## Program Year (PY) 2023

# Wisconsin Home Energy Assistance Program (WHEAP) Manual











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## **DISCLAIMER**

The Wisconsin Home Energy Assistance Program (WHEAP) Manual is written by the Wisconsin



Department of Administration (WI DOA), Division of Energy, Housing and Community Resources (DEHCR or "the Division") for use by the contracting WHEAP agencies, counties, and/or tribes administering WHEAP locally. The Division reserves the right to change the policies and guidelines set forth in the WHEAP Manual during the Program Year (PY). Any Division-initiated Informational Transmittals issued via broadcast email subsequent to the publishing of the current PY WHEAP Manual and establishing new or updated policy shall supersede the policies and guidelines set forth in the current PY WHEAP Manual.

Questions or concerns regarding the interpretation of the policies and guidelines set forth in the current PY WHEAP Manual shall be directed to the Division of Energy, Housing and Community Resources' Home Energy Plus (HE+) Help Desk (heat@wisconsin.gov or 608-267-3680).



## **Chapter 1 | Program Introduction**

This chapter presents a broad overview of the Wisconsin Home Energy Assistance Program (WHEAP).

#### 1.1 Program Description WHEAP

Wisconsin Home Energy Assistance Program (WHEAP) is an umbrella term covering two different but very similar programs, one funded by the federal government (Low Income Home Energy Assistance Program, LIHEAP¹) and one funded from fees collected through the electric utilities (**Public Benefits** program, PB). These programs are designed to assist eligible **households** with their heating and electric bills. Both programs (LIHEAP and PB) have very similar functions and design with the major difference being that LIHEAP focuses mostly on heating assistance and PB provides **benefits** for non-heating electric consumption.

The two basic parts of energy assistance are Regular Benefits and **Crisis Assistance**. In addition, a furnace services program is operated under WHEAP.

The funding for energy assistance comes from the LIHEAP block grant (federal funds) and the Wisconsin Public Benefit fund (a fee charged on Wisconsin customers' electric bills).

WHEAP benefits are not guaranteed to eligible households. When funds have been exhausted for a program year, there are no benefits issued to households regardless of eligibility.

Low Income Home Energy Assistance Program
 The Low Income Home Energy Assistance Program (LIHEAP) is a federal program established to provide financial assistance against increases in fuel costs for low-income households.

#### 2. Public Benefits

The Public Benefits program was originally created in 1999 as part of the biennial budget bill. Under this program, a low-income fund was created into which the electric providers in the **state** contribute an amount primarily generated by a fee added to customers' electric bills. The money in this fund is divided between the energy assistance program and the **Weatherization** Assistance Program (WAP).

A provision of this law permits cooperative and municipal utilities to operate a Commitment to Communities Program instead of participating in the state Public Benefits fund. The customers of utilities choosing to operate a Commitment to Community Program are not eligible for energy assistance or Weatherization benefits from the State Public Benefits program. These customers may be eligible for LIHEAP funded program services.

#### 1.1.1 WHEAP - Regular Benefits

Regular Benefits provide assistance with current season heating (LIHEAP) and/or non-heating electric (PB) expenses. Regular Benefits are provided on behalf of eligible households to the fuel vendor (utility or deliverable fuel vendor) or, in a limited number of situations, directly to the

<sup>&</sup>lt;sup>1</sup> **Bolded** words are the first reference of a term or phrase defined in Chapter 10.



**applicant**. Households may be eligible for one or both of the benefits. Applicants may receive only one regular heat and/or one regular electric (non-heating) benefit during each heating season (October 1 to May 15). Regular Benefits are paid out of a central account managed by the **Division of Energy, Housing and Community Resources**, not from an amount allocated to the local WHEAP agency.

Regular Benefits provide assistance with home energy bills and are not intended to cover the total costs of heat or electricity. Regular Benefits may only be applied to the current heating season or program year. Some of the factors affecting the amount (size) of the heat benefit include:

- Total funding available for Regular Benefits in the state;
- The income (reference Chapter 2) level of the household;
- Type of fuel;
- The number of **rooms** in the **dwelling unit**;
- The fuel costs of the household; and
- The type of dwelling unit.

Regular electric (PB) benefits are only available to households served by a utility that participates in the State Public Benefits program. Some of the factors affecting the amount (size) of the electric benefit include:

- Total funding available for Regular Benefits in the state;
- The income level of the household; and
- The electric (non-heating) fuel costs of the household.

Electric costs shall be entered on the application even if the household is not served by a PB participating vendor.

Vendors that do not participate in the PB program administer their own assistance program which is referred to as the Commitment to Community program. Applicants with vendors that do not participate in the PB program must contact their vendor if they wish to apply for assistance from the Commitment to Community program.

#### 1.1.2 WHEAP - Crisis Assistance Benefits

Crisis Assistance, whether LIHEAP or PB, is intended to allow the local WHEAP agency to respond to special situations by dealing with emergency situations or acting proactively to avoid serious problems. Crisis Assistance is a discretionary benefit to households—even if a household is eligible, they may not receive assistance.

Crisis Assistance is categorized by two payment types: **emergency** payments and prevention payments. The eligibility requirements for each are slightly different. Emergency payments are only available during the heating season (October 1 to May 15). Prevention payments are available any time during the program year (October 1 to September 30). Prevention payments can be made on applications where the applicant meets the financial and non-financial eligibility, but the application denied because the application is dated after the heating season.



Crisis Assistance benefits are only paid to providers of goods or services. Applicants never directly receive the benefits.

Crisis Assistance benefits are paid from a central account managed by the Division of Energy, Housing and Community Resources.

#### 1.1.2.1 WHEAP - Crisis Assistance Services

Crisis Assistance Services funds are provided to local WHEAP agencies to provide a mechanism for purchase of services (such as education—energy or financial) and goods (such as Weatherization kits) for **recipients**. These funds may also be used to cover local agency costs of taking and processing **applications** for Crisis Assistance.

#### 1.1.3 WHEAP - Furnace Service

Eligible applicants whose furnace (heating system) ceases to operate or presents a safety threat to the household may be eligible to receive furnace services. The local WHEAP agency must determine eligibility for furnace services before any furnace service is provided. Furnace services are a discretionary benefit to households; even if a household is eligible, they may not receive services.

The **Home Energy Plus (HE+)** Furnace Program eligibility criteria and service requirements are outlined in the Program Services Manual (available on the Division website, <a href="https://energyandhousing.wi.gov">https://energyandhousing.wi.gov</a>). The HE+ Program Services Manual outlines when a repair or replacement is appropriate. Customers must agree to relinquish the old heating system when it is replaced with a new unit.

Furnace services provided to a household through the HE+ Furnace Program and in conformance with the HE+ Program Services Manual requirements will never result in a property lien or in a charge to the eligible household.

Furnace service payments are paid from a central account managed by the Division of Energy, Housing and Community Resources.

#### 1.2 WHEAP - General Eligibility

There are financial and non-financial parts to the **eligibility determination**. Non-financial eligibility includes Wisconsin **Residence**, eligibility to receive federal benefits (for **non-citizens**), provision of a Social Security number (SSN), having an **energy burden**, and other issues. Detailed discussion of non-financial eligibility requirements is presented in <u>Chapter 2</u>.

Financial eligibility requires a household's income to be less than or equal to sixty percent (60%) of the state median income (**SMI**). The income levels for various family sizes are published by the Division of Energy, Housing and Community Resources at the beginning of the heating season. The HE+ Program uses a one-month income test which is annualized to determine program income eligibility. The test period for determining the income level for the household is usually the one month prior to the month of application. If an agency determines that a household's prior month income exceeds the WHEAP eligibility limit, and the household's financial circumstances have recently changed, the agency may use the present month income to establish eligibility. See



Section 2.3.2 for more information. The income for certain income types, such as seasonal wages and self-generated income, have a test period that is based on income received during the 12 months prior to the date of the application, or the previous tax year. A detailed discussion of financial eligibility is presented in <a href="Chapter 2">Chapter 2</a>.

When a household is found to be eligible for Regular Benefits, the determination of eligibility is used for Crisis Assistance and furnace services for the remainder of the program year (October 1 to September 30). Application eligibility does not continue for the remainder of the program year if either the case head or a household member is deceased. A new application shall be processed to establish eligibility for the remaining household members. Crisis Assistance and furnace services have additional eligibility criteria that also must be met. See Chapters 2 and 4, Section 6.3.9, and the HE+ Furnace Program Manual.

#### 1.3 WHEAP - Regular Benefits Payment Determination

Home Energy Assistance heat benefits are primarily based on the relationship of household income to the state median income (SMI), size of the dwelling (number of rooms), dwelling type, and home energy costs. The primary factors affecting the regular electric (non-heating) benefit are the household income and the non-heating electric use. A table of the maximum income allowable for various family sizes is provided on the Division website. The table is also available in the WHEAP brochures sent to the agencies.

#### 1.3.1 General Payment Information

Regular Benefits are provided to eligible households for almost any type of heating fuel used—natural gas, fuel oil, liquefied natural gas (propane), wood, wood pellets, corn pellets, and some other fuel types. The **HE+ System** calculates the Regular Benefit amounts based on the information submitted in the application. The primary factors affecting the benefit level are household income, number of **household members**, fuel type, fuel use, and number of rooms in the dwelling.

The information entered in the Energy Usage section of the WHEAP application must be the reported cost of the household's **primary heating fuel** usage and electric costs. In cases where electric is used for primary heat, total electric costs only need to be entered once.

The HE+ System calculates the benefit for heating and non-heating electric assistance when the application is submitted. The HE+ System generates benefit payments to vendors or customers, and notification letters to customers. The notification letters indicate: 1) the type of benefit(s); 2) the benefit amount(s); 3) the recipient of the benefit; and/or 4) the benefit has been withdrawn, cancelled, or denied along with the denial reason and/or repayment amount (when applicable). No payments will be issued for benefits that are calculated at less than \$30.

#### 1. Income

The HE+ System calculates the household income level. If a household's income level is less than or equal to 60% of the state median income (SMI) level, the household is income eligible. If the household's income level is more than 60% of the SMI level, the household is denied WHEAP benefits as over-income, unless the household has been deemed **categorically eligible**. When a categorically eligible household is over 60% SMI, the



benefits are paid as if the applicant's income is 60% SMI.

#### 2. Energy Costs

To receive a benefit based on actual costs, the bill for home energy costs must be a direct pay account and cannot include charges for a business or from a shared meter (see <a href="Chapter 3">Chapter 3</a> for additional limitations on using actual fuel costs). The HE+ System uses the home energy information entered in Energy Usage section of the application to determine heating and **non-heating electric costs**. If annual fuel usage is not provided during the application process, benefits will be based on the proxy fuel table. When an amount is used from the proxy table to calculate benefits, the fuel use is set at 75% of the projected average cost for the fuel and building type.

The information entered in the Energy Usage section of the application must be the reported cost of the household's **primary heating fuel** usage and electric costs. In cases where electric is used for primary heat, total electric costs only need to be entered once.

#### 3. Comparisons to Heat Proxy Table

The HE+ System automatically compares adjusted actual heating costs to the Heat Proxy Fuel Table. The heat proxy amount is based on 75% of the average costs for the same dwelling type, fuel type and number of rooms.

- a. If the adjusted actual heating costs are greater than two times the proxy for the same dwelling type, fuel type, and number of rooms, benefits will be based on two times the proxy amount, rather than actual costs.
- b. If the adjusted actual heating costs are less than the proxy, benefits will be based on the proxy rather than actual costs.

#### 4. Proxy Fuel Tables

There are situations where actual fuel costs are not available for calculating benefits, such as heat included in rent. To permit calculation of WHEAP benefits an amount is taken from the appropriate proxy table. Each table is a collection of average costs. There are a number of tables to provide numbers based on fuel type and other factors, such as the number of rooms and the fuel used for making hot water.

#### 5. Heat Proxy Table

When annual cost is zero, the HE+ System uses the appropriate amount from the Proxy Fuel Table to calculate the benefit.

The HE+ System reduces the appropriate average heating cost by 25% as an incentive to use actual fuel costs.

#### 6. Electric Proxy Tables

When annual cost is zero, the HE+ System uses the appropriate amount from the Proxy Electric (PB) Table to calculate the benefit. When electric is the only fuel source for the dwelling, the non-heating electric portion is determined by reducing by half the total reported consumption to determine the amount used in calculating the electric benefit (if the applicant is a customer of a Public Benefits participating utility).

#### 7. Number of Rooms

The HE+ System uses the number of rooms in a dwelling as a measure of the size of the



dwelling. In counting the number of rooms, there are areas that are not counted such as bathrooms, unfinished basements, entryways, hallways, laundry rooms, porches, closets, and unheated attics. The maximum number of rooms allowed in the HE+ System is nine (9). See Section 3.4.19 for information on counting the number of rooms.

#### 1.4 WHEAP – General Emergency Crisis and Prevention Assistance Eligibility

To receive Crisis Assistance, households must be eligible for WHEAP as established by an HE+ Application. Customers must have a need for Crisis Assistance and a direct pay relationship with a participating energy vendor. Customers must have paid at least \$25 in the past three months on the energy account for which they are seeking Crisis Assistance. There is a maximum crisis benefit amount that a customer may receive during a program year (October 1 to September 30) and they cannot receive WHEAP Crisis Assistance more than two times during a program year. Agencies may contact the HE+ Help Desk to request an exception to the customer contribution requirement or the maximum crisis benefit amount. See Section 4.2 for more information.

#### 1.5 WHEAP - HE+ Furnace Program Eligibility

Homeowners and some renters who are WHEAP eligible may be eligible for Home Energy Plus (HE+) Program Services. Homes owned by a business are generally not eligible for HE+ Program Services. Exceptions to this shall receive prior approval from the HE+ Help Desk. See the HE+ Program Services Manual for details.

#### 1.6 WHEAP - Application Process

The application for WHEAP benefits is called the HE+ Application. This application is also used to determine eligibility for Weatherization assistance.

Individuals must apply for energy assistance through an approved WHEAP agency for the county/tribe where they reside or apply online at <a href="https://energybenefit.wi.gov/">https://energybenefit.wi.gov/</a>. There is an approved WHEAP agency for each county and for six of the tribes in the state.

Individuals may submit multiple applications during the program year, October 1 to September 30. An applicant may only receive one regular heat benefit and one regular non-heat electric benefit each program year. However, being turned down for benefit(s) during a program year does not preclude future applications during the program year. If circumstances have changed since the "Denied" application, a new application can lead to an award of benefits.

All duplicate applications received by the local agency shall be processed in the HE+ System with any information provided by the applicant. If the applicant chooses to withdraw the application, the application must still be entered in the HE+ System. Exception: see online application.

Applicants must provide complete and accurate information for their household within 30 days of the application date. In order for an application to be considered complete, it must have a dated applicant signature and dated intake worker signature on the Certification Page. The Certification Page provides notice to the applicant regarding use of the information provided and the rights of the applicant. By signing the Certification Page, the intake worker acknowledges that they have verified the applicant's information and agree to comply with the Home Energy Plus Conflict of



Interest/Non-Disclosure Agreement (see Section 8.5.1.1.).

Telephonic signatures are allowed for the Certification Page. A telephonic signature is a recording of the entire Certification Page being read to the customer, the customer acknowledging the statement associated with their signature, and the worker stating their name and the current date. This recorded telephonic signature shall be uploaded to the HE+ System to satisfy the Certification Page upload requirement.

Exceptions may be granted for obtaining a customer signature due to illness or other extenuating circumstances including lack of access to printers/scanners. Agencies shall contact the HE+ Help Desk to obtain an exception on a case-by-case basis.

Online applications do not have a physical Certification Page. When customers apply using the online application, they are provided with the Certification Page language prior to submission. The HE+ System records the date and time the customer "signs" and submits the online application.

#### 1.7 Weatherization Assistance

The HE+ Application is used for both the energy assistance and Weatherization Assistance programs. Both programs have the same basic eligibility requirements, so a single application can be used for both.

#### 1.8 Discrimination Complaints and Administrative Hearings

#### 1.8.1 Discrimination

If an applicant believes they have been discriminated against in any way, the applicant may file a complaint by contacting the Coordinator of the agency where they applied, or any person authorized by the agency to receive discrimination complaints. Federal law prohibits discrimination based on race, color, national origin, sex, age, or **disability**.

#### 1.8.2 Hearings

An individual has the right to apply for energy assistance benefits and to receive a payment or a letter of explanation within 45 days from the date the application process is completed. The application process is not complete until the HE+ System processes the application—determines eligibility, calculates a benefit, and sends a notice of award or denial. If the applicant believes their application has not been processed timely, has been incorrectly denied, or their payment is incorrect, they have the right to request a fair hearing.

The fair hearing process is designed to ensure that customers receive fair consideration and appropriate assistance. It is intended to resolve disputes reasonably and should be processed using the following three steps:

- Step 1: Customers contact the agency that processed the application to request an appeal
- Step 2: Formal appeal to the Division of Energy, Housing and Community Resources (DEHCR)
- Step 3: Appeal to the Division of Hearings and Appeals (DHA)

#### General Fair Hearing Procedures



Customers may initiate an appeal if they believe:

- The regular application was incorrectly denied, incorrectly processed, and/or not processed in a timely manner
- The crisis request was not processed in a timely manner

The customer may withdraw an appeal at any time during the process with written notice.

#### Step 1: Contact with Local WHEAP Agency

Customers have 15 days once they receive their notification letter to contact the local WHEAP agency to request an appeal. The customer contact may be initiated in writing or by telephone. In most instances, customers request an explanation regarding income, eligibility and/or benefit determination. WHEAP agencies shall work with customers and try to resolve the issue(s) prior to submission of a request for an appeal to the Division. The WHEAP agency shall provide a response to the customer within five (5) days of the initial customer contact. The response to the customer may be verbal, if this satisfies the customer. If the customer is not satisfied with the WHEAP agency's response, a written formal appeal may be submitted to the Division. WHEAP agencies shall maintain a log of all appeals and add HE+ System Notes to summarize the appeal.

#### Step 2: Division Formal Appeal

Customers may use the DEHCR Appeals Form or a letter to the Division to submit their request for an appeal. The letter shall include a short statement of the matter to be reviewed. WHEAP agencies shall assist the customer with submitting a written appeal, if needed. At a minimum, the WHEAP agency shall provide the customer with the DEHCR Appeals Form and the address of where the form/letter should be submitted. The completed DEHCR Appeals Form can be mailed to:

DOA/Division of Energy, Housing and Community Resources Attn: Fair Hearing PO Box 7970 Madison, WI 53707

or it can be emailed to the HE+ Help Desk at <a href="heat@wisconsin.gov">heat@wisconsin.gov</a>. WHEAP agencies shall immediately notify the Division via the HE+ Help Desk when a customer has requested an appeal.

When the Division receives an appeal, Division staff will:

- Notify the WHEAP agency that an appeal has been received
- Ask the WHEAP agency to forward copies of all applicable documents to the Division including, but not limited to:
  - o A copy of the WHEAP Application (if in paper form)
  - Copies of income and eligibility documentation
  - o Copies of all pertinent correspondence between the applicant and local agency



After receipt of the requested documents from the WHEAP agency, the Division's next steps are:

- Review the details relevant to the appeal
- Check compliance with the WHEAP policies, procedures, and applicable statutes
- Respond in writing to the customer within seven (7) days of receipt of all appeal documents. The response will be sent using Certified Mail and with "Return Receipt Requested". Content in the written correspondence includes:
  - A summary of local WHEAP agency actions
  - Citation of the WHEAP policies relevant to the appeal
  - o Statement of the appeal decision and how the issue will be resolved, if applicable
  - o Information regarding how to request the next stage of the appeal process
  - The Wisconsin Division of Hearings and Appeals address

#### Step 3: Division of Hearings and Appeals

If the customer is not satisfied with the Division determination, they may request an appeal to the Wisconsin Division of Hearings and Appeals (DHA). Once the Division and the local agency receive a DHA request for an appeal, the local agency shall follow their local formal fair hearing process.

If the customer has not completed Steps 1 or 2 and directly files a formal appeal with DHA, the local agency shall attempt to contact the customer for a possible resolution prior to the DHA hearing.



## **Chapter 2 | Program Eligibility**

#### 2.1 General Eligibility Rules and Guidelines

The Home Energy Plus (HE+) Application is used to process regular energy assistance benefits, establish eligibility for Crisis Assistance, and establish eligibility for the Weatherization Assistance Program (WAP). HE+ Applications are submitted online, by phone with either the local WHEAP agency or the statewide Customer Care Center, by mail, or in-person with the local WHEAP agency. The eligibility criteria for WHEAP and WAP follow the same guidelines—the income limits are the same; however, WAP has structural criteria that may include or exclude a dwelling unit—which means while the household may be eligible, the dwelling could be ineligible.

Eligibility is based on the non-financial and the financial requirements. The applicant must meet <u>both</u> sets of requirements to be eligible for Home Energy Assistance. Financial and non-financial eligibility criteria are assessed based on household composition and circumstances on the date of application for energy assistance.

Households denied a heating benefit or a PB (electric) benefit during the heating season may reapply for the denied benefit if the conditions leading to denial of that benefit (heat or electric) have changed. A household may re-apply multiple times if not deemed eligible on earlier applications. Households may apply throughout the year for eligibility. Households applying after May 15 will not be eligible for Regular Benefits but should be encouraged to complete their applications. While the application will be denied for Regular Benefits because it was submitted after the end of the heating season, eligible households may still receive Prevention Assistance, HE+ Program Services, and/or Weatherization services. If a customer attempted to apply on or before May 15 but faced challenges in reaching their local agency by May 15, their application may be backdated to May 15 as long as the application is completed between May 16 and June 15. A System Note explaining why the application was backdated to May 15 is required.

For an application to be considered for regular heat/electric benefits, it must be initiated before the end of the heating season. An applicant is eligible for only one heating and one electric benefit per heating season. Applications must be entered/processed in the chronological order in which they were received. The application completed with the first chronological date, when more than one application from an applicant exists, will have precedence in processing.

Each application shall have a completed Certification Page which includes a dated applicant and a dated agency staff signature. Signatures on "Withdrawn", incomplete, and "Denied" applications may not be used for a new application.

There is no entitlement to WHEAP or WAP benefits—being eligible does not mean Regular Benefits, Crisis Assistance, Furnace, or Weatherization benefits will be provided.

Households containing an individual who was a case head on a "Paid" application during the current heating season are not eligible for regular heating/electric benefits. However, such a household may be considered for Crisis Assistance if all other eligibility requirements are satisfied.

## 2.2 Non-Financial Eligibility



Non-financial eligibility includes several types of tests, and households must satisfy the requirements of each test. These tests include residence, citizenship or immigrant status, valid SSN, student status, and energy burden.

#### 2.2.1 Applicant/Case Head

An eligible case head must have a validated SSN and be a U.S. citizen or an eligible non-citizen. If the case head is an ineligible non-citizen, the application will deny. The HE+ System automatically generates a letter stating that the household was denied. If there is an eligible non-citizen or U.S. citizen of any age in the household, the worker must encourage her/him to apply (become the case head).

A case head must be 18 years or older, or be a **minor head-of-household**, or be a child who meets one of the following exceptions:

- 1. All adults in the household are ineligible non-citizens, and:
  - a. The dependent child is either a citizen or an eligible non-citizen; and
  - b. The child has an SSN.
- 2. An emancipated minor over 15 may be a case head if the minor is living independently and:
  - a. Is married; or
  - b. Was married; or
  - c. Is the principal support of a child; or
  - d. Has visible independent means of support and cannot be claimed as a dependent on the income tax return of someone not in the household.

#### 2.2.2 Residence

A person who lives in Wisconsin and makes Wisconsin their principal residence meets the Wisconsin portion of the residence requirement. They must also intend to remain in Wisconsin.

A person must apply for energy assistance at the agency in the county/tribe where they live on the date of the application. An applicant/household member with multiple residences must apply based on their primary residence. When an applicant/household member resides in more than one residence, the local WHEAP agency must indicate in HE+ System Notes on what basis they determined the primary residence. Applications for an address that has been determined to not be the primary residence will deny as an "ineligible dwelling".

Applicants who receive LIHEAP assistance in another state during a heating season are not Wisconsin residents for the same heating season.

#### 2.2.2.1 Type of Residence

Only applicants living in an eligible dwelling are eligible for WHEAP benefits. If a dwelling is not listed in Table 2.1 below, workers shall contact the HE+ Help Desk for assistance in determining the eligibility of a dwelling. If an applicant resides in a motel, hotel, or a stationary RV or camper; the worker shall contact the HE+ Help Desk to determine if the applicant resides in an eligible dwelling.



Table 2.1: Dwelling Eligibility

Eligible Dwellings	Ineligible Dwellings
Single Family House	Secondary home (e.g., vacation home, seasonal home)
Multi-Unit Building with 2 or more units (e.g., Duplex, Condo, Apartment, Townhouse, Studio Apartment, Flat)	Vehicle
Mobile Home	Assisted living facility or nursing home
Adult Family Home (as licensed by the Wisconsin Department of Health Services)	Group home, halfway house, most motel and hotel situations*, all YMCA/YWCA, Community-Based Residential Facility (CBRF), or foster home**
	Government or institutional facility (e.g., jail, hospital, care institution)
	Deer Stand
	Abandoned building or space
	Tent
	A home rented through Airbnb or similar service for short-term rentals***

<sup>\*</sup>Must be primary residence and have an energy burden. Agencies must contact the Help Desk for approval for all applicants residing in a motel or hotel.

#### **2.2.2.2 Roomers**

A **roomer** is a person who rents a sleeping room individually from the building owner and shares common living space with other residents of the building. Individuals who rent separate sleeping rooms in a residence and share common living space share an energy burden and are considered to be an economic unit. While a roomer may not share in providing, or being provided for, the necessities of life with other residents of the structure, they are still part of the same economic unit for the purposes of WHEAP because they share an energy burden.

#### 2.2.2.3 Homeless

A **homeless** applicant who has proof of a permanent address they will be moving into may be eligible for an energy assistance benefit if the following conditions are met:

- Verification of a move to a permanent address. This should be verified by a lease agreement, phone call to the landlord, or information from a homeless shelter.
- The applicant must have selected a vendor to provide service in their new residence unless energy service is included in the rent or paid to the landlord in a separate payment.
- If the homeless applicant cannot secure a home energy account due to large arrearages on a previous account, or does not have the money for a deposit, prevention services may be used to assist them with securing energy services.

<sup>\*\*</sup>This refers to a foster group home or similar facility, not a private family household that includes foster child(ren).

<sup>\*\*\*</sup>The owner of a home rented through Airbnb or similar service may be eligible if the owner lives in the home full-time and is income eligible.



It may be necessary for the local WHEAP agency or a homeless shelter to assist the applicant in gathering information or obtaining a current vendor and an account number.

#### 2.2.2.4 Non-citizens

If an individual is not a **U.S. citizen**, they shall be identified as either an eligible or ineligible non-citizen for WHEAP benefits.

If the applicant states a household member does not have a Social Security number (SSN) or valid immigration records, the individual shall be marked an **ineligible non-citizen**. This individual may not be the case head of the application. See Sections 2.2.1 and 2.2.6.2 for more information.

Before a non-citizen is marked an **eligible non-citizen** on the HE+ Application, the local agency intake staff must complete the following steps:

- 1. Run the provided SSN through the verification process. The SSN must be positively verified before proceeding to the next steps in eligibility determination.
- 2. If the SSN has been verified, verify if the individual is receiving FoodShare or any form of monthly Social Security income.
  - a. If yes to either, mark the individual an "Eligible Non-citizen" and document in HE+ System Notes the method of verifying receipt of FoodShare or Social Security Income.
  - b. If no, each individual must be defined as one of the following categories, according to the United States Citizenship and Immigration Services (USCIS), in order to mark an eligible non-citizen:
    - i. A non-citizen lawfully admitted for permanent residence under the Immigration and Nationality Act (INA)
    - ii. A non-citizen granted asylum under section 208 of the INA
    - iii. A refugee admitted to the United States under section 207 of the INA
    - iv. A non-citizen paroled into the United States under section 212(d)(5) of the INA for at least one year
    - v. A non-citizen whose deportation is being withheld under section 243(h) of the INA as in effect prior to April 1, 1997, or whose removal is being withheld under section 241(b)(3) of the INA
    - vi. A non-citizen granted conditional entry pursuant to section 203(a)(7) of the INA as in effect prior to April 1, 1980
    - vii. A non-citizen who is a Cuban or Haitian entrant as defined in section 501(e) of the Refugee Education Assistance Act of 1980
    - viii. A non-citizen who (or whose child or parent) has been battered or subjected to extreme cruelty in the United States and otherwise satisfies the requirements of § 431(c)
    - ix. Amerasians under the Amerasian Immigration Act of 1982
    - x. Native Americans born abroad
    - xi. Trafficking victims who have been classified with a T nonimmigrant status



An individual meeting one of the above categories must provide one of the following forms of documentation. It is the applicant's responsibility to provide non-expired documentation of their lawful status in the United States. Examples of documentation to support lawful status include:

- Permanent Resident Card (I-551)
- Unexpired foreign passport stamped by the U.S. government indicating that the holder has been "Processed for I-551"
- Permanent resident Re-entry Permit (I-327)
- Arrival Departure Form I-94 with "Temporary I-551" stamp and holder's photograph affixed
- Travel Document issued to Permanent Residents (I-327)
- Travel Document issued to Refugees (I-571)
- Form I-94 stamped with one of the following statuses: Asylee, Parolee or Parole, Refugee, Asylum, HP-humanitarian parolee, PIP-public interest parolee, or Cuban-Haitian Entrant

The worker shall identify, in HE+ System Notes, the document witnessed which verified the individual's lawful status in the United States. If the individual has an immigration status or verification document that is not identified above, the worker shall contact the HE+ Help Desk for guidance. Eligibility as an eligible non-citizen must be documented annually on each application to ensure the applicant's immigration status is current.

#### 2.2.3 Social Security Number (SSN)

An SSN is required for the case head and all persons in the household who have been issued a valid number by the Social Security Administration (SSA). A person who does not have an SSN, and is eligible to apply for one, must do so with the SSA. See the following sections for SSN exceptions.

WHEAP agencies shall assist applicants to apply for an SSN. The website for the SSN application form and instructions for applying for a new SSN can be found at: <a href="http://www.ssa.gov/online/forms.html">http://www.ssa.gov/online/forms.html</a>.

WHEAP benefits will not be paid if, within thirty (30) days from the date of application, the case head has not supplied SSNs for all eligible household members. A denial letter stating that all information was not provided will be generated after 30 days. The entire household is ineligible for HE+ benefits if any eligible member fails or refuses to provide or verify his/her SSN or does not provide proof of application for an SSN.

When an applicant cannot provide the SSN for a household member(s), the household member(s) shall not be entered into the HE+ System until the SSN has been provided. The application will be incomplete until the SSN has been provided and verified. See Section 3.4.29 for more guidance.

In the event of an emergency situation, please see Crisis Chapter 4, Section 4.2.2, or the HE+ Furnace Program Manual located on the Division website.



#### 2.2.3.1 SSN Verification

SSNs must be verified through the HE+ System. When entering an HE+ Application, the HE+ System will prompt a web call to verify each SSN listed on the application. Agencies shall notify each applicant that all SSNs will be verified with SSA. There is a disclaimer on the paper HE+ Application which serves as notification when the intake method is non-interactive. There is a disclaimer on the electronic HE+ System application that shall be read to each applicant when the intake method is interactive.

The HE+ System will check the SSN against the Master Customer Index (MCI) database administered through the State of Wisconsin Department of Health Services. The MCI database contains verified demographic information obtained by several other state programs. If the SSN(s) can be verified with MCI, the HE+ System will indicate that the SSN(s) has been verified and the worker can proceed with the application.

In the event the SSN(s) cannot be verified with MCI, the HE+ System will automatically send the SSN(s) to the SSA for verification. Verification with SSA will take approximately three business days. The worker should complete all other sections of the application and submit for benefits. The application will automatically be sent to the worker's "SSN Sent to SSA" inbox.

The "SSN Sent to SSA" inbox will contain any SSN(s) not found in MCI and needing to be verified with SSA. This requires no user interaction but is an informational inbox for application management purposes. Any application containing an SSN(s) waiting for verification from SSA will remain in this mailbox until SSA has processed the submitted SSN(s), which takes approximately three business days. If the SSN(s) are verified by SSA, the HE+ System will automatically release the SSN(s) allowing the application to extract. If the SSN(s) are not verified by SSA, the SSN(s) will move to the "SSN Rejected by SSA" inbox.

The Division will monitor SSN verifications and any abuse of the verification system by WHEAP agency staff may result in termination of HE+ System access.

#### 2.2.3.2 Rejected SSNs

The "SSN Denied by SSA" inbox is populated when any SSN(s) sent to SSA are returned as invalid. This inbox <u>does</u> require user action. The worker must contact the applicant and check if the number and associated information was entered correctly. The worker should identify any discrepancies and update the information in the HE+ System and may have to refer the applicant to the local SSA office for further follow-up. If the new information does not match the MCI database, the HE+ System will again automatically send the information to SSA for verification; the application will move back to the "SSN Sent to SSA" inbox. In rare circumstances, an SSN override may be needed. Workers shall check the "SSN Denied by SSA" mailbox on a regular basis to ensure all applications with a rejected SSN are being addressed in a timely manner.

NOTE: Do not disclose any information returned from MCI or SSA to the applicant. Only ask the questions to determine whether or not the information originally entered is correct.

In circumstances where the application is submitted and is waiting in the "SSN Denied by SSA" inbox beyond 30 days, the HE+ System will automatically allow for a fourteen (14) day extension



for purposes of SSN verification only. All other elements of the application must be complete, and the application must be in "Submitted" status in order for the application to not be denied as incomplete. An application will be prevented from denying as incomplete if it is waiting in the "SSN Sent to SSA" inbox, provided that all other aspects of the application are complete, and it is submitted.

