

# **Issue Brief**

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Intake coordination between energy vendors, fuel funds, and LI-HEAP can provide many benefits to all parties involved. The benefits of streamlining the intake process for multiple programs include increased efficiency of collecting and sharing eligibility data and lowering administrative costs of collecting and reporting data. Coordinating intake for more than one program also benefits clients by simplifying the application process and helping them learn about, and potentially receive, other social services for which they qualify.

This issue brief will discuss state LIHEAPs that have integrated utility assistance and fuel fund programs into their intake processes, explain how the exchange of information is achieved, and examine the benefits and challenges to such intake coordination. Intake coordination information for this brief was gathered from various sources, including LIHEAP state plans, LIHEAP webinars, energy assistance applications, fuel fund and utility reports, and through contacts in each state. In addition to discussing the benefits of coordination for LIHEAP, this issue brief will also explore how intake coordination benefits the lowincome clients who are seeking assistance.

# **UTILITY PROGRAMS**

Many utility fuel funds, rate assistance, and energy efficiency programs are administered by the same agencies that administer LIHEAP. For example, Maryland's ratepayer-funded Electric Universal Service Program (EUSP) is administered by the Maryland Department of Human Resources, which is also the LIHEAP grantee. Customers of Maryland's energy vendors who are interested in energy assistance can apply at local agencies for both LIHEAP and EUSP.

In Massachusetts, clients may be automatically enrolled in their utility's discount program if they apply for and receive certain other means-tested benefits that include SNAP and SSI. The Executive Office of Health and Human Services (EOHHS) administers these programs

# Resources for Intake Coordination

- "Better Together: Linking and Leveraging Energy Programs for Low-Income Households," U.S. EPA State and Local Climate and Energy Program, November 19, 2015
- "Coordination of LIHEAP with State and Utility Assistance
   Programs," APPRISE, June 28, 2011
- "Integrating Health and Human Services Programs to Expand Eligibility,"
  LIHEAP Clearinghouse, January 2015
- "Leveraging and LIHEAP: Providing Non-Federal Funds for Energy Assis- tance," LIHEAP Clearinghouse, Febru-ary 2015
- "LIHEAP IM 2010-13: Use of LIHEAP Funds Coordinated with Vendor Assistance Programs," HHS Memorandum, July 21, 2010
- "LIHEAP Memorandum 880: LIHEAP Negotiations With Non-regulated Fuel Vendors," LIHEAP Clearinghouse, August 2015
- "Supplemental LIHEAP Funds: Source and Spending," LIHEAP Clearinghouse, January 2015

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and maintains a database of beneficiaries. EOHHS asks applicants for these means-tested benefit programs to give their permission to release limited information (name, address, a unique identifying number) to utility companies. Likewise, the utilities electronically share customer lists with EOHHS. The Department of Transitional Assistance, a department within EOHHS, is responsible for identifying eligible utility customers and then directs the utilities to automatically enroll them in discount programs, unless the customers opt out.

In New Hampshire, utilities work with six community action agencies located throughout the state to identify and enroll eligible customers for the statewide Electric Assistance Program (EAP) that is funded by ratepayers of regulated utilities. To receive an EAP benefit at any time during the year, customers must apply through their local agency. The same community action agencies also administer the year-round Fuel Assistance Program, the state's LIHEAP.

#### **Rate Assistance**

#### Colorado

In 2011, the Colorado Public Utilities Commission (CPUC) adopted rules requiring regulated utilities to implement rate assistance programs for low-income customers. The five regulated utilities decided to offer Percentage of Income Payment Plans (PIPPs) that are funded by ratepayer surcharges.

Colorado LIHEAP has a centralized data system where the utilities upload daily heating cost data. The state uses these data to help determine LIHEAP eligibility and provides information to the utilities on eligible LIHEAP clients. The CPUC has allowed utilities to keep PIPP income eligibility at the same level as LIHEAP to make administering the PIPPs easier. The utility companies conduct outreach for their PIPPs and administer the customer PIPP accounts.

