimum or maximum benefit amounts established. The Home Heating Credit Application and Instruction Booklet can be found online by visiting the following link: http://michigan.gov/documents/taxes/2013_MI-1040CR7_Book_444620_7.pdf

2.7 Do you provide in-kind (e.g., blankets, space heaters) and/or other forms of benefits?

Yes No If yes, describe.

Section 3: COOLING ASSISTANCE

Eligibility, 2605(c)(1)(A), 2605(b)(2) – Assurance 2

3.1 Designate the income eligibility threshold used for the cooling component:

2014 HHS poverty income level _____%

OR

FY 2015 median income _____%

3.2 Do you have additional eligibility requirements for **COOLING ASSISTANCE**

Yes No

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

- | | <u>Yes</u> | <u>No</u> |
|--|--------------------------|--------------------------|
| ● Do you require an asset test? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Do you have additional/differing eligibility policies for: | | |
| ● Renters? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Renters living in subsidized housing? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Renters with utilities included in the rent? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Do you give priority in eligibility to: | | |
| ● Elderly? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Disabled? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Young children? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Households with high energy burdens? | <input type="checkbox"/> | <input type="checkbox"/> |
| ● Other? | <input type="checkbox"/> | <input type="checkbox"/> |

3.4 Describe how you prioritize the provision of cooling assistance to vulnerable households, e.g., benefit amounts, application period, etc.

Determination of Benefits, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

3.5 Check the variables you use to determine your benefit levels. (Check all that apply):

- Income
- Family (household) size
- Home energy cost or need
- Fuel type
- Climate/region
- Individual bill
- Dwelling type
- Energy burden (% of income spent on home energy)
- Energy need
- Other (describe)

Benefit Levels, 2605(b)(5) – Assurance 5, 2605(c)(1)(B)

3.6 Describe benefit levels:

\$_____ Minimum benefit \$_____ Maximum benefit

3.7 Do you provide in-kind (e.g. fans, air conditioners) and/or other forms of benefits?

Yes No If yes, describe.

Section 4: CRISIS ASSISTANCE

Eligibility - 2604(c), 2605(c)(1)(A)

4.1 Designate the income eligibility threshold used for the crisis component:

2014 HHS poverty income level 150 %

OR

FY 2015 state median income _____ %

4.2 Provide your LIHEAP program's definition for determining a crisis.

Eligibility for an energy-related crisis is based on the household's demonstration of immediate need for assistance with home heating fuel, electricity, or energy-related home repairs.

Immediate need may be demonstrated by:

- a declared need for a deliverable fuel such as fuel oil, LP gas, coal or wood;
- presentation of a notice that the balance in a prepayment account is below a minimum amount, presentation of a past due or shut-off notice for natural gas or electricity;
- notification received from a participating provider via a web service interface that a household's natural gas and/or electric account is in past due or shut-off status or below the minimum amount if a prepayment account;
- a verified need for a furnace repair or replacement of a non-functioning furnace. This is allowed only if the home is owned, being purchased or a group member holds a life estate on the home with the responsibility for home repairs and the home must be the group's permanent, usual residence.

Eligibility will be determined within 10 calendar days after the date of application. Eligibility staff will contact the energy provider to secure a hold on the shutoff to resolve any immediate crisis. This allows staff time to obtain verifications and make a proper determination of eligibility. For those providers participating with the web service interface in conjunction with the electronic applications, there may be a hold placed at the time the applicant submits the application in MI Bridges. If the provider does not grant a hold electronically, the worker is able to contact the energy provider and request a hold on the account. In the case of a deliverable fuel need, staff will determine eligibility and authorize a delivery, if eligible, on the date of application.

4.3 What constitutes a life-threatening crisis?

If a furnace repair/replacement is needed, staff will determine if the housing is safe. If not, payment is made for emergency shelter until repairs can be completed.

Crisis Requirements, 2604(c)

4.4 Within how many hours do you provide crisis assistance that will resolve the energy crisis for eligible households? 48 Hours

4.5 Within how many hours do you provide crisis assistance that will resolve the energy crisis for eligible households in life-threatening situations? 18 Hours

Crisis Eligibility, 2605(c)(1)(A)

4.6 Do you have additional eligibility requirements for **CRISIS ASSISTANCE**?

Yes No

A residential fuel tank must not contain more than 25% of its heating fuel capacity, a notice that the balance in a prepayment account is at or below \$100.