#### 2.2.3.3 SSN Exceptions

If the household member meets one of the following exceptions for not having an SSN, indicate the reason there is no SSN on the household member record and include the proper documentation in HE+ System Notes.

#### 2.2.3.3.1 Infants

Infants (newborns) less than 60 days old where an SSN has not yet been issued may be processed without a valid SSN if the applicant has applied for an SSN for the infant.

#### 2.2.3.3.2 Religiously Exempt from Social Security

Applicants who are exempt from being assigned SSNs due to a religious conviction must provide the Individual Taxpayer Identification Number (ITIN) assigned by the Internal Revenue Service (IRS). Do not enter the ITIN into the HE+ System as the SSN. An HE+ System Note, including the ITIN, must be added to the HE+ System.

#### 2.2.3.3.3 Ineligible Non-citizens

Ineligible non-citizens without an SSN shall not be listed as a case head. IRS-assigned Individual Taxpayer Identification Numbers (ITINs) should never be entered in the HE+ System as SSNs for ineligible non-citizens. See Section 2.2.2.4.

#### 2.2.3.3.4 Household Members Over 60 Days Old

Division approval must be obtained to proceed with any U.S. citizen over 60 days old if an SSN has not yet been issued or there are extenuating circumstances where the SSN cannot be verified. There must be a valid reason for the delay in obtaining an SSN and proof that an SSN was applied for. Documentation provided regarding the SSN application shall be uploaded to the application as "Other WHEAP Documents". The Division will approve an exception on a one-time basis. The situation must be fully documented in the HE+ System Notes. A valid SSN will be required on the next application. The Division will add notes regarding the SSN Exception request, showing the approval or denial. The household member should not be added to the application until the Division notes have been added, approving the one-time exception.

#### 2.2.3.4 SSN Overrides

The SSN Override function in the HE+ System may only be used in extenuating circumstances. Any SSN override request must include a System Household Member Note with the reason for the override request. To help the Division assess the override request, include what was done to verify the information entered, and if applicable, any important details for possible reasons the SSN was rejected. The Division must approve these overrides and will consider each on a case-by-case basis. Division staff may contact the worker via System Household Member Notes for more



information pertaining to the override request.

#### 2.2.3.5 Change SSN Request

Simple Change SSN: In the event that a case head or any household member in the HE+ System has an SSN entered in the HE+ System that is later found to have been incorrectly entered, a Change SSN request must be completed. A Change SSN request can be made via the change SSN function found on the action ribbon when viewing Person Summary details from the Person ID (PID) containing the incorrect SSN record. This request will be sent to the Division through the HE+ System to complete the change SSN request. This will move or merge the records from the incorrect SSN to the correct SSN.

If an incorrect SSN has been entered for a case head on an unextracted application, the unextracted application must be deleted and entered using the correct SSN/PID. If there is application history under the incorrect PID for the person with the incorrect SSN, then a "Request Change SSN" should be requested before the application is entered into the HE+ System. Once the SSN has been corrected, the application should be entered under the correct SSN. An HE+ System Note should be added that the application was first entered with the wrong SSN. This System Note should include the PID under which the application was originally entered.

Complex Change SSN: For other cases where only select records from a history need to be transferred to a different SSN/PID record or SSNs have been transposed between household members, please contact the HE+ Help Desk for assistance in completing these requests.

#### 2.2.4 Student Status and WHEAP Eligibility

If the case head is age 25 or older on the date of the application, the case head's student status does not need to be verified.

Student status must be determined for case heads enrolled in institutions of higher education when the case head is under age 25. A case head enrolled in school halftime or more will be <u>eligible</u> for an energy assistance benefit <u>only</u> if WHEAP financial criteria, WHEAP non-financial criteria, <u>and</u> at least one of the following WHEAP student status criteria is met:

- 1. The case head is physically or mentally disabled (disability must be verified, i.e., Veterans or Social Security Disability benefits), and the verification of disability is entered in HE+ System Notes; or
- 2. The case head is receiving W-2/**TANF** cash benefits; or
- 3. The case head or their spouse (if married) is financially responsible for a child 18 years old or younger who is living in the same household; or
- 4. The case head lives with a spouse who is not a student; or
- 5. The case head currently works an average of 20 or more hours per week for at least minimum wage; or
- 6. The case head is a full-time student receiving extended Unemployment Compensation Benefits under the Trade Adjustment Assistance (TAA), sometimes referred to under the North American Free Trade Act (NAFTA), provisions designed to enable the case head to be a full-time student. The TAA benefit award is limited to one year.



WHEAP case heads under 25 years old are considered students if they are enrolled, on a half-time to full-time status, in an institution of higher education that requires a high school diploma or an equivalency certificate (i.e., universities, colleges, technical, trade, vocational schools, and schools for the physical or mentally disabled). Determination of a student's status as a full-time, half-time, or part-time student is based on the institution's assessment/policy. Questions about status that cannot be resolved with the institution should be addressed to the HE+ Help Desk.

Student status expires at midnight on the on the last day of the applicant's final semester as per the institution of higher education's established semester end date.

NOTE: A minor case head is not considered a student because they are not in post-secondary education.

#### 2.2.4.1 In Between Enrollments

Individuals who have graduated from high school and have not yet enrolled in post-secondary education are treated as adult members of a household (unless they are under 18 years of age) until they begin their education. This may affect a few **early applications**, taken in August or September, as the individual's status is determined on the date of the application. It may also affect individuals who have had non-traditional high school graduation dates. If there is such an individual in the household, count the income of the adult (age 18 and older) for the month prior to the date of the application.

#### 2.2.4.2 High School Enrollees

A high school student may be considered a case head only if over 18, or if they are an emancipated minor (see Section 2.2.1). If the student is enrolled in a regular high school program leading to a diploma, the student status is not considered in determining eligibility. If the student is enrolled in a program leading to a General Education Diploma (GED) at a technical school or other institution, that program does not qualify as post-secondary education and may not be used to qualify an applicant for student status.

#### 2.2.5 Energy Burden

To be eligible for energy assistance, the household must have a heat/electric burden on the date of the application. Table 2.2: Energy Burden (see Section <u>2.2.5.2</u>), provides examples of situations and determinations of energy burden.

In addition to having an **electric burden**, there must be a relationship with a utility participating in the State Public Benefits program for an applicant to be eligible for non-heating electric assistance (Public Benefits).

Responsibility for energy, heat and/or electricity, in the household can be demonstrated in a number of ways including, but not limited to:

- 1. Having an account with the energy supplier and directly paying the bills,
- 2. Having the cost of the energy (heat and/or electricity) included in the rent,



- Making separate payments to the landlord for the energy supplied (heat and/or electricity), or
- 4. Gathering or cutting wood used for heating, or purchasing wood from a non-registered supplier.

When the account is not current because the vendor has closed the account (for lack of payment or other reasons), the relationship between the vendor and the applicant needs to be examined.

- If the applicant has not moved and a different vendor will not be serving the household, the agency should work with the vendor and the applicant to get an account re-established.
- If the applicant has moved, or has identified a new vendor to provide service, the agency should work with the new vendor and the applicant to get an active account established.

#### 2.2.5.1 No Energy Burden Households

The following do not satisfy the energy burden requirement:

- 1. Applicants who have no responsibility for heating/non-heating electric because the costs are being paid in full directly to the **fuel supplier** (or landlord, if heat/electric is included in rent) by a government program.
- 2. Applicants residing in government-assisted housing (**subsidized housing**) or receiving rental assistance and heat and/or electric is included in their rent.
  - NOTE: Residents of housing units receiving **Low Income Housing Tax Credit (LIHTC)**, also known as "Section 42", with heat and/or electric included in their rent <u>do</u> have an energy burden as they are not considered residents of government-assisted housing.
- 3. **Renters** who pay neither rent nor heating/electric costs because of an in-kind rental agreement. Renters who do not pay toward heating/electric costs when there is a shared meter and they do not pay any energy costs to anyone.
- 4. Tenants of group homes where the costs of care are paid by a local, state, or federal agency or charitable organization. This includes, but is not limited to, halfway houses or CBRFs.
- 5. Residents of medical or correctional institutions including nursing homes, assisted living facilities, government institutions, or jail when the applicant is not responsible for paying their heat and/or electric costs.
- 6. Tenants of facilities that pay a portion of their maintenance or care have no energy burden unless they pay their food and shelter costs.
- 7. WHEAP funds may not be used to offset or reimburse General Relief (GR) payments for energy cost. A GR recipient is considered to have an energy burden when GR makes a:
  - a. Flat cash payment to the recipient; or
  - b. Partial payment by voucher for heat and shelter; or
  - c. Received full payment of energy costs by GR but have since reimbursed the GR agency for the full payment. If the reimbursement occurs after a denial of the original application, the applicant may reapply and must complete a new application.



## 2.2.5.2 Energy Burden Table

The following table presents a variety of examples of energy burden questions and indicates (middle column) if the example satisfies the energy burden requirement. The final column indicates the method by which payment will be made, if appropriate.

Table 2.2 Energy Burden

Applicant Heat/Electric Situation	Have An Energy Burden	Type Of Payment
Pay an electric/heating vendor directly for use.	Yes	Designated vendor <u>will</u> receive a payment.
Heat/electric is included in rent. This includes tenants in Section 42 (LIHTC) housing units.	Yes	Applicant <u>will</u> receive a single party check based on a proxy amount for the heat/electric costs.
Heat/electric is paid to the landlord or trailer park owner.	Yes	Applicant <u>will</u> receive a single party check based on a proxy amount for the heat/electric costs.
Applicant gets electricity through an extension cord from a neighboring residence (from a house to a mobile home for example).	No	Applicant is not eligible for an electric benefit and <i>will not</i> receive a payment for electricity.
Applicant has a separate meter/account for his or her residence - someone else pays the bill.	Yes	Designated vendor <u>will</u> receive a payment that may be based on actual fuel costs for the residence.
Applicant has the account name listed in a non-household member's name.	Yes	Designated vendor <u>will</u> receive a payment that may be based on actual fuel costs for the residence.  If the account name is under a deceased spouse, protective payee, or other and is a direct pay account, actual energy costs may be used.
Applicant rents. Heat/electric are not included in rent. Account is in the landlord's name. Tenant directly pays energy provider.	Yes	Designated vendor <u>will</u> receive a payment that can be based on actual fuel costs for the residence.
Applicant has a shared meter/account with another residence, does not have heat/electric included in their rent, nor do they pay any heat/electric costs to anyone.	No	Applicant is not eligible for a benefit and <u>will</u> <u>not</u> receive a payment.
Applicant lives in a residence with a master meter for heat/electric and the account is in the applicant's name.	Yes	Applicant has a relationship with a vendor; designated vendor <u>will</u> receive a payment based on a proxy amount for the master metered fuel(s).



Applicant Heat/Electric Situation	Have An Energy Burden	Type Of Payment
Agricultural, business, or industrial activities on the same meter/account as the applicant's residence.	Yes	Designated vendor <u>will</u> receive a payment based on a proxy amount for the heat/electric cost.
Applicant has a shared meter/account with another tenant, and applicant pays the other tenant an amount for the heat/electric bill.	Yes	Applicant <u>will</u> receive a single party check based on a proxy amount for the heat/electrical costs.
Applicant heats with wood, the wood supplier is not a registered vendor, or applicant cuts his or her own wood.	Yes	Applicant <u>will</u> receive a single party check for heat benefit based on a proxy amount for the heat costs.
Applicant receives rental assistance (Section 8 or other similar government-assisted housing) and heat/electric is included in their rent. Section 42 (LIHTC) housing units are not considered government-assisted housing.	No	Applicant is not eligible for a benefit and <u>will</u> <u>not</u> receive a payment.
Applicant rents a single room in a dwelling and shares common living areas such as a kitchen, living room, or bathroom with other residents.	No	Applicant is not eligible for a benefit on their own as they share an energy burden with other residents of the dwelling. Applicant and the other residents may apply as an economic unit.

#### 2.2.6 Counting Household Members

Enter all persons living in the household on the date of the application unless specifically excluded (see Section 2.2.6.4). All persons in the **economic unit** are considered members of the household if they are living in the household on the date of application. Household members who are temporarily out of the household on the date of the application for reasons such as a vacation or business trip are still considered part of the economic unit and are counted on the HE+ Application. In addition, those working out of town but not maintaining a separate permanent residence are also considered part of the economic unit. A lease may, or may not, list all those satisfying the WHEAP definition of a counted household member.

If the household composition changed during the prior month test period, consider only the persons living in the household on the date of application. Do not count persons who may have lived in the household during a portion of the test period but are no longer in the household on the application date. If the household member resides in more than one residence, the local WHEAP agency must indicate in HE+ System Notes on what basis they determined the primary residence.

#### 2.2.6.1 Counting Children

Enter children as members of the household where they reside.

In custody cases where a child(ren) lives in more than one location based on shared physical placement, count the child(ren) in the household where they reside more than 50% of the year. If the applicant states that the child(ren) are part of a true 50%/50% physical placement situation, the



child(ren) can be recorded on the application of both parties. If a minor has unearned income, the unearned income shall be counted in the household where the income is being received.

The worker shall indicate in HE+ System Notes what the applicant stated about the child(ren)'s current living situation and how to include or exclude the child(ren) as a current household member was determined.

To verify the current living situation of a child(ren), consider any of the following information: court order(s), information from Income Maintenance cases or other economic support records, school registration records or contact information. Please contact the HE+ Help Desk if assistance is needed in determining if the child(ren) should or should not be included.

NOTE: 50% legal custody is not the same as 50% physical placement. The parent must have at least 50% physical placement in order to include the child(ren) on the application as an eligible household member.

#### 2.2.6.2 Non-citizen Household Members

- 1. Enter eligible non-citizens as household members. See Section 2.2.2.4.
- 2. Enter ineligible non-citizens as household members and indicate their status as ineligible non-citizen. All policy related to counting income applies to ineligible non-citizens. Count all applicable income for ineligible non-citizen household members.

#### 2.2.6.3 Medical Attendants or Caregivers for Individuals with a Disability

A medical attendant or caregiver is a person who cares for a household member to allow the household member to remain in their home, instead of a nursing home or institution. A caregiver is not counted as a household member if they maintain a separate household as their primary residence and do not live with the household member or share in providing or being provided for the necessities of life. The necessities of life are shelter, heat, and utilities.

If the medical attendant or caregiver lives in the household and it is their primary residence, then they are counted as a household member.

Even if the medical attendant is a household member, income they earn for their caregiving duties that allow an individual to remain in their home is not counted as income. See "Money received by a disabled person or paid to a medical aide or other caregiver specifically to allow the disabled individual to live in their own home" in Section  $\underline{2.3.9}$ . If the dwelling is an Adult Family Home, please see Section  $\underline{2.3.2}$ , 7. for more information.

If the medical attendant or caregiver is counted as a household member and has income from sources other than caregiving, that income shall be counted.

Table 2.3: Determining Caregiver Household Member Status and Counting Their Income

Caregiver Primary Residence	Caregiver is counted as a household member	Caregiving income is counted	Caregiver's income from other sources is counted
Caregiver lives with the WHEAP	Yes	No	Yes



customer and it is their primary residence			
Caregiver has their own primary residence	No	No	No

#### 2.2.6.4 Household Members Not Included on Application

The following is a list of the persons who should *NOT* be included as household members:

- 1. A **temporary household member**. Do not count the person or his/her income.
- 2. A foreign exchange student from another country attending school on an exchange program.
- 3. College students, unless they live in the home full-time and are commuting to school. If the student has any living facilities other than the home they may not be counted in the household—for example: have a dorm room, rent a room or an apartment. Individuals who have started their post-secondary education may not be counted as household members during semester breaks, or over the summer (between terms), unless they are commuting students.
- 4. Foster children who are placed for care by a court order.
- 5. A household member who has been called to active duty in the military and is to be out of the household for at least 60 days. The base income of this individual should not be counted. Any household support provided to maintain the household (i.e., housing allowances, allotments sent directly to the household for support) is counted as income for the household.

## 2.3 Financial Eligibility

#### 2.3.1 General

The WHEAP income test is based on sixty percent (60%) of the state median income (SMI) level. If the household's gross income is less than or equal to the income limit for its size, the household passes the income test. If the gross income exceeds the limit, the household is not eligible unless categorical eligibility criteria are met. The income guidelines for different household sizes can be found on the Division website.

#### 1. Assets

The HE+ Program does not have a vehicle or asset limit test for eligibility. While Regular Benefits lack an asset test, assets may be considered in deciding Crisis Assistance benefits or furnace services, including assets of landlord.

The proceeds of the sale of an asset are generally not counted as income. If the sale proceeds:

- a. Include capital gains realized from the asset, the capital gains are not counted as income.
- b. Involve a series of payments, any interest included in the payments needs to be counted as income. One common example is a land contract sale of real estate—the land contract should contain a description of the payments showing the principal and interest amounts (often this is in a chart or table).



#### 2. Categorical Eligibility

Categorical eligibility status allows a household to pass the income test if they are above the 60% SMI level. For a household to be determined as categorically eligible every household member must be a recipient of W-2/TANF, FoodShare, or Supplemental Security Income (SSI) for the month prior to the date of application. W-2 is considered a categorical eligibility criterion only if there is a "cash benefit."

- a. W-2/TANF is Wisconsin Works/Temporary Assistance for Needy Families. If the household is over income for WHEAP but is determined to be categorically eligible because the household is receiving W-2, the agency must verify that all household members are a part of the Assistance Group and document, in HE+ System Notes, how this was verified.
- b. FoodShare (FS) is also known as Food Stamps. If the household is over income for WHEAP but is determined to be categorically eligible because the household is receiving FoodShare, the agency must verify that all household members were receiving FoodShare in the month prior to the date of application and document in HE+ System Notes how this was verified. System Notes should specifically indicate which household members and months FoodShare was received.
- c. SSI is Social Security Supplemental Income. The SSI category includes the Care Taker Supplement Income (Care Taker Supplement is abbreviated as CTS or C-Sup).

NOTE: Receipt of Social Security Retirement benefits or Social Security Disability Insurance (SSDI) cannot be used to establish categorical eligibility.

If some, not all, of the household members (including ineligible non-citizens) are recipients of W-2/TANF, FoodShare, or SSI for the prior month test period, the household is <u>not</u> categorically eligible.

If the household member(s) is a recipient of W-2/TANF, FoodShare, or SSI and does not have a first-of-the-month effective date for receiving program benefits but does have a partial month, consider him/her to have been a recipient of the program for that entire month. For example: The applicant applies for WHEAP on October 1. S/he received W-2/TANF cash benefits starting September 15. Consider him/her to have been a recipient for all of September.

#### 2.3.2 Counting Income

Determine the income amounts, consistent with the test period and the type of income.

#### 1. Test Period

The test period is the time frame during which income is counted to determine eligibility. The time frame varies by income type. For most individuals with an income source, the test period is based on gross income received during the prior month. The test period may also be based on gross income received during the previous tax year. WHEAP agencies may accept a W-2 form issued by the employer as verification. Agencies shall review the applicant's income and work history to determine if a W-2 is the best option to use to verify



household income. If a W-2 is used, apply the amount reported in Box 5, dividing by 12 and enter for the prior month test period.

The test period can also be based on gross income received during the 12 months prior to the date of the application, or the previous tax year for income types such as interest, dividends, annuity, tribal per capita payments, seasonal worker income, and self-generated income.

If the household's prior month income exceeds the WHEAP eligibility limit and the household's financial circumstances have recently changed (due to divorce, loss of a job, accident, etc.), agencies may use the present month as the income test period. The prior month income shall be documented with an HE+ System Note and with verification documents uploaded to the application. If the test period is the present month, agencies shall estimate the income based on information provided by the household using the Present Month Income Attestation Form.

A prior month test period that contains an extra paycheck or overtime hours that are not available in the current month does not constitute a change in the household's financial circumstances. If a household is over-income due to an extra paycheck or overtime pay received in the prior month test period and there has not been a change in the household's financial circumstances, annualizing the household's income from the previous tax year should be considered.

#### 2. General Guideline

Count all gross income received by all household members on the date of application for the appropriate test period. For self-generated income and seasonal wages, see the specific directions in the following sections.

Do not count, or enter, earned income or unemployment compensation for minors under the age of 18 (or full-time high school students) at the time of the application. If a minor has unearned income (SS, SSDI, SSI), the unearned income shall be counted in the household where the income is being received.

#### 3. Interest and Dividends

Count interest and dividends as gross amounts received/earned in the 12 months prior to application, or during the previous tax year. Interest payments from land contract sales are recorded as land contract payments and can be recorded monthly if the amortization (payments) schedule is available (if an amortization schedule is not available it may be necessary to use amounts based on prior year's taxes).

Ignore this income only if the interest and dividends combined is less than \$120 per year (\$10/month). Ignore interest and dividends if the household member does not have access to the funds, such as interest on IRAs and CDs. To the extent it can be identified, ignore the interest from asset account for applicants with a **PASS** plan (SSI\_Plan for Achieving Self Support). Do not ignore tribal per capita amounts.



Count the full 12 months and enter the monthly average amount for the prior month test period. Interest and dividends should be added together as one entry per household member. Document in the source field or in a System Note each source of the interest and dividends reported.

For verification, do not accept statements that show only the interest earned for the prior month test period. The 1099 form issued by the payer or Schedule B of the 1040 tax return are acceptable forms of verification.

Interest income is reported on line 2a and 2b of the 1040 tax return. The amounts on line 2a (tax exempt interest) and 2b (taxable interest) should be added together to calculate the interest income.

Dividend income is separated as Qualified Dividends on line 3a and Ordinary Dividends on line 3b of the 1040 tax return. Use line 3b (Ordinary Dividends) only as this represents the total dividends reported which includes the Qualified Dividends.

- 4. Disability Long Term Offset When receiving both Social Security Disability and a Long Term Disability Insurance payment, the Long Term Disability may be reduced by the amount of the original Social Security Disability payment. Count the net disability calculation showing on the Coordination of Benefits (COB) statement issued. The Social Security Disability payment received will be entered as a separate income line.
- 5. Some residents of buildings with income-based requirements for occupancy live in a building where their energy costs (both heat and electric) are included in their rent. Such residents are not eligible for WHEAP benefits because they have no energy burden. Applications can be taken from the tenants of such buildings to determine eligibility for Weatherization. The local WHEAP agency will follow processes below in determining eligibility:
  - Collect copies of waivers signed by the tenants allowing the property manager (landlord, housing authority) to release income information to the local WHEAP agency.
  - b. Collect household information (SSN for each resident in the household, number of rooms, income, and any other information needed to complete the HE+ Application) from the property manager.
  - c. Obtain from the property manager an assurance that the case head for each application is who they say they are.
  - d. Check the box on the fuel question indicating, "Do not pay...."
  - e. Signed and dated Certification Page by each applicant/resident.

#### Deductions from Income

Allow no deductions from gross income for employment-related expenses, childcare, medical expenses, or for any other reason. Allow no deductions from gross income except as specifically identified in this chapter, or as part of the Income Deducted Table (Section 2.3.8).

Garnishments removed from income are not an allowable deduction from income. Care must be taken to ensure the income counted is the total gross income amount for each pay



period.

- 7. Managed care cases residing in an owner occupied AFH (Adult Family Home) residents living in an owner-occupied AFH are considered part of the economic unit. They should be listed as household members and the income they receive shall be recorded as part of the household income. Money paid to the caregiver as their "rent" should be ignored income. Money paid to the caregiver as part of their general care should be counted as wage income for the caregiver. Because these residents are part of the economic unit, this income shall not be calculated as self-employment income. Contact the HE+ Help Desk if there are questions on managed care income.
- 8. Pensions, Annuities, and Deferred Compensation (IRA, 401K, 503b, etc.)
  Pensions, Annuities and Deferred Compensation are intended to provide income during retirement. They are different sources with different rules regarding when and how they are paid out. At any point that money is received from these sources as income, they are counted income. Situations in which withdrawals are made from any of these accounts ahead of retirement will determine if this income is considered counted income or considered ignored income. The point at which an IRA or Annuity is annualized or at the time the holder is required to make withdrawals, it is counted as income.

Reminder: An amount equal to the standard Medicare Part B deduction should be subtracted from the gross amount of Social Security retirement benefits. In addition to subtracting this deduction from Social Security retirement, this deduction should also be applied to those receiving federal pensions and Railroad Retirement who are not eligible for Medicare benefits because of these prior employments. No other medical deductions are allowed. See Section 2.3.9 under Medicare.

- a. Pensions are payments earned from employment and are usually paid on a monthly basis. Gross income should be counted. Some pensions can include deductions for various purposes and benefits can fluctuate from year to year. Retired Military Compensation should be recorded as Veterans benefits.
- b. Annuities that are paying out regular payments should be counted as income. If paid monthly, include this income in the test period. If payments are received quarterly or annually, annualize the income and divide by 12 to calculate the monthly income amount for the test period.
- c. Deferred Compensation is a retirement savings account. At the point the individual is receiving regular payments, they are counted as income. If payments are received monthly, count the monthly income for the test period. If received quarterly or annually, annualize the income and divide by 12 to calculate the monthly income amount for the test period.
- d. Pension, Annuities, and Deferred Compensation payments are scheduled and paid on a regular basis. For pension or annuities paid on a monthly basis, enter the monthly gross benefit. For those paid on a quarterly and/or other basis, enter the average monthly amount. Often 1099 forms can be used for verification.
- e. Payments from trust funds that make regular payments to the beneficiary are counted as income. Trust fund income will be reported on K-1 and Schedule E Part III. Monthly verification is acceptable.



- f. Military retiree, survivor or beneficiary compensation, and VA Disability Compensation should be recorded as Veterans Benefits
- g. For withdrawals:
  - i. If the account owner is <u>70 or older</u>, count <u>all</u> withdrawals from the account as income. Withdrawals are annualized by calculating all withdrawals within the year and dividing by 12 to arrive at a monthly income amount.
  - ii. If the account owner is <u>under 70 years of age</u>, count as income all withdrawals from an account that are recurring and regular. Annual withdrawals taken once each year are considered recurring income and should be counted and divided by 12 to arrive at a monthly income amount. Withdrawals that are not regular and not required may be a reduction of assets, and not included as income for an account holder under the age of 70
  - iii. Withdrawals from Pension/Annuity/IRAs that are identified as counted income are calculated on a 12-month time period by adding all withdrawals together and dividing by 12 to arrive at a monthly income amount. Tax information from the last calendar year is usually provided as 1099s to provide complete verification of the 12-month time period. The prior 12 months of activity could be used to calculate the annual income if the customer can provide income verification from that time period.

#### 2.3.3 Child Support

- 1. Received in the Household
  - a. Count all child support payments received, regardless of source
    - Count the actual money received even if it exceeds any court ordered amount or comes from other programs or parties than the non-custodial parent. Exception: See lump sum payment.
    - ii. Count the child support payments as income even if the child is not actually living in the house at the time of the application.
    - iii. Regular, recurring payments received that are for the purpose of paying down arrears are counted as income.
  - b. If a lump sum payment is made for arrears, including tax intercept income, only count the amount of the payment that applies to the test period.
- 2. Payments made by the Household
  - a. Court ordered child support payments paid by a household member/applicant are deducted from total household income.

Regular, recurring payments paid to pay down arrears are deducted from income.

Payments made by a household member/applicant for child support that are not part of a court order shall be ignored and may not be deducted from income. Payments for alimony or maintenance may not be deducted from income.

Payments, even if court ordered, intended to pay for outstanding bills (medical or otherwise, legal



costs, or other non-custodial expenses) may not be ignored or deducted from income.

If a lump sum payment is made for arrears, including by tax intercept, only deduct the amount of the payment that applies to the test period. The worker must verify whether any part of the lump sum payment applied to the test period.

- 3. Child Support for Non-Resident Child
  - a. If a household receives child support payments, but the child actually resides more than fifty percent (50%) of the time in some other household, do not count the child as a household member, but count money received (regardless of what the household does with the child support funds).

## 2.3.4 Spousal Impoverishment

A spouse who is in a nursing home (institutionalized spouse) for more than 30 days may allocate some or all of their income to their spouse (community spouse). The Spousal Impoverishment provision ensures that the community spouse has income to meet household expenses. Money not allocated to the community spouse must be used to pay nursing home costs and is not available to the community spouse. Count the income received as a result of Spousal Impoverishment income allocation provisions of Wis. Admin. Code HSSS §103.07(1)(9B)2 as direct income for the community spouse. Do not count the personal needs allocation that the institutionalized spouse is entitled to receive (typically a minimum of \$45).

## 2.3.5 Self-Generated Income

**Self-generated income** (including self-employment and farm income) is determined by using a 12-month test period and entering an averaged, annualized amount for the prior month test period. If the business ended during the same calendar year and prior to the test period, this self-generated income is not entered on the application. Other types of income for the individual or household are entered separately on the application and do not affect the self-generated income entries in the HE+ System.

When a household has more than one type of self-generated income, the losses of one shall be used to offset the profits of the other based only on the income reported on the income taxes. The offset does not have to be applied to only the same household member but can be applied to other household member's self-employment income. For purposes of calculating income on the HE+ Application, Rental and Royalty Income (entered in the HE+ System using "Rental Income" (R) income type) shall be included in the offset of losses and profits of self-generated income. When there is a realized loss in self-generated income, enter self-generated income as a separate income source and \$0 as the amount for that source on the HE+ Application.

Self-generated income losses may not be offset by wages, interest income, or government program benefits or self-generated income reported on the Self-Generated Income Report Form (S-GIRF). Alternatively, income from wages, interest, or government benefits may not be reduced by self-generated income losses.

NOTE: For the purposes of calculating income, ownership and management of rental and royalty property (Schedule E) is self-generated income and this income is entered in the HE+ System as "Rental Income."



#### 2.3.5.1 Verification of Income - Self-Generated Income

The worker shall ask all applicants with self-generated income in the household whether taxes were filed for the prior calendar year. If taxes were filed, the tax return must be provided by the applicant. Request the federal 1040 form and all appropriate schedules. If possible, use a copy prepared by a professional tax accountant.

The most common IRS 1040 Forms that report self-generated income are Schedule C (Business), Schedule F (Farm) and Schedule E (Rental, Partnerships, and Subchapter S corporations). Each member of a Partnership is also issued a Schedule K-1.

Use the self-generated income amount reported on the IRS 1040 tax forms for the prior year. Compare the amounts on the appropriate schedule with the entry on the corresponding line on the 1040 form, usually these are lines 3, 5, and 6 from Schedule 1. (If there is an amount listed on line 7a of the 1040 indicating income from Schedule 1, line 22, then Schedule 1 must be reviewed as this is where the self-generated income is reported). No adjustments are required. Divide the total net annual (12 months) income from the appropriate schedule by 12 to obtain the average monthly income amount. Income should only be entered for the months of the test period if the business was still in operation during that time.

For Partnerships, use page 2 of the Schedule E and the partner's K-1 to determine the individual's income to count for the partnership.

- For each business on the Schedule E, calculate the net amount by adding and subtracting the totals from the Passive Income and Loss and Nonpassive Income and Loss. (If there is only one Partnership/S-Corporation on the Schedule E, this total net will be on line 32 of the Schedule E).
- Take the net value and subtract any Guaranteed Payments (line 4 on the schedule K-1). If the net value is a loss, increase the loss by adding the Guaranteed Payments to calculate the total loss.
- Take this amount and divide by 12 (or the appropriate number of months, see below) and enter the annualized amount for the month of the test period using the self-generated income (SE) income type.
- Review each partner's K-1 to determine if they received a guaranteed payment. If there were guaranteed payments on the K-1, this is considered wage income and should be added as a separate income type using the Wages (W) income type and indicate in the "Income Source" line that these wages are from guaranteed payments from a partnership. Guaranteed payments should be annualized by dividing the total guaranteed payments by 12 (or the number of months business was in operation) and entered for the month of the test period. If there were no guaranteed payments listed on the K-1, document in HE+ System Notes that no guaranteed payments from the partnership were received for that partner.
- Wages earned by self-employed individuals who pay themselves, issuing a W-2 at the end
  of the year, shall be annualized and entered as Wages (W) income type in the HE+
  System, specifying in the "Income Source" line that this is wages from the self-employment
  business. Use the W-2 for a verification item, dividing by 12 (or the number of months of



operation) and enter for the month of the test period.

When the applicant does not file taxes or did not file self-employment on his/her taxes, instruct them to complete a Self-Generated Income Report Form (S-GIRF) as found on the Division website. See Section 2.3.5.2. A copy of the S-GIRF and/or tax records shall be retained in the HE+ System as a document upload in the verification field of the application. Exception: Rental income must be verified by tax records for furnace services. If rental income is not verified by income taxes for the homeowner or dwelling owner, the homeowner, including the rental unit, may not be eligible for a furnace referral. Please contact the HE+ Help Desk if the homeowner or dwelling owner does not file taxes.

When a business was not in operation for the entire previous year because it started business in that year, divide the net annual income from the appropriate schedule by the number of months of operation to get the average monthly income. For example, the business started July 1 of the previous year. Take the net annual income and divide by six (6). If a business operated for only a few months of the previous year, but was in existence for the whole year, divide the net annual income by 12 to get the average monthly income. Seasonal businesses would be an example of this situation.

When a business has ended during the current application calendar year, annualize the income from the tax verification provided. Self-generated income should only be counted if the business was still in operation during the test period. If it is determined the business was not in operation during the test period, there is no self-generated income to enter. Document in HE+ System Notes the business operation end date to verify the status of the self-employment income.