The state requires LIHEAP applicants to sign a waiver acknowledging that the signer is allowing the utility to

give certain organizations customer data, meter readings, and information regarding participation in utility programs. The clients are then informed that their information will be used to:

- Provide them with products or services as requested
- Offer products or services that may be of interest to them
- Determine eligibility for available energy programs
- Analyze their energy usage

Xcel Energy, the utility with the largest number of LI-HEAP applicant households in Colorado, also offers an online Energy Assistance Portal. The portal is available to local agencies that have a valid state vendor agreement with Xcel Energy and that have registered with the utility. Access to the database is granted with a signed customer data-sharing release.

# Ohio

Ohio's LIHEAP also works closely with its local utilities. All of Ohio's biggest investor-owned utilities participate in the nation's largest and oldest Percentage of Income Payment Plan, PIPP Plus, which offers low-income gas and electric customers a more affordable monthly payment plan. Eligibility for PIPP Plus is designed to be consistent with Ohio LIHEAP guidelines and verification criteria, though the two programs use two different income eligibility levels. (PIPP Plus generally benefits those households whose incomes are under 100 percent of the federal poverty line.)

The electric portion of the PIPP is administered by the LIHEAP grantee, the Ohio Development Services Agency (ODSA). The gas portion of the PIPP is administered by the gas utilities with oversight from the Public Utilities Commission of Ohio. LIHEAP sub-grantees also handle intake functions for the gas utilities through contractual arrangements.

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According to its LIHEAP Plan, ODSA ensures that LI-HEAP households receive the most comprehensive combination of services possible by referring clients to the Home Weatherization Assistance Program, PIPP Plus, fuel funds and utility weatherization programs during the initial inquiry process at intake, all of which use the same application. When providing information about their utility, applicants sign up for the PIPP Plus program or re-verify their eligibility for the new heating season if they are already enrolled.

Language at the end of the application in the PIPP Plus's Terms of Agreement allows the client's utility companies to:

"release [the applicant's] name, address, telephone number, household member information, amount of [the applicant's] utility usage, and total past due amount to ODSA and agencies that perform weatherization services and/or provide other energy related services."

This agreement makes it easy for customer information to be shared between LIHEAP, PIPP Plus, and the state's weatherization assistance program. Agencies also have access to human services websites maintained by each major utility which allow access to customer billing histories and other relevant information. This data access increases efficiency and accuracy during intake. Having just one application for all of these programs streamlines the application process further for both the client and the participating programs, while reducing administrative costs.

# **Connecticut**

In Connecticut, utilities are encouraged by the state's Public Utilities Regulatory Authority (PURA) to partner with area LIHEAP agencies to provide assistance to low-income households pursuant to Connecticut General Statutes § 16-262c(b)(5). Eligible customers must, among other things, (1) comply with an agreement

they enter into with the company to amortize their arrearage and (2) apply for energy assistance benefits. Gas and electric companies must match both the payments participating customers make towards their arrearages and benefits they receive under energy assistance programs. According to PURA's website, Connecticut utility companies are directed to request that local LIHEAP agencies help each client complete the Matching Payment Program (MPP) application during the LIHEAP intake process. As a result, detailed information about the MPP is provided to each local LIHEAP agency in order to facilitate the application process and encourage increased awareness of the arrearage forgiveness program.

The utility companies, in turn, try to meet the needs of financially-challenged customers by providing information about weatherization programs, energy assistance, as well as the MPP to their customers through their customer service representatives. Representatives direct at-risk customers to LIHEAP agencies to apply for assistance.

In order to complete the MPP applications for each LIHEAP client, utilities grant access to their respective secure websites and portals to intake employees, when available. This enables the local LIHEAP staff to access customers' historical billing and payment information. This access helps "ease and speed the energy assistance intake process by making customer's utility documentation readily available." Permission to access client information is provided to the local intake staff through a signed waiver on the LIHEAP application. It states that the client agrees that their energy vendors may provide the community action agency or the State of Connecticut information about their energy account and/or usage.

To further ease the administrative burden, utility companies automatically enroll customers who participated in MPP and who received LIHEAP benefits the previous year. This automatic renewal is credited with promoting program participation and with streamlin-

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ing the intake process for utility companies and intake staff at the local LIHEAP agencies.

# **FUEL FUNDS**

#### Colorado

Colorado's LIHEAP works with the Colorado Energy Office and Energy Outreach Colorado (EOC) through the Commission on Low Income Energy to coordinate state-funded energy assistance services.