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

	<u>Yes</u>	<u>No</u>
● Do you require an assets test?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
● Do you give priority in eligibility to:		
● Elderly?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Disabled?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Young children?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Households with high energy burdens?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Other?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● In order to receive crisis assistance:		
● Must the household have received a shut-off notice or have a near empty tank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must the household have been shut off or have an empty tank?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must the household have exhausted their regular heating benefit?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must renters with heating costs included in their rent have received an eviction notice?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must heating/cooling be medically necessary?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Must the household have non-working heating or cooling equipment?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
● Other?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Do you have additional/differing eligibility policies for:		
● Renters?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Renters living in subsidized housing?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
● Renters with utilities included in the rent?	<input checked="" type="checkbox"/>	<input type="checkbox"/>

Determination of Benefits

4.8 How do you handle crisis situations?

- Separate component
- Fast Track
- Other

- 4.9 If you have a separate component, how do you determine crisis assistance benefits?
 Amount to resolve crisis, up to a maximum of \$450-\$850, depending on type of fuel.
 Other

Crisis Requirements, 2604(c)

- 4.10 Do you accept applications for energy crisis assistance at sites that are geographically accessible to all households in the area to be served?
 Yes No

- 4.11 Do you provide individuals who are physically disabled the means to:

■ Submit applications for crisis benefits without leaving their homes?

- Yes No If yes, explain.

SER applications can be mailed into the local DHS county offices or an application can be submitted electronically through the DHS MiBridges online application.

■ Travel to the sites at which applications for crisis assistance are accepted?

- Yes No If yes, explain.

SER applications can be submitted in-person at any local DHS county office.

Benefit Levels, 2605(c)(1)(B)

- 4.12 Indicate the maximum benefit for each type of crisis assistance offered.

Winter Crisis \$ 450-850 maximum benefit
 Summer Crisis \$ _____ maximum benefit
 Year-round Crisis \$ _____ maximum benefit

- 4.13 Do you provide in-kind (e.g. blankets, space heaters, fans) and/or other forms of benefits?
 Yes No If yes, describe.

- 4.14 Do you provide for equipment repair or replacement using crisis funds?
 Yes No

- 4.15 Check appropriate boxes below to indicate type(s) of assistance provided:

	Winter Crisis	Summer Crisis	Year-round Crisis
Heating system repair	X		
Heating system replacement	X		
Cooling system repair			
Cooling system replacement			
Wood stove purchase			
Pellet stove purchase			
Solar panel(s)			
Windmill(s)			
Utility poles / Gas line hook-ups			
Other (Specify):			

4.16 Do any of the utility vendors you work with enforce a winter moratorium on shut offs?

Yes No

4.17 Describe the terms of the moratorium and any special dispensation received by LIHEAP clients during or after the moratorium period.

Per Public Act 95 of 2013, "An electric utility, municipally owned electric utility, or cooperative electric utility may elect to not collect a low-income energy assistance funding factor under this section by annually filing a notice with the public service commission by July 1. Notwithstanding any other provision of this act, an electric utility, municipally owned electric utility, or cooperative electric utility that elects to not collect a low-income energy assistance funding factor under this section shall not shut off service to any residential customer from November 1 to April 15 for nonpayment of a delinquent account."

Section 5: WEATHERIZATION ASSISTANCE

Eligibility, 2605(c)(1)(A), 2605(b)(2) – Assurance 2

5.1 Designate the income eligibility threshold used for the weatherization component:

2014 HHS poverty income level 150 %

OR

FY 2015 state median income _____ %

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

5.3 Name the agency. DHS Bureau of Community Action and Economic Opportunity

5.4 Is there a separate monitoring protocol for weatherization? Yes No

WEATHERIZATION - Types of Rules

5.5 Under what rules do you administer LIHEAP weatherization? (Check only one.)

Entirely under LIHEAP (not DOE) rules

Entirely under DOE WAP (not LIHEAP) rules

Mostly under LIHEAP rules with the following DOE WAP rule(s) where LIHEAP and WAP rules differ: (Check all that apply.)

Income Threshold

Weatherization of entire multi-family housing structure is permitted if at least 66% of units (50% in 2- & 4-unit buildings) are eligible units or will become eligible within 180 days.

Weatherization of shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities) is permitted.

Other (describe)

Mostly under DOE WAP rules, with the following LIHEAP rule(s) where LIHEAP and WAP rules differ: (Check all that apply.)

Income Threshold (LIHEAP 150% FPL and WAP 200% FPL)

Weatherization not subject to DOE WAP maximum statewide average cost per dwelling unit.

Weatherization measures are not subject to DOE Savings to Investment Ratio (SIR) standards.