## 2.3.5.2 Use of Self-Generated Income Report Forms

A Self-Generated Income Report Form (S-GIRF) may be used to verify self-generated income when an applicant states that they did not file taxes in the most recent year or did not file self-employment on his/her taxes. In such a case, the S-GIRF must cover the previous 12 months to the date of application. Sum the total of the gross income provided on the S-GIRF and divide by 12 to calculate monthly income and enter that amount for the prior month test period. A separate S-GIRF shall be used and entered as a separate entry in the HE+ System for each source of self-generated income. Completed S-GIRF forms shall be retained with the application as a document upload in the HE+ System.

The Self-Generated Income Report Form can be found on the Division website via Provider Resources > Energy > Energy Assistance.

NOTE: No income deductions are allowed when reporting self-generated income on an S-GIRF. Deductions or expenses related to self-generated income shall not be factored into the amounts counted as income unless the applicant provided the complete tax return from the prior year.

The S-GIRF shall be used to report self-generated income if:

 Money is received for self-generated income without an organized self-employment business and/or self-employment is not filed on the applicant's taxes. Examples include odd jobs, childcare, cleaning, donating plasma, etc.



• The source of income, business or farm, was not in operation during the previous year and IRS tax forms are not available.

**Example**: The business or income started in June and the applicant is applying in November. The business operated for five months (June through October.) Divide total income by five (5) to arrive at the amount per month and enter that amount as self-generated income for the prior month test period.

**Example**: The business or income started in February and the applicant is applying in April. The business or odd job income operated for two months (February and March). Divide total income by two (2) to arrive at the monthly amount for March.

Chapter 7 bankruptcy has been filed since tax forms were last completed.

NOTE: The last day of work would be the day that the bankruptcy papers were filed. Do not use last year's tax form; use the S-GIRF to calculate income.

NOTE: A person who files bankruptcy under Chapter 11 of the federal bankruptcy laws and remains self-employed is not considered to have a significant change. Base income on last year's tax return and any approved bankruptcy reorganization plan.

#### 2.3.5.3 Self-Generated Income and Annual Fuel Use

When self-generated income is in, or based in, the home (or other areas on the property which have their usage recorded on one meter), the actual fuel cost should be entered but is not used to calculate the benefit. The applicant will receive a benefit based on a proxy amount for heat/electric costs when "Yes" is selected for business use on the account in the Energy Fuels section of the Application. See Section 3.4.31.11 for tests to determine if business use should be marked "Yes" on the account.

#### 2.3.5.4 Document Upload

Document upload includes all income types. Before an application can be submitted, the HE+ System requires document uploads for all income entries and a completed Zero Income Form (ZIF) for all zero income applications. Any documentation that an applicant submits must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason. Once an application is extracted, any additional document uploads for the application must be made via the "Other WHEAP Documents" upload repository.

Document uploads are completed and viewed in the HE+ System via the document upload slider, which is indicated by the paperclip icon on the left-hand side of the application view window.

If the form of income verification is obtained from a policy-allowed electronic third-party source a legible screen print from the third-party source is an allowable upload. Please see <u>Appendix B</u> for more guidance regarding allowable forms of income verification.

## Self-employment income:

All self-employment income verification must be retained as part of the application by conducting a



document upload for each of the following income types:

- Self-generated income (SE)
- Rental income (R)

A document upload is required on <u>each</u> SE income and/or R income record entered on the application.

- When tax documents are provided as income verification for self-employment, the federal 1040 form, the Schedule 1 (Form 1040), and all appropriate schedules as identified on Schedule 1, including the K-1 forms for partnerships, must be included in the upload. State returns and other federal forms not related to the self-employment income are not required.
- When the same tax document provides income verification for more than one line of selfemployment income, agencies may upload the same documents or only the related schedules for that income. The required 1040 AND Schedule 1 must be included in at least one of the document uploads.
- If it is discovered after the document is uploaded that a schedule is missing, the missing schedule can be uploaded as a separate file if the case has not been extracted.
- Multiple uploads can be attached to one income type.
- Redact the following information prior to scanning documents for upload:
  - o SSNs on all forms by crossing out all but the last four digits of the SSNs
  - Tax preparer ID
  - o Bank routing information

Naming the document: agency shall establish a naming mechanism that ensures that the workers can easily identify the correct document to upload to the application. Considerations to keep in mind:

- Identify the file with the customer and/or household member name or ID to ensure the correct file is uploaded to the associated application
- Identify the file with the identification of the type of income verification provided
- Avoid using the application number as part of the file name because the HE+ System adds the application number as the first part of the document name during the document upload

# Zero Income:

When the household is identified as a zero income household, the required Zero Income Form(s) (ZIFs) are to be uploaded to the application. When zero income forms are required, the form(s) are retained by document upload. If there are multiple adults on the application, a separate ZIF is required for each adult. Agencies may upload separate ZIFs or scan all ZIFs and upload as one document. A ZIF may not be required if ignored income has been verified through a third-party source. The verified income may be uploaded in lieu of the ZIF. Application notes should be clear why a ZIF was not completed.

## Naming the document:

• Identify the file with the case head and/or household member name to ensure the correct file is uploaded to the associated application



 Avoid using the application number as part of the file name because the HE+ System adds the application number as the first part of the document name during the document upload

## 2.3.6 Seasonal Workers' Income

Seasonal workers are individuals whose primary employment/source of income is normally earned in less than 12 months per year. Seasonal workers may be paid on a 12-month basis but earn their income in less than 12 months. Seasonal workers often include school bus drivers, teachers, and others whose primary employment is less than 12 months per year. If the seasonal employment has not been in effect for 12 months, calculate the seasonal income from the start date to the end of the prior month (of the application date) and divide by the number of months this covers.

If an individual is determined to be a seasonal worker, indicate in System Notes what information was used to make this determination.

Individuals who have regular (year-round) employment or source of monthly income and hold second jobs in seasonal businesses are not seasonal workers for the purpose of calculating income. An individual who holds a seasonal job but is not determined to be a seasonal worker because they have a regular source of income should have each income calculated per established income guidelines for each source.

A seasonal worker may have more than one job or source of income. If a household member's primary source of income is determined to be seasonal, all wage income must be calculated from the same annual time period and divided by 12 to get a monthly income amount. All other income types should be counted as per policy for that income type. Unemployment compensation is ignored income.

#### 2.3.7 Income Counted Table

The following table provides a list of counted income types including a description and the HE+ System code.

Table 2.4: Counted Income Types

Income Counted Types	(HE+ System Code)
Alimony Received	(A)
Child Support Received	(CS RECD)
See Section 2.3.3.	
SSI Caretaker Supplement	(C-Supp)
Disability Long Term	(DL)
Count gross receipts during the test period. If recurring payments are made annually, then divide by 12 and add the computed amounts to each month of the test period. When the Long Term Disability payer is offsetting the amount of disability benefit against the Social Security Disability payment, count the net calculation of the disability payment after the	



Income Counted Types	(HE+ System Code)
SS payment is calculated.	
Disability Short Term  Count the income in the months to which the payment(s) applied, regardless of when the payment(s) was received.	(DS)
Example: maternity leave	
Dividends/Interest	(D)
Count as income if the combined total is greater than or equal to \$120 in the 12 months prior to the application, or during the previous tax year, and the applicant or a household member has access to it (able to withdraw the money without penalty). Examples of interest which may not be accessible: IRAs, CDs, etc.	
If annual amount earned is less than \$120, ignore the income.	
NOTE: Do not accept statements that show only the interest earned for the prior month.	
See Section 2.3.2 for additional information.	
Gambling, Lottery, Bingo	(G)
Lottery winnings, Bingo, or any other income from gambling. Count gross winnings received in the prior month income period.	
General Relief	(GR)
Income from the State Relief Block Grant (e.g., Refugee Cash Assistance [RCA]). See also Section 2.3.9.	
Gift/Donations	(GF)
Something given voluntarily without expectation of payment in return, or to make a gesture of assistance. Count money received as a gift or donation in the prior month test period. Do not include gifts received for birthdays, holidays, or other special occasions.	
Government Relief or Disaster Aid	(GV)
Funding received from federal government assistance. This includes the match grant money/resettlement funds a refugee receives upon arrival in the U.S.	
NOTE: Refugee Cash Assistance (RCA) is reported as General Relief income.	
Land Contract	(LC)
Count only the interest portion of the payments as income.	
Land Rent Income from land used for, including but not limited to, cash crop fields or pastured livestock. Ignore annual amount earned up to \$120.	(R)
Lump Sum Payments Counted	(W)
Lump sum payments received from employers for compensatory time, unused sick leave,	-



Income Counted Types	(HE+ System Code)
and unused vacation time are counted and should be prorated over the number of months covered.	
Other  Use <u>only</u> when an income type does not exist and indicate in the Source Field the type of other income.	(O)
Other Direct Payments (Regular and Scheduled)  Regular and scheduled payments of any source of income (received monthly, quarterly, annually, or on any regular schedule) that is not classified as ignored income.	(W)
<ul> <li>Respite Care if received as salary</li> <li>Payments for shelter costs or normal living expenses (rent, clothing, food eaten at</li> </ul>	(W)
home)  Regular payments from a trust fund	(P)
Pensions, Annuities, and Deferred Compensation (IRA, 401k, 503b, etc.)  These payments are scheduled and paid on a regular basis. For pension or annuities paid on a monthly basis, enter the monthly gross benefit. For those paid on a quarterly and/or other basis, enter the average monthly amount.  See Section 2.3.2 for additional information.	(P)
Rental/Royalty Income  Enter income in the HE+ System using (R) income type; see Section 2.3.5 for more information on counting self-generated income.  NOTE: If Rental income is paid to other household members of the economic unit, the rental income received is ignored. This is ignored because it is considered a distribution of household expenses.	(R)
Self-Generated Income (Self-Employment) This includes farm income. See Section 2.3.5.	(SE)
Social Security (Retirement)  Benefits paid from the Social Security Old Age and Survivor's Insurance Trust Fund to retired workers, their spouses and children, and survivors of deceased workers. See also: Medicare Part B, Section 2.3.9. (If a lump sum retroactive payment is received, count only the amount of the payment that would have been received in the test period.)	(SS)
Social Security Disability Insurance  Benefits paid from the Social Security Disability Insurance Trust Fund to disabled workers and their spouses and children. See also: Medicare Part B, Section 2.3.9. (If a lump sum retroactive payment is received, count only the amount of the payment that would have been received in the test period.)	(SSDI)
Spousal Impoverishment See Section 2.3.4.	(SP)



Income Counted Types	(HE+ System Code)
Strike Benefits  Strike benefits are counted incomes. If the payment(s) includes an amount paid specifically for a period that does not include the prior month test period, that portion is ignored as income, except for seasonal workers.	( <b>W</b> )
NOTE: For seasonal workers see also Section 2.3.6.	
Student Income  Count all earned income, including wages from employment, work-study wages, and ROTC stipends. Other student stipends should be counted as other income.	(W)
Do not consider financial aid such as scholarships, education grants, fellowships, veterans' educational benefits (including educational subsistence allowances), ROTC scholarships, GI Bill, student loans, or book reimbursements as income for student(s).	(O)
Supplemental Security Income	
Income paid to the disabled, elderly, and blind. Enter the federal and state benefit as two separate SSI income lines. Do not count SSI-E income. Verify that state SSI benefits do not include SSI-E. See Section <u>2.3.9</u> - Ignored Income Table.	(SSI)
TANF/W-2 Count only cash grants received.	(T)
Training Allowances	
Vocational and rehabilitative program money recognized by federal, state, or local governments. Example:	
Wisconsin Employment Opportunities Program WEOP, or	
<ul> <li>Workforce Innovation and Opportunity Act (WIOA – formerly WIA).</li> </ul>	(W)
NOTE: Related reimbursements and payments made directly to service providers for childcare, tuition and fees may be ignored except for any amount in excess of actual expenses, which must be counted as income. See also Reimbursements in the Ignored Income Table, Section 2.3.9 of this chapter.	
Tribal Per Capita	
Tribal per capita gross amounts received in the 12 months prior to application, or during the previous tax year, less the first \$2,000 received by the applicant in the same 12 months or the same tax year, then divide by 12 to get the monthly amount. If the total gross amount is \$2,000 or less, treat the entire amount as ignored income.	(TR)
Unemployment Compensation	
Unemployment compensation is entered on the HE+ Application, but the HE+ System does not count it as part of the total income in determining WHEAP benefits. (If a lump sum retroactive payment is received, count only the amount of the payment that would have been received in the test period.)	(UC)
Veterans Benefits  Veterans' benefits are counted income. These may be identified by the VA as the	(V)



Income Counted Types	(HE+ System Code)
following:	
VA Compensation: for disability during war activity,	
<ul> <li>VA Pension (do not list as pension income): for disability that was acquired outside of war activity,</li> </ul>	
Retired Military Compensation: regular retirement, or	
Dependency and Indemnity Compensation (DIC).	
Wages, Salaries, Commissions, Bonuses, Profit Sharing and Tips	
Count all gross income received in the prior month test period (based on payment or check date) by all adults 18 and over living in the household (see Section 2.3.9 for exceptions).	
<ul> <li>Count commissions, bonuses, and profit sharing received annually (lump sums) i the year it was received. Take the total award divided by 12 and enter the computed annualized amount in the prior month test period.</li> </ul>	n (W)
<ul> <li>Seasonal workers: calculate earnings by dividing the person's gross income from W-2 statements or the 1099 by 12. Report the monthly income for the prior month test period.</li> </ul>	
Worker's Compensation	(IAUZ)
Worker's compensation payments are counted income.	(WK)
<b>Zero Income Cases</b> When households report zero income an in-person or phone application is required. See <u>3.4.27.2</u> for self-certification requirements of zero income households.	N/A

#### 2.3.8 Income Deducted Table

The following table provides a listing of the income deducted types including a definition/description.

# Table 2.5: Deducted Income Types

## **Income Deducted Types**

## **Child Support Paid**

Enter the child support paid in the test period and the HE+ System will subtract the child support paid from the income calculation. See Section 2.3.3.

#### **Medicare Part B Premiums**

- An amount equal to the Standard Medicare Part B premium shall be deducted when entering Social Security retirement income.
- Medical insurance premiums shall be deducted from the retirement pay of those receiving federal retirement or railroad retirement benefits, up to an amount equal to the standard Medicare Part B premium.



NOTE: Part D premiums are not deducted from income.

# 2.3.9 Ignored Income Table

The following table provides a listing of the income deducted types including a definition/description.

# Table 2.6: Ignored Income Types

## **Ignored Income Types**

#### **Adoption Assistance**

Social Security Act Title IV-E Fund. Provides monthly payment to adoptive parents to assist with the care of a special needs child. Count the child in the household.

#### **Assets**

- Any personal asset sold in the prior month test period; see Section 2.3.1 (1).
- Withdrawals from the principal of interest/dividend earning accounts as savings accounts, stocks, certificate of deposits (CD), U.S. Treasury Bonds, etc.
- Lump sum withdrawals from an IRA account before the account owner is 70 years old are not counted as income.
- Capital Gains

NOTE: All lump sums for someone under 70 years of age are ignored when it is an asset.

NOTE: Remember to check for interest, which is counted as income if greater than or equal to \$120 per vear.

#### **COVID-related income**

Temporary COVID-related income shall be ignored, including the following:

- Bonuses or hazard pay from any employers including tribal governments
- · Increased benefits to tribal members

#### Dividends/Interest

If the annual combined total earned is less than \$120, ignore the income.

#### Earned income for minors (under 18)

If the household member(s) is under 18, ignore earned income (including wages and Unemployment Compensation).

## Earned income for high school students 18 and over

If the household member(s) is age 18 or over **and** is a full or part-time high school student, ignore earned income (including wages and Unemployment Compensation).

#### **Flex Dollars**

Ignore flex dollars used for health insurance premiums when the dollars would not otherwise be available to the applicant.



#### **General Relief**

General relief from Interim Assistance (IA) programs for individuals that have applied for SSI is ignored income, as this assistance is repaid from the individual's lump sum eligibility payment.

## **Government Payments and Program Participation Income**

- Payments or allowances made under any federal, state, or local laws for the purpose of energy assistance, including WHEAP. Do not count payments specifically designated for heating/electric costs.
- Payments made to children of Vietnam Veterans born with spina bifida.
- VISTA income.
- AmeriCorps income.
- Base pay of military personnel called to temporary active duty when the individual is not in the household on date of application and when the temporary assignment will be for 60 days or more.
- Foster Care Payments for minor(s).
- Title V Senior Community Service Employment Program (SCSEP income, formerly Green Thumb).
- Wisconsin Senior Employment Program (WISE)
- Payments to volunteers under Title II (RSVP, Foster grandparents, and other) and Title III (SCORE and AGE) of the Domestic Volunteer Services Act of 1973 (P.L.93-113) as amended.
- Youth Incentive Entitlement Pilot Projects, Youth Community Conservation and Improvement Projects, Summer Youth Employment Program, and reimbursement of expenses provided under the Workforce Innovation and Opportunity Act (WIOA) and Wisconsin Conservation Corps.
- Uniform Relocation Assistance and Property Acquisition Policy Act of 1970 (P.L. 92-646, section 216).
- Alaska Native Claim Settlement Act (P.L. 92-203, Section 21(a)).
- Sub-marginal land of the United States held in trust for certain Indian tribes (P.L. 94-114, Section 6).
- Retroactive DEFRA payments.
- Payments made under P.L. 100-383 Wartime Relocation of Citizens. These are restitution
  payments made by the U.S. government to individual Japanese-Americans or their survivors and
  Aleuts who were interned or relocated during World War II.
- Monies received as a result of P.L. 101-41, Puyallup Tribe of Indians Settlement Act of 1989.
- Veteran's Aid and Attendance is ignored regardless of whether the aide/caregiver is a household member
- Certain government payments are counted income when the annual amount is equal to or greater than \$120. Anything less than \$120 is ignored.
- DNR Programs that pay royalties (e.g., Stumpage)
- USDA Programs (e.g., crop disaster relief programs)
- Agriculture Programs (e.g., CRP)
- Tax credits tax credits such as farmland preservation and homestead credit claimed on Wisconsin Income Taxes.



#### In-kind Income

Do not count any gain or benefit that is not in the form of money payable directly to the household, such as: meals, clothing, housing, or garden produce. This includes but is not limited to:

- Benefits received from the supplemental food program for Women, Infants and Children (WIC).
- FoodShare (Food Stamps) Benefits.

#### **Jury Duty**

Ignore any payments received for performing Jury Duty. If any counted income is paid during jury duty, the income is counted as normal. See Section 2.3.7 Income Counted Table.

## **Kinship Care**

Cash benefit paid to caretaker relatives of minor children. Count the child in the household.

#### **Land Rent**

Income from land used for, including but not limited to, cash crop fields or pastured livestock. Ignore annual amount earned if less than \$120; count as income if annual earned amount is \$120 or more.

#### Loans

Ignore all loans including, but not limited to, student loans and reverse mortgages a person received in the prior month test period from private individuals or business sources. (This includes advances on a credit card.)

## **Lump Sum Payments, Non-recurring**

There are some lump sum payments that are counted as income, but most are not. Examples of not counted lump sum payments include:

- Income tax refunds (paid in lump sums or weekly),
- Rebates,
- Earned Income Credits (EIC) paid in lump sum or weekly,
- Employer new-hire sign-on bonus,
- U.S. military (re-)enlistment bonus,
- Insurance settlement,
- Estate Inheritances,
- Trust funds, if the payment is a non-recurring lump sum,
- Refunds of Security deposits on rental property or utilities,
- Retroactive Social Security, Public Assistance or unemployment compensation payments,\*
- Severance pay,
- Tax intercept, or
- Homestead Tax Credit.

## Medicaid Purchase Plan (MAPP) Income

Wisconsin's Medicaid Purchase Plan (MAPP) offers people with disabilities, who are working or interested in working, the opportunity to buy health care coverage through the Wisconsin Medicaid Program. A person meets the work requirement for MAPP if engaged in a work activity at least one time per month.

<sup>&</sup>lt;sup>+</sup>If the lump sum payment includes an amount paid specifically for the prior month test period, that portion is counted as income.



Any wages earned to meet this requirement shall not be counted on the application.

# Money received by a disabled person or paid to a medical aide or other caregiver specifically to allow the disabled individual to live in their own home

- Money received through Family Care, Family Care Partnership, and IRIS programs (formally known as Community Options Program (COP)). Examples of agencies through which these benefits may be paid include Advocates 4U; Community Care, Inc.; Connections; Consumer Direct for Wisconsin; First Person Care Consultants; iCare; Inclusa, Inc.; Lakeland Care, Inc.; Midstate Independent Living Choices; My Choice Family Care Care Wisconsin; My Choice Wisconsin Health Plan, Inc.; Progressive Community Services; and TMG.
- Payments to a disabled person for the services of a medical attendant or live-in medical aide when the money is paid in total to the attendant or aid for services rendered.
- Payments to a live-in medical aide for their caregiving services will be ignored even if the aide is considered a part of the household.

## Payments made to a third party

- Rent payments paid by a relative who is not a household member.
- Payments by a government agency to a child caring institution providing day care for a household member.
- Payments of a household's medical bills made directly to a hospital by an insurance company.

#### **Refunds & Overpayments**

If overpayments are received in the prior month test period that the applicant is responsible to re-pay, do not count the amount of the <u>overpayment</u>. If repayment of overpayments is withheld from an assistance payment, or other source of income, count the full amount of the income before the overpayment is removed.

#### Reimbursements (money paid to the household for incurred expense)

As long as the payment is not more than what the household actually spent and is <u>not</u> for normal household living expense or shelter costs (rent, clothing, or food eaten at home). If the reimbursement was more than the actual expense, count the extra as income.

#### Reimbursement Examples:

- Flat allowances or per diem for job or training related expenses such as travel, uniforms, and transportation to and from a job or training site, including travel expenses of migrant workers.
- Out-of-pocket expenses incurred by volunteers.
- Reimbursement or allowances for students for specific education expenses, i.e., travel or books.
- · Medical and dependent care.
- Services provided under federal Block Grant programs.
- Respite Care received to pay for services.

#### **Student Income or Support**

Do not count financial aid such as scholarships, educational grants, fellowships, veterans' educational benefits (including educational subsistence allowances), ROTC scholarships, student loans, or book reimbursements as income for student(s).

Stipends received by a student are counted income; even if the source is ROTC.



## **Sub-Housing Utility Allowance/Reimbursement**

Do not count the heating/electric allowance/reimbursement as income.

#### **Subsidized Guardianship Payments**

Ongoing payments to persons becoming legal guardians of children in foster care, similar to the adoption assistance program for children who are adopted. The target population is children placed with relatives licensed as foster parents. Count the children in the household; do not count the subsidized guardianship payments.

#### Supplemental Security Income Exceptional Expense (SSI-E)

When received, SSI-E Exceptional Expense Supplement benefit must not be included as part of the state SSI income. Do not enter the SSI-E income amount.

\$-95.99 for Individuals

\$-345.35 for Couples (\$172.67 for each person)

\$-49.34 for Couple/One Spouse Eligible

## **Tribal Per Capita**

If the total gross amount received in the prior 12 months or previous tax year is \$2,000 or less, treat as ignored income. If over \$2,000, the first \$2,000 of Tribal Per Capita is ignored income; anything over in the same year is counted income. Divide by 12 to get a monthly amount.



# **Chapter 3 | Application Process**

# 3.1 General Application Rules

# 3.1.1 How to Apply

A household may apply for energy assistance by completing a paper version of the Home Energy Plus (HE+) Application, completing an online application, or participating in an interview with a WHEAP agency representative either in person or by phone.

Zero-income households' applications require agency contact with the customer. If an applicant mailed in an application or submitted an online application, a worker shall contact the applicant by phone to complete the application. If the applicant is not available, the worker shall create the application and leave the application as "Pending". An Incomplete Notification/Notice shall be sent informing the applicant to contact the agency to complete the application. Document in HE+ System Notes that the application is "Pending" because interaction is required with the applicant. For mailed applications, when the interaction of the application is complete, workers shall change the "Outreach Type" to phone or site where the interaction took place and add System Notes to explain that the new application replaces the paper application. For online applications, the worker does not change the "Outreach Type" when the interaction is complete; the "Outreach Type" remains as "Online".

NOTE: The Certification Page from the paper application is still valid for the application, and the date signed may be completed once the worker has verified the application with the applicant. See Section <u>3.4.27.2</u> for self-certification requirements when a paper application is received.

# 3.1.2 Where to Apply

Households must apply through an approved WHEAP agency for the county/tribe where they reside or apply online at <a href="https://energybenefit.wi.gov/">https://energybenefit.wi.gov/</a>.

## 3.1.3 When to Apply

Households have the right to apply at any time, regardless of whether or not the heating season has ended. Agencies should encourage households to apply. Early applications may be taken once the Division has determined the early application start date. (See <a href="Chapter 10">Chapter 10</a> for more information). Applications dated after May 15 may determine eligibility for Prevention Assistance, HE+ Program Services, and weatherization referrals.

## 3.1.4 Multiple Applications

A household may apply multiple times if not deemed eligible on earlier applications. Households have the right to apply throughout the year. For an application to be considered for regular heat/electric benefits it must be initiated before the end of the heating season. Every application shall have a dated applicant signature and a dated agency staff signature on the Certification Page. Signatures on "Withdrawn", incomplete, and "Denied" applications may not be used for a new application.

All duplicate applications received by the local agency shall be processed in the HE+ System with any information provided by the applicant. If the applicant chooses to withdraw the application, the



application must still be entered in the HE+ System. Exception: see online application.

## 3.1.5 Regular Benefits

WHEAP-eligible applicants may receive one regular heating and one electric benefit providing the application is initiated before the end of the heating season and LIHEAP or Public Benefits funds are available during the heating season. Once a household is determined to be WHEAP eligible the household remains eligible for Crisis Assistance for the duration of the program year regardless of the date of the application. An application becomes ineligible for additional benefits when any household member, including the case head, is deceased. A new application shall be taken to establish eligibility for the remaining household members. Eligibility does not ensure the provision of a crisis benefit. See Section <u>6.3.9</u>.

## 3.1.6 Weatherization Eligibility

At the time an applicant's HE+ Application is approved, the address reported on the HE+ Application is referred for Weatherization services. Referrals for Weatherization services extend for 12 months following the date of the approved HE+ Application. If an HE+ eligible household moves, the Weatherization referral does not automatically carry to the new address. The household may re-apply during the same program year to determine eligibility for Weatherization Assistance at the new address by completing an HE+ Application through the local agency. All applications must contain current, complete, and accurate information based on the date of the application. See the Weatherization Program Manual for restrictions regarding previously weatherized units.

Weatherization status associated with the address displays on the application after the address fields. More details may be found via the Referral Details tab/section. The 'Referral' permissions must be added in order to see the Referral Details tab. WHEAP agencies shall work with their Weatherization agencies to use and understand the information from the referral search function. WHEAP agencies are encouraged to work closely with their Weatherization agencies to help identify and refer homes for weatherization services.

#### 3.1.7 Limitations

There is no entitlement to WHEAP or Weatherization Assistance. Being eligible does not mean Regular Benefits, Crisis Assistance, Furnace, or Weatherization benefits will be provided.

## 3.1.8 Fair Hearings

If the individual believes their regular application has not been processed timely, has been incorrectly denied, had an error in determining eligibility, their payment is incorrect, or their crisis request was not processed in a timely manner, they may request a fair hearing (see Section 1.8.2).

Local agencies shall work with the customer in an effort to resolve the issue prior to the Division of Hearings and Appeals (DHA) hearing.

## 3.1.9 Application Processing

Applications are to be entered/processed in the chronological order in which they are received. The application completed with the first chronological date, from applicants who file more than one



application, will have precedence in processing. See Section 3.3.4.

All applications are to be entered into the HE+ System within 30 days (see Section 3.3.4.) after the application process is started. Any application materials mailed, faxed, dropped off at the agency, or otherwise provided to the agency outside of the original appointment, must be date stamped upon receipt.

Each application and each section of the application must be completed to the maximum extent possible regardless of information that may cause a denial of benefits. The local WHEAP agency must assure each application is complete in all parts unless the applicant withdraws the application or fails to provide required information within 30 days of the application date.

All applications received in the early application process shall be entered into the HE+ System prior to October 31. In addition, missing information for incomplete early applications can be received until October 31 to be considered complete.

NOTE: see Section 3.3.4 for additional information on processing oOnline applications

#### 3.1.10 Fraud Prevention

Any application for an agency employee, relative of an agency employee, former employee, or a friend of a worker shall be reviewed and approved by a staff person at a supervisory level or higher, and entered into the HE+ System by someone holding the "Supervisor" permission. This permission must be held by no more than two\* WHEAP staff persons of a supervisory role within the agency. In addition, a System Note indicating the manager/supervisor who reviewed the application must be entered. This restriction applies to any actions related to the individual's Regular Benefits, Crisis Assistance, and Program Services applications.

All agency staff who work with WHEAP are required to agree to the Conflict of Interest Policy/Non-Disclosure Agreement. (For more information refer to Section <u>8.5.1.1</u> and <u>Appendix A</u>.)

If the only agency person with the "Supervisor" permission is faced with taking an HE+ Application from their friend or family member, contact the HE+ Help Desk for guidance <u>before</u> taking the application.

\*If an exception is needed to this limit, please contact the HE+ Help Desk.

## 3.2 Application Formats

#### 3.2.1 Interactive

The interactive application is the same as the paper application form that is located on the Division website and is filled out during an interview process with a WHEAP intake worker. The application is interactive when the information is entered into the HE+ System during the interview.

NOTE: See Section 3.3.4 for additional information on processing online applications



# 3.2.2 Home Energy Plus Application (Long Form)

The long form, Home Energy Plus (HE+) Application, is the paper version of the application in the secured HE+ System. HE+ Application Forms shall not be altered without prior approval by the Division. WHEAP agencies may use the form to conduct a mailed application or to conduct intake when the HE+ System is not accessible. If the paper version is used in a face-to-face or phone appointment, the "Is Interactive" field shall be entered as "No". Although the form was designed to be completed by local WHEAP staff, individual applicants may submit a completed form to apply for assistance. If an applicant submits a paper application form or any other documentation, that form must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason.

The Division periodically updates the HE+ Application Form. Applicants shall submit only a current form to apply for Energy Assistance. Prior versions of the application form shall not be accepted by the local agency. If an applicant submits a previous version, start the application in the HE+ System by entering the required minimum application information (application date, applicant name, applicant Social Security Number (SSN),\* applicant date of birth, applicant gender, housing type, applicant mailing and residence address) and leave it in "Pending" status. Conduct a phone application to complete the application and request a current Certification Page or mail an "Incomplete Notification/Notice" to the applicant with the current version of the HE+ Application Form enclosed. Do not complete the "Sign Date" field or submit the application until the applicant returns the current, completed, signed, and dated Certification Page.

If a current HE+ Application is received by the local agency without the applicant signature, enter the application in the System by entering the required application information and leave it in "Pending" status. Conduct a phone application to complete the application and request a current Certification Page or mail an "Incomplete Notification/Notice" to the applicant with a Certification Page to sign.

The Certification Page must be signed by the applicant and the worker before the application is considered complete. Do not complete the "Sign Date" field or submit the application until the applicant returns the completed, signed, and dated Certification Page. The worker must also sign the Certification Page prior to submission for benefit eligibility in the HE+ System. A complete Certification Page includes an applicant signature and date, and a worker signature and date.

Telephonic signatures are allowed for the Certification Page. See Section 1.6.

The Spanish version of the HE+ Application is available for applicants but does not replace the policy requirement that agencies have a method to orally communicate with persons with limited English proficiency (LEP). See Section 8.2.3 for more information.

## 3.2.3 Home Energy Plus Short Application Form

The Home Energy Plus Short Application Form was designed only for use with fixed income households where the applicants:

<sup>\*</sup> An application without an SSN for the case head does not meet the minimum application requirements and is not a valid application.



- 1. are at the same address as the last application;
- 2. have no change in the household member composition;
- 3. have no minor household members; and
- 4. only receive income from one or more of the following income types:
  - a. Social Security including SSDI, SSI;
  - b. Dividends/interest;
  - c. Pension; and/or
  - d. Veterans benefits

All instructions and guidance in this WHEAP Manual apply to HE+ Short Application Form in the same manner as they do to the HE+ Application Long Form. The HE+ Short Application Form is located on the Home Energy Plus Training and Technical Assistance (HE+ TTA) website under WHEAP > Forms. HE+ Short Application Forms shall not be altered without approval by DEHCR.

If an applicant submits a HE+ Short Application Form or any other documentation, that form must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason.

When an HE+ Short Application Form is submitted and the agency determines the household did not meet the HE+ Short Application Form criteria, a full application process must be conducted. The application is incomplete until all information is verified. The HE+ Short Application Form with applicant signature must be uploaded into the HE+ System. The agency is not required to obtain a new applicant signature for the full application process, and the original HE+ Short Application Form date shall be maintained. Document in HE+ System Notes how the full application process was conducted.

## 3.2.4 Automated Applications

Households a) whose income in the previous year came only from Social Security (retirement) and/or Veterans Benefits, b) who receive gas and electric service from one of the Investor-Owned Utilities (IOUs), which include Alliant, MG&E, Xcel, WPS, and We Energies, and c) who have the same housing characteristics as the previous year (have not moved), may be provided with automated WHEAP benefits without being required to submit a new application. Automated applications are processed for eligible households for two consecutive program years; customers must apply via another method after having automated applications for two consecutive program years.

The automated application households are identified from the previous year's data and the utilities verify the household is at the same meter and provide the energy account information. The local WHEAP agency is not required to take an application for these households.

The Division mails a letter to the automated application customers upon creation of their automated application. See <a href="Appendix G">Appendix G</a> for a template of the automated application customer letter. If the local WHEAP agency is contacted by the customer stating information on the letter differs from their current information, the local WHEAP agency shall complete the following:

Update and save the automated application in the HE+ System;



- Send a Certification Page to the applicant with any requests for additional documentation, if warranted\*; and
- Document with an HE+ System Note that information was updated and requested.