EOC is a non-profit that raises funds for energy assistance and typically donates funds to the state LIHEAP which enables LIHEAP to provide larger benefits to clients during the heating program.

Because federal LIHEAP funds only cover a short period of time in Colorado, EOC developed a year-round assistance program for all fuel types through a partnership with over 125 community-based assistance agencies across the state. Applicants desiring energy assistance are required to apply for LIHEAP first. In cases where the clients seeking energy assistance do not qualify for LIHEAP because their income exceeds the eligibility limit, applicants can still apply with EOC contractors to receive benefits. Client information is kept in a centralized database to ensure that each client only receives assistance once a year.

In addition to providing extra funds to LIHEAP, EOC is also the state's contracted project manager for the LIHEAP Crisis Intervention Program. EOC provides services that include furnace and boiler repair or replacement, and snow removal to facilitate fuel delivery in rural areas.

#### Wisconsin

In Wisconsin, the LIHEAP grantee works with utility programs and fuel funds. Each local LIHEAP agency is expected to coordinate programs with other entities in their area that provide social services including utility-run programs, other government programs such as

FEMA, or non-profit groups such as the Salvation Army and the Keep Wisconsin Warm/Cool Fund (KWW/CF). Each year, local LIHEAP agencies report on their coordination efforts in a Program Operations and Community Service (POCS) Plan to the LIHEAP grantee. They are required to do this in order to keep the LIHEAP grantee up to date on coordination efforts between the energy assistance providers and community resources/ stakeholders, indicating how they will identify and enroll eligible households in their communities.

The KWW/CF uses the same eligibility requirements as LIHEAP and directs applicants to apply for assistance through their local LIHEAP agency or tribal office. Once deemed eligible for LIHEAP, the applicant information is entered into a separate database, which will produce a payment to the registered vendor.

Vendors must be registered with the state, via a signed state vendor agreement, have an assigned vendor number, and be designated as "active" in the HE+ system in order to receive LIHEAP payments on behalf of the LIHEAP applicants. Payments made by local LIHEAP agencies to vendors include both LIHEAP and non-LIHEAP funds. The HE+ system keeps track of the varying payments made to the vendor on behalf of the client.

# **CLIENT BENEFITS**

Some states are creating centralized online databases for submitting applications. Others are modifying applications so they can be used for multiple assistance programs such as SNAP, TANF, child care, and Medicaid. These multi-program single applications benefit the low-income households by not having separate signup locations and procedures. Having uniform requirements for eligibility facilitates intake for the client and the program administrators. The one-stop application streamlines the process by reducing the amount of time and paperwork needed to apply for multiple programs.

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States that have centralized database systems that allow data exchange between agencies and utilities can provide comprehensive assistance to clients and have better data tracking abilities. Ohio LIHEAP agencies ensure, through the use of a combined Energy Assistance Program application system, that all clients who meet criteria for one federally-funded or stateadministered program will automatically have eligibility determined for the others administered by the Office of Community Assistance. This streamlines the application process, not only for the LIHEAP intake workers, but also the application process for the clients by giving them a central place to apply for all services available to them.

Colorado is in the process of creating such a system, known as the Colorado Program Eligibility Application Kit (PEAK). PEAK, according to Colorado's website, is "an online service for Coloradans to screen and apply for medical, food, cash, and child care assistance programs." Currently, PEAK only screens and notifies clients of their LIHEAP eligibility. However, the LIHEAP application has already been programed into the system and will be activated once the program fully migrates to the new system within the next couple of years.

#### **SUMMARY**

Intake coordination does not come without challenges. A common roadblock to coordination of information between LIHEAP programs and utilities, or non-profit programs such as fuel funds, can stem from legal issues related to data exchange security and confidentiality. Legal assistance may be required to address potential issues in designing intake coordination to protect the security of the data exchanged and adhere to both state and federal regulations regarding client privacy.

While privacy issues are a real concern, there are advantages to adopting comprehensive application methods to further streamline the application process for both intake coordinators and applicants. The benefits involve decreasing paperwork, increasing effectiveness of energy assistance, increasing data accuracy, and helping maintain better records for reporting purposes. With these benefits in mind, coordination between LIHEAPs, utility programs, fuel funds, and other heating assistance programs then becomes an increasingly important component of providing assistance to clients.

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