Other (describe)

Eligibility, 2605(b)(5) – Assurance 5

	<u>Yes</u>	<u>No</u>
5.6 Do you require an assets test?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.7 Do you have additional/differing eligibility policies for:		
• Renters?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
• Renters living in subsidized housing?	<input type="checkbox"/>	<input checked="" type="checkbox"/>
5.8 Do you give priority in eligibility to:		
• Elderly?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Disabled?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Young children?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Households with high energy burdens?	<input checked="" type="checkbox"/>	<input type="checkbox"/>
• Other?	<input type="checkbox"/>	<input type="checkbox"/>

Benefit Levels

5.9 Do you have a maximum LIHEAP weatherization benefit/expenditure per household?
 Yes No

5.10 What is the maximum amount? \$ 6987.00

Types of Assistance, 2605(c)(1), (B) & (D)

5.11 What LIHEAP weatherization measures do you provide? (Check all categories that apply.)

<input checked="" type="checkbox"/> Weatherization needs assessments/audits	<input checked="" type="checkbox"/> Major appliance repairs
<input checked="" type="checkbox"/> Caulking and insulation	<input checked="" type="checkbox"/> Major appliance replacement
<input checked="" type="checkbox"/> Install storm windows	<input checked="" type="checkbox"/> Install windows/sliding glass doors
<input checked="" type="checkbox"/> Heating system repairs	<input checked="" type="checkbox"/> Install doors (interior/exterior)
<input checked="" type="checkbox"/> Heating system replacement	<input checked="" type="checkbox"/> Install water heater
<input type="checkbox"/> Cooling system repairs	<input checked="" type="checkbox"/> Water conservation measures
<input type="checkbox"/> Cooling system replacement	<input checked="" type="checkbox"/> Compact florescent light bulbs
<input checked="" type="checkbox"/> Energy related roof repair	<input type="checkbox"/> Other (describe)

Section 6: Outreach, 2605(b)(3) – Assurance 3, 2605(c)(3)(A)

6.1 Select all outreach activities that you conduct that are designed to assure that eligible households are made aware of all LIHEAP assistance available:

- Place posters/flyers in local and county social service offices, offices of aging, Social Security offices, VA, etc.
- Publish articles in local newspapers or broadcast media announcements.
- Include inserts in energy vendor billings to inform individuals of the availability of all types of LIHEAP assistance.
- Mass mailing(s) to prior-year LIHEAP recipients.
- Inform low income applicants of the availability of all types of LIHEAP assistance at application intake for other low-income programs.
- Execute interagency agreements with other low-income program offices to perform outreach to target groups.
- Other (specify):
Michigan informs low-income applicants of the availability of LIHEAP via notices to clients, State web-sites, letters, posters, publications and weatherization referrals.

Section 7: Coordination, 2605(b)(4) – Assurance 4

7.1 Describe how you will ensure that the LIHEAP program is coordinated with other programs available to low-income households (TANF, SSI, WAP, etc.)

- Joint application for multiple programs
- Intake referrals to/from other programs
- One-stop intake centers
- Other – describe:

The LIHEAP crisis intervention component will be coordinated with Michigan's existing SER program and the Michigan Energy Assistance Program (MEAP). DHS administers MEAP in consultation with the Department of Licensing and Regulatory Affairs, Michigan Public Service Commission division. MEAP is funded through a residential funding factor and LIHEAP dollars. MEAP funds are awarded statewide through a Request for Proposal process to selected applicants. MEAP grantees develop their own crisis assistance component, in accordance with legislation described in Public Act 615 of 2012 and Public Act 95 of 2013. Michigan's energy-related emergency services to low income households will be provided through MEAP and the SER energy services component. The cost for energy services will be covered with LIHEAP and state funds.

LIHEAP weatherization will be coordinated with US Department of Energy Weatherization Assistance Program. Local weatherization operators coordinate the LIHEAP and DOE funds to meet weatherization needs at the local level.

Section 8: Agency Designation, 2605(b)(6) – Assurance 6

8.1 How would you categorize the primary responsibility of your State agency?

- Administration Agency
- Commerce Agency
- Community Services Agency
- Energy/Environment Agency
- Housing Agency
- Welfare Agency
- Other – describe:

Alternate Outreach and Intake, 2605(b)(15) – Assurance 15

8.2 How do you provide alternate outreach and intake for **HEATING ASSISTANCE**?

DHS and the Department of Treasury will coordinate outreach activities to inform all LIHEAP eligible households of the program, as well as inform such households of other major energy programs. Target groups are senior citizens, disabled residents, Native Americans, migrants and households with young children. To reach this goal Community Action Agencies, the Michigan Public Service Commission, the Office of Services to the Aging, the Commission on Indian Affairs and other advocate groups are informed of the LIHEAP program.