Any documentation the customer provides must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason.

\*The Certification Page shall be uploaded into the HE+ System for file retention under 'Other WHEAP documents'.

## 3.2.5 Phone Applications

Phone applications may be accepted. Phone applications may be interactive if the data is entered directly into the HE+ System during the interview.

- The application date is the date of the phone interview.
- The application needs to be "saved" which will put it into "Pending".
- Send the Certification Page to the applicant with requests for additional documentation. If
  the phone application is conducted interactively, using an HE+ System-generated
  Certification Page is the preferred method. Document with an HE+ System Note that
  information was requested. An application is not complete until the Certification Page
  signed and dated by the applicant is received for that application. Telephonic signatures
  are also allowed for the Certification Page. See Section 1.6.

If the applicant returns the information within 30 days, enter the additional information, save and submit the application and then "Accept Benefits" for payment. If the documentation is not returned within 30 days, the HE+ System will deny the application as incomplete. The applicant will have to reapply.

## 3.2.6 Abbreviated Applications

Households a) whose only income reported is fixed income, as defined in WHEAP Policy: Social Security includes SSDI, SSI; Dividends/Interest; Pensions; and/or Veterans Benefits in the previous year, b) who have had no changes to the household members or type of income reported from the previous year, and c) who have the same housing characteristics as the previous year (have not moved) may apply using the abbreviated process.

Eligible customers are not required to submit a new application form. The local WHEAP agency shall identify eligible customers by using previous year's data; all application information received over the phone is required to be verified by the local WHEAP agency.

A new Certification Page is not required to be obtained. The most recently signed Certification Page shall be uploaded.

## 3.2.7 Online Application

Online applications are entered into a customer web portal that interfaces with the HE+ System (secured site). The interactive indicator is automatically set by the HE+ System as interactive because the applicant has entered most of the application information online. During the validation process, the information is directly imported into the HE+ System by the local WHEAP agency.



- The application date is the date the customer submits the online application (HE+ Systemgenerated)
- The 30 days allowed to complete an application begins as soon as the applicant submits the online application
- Validation of an online application is the required first step of creating an HE+ Application in the HE+ System
- The application needs to be "saved" which puts it into "Pending" state and status

#### 3.2.8 File Retention

Documents shall be uploaded into the HE+ System for file retention. Agencies are not required to retain documents as a paper file once the document has been uploaded.

When applicable, the following documents are required to be uploaded to the HE+ System:

- Paper applications
- Authorized Representation and/or Power of Attorney (POA) documentation
- Zero Income Form(s) for all adult household members
- Documents used to verify income (paystubs, wage print-outs, Self-Generated Income Report Form, tax forms, and/or supporting schedules, etc.)
- Certification Page (signed by customer and worker)
- Incomplete Forms/Letters that are not HE+ System-generated (shall be uploaded to the "Other WHEAP Documents" repository)
- WHEAP Affidavit of Lost, Stolen or Destroyed Benefits Form (shall be uploaded to the "Other WHEAP Documents" repository)

For additional record keeping requirements, see Section <u>8.5.3</u>.

# 3.3 Processing an Application

#### **3.3.1 Access**

The secured database/website where applications are stored and from which applications are processed is referred to as the HE+ System and is located online at <a href="https://heplus.wi.gov">https://heplus.wi.gov</a>. Entrance to the HE+ System site is controlled by a security agreement, a user name, security image, and password. Incorrectly entering the login information five times will result in the profile being locked. Users should contact their agency HE+ System Profile Management Administrator (PMA) to unlock the profile. The local PMA is responsible for creating users, assigning permissions, and verifying intake worker **Personally Identifiable Information** (PII). The creation of or changes to a PMA in the HE+ System must be completed by the Division of Energy, Housing and Community Resources. Any updates to agency PMAs must be submitted in writing to the HE+ Help Desk. As part of the security on the HE+ System, all local WHEAP workers with Application Intake permissions will be required to enter their Social Security number (SSN) and date of birth (DOB) upon their first log on. Workers' SSNs will be visible to only the PMA for the territories assigned to that user. Any changes in user system permissions will result in the user needing to agree to the newly assigned permissions and the Conflict of Interest/Non-Disclosure Agreement statement (see Section 8.5.1.1).



The Division maintains a non-secured, or public, website. The public site can be accessed directly at <a href="https://energyandhousing.wi.gov">https://energyandhousing.wi.gov</a>. A substantial amount of information is available on this site for both WHEAP and the Weatherization Assistance Program.

#### 3.3.2 Verification of Information

The information entered in the application on the HE+ System must be true and correct. WHEAP workers are to verify all information before it is entered in the HE+ System. Workers shall upload copies of all documents to the HE+ System as proof the information entered is correct.

- All income documentation is required to be retained as a document upload to the HE+ System. Additional application related documents that require upload to the HE+ System include:
  - Zero Income Form(s)
  - Paper applications
  - Certification Page (signed by customer and worker)
  - o Authorization of Representation forms, when applicable
  - Non-HE+ System-generated Incomplete Forms/Letters

The document upload automatically completes the verification field.

If a worker discovers that verified application information differs from the submitted paper HE+ Application or if additional clarification is needed, discrepancies and clarification shall be documented in HE+ System Notes.

If the information entered on the current year application differs from application history, discrepancies shall be documented in HE+ System Notes.

NOTE: Agencies are no longer required to retain paper files due to the HE+ System upload requirements. For additional file retention requirements, see Section 3.2.8

## 3.3.3 Validation of Applicant Data

Workers are required to use data validation functions that are available in the HE+ System when processing HE+ Applications. For example, the HE+ System uses the Master Customer Index (MCI) to validate SSNs and the Wisconsin Energy Fuel Information (WEFI) web service to confirm information about the status of Investor-Owned Utility (IOU) accounts. Information displayed as part of the data validation must be reviewed for accuracy prior to use for application processing. Applications that require bypassing the data validation functions must have documented justification in HE+ System Notes. The data validation functions are only to be used to validate and retrieve data relevant to an HE+ Application. Misuse may result in inactivation of a worker's WHEAP user profile and may include further disciplinary action.

## 3.3.4 Online Application Processing

Applicants may submit applications online via the online application portal located at <a href="https://energybenefit.wi.gov/">https://energybenefit.wi.gov/</a>



Agencies must complete validations of some of the online application information before creating an HE+ Application in the HE+ System. An online application can only be validated if the applicant provides a correct SSN for all household members.

If an online application is received with incomplete information and/or verifications, an Incomplete Notification/Notice shall be sent informing the applicant of what verifications are required to complete the online verification. Workers shall upload the Incomplete Notification/Notice into the HE+ System if an alternative form to the system-generated notice is used. Workers may also provide verbal notice of what verifications are required to complete the online verification. If the agency provides verbal notice instead of written notification, workers shall enter HE+ System Notes stating the customer was provided a verbal notice and describing the missing application information.

NOTE: An online application may be voided if the customer has already received Regular Benefits in the same program year and is not applying for weatherization services at a new address. An HE+ System Note is required to explain why the online application was voided and when the customer contact occurred.

# 3.3.4.1 Online Application Statuses

In-Progress – The customer has started an online application in the online application portal. The customer has not yet submitted their online application. Applications that are in-progress will expire after 30 days of inactivity.

Submitted – The customer has submitted an online application and the local agency may begin the validation process.

Under Review – The worker has validated some of the information.

Application Created – The worker has completed the validation and has created an application in the HE+ System.

Void – The worker has voided the online application in the HE+ System. HE+ System notes are required to explain why the online application was voided and when the customer contact occurred.

Application Expired – After an online application has been in progress for 31 days, the HE+ System updates to this status and the customer must create a new online application.

## 3.3.4.2 Updating Online Statuses

The HE+ System sends a text message and/or email to customers to notify them when the status of an online application is updated. The following instances result in an HE+ System-generated notification sent to the customer:

- "Submitted" applications changed to "In Progress"
- "Submitted" applications changed to "Void"



"In Progress" applications changed to "Void"

Agencies are required to contact the customer before changing the status of an online application. HE+ System Notes shall be entered explaining why the status\* was changed and when the customer was contacted.

\* HE+ System Notes and customer contact is required when any statuses are changed except when the status is changed from "Submitted" to a WHEAP application.

# 3.3.4.3 Validating Online Applications

Validation of information is required before an HE+ Application can be created in the HE+ System. Agency staff are required to validate the address, all household members' Social Security numbers (SSNs) and landlord information (if applicable) prior to creating an HE+ Application in the HE+ System.

## Online Applications with Incorrect SSN

When an online application has an incorrect SSN that is preventing conversion to an application in the HE+ System, the online application status shall be changed to "In-Progress" and the customer shall be instructed to correct this information.

## Follow these steps:

- The WHEAP agency shall notify the customer that an SSN on the application appears to be
  incorrect and needs to be corrected. Explain that the application status will be changed to
  "In-Progress" for them to review and edit the application. The customer should be advised
  that they will receive a general message that their application needs additional information.
- The WHEAP agency shall change the online status to "In-Progress". The applicant receives notification by the communication method that they selected when they completed their online application. The message is not detailed, which is why it is important that the agency contacts the customer before taking action.
- The applicant shall edit the online application to correct the SSN for either themselves or for a household member(s) and resubmit the online application.

## Online Applications with Incomplete or Incorrect Landlord Information

When a customer enters incomplete landlord information or selects "I Don't Know", agency staff shall edit the information and complete a landlord search before continuing to process the online application. The application shall not be put back to "In-Progress" status. The worker shall contact the customer if additional information is needed.

## **Duplicate Online Applications**

If an online application is received for the same program year and the household already has a "Paid" application and is not applying for weatherization services, the agency staff may void the online application. The following steps must be completed prior to updating an online application status to "Void" In the HE+ System.

1. The WHEAP agency shall notify the customer that a duplicate online application has been received for the same program year and explain that applicants are only eligible for one regular benefit during each program year.



- Discuss any Crisis and/or Weatherization Assistance needs (if applicable).
- 3. Enter HE+ System Notes that explain why the online application was voided and when customer contact occurred.

## 3.3.5 Updating Applications Created by Another Agency

When agencies cover the same service territory, they may update and/or complete a pending HE+ Application created by another agency serving the same territory.

# 3.3.5.1 Updating an Application Created by Another Agency

If an agency obtains required documents for an HE+ Application created by another agency within the same service territory and the customer is not in an emergency situation, the agency may take the following actions:

- Edit and save the application to take "ownership" and to activate the document upload functionality.
- 2. Upload documents to the application in the "Other WHEAP Documents" repository.
- 3. Create an HE+ System Note explaining the document upload, including the method of contact with the customer and the date of contact with the customer.
- 4. Send an email to the associated WHEAP Coordinator about the document upload to the agency that created the application. For Energy Services, Inc. emails, please send to: <a href="mailto:support@wheap.help">support@wheap.help</a>. The email subject shall be: (Name of territory) Verification uploaded PID \_\_\_\_. For example, Ashland County Verification uploaded PID 111111. The email shall include the following information:
  - a. Application Number
  - b. a description of the document(s) uploaded to the application, and
  - c. the date the document(s) were received from the customer.

Once notified of the document upload, the original agency will retake "ownership" of the application by editing and saving the application.

NOTE: The agency performing the document upload shall not change the original Outreach Type.

## 3.3.5.2 Completing an Application Created by Another Agency

An agency may transfer "ownership" and complete an application created by another agency in the same service territory if the customer is in an emergency, such as being disconnected, up for disconnection, low/out of fuel, or in need of emergency furnace service. The following actions are required:

- Contact the HE+ Help Desk for approval before transferring "ownership" and completing the application.
- 2. Create an HE+ System Note explaining the application "ownership" was transferred due to the customer's emergency situation. Notes must explain the emergency, why the application "ownership" was transferred and submitted, the method of contact with the customer, and the date of contact with the customer.
- 3. Edit and save the application to take "ownership" of the application.



4. Thoroughly review the application for accuracy before submitting, as the agency that submits the application "owns" it and any Desktop Monitoring (DTM) findings will have that agency responsible for any non-compliance with HE+ policy.

NOTE: The agency submitting the application shall not change the original Outreach Type.

# 3.3.5.3 Deleting or Cancelling an Application Created by Another Agency

An agency shall not delete or conduct a cancel/refund on an HE+ Application created by another agency without first consulting with the HE+ Help Desk.

# 3.4 Field-by-Field Instructions/Guidelines

# 3.4.1 Application Date

Table 3.1: Determining Application Date Based on Application Format

Application Formats	Application Date
HE+ System Application (i.e., Interactive Application)	The date the <b>interactive interview</b> takes place.
Phone Application (paper or interactive)	The date of the phone interview.
Paper Application taken by WHEAP worker (at outreach site or because the HE+ System is down)	The date the interview takes place.
Paper Application completed by applicant and mailed or dropped off at agency	The date the application was received by the agency. Each application must be date stamped upon receipt.
Online Application	The date the applicant submitted the online application

#### 3.4.2 Worker Number

Up to a four-digit local agency assigned number, individualized for each worker, can be entered.

#### 3.4.3 Interactive Interview

To be interactive, information provided by the applicant must be entered into the HE+ System during the course of the interview. An interactive interview may be face-to-face or over the phone.

#### 3.4.4 Outreach Indicator

The outreach indicator assists the local agency in tracking the method in which an application is received.

- Local Agency Application process is conducted face-to-face at the county/tribal office.
- Alternate Site Application interview is conducted face-to-face at a location other than the main county/tribal office. For WHEAP purposes, elderly meal sites, or other outreach sites are alternate sites.
- Home Visit Application is taken face-to-face in the applicant's home.



- Mail Applications that are submitted to the agency via United States Postal Service (USPS) mail or dropped off at the front desk of the agency.
- Phone Applications that are taken over the phone.
- Abbreviated Applications that are taken over the phone using the Abbreviated Application process.
- Online Applications that are received online via the Online Application Portal
- Automated Applications that are processed by the HE+ System for a specified subset of prior year recipients

#### 3.4.5 Withdrawn

"Withdrawn" applications must be entered into the HE+ System. An applicant may choose to withdraw the application any time prior to extraction. "Withdrawn" applications should always have at least the minimum information entered. All information provided should be entered even if the application will be withdrawn.

HE+ System Notes about the reason for the withdrawal must be entered. An HE+ System-generated denial letter is sent to the applicant.

When a current year application is withdrawn, it is not possible to create another application on the HE+ System until the "Withdrawn" application is extracted.

# 3.4.6 Social Security Number (SSN)

SSNs must be verified through the HE+ System. The HE+ System will prompt a web call to verify each SSN listed on the application. See Section 2.2.3 for more information on verifying SSNs.

## 3.4.7 Field #1 Territory (County/Tribe)

Applicants must apply in the county or tribe where they reside on the date of application.

## 3.4.8 Field #2 Applicant (First and Last Name)

The first and last name entered in this field shall be the legal name of the applicant. Any non-legal form of the name shall be entered in Field #3, Alias.

#### 3.4.9 Field #3 Alias First Name

The first and last name entered in Field #2 shall be the legal name of the applicant. Field #3 shall be used to enter any other name that the applicant elects to be known as. For example, *James* is the legal name entered in Field #2, and *Jim* is the Alias entered in Field #3.

# 3.4.10 Field #4 Primary Phone/Secondary Phone

Enter the primary telephone number provided by the applicant.

## 3.4.11 Field #5 Email Address

Providing an email address is optional. The applicant should only provide their email address if they are permitting the agency and/or the Division to send emails related to HE+ programs. Email



addresses will not be shared outside of HE+ programs.

## 3.4.12 Field #6 Preferred Communication

Select the preferred method of communication for the household. This field is not required. By providing this information the applicant is providing consent to contact the household via the selected method.

## 3.4.13 Field #7 Housing Type

Select the housing type that best describes the applicant's residence.

- "Single family" for one unit (detached) structures.
- "2- to 4-unit building" for small apartment buildings (and condominiums), and includes duplex buildings (2 units), triplex buildings (3 units), and four-unit buildings. If the structure has business use in the one of the units, check the appropriate building type based on the number of units; for example, if there is a bar on the first floor and a residential unit on the second floor this is considered a duplex, 2 units. The HE+ System requires an entry in "Unit Count" which represents the number of units in the building where the customer resides and must be 2, 3, or 4.
- "Apartment or multi-unit building" (including condominiums) when there are more than four units in the building. The HE+ System requires an entry in 'Unit Count' which represents the number of units in the building where the customer resides.
- "Mobile home" when it is a mobile home (trailer in the old terminology) or a manufactured house (new terminology) that was towed to the site (even if it was more than one part that is tied together at the site). Use mobile home for units on private land or in mobile home parks. If the structure is a modular home, not a mobile home, check single-family house.
- "Motel or Camper/RV" when the applicant resides in a motel, hotel, or camper/recreational vehicle. To be eligible, this must be the applicant's primary residence and the applicant must have an energy burden. Agencies must add an HE+ System Note describing the customer's situation and contact the HE+ Help Desk for approval for all applicants with this housing type. This housing type is not eligible for referrals to Weatherization or HE+ Program Services.
- "Ineligible Dwelling" if the location where the applicant is living is an ineligible dwelling type. Examples include a motel room or camper/RV that is not a primary residence or has no energy burden, tent, or other ineligible type, including an applicant's non-primary residence.

When a dwelling does not correspond to one of the standard housing types, pick the type that seems closest and document in HE+ System Notes the reason for selecting that housing type. Guidance may also be provided by the HE+ Help Desk.

Refer to the Dwelling Eligibility Table in Section 2.2.2.1.

## 3.4.14 Field #8 Mailing Address

The mailing address is where the applicant gets their mail at the time of the application. The applicant's mailing address may be different from the residence address (for example, a PO Box). If the mailing address differs from the residence address and is not a PO Box, an HE+ System



## Note must be added to explain why the two addresses are different.

If the envelope icon by the address is red, the application will not extract until the address has been corrected. Data entry may be continued on the application, but the application will not extract until the mailing address has been validated or overridden in the HE+ System. When requesting an override, an HE+ System Address Note must be added to document how the mailing address was verified. The United States Postal Service website or confirmation from the post office that the address is deliverable are the only allowable sources for address validation. HE+ System Notes will be reviewed by Division staff to assist in validating the address.

If the applicant has his/her mail delivered to a legal guardian, protective payee, or an **authorized representation**, enter that person's address in this field.

#### 3.4.15 Field #9 Residence Address

Enter the (physical) address where the applicant resides at the time of the application by clicking on the house icon. Do not enter a PO Box number in the residence address. Enter only the physical address (see Field #8, Mailing Address).

Compare and verify the street address from the prior year. If different, enter the correct street address. When changing an address, the HE+ System will ask if you wish to clear all fields related to the dwelling. If the applicant has moved, select "Yes" to clear out all housing-related fields including fuel account information.

This address represents the applicant's location on the date of application. If the applicant moves before the case has been paid, change the mailing address only (see Field #8, Mailing Address). If the applicant moves after the case has been paid, update the person's Master Record (not currently available).

If the residence address returns as a duplicate with a different case head during the same heating season, an HE+ System Note shall be added to demonstrate the questions asked to determine the validity of two paid cases at the same address in the same heating season (Ex: First applicant applied in October, second applicant applying in March and stated they moved in during February). DO NOT provide information to the applicant regarding any other applicants who have applied at the same address.

## 3.4.16 Field #10 Ownership Type: Own or Rent

If the customer lives in a mobile home and owns the unit, indicate they are an owner even if they pay lot rent in a mobile home park.

Landlord and/or management company contact information is essential to Weatherization referrals. For all rental situations, agencies shall enter the landlord or management company contact information in the HE+ System. The landlord's or management company's name, address, and phone number are *required*. Workers shall enter new landlord or adopt existing landlord information. If existing landlord information is different from what was provided by the customer, workers must contact the HE+ Help Desk. If landlord or property management company information is not provided, the application should remain in "Pending" status until the customer



provides the required information.

For applications with "Direct Pay Accounts", workers shall not allow an application to deny if the customer does not provide landlord information within 30 days of the application date. Applications may need to be reinstated if denied incorrectly for not providing landlord information. Workers shall document in HE+ System Notes that the landlord or property management record was not added to the HE+ System since the applicant could not provide all three data elements (name, address, and phone number) and include any partial information provided.

For applications with "Rental payment includes energy in the monthly rent" and/or "Separate payment is made to the landlord..." workers are required to enter landlord or management company contact information.

Customers are required to provide verification for the following payment methods and the means of verification must be indicated in HE+ System Notes:

- Rental payment includes energy in the monthly rent. Separate payment is made to the landlord, mobile home park owner.
- Do not pay

Verification may include, but not is limited to:

- Observation of utility allowance on Form 50058 or Form 50059
- Observation of a lease or rental agreement,
- Verbal contact with the landlord, or
- In some cases, the heating vendor can verify if heat is included.

NOTE: Observation of previous years' information is not an acceptable form of verification and new verification must be obtained.

NOTE: For multi-unit buildings, the agency may obtain information from the landlord/management company verifying that all units have heat and/or electric included in rent, a separate payment is made to landlord, or are "do not pay". This verification may be used for all units within the building and must be obtained on an annual basis. The means of verification must be indicated in HE+ System Notes.

## 3.4.17 Field #11 Room Count

Count and enter the number of rooms in the applicant's dwelling. Do **not** count bathrooms, unfinished basements, entryways, hallways, laundry rooms, porches, closets, or unheated attics. Do not count rooms that contain a swimming pool, hot tubs, or spa.

- If the housing type selected is Motel or Camper/RV, the number of rooms must equal one.
   The HE+ System will not accept a value greater than one.
- The maximum number of rooms the HE+ System will accept is nine. For a household that has more than nine rooms, enter nine.

If the applicant uses part of the home for business use, do not count rooms that have been used



on a regular basis in the last 12 months for business purposes.

Example: If the applicant is the owner of a building which includes rooms the applicant has rented to roomer/boarders or overnight guests ("Bed & Breakfast"), do not count the rented rooms.

To aid in determining an accurate room count for combined living spaces such as kitchen/dining area, great room, studio or efficiency apartment, or other large living space, hypothetically insert a wall(s) separating the spaces. If the residents can utilize the resulting rooms with the same or more utility and without increased inconvenience, the room count shall be counted as more than one room. If the existence of the hypothetical wall would result in a lack of utility and increased inconvenience, the room count should be one. No more than three rooms shall be counted for any open living space.

## 3.4.18 Field #12 Living Situation

Selecting "Are currently in a homeless situation moving to a permanent residence," will <u>not</u> make the applicant ineligible. Document the proof of permanent address in the HE+ System Notes.

## 3.4.19 Field #13 Is Government Assisted Housing: Rental Assistance

There is a broad range of rental assistance programs available to low-income families. There are projects done under the auspices of the federal Department of Housing and Urban Development (HUD), the Farm Service Agency (FSA), and a variety of other programs including those using Wisconsin Housing and Economic Development Authority (WHEDA) funds. The worker may request a current copy of HUD Form 50058 or Form 50059 to verify their rental assistance. These forms are issued annually and can be verified that the most current form is provided by viewing the expiration date (Exp mm/dd/ccyy) showing on the form. Check with the local Housing Authority for the location(s) of building(s) they operate or know about. The WHEDA website lists some subsidized housing units in Wisconsin at <a href="https://www.wheda.com">www.wheda.com</a>.

Residents of these buildings may directly pay their utilities, or they may have one or more of the utilities included in the rent. A heating allowance or utility allowance may be provided to the residents, often through an additional reduction in the rent. A copy of Form 50058 and Form 50059 may also be used to verify their utility allowances.

NOTE: If there is no "Utility Allowance" listed on the form, their utilities are included in rent. A copy of their lease or verbal contact with landlord and an HE+ System Note is required to verify which utilities are included in rent. See <u>Appendix C</u> for a copy of Form 50058 and 50059. Do not count utility allowances or reimbursements as income.

## 3.4.20 Field #14 Guardian Type: Designated Representation

If the applicant has a Guardian or Designated Representative, the information should be entered in this field. If the Legal Guardian, Power of Attorney, Protective Payee, or authorized representative is creating the application for the applicant, they will sign the application rather than the applicant. Document in HE+ System Notes what form of verification was viewed for these scenarios (Authorization of Representation/Affidavit of Agent Form, Power of Attorney papers, etc.).

If the form of verification viewed is the Authorization of Representation/Affidavit of Agent Form, the



following procedures shall be followed:

- 1. Document in HE+ System Notes the duration the applicant authorizes the agent.
- 2. The authorization is valid for all HE+ Applications until the date indicated on the form, not to exceed five program years.
- 3. If no date was provided for the "Authorization is valid until" date, the authorization is only valid for one application. Document in HE+ System Notes.
- 4. The form shall be:
  - a. Uploaded into the HE+ System for the duration of the authorization, and
  - b. Reviewed each program year and made available to the Division upon request.

A protective payee is someone designated by the Social Services Agency to assist with or fully handle an applicant's finances. Enter the name of the representative payee. Do this only if the applicant wants the benefit notice/check sent directly to the representative payee. The benefit notice/check will be sent to the address provided in Field #8, Mailing Address.

If the case head is a dependent child, enter the parent's name here. A dependent child may be a case head if all adults in the household are ineligible non-citizens <u>and</u> the dependent child is either a citizen or an eligible non-citizen <u>and</u> the child has a valid SSN. The parent/legal guardian of the dependent child who is the case head should sign the Certification Page and an HE+ System Note should state who signed the application. A dependent child *should not* sign the Certification Page even if they are the case head.

## 3.4.21 Field #15 Student Situation

Students aged 25 and older as of the date of the application are eligible case heads. The applicant's student status does not need to be verified.

Students under age 25 as of the date of the application are not eligible case heads (applicants) unless they meet specific conditions. This question is intended to help determine if an individual satisfies any of the exceptions. A student could be a household member, not a case head, without the need to satisfy the exceptions for student status. Individuals enrolled in high school are dealt with under the provisions for emancipated minors.

## 3.4.22 Field #16 Is Child Family Housing

If anyone in the household under age 18 is related to any other adult household member, answer "Yes". If an appropriate relationship exists, the Division can bill the benefit payment to TANF. The paper version of the HE+ Application includes a list of qualifying relationships. Click on "View Relationships" for a list in the HE+ System if unsure what type of relationship qualifies.

## 3.4.23 Field #17 Total # Household Members

The total number of individuals living in the household on the date of application should be entered on the application and shall be entered in the HE+ System. The number of household members entered in the "Household Members" section must match the value entered in Field #17 of the general section. When processing a paper application, all persons listed on page 3 of the paper application form, shall be included in the count entered in this field even if waiting for required



household member data elements.

#### 3.4.24 Field #18 Is Present Month Income

Identify which test period is being used to verify the household income. When selecting "Yes", the income is verified for the present month. If selecting "No", the prior month test period is being used. See Section 2.3.2 for the policy exception that allows using the present month as the income test period instead of the prior month.

#### 3.4.25 First 18 Fields

The minimum information required in the first 18 fields in order to continue with the application is:

- Case Head SSN;
- Case Head Name, Date of Birth, and Gender;
- Application Date;
- Housing Type;
- Mailing Address; and
- Residence Address.

NOTE: An application without an SSN for the case head does not meet the minimum application requirements and is not a valid application. An Application without an SSN for the case head shall not be entered into the HE+ System until an SSN is provided.

#### 3.4.26 Household Members

All persons living in the household on the date of application shall be entered in the HE+ System before the application is considered complete. Household members cannot be entered until the required data elements have been provided (name, date of birth, gender, and SSN). *Exceptions*: **Temporary Household Member** (see Section 2.2.6.3).

The total number of household members on Field #17 of the general section shall include the household member(s) that cannot be entered because the required household member data elements were not provided at the time of application entry. The application will be incomplete until the required data has been provided. The household member section will not be complete until the number of household members entered matches the number of household members indicated in Field #17 of the general section.

NOTE: The HE+ System inserts the case head as a household member. If the case head's name, date of birth, or citizenship is incorrect, you must make the correction in the household members section of the application. Information for all household members must be verified.

#### 3.4.26.1 Gender

Gender is a self-declared field; enter the gender for each household member as the applicant reports it.



## 3.4.26.2 Citizenship Type: Citizen/Eligible Non-citizen/Ineligible Non-citizen

Include ineligible non-citizens and their income on the application. The HE+ System will not count the ineligible non-citizen as a household member, but it will count their income when determining program eligibility and benefit amounts.

## 3.4.26.3 Ethnicity Type

Select the ethnicity type that each household member identifies with: Hispanic/Latinx, Non-Hispanic/Non-Latinx, Unknown, or Decline to answer. Decline to answer may be selected if field is not completed by the applicant on the paper application.

#### 3.4.26.4 Race

Select the race that each household member identifies with: Asian, Black or African American, Hispanic/Latinx, American Indian or Alaska Native, Multi Race (2 or more), Other, Native Hawaiian or Other Pacific Islander, White, Unknown, or Decline to answer. Decline to answer may be selected if field is not completed by the applicant on the paper application.

#### 3.4.26.5 Disabled

Disability is a self-declaration that their disability limits their life activities. Verification is required if a student claims disability status.

#### 3.4.26.6 FoodShare

FoodShare should be marked "Yes" if that person received FoodShare in the prior month to the date of the application.

## 3.4.26.7 Military Service

Military Service includes a person who is serving or has ever served in a branch of the United States military as Active Duty, Reserve, or National Guard (Army, Navy, Air Force, Marine Corps, and Coast Guard).

## 3.4.27 Household Income

All household members must report and verify their income received in the test period—for most applicants this means the month prior to the application date. See <a href="Chapter 2">Chapter 2</a> for further clarification on income.

Household members can have multiple incomes. Enter each income type/source separately for the household member.

- 1. Verification The document upload replaces the verification data entry.
- Enter an HE+ System Note when additional clarification is needed. CARES records and bank statements may be used to verify the receipt of Social Security Administration income types.



- 3. All income must be entered and verified even if the household appears to be over income. If all the income information is not provided and verified, the application is incomplete and should be left "Pending." Enter an HE+ System Note to describe what is missing.
- 4. Income types with zero income for the test period should not be entered as income unless it is self-generated income verified by taxes.

Refer to Appendix B for more information on income types.

#### 3.4.27.1 Zero Income

A zero-income household has no sources of income either earned or unearned in the test period. This includes a household that has only ignored income (see Section 2.3.9).

A household is not zero-income when:

- The household has countable income to report.
- The only countable income in the household is self-generated income (SE) and the business operated at a loss. Enter SE as the income type and zero for the income amount. This is the only income type that should be entered with zeroes for the test period.
- The household has any other income resulting in a negative amount for the test period, such as child support paid.

If the household is determined to be zero-income, see subsequent Sections 3.4.27.2 and 3.4.27.3 for requirements of self-certification, the Zero Income Form, and interactive application requirements.

When households report zero income, follow-up with the customer is required to complete the application, unless the application was processed in-person or via phone. See Section 3.4.27.2 regarding how to proceed if a paper application is received for a zero-income household.

#### 3.4.27.2 Self-Certification for Zero Income Households

If a zero-income household is unable to provide third-party verification of an ignored income source (see Section 2.3.9), and after all other avenues of documenting income eligibility are exhausted, self-certification by completing the Zero Income Form (ZIF) is allowable. Agency staff shall enter HE+ System Notes that state the various attempts of obtaining third-party verification.

## Third-party verification:

Ignored income shall not be entered into the HE+ System as an income record but noted in HE+ System Notes. Examples of third-party verification include:

- <u>Student Income</u> Loan/Grant Award letter/statement
- Kinship Care View check stubs or CARES

If third-party verification is provided of an ignored income source for a zero-income household, agency staff shall upload the verification into the HE+ System under "Zero Income". That verification is sufficient for the ZIF document upload requirement; while the worker may ask the customer to complete a ZIF, it is not required.



#### Self-certification:

If the household is self-certifying as a zero-income household, the following procedures are suggested:

## 1. Mailed applications

If a zero income mailed application is received, the worker shall:

- a. Enter the mailed application into the HE+ System as an incomplete application until the interaction takes place
- b. Enter HE+ System Notes stating the application is "Pending" for customer interaction
- c. Contact the customer to confirm income information and to ensure the Zero Income Form (ZIF) has been fully completed and submitted
  - i. If unable to reach the customer send an Incomplete Notification/Notice informing the customer to contact the agency
- d. Change the "Outreach Type" to phone or site where the interaction took place
- e. Enter HE+ System Notes stating that the phone interaction was completed and enter any missing ZIF information

## 2. Outreach applications

If a zero-income application is received at an outreach/alternate site, the worker shall:

- a. Date stamp and indicate the outreach site at the top of the paper application
- b. Contact the customer to confirm the income information and to ensure the ZIF has been fully completed and submitted
  - i. If unable to reach the customer send an Incomplete Notification/Notice informing the customer to contact the agency
- c. Enter the application into the HE+ System as an incomplete application until the interaction takes place
- d. Enter HE+ System Notes stating the application is "Pending" for customer interaction
- e. Change the "Outreach Type" to phone if the interaction did not take place at the outreach/alternate site
- f. Enter HE+ System Notes stating that the interaction was completed and enter any missing ZIF information

#### 3. Online applications

If a zero-income application is received online, the worker shall:

- a. Validate the application and create an HE+ Application in the system
- Contact the customer to confirm income information and to ensure the ZIF has been fully completed and submitted
  - i. If unable to reach the customer send an Incomplete Notification/Notice informing the customer to contact the agency
- c. Keep the application in "Pending" status until contact has been made and the zero-income information is confirmed



- d. Despite making contact with the customer, keep the outreach type as "Online"
- e. Enter HE+ System Notes explaining the interaction is required and/or completed. Any missing ZIF information shall be entered into HE+ System Notes.

#### 3.4.27.3 Use of the Zero Income Form

A Zero Income Form (ZIF) shall be completed by each adult household member when the household is determined to be a zero-income household (has no sources of income either earned or unearned). See Section 3.4.27.1 for more information on zero-income households. The agency must retain a copy of the completed ZIF as a document upload to the application in the HE+ System.

The form shall be completed in its entirety to be accepted as verification of how the household is meeting basic living expenses including complete contact information of the individual(s) assisting with monthly expenses. The form should adequately explain how basic living expenses (shelter, heat, utilities, and basic living needs) are being met on a continued basis. WHEAP agencies should follow up with the individual(s) listed on the ZIF if the form is incomplete or additional information is needed and document, in an HE+ System Note, the follow-up that was completed.

WHEAP agencies shall use the Division-created ZIF, which can be found on the Division website (https://energyandhousing.wi.gov/) under Provider Resources > Energy > Energy Assistance > Forms. The ZIF may be used as written verification of any gift income the customer has received during the test period. Self-declaration of the gift income amounts is allowed. HE+ System notes are required for self-declared gift income amounts. A written or verbal statement from the gift giver may also be used as verification. The use of the ZIF is optional in other situations at the agency's discretion, as a tool to ensure accurate processing of an application.

## 3.4.28 Energy Fuels (Fuel Page)

The fuel page is intended to collect information about fuel use and payment responsibility. It is important to correctly complete all the fuel entries as they can have an influence on the amount of the benefit.

Fuel information is required on all applications, including those for over-income households.

### 3.4.28.1 Basic Fuel Page Rules

- 1. In order for an application to be complete, the electric information needs to be provided. If an applicant does not have electricity in their home, an application can be entered without an electric energy fuel. The worker must make the appropriate selection in the HE+ System to indicate there is no electricity in the home. There must be documentation in HE+ System Notes explaining why no electric fuel type was entered.
- 2. In order for an application to be complete, there must be a primary energy fuel (heating) selected.

### 3.4.28.2 Primary Heating Fuel

Each applicant may only report one primary fuel type. If the applicant has more than one heating source, the applicant and the agency need to determine which fuel type the applicant uses the



most to heat the residence.

In choosing between fuels to declare as the primary heating fuel, consider the following:

- When there are two heating units, consider which fuel actually supplies 50% or more of the household heat.
- When there is a farmhouse or outbuildings, there is generally a separate tank and account from the home.
- Consider the primary heating unit of the dwelling. The primary heating unit declared on the application affects weatherization services available for this dwelling.
- Should there be a furnace failure, furnace service is only available for the primary heating
  fuel. When the dwelling is audited for weatherization services, only the primary heating type
  identified on the application is included in the audit assessment.
- Selecting "wood or other", without a vendor will result in the eligible applicant receiving a single party check and means the household will not be eligible for any heating Crisis Assistance. An HE+ System Note must be added to identify the fuel type. "Other" fuel types include corn pellets, other bio-fuels (corn stalks, etc.), or kerosene.

A household may not change the primary fuel type on the application after the benefit has been paid.

## 3.4.28.3 Energy Fuel Type

Click on the drop-down menu to select the type of fuel that is used for heating and non-heat electric in the house. If an applicant cannot tell the WHEAP agency what fuel type they use, the application should remain in "Pending" status until the applicant notifies the agency of the fuel type. If the applicant does not provide the fuel type to the agency within 30 days, the application will be denied.

Wood pellets and wood chips should be entered as "wood or other". When selecting "wood or other" as a fuel type, an HE+ System Note must be added to identify the fuel type if the fuel type is not wood. "Other" fuel types include corn pellets, other bio-fuels (corn stalks, etc.), or kerosene.

If an applicant does not have a relationship with a utility for electrical service, they will not be eligible for an electric benefit. If the only source of electricity is from solar cells, wind power, an extension cord, or a generator, no fuel record shall be entered into the HE+ System and the worker shall select "No" for the "Has Electric Provider" field. An explanation shall be included in System Notes as to the reason for this selection.

## 3.4.28.4 Payment Method

Select how the applicant pays for their home heating costs.

Directly pays the bill sent from the energy provider. This choice coupled with the vendor
information and the account information will lead to a payment being made to the vendor
for the eligible applicant's account. For non-heating electric, the applicant is eligible for a
PB benefit only if the vendor is a participating PB vendor. If they are serviced by a nonparticipating PB vendor, they are directed to contact the electric vendor for participation in
that vendor's Commitment to Community program.



- When applicants prove they pay their own heating costs, but do not provide documentation
  of the costs at the time of application, leave the application in "Pending-Unextracted"
  status. Obtain the applicant's dated signature on the Certification Page to obtain permission
  to contact the vendor to gather the fuel costs on behalf of the applicant. If the worker is still
  unable to gather the costs, process the application with "zero" fuel costs. An HE+ System
  Note is required to explain the reason for the "zero" cost entry.
- Rental payment includes energy costs in the monthly rent payment and the household does
  not receive rental assistance. This choice will result in a check being issued to the eligible
  applicant based on a proxy amount for the heat/electric costs. For non-heating electric
  costs, the applicant is eligible for a PB benefit only if the vendor providing electricity to this
  dwelling is a participating PB vendor.
- Separate payment is made to the landlord, mobile home park owner, or no direct account
  with a vendor. This choice will result in a check being issued to the eligible applicant based
  on a proxy amount for the heat/electric costs. For non-heating electric costs, the applicant
  is eligible for a PB benefit only if the vendor providing electricity to this dwelling is a
  participating PB vendor.
- Do not pay. Energy included in the monthly rent when residing in government-assisted housing, renters who pay neither rent nor heating/electric costs because of an in-kind rental arrangement, or renters who do not have a direct pay relationship and do not make any payment toward the energy cost(s) per the lease/rental agreement.

This choice will result in **no** benefit being provided to the applicant, because they do not have an energy burden.

Applicants are required to provide verification for the following payment methods and the means of verification must be indicated in HE+ System Notes:

- Heat and/or non-heating electric included in rent,
- Separate payment is made to the landlord, mobile home park owner, or no direct account with vendor, or
- Do not pay

Verification may include, but not is limited to:

- Observation of a lease or rental agreement,
- Observation of utility allowance on Form 50058 or Form 50059
- Verbal contact with the landlord, or
- In some cases, the heating vendor can verify if heat is included.

NOTE: Observation of previous years' information is no longer an acceptable form of verification and new verification must be obtained.

NOTE: For multi-unit buildings, the agency may obtain information from the landlord/management company verifying that all units have heat and/or electric included in rent, a separate payment is made to landlord, or are do not pay. This verification may be used for all units within the building and must be obtained on an annual basis. The means of verification must be indicated in HE+



System Notes.

#### 3.4.28.5 Vendor Information

You can view vendor information by accessing the "WHEAP Vendor Details" Report. Enter either the vendor name or number in the "Vendor" search criteria and select the desired vendor(s) to view information for.

You may enter the first few letters of the vendor name or the first few numbers of the vendor number. This will pull up all active vendors that match the criteria.

All vendors are "**Direct Vendors**" and an applicant's benefit will be sent directly to their designated vendor. If an applicant is using a vendor who is not currently registered with the program, the agency must register the supplier, assist the applicant with locating a registered vendor, or arrange for an alternate payment method.

#### 3.4.28.6 Account Number

Enter the account number from the applicant's fuel bill. You must enter information into this field when payment method is "Directly pay the bill from the energy fuel supplier." The account number entered must have a service address that matches the residence address of the household. Account numbers are important as they are the primary identifier the vendor uses to post benefits to an applicant's account.

- 1. If the vendor uses account numbers and the applicant or vendor cannot provide the number, leave the account number blank and leave the application "Pending" until the numbers are provided. The case will be denied if the information is not provided within 30 days.
  - Some vendors have a required account number format to be used when entering account numbers—this format will appear once the vendor has been selected. The vendor's format must be used.
- 2. If the vendor does not use account numbers, enter "none."

  If the vendor uses the account name as the account number, enter the account name.

#### 3.4.28.7 Annual Fuel Cost

The HE+ System will not accept a fuel cost over \$7,000. The worker shall indicate in HE+ System Notes when they receive the HE+ System prompt that costs cannot exceed \$7,000. HE+ System Notes shall indicate what may be the cause of the high fuel costs.

1. Actual fuel costs are preferred.

Any actual fuel costs available from the last 12-month time period from the date of application or from the prior heating season should be entered as the annual fuel usage. When a full 12 months of usage is not available, HE+ System Notes shall indicate how many months of usage this covers and why 12 months of usage is not available.

NOTE: If the customer recently moved to the address listed on the application, ask the energy provider for prior usage costs for the residence address. Prior costs shall be used for actual fuel costs.



When entering the actual fuel costs for a duplex, it is important to correctly note if there is a shared furnace/electrical meter as this will determine whether the actual fuel usage or the proxy fuel usage is used to calculate the benefit.

When an applicant has used more than one vendor for deliverable fuel, costs from all deliverable vendors shall be added together to obtain the annual fuel cost when the applicant is able to provide receipts or obtain costs from each vendor. If cost information is not available from all vendors, enter the costs available and document in HE+ System Notes why this is not the full annual costs.

- 2. Annual budget amounts may be used when the complete prior 12 months or last year's heating season usage is not available. Remember to convert any monthly budget amount to an annual amount by multiplying by 12.
  - NOTE: An applicant's monthly payment cannot be used as a budgeted amount; budget must be provided by the vendor.
- 3. Enter "0" when the fuel costs available are not accurate or the budget amounts for utility fuels are not available and document in HE+ System Notes why "0" was entered. This does not mean there are no fuel costs, but rather that no information was provided. Benefit(s) will be calculated by using information taken from the proxy table of average costs for the type of dwelling and fuel (proxy fuel costs).

Enter "0" for the cost in the following situations:

- a. When actual usage, including budget amounts, are not available;
- b. If there is an unusual energy use on the account such as a swimming pool, hot tub, or spa.

The Wisconsin Energy Fuel Information (WEFI) web service is a data validation function used to confirm direct pay electric or natural gas account numbers for the investor-owned utilities (IOUs), which include Alliant, MG&E, Xcel, WPS, and We Energies. Review the data returned by WEFI web service for accuracy prior to adopting the cost data into the fuel page. WEFI web service will return all available cost and consumption data for the application address for 12 months prior to the application date if the account is active on the day of the web service call. If more than 12 months of WEFI results are displayed, only enter the most current 12 months of costs. WEFI results may also include the date service was opened and current balance, depending upon the results available from each utility. WEFI web service will not provide cost or consumption data for closed accounts. For a closed account, obtain the annual costs from the utility and manually enter the cost data if the reason for a closed account is known.

Any discrepancies between the WEFI results and the information entered on the application shall be reviewed with the applicant and the results documented in HE+ System Notes.

### 3.4.28.8 Account Name and Household Relationship

If the person whose name is on the account is a non-household member, select whether the person is a deceased spouse, protective payee, or "Other".



If selecting "Other", the relationship of the individual may be entered directly into the HE+ System "Account Name" field after the account holder's full name or an HE+ System Note shall be added to state the relationship of this individual to the household.

If the account is not current or active because it has been closed, the agency needs to assist in getting a current account established.

- If the account is closed because the applicant has moved, the application will be incomplete until a relationship can be established.
- If the account is closed because the applicant is not current with their payments and the applicant has not moved or otherwise changed vendors, the agency can use the closed account information on the application until current account information can be obtained.

### 3.4.28.9 Enter Name on the Account

If the person whose name is on the account is a household member, select the name from the drop-down list. If the name on the account is a deceased spouse, a protective payee, or "Other" (non-household member), select the matching option from the list and then enter the name in the space provided.

If selecting "Other" (non-household member), the relationship of the individual may be entered directly into the HE+ System "Account Name" field after the account holder's full name, or an HE+ System Note shall be added to state the relationship of this individual to the household.

#### 3.4.28.10 Shared Meter

If there is more than one unit on the meter and it is not operating as a business, select "Yes" for shared meter and add an HE+ System Note to explain with what additional dwelling the meter is shared. Examples of shared meters include situations where both units in a duplex have usage recorded on one meter; where the electricity is provided to a "granny flat" from the meter for the main house; or where electricity is provided to a nearby home through an extension cord from another residence. Shared meter also applies to an outbuilding on the property that has more than a negligible impact on the household's energy usage.

If the building(s)/dwellings(s) that share the applicant household's meter have low or no usage, or the situation is unclear, contact the HE+ Help Desk for additional guidance.

NOTE: If there is more than one unit on the meter and one of them is considered a business, select "Yes" for business use and add an HE+ System Note stating what type of business is on the same meter. Although the applicant may not directly operate or own the business, because their costs are recorded on one meter, business use on the meter still applies. Examples of business use include an applicant living in a home on the same property as an operating farm or in an apartment above an operating business. Residential rental property is not considered a business for business use purposes; select "Yes" for shared meter if a landlord shares a meter with their tenant.

In both situations, the applicant will receive a benefit based on a proxy amount for the heat/electric costs.



#### 3.4.28.11 Business Use on the Account

Use the following tests to determine if there is business use on the account:

1. Does the business occur in the home or other areas on the property where business usage is recorded on one meter? If so and the business activity likely has an impact on the home energy use, select "Yes" for business use on the account.

NOTE: If the business that primarily occurs in the home has little impact on the home energy use, select "No" for business use on the account and document this in HE+ System Notes. Examples would be occasional babysitting, working from home for a job that would otherwise take place in the employer's office, or producing crafts/homemade goods for sale without the use of equipment that increases the home's energy use.

NOTE: Business use on the account is to be marked "No" if self-employment business is no longer in operation or currently inactive based on application test period.

If no, continue to #2.

- 2. Does the applicant see customers in their home or are there other areas on the property that operate as a business either by the applicant or the landlord? If so, select "Yes" for business use on the account. If no, continue to #3:
- 3. If self-generated income is operated entirely in a separate location, or has very little activity in the home or other areas on the property, and fails the previous two tests, select "No" for business use on the account in the Energy Usage section of the HE+ Application; the actual fuel usage is used to calculate the benefit. Examples of self-generated income which generally have very little activity in the home are: cleaning services, home party sales, lawn care, snow removal, rental, construction, carpentry, and scrapping metal.
- 4. If the situation is questionable, indicate in HE+ System Notes the answers the applicant provided to the aforementioned tests. If you have a different situation or you are uncertain if there is business use on the meter, please contact the HE+ Help Desk for assistance in determining if there is business use.

In the case of an applicant living on a property that includes an operating farm, see Section 3.4.28.10 to determine the meter type.

An HE+ System Note shall be added describing the source of the income (self-generated or otherwise) and what test was used to determine business use or no business use on the meters.

NOTE: See Section <u>3.4.19</u> for information on counting the number of rooms.

### 3.4.28.12 Non-Heating Energy Costs

Use the same procedures as for the primary heat source, using the actual vendor number for non-heating electric vendor.

Households without an electric burden must have documentation in the HE+ System Notes. Specify why an electric burden does not exist for the household; this includes households that do



not have electric service.

# 3.4.28.13 Additional Energy Questions

The additional energy questions are required for an application to be complete. The answers to these questions have no effect on the potential benefit amount.

# 3.4.29 Applicant Signature Date

Enter the date the applicant signed the Certification Page. The date the applicant puts on the Certification Page is the date that should be entered. If the Certification Page is received with a signature, but no date, use the date the application/Certification Page was received as the signature date and indicate in an HE+ System Note that the applicant did not date the Certification Page.

The date the applicant submits the online application is the date that is entered on the application by the HE+ System.



# **Chapter 4 | Emergency Crisis and Prevention Assistance**

## 4.1 Introduction

Applicants are not entitled to any Emergency Crisis or Prevention Assistance benefit. Emergency Crisis and Prevention Assistance are intended to provide emergency and/or prevention assistance services to assist applicants with substantial home energy needs.

- 1. Each local agency shall respond within 48 hours of the request for Emergency Crisis Assistance and/or Prevention Assistance, and within 18 hours when there is a potentially life-threatening situation.
- 2. Each local agency shall grant the minimum amount needed for the customer to prevent and/or restore an energy loss. See Section <u>4.2.1.2</u> for more information.
- 3. Benefits for LIHEAP and Public Benefit emergency crisis and prevention assistance are paid from a central account managed by the Division.
- 4. Emergency Crisis Assistance is intended to deal with "no heat/energy" situations during the heating season (October 1 to May 15).
- 5. Prevention Assistance may be provided to resolve a wide range of home energy related problems.
- 6. Emergency Crisis and Prevention Assistance benefits are paid only to providers of goods or services. There is no reimbursement for action taken or expenses incurred by vendors prior to approval by the local WHEAP agency.
- All Emergency Crisis and Prevention Assistance payments must be completed by the last extraction of the program year (normally September 30). Any Emergency Crisis or Prevention Assistance agreement not completed by the last extraction will deny.
- 8. Minimum Emergency Crisis and Prevention Assistance payments, including copayment releases, shall be \$30. All Crisis Assistance payments shall be rounded down or up to the nearest dollar. No cents may be entered for Emergency Crisis or Prevention Assistance payments.
- 9. Agencies shall not require customers to have a disconnection notice before providing Emergency Crisis or Prevention Assistance.
- 10. Agencies shall not implement additional eligibility guidelines, Crisis Plans, and/or spending thresholds that deviate from Section 4.2.1.2 without approval from the Division.

## 4.2 Emergency Crisis and Prevention Assistance Eligibility

## 4.2.1 General Eligibility Guidelines

To be eligible for any Emergency Crisis and/or Prevention Assistance, households must:

- 1. Meet the WHEAP non-financial eligibility criteria; and
- 2. Have a direct pay relationship with a participating energy vendor. Applicants without a direct pay relationship are not eligible for Emergency Crisis or Prevention Assistance benefits.



To be considered for Emergency Crisis or Prevention Assistance, applicants <u>must</u> have had eligibility determined by having completed an HE+ Application at any time during the current program year. If an applicant is deemed eligible for the current program year, the eligibility applies for the entire program year for any Emergency Crisis or Prevention Assistance services. If the household composition has changed since the HE+ Application was completed, a new HE+ Application shall be created in order for the household to apply for Crisis Assistance.

If an HE+ Application denies as over-income, there is no income eligibility exception for Crisis Assistance. If the household is over-income based on the prior month test period **and** there has been a change in the household's financial circumstances, the HE+ Application may be processed using the present month income as described in Section 2.3.2. If the household is financially eligible based on the present month income, they are eligible for Crisis Assistance or HE+ Program Services. If the household's financial circumstances have changed and there is an existing application from earlier in the program year that denied as over-income, a new HE+ Application shall be processed to determine current financial eligibility.

For applicants who have not applied during the heating season, eligibility <u>must</u> be determined by completing an application. The applicant will be denied a heating and/or an electric benefit because it is outside the program dates, but the applicant <u>may</u> be eligible for Prevention Assistance if the applicant is otherwise eligible for energy assistance.

## 4.2.1.1 Denial of Emergency Crisis or Prevention Assistance Benefits or Services

Eligible households may be denied Crisis Assistance because of:

- the weather,
- assets of the household,
- failure to make payments on their energy bills,
- having previously received Crisis Assistance twice during the program year.
- having received \$1,200 combined total in Emergency Crisis and Prevention Assistance\*,
- the applicant's situation is not an emergency.

Prevention Assistance benefits or services may be denied for reasons other than the determination of eligibility and should not be confused with denials of eligibility for Emergency Crisis. A worker may deny Prevention Assistance in the HE+ System by selecting one of the grantee denial reasons, which also prompts the HE+ System to generate a denial letter with the text of the denial reason the worker chooses.

If the household is ineligible for Prevention Assistance, the agency must notify the customer of the denial within 48 hours of the request for Prevention Assistance. An HE+ System Note must be created to state that the customer requested Prevention Assistance and was denied, with an explanation for the denial.

<sup>\*</sup> Agencies may submit a waiver request to the HE+ Help Desk to exceed \$1,200 in crisis benefits or more than two WHEAP crisis benefit payments per program year.



# 4.2.1.2 Emergency Crisis and Prevention Assistance Amount

Agencies shall work with customers to determine the minimum amount needed to prevent and/or restore an energy loss. The preapproved range to alleviate the crisis situation is \$30 to \$600 for LIHEAP Emergency Crisis and \$30 to \$350 for Public Benefit Crisis. The Division may change this preapproved range in response to funding availability or for specific initiatives. The maximum amount allowed for deliverable fuel requests is the minimum fill plus trip charge (when applicable). The maximum amount for natural gas and electric requests is the utility's required down payment to prevent a disconnection and/or restore service. The worker must document, in HE+ System Notes, the requirement for each crisis request. If an exception is needed to the benefit limit, submit a request for an exception to the Division via the HE+ Help Desk.

## 4.2.2 Emergency Crisis Eligibility – Additional Guidelines

To qualify for Emergency Crisis Assistance the household must have no heat or be facing an imminent loss of essential home energy. Each local agency has latitude in the type of assistance to provide and the amount of assistance to provide within the preapproved range to address the emergency situation.

Households must have paid at least \$25 on their associated energy bill in the previous three (3) months to be eligible for any heating or electric related Emergency Crisis payment on the associated bill. This contribution may be from another non-WHEAP assistance program.

If the HE+ Application is waiting for SSN verification from SSA but is otherwise complete, Emergency Crisis Assistance may be issued by requesting a crisis override that is associated with a "Pending" or "On-Hold" application. This should only be requested for households experiencing actual or imminent loss of essential home energy during the heating season. The worker shall notify the applicant that they are responsible for repayment if any SSN on the HE+ Application cannot be verified (resulting in the application being incomplete).

## 4.2.2.1 Cooling Eligibility - Emergency Crisis

Emergency services for cooling are provided during the summer months only in cases of extreme heat, with a declaration of a heat emergency, <u>and</u> approval from the Division. Agencies may not implement cooling assistance unless a state or local public health official declares a heat emergency <u>and</u> authorization is given from the Division.

# 4.2.3 Prevention Assistance Eligibility – Additional Guidelines

To qualify for Prevention Assistance the household must have heating costs beyond their ability to pay after the heating assistance benefit. This may be due to excessive energy bills, unreasonable percentage of income required to pay for energy, etc. A brief summary provided in the HE+ System crisis application "Customer Request Reason" or an HE+ System Note is required to identify the reason for the Prevention Assistance. When targeting households for Prevention Assistance, agencies must contact the customer to verify they are still residing in the home and to verify with the vendor that the account is active and that customers have met their customer contribution.

Households must also have paid at least \$25 on their associated energy bill in the previous three (3) months to be eligible for any heating or electric related Prevention Assistance payment on the



associated bill. The household contribution may not come from another assistance program (such as KWWF, Salvation Army, Catholic Charities, etc.).

A household may be eligible for Prevention Assistance if their application for Regular Benefits is denied solely because:

- The application for energy assistance was submitted outside of the program dates for heating assistance, or
- The application was found ineligible for Regular Benefits only because a household member was a paid case head in another WHEAP household during the current heating season, or
- The application contains denial of Regular Benefits because benefits were already received this heating season.

## 4.2.4 Exceptions to the Applicant Contribution Requirement

The Division may grant a special exception to the minimum requirement for an applicant to have paid \$25 in the past three (3) months to receive Crisis Assistance.

The local WHEAP agency must request the special exception and be prepared to identify several of the following circumstances to support the request for an exception:

- The low level of income available to the household;
- The presence of vulnerable individuals in the household;
- The absence of other housing options to use until the emergency is abated;
- Cold temperatures are expected for the near future; high temperatures for the next 72 hours are not expected to exceed 25° F;
- The household has no other resources to draw upon; and/or
- The combined total amount of Emergency Crisis Assistance and Prevention Assistance benefits paid to the household to date does not exceed \$1,200.

HE+ System Notes must be entered to describe which circumstances justify granting the exception to the household.

## 4.3 Emergency Crisis Assistance

Emergency Crisis Assistance is intended for households experiencing actual or imminent loss of essential home energy during the heating season.

### 4.3.1 General WHEAP Agency Responsibilities

1. The WHEAP agency must respond to requests for Heating Emergency Services and Cooling Emergency Services if a cooling emergency is authorized, within 48 hours. If the situation is life threatening because the weather or other conditions create a concern for the health or life of the household's residents, the agency must respond within 18 hours. If the service date entered in the HE+ System is beyond 48 hours from the request date, an HE+ System Note shall be added to state when the customer was contacted after the request, to address the crisis situation.



- 2. The WHEAP agency must conduct **outreach** and public information activities to ensure people are aware of the program and how to obtain assistance.
- 3. The local WHEAP agency must establish a way for emergencies to be reported outside of office hours. This may be a telephone number currently in existence. For numbers outside the WHEAP agency (sheriff, 911, etc.), there must be written procedures for coordination between the WHEAP agency and the other resource. These procedures must include methods for information collection and follow-up procedures that are agreed to by all parties. This number must be published and available to applicants throughout the service area.
- 4. The WHEAP agency must identify a person(s) within the agency to assess referrals from fuel suppliers, utility Early Identification Programs (EIP), state or county **Weatherization**Operators, and/or other local agencies.
- 5. The WHEAP agency shall develop agreements with local fuel suppliers. This includes wood dealers, and other vendors supplying energy related services. The agreements must ensure a response to fuel emergencies, including those that occur outside of office hours.
- 6. The WHEAP agency must establish agreements with non-regulated utilities and deliverable fuel dealers (that are registered WHEAP fuel vendors serving households in the agency's area) to notify the WHEAP Coordinator or other designated staff person of all households who have been refused delivery.
- 7. The WHEAP agency must establish a method for the utilities suppliers and heating contractors to easily report fuel emergencies.
  - The WHEAP agency must establish a method to follow up on utility disconnects during the heating season. Agencies must have agreements with local regulated utilities regarding procedures to be followed in the event of an actual disconnect.
- 8. Before providing an Emergency Crisis benefit for a deliverable fuel customer, the WHEAP agency must contact both the customer and the vendor to confirm that the customer has not moved, is not deceased, and has an active account with the vendor.
- 9. The WHEAP agency must establish procedures with the Weatherization agency to ensure response within 72 hours for heating unit emergencies.
- 10. Agency staff are required, for each crisis occurrence, to enter an explanation in HE+ System Notes or in the "Customer Request Reason" explaining the circumstances of the crisis and how the crisis service will assist the applicant.

#### 4.3.2 Emergency Crisis Assistance

When the agency is notified (either by an applicant or by another party) that a household has no heat or is facing the imminent loss of essential home energy, the agency shall determine whether there is a threat to health or safety. The agency shall also determine whether the circumstances are life threatening in assessing what measures to take.

- The response must protect the health and safety of the household members and alleviate
  the emergency. After the emergency is dealt with, agencies should assess an applicant's
  situation by using preventive services to continue to work with applicants to avoid future
  crisis situations.
  - Agencies should include the following criteria in their determination of action(s). Keep in



mind the relationship of each factor with the other three.

- a. Expected low temperature during the period before the next working day,
- b. Condition of the dwelling unit (i.e., is it habitable, is the furnace operable, mobile home, apartment, etc.),
- c. Alternatives available to the household (i.e., temporary relocation, other resources, etc.).
- 2. Agencies must determine the most appropriate and cost-effective solution to the emergency. Agencies must include in their array of services the following benefits for emergency services:
  - a. Provision of the minimum amount of benefits needed to address the immediate emergency, or
  - b. Provision of temporary shelter for households experiencing emergencies.

Examples of how to address an emergency include:

- a. A telephone call to the heating or electric supplier to guarantee a payment,
- b. Relocation of the household (temporary or permanent),
- c. Provide heating unit repair or replacement, when appropriate through the Furnace Program (see HE+ Program Services Manual),
- d. Any other action or combination of actions that will at least address the emergency and protect the safety of the applicant (provision of blankets or temporary use of space heaters), or
- e. Agencies may pay a portion of a household's non-heating electric bill using federal LIHEAP funds or State Public Benefit (PB) funds for customers of participating vendors.
  - If a customer is eligible for LIHEAP, but not eligible for PB benefits because their
    electric vendor does not participate in the PB program, the customer may
    receive LIHEAP Crisis Assistance for their non-heating electric service.
  - If a customer is eligible for PB benefits, the customer may receive LIHEAP Crisis Assistance even if the household is not LIHEAP eligible.
- 3. If the heating system is not working, agencies may address this problem through the Furnace Program. Repairs or replacements are only allowed to be done on the heating unit using the primary fuel type reported on the HE+ Application. If the customer's water heater is leaking or otherwise not operating properly, or they have a leaky faucet, toilet or other fixture, agencies can refer the household to the Water Conservation Program. For more information about the Furnace and Water Conservation Programs, see the HE+ Program Services Manual.

#### 4.4 Prevention Assistance

Prevention Assistance services are non-emergency services designed to assist households to pay for current home energy costs, establish self-sufficiency practices, help decrease arrearages, maintain service, or assist with connection fees to enable the applicant to obtain utility service to move into housing.



# 4.4.1 General WHEAP Agency Responsibilities

The WHEAP agency must respond to customer requests for Prevention Assistance services within 48 hours of the request date. If the service date entered in the HE+ System is beyond 48 hours from the request date, an HE+ System Note shall be added to state when the customer was contacted after the request to address the crisis situation.

Agencies must have the capacity to provide the following Prevention Assistance benefits and services:

- Prevention Assistance payments, including copayment agreements and/or match payments with applicants; copayment agreements and match payments must be completed by September 30 (end of program year), and
- Budget counseling and money management services, and
- Energy conservation training, counseling, etc.

Agencies must contact the customer before issuing Prevention Assistance benefits to ensure that the customer is still residing at the address on their regular application as well as contacting the vendor to verify that the account is still active. Customers are still required to meet the customer contribution for Prevention Assistance and must be verified with the vendor.

### 4.4.2 Prevention Assistance Services

WHEAP agencies are encouraged to develop criteria to be used in assessing need for Prevention Assistance services:

- a. Has experienced one or more emergencies during the current or past heating season, or
- b. Have home energy bills that are beyond the household's ability to pay after the heating and non-heating assistance benefit and, if appropriate, utility allowance, is taken into account. This may be due to excessive energy costs, unreasonable percentage of income required to pay for heat, high medical bills, loss of income, or other extenuating circumstances, or
- c. Has demonstrated an effort to pay bills through better budgeting and attempts to control energy use.

# 4.5 Crisis and Prevention Assistance Applications

Remember the following items when entering Emergency Crisis or Prevention Assistance applications in the HE+ System:

- 1. Review the data brought forward from the application. Correct any information that has changed from the original application.
- 2. Select the appropriate crisis code. Do not use Emergency Crisis codes for Prevention Assistance activities. Emergency Crisis Assistance is only for households experiencing actual or imminent loss of essential home energy during the heating season. A full list of crisis codes and a description of each code is in Section 4.6.1.
- 3. The Request Date is the date the customer requested assistance, and the Service Date is the date the agency responded to the Crisis or Prevention Assistance request.



- 4. For the vendor entry, any applicants with an account with an investor-owned utility (IOU), which includes Alliant, MG&E, Xcel, WPS, and We Energies, are subject to a Wisconsin Energy Fuel Information (WEFI) web services call to confirm the account status. Use of the WEFI web service is required on all Emergency Crisis and Prevention Assistance applications with IOU accounts.
  - The WEFI web service is a data validation function used to confirm direct pay electric or natural gas IOU account numbers. Review the data returned by the WEFI web service for accuracy prior to accepting the results of the call. Any discrepancies between WEFI results and information entered on the application shall be reviewed with the applicant and the results documented in HE+ System Notes.
- 5. When paying Crisis Assistance on a closed account, the HE+ System provides a field for entering notes. The worker shall document in this note section why Crisis Assistance is being paid on a closed account and have coordinated this, in advance, with the vendor.
- 6. Verify that the account name and account number is accurate and current.
- 7. Explain the circumstances of the crisis and how the crisis service will assist the customer in an HE+ System Note or in the "Customer Request Reason" field.



### 4.6 Crisis Codes

# 4.6.1 Crisis Code Quick Reference

The following table provides codes used in the HE+ System for Crisis Assistance.

Table 4.1: Crisis Code Quick Reference

Code Type	Code Category	Code
PAYMENT	Emergency LIHEAP	PEAS
	Prevention LIHEAP	PPAS
		SCCC
		SPAS
		SPSF
	Emergency Public Benefit	PBES
	Prevention Public Benefit	PBAS
		SPBC
		SPBS
PROGRAM SERVICES	Furnace Program	SFAS
		SFRR
		SFRT
	Water Conservation	H2ORT
		H2OAS
SERVICE (Additional Services)	LIHEAP Services	SADV
		SLBC
		IOTG
		IOTN
	Non-WHEAP Payments	NFPO
		NKWF

# 4.6.2 LIHEAP Funded Payment Codes

Service codes beginning with a letter "P" indicate a Crisis or Prevention Assistance payment made by the HE+ System using LIHEAP benefit funds. All payment codes require entry of account number, account name, amount, and vendor number.

**PEAS – LIHEAP Emergency Payment** 



Emergency Crisis Assistance payment to a fuel supplier resulting in the delivery of fuel or a continuation of utility service.

## **PPAS – LIHEAP Prevention Assistance Payment**

Prevention Assistance payment sent to fuel suppliers/utilities. Payment may also be sent to a vendor for repairing or replacing fuel oil and LP tanks and/or lines.

## **SCCC – LIHEAP Prevention Assistance Copayment Contract**

Total amount of the copayment agreement developed and agreed to by the applicant and fuel supplier using LIHEAP benefit funds. A copy of a signed agreement must be uploaded into the HE+ System. Agency enters the total copayment agreement amount. This code reserves funds. Payment is made upon release of the reserved funds.

## **SPAS - LIHEAP Match Payment**

A short-term agreement of one payment requiring a customer contribution prior to release of LIHEAP benefit funds. This code reserves funds. Payment is made upon release of the reserved funds. No written copayment contract is necessary.