Examples of outreach efforts include posters, state website, media announcements and local agency outreach.

In addition, the Department of Treasury will mail a Home Heating Credit application to all households eligible for the program during the previous fiscal year, including households with high home energy burdens, low income senior citizens who filed a property tax claim during the previous fiscal year and to cash assistance recipients (primarily FIP households). Applications will also be mailed to recipients of the previous fiscal year Michigan property tax credits who appear to have been eligible but failed to apply for the Home Heating Credit.

8.3 How do you provide alternate outreach and intake for **COOLING ASSISTANCE**?

8.4 How do you provide alternate outreach and intake for **CRISIS ASSISTANCE**?

The LIHEAP crisis intervention component will be coordinated with MEAP. Crisis assistance is available statewide through Community Action Agencies, non-profit entities and directly with qualifying energy providers

	<u>Heating</u>	<u>Cooling</u>	<u>Crisis</u>	<u>Weatherization</u>
Who determines client eligibility?	Michigan Department of Treasury	Not applicable	Local DHS offices and MEAP grantees	Community Action Agencies
Who processes benefit payments to gas and electric vendors?	Michigan Department of Treasury	Not applicable	Local DHS offices and MEAP grantees	N/A
Who processes benefit payments to bulk fuel vendors?	Michigan Department of Treasury	Not applicable	Local DHS offices and MEAP grantees	N/A
Who performs installation of weatherization measures?	N/A	N/A	N/A	Community Action Agencies

8.5 What is your process for selecting local administering agencies? Request for Proposal Process.

8.6 How many local administering agencies do you use? There were 14 MEAP grantees in FY14.

8.7 Have you changed any local administering agencies from last year? N/A

8.8 Why?

- Agency was in noncompliance with grantee requirements for LIHEAP
- Agency is under criminal investigation
- Added agency
- Agency closed
- Other - describe

Section 9: Energy Suppliers, 2605(b)(7) – Assurance 7

9.1 Do you make payments directly to home energy suppliers?

Heating Yes No

Cooling Yes No

Crisis Yes No

Are there exceptions? Yes No

Home Heating Credit: Benefits will be issued as an energy draft or vendor payment if the household has a direct responsibility to an energy supplier for heating costs or as a warrant if heat is included in the rent.

9.2 How do you notify the client of the amount of assistance paid?

Clients are issued a statement notifying them of the amount of assistance paid if a payment is made to their energy supplier.

9.3 How do you assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment?

No DHS payment is released until the qualifying household has provided proof that they have made all required copays.

9.4 How do you assure that no household receiving assistance under this title will be treated adversely because of their receipt of LIHEAP assistance?

Energy providers are required to sign a participation agreement that assures non-discrimination against eligible households. Vendor payments for SER energy services and energy drafts may be accepted only by enrolled energy suppliers. Local offices have access to the provider file through online inquiry. Payments may only be authorized to enrolled suppliers. The Department of Treasury will not redeem energy drafts submitted by non-enrolled energy suppliers.

Home repair service providers must agree to non-discrimination provisions before payment will be made from the SER energy services component. All home repair service providers must be licensed by the State of Michigan Department of Energy, Labor and Economic Growth. The Authorization/Invoice utilized for the program must be signed by the provider to assure the provider's agreement with these provisions.

9.5 Do you make payments contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households? Yes No

Section 10: Program, Fiscal Monitoring, and Audit, 2605(b)(10) – Assurance 10

10.1 How do you ensure good fiscal accounting and tracking of LIHEAP funds?

Michigan will cooperate with the Secretary with respect to data collection.

DHS: Fiscal control and fund accounting procedures have been established to assure proper disbursement of and accounting for all federal funds received. As a state agency, DHS must follow rigorous fiscal accountability and control procedures as laid out in the Michigan Office of Technology, Management, and Budget’s Financial Management guide. The State of Michigan Financial Management Guide (FMG) represents a consolidation of state financial management policies and procedures. When completed, the FMG will provide “one-stop shopping” for policies and procedures that are currently found in a variety of manuals, letters and other types of documents. These include the Administrative Guide to State Government, Financial Reporting and Accounting Manual (FRAM), payroll letters and directives, and ADPICS/R*STARS Security Manual.

The FMG is available in electronic format only. The OFM does not provide paper copies of the FMG, but does notify users of the guide when updates to the guide are issued.