# **SPSF – Summer Fill Payment**

Prevention Assistance code used specifically for a Division-directed Summer Fill Program and only available during specified program dates.

# 4.6.3 Public Benefit Funded Payment Codes

Service codes beginning with the letters "PB" indicate a Public Benefit Crisis or Prevention Assistance payment made by the HE+ System using Public Benefit funds. Local agency staff enters "PB" codes. The household's electric vendor must be participating in the State's Public Benefit program. All payment codes require entry of account number, account name, amount, and vendor number.

#### **PBAS – Public Benefit Prevention Electric Payment**

Public Benefit Prevention Assistance payment to a Public Benefit electric supplier as a **single** payment. No copayment contract is involved.

#### PBES – Public Benefit Emergency Electric Payment

Public Benefit Emergency Crisis Assistance payment to a Public Benefit electric supplier resulting in restoring electric service or continuation of electric service.

# SPBC – Public Benefit Copayment Contract

Total amount of the copayment agreement developed and agreed to by the applicant and electric supplier using Public Benefit funds. A copy of signed agreement must be uploaded to the HE+ System. Agency enters the total copayment agreement amount. This code reserves funds. Payment is made upon release of the reserved funds.

## **SPBS - Public Benefit Match Payment**

A short-term agreement of one payment requiring a customer contribution prior to release of Public Benefit funds. This code reserves funds and reduces the available balance amount of the local agency's Public Benefit funds. Payment is made upon release of the reserved funds.



No written copayment contract is necessary.

## 4.6.4 Program Services Codes

Program Services payments come from two separate central funds to pay all furnace and water conservation activities throughout the state. See the HE+ Program Services Manual for information on eligibility, allowable activities, and other requirements for furnace and water conservation services.

The following three codes are used for furnace applications:

### **SFAS – Furnace Assessment**

Used to issue payments to vendors for furnace assessments that <u>do not</u> include other furnace repair/replacement activity.

# SFRR - Furnace Repair

Used to create payments to vendors for furnace repairs.

### **SFRT – Furnace Replacement**

Used to create payments to vendors for furnace replacements.

The following two codes are used for water conservation applications:

# **H2ORT – Water Repair/Replacement**

Used to issue payments to weatherization agencies for water conservation repair/replacement activity.

### **H2OAS – Water Assessment Only**

Used to issue payments to weatherization agencies for water conservation assessments that <u>do not</u> include other repair/replacement activity.

#### 4.6.5 Service Codes

Service codes indicate a service has been provided to a WHEAP household that was not a payment. Service codes do not generate payments and do not affect individual case/WHEAP agency benefit balances.

## SADV - Advocacy

Agency conducts vendor negotiation or energy advocacy resulting in a reasonable, affordable payment plan <u>or</u> results in a fuel delivery (mediation).

#### SLBC - Budget Counseling

Budget counseling, training, or assistance provided.

### 4.6.6 Information and Referral Codes (Additional Services)

The following service codes indicate information has been provided to the applicant and/or a referral has been made for other assistance. Use these codes for any WHEAP cases to which information and/or referrals have been provided. No payment is involved.



## **IOTG - Other Government Program**

Referral to any other government-sponsored program. Specify nature of the program in comment section of Crisis or Prevention Assistance application.

## **IOTN – Other Non-Government Program**

Referral to any other non-government program. Specify nature of the program in comment section of crisis application.

## 4.6.7 Non-WHEAP Funded Payment and Services (Additional Services)

These codes are used when payments or services are provided to eligible households using other source of funds (non-WHEAP) to pay for the benefits or services. Examples of funds include (and are not limited to): fuel funds (such as Hometown, Keep Wisconsin Warm Fund), other federal sources (such as FEMA), and other charitable sources (such as Salvation Army, United Way, Catholic Charities, etc.).

"N" codes may be used by local agencies to indicate that a payment is being provided to eligible WHEAP households using funds other than federal LIHEAP monies. Payments may be made by the local agency or coordinated by the local agency. The HE+ System will not generate a check for these payments. For example, a local agency makes a payment to a WHEAP household using FEMA funds. Record the activity using the NFPO code. A dollar amount is required for "N" codes. (Select "None" in the fund source.)

## NFPO - Fuel Payment - Other Funds

Payment to a fuel supplier using other funds (i.e., United Way or Salvation Army) as a single payment. No copayment contract is involved. The HE+ System will allow selection of a specific funding source and amount awarded to be entered.

### NKWF – Payment to a Fuel Supplier Using Keep Wisconsin Warm Funds

Payment to a fuel supplier using Keep Wisconsin Warm funds as a single payment. No copayment contract is involved. The HE+ System will allow amount awarded to be entered.

"A" codes are used by local agencies to indicate that a service has been provided to a WHEAP eligible household when WHEAP funds are not involved. For example, the local agency may decide to provide budget counseling to an applicant using non-WHEAP funds. The service would be recorded as ALBC. These codes do not generate payments.

### ALBC - Budget Counseling

Budget counseling, training, or assistance provided when non-WHEAP funds are used to support staff providing service.

## **AUPP - Utility Payment Program Participation**

Participation in payment program when non-WHEAP funds are used to support staff providing service.

### 4.6.8 Denials

Agencies may deny Crisis or Prevention Assistance benefits and send a denial letter for Crisis or



Prevention Assistance to the applicant. The more common denials are "Copayment Contract Default" and "Adequate Resources." Workers are able to generate other grantee denials.

## 4.6.9 Cooling Payment Codes

The Cooling Assistance Payment Codes require a declaration of a summer heat emergency. Emergency services for cooling are provided during the summer months only in cases of extreme heat, with a declaration of a heat emergency, <u>and</u> approval from the Division. Agencies may not implement cooling assistance unless a state or local public health official declares a heat emergency, <u>and</u> authorization is given from the Division.

### **PCOA – Air Conditioner Purchase**

One (1) per eligible household. Requires a statement of need from a medical practitioner.

# PCOE – Emergency Payment to Electric Utility

Emergency Payment to electric utility resulting in continuation of service. Payment amount is a local agency decision.

#### **PCOF – Fan Purchase**

Payment for purchase of fan(s).

## PCOL - Window Locking Security Devices

Payment for purchase of window locking devices which allows windows to be raised to promote air circulation while maintaining security.

### **PCOR – Air Conditioner Repair**

Payment to a contractor for air conditioner repair. Payment cannot exceed \$250.

### PCOS - Temporary Shelter

Payment for applicant's temporary shelter/housing during a summer heat emergency.

## PCOT – Training/Education (Cooling)

Payment made to technical school, college, etc. for cost of customer education classes.



# **Chapter 5 | Quality Assurance**

# 5.1 Quality Assurance

Each contracted agency is responsible for participating in Division-conducted and internal quality assurance activities. All agencies will have an overall assessment of program operations at a fixed point in time of each program year. Such activities include, and are not limited to:

- Administrative Reviews (AR)
- Desktop Monitoring (DTM)
- General Quality Assurance (GQA)
- Furnace Quality Assurance (FQA)
- Vendor Desktop Monitoring (VDTM)

# 5.2 Administrative Review (AR) Agency Responsibilities

The contracted agency is responsible for participating in Division-conducted on-site quality assurance activities. Administrative Reviews focus on the following key program areas:

- Fiscal Operations
- Program Operations
- Program Integrity
- General and Furnace Case Review\*

In addition, the Administrative Review process offers dedicated time for all parties to review WHEAP operations for potential additional training and technical assistance opportunities.

WHEAP agencies are required to:

- Respond to the Administrative Review notice letter within the timeframe established by Division staff
- Confirm the Administrative Review date and location with Division staff as requested
- Ensure that all individuals, whose attendance has been requested by Division staff, are present at the specified times as determined by the Division
- Submit the pre-visit questionnaire by the deadline established by Division staff
- Submit documents requested by the Division by the deadline established by Division staff
- Provide reliable internet access for the duration of on-site review
- Provide access to any and all program related files and information as requested by Division staff
- Submit a formal response to the Administrative Review summary letter within 30 days of the date of the on-site observations letter sent by the Division
- Respond to Division requests including implementation of corrective actions within the timeframes established by Division staff



 Implement training at the local level based on Monitoring/Review findings and Division staff recommendations, including making agency staff available for training as directed by Division staff

\*Review application corrections that result in a cancel/refund require Division staff to be contacted for additional guidelines **prior** to conducting the actions in the HE+ System.

# 5.3 Desktop Monitoring (DTM) Agency Responsibilities

The contracted agency is responsible for participating in Division-conducted Desktop Monitoring quality assurance activities. This review is not a replacement for an on-site review, rather a means to ensure that agencies are correctly interpreting and applying WHEAP requirements and policies.

Desktop Monitoring reviews focus on these key program areas:

- Program Operations
- Program Integrity
- General and Furnace Case Review\*

# WHEAP agencies are required to:

- Respond to all agency-required case corrections within the timeframes established by Division staff
- Implement training at the local level based on DTM findings and Division staff recommendations and/or make agency staff available for training as directed by Division staff
- Submit the pre-visit questionnaire by the deadline established by Division staff
- Submit documents requested by the Division by the deadline established by Division staff
- Attend scheduled Training and Technical Assistance Sessions led by Division staff

\*Review application corrections that result in a cancel/refund require Division staff to be contacted for additional guidelines **prior** to conducting the actions in the HE+ System.

## 5.4 General Quality Assurance (GQA) Agency Responsibilities

The contracted agency is responsible for participating in internal General Quality Assurance activities. General Quality Assurance practices are intended to review accuracy of current program year general cases. This internal quality assurance review is a means to ensure that WHEAP workers are correctly interpreting and applying WHEAP requirements and policies. In addition, results should be used to identify areas that should be used for internal training purposes. Local WHEAP agencies shall develop and implement a General Quality Assurance Plan for general cases. The WHEAP agency shall maintain a file with a copy of the plan and the results of the internal review. The written plan shall include procedures for general case quality assurance review including:

- Staff responsible for case review\*
- 2. How cases are selected for review\*\*
- 3. How often reviews occur during the program year



<sup>\*</sup>The local WHEAP agency worker(s) who processed and/or verified the information on the general application under review shall not conduct quality reviews of the general application.

Agencies are required to sample a variety of cases from multiple workers, if possible, when conducting the review.

Using the Division General Quality Assurance tool, WHEAP agencies shall complete their required internal GQA review no later than January 31 of each program year. WHEAP agencies shall upload their completed internal GQA review, to their current WHEAP contract in the HE+ System, within 3 business days of the January 31 deadline. An agency's paid WHEAP caseload for the prior program year shall determine the number of cases selected for review:

- Agencies with a prior year caseload of 5,000 or greater shall select 20 cases as identified by the agency from the current program year
- Agencies with a prior year caseload of fewer than 5,000 shall select 10 cases as identified by the agency from the current program year

At the time of the review, agencies shall add an HE+ System Note to each general case, identifying it as having been reviewed.

Upon request by an employee of the Division of Energy, Housing and Community Resources (DEHCR) or a Division-authorized representative, the WHEAP agency shall produce all of the following:

- 1. The case
- 2. The completed QA review tool
  - a. The QA tool shall identify the general case components reviewed, the results, and the follow-up activities performed to bring the case into compliance with WHEAP Policy requirements (when applicable). Please ensure Chapter 6 is followed when making any corrections and always enter HE+ System Notes to explain why the application is being corrected.

# 5.5 Furnace Quality Assurance (FQA) Agency Responsibilities

The contracted agency is responsible for participating in internal Furnace Quality Assurance activities. Furnace Quality Assurance practices are intended to review accuracy of current program year furnace referrals and cases. Local WHEAP agencies shall develop and implement a Furnace Quality Assurance Plan for furnace repair/replacement activities. The WHEAP agency shall maintain a file with a copy of the plan and the results of the internal review. The written plan shall include procedures for furnace case quality assurance review including:

- 1. Staff responsible for case review\*
- 2. How cases are selected for review\*\*
- 3. How often reviews occur during the program year

<sup>\*\*</sup>Cases selected for the agency internal GQA review must be different from those selected for Furnace Quality Assurance (FQA) review.

<sup>\*</sup>The local WHEAP agency worker who processed and/or verified the information on the furnace application under review shall not conduct quality reviews of the furnace application.



\*\*Cases selected for the agency internal FQA review must be different from those selected for General Quality Assurance (GQA) review.

WHEAP agencies shall ensure the internal FQA is conducted twice per program year: once by January 31 for October to December activity, and once by May 31 for January to April activity. The review shall also include the original or "parent" HE+ Application associated with the furnace service(s) to ensure that eligibility and benefits were accurately determined. WHEAP agencies shall upload their completed internal FQA Review, to their current WHEAP contract in the HE+ System, within 3 business days of the January 31 and May 31 deadline (s). All activity shall use the Division Furnace Quality Assurance tool, and include an annual minimum of:

- Five repair cases, or 10% of the total repair cases (whichever is greater)
- Five replacement cases, or 10% of the total replacement cases (whichever is greater)

At the time of the review, agencies shall add an HE+ System Note to each furnace case, identifying it as having been reviewed.

Upon request by an employee of the Division of Energy, Housing and Community Resources (DEHCR) or a Division-authorized representative, the WHEAP agency shall produce all of the following:

- 1. The furnace case
- 2. The completed QA review tool
  - a. The QA tool shall identify the furnace case components reviewed, the results, and the follow-up activities performed to bring the case into compliance with the WHEAP Policy requirements (when applicable). Please ensure Chapter 6 is followed when making any corrections and always enter HE+ System Notes to explain why the application is being corrected.

# 5.6 Vendor Desktop Monitoring (VDTM) Agency Responsibilities

WHEAP vendors are responsible for participating in Division-conducted quality assurance activities at the Division's request. VDTMs focus on the fair pricing, delivery, and proper crediting practices of a specific vendor.

To assist in the process, WHEAP agencies are required to:

- Respond to Division requests for information regarding a specific vendor within the timeframes established by Division staff
- Participate as requested by the Division in all VDTM-related activities



# Chapter 6 | Errors, Mistakes, and Corrections

# 6.1 Master Record (not currently available)

The Master Record (not currently available) is a system function to save updated information about applicants learned after the current year application has been processed. This provides a method for the updated information to be stored for use on a subsequent application. The Master Record (not currently available) will reflect the data available from the most recent extraction (general application, crisis, furnace, etc.).

An HE+ System Note shall be included specifying changes made to the Master Record (not currently available), along with how the information was learned and/or verified.

# 6.1.1 Change in Address

Changes/corrections in addresses for applications that have been extracted should be recorded by updating the Master Record (not currently available).

- Moved out of county/tribe:
   If the applicant has moved out of your county/tribe, update the Master Record (not currently available) to reflect the change to the mailing address.
- Moved into your county/tribe from another county/tribe:
   If the applicant has moved into your county/tribe, update the Master Record (not currently available) to change the mailing and residence address. If crisis is being requested, update the address in the crisis application and this will automatically update the Master Record (not currently available).
- 3. Moved prior to extraction: If the applicant moved prior to the extraction of the application, update the <u>mailing address</u> <u>only</u> in the application with the new address to ensure the benefit notice reaches the applicant. The application is valid based on the date of the application and must reflect the correct physical address and fuel account information. Add an HE+ System Note regarding the move.
- 4. Moved for Weatherization eligibility:
  If an HE+ eligible household moves, the Weatherization referral does not automatically carry to the new address. The household may re-apply during the same program year to determine eligibility for Weatherization Assistance at the new address by completing an HE+ Application through the local agency. Updating the Master Record (not currently available) does NOT update the Weatherization referral.

#### 6.1.2 Own or Rent

If the "Own or Rent" question was incorrectly completed, or has changed since the original application was processed, update the Master Record (not currently available).

When processing a furnace application, it is sometimes determined that the "Own or Rent" question was incorrectly entered on the original application or that the ownership status has changed. The HE+ System allows workers to change the response to the "Own or Rent" question on the furnace application. However, the information completed on the furnace application does



not carry forward onto the next application. Therefore, the worker needs to update the Master Record (not currently available) to correct the "Own or Rent" field for subsequent applications.

#### 6.1.3 Fuel Switch

If there was a fuel switch conducted when the furnace was replaced, workers should update the Master Record (not currently available) with the new fuel type.

#### 6.2 Benefit Calculator

The benefit calculator allows for a quick calculation of possible benefit amounts.

The benefit calculator will provide a heat (LIHEAP) benefit amount and an electric (non-heating) Public Benefits benefit amount. These are not final/actual benefit amounts as other factors can affect whether a household is eligible for a certain benefit. If a household is not eligible for an electric benefit (for example, because the utility is not participating in the Public Benefits program), the HE+ System benefit calculator will show what the benefit might have been if the household were eligible. Similarly, if a household is not eligible for a heating benefit (for example, because the family lives in subsidized housing with heat included in rent), the HE+ System benefit calculator will show what the benefit might have been if the household were eligible.

The benefit calculator should be used to determine if a benefit has been underpaid, or overpaid, by \$30 or more. During program years that supplemental benefits have been issued by the Division, the \$30 threshold must be based on the sum of the original and the supplemental benefit(s).

# 6.3 Regular Application Actions

When correcting errors or mistakes, or dealing with updates because of additional information, review both heat and electric benefits even if the correction seems to be for only one benefit. Remember the HE+ System deals with each benefit separately.

### 6.3.1 Cancel Benefit (Cancel and Refund)

It is possible to cancel one benefit (heat OR electric) or cancel an application by cancelling both benefits. Do not cancel the entire application when only one benefit needs to be corrected. **Exception:** When cancelling a benefit on an application where Fuel Usage Type is "BOTH", both the HEAT and PB benefit must be cancelled even if only one of the benefits is affected by more than \$30.

Application status will display as "Cancelled" even if only one benefit is cancelled. If no benefit was issued, it cannot be cancelled. See Section <u>6.3.4</u> for "Extracted" applications with one or more benefits denied in error.

#### 6.3.2 Denied Incomplete

If an application is denied as incomplete and not extracted, and the needed information is received before the case extracts, the additional information to the application shall be added to the application. Resubmit for benefits if the case is now completed; "save" if the case is still incomplete.



If a customer provides missing information for their current year application, the WHEAP agency may complete and submit their application even if more than 30 days have passed since the original application date and the application has denied (extracted) as incomplete. In this situation, the worker may reinstate the "Extracted" application if the household composition and income information remain valid. To reinstate an "Extracted" application, a worker creates a new application with the <u>original</u> application date, includes the additional information that was missing from the original application, and submits the new application. To avoid another denial for not being processed in 31 days, agencies shall ensure that all required verification documents are received prior to reinstatement so the new application can be created and submitted on the same day. The deadline for reinstating an application that denied incomplete during the heating season is June 15.

The original Certification Page may be used for the reinstated application.

## **6.3.3 Updates to Unextracted Applications**

If an application needs to be updated and it is in an unextracted state, either "Paid" or "Denied" status, updates can be performed, and the application may be changed to "Pending" (saved) status or may be submitted for benefits. An Application Note shall be added to identify why the application was changed to "Pending".

## 6.3.4 Denied in Error and Extracted (Reinstate the Application)

If an "Extracted" application denies one or both benefits in error, create a new application with the <u>original</u> application date. Include the additional or corrected information, then submit the new application. Add HE+ System Notes to explain the error.

*Example:* Information was received before the 31 days expired but it was not entered in the original application.

This is referred to as "Reinstating the Application", and the original Certification Page is sufficient to consider this application complete.

## 6.3.5 Applications in "Paid" Status - "Extracted" State

Do not cancel an "Extracted" application because an applicant wants to withdraw or because the applicant wants to reapply at a later date.

## 6.3.6 Error with an "Extracted" Application

#### 6.3.6.1 Errors Which do not Affect the Benefit(s)

There are many "errors" which do not affect the eligibility or benefits paid. For these types of errors, do not cancel the application. Errors of this type should be corrected with HE+ System Notes attached to the application with the wrong information documenting the error and the impact to the application and by updating the Master Record (not currently available) so that the incorrect information is not carried forward to future applications.

Examples of these errors include:

• Own or rent designation incorrectly identified (put the correct designation on the furnace



application, if appropriate)

Fuel account number is wrong

## 6.3.6.2 Errors Which May Affect the Eligibility/Benefit(s)

There are many errors which have the potential to affect the eligibility/benefit amount(s). Due to multiple factors affecting eligibility and benefit amounts, each error and each case should be evaluated individually.

Some errors that may affect the benefit amount or household eligibility include:

- Housing type
- Number of rooms
- Incorrect fuel type
- Annual fuel use
- Number of eligible household members
- Income
- Energy burden
- Student status
- Payments to the wrong vendor
- Failure to verify categorical eligibility on an over income application

If an error is discovered on an "Extracted" application which may affect the benefit or eligibility, the first step is to determine if the correction will cause a change in payee, or a change of more than \$30 in either the heat or the PB (electric) benefit. Use the benefit calculator to determine the adjusted benefit. See Section 6.3 for important additional guidance.

1. If neither benefit would be affected by \$30 or more (increased or decreased), add an HE+ System Note to the application clarifying the correct information and benefit calculation results, and in most cases update the Master Record (not currently available) to capture the updated information.

If the error is corrected income (type or values), note the correct income amount in HE+ Application Notes associated with the original application. Income type(s) may need to be added or corrected on the Master Record (not currently available), but income amounts should not be included on Master Record (not currently available) updates.

If income calculation involves reviewing self-employment income documentation that was not included as a document upload with the original application, the additional documents shall be uploaded by using the upload function on the "Extracted" application as "Other WHEAP Documents" in the document slider.

If either or both benefit(s) would be affected by more than \$30 (increased or decreased), then corrective actions need to be taken.

Always enter HE+ System Notes to explain why the application is being corrected.

2. If only one of the benefits is affected by more than \$30, cancel and refund that benefit only.



Enter the correct information on the replacement application (the unchanged benefit will not pay because it has already been paid).

If both benefits are affected by more than \$30, cancel and refund the application (by cancelling both benefits). Enter the correct information on the replacement application. All other application information should be the same as the original application including date of application and fuel usage. Review the fuel usage from the WEFI call and if the usage is different than on the original WEFI call, enter the fuel usage from the original application as a manual fuel entry.

Document upload is required for replacement applications. Additional documents may also be uploaded to the replacement/corrected application if warranted. Documents uploaded to the original application may need to be downloaded from the initial application and then uploaded to the replacement application.

Continue to numbers 3-5 for guidance on when to select "vendor" or "client" regarding repayment for the cancel and refund process.

- 3. When performing a Cancel and Refund for either or both benefits, the responsible party for the refund will default to the vendor. Vendor shall be selected for refund responsibility unless directed in policy otherwise.
- 4. If the benefit with the error was issued as a single party check, the default and only option for refund responsibility will be the client.
- 5. If the benefit with the error, entirely or in part, was paid to a deliverable fuel vendor (propane, fuel oil, wood), the benefit must be corrected. If the applicant has received the fuel, the local agency must proceed with the benefit correction. If the overpayment is due to an agency error, select vendor as responsible for the correction, and cover any shortage to the deliverable fuel vendor resulting from the correction by contacting the HE+ Help Desk to request an Additional Payment be issued for the difference.

NOTE: If an Additional Payment needs to be issued to the vendor to cover funds due, this should be done at the time the benefit is cancelled and refunded. The Additional Payment will be processed on the application that has been cancelled and refunded so payment can be issued at the same time the cancelled benefit is processed.

If the correction can be made before the deliverable fuel dealer has delivered the fuel, then notify the vendor that benefits will be recaptured and proceed with the correction with vendor as responsible. Document in HE+ System Notes when the vendor was contacted and verified that there was sufficient credit balance to cover the overpayment.

In situations where it is not a result of an agency error, select the "Client" as responsible for the refund.

6. For all situations, LIHEAP Crisis Assistance shall not be issued to compensate for a reduction in regular WHEAP benefits due to a correction to an application. Crisis can be issued if the customer needs assistance with their energy costs.

Include in HE+ System Notes how it was determined who is responsible to pay back the



overpayment and how the vendor was notified of this action. DO NOT instruct the vendor to refund any credit balance. When the benefit is cancelled, the payment will be recaptured (offset) from future payments to the vendor.

#### 6.3.6.3 Errors Which Affect Weatherization

If an application is cancelled due to incorrect eligibility determination and no eligible replacement application is processed, the WHEAP agency shall notify the Weatherization agency if the home has not been previously weatherized or weatherization status is "In-Progress". The situation must be fully documented in HE+ System Notes and local fraud procedures must be followed, when applicable.

If there is no current year application that is affected but fraud is discovered that affects eligibility for a prior year application that is dated within the last 12 months, the agency must contact the Weatherization agency as that application may be qualifying the applicant for weatherization services that they are not eligible for.

# **6.3.7 Wrong Account Number Entered**

If the wrong account number was entered, verify the annual costs associated with the correct account number for the same time period as the original application. Use the benefit calculator with the annual costs from the correct account number. If either benefit is affected by \$30 or more, cancel the application and process a replacement application with the correct account number and annual costs. If only one of the benefits is affected by more than \$30, cancel and refund that benefit only. If either benefit is affected by less than \$30, contact the vendor and have them put the credit on the proper account. If only one of the benefits is affected by less than \$30, have them credit that benefit only. Add an HE+ System Note explaining what happened and what corrective action was taken. Update the Master Record (not currently available) with the correct account number.

### 6.3.8 Wrong Vendor Entered on Application

Determine when the vendor changed.

- 1. If the applicant had changed a vendor prior to the application date, cancel the application for that benefit and process the corrected application.
  - a. Cancelling the benefit will recapture the benefit from the incorrect vendor and processing the new application will send the benefit to the corrected vendor. Do not instruct the vendor to send the benefit to the correct vendor.
- If the applicant changed vendors after the application was taken, see instructions in <u>Chapter 7</u> regarding credit balances – the vendor should not return the money to the Division.

#### 6.3.9 Deceased Individual

A user with the "Supervisor" permission can update an individual's status as deceased. From the "Person Summary" for the deceased person, select "Update Status" from the action ribbon. Update the deceased status from the drop down menu to "Yes". Enter an HE+ System Note to indicate how the agency learned of this information.



The Master Customer Index (MCI) also identifies individuals who are deceased. When an SSN alert is received that an individual is deceased, the person status is updated to "Deceased" and a message is added to the Person Summary stating "Person Marked as "Deceased" by SSA and marked via the System. Date of death: MM/DD/YYYY."

If an individual has been identified as deceased, in error, a user with "Supervisor" permission can update the status. HE+ System Notes should be added to document the change in status. The person status will be changed to "Not Processed" and will be validated through the MCI process on the next application.

If the death of the case head or household member occurs after the date of application and before the application is extracted, the application is no longer valid. The application will deny because there is a deceased individual on the application. "Submitted" applications change from "Submitted" status to "Pending-Pending". The following message displays on the application, "At least 1 household member has been marked as deceased" and the SSN status of the individual is "Deceased".

Any unextracted crisis or furnace applications are systematically locked when the case head or household member has been marked deceased. The agency must contact the HE+ Help Desk to unlock the crisis or furnace application and shall receive prior approval before processing the application. Prior to contacting the HE+ Help Desk to unlock the application, the agency shall take a new application to establish eligibility for the remaining household members. If eligibility is established with the new WHEAP application, the agency shall determine the crisis need. If crisis is needed, DEHCR will unlock the crisis application for processing. If WHEAP eligibility cannot be established or if crisis is no longer needed, the crisis application will be unlocked and denied. For additional guidance, please contact the HE+ Help Desk.

NOTE: "Create Current Year Application" and "Create Early Application" is grayed out with the red circle and white minus sign indicating these functions are not available on the "Person Summary" of an individual who is identified as deceased. If a household member is marked deceased, the checkbox on the "Household Members" result list is not available for selection. Proceed with processing the application without the deceased household member and add HE+ System Notes that the individual was listed on the paper application, but now marked deceased. In addition, a case head whose status has been identified as "Deceased" will not be included in Fixed Income report.

## 6.4 Automated Applications

Local WHEAP agency staff is not expected to routinely review the automated applications. Local WHEAP agencies may learn of household circumstance changes (from returned mail or calls from a household member). Do not delete an "Automated Application". The following sections describe the courses of action recommended when circumstances have changed in an automated application household.

#### 6.4.1 Death of Case Head or Household Member

When local WHEAP staff are informed of the death of the case head and/or household member,



do not delete the application.

- 1. When the death of the case head and/or household member happens prior to extraction of the application:
  - a. Navigate to the "Person Summary" of the deceased individual(s) to indicate that the person is deceased. See Section <u>6.3.9</u> for further information on marking an individual as deceased in the HE+ System.
  - b. Marking an individual as deceased changes the application status of any unextracted application to "Pending-Pending" status and the application will deny because there is a deceased individual on the application.
  - c. The following message is displayed on the application: "At least 1 household member has been marked as deceased". The SSN status of the individual is "Deceased".
  - d. The applicant household will be sent a denial letter when the associate application has been extracted.

# 2. If household member(s) remain:

- a. Local agency staff should encourage the remaining household members to apply with a new application. A new application date and new Certification Page is required for the application to be complete. Use WEFI to update annual energy costs. A new application cannot be entered into the HE+ System until the automated application extracts. A paper application process is recommended while awaiting the first extraction.
- b. If the deceased individual is a household member, a new application for the original case head and any other remaining household members is required.

## 6.4.2 Change in Household Composition or Income

When there are changes in the number of household members or in the income counted for the household:

- 1. Make the corrections to the application (change the application status to "Pending" update the information and resubmit). Add HE+ System Notes to explain what was changed and why.
- 2. Obtain a signed Certification Page and upload to the HE+ System,
- 3. Do not change the application date or annual fuel costs.
- 4. Do not change the "Outreach Type" or "Is Interactive" field, and
- 5. Do not delete the application.

### 6.4.3 Change in the Address (Moved)

- 1. If the household has moved and the new location is in the same county or tribe, the local agency must:
  - a. Document in HE+ System Notes the reason the fuel account was active during the automated application process.
  - b. Add HE+ System Notes to explain what household changes occurred, change the application status to "Pending", and change the mailing address to the new address



- so the denial notice is sent to the correct location.
- c. Add HE+ System Notes to explain the situation. The applicant needs to reapply with the new address and household information. The new application cannot be entered in the HE+ System until the automated application extracts. A paper application can be completed until the application can be entered.
- 2. If the move is to a different agency's county or tribe, the agency with the original address takes the first two steps. The applicant must contact the new WHEAP agency serving the new address to complete a new application.
  - a. Document in HE+ System Notes the reason the fuel account was active during the automated application process.
  - b. Add HE+ System Notes to explain what household changes occurred, change the application status to "Pending", and change the mailing address to the new address so the denial notice is sent to the correct location.
  - c. Create a new (complete) application and add HE+ System Notes to explain the situation. The new application cannot be entered in the HE+ System until the automated application extracts. A paper application can be completed until the application can be entered.
- 3. If the move is to an assisted living facility, the local agency with jurisdiction of the application must:
  - a. Document in HE+ System Notes the reason the fuel account was active during the automated application process, and
  - b. Add HE+ System Notes to explain what household changes occurred, change the application status to "Pending", and change the mailing address to the new address so the denial notice is sent to the correct location

## 6.5 Crisis Application Actions

### 6.5.1 Crisis Paid to a Vendor in Error

If a crisis benefit is paid to a vendor in error, the agency shall use the following guidance:

- 1. If the crisis benefit with the error was paid to a deliverable fuel vendor (propane, fuel oil, wood), and the applicant has received the fuel, select "Client" as responsible for paying the benefit back and contact the applicant to set up a repayment arrangement. See Section 7.9 for more information.
- 2. If the crisis benefit with the error was paid to a deliverable fuel vendor and the delivery has not yet been made, select "Vendor" as responsible for paying the benefit back. Contact the vendor to advise the benefit will be cancelled to ensure a future delivery is not made based on that benefit.
- 3. If the crisis benefit with the error was paid to a natural gas or electric vendor, cancel and refund the crisis benefit.
- 4. If a crisis benefit needs to be reissued because the original crisis was paid to the wrong vendor, a new crisis application can be entered if adequate crisis funds exist.

NOTE: The refunded crisis benefit resulting from a cancellation will go back into the central Crisis Assistance account managed by the Division.



## **6.5.2 Crisis Paid to Wrong Account**

If a crisis benefit is paid to the correct vendor but wrong account name or number, the agency needs to:

- 1. Notify the vendor of the incorrect and correct account information,
- 2. Request the benefits be transferred to the correct account name/number,
- 3. Update the Master Record (not currently available) with the correct account name/number, and
- 4. Enter HE+ System Crisis Notes to indicate the date the request was made to transfer the benefits.

## 6.5.3 Crisis Application When Application is Cancelled

If the basic information for the crisis (address, vendor, fuel type) is unchanged, it is not necessary to cancel the crisis. Do not cancel the crisis unless conditions make it necessary.

## 6.5.4 Copayment Agreement Actions

To cancel all remaining payments in a copayment plan without sending a denial letter to the applicant, delete each due date transaction that no longer needs to be paid.

# 6.6 HE+ Program Services Actions

### 6.6.1 Ownership Change

If the ownership needs to be changed for a household because it was incorrectly entered on the regular application, information must be provided to show ownership, or rental tenancy, and the following step shall be followed:

1. Change the homeownership status on the Program Services application. This will automatically update the Master Record (not currently available).

## 6.7 Incorrect HE+ Program Services or Weatherization Referrals

WHEAP agencies may be responsible for repayment of HE+ Program Services (Furnace or Water Conservation services) or Weatherization services expenses if:

- Homeownership is not verified in compliance with HE+ policy
- Furnace, Water Conservation or Weatherization services are completed when the household's HE+ program eligibility is not determined in compliance with HE+ policy
- A HE+ Program Services referral was sent to the Weatherization agency when the HE+ Program Services application contains a denial reason (agencies shall "Save" the HE+ Program Services referral before marking it "Ready for Referral")

The agency that did not follow policy guidelines may be held responsible for repayment of Furnace, Water Conservation or Weatherization services. If the WHEAP agency becomes aware that the above has occurred, the WHEAP agency must notify the Division and/or the Weatherization agency before any action is taken.



NOTE: The household shall not be held responsible for repayment in the above circumstances and WHEAP contract funds may not be used for these repayments.



# Chapter 7 | Payment Adjustments, Refunds, and Returns

# 7.1 Basic WHEAP Payments

Most WHEAP payments are issued directly to a vendor. For some regular benefit cases a check is sent directly to the applicant.

# 7.2 Checks Sent Directly to the Vendor

Regular benefit payments are sent directly to the applicant's vendor (fuel supplier/utility). Crisis Assistance payments are sent directly to vendors supplying the crisis services.

- In order for WHEAP to make payments to any business entity the vendor must be
  registered with the State, have an assigned vendor number, and be designated as "active"
  in the HE+ System. Registered vendors must agree to comply with the policies outlined in
  the Fuel Supplier/Vendor Agreement and set forth their services and servicing
  requirements.
  - A vendor may be active for LIHEAP (heat), Public Benefits (PB) (non-heating electric), or both funding sources. If a vendor is not active for a funding source, it cannot receive a payment from that source. An example of a vendor only eligible for payments from one source is a utility not participating in Public Benefits; such a vendor may be eligible to receive LIHEAP payments and is not eligible to receive PB payments.
- 2. If a local WHEAP agency believes the fuel supplier, or vendor, is not adhering to its agreement, the local agency should notify the Division for investigation. If there is a violation of the agreement, the Division staff will work with the vendor to achieve compliance with the agreement or recommend to the Division Administrator that corrective action is taken, e.g., suspension of fuel supplier/vendor agreement.

# 7.3 Checks Sent Directly to the Applicant

A single party check for Regular Benefits will be sent to:

- Recipients who have heat/electric included in their rent, or
- Recipients who pay heating and/or electrical costs to the landlord or a mobile home park owner, or
- Some recipients on master meters (see Chapter 2), or
- Recipients who purchase fuel from a non-registered WHEAP supplier/vendor.

Crisis Assistance benefits are sent directly to a vendor on behalf of a recipient, not directly to a recipient.

## 7.4 Checks Sent to the Local WHEAP Agency

When a local WHEAP agency enters its address for the applicant mailing address, the HE+ System sends <u>single party checks</u>, for the regular benefit directly to local agencies.

Checks are sent to the local WHEAP agency when a lost or stolen check is replaced or if the mail is returned via USPS for an invalid address.



## 7.5 Payment Registers

For each extraction, one check is sent to a vendor for all applicants who identified the vendor as their energy supplier, Crisis Assistance provider, or Weatherization agency that coordinated HE+ Program Services activity. WHEAP cases are extracted from the HE+ System on Wednesday evenings and checks are mailed the following Monday. Vendors must post payments to customer accounts within seven days from the date of the check. Due to federal holidays, occasional deviation from the extraction schedule is warranted. The extraction schedule for the full program year may be found via the Division website.

Prior to receipt of this check, the vendor is provided a payment register on the HE+ System or via mail. The payment register includes account number, account name, applicant name, applicant address, county/tribe, benefit amount, and benefit type.

Vendors, local WHEAP agency staff, and State staff having specific security access can view check registers.

## 7.5.1 System Codes

1. Payment Codes – These codes regularly appear on the check registers.

**HTPAY** Heat Paid – Regular heat (LIHEAP) benefit payment

PBPAY
PB Paid – Regular electric (Public Benefits) benefit payment

CRPAY
LIHEAP Crisis Paid – All types of LIHEAP crisis payments

PCPAY
PB Crisis Paid – All types of Public Benefits crisis payments

**FNPAY** Furnace Paid – Payments for furnace services

2 Cancellation Codes

**CRCAN** LIHEAP Crisis Cancellation

**PCCAN** Public Benefits Crisis Cancellation

**FNCAN** Furnace Services Cancellation

**HTCAN** Heat Benefit Cancellation

**PBCAN** Electric (PB) Benefit Cancellation

3. Reserved Payment Codes

CRRES LIHEAP Crisis Reserved (SCCC) – LIHEAP funds reserved for future

payment

PCRES PB Crisis Reserved (SPBC) – Public Benefits funds reserved for future

payment

**FNRES** Furnace Reserved – Funds reserved for furnace services

4. Denied Payment Codes

**CRDENY** LIHEAP Crisis Denied

**PCDENY** Public Benefits Crisis Denied

FNDENY Furnace Denied
HTDENY Heat Denied

**PBDENY** PB Denied



**PHDENY** 

Heat and PB Denied with a "General Denial" – Examples of a General Denial include "Your income exceeds the eligibility limit," and "The application date has exceeded 31 days."

#### 7.6 Check Returns

When any check is sent to the Division, it must be accompanied by a memo identifying the applicant(s), the amount of the benefit(s), what the payment(s) was (regular, crisis, or HE+ Program Services benefit), and the reason(s) for the return.

Refunds, repayments, and written communications concerning payments should be addressed to:

DOA/Division of Energy, Housing and Community Resources Attn: WHEAP Refund PO Box 7970 Madison, WI 53707-7970

Email communications should be addressed to <a href="mailto:heat@wisconsin.gov">heat@wisconsin.gov</a>

Checks should be made payable to DOA/Division of Energy, Housing and Community Resources.

#### 7.6.1 Recipient Returns

When a single party heating/non-heating assistance check is returned to the local WHEAP agency, the agency shall provide the recipient with a receipt for the check. Send the check along with the check stub, if available, to the Division of Energy, Housing and Community Resources. <u>DO NOT ENDORSE THE CHECK.</u>

## 7.6.2 When a Notice is Returned by Post Office

Notices are only returned when the post office does not have forwarding information for the applicant. When a benefit notice is returned by the post office, do not discard the returned notice before checking on the reason for the return.

Try to determine the applicant's correct mailing address, correct any discovered errors by updating the Master Record (not currently available), enter an HE+ System Note, and if an address was established, resend the notice.

Returned mail should raise a caution flag about an applicant's situation and be investigated for application data accuracy.

# 7.6.3 When a Single Party Check is Returned by the Post Office

Single party checks are returned to the local agency whether or not forwarding information is available. Agencies shall have policies and procedures in place for how returned checks are securely handled and securely transported to the appropriate person(s) at the agency. Checks shall be kept in a secure location.

The following steps shall be followed:



- 1. If the returned check includes a new address:
  - a. Contact the applicant to verify the address,
  - b. Correct an error(s) or the entire address in the application mailing address by updating the Master Record (not currently available),
  - c. Check to see if there are related changes in the case record (house type, number of rooms, fuel type, etc.),
  - d. Add an HE+ System Note, and
  - e. Resend the check.
- 2. If the return notice does not indicate a new address and a forwarding address is verified, make any necessary changes by updating the Master Record (not currently available) (see steps above);
- 3. If the return notice does not indicate a new address and no forwarding address is established, enter an HE+ System Note.

If the applicant cannot be located within 90 days after the agency receives the returned check, the check must be mailed to the Division. If the applicant contacts the agency regarding the check after it has been returned to the Division, contact the HE+ Help Desk. Only checks returned to the Division within the current program year can be reissued. Checks issued in a prior program year cannot be reissued.

Returned mail should be investigated for application data accuracy.

# 7.6.4 When a Supplemental Benefit is Returned

- 1. Single party supplemental benefit checks returned by USPS must be processed as specified in Section <u>7.6.3.</u> Never cancel an application because of a returned single party supplemental benefit check.
- 2. Vendors will often return applicant supplemental benefits when an applicant moves and does not provide the vendor with a forwarding address. If an applicant subsequently contacts the agency to claim the payment, contact the HE+ Help Desk.

## 7.6.5 Returned Because the Applicant Is Deceased

If an applicant is deceased (after the application date), the check should be used to pay outstanding energy bills, and the remaining balance must be returned to the Division when the account is closed. DO NOT ENDORSE THE CHECK. Navigate to the "Person Summary" in the HE+ System to indicate that the person is deceased.

## 7.6.6 Vendor Identified Incorrect Payments

All suppliers are required to review the weekly WHEAP payment register for accuracy of home energy assistance and Crisis Assistance payments. In the event a payment is made to a supplier in error, the vendor should contact the local agency (listed on the payment register) within 30 days to correct the error.

1. Payments of regular WHEAP benefits made in error must be corrected by the local WHEAP agency and will be refunded/recaptured through the next regular WHEAP home energy



assistance payment(s) made to the supplier—vendors should not prepare and send a check to the Division in these situations unless requested by Division staff.

- 2. In the event a Crisis Assistance payment is made to a supplier in error, the local WHEAP agency must:
  - a. Cancel/refund the crisis payment;
  - b. Notify the vendor of the error; and
  - c. Inform the applicant about the change in benefit.

Vendors should not prepare and send a check to the Division in these situations unless requested by Division staff, as the benefit will be offset by a subsequent regular 'Heat' and/or "Public Benefit" (PB) benefit paid (HTPAY/PBPAY).

#### 7.7 Refunds

Vendors must notify the local WHEAP agency of any refunds.

Refunds may be for one or more customers. Each customer needs to be identified, if multiple customers' refunds are on one single check. The amount returned needs to be identified per customer.

When it is appropriate to return funds to the Division, checks should be made payable to DOA/ Division of Energy, Housing and Community Resources, and the following information should be provided:

- 1. Customer/Applicant's Name,
- 2. Customer/Applicant's Address,
- 3. Name of agency where customer applied for WHEAP,
- 4. Date of energy assistance (or heating season) benefit,
- 5. Reason for the return of funds (such as moved and unable to contact, deceased, or moved but new vendor does not participate in the State Public Benefits program),
- 6. Type of funds returned (such as LIHEAP Heat Benefit, LIHEAP Crisis Benefit, PB electric benefit, PB Crisis Benefit, or HE+ Program Services Benefit), and
- 7. Amount of funds being returned.

## 7.7.1 Regular Benefits

Regular Benefit payments made to a fuel supplier shall be applied to the current heating season costs. WHEAP payments that exceed current heating season costs must be applied as a credit to the customer's account. Supplemental payments are considered part of the original WHEAP benefit.

- 1. If a recipient retains the same supplier with an active account, the credit balance remains with the supplier until exhausted.
- 2. If the account becomes inactive, a reasonable effort must be made to contact the applicant and/or the local WHEAP agency to identify the new fuel provider to transfer the credit to the new supplier. Exception: Public Benefits non-heating assistance (electric) is not



- transferrable to a vendor who does not participate in the State Public Benefits program. If the vendor does not participate, the funds should be refunded to the Division.
- 3. If a new fuel provider cannot be identified, the funds should be transferred to the customer/applicant. Exception: Public Benefits non-heating assistance (electric) is not transferrable to an applicant whose vendor does not participate in the State Public Benefits program. If an applicant's vendor does not participate, the funds should be returned to the Division.
- 4. If the customer/applicant cannot be located the funds should be refunded to the Division.
- 5. If the customer/applicant moves out of the state, any LIHEAP heat benefit is to be transferred by cash or check to the customer/applicant. All Public Benefit (electric) assistance balances are to be refunded to the Division.
- 6. If a credit balance remains for a deceased applicant and the account is closed, the balance must be refunded to the Division no later than the end of the program year (September 30).
- 7. When a WHEAP recipient who uses deliverable fuel moves their household, and as a result the recipient has no direct relationship with a fuel supplier, a vendor must notify the landlord of the amount of remaining fuel in the tank of the WHEAP recipient tenants who have moved from residence. Landlords must issue a refund to the WHEAP recipient tenant for the amount of fuel remaining. If unable to locate the WHEAP recipient tenant, the landlord shall issue a refund to the Division. The landlord is not permitted to retain the fuel or debit the refund against a balance owed. When a recipient moves out of state, the funds shall be refunded to the Division. The funds belong to the WHEAP recipient and/or the Division.

#### 7.7.2 Crisis Benefits

- 1. If a recipient retains the same supplier with an active account, the credit balance remains with the supplier until exhausted.
- 2. If the account becomes inactive, a reasonable effort must be made to contact the applicant and/or the local WHEAP agency to identify the new fuel provider and transfer the credit to the new supplier.
- 3. If a new fuel provider cannot be identified, the funds should be refunded to the Division.
- 4. If the customer/applicant cannot be located, the funds should be refunded to the Division.
- 5. If a customer moves out of state, the credit balance must be refunded to the Division.
- 6. If a credit balance remains for a deceased applicant and the account is closed, the balance must be refunded to the Division.
- 7. When a WHEAP recipient who uses deliverable fuel moves their household, and as a result the recipient has no direct relationship with a fuel supplier, a vendor must notify the landlord of the amount of remaining fuel in the tank of the WHEAP recipient tenants who have moved from residence. Landlords must issue a refund to the WHEAP recipient tenant for the amount of fuel remaining. If unable to locate the WHEAP recipient tenant, the landlord shall issue a refund to the Division. The landlord is not permitted to retain the fuel or debit the refund against a balance owed. When a recipient moves out of state, the funds shall be refunded to the Division. The funds belong to the WHEAP recipient and/or the Division.



# 7.8 Lost, Stolen or Destroyed Benefit Checks

## **Single Party Check**

No action can be taken on checks or benefits that were issued in a prior program year. If an applicant contacts the local agency and states they have not received a benefit check that was issued in the current program year, or that it was stolen or destroyed, the applicant must complete a Stop Payment Request. Requests are processed by the Division, and result in one of two actions:

- If the check has been cashed, the Division informs the local agency to inform the applicant.
- If the check has not been cashed, the Division mails a replacement check to the applicant
  after the local agency confirms the mailing address and adds a System Note that they have
  confirmed the customer's mailing address.

A Stop Payment Request includes completing a WHEAP Affidavit of Lost, Stolen or Destroyed Benefits Form, and should be completed in the following scenarios:

- 1. An applicant states they have not received a check. Please note the following:
  - a. The check must have been issued within the current program year.
    - NOTE: Checks that are not expired because they were issued within the last 12 months, but were benefits issued on a prior program year cannot be reissued even if they are still outstanding.
  - b. It must be at least 3 4 weeks since the check was issued. This is due to the process that is followed if the applicant moved to a new address, or the check was mailed to the incorrect address.
    - Checks cannot be forwarded to new addresses. Envelopes containing checks are stamped "Return Service Requested" and are returned to the local agency. Because this process takes an average of 3 weeks, agencies should be checking their returned mail in cases where the applicant has since moved or an incorrect mailing address was processed.
- 2. An applicant knows the check was received but the check has been lost, stolen, or destroyed regardless of when the check was issued.

## **Completing a Stop Payment Request**

- The agency completes the check information section of the WHEAP Affidavit of Lost, Stolen or Destroyed Benefits Form <u>before</u> presenting to the applicant.
- 2. The applicant completes the remainder of the Affidavit and returns to the local agency.
- 3. The agency reviews the Affidavit then signs it.
- 4. The agency provides a copy of the Affidavit to the applicant.
  - a. The agency shall upload the signed Affidavit to the "Other WHEAP Documents" repository of the associated application.
- 5. The agency sends an email to the HE+ Help Desk (<u>heat@wisconsin.gov</u>), stating an Affidavit has been uploaded to the HE+ System. The email shall include the following information:



- a. Person ID Number (PID)
- b. Applicant/Case Head Name
- c. The application number associated with the upload
- 6. Add an HE+ System Note to the application that an Affidavit was completed by the applicant, and a Stop Payment Request was sent to the Division

NOTE: The HE+ System only allows a worker from the agency that processed the parent application to upload documents. Consequently, agencies that process an Affidavit for a customer whose application was not processed by their agency shall email the Affidavit to the HE+ Help Desk and Division staff shall upload the Affidavit to the 'Other WHEAP Documents' repository.

## **Results of the Stop Payment Request**

- 1. The check has been cashed:
  - a. The Division informs the local agency the check has been cashed so the local agency can inform the customer.
  - b. If the applicant insists they did not cash the check, have the applicant complete form DOA-2789 (including the oath and notary signature) and form DOA-2790 (handwriting samples). The agency is required to upload form DOA-2789 and DOA-2790 to "Other WHEAP documents" and mail the originals of both forms to the Division within 30 days. The agency is required to add an HE+ System Note to document the forms were completed and mailed.
    - i. Both forms can be requested by contacting the HE+ Help Desk at heat@wisconsin.gov.
  - c. The Department of Administration's bank initiates a forgery investigation and issues a cashier's check if there is a settlement on the forged check. The bank that cashed the check may also initiate a forgery investigation. The process can take several months. The Division forwards the cashier's check to the local agency's WHEAP Coordinator for the applicant to pick up at the agency after presenting a valid photo ID.
  - d. The applicant may wish to contact the local law enforcement authorities.
- 2. The check is outstanding
  - a. The Stop Payment is completed on the outstanding check.
  - b. A WHEAP check, on which payment has been stopped, can be replaced only with a State Controller's Office "S" series replacement check. "S" series checks are not generated through the HE+ System.
  - c. The stop payment action and replacement check are recorded on the "Transaction Register" in the HE+ System.
  - d. The Division mails the "S" series check to the applicant. If this is the applicant's second request for a replacement check for the same benefit, the applicant is required to pick the check up at a local agency after presenting a photo id. The agency is required to add an HE+ System Note to document the customer picked



## up replacement check.

## Single Party check issued to the applicant in error

If the local agency becomes aware of information that would have made the case ineligible (whether or not the incorrect information resulted from fraud), and the check has not yet been cashed, or if the local agency becomes aware that the applicant is ineligible, the WHEAP agency must notify the Division in writing (an email to the HE+ Help Desk will suffice) and add an HE+ System Note. An Affidavit of Lost, Destroyed or Stolen Benefits Form, completed by the applicant, is not needed.

#### **Vendor Checks**

Vendors do not have to complete an Affidavit of Lost, Destroyed or Stolen Benefits Form. The agency or vendor should contact the HE+ Help Desk when a check has not been received. Stop Payment and replacement checks can only be processed for checks issued in the current program year.

#### Stale-dated checks

State issued checks stale date (expire) after 12 months from the date of issuance. These are recorded on the Transaction Register in the HE+ System as a "Cancelled Draft". If an applicant requests that a stale-dated check be reissued (they just found the check or state they never received the check), agencies shall advise the applicant that this check cannot be replaced as it is stale-dated and was issued for a prior program year. Add an HE+ System Note to the application regarding the action taken.

Contact the HE+ Help Desk if there are any questions on prior program year's lost, stolen, or destroyed benefits checks.

# 7.9 Overpayments and Applicant Repayments

- 1. The local agency must establish a separate file on overpayments that the recipient is required to repay any Regular Benefits, Crisis Assistance benefits, HE+ Program Services benefits, and/or Weatherization services regardless of program year association, including those that are being recouped through the HE+ System. The file shall include:
  - a. A list of those cases in which an overpayment may have been made,
  - b. The date the recipient was notified of the overpayment,
  - c. The disposition made, i.e., recovery, and
  - d. The date and amount of any recovery or the amount of un-collectible funds.
- 2. Regular heat and PB benefits canceled during the heating season, and cancelled crisis benefits where "Vendor" is selected as responsible for paying back will be recouped by the HE+ System through subsequent regular and crisis heat or PB payments.
- 3. When "Client" is selected as responsible for paying back benefits, or when the customer still owes benefits when a single party payment is corrected, the WHEAP agency shall complete a Repayment Agreement and provide it to the customer for his/her signature. A Model WHEAP Repayment Agreement form can be found on Home Energy Plus Training & Technical Assistance (HE+ TTA) website under WHEAP > Forms. A copy of the agreement



shall be uploaded by the agency under "Other WHEAP documents" until the signed original agreement is received. A copy of the signed agreement shall be provided to the customer, then uploaded to the HE+ System by the agency under "Other WHEAP documents". If the customer refuses to sign or return the original Repayment Agreement, the uploaded unsigned agreement shall serve as the record of repayment. Any benefits still owed by the customer when the next application is processed as the case head, will have current year paid benefits reduced from the benefit awarded for the application. This will automatically be performed by the HE+ System even if an active repayment agreement is in place with the local agency.

4. When determining the overpayment amount for prior years, use the HE+ System benefit calculator with the correct information from the prior year(s) to determine the benefit amount the household should have received. Enter the difference in benefit, instead of including the full benefit, on the repayment agreement.

Overpayments should be payable to DOA/ Division of Energy, Housing and Community Resources and be mailed by the local WHEAP agency to the Division with a cover letter specifying the following:

- a. Name,
- b. Full address,
- c. Reason for the overpayment,
- d. Indicate Heating, Non-Heating or Crisis Benefit, HE+ Program Services Benefit, Weatherization Services,
- e. Name of WHEAP agency, and
- f. Date of the initial energy check or the appropriate heating season.

If the recipient chooses to pay in monthly installments, the local agency must send the payments to the Division as they are received. The local agency is responsible for ensuring that the Division receives the full overpayment within one year from the date the overpayment was discovered. However, if the recipient requires a repayment plan beyond one year, Division approval is required and full payment is expected to be made as soon as possible.

# 7.10 Bankruptcy

If an agency receives a stay order from a court stating that an applicant has filed bankruptcy and listed the agency as a creditor, suspend recoupment activity pending the outcome of the bankruptcy petition. Immediately file proof of claim with the court.

When the bankruptcy process is complete, the court will notify the local agency of the outcome. Consult your agency's counsel or district attorney for instructions on resuming recoupment activity.



# Chapter 8 | Administration

#### 8.1 Local Administration

The Division contracts with counties, nonprofit organizations, and tribes for local administration and delivery of WHEAP.

County departments of social/human services, nonprofit organizations, or designated tribal offices are responsible for the local operation of WHEAP. Each agency must provide eligible households living within the agency's jurisdiction with available WHEAP benefits and services.

Tribes contracted to provide WHEAP services are responsible for local program administration to applicants living within the borders of the reservation. Contracted tribes may send applicants living within the reservation borders to other WHEAP agencies contracted to serve tribal reservation lands within their general boundaries to provide services to households residing within the reservation boundaries.

# 8.2 Program Operations

Each local agency must administer WHEAP within the guidelines, policies, and regulations set forth in the current year WHEAP Manual, the current year WHEAP contract with the Department of Administration, Division of Energy, Housing and Community Resources, relevant State of Wisconsin Statutes, and appropriate federal regulations.

#### 8.2.1 General

Local agencies shall:

- 1. Send at least one employee to all Division-administered required WHEAP meetings, training sessions, and conferences.
  - If a WHEAP agency is unable to provide representation at the required meeting, training, or conference, a written explanation from the WHEAP Director shall be submitted a minimum of twenty-four hours before the start of the meeting, training, or conference.
  - Unexcused absences or agencies with a history of non-participation are subject to penalties as outlined in the WHEAP contract.
- 2. Obtain prior approval from the Division for out-of-state conferences or training. See Section 8.3.3.

## 8.2.2 Public Information

Local agencies are responsible to provide information to the public in the agency's jurisdiction about WHEAP (energy assistance). This information must also be made available on the local agency's website. The local WHEAP agency's public information about the program must include at least:

- 1. The availability of energy assistance, Crisis Assistance, and Weatherization services;
- 2. Eligibility requirements, how to apply (including the Online Application Portal link), location of application sites, times to apply;



- 3. Identify the program as administered by the State of Wisconsin Home Energy Plus (HE+) Program and include the HE+ logo on the local agency's public website;
- 4. Provide, on at least the WHEAP agency public website, a brief description and link to the HE+ Online Application Portal (https://energybenefit.wi.gov).

The local WHEAP agency may provide a direct hyperlink to the Division website; the link shall be titled, "Wisconsin Home Energy Plus Programs". An agency may choose to include the hyperlink in lieu of items (1-3).

HE+ and co-branding logos are required on all program materials prepared and published by the local agency. See Section <u>8.5.8</u>.

The local WHEAP agency is required to:

- Establish and publicize a local or toll-free telephone number where persons can call yearround for general WHEAP information. The publicized telephone number shall have voicemail or an answering machine where persons may leave a message when the phone is not answered. Messages must be answered in the order of receipt and no later than 48 hours from the date of the message;
- Establish procedures to identify no-heat emergency telephone calls and to respond to the calls within the required timeframes (see <u>Chapter 4</u> and the HE+ Program Services Manual)
- 3. Notify the Division and Weatherization agency of agency closures that affect normal business operations. This would include closures for training, inclement weather, etc. Agencies do not need to notify the Division of holiday closures. For scheduled closures, notification should be provided at least 48 hours prior to the day of closure.
- 4. Notify the Division if any agency operations are unavailable. This includes, but is not limited to, phones, email, and scheduling system(s).

#### 8.2.3 Outreach

- 1. Agencies are required to provide outreach services to maximize participation of eligible persons for WHEAP benefits. Outreach activities must target households with disabled persons, elderly persons, children under six years old, and persons working at low wage jobs (working poor). The "outreach indicator" is a question on the paper and HE+ System application. See Section 3.4.4 for more information about the outreach indicator.
- 2. Agencies are required to prominently display the HE+ Weatherization/WHEAP Co-Branding Poster in the agency's main waiting area for WHEAP intake. WHEAP agencies are encouraged to also consider displaying the poster in intake workers' offices, outreach locations, and other appropriate areas. Agencies may choose to develop and display their own WHEAP posters provided they contain the HE+ logo and the county/tribe specific cobranding logo. See Section 8.5.8.
- 3. Agencies are encouraged to play the HE+ Weatherization/WHEAP video(s)\* in agencies' main customer service waiting areas. Agencies shall make the Home Energy Plus video(s) accessible via electronic media such as Facebook, Twitter, and/or the agency website, if feasible.\*



- 4. Agencies shall reference and provide the Online Application Portal link (https://energybenefit.wi.gov) via electronic media such as Facebook and Twitter if feasible. Agencies are required to provide and reference the link on the agency website.
- 5. Agencies are required to ensure that persons with limited English proficiency (LEP) have meaningful and equal access to benefits and services. The agency is required to provide spoken interpretation in addition to translated written publications as some individuals may not read English or other languages. The agency must have a mechanism to communicate orally with people with LEP. Providing the Spanish version of the HE+ Application is not fulfilling this policy requirement. If the applicant requires spoken communication and/or explanation in addition to the translated application, agencies shall ensure verbal interpretation is available.
- 6. Agencies are required to provide services to the disabled and impaired, including but not limited to assisting applicants with the completion of the application form, translation of material, interpretation services for deaf persons, and reading services for blind persons.
- 7. Agencies must establish HE+ Application sites that are accessible to targeted households and process submitted online applications within a reasonable time.
- 8. Agencies must comply with federal law and provide an alternate intake site separate from a site which administers W-2/TANF. All agencies are compliant due to the implementation of online applications.
- 9. Agencies must provide assistance with the preparation and submittal of applications by persons who are homebound.
- 10. Agencies must arrange an early application period for persons in targeted groups and **high-risk households**.
- 11. Agencies are required to have a completed Program Operations and Community Service (POCS) Plan. The Division provided template is available on the Home Energy Plus Training & Technical Assistance (HE+ TTA) website under WHEAP > Forms. Each agency is required to review their current plan and update the date reviewed section on the plan before the start of each program year. The goal of this plan is to provide agencies with a means to describe how the agency will conduct outreach, identify and enroll eligible households in their communities, and reach targeted households. The POCS Plan should indicate what other community resources/stakeholders play a role in this outreach effort and identify key stakeholders that the agency coordinates efforts/referrals with. In addition, the list should indicate the local agency's contact person and the resource services provided. The plan must be made available to the Division upon request.
  - \*The HE+ videos are on the HE+ Training & Technical Assistance (HE+ TTA) website under Administration > HE+ Videos.
- 12. Agencies may establish interagency agreements with other low-income program offices to perform some of the outreach activities to targeted groups.

## 8.2.4 Agency Information

Each WHEAP agency shall review the following information for accuracy before the start of each Federal Fiscal Year (October 1).

1. In the HE+ System, the name, address, phone numbers and e-mail addresses of person(s) responsible for administration and operation of WHEAP. Additionally, review that agency



staff are listed with the correct positions, including:

- a. a Director (party responsible for signing the contract and oversight of the program)
- b. at least one WHEAP Coordinator (party responsible, at a minimum, for the high-level administration),
- c. fiscal staff, and
- d. no more than two\* Profile Management Administrators (PMA).
- 2. In the HE+ System, the business address(es) and telephone number(s) for applicants to contact and to be displayed on computer-generated notification letters.
  - a. In the HE+ System, this information is found via the business view page under "Locations" in the "General" section. Click on the address for the business location to view business location details: the physical address, mailing address, and phone number.
- 3. Contact information on the Division website
- 4. Ensure the agency is meeting the alternate intake and outreach requirements of the federal law

# 8.2.4.1 Updating Agency Information

The agency is responsible for ensuring that all contact information in the HE+ System is up to date. Any changes to WHEAP contacts, including positions (Director, Coordinator, Fiscal, etc.), must be updated in the HE+ System by the agency. The agency shall also notify the Division, via the HE+ Help Desk email, when there are any changes to the Coordinator, Director, and/or Fiscal Staff.

Changes to business locations, mailing addresses, agency phone numbers, or the Profile Management Administrator must be changed by the Division. Submit any updates in writing to the HE+ Help Desk (heat@wisconsin.gov).

## 8.2.5 Intake

The local WHEAP agency must conduct intake for the WHEAP and Weatherization programs. The **intake** program, at a minimum, is required to:

- 1. Establish a location for the distribution and receipt of applications;
- 2. Provide flexible office hours to accommodate applicants who cannot apply during normal business hours;
- 3. Ensure all application sites are accessible to persons with physical disabilities;
- 4. Ensure application sites are physically and geographically available for all potential applicants within the county/tribal jurisdiction;
- 5. Provide for an alternate intake method (as required by federal law), such that an applicant is not required to apply in person at a site where W-2/TANF is administered; and
- 6. Develop a working relationship with the local Weatherization operator(s).

<sup>\*</sup>If an exception is needed to this limit, please contact the HE+ Help Desk. This request must be submitted on an annual basis.



- a. The Division provides the Weatherization agencies with a list of potential applicants based on applicants who have received regular WHEAP benefits.
- b. Agencies may provide the applicants with the name, phone number, and address of the local Weatherization operator.

In accordance with Department of Energy (DOE) Weatherization Program Notice 10-08, agencies are required to keep confidential any specifically identifying information related to an individual's eligibility for the HE+ Program, or the individual's participation in the HE+ Program.

Each WHEAP agency, in its entirety, must comply with the Agency Guidelines for Handling Sensitive Data (Appendix A).

## 8.2.6 Complete and Process Applications

Local WHEAP agencies are required to take applications and assist applicants in completing the HE+ Application. Applications must be taken throughout the year to establish eligibility for Prevention Assistance and Weatherization assistance after the heating season is over, and for regular energy assistance benefits and Emergency Crisis Assistance during the heating season.

Chapters 2, 3, and 4 of this manual, and the HE+ Program Services Manual describe how to process applications for Regular Benefits, Crisis Assistance, and Program Services. In addition, each agency is responsible for:

- 1. Entering HE+ Applications into the HE+ System within 30 days of the application date. NOTE: Regardless of the actual date when an Early Application is taken by the local WHEAP agency, the HE+ System processes the Early Application like an October 1 application.
  - a. If an extraction is delayed, all processing of payments and notifications are also delayed.
- 2. Verifying application information and viewing supporting documents to certify the application data is accurate.
- 3. Entering multifamily building applications into the HE+ System within 30 days, or less, for the local Weatherization operator to achieve the number of eligible dwelling units needed to make the building eligible for Weatherization Assistance.
- 4. Entering all applications into the HE+ System in chronological (date) order. Applications will be processed using the data from the first chronologically entered application. See Section 3.3.4.
- 5. Ensuring applications are complete, unless applicant withdraws or fails to provide required information.
- 6. Resolving application and check issuance problems.
- 7. Document the receipt and resolution of all complaints.
  - a. Documentation shall be made available to the Division upon request.

NOTE: \*See Section 3.3.4 for addition information on processing online applications.



#### 8.2.7 Crisis Assistance

Each WHEAP agency is required to provide Emergency Crisis and Prevention Assistance services to assist applicants with home energy costs. It is important for WHEAP-contracted tribes to provide these services to households within their reservation. County agencies with WHEAP contracted tribal reservation lands within their general boundaries may provide services to households residing within the reservation boundaries.

#### 8.2.7.1 Contract Spending

WHEAP agencies shall budget the full WHEAP contract allocation for twelve months of activity. Time reporting is strongly encouraged for budgeting and for reporting of actual expenditures. Each account line must be expended according to its intended use and no account line shall be spent egregiously.

Monthly expenses to Crisis Services shall be spent within a reasonable ratio in comparison to the number of crisis applications the agency has processed by month. The Division will determine a reasonable ratio based on program operation factors and comparisons. Each Crisis Benefit issued requires crisis activity by the agency intake staff, which should be expensed to the Crisis Services contract account line. Some crisis activities will not result in a Crisis Benefit to an applicant, yet still may be an expense to the Crisis Services contract account line.

Monthly expenses to "Operations" (LIHEAP/Public Benefits-WHEAP/Public Benefits-Wx) shall be spent within a reasonable ratio in comparison to the amount of regular applications processed by month.

## 8.2.8 HE+ Program Services

See the HE+ Program Services Manual on the Home Energy Plus website for details of the WHEAP agency's responsibilities.

# 8.2.9 Fraud

All agencies are required to have procedures in place to handle fraud. If fraud is suspected, collect all information available about the case. Present this to the authority(ies) in the local agency who handles fraud cases (district attorney, sheriff, etc.) for investigation.