A full copy of these procedures can be found at http://www.michigan.gov/dmb/0,1607,7-150-9131_9347---,00.html. In addition to this guidance, DHS has many resources available to help manage grants including the Federal Reporting Section, Grants Management Section and individual program area sections.

Inter-agency agreements (contracts) will specify the responsibilities of any state department and the DHS in the disbursement of federal funds and reporting the required data and fiscal information to the U.S. Department of Health and Human Services. Involved state departments will cooperate in providing reports, as outlined in the Inter-agency agreement, and with federal investigations undertaken in accordance with section 2608 of the Low Income Home Energy Assistance Act of 1981, as amended.

Audit Process

10.2 Is your LIHEAP program audited annually under the Single Audit Act and OMB Circular A-133?

Yes No

10.3 Describe any audit findings rising to the level of material weakness or reportable condition cited in the A-133 audits, Grantee monitoring assessments, inspector general reviews, or other government agency reviews of the LIHEAP agency from the most recently audited federal fiscal year.

Finding	Type	Brief Summary	Resolved?	Action
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				Taken
2013-077: State Plan Amendment for Home Heating Credit Reduction Factor	significant deficiency	DHS did not amend its State Plan to reflect a change in the reduction factor used to calculate the home heating credit.	no	(1)
2013-078: Home Heating Credit Reimbursement Reconciliation	significant deficiency	DHS had not implemented a process to periodically reconcile Department of Treasury electronic home heating credit detail information to the paper reimbursement billings and summary reports provided by Treasury.	no	(1)
2013-079: Documentation	material weakness	DHS did not document that it verified all client assets when determining eligibility.	yes	(1)
2013-080: Propriety of LIHEAP Funding Payments	Significant deficiency	DHS did not ensure the propriety of LIHEAP funded SER energy payments.	No	(1)
2013-081: Energy Direct Program Compliance	Significant deficiency	DHS did not monitor an energy provider's performance of its contractual obligations to ensure that payments were made on behalf of eligible clients.	No	(1)

(1) A corrective action plan is included in the audit report. The State of Michigan Single Audit Report can be found at:
http://audgen.michigan.gov/finalpdfs/13_14/r000010014.pdf.

10.4 Audits of Local Administering Agencies

- What types of annual audit requirements do you have in place for local administering agencies/district offices?
 - Local agencies/district offices are required to have an annual audit in compliance with the Single Audit Act and OMB Circular A-133.
 - Local agencies/district offices are required to have an annual audit (other than A-133).
 - Local agencies/district offices' A-133 or other independent audits are reviewed by Grantee as part of compliance process.
 - Grantee conducts fiscal and program monitoring of local agencies/district offices.

Compliance Monitoring

- 10.5 Describe the Grantee's strategies for monitoring compliance with the Grantee's and Federal LIHEAP policies and procedures by:

Grantee employees:

- Internal program review
- Departmental oversight
- Secondary review of invoices and payments
- Other program review mechanisms are in place. Describe:

Local Administering Agencies/District Offices:

- On-site evaluation
- Annual program review
- Monitoring through Central Database
- Desk reviews
- Client File Testing/Sampling
- Other program review mechanisms are in place. Describe:

- 10.6 Explain, or attach a copy of, your local agency monitoring schedule and protocol.

BCAEO conducts program monitoring for weatherization. We monitor 10% file reviews and 5% onsite technical monitoring. Grant managers monitor expenditures and grant compliance throughout the grant period. Annual programmatic and fiscal monitoring are completed at each agency along with quarterly desk reviews.

MEAP grantees provide financial status reports on a monthly basis and provide program status reports on a quarterly basis, which are reviewed by MPSC staff and includes a sampling of client eligibility documentation.

- 10.7 Describe how you select local agencies for monitoring reviews?

Site Visits: 5% of LIHEAP weatherized homes are monitored based on monthly production reports from CAAs

Desk Reviews: 10% of LIHEAP weatherized homes are monitored based on monthly production reports from CAAs

- 10.8 How often is each local agency monitored? Annually. More often if necessary.
- 10.9 What is the combined error rate for eligibility determinations? Data not currently available.
- 10.10 What is the combined error rate for benefit determinations? Data not currently available.
- 10.11 How many local agencies are currently on corrective action plans for eligibility and/or benefit determination issues? Data not currently available.
- 10.12 How many local agencies are currently on corrective action plans for financial accounting or administrative issues? Data not currently available.

Section 11: Timely and Meaningful Public Participation, 2605(b)(12) – Assurance 12, 2605(c)(2)

11.1 How did you obtain input from the public in the development of your LIHEAP plan?

Check all that apply:

- Tribal Council meeting(s)
- Public Hearing(s)
- Draft Plan posted to website and available for comment
- Hard copy of plan is available for public view and comment
- Comments from applicants are recorded
- Request for comments on draft Plan is advertised
- Stakeholder consultation meeting(s)
- Comments are solicited during outreach activities
- Other, describe:

11.2 What changes did you make to your LIHEAP plan as a result of this participation?

Public Hearings, 2605(a)(2)

11.3 List the date(s) and location(s) that you held public hearing(s) on the proposed use and distribution of your LIHEAP funds?

Date	Event Description
July 23, 2014	Public hearing for LIHEAP from 10 a.m.-Noon at the Grand Tower, 235 S. Grand Ave., Dempsey Room, Lansing, Michigan
July 24, 2014	Public hearing for LIHEAP from 10 a.m.-Noon at Cadillac Place, Conference Room L-150, 3040 W. Grand Blvd., Detroit, Michigan

11.4 How many parties commented on your plan at the hearing(s)?

11.5 Summarize the comments you received at the hearing(s).

11.6 What changes did you make to your LIHEAP plan as a result of the public hearing(s)?

Section 12: Fair Hearings, 2605(b)(13) – Assurance 13

12.1 How many fair hearings did the grantee have in the prior Federal fiscal year? Unknown.

12.2 How many of those fair hearings resulted in the initial decision being reversed? Unknown.

12.3 Describe any policy and/or procedural changes made in the last Federal fiscal year as a result of fair hearings? None.

12.4 Describe your fair hearing procedures for **households whose applications are denied**.

Clients have the right to contest a department decision affecting eligibility or benefit levels whenever they believe the decision is incorrect. The department provides an administrative hearing to review the decision and determine its appropriateness.

The applicant, or their representative, has 90 calendar days from the date of the written notice of case action to request a hearing. The request must be received in the local office within the 90 days.

Department of Treasury Home Heating Credit applicants will be advised of their opportunity to discuss any denial with Department of Treasury personnel. Applicants will be provided with a fair hearing which will be conducted by the Michigan Department of Treasury.

12.5 When and how are applicants informed of these rights?

The application forms and each written notice of case action must inform clients of their right to a hearing. These include an explanation of how and where to file a hearing request, and the right to be assisted by and represented by anyone the client chooses.

Department of Treasury Home Heating Credit applicants will be advised of their rights to a hearing if their Home Heating Credit application is denied.

12.6 Describe your fair hearing procedures for **households whose applications are not acted on in a timely manner**.

The application forms and each written notice of case action must inform clients of their right to a hearing. An individual may request a hearing because an application for assistance not acted upon within the 10-day standard of promptness.

12.7 When and how are applicants informed of these rights?

The applicant is informed of this information, in writing, on the application form and also on the eligibility determination notice, issued once the level of benefits has been determined.

Section 13: Reduction of home energy needs, 2605(b)(16) – Assurance 16

13.1 Describe how you use LIHEAP funds to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance?

MEAP legislation requires that, "Energy assistance must include services that will enable participants to become or move toward becoming self-sufficient, including assisting participants in paying their energy bills on time, assisting participants in budgeting for and contributing to their ability to provide for energy expenses, and assisting participants in utilizing energy services to optimize on energy efficiency. By October 1, 2014, each entity that carries out a contract with the department under this section shall provide or coordinate these services. The department shall attempt to coordinate its efforts with the efforts of other state departments or agencies to assist low-income households in becoming or moving toward becoming self-sufficient.

13.2 How do you ensure that you don't use more than 5% of your LIHEAP funds for these activities?

Currently no allocations are specifically designated to Assurance 16 activities. However, LIHEAP crisis funds are used, in addition to State dollars, to fund the MEAP program.

13.3 Describe the impact of such activities on the number of households served in the previous Federal fiscal year.

13.4 Describe the level of direct benefits provided to those households in the previous Federal fiscal year.

13.5 How many households applied for these services?

13.6 How many households received these services?

Section 14: Leveraging Incentive Program, 2607A

14.1 Do you plan to submit an application for the leveraging incentive program?

Michigan Department of Human Services LIHEAP State Plan FY 2015 DRAFT

Yes No

14.2 Describe instructions to the third parties and/or local agencies for submitting LIHEAP leveraging resource information and retaining records.

14.3 For each type of resource and/or benefit to be leveraged in the upcoming year that will meet the requirements of 45 C.F.R. § 96.87(d)(2)(iii), describe the following:

What is the type of resource or benefit?	What is the source(s) of the resource?	How will the resource be integrated and coordinated with the LIHEAP program?

Section 15: Training

15.1. Describe the training you provide for each of the following groups:

a. Grantee Staff:

Formal training on grantee policies and procedures

How often?

Annually

Biannually

As needed

Other – Describe: DHS Office of Workforce Development & Training, in conjunction with the LIHEAP program office, develops training materials when policy changes are made. The materials are shared with local office DHS staff.

Employees are provided with policy manual

Other – Describe:

b. Local Agencies:

Formal training conference

How often?

Annually

Biannually

As needed

Other – Describe:

On-site training

How often?

Annually

Biannually

As needed

Other – Describe:

Employees are provided with policy manual

Other – Describe: As needed.

c. Vendors

Formal training conference

How often?

Annually

Biannually

As needed

Other – Describe:

Policies communicated through vendor agreements

Policies are outlined in a vendor manual

Other – Describe: Changes in policy requirements are typically communicated through mail and discussed at the monthly Coalition to Keep Michigan Warm meetings.

15.2. Does your training program address fraud reporting and prevention?

Yes

No

Section 16: Performance Goals and Measures, 2605(b)

16.1 Describe performance goals and measures that will be tracked for the upcoming Federal fiscal year.

The LIHEAP program office is working with the Department's Quality Assurance and Internal Compliance division to incorporate the SER program into the internal audit/review process. Once this is successfully implemented, we can determine error-prone areas and target training efforts to increase payment accuracy while decreasing error rates.

16.2 Summarize results of performance goals and measures for the prior Federal fiscal year. N/A

Section 17: Program Integrity, 2605(b)(10)

17.1 Fraud Reporting Mechanisms

- a. Describe all mechanisms available to the public for reporting cases of suspected waste, fraud, and abuse.
- Online Fraud Reporting
 - Dedicated Fraud Reporting Hotline
 - Report directly to local agency/district office or Grantee office
 - Report to State Inspector General or Attorney General
 - Forms and procedures in place for local agencies/district offices and vendors to report fraud, waste, and abuse.
 - Other – describe:
- b. Describe strategies in place for advertising the above-referenced resources.
- Printed outreach materials
 - Addressed on LIHEAP application
 - Website
 - Other – describe: Information on reporting fraud is included on the Department’s Assistance Application, which is used for other state and federally funded assistance programs such as TANF and SNAP.

17.2 Identification Documentation Requirements

- a. Indicate which of the following forms of identification are required or requested to be collected from LIHEAP applicants or their household members.

REQUIRED Type of Identification Collected	Collected from Whom?		
	Applicant Only	All Adults in HH	HH Members Seeking Assistance*
Social Security Card is photocopied and retained	Required <input type="checkbox"/>	Required <input type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input checked="" type="checkbox"/>	Requested <input checked="" type="checkbox"/>	Requested <input checked="" type="checkbox"/>
Social Security Number (without actual card)	Required <input checked="" type="checkbox"/>	Required <input checked="" type="checkbox"/>	Required <input checked="" type="checkbox"/>
	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>	Requested <input type="checkbox"/>
Government-issued identification card (i.e.: driver’s license, state ID, Tribal ID, passport, etc.)	Required <input type="checkbox"/>	Required <input type="checkbox"/>	Required <input type="checkbox"/>
	Requested <input checked="" type="checkbox"/>	Requested <input checked="" type="checkbox"/>	Requested <input checked="" type="checkbox"/>
Other:	Required <input type="checkbox"/>	Required <input type="checkbox"/>	Required <input type="checkbox"/>

*Households may include members who are not seeking assistance and may not be included in the household count.

- b. Describe any exceptions to the above policies.

17.3 Identification Verification

Describe what methods are used to verify the authenticity of identification documents provided by clients or household members.

- Verify SSNs with Social Security Administration
- Match SSNs with death records from Social Security Administration or state agency
- Match SSNs with state eligibility/management system (e.g., SNAP, TANF)
- Match with state Department of Labor system
- Match with state and/or federal corrections system
- Match with state child support system
- Verification using private software (e.g., The Work Number)
- In-person certification by staff
- Match SSN/Tribal ID number with tribal database
- Other – describe:

17.4 Citizenship/Legal Residency Verification

What are your procedures for ensuring that household members are U.S. citizens or aliens who are qualified to receive LIHEAP benefits?

- Clients sign an attestation of citizenship or legal residency
- Clients' submission of Social Security cards is accepted as proof of legal residency
- Noncitizens must provide documentation of immigration status
- Citizens must provide a copy of their birth certificate, naturalization papers, or passport
- Noncitizens are verified through the SAVE system
- Tribal members are verified through Tribal database/Tribal ID card
- Other – describe: The data match with the Social Security Administration is sufficient verification of citizenship

17.5 Income Verification

What methods does your agency utilize to verify household income?

- Require documentation of income for all adult household members
 - Pay stubs
 - Social Security award letters
 - Bank statements
- Tax statements
- Zero-income statements
- Unemployment Insurance letters
- Other – describe:

- Computer data matches:
 - Income information matched against state computer system (e.g., SNAP, TANF)
 - Proof of unemployment benefits verified with state Department of Labor
 - Social Security income verified with SSA
 - Utilize state directory of new hires
 - Other – describe: Electronic data exchanges including the department's internal Consolidated Inquiry and Single Online Query for income records.

Section 18: Protection of Privacy and Confidentiality

Describe the financial and operating controls in place to protect client information against improper use or disclosure.

- Policy in place prohibiting release of information without written consent
- Grantee LIHEAP database includes privacy/confidentiality safeguards
- Employee training on confidentiality for:
 - Grantee employees
 - Local agencies/district offices
- Employees must sign confidentiality agreement
 - Grantee employees
 - Local agencies/district offices
- Physical files are stored in a secure location
- Other – describe:

Section 19: Verifying the Authenticity of Energy Vendors

What policies are in place for verifying vendor authenticity?

- All vendors must register with the State
- All vendors must supply a valid SSN or TIN/W-9 form
- Vendors are verified through energy bills provided by the household
- Grantee and/or local agencies/district offices perform physical monitoring of vendors
- Other – describe, and note any exceptions to policies above:

Section 20: Benefits Policy – Gas and Electric Utilities

What policies are in place to protect against fraud when making benefit payments to gas and electric utilities on behalf of clients?

- Applicants required to submit proof of physical residency
- Applicants must submit current utility bill
- Data exchange with utilities that verifies:
 - Account ownership
 - Consumption
 - Balances
 - Payment history
 - Account is properly credited with benefit
 - Other – describe:
- Centralized computer system/database tracks payments to all utilities
- Centralized computer system automatically generates benefit level
- Separation of duties between intake and payment approval
- Payments coordinated among other heating assistance programs to avoid duplication of payments
- Payments to utilities and invoices from utilities are reviewed for accuracy
- Computer databases are periodically reviewed to verify accuracy and timeliness of payments made to utilities
- Direct payment to households are made in limited cases only
- Procedures are in place to require prompt refunds from utilities in cases of account closure
- Vendor agreements specify requirements selected above, and provide enforcement mechanism
- Other – describe:

Section 21: Benefits Policy — Bulk Fuel Vendors

What procedures are in place for averting fraud and improper payments when dealing with bulk fuel suppliers of heating oil, propane, wood, and other bulk fuel vendors?

- Vendors are checked against an approved vendors list
- Centralized computer system/database is used to track payments to all vendors
- Clients are relied on for reports of non-delivery or partial delivery
- Two-party checks are issued naming client and vendor
- Direct payment to households are made in limited cases only
- Conduct monitoring of bulk fuel vendors
- Bulk fuel vendors are required to submit reports to the Grantee
- Vendor agreements specify requirements selected above, and provide enforcement mechanism
- Other – describe:

Section 22: Investigations and Prosecutions

Describe the Grantee's procedures for investigating and prosecuting reports of fraud, and any sanctions placed on clients/staff/vendors found to have committed fraud.

- Refer to state Inspector General
- Refer to local prosecutor or state Attorney General
- Refer to US DHHS Inspector General (including referral to OIG hotline)
- Local agencies/district offices or Grantee conduct investigation of fraud complaints from public
- Grantee attempts collection of improper payments. If so, describe the recoupment process.
- Clients found to have committed fraud are banned from LIHEAP assistance. For how long is a household banned?
- Contracts with local agencies require that employees found to have committed fraud are reprimanded and/or terminated
- Vendors found to have committed fraud may no longer participate in LIHEAP
- Other — describe: Providers who are unwilling to cooperate in the refund/recoupment process will have their provider enrollment terminated. In some instances the State's Department of Treasury may impose a tax offset to collect the amount over issued.

When an over issuance is found, it is the responsibility of the worker to determine the amount and contact the provider to obtain a refund. The worker must provide supporting documentation of the over issuance to the local fiscal office. The fiscal unit will establish an account receivable and proceed with the collection letter.

Providers should be instructed to include the customer name, address and case number and return the overpayment to:

Department of Human Services
Cashiers Unit
P.O. Box 30802
Lansing, MI 48909