If a fraud referral is sent to the agency from the Division, the agency shall respond to the Division within five (5) business days with the results of the agency's investigation and with the agency's course of action.

A worker signature on the Certification Page certifies that the worker has verified the information on the HE+ Application in accordance with HE+ policies and is complete and accurate to the best of their knowledge. If a worker has doubt of the information's accuracy, further investigation shall be done to determine the accuracy of the information presented.

In the case of any claim or statement made by any individual (case head or other household member(s)) relating to any of the benefits received, the individual(s) may be held liable for penalties and assessments under the Code of Federal Regulation Title 45, Subtitle A, Section



79.3.

Upon completion of the investigation, determine if any benefits (LIHEAP/heat, Public Benefits, crisis, furnace, and/or weatherization) were awarded to applicants who were not eligible, or if a benefit overpayment occurred. If it is determined that fraud occurred, proceed with a cancel/refund of any benefits affected by the inaccurate information. Customers must complete a new application if they choose to reapply.

If verification of fraud exists for previous years, proceed with the Home Energy Plus Repayment Agreement form for whichever heating year(s) the fraud is affected by. HE+ System Notes are required for all fraud investigation cases. If the overpayment is with a deliverable fuel vendor, the local agency must proceed with the benefit correction by selecting the client as responsible for the refund. This payment shall be included in the customer repayment agreement. Refer to Section 7.10 if there is a need for a customer repayment agreement. Contact the HE+ Help Desk for assistance.

Refer to Section <u>6.3.6.3</u> regarding Errors Which Affect Weatherization. When it is determined that an application for the current year or a prior year application within the last 12 months is not eligible for energy assistance, the agency shall contact the Weatherization agency to advise them that the applicant is no longer eligible for weatherization services.

Refer to Section <u>7.9</u> Overpayments and Applicant Repayments to ensure compliance with maintaining a file of overpayments.

In order to mitigate fraud and maintain program integrity, agencies shall ensure compliance with all applicable elements of <u>Appendix A</u> - Agency Guidelines for Handling Sensitive Data. If requested by the Division, agencies shall identify all steps taken to comply with <u>Appendix A</u>.

Report all incidences of worker fraud to the Division. The Division will provide guidance to the local agency regarding inactivating the contact and user profile of a worker who is under investigation for fraud.

## 8.3 Contract and Fiscal

It is every WHEAP agency's responsibility to read and understand the Wisconsin Home Energy Assistance Program contractual obligations. In addition, the agency acknowledges the fiscal responsibilities outlined in the WHEAP contract and the WHEAP Manual. Direct all questions and comments to the HE+ Help Desk.

## 8.3.1 Payment for Contract Services

Funds for LIHEAP Operations, LIHEAP Crisis Services, Public Benefits - WHEAP Operations-Outreach, and WX Operations-Outreach are allocated to WHEAP agencies through a direct contract with the Department of Administration (DOA). Not all counties/tribes receive funding in LIHEAP Operations and LIHEAP Crisis Services.

WHEAP agencies are provided contracts on a five-year cycle. The first year of the contract, each agency will receive a full original contract for signature. The second, third, fourth and fifth years of



the five-year cycle each agency will receive automatic renewals that contain a budget allocation. No signature is required with renewals.

In the event that an agency elects to transition the functions of WHEAP related activities to a different entity, agencies shall notify the division within 30 days of the intent to change activities. In addition to the notification, the agency shall submit a transition plan that addresses how the activities of the WHEAP transition will be addressed. The transition plan shall include, but not be limited to, how the program will continue uninterrupted, how the new entity staff will be trained, if the agency intake site will change, and how the new intake operations will be communicated to applicants.

Expenditures for these allocated funds are invoiced for reimbursement by agencies on the HE+ System. Only staff with appropriate security clearance can access the contract/invoice module of the HE+ System.

The Division does not provide a specific tracking tool for the agency to manage the reporting of expenses. The Division recommends that 100% time study be used for the most accurate method to track WHEAP activities.

Furnace services expenses, like regular WHEAP benefits, are paid by the Division and not from funds allocated to the WHEAP agency.

For accounting purposes, the Catalog of Federal Domestic Assistance (CFDA) Number of the LIHEAP program is 93.568.

The State Grant Identification number for the Utility Public Benefits program is 505.371.

#### 8.3.2 Out of State Travel

Agencies wishing to use WHEAP funds (LIHEAP or Public Benefits) to have more than two staff attend out-of-state conferences or training must obtain prior approval from the Division. Agencies must submit a request, at least one month in advance, identifying the staff they wish to send and a justification for their attendance. The justification must include estimated total costs, reference to the specific workshops/programs they plan to attend and an explanation of how this knowledge will contribute to the agency's performance or quality of work. Any travel out of the country for WHEAP purposes must be reported to the Division in advance of the travel.

## 8.3.3 Computer Equipment, Connections, Security & Costs

The agency shall be responsible for the following:

1. All costs for hardware, software, and internet access required for WHEAP delivery. An agency shall have all Information Technology (IT) hardware (equipment that allows a user to create, store, or transmit data), software (computer application/program or data) and service subscriptions, including but not limited to email hosting and desktop support, necessary to meet general requirements for program management and financial reporting. Computers, laptops, tablets, and desktop personal computers (PC)s shall use a version of Microsoft (MS) Windows® operating system. Productivity software loaded on computers shall be a version of MS Office® compatible with Division software. Transmittal of MS



Office® files shall be in MS Word, MS Excel, MS PowerPoint, MS Access (Wx Assistant), or Portable Document Format (PDF) file format. Other file formats may be transmitted upon request of the Division. All data handling shall be in compliance with <a href="Appendix A">Appendix A</a> – Agency Guidelines for Handling Sensitive Data.

- a. An agency shall have reliable access to the Internet at a sufficient connection speed to meet business requirements. An agency shall make their own hardware and software purchases. An agency shall track and maintain all IT hardware, software, and services that are purchased with WHEAP funds. An agency shall procure all IT hardware, software and services in accordance with all applicable federal and state guidelines and laws.
- b. An agency shall make full specifications and disclosure of IT hardware, software, and services available to the Division upon request or during monitoring;
- 2. Communication and cooperation with the Division for the installation and maintenance of all computer equipment specifically related to WHEAP;
- 3. Appointing no more than two\* System Profile Management Administrator (PMA) with a written request to the Division via the HE+ Help Desk (<a href="mailto:heat@wisconsin.gov">heat@wisconsin.gov</a>), who is responsible for:
  - a. Notification to the Division System Administrator(s) in writing (e-mail is acceptable) of any changes to these appointments;\*\*
  - b. Creation of new, and maintenance of current, HE+ System contacts/permissions/user profile/position information (including review of the user profile name for appropriateness upon creation) within their county/tribe, including signed security agreements for each HE+ System user;
  - c. Maintenance of current HE+ System user profiles including:
    - i. Inactivating user profiles that will be off the HE+ System for more than two weeks on vacation, maternity leave, summer leave, or any other reason.
- 4. Access for filing administrative invoices is limited to county/tribe staff only.; and
- 5. Assigning the "Supervisor" security permission to at least one WHEAP staff person of a supervisory role within the agency (or designated by a person with a supervisory role). See Section 3.1.10 for more information.

# 8.3.4 Allowable Costs

This section provides a description of allowable costs, by contract line. The agency shall expend funds provided under the contract in accordance with these policies.

## 8.3.4.1 LIHEAP Operations Accounts

1. Allowable program operations costs include:

<sup>\*</sup>If an exception is needed to this limit, please contact the HE+ Help Desk. This request must be submitted on an annual basis.

<sup>\*\*</sup>The creation of or changes to a PMA in the HE+ System must be completed by the Division of Energy, Housing and Community Resources.



- a. Staff costs to accept and process HE+ Applications throughout the contract period,
- b. Verifying application information,
- c. Processing applications, including entering data into the HE+ System,
- d. Outreach activities as defined in Section 8.3.4.3, and
- e. Other costs not covered by crisis services.

## 2. Allowable administrative expenses include:

- a. Supervisor and Coordinator salary and fringe,
- b. Travel for meetings and training,
- c. Clerical support salary and fringe,
- d. Supplies, services, and equipment,
- e. Indirect shared agency administration costs, and
- f. Fraud investigation.

#### 8.3.4.2 LIHEAP Crisis Services

- 1. Allowable costs include:
  - a. Staff salaries, fringe benefits, and travel associated with providing crisis services,
  - b. Costs related to providing furnace services, and
  - c. Other costs directly related to providing crisis services.
- 2. Allowable non-staff costs include:
  - a. Purchase/provision of educational or informational materials that are related to the provision of Emergency Crisis or Prevention Assistance services, and
  - b. Require description of item or service provided, date and cost of item/service.
- 3. Costs not allowed include:
  - a. Indirect administrative expenses (see Section 8.3.4.1)

## 8.3.4.3 Public Benefits WHEAP Operations-Outreach and WX Operations-Outreach

These two contract account lines may be used to support the same costs, as detailed below:

## Allowable costs include:

- 1. Allowable costs detailed in Section 8.3.4.1, LIHEAP Operations,
- 2. Allowable costs detailed in Section <u>8.3.4.2</u>, LIHEAP Crisis Services,
- 3. The cost of staff salaries, fringe benefits, and travel associated with staff time spent on outreach activities for all Home Energy Plus (HE+) programs including Program Services (Water Conservation & Furnace) and Weatherization,
- 4. Providing HE+ Program information to potentially eligible groups or individuals through home visits, site visits, group meetings, etc.,
- 5. Distributing posters, flyers or other informational material regarding HE+ Programs to potentially eligible persons,
- 6. Providing information on eligibility criteria, application sites, etc. to local media,



- 7. Producing and mailing information to potentially eligible persons, ensuring that the State of Wisconsin, Department of Administration, HE+ Program is referenced on any published material.
- 8. Coordinating with other local program offices serving persons in targeted low-income groups, including arranging for WHEAP information and/or application intake to be provided in conjunction with other programs, and
- Preparing and disseminating early applications and the costs associated with that preparation and dissemination, including intake, and entry into the HE+ System, of early applications.

#### 8.3.5 Disallowed Costs

Disallowed costs are expenses, as determined by the Division, which are not reimbursable using WHEAP contract funds. If the Division cannot determine if an expense is allowable because of inadequate records or documentation, the questioned cost may be disallowed. Agencies shall reimburse the Division for the amount of any disallowed cost.

## 8.3.6 Performance Measurement

The Division expects each WHEAP agency to administer WHEAP in a timely and professional manner. The following performance measures will be annually expected of the agency.

- Agency shall maintain or increase the current WHEAP paid caseload compared to prior year's caseload;\*
- 2. Agency shall meet the contract spending requirements as outlined in Section 8.2.7.1;
- 3. Agency shall conduct general and furnace quality assurance reviews as outlined in <a href="Chapter 5">Chapter 5</a>;
- 4. Agency shall coordinate outreach/intake activities with other local organizations;
- 5. Agency shall develop and coordinate outreach efforts and referral activities with their Weatherization agency.

## 8.4 Financial Standards

Each WHEAP agency is held to certain financial standards and is required to maintain financial records in accordance with the guidance in this Section. WHEAP agencies are subgrantees of Federal Block Grant funds and grantees of State of Wisconsin Public Benefit funds and are accountable for expenditures of the funds allocated to them.

#### 8.4.1 General

Agencies shall establish and maintain fiscal control and accounting procedures as set forth in Wisconsin Statutes §46.036(4). These procedures shall be in writing and consistently applied. Agencies shall maintain account books on a double entry basis. Accounting will be on a modified accrual basis at a minimum. Full accrual basis accounting is encouraged. Agencies shall maintain separate accounting for each contract. The agency shall maintain records that separately track and

<sup>\*</sup>Documentation of conducted outreach activities, marketing efforts, agency Plans and local intake methods shall be made available upon request.



account for expenses to each account line of the contract. There shall be a system for allocating common expenses among operational account lines.

If work is performed by the agency's staff, charges to WHEAP will be made on an actual cost basis. Agencies are required to notify the Division of any potential financial conditions that could adversely impact program operations. Examples of these conditions include pending legal activity; organizational cash flow shortages; and/or allegations or investigations of fraud or embezzlement. Failure to notify the Division of potentially adverse financial conditions is grounds for immediate termination of the contract.

#### 8.4.2 Source Documentation

Agencies shall maintain at least the following documentation of contract funds:

- 1. Approval to secure funds,
- 2. Applications and requests for modifications,
- 3. Signed contract and modification approvals,
- 4. Board minutes, and
- 5. Proof of receipt/deposit slip, when applicable, including date, amount, source of funds, and identification of receipt of funds in cash ledger.

## 8.4.3 Expenditure Documentation

Agencies shall maintain, at a minimum, the following documentation of expenditures:

- 1. Invoice/Purchase Order/receipt,
- 2. Travel authorization, and
- 3. Employee contract or time records approved by employee and supervisor.

#### 8.4.4 Financial Record Retention

Agencies shall retain all financial records for five years.

All records maintained in accordance with the operation of WHEAP shall be available to the Division on request for inspection, examination, excerpting, transcription, or audit. The minimum acceptable records include, but are not limited to:

- 1. Documentation of employee time;
- 2. Documentation of all materials, supplies, and travel expenses;
- 3. Inventory records and supporting documents for allowable equipment purchased to carry out the scope of work of the program;
- 4. Documentation and justification of the methodology used for any in-kind contributions;
- 5. Justification supporting allocation of space charges or other indirect cost allocation methods; and
- 6. Any other records that support charges incurred.

Agencies shall maintain sufficient segregation of accounting records for this program separate



from other contracts, projects, and programs.

# 8.4.5 Open Records/Public Records

An agency is subject to State Public Record laws, (Wisconsin Statutes §19.21-19.39). These laws relate to record retention by the agency and to the provision of information (known as "complete public access"). Division policy is to:

- Forward a written copy of all records requests to DOA, Division of Energy, Housing and Community Resources or directly to DOA, Office of the Secretary, Legal Office, PO Box 7864, Madison, WI 53707-7864, and
- 2. Provide records to requestors, as required; or
- 3. Request that DOA coordinate the response to the records request.

#### 8.4.6 Financial Audits

Agencies shall ensure that financial audits are:

- 1. Conducted annually,
- 2. Conducted by an independent auditor,
- 3. Timely,
- 4. Submitted to the Division as soon as available. Audit reports, including any accompanying letter of findings should be emailed as a text searchable, unsecured PDF file to: DOABFMSingleAuditCoordinator@wisconsin.gov.
- Conducted in accordance with federal laws and regulations, OMB Circular A-133 and the State Single Audit Guidelines (SSAG) issued by the Wisconsin Department of Administration. Current SSAG for DOA is available at: https://doa.wi.gov/Pages/StateFinances/State-Single-Audit-Guidelines.aspx

# 8.5 Administrative Requirements

Each WHEAP agency is required to operate WHEAP under the administrative standards in this section.

## 8.5.1 Conflict of Interest Policy

Each WHEAP agency shall develop\*, implement, and keep on file a plan/written policy for managing potential conflicts of interest. Conflicts of interest covered by the plan/written policy shall include all situations, actual or perceived, when the agency, agency staff, members and relatives of the agency's board of directors, and friends and relatives of agency staff may receive personal benefits or employment from WHEAP. At a minimum, the policy shall set forth the procedures and steps the agency will follow to address the following situations:

- Agency staff processing WHEAP applications for which they have a familial, financial, or other connection to the case head, household members, landlord, or other party that would benefit either directly or indirectly from approval of the application; and
- Hiring and supervising of agency staff to avoid nepotism

<sup>\*</sup>WHEAP agencies may use existing conflict of interest plans to implement WHEAP. The policy shall be made available



to the Division upon request.

# 8.5.1.1 Conflict of Interest Policy/Non-Disclosure Agreement

All agency staff who work with WHEAP are required to agree to the Conflict of Interest Policy/Non-Disclosure Agreement. All staff with HE+ System access will be prompted to agree to the Conflict of Interest/Non-Disclosure Agreement Form upon gaining access to the HE+ System. This agreement is for the duration of employment with the agency. For staff who work with WHEAP, but do not have HE+ System access, agencies shall require staff members to sign a Conflict of Interest policy. A copy of the Conflict of Interest/Non-Disclosure Agreement Form may be requested from the Division. This agreement is for the duration of employment with the agency and shall be retained by the agency for the duration of the employee's employment.

Prior to performing intake or completing WHEAP related activities, every worker must agree to the Conflict of Interest Policy/Non-Disclosure Agreement that contains the following:

## **Conflict of Interest Policy/Non-Disclosure Agreement**

No person who is a WHEAP agency employee, or agent or consultant, and who performs or has performed any functions or responsibilities with respect to Wisconsin Home Energy Assistance Program (WHEAP) contract activities, may obtain a personal or financial interest or gain an unfair advantage of the program. This does not preclude any individual from applying for the Home Energy Plus programs. Furthermore, the same person may not have an interest in any WHEAP-related contract, or WHEAP-related proceeds, either for themselves or those with whom they have family or business ties, during their tenure. Receipt of earnings from the local WHEAP agency by employees shall not be considered a conflict of interest, but otherwise employees of the local WHEAP agency shall be fully bound by the requirements of this Policy. Upon request, the Department may make exceptions to this requirement after full disclosure and where the Department determines, in consultation with federal agencies if necessary, that such an exception is in the best interest of the State and is not contrary to state or federal laws.

## 8.5.1.2 Processing Applications of Relatives and Friends

If the applicant is an employee of the agency, a relative or household member of an employee, a former employee of the agency, or a close friend of the person certifying/entering the application, applications must be reviewed and approved by a staff person at a supervisory level or higher. A staff member holding the HE+ System "Supervisor" permission must enter the application in the HE+ System and enter an HE+ System Note indicating the manager/supervisor who reviewed the application. This restriction applies to any actions related to the individual's Regular Benefits, Crisis Assistance, and HE+ Program Services applications.

#### 8.5.2 Lobbying Restrictions

WHEAP funds may not be used to influence federal contracting nor financial transactions. This restriction includes, but is not limited to, the following activities:

 Agencies may not use federal funds (including LIHEAP) to pay a person(s) to lobby on their behalf with the Executive or Legislative Branch in connection with the award of a specific contract, grant, or loan.



- Agencies receiving more than \$100,000 in federal funds per year must file with the U.S.
   Department of Health and Human Services an annual statement certifying that they will abide by these restrictions.
- Agencies must disclose any payments made to a person(s) lobbying, as defined above, even if no federal funds are used to make the payment.
- The website for the form for agencies to disclose lobbying activities:
   https://www.state.gov/key-topics-bureau-of-democracy-human-rights-and-labor/lobbying-disclosure-and-certification/.

## 8.5.3 General Record Retention

Agencies shall retain all paper WHEAP records for five years unless already retained as an upload to the HE+ System.

The agency must maintain the following records as required in other sections of this manual including:

- 1. A record management system that retains documents for a period of five years from the date an application is submitted. Agencies may retain records, locally, in an electronic format to reduce storage space needs (see <u>Appendix A</u>). The Division maintains the record retention of any documents that are uploaded to the HE+ System. If forms are required to be retained longer than five years, as outlined in the manual, the agency must retain those particular forms in accordance with the WHEAP Manual.
- 2. Files on all applicants including, the entire completed (if applicable), signed and certified application form(s) DOA-9549.
  - a. If the application is completed interactively, only the applicant signature form must be in the retained as a document upload.
- 3. Any documents used to verify income (paystubs, wage print-outs, Self-Generated Income Report Form, tax forms and/or schedules, etc.). SSNs on the tax records shall be redacted by crossing out all but the last four digits of the SSNs on all forms and schedules provided. Bank routing information and tax preparer ID shall also be redacted. This shall be done prior to uploading these documents to the HE+ System.
- 4. When applicable, retain Authorized Representation and/or Power of Attorney (POA) documentation as a document upload.
- All records associated with the requirements set forth in the HE+ Furnace Program Manual.
- 6. The agency may retain additional records beyond the minimum established and shall be handled within the specified requirements of <a href="Appendix A">Appendix A</a>, "Agency Guidelines for Handling Sensitive Data."
- 7. Conflict of Interest/Non-Disclosure Agreement Forms for WHEAP staff without HE+ System Access (see Section 8.5.1.1).
- 8. All signed and completed WHEAP Affidavits of Lost, Destroyed or Stolen Benefits forms as a document upload to the associated application "Other WHEAP Documents" repository in the HE+ System.

Electronic files of the following are maintained on the HE+ System:



- 1. Registered fuel suppliers; and
- 2. Weekly check registers for payments through the heating, Public Benefits, crisis, and HE+ Program Services programs.

# 8.5.4 Staffing

The agency must maintain staffing adequate to provide:

- 1. Program information year-round on <u>both</u> WHEAP and Crisis Assistance;
- Ability to take applications throughout the calendar year to assist applicants with home energy needs and to assist Weatherization agencies in determining eligibility of potential Weatherization recipients;
- 3. Outreach activities throughout the calendar year;
- 4. Emergency Crisis Services during the heating season;
- 5. Crisis Prevention Services year-round; and
- 6. HE+ Program Services year-round.

# 8.5.5 HE+ System Security

- The WHEAP agency must appoint a Profile Management Administrator (PMA) with a
  written request to the Division via the HE+ Help Desk. Any changes to this appointment
  require written notification to the Division. The creation of or changes to a PMA in the HE+
  System must be completed by the Division. The PMA is responsible for:
  - a. Creation of new, and maintenance of current, HE+ System contacts, permissions, user profiles, and position information (including review of the user profile name for appropriateness upon creation) within their agency;
  - b. Maintenance of current HE+ user profiles including:
    - i. Inactivating user profiles who will be off the system for more than two weeks on vacation, maternity leave, summer leave, or any other reason, and
    - ii. Immediately inactivating contacts and user profiles who have been terminated, retired, quit, or otherwise have left the program.
- 2. Any staff with a user profile has the responsibility to maintain their user login name and password as confidential. Persons' "Login Name" and password shall never be shared, even with other WHEAP staff. The user logged in is responsible for all activity occurring under this user profile. All activity in the HE+ System is recorded and time stamped according to the user login.

#### 8.5.6 Coordination

Agencies must coordinate efforts with other local agencies serving low-income households and/or providing energy assistance. This includes working with the vendors who are not participating in Public Benefits. Agencies are required to have a completed Program Operations and Community Service (POCS) Plan using the Division-provided template (located on the HE+ TTA website under WHEAP > Forms). Each agency is required to review their current plan and update the date reviewed section on the plan before the start of each program year. The POCS Plan should indicate what other community resources/stakeholders play a role in this outreach effort and



identify key stakeholders that the agency coordinates efforts/referrals with. In addition, the list should indicate the local agency's contact person and the resource services provided. The goal of this plan is to provide agencies with a means of establishing their planned approach for conducting WHEAP outreach and achieving an effective and inclusive community outreach partnering with local organizations on ideas and culture to reach the entire community. Agencies are required to make the plan available to the Division upon request.

#### 8.5.7 Publications

The Division prints a variety of informational materials that are useful for outreach activities. Each July, orders are solicited from agencies for a program year's supply. Limited quantities are available at the Division for small orders of additional print materials. Requests can be sent to the HE+ Help Desk.

NOTE: Most forms and documents are available for print via the Division website.

## 8.5.8 Home Energy Plus and Co-Branding Logos

Agencies may develop, print, and publish their own WHEAP informational materials such as brochures, program marketing and outreach materials, and websites. Program materials prepared by the local agency that will be available to the public shall:

- 1. Include information on all HE+ programs,
- 2. Identify the program as being administered by the State of Wisconsin HE+ Program, and
- 3. Include the two official logos: the HE+ logo and the county/tribe-specific co-branding logo

The following guidelines apply whenever using HE+ logos:

- Changes or additions to the logo are not allowed.
- Program materials prepared by the local agency that will be available to the public shall include the logo and identify the program as being administered by the State of Wisconsin HE+ Program.
  - o Documents used only for internal purposes do not require a logo.
- Outreach materials will be reviewed as a part of the monitoring process and shall be made available at any other time to the Division upon request.
- Agencies are not required to seek preapproval of marketing materials unless otherwise instructed.
- Agencies shall not use their own logos in lieu of the HE+ logo.

The official HE+ logo and further usage guidelines can be obtained on the HE+ TTA website (<a href="https://homeenergyplus.slipstreaminc.org/">https://homeenergyplus.slipstreaminc.org/</a>), under Administration > HE+ Logos. The co-branding logo is specific to each county/tribe and is distributed directly to each agency from the Division. It is each WHEAP agency's responsibility to advise the Division of any changes with organizations identified in their logo. Contact the HE+ Help Desk if a copy of the co-branding logo is needed.

# 8.6 Monitoring

The agency is responsible for participating in Division-conducted Administrative Reviews.



Participation includes, but is not limited to:

- 1. All requested individuals must be present at the specified times during Administrative Reviews,
- 2. Providing the Division designee(s) with internet access,
- 3. Providing the Division designee(s) with access to program-related electronic files and program-related paper files,
- 4. Providing the Division designee(s) access to other program-related information as requested, and
- 5. Responding to Division requests and recommendations within the established timeframes.

The Division conducts WHEAP Desktop Monitoring of heating and non-heating assistance, Crisis Assistance, furnace services, outreach, and alternate intake. The agency is responsible for any Division requested follow-up resulting from Desktop Monitoring.

The local agency is responsible for regular monitoring of heating and non-heating assistance, Crisis Assistance, furnace services, outreach, and alternate intake.

# 8.7 Disaster Planning

In the event that a disaster prohibits all or some of the normal functions of program administration, the agency disaster plan directs the continuance of essential services. Agencies are required to make the plan available to the Division upon request.

## 8.7.1 Local Agency Continuity of Operations Plans

Agencies are required to maintain the most up-to-date plan on file and make the plan available to the Division upon request. WHEAP agencies are all required to develop and maintain the continuity of operations plans. Each entity is responsible for sharing the completed plan with applicable stakeholders and fuel providers to inform them of the procedures in case of a disaster or emergency.

Local agencies must provide to the Division the names of their primary emergency contact and two back-up contacts. The document(s) must include such contact information as may be necessary to ensure a contact is available 24 hours per day, every day including weekends and holidays.

#### 8.7.2 Division Plan

In the event a disaster occurs that affects the ability of the Division to provide services in the normal way, a plan has been developed to identify ways to maintain essential services. The primary actions are outlined as a means of notifying local agencies about what to expect.

# 1. State Level Actions

The Division will send letters to all State-approved WHEAP vendors explaining the Division contingency plan. The letter will specifically notify them that contractors are authorized by the State to pre-authorize payment for deliveries in case of failure of the state benefit payment system or the telecommunications links with the state computer system or the Division.



## 2. Contractor Requirements

- a. Contractors are required to report any changes in writing (e-mail is acceptable) to the:
  - i. Name of the WHEAP county/tribal Director,
  - ii. Name of the WHEAP Coordinator,
  - iii. Physical address,
  - iv. Mailing address,
  - v. Phone numbers (including extension(s) if applicable),
  - vi. Fax numbers, and/or
  - vii. Email addresses reported to the State for statewide broadcast messages.
- b. Contractors are required to have voicemail and/or an answering machine message available year-round with the following information available to the caller:
  - The emergency number to call for heating emergencies from October 1 through May 15;
  - ii. Office hours for applying for energy assistance/Crisis Assistance and where to apply from October 1 through May 15;
  - iii. From May 16 through September 30, a message that the heating season/Emergency Crisis Assistance is over but there may be Prevention Assistance available and how to apply;
  - iv. When it is time for early applications, a message describing when early applications begin and how to apply.
- c. Contractors are required to have the following plans in place in the event of a disaster:
  - Contractors shall contact their State-approved WHEAP vendors by letter outlining their procedures in case of business failure to ensure preauthorized payment for deliveries;
  - ii. Contractors shall be expected to have in place a back-up system for communicating with or reaching fuel suppliers in an emergency if the phone system is inoperative;
  - iii. Contractors shall have in place after-hours emergency service procedures. The personnel responsible for after-hours service shall be trained on disaster emergency procedures, including the pre-authorization procedures for guaranteeing emergency payments in cases of a disaster;
  - iv. Contractors shall have procedures to handle emergencies during normal hours of operations if the operations of the local office are interrupted;
  - Contractors shall coordinate with the local office of emergency government, local law enforcement agencies, and other local service providers to ensure they are aware of WHEAP's procedures to assist in emergency situations involving heating fuel or utility service;
  - vi. Contractors shall have paper applications in their offices to take applications, determine eligibility, and to guarantee pre-authorized payments for deliveries:



- vii. Contractors shall contact the local emergency government office and other nonprofit agencies informing them of their procedure in case of a disaster; and
- viii. Contractors shall contact the local emergency government office to determine the emergency government office's procedures in the event of a disaster, and to coordinate efforts.

#### 8.8 Public Benefits

Public Benefits are funded by fees collected by participating electric vendors from residential and commercial customers and remitted to the Department of Administration/Division of Energy, Housing and Community Resources.

Electric vendors have the following responsibilities:

## Municipal Utilities and Electric Cooperatives

Municipal utilities and electric cooperatives that participate in the Public Benefit program are invoiced by the Division on a quarterly basis per the following schedule:

Quarter 1 July – September
Quarter 2 October – December
Quarter 3 January – March
Quarter 4 April – June

Municipal utilities and electric cooperatives that choose to operate a Commitment to Community Program shall comply with State of Wisconsin statutes associated with the Commitment to Community Program.

## Non-Municipal Utilities

Investor-owned utilities are required to participate in the Public Benefits program. Utilities are required to provide an annual fee schedule to the Division. The Division then establishes a semi-annual invoice based on this schedule. Payments are due to the Division by the 15<sup>th</sup> of each month.

All participating municipal, cooperative, and non-municipal electric vendors shall comply with all fee scheduling, billing requirements and payment deadlines within 30 days from the last invoice period. Vendors that do not comply are subject to inactivation in the HE+ System. A vendor inactivation results in the Division withholding WHEAP benefits/payments issued to the vendor on behalf of eligible customers. Vendors will remain inactive until the vendor has met all the requirements set by the Division.



# **Chapter 9 | Contract Invoicing**

## 9.1 General

Allowable costs are described by line in Sections 8.3.4.1 through 8.3.4.3.

# 9.2 Invoice Filing Responsibility

It is the responsibility of the WHEAP agency to invoice and/or approve expenses per the State and agency contract that is from October 1 through September 30 of each year. The last day for a local agency to submit an invoice for the contract that ends on September 30 is at the close of business on November 30 of each year, when a final close-out contract extraction will occur. Invoices submitted after this date for a previous contract year will not be processed for payment.

Agencies must submit a final "Close Out" invoice regardless of their contract balance or existence of expenses. The "Close Out" invoice must be submitted and in "Approved by Primary" status prior to close of business on November 30 of each year. The "Close Out" invoice is only available when invoiced expenses have been paid through September. To create a closeout invoice, select "Add a Close Out Invoice" from the action ribbon on the Home Energy Plus (HE+) System and follow the same steps for "Creating an Invoice".

# 9.3 Guidelines for Invoicing

The WHEAP agency is required to invoice for reimbursement of expenses in the HE+ System. WHEAP expenditures shall be invoiced monthly.\* Expenses may not be invoiced until the first of the following month (example: October expenses may not be entered into the HE+ System until November 1).

- Expenses submitted by each WHEAP agency shall be actual expenses.
- Monthly expenses shall not be invoiced for 1/12th of the contract.
- Expenses for the previous month must be entered (invoiced) in the HE+ System by the 30th of the current month.
- The HE+ System will not allow creation of more than one invoice per extraction.
- If some or all of a month's expenses have not been invoiced and subsequent invoices
   (months) have been processed, the expenses not invoiced must be added to an invoice
   submitted later by adding a correction and selecting the month the expenses were incurred.
   Example: If the most recently processed invoice has a "Report Period To" date of March
   and the expenses not invoiced are from January, the January expenses need to be
   included with the April invoice.
- An invoice can be edited until the point of extraction.
- "Zero" shall be entered as an amount if there are no expenses to be invoiced for a specific
  account line for the current invoice. A note shall be entered to explain any "zero" entries to
  provide an explanation to the Division. Notes are not required if the account funding has
  been fully expended.

<sup>\*</sup>Any WHEAP agency with an initial contract allocation of less than \$30,000 shall invoice for reimbursement as needed but must remain in compliance with Article 25 Financial Management of the WHEAP contract. The Division encourages monthly invoicing.



- Once all amounts have been entered, the invoice is ready to be approved. Approval is only available to authorized agency staff.
- The individual approving the invoice in the HE+ System shall not be the same individual who created the invoice in the HE+ System\*\*.
- Agency staff shall notify their county/tribal Treasurer, to whom the payment is issued, when an invoice has been marked as "Approved by Primary". This ensures that payments are promptly processed.

Only invoices with "Approved by Primary" status will be processed for payment. It is the responsibility of the local agency to ensure that all invoices are in "Approved by Primary" status before the final contract closeout extraction. Invoices remaining in "Draft" status following the contract closeout period will not be paid.

# 9.4 Reimbursement Payments

Agencies are required to receive contract payments electronically. To sign up for electronic payments, agencies must submit a completed form DOA-6456, Authorization for Direct Deposit. Agencies shall also provide either a "VOID" check or a letter from their banking institution on the bank's letterhead confirming the account and routing numbers. Do not provide a starter check. The completed form and accompanying document(s) may be emailed to: DOADLDEHCRFiscal@wisconsin.gov

The Department conducts invoice reimbursement payments daily.

The Division shall not provide reimbursement if the maximum amount of the contract has been paid to the agency. Agencies shall not submit expenses to any contract account line once allocated funds have been expended. Once a contract account line(s) has been expended, agencies should continue to submit monthly invoices with \$0 entered for the expended account line(s).

Payments which exceed allowable costs incurred and paid by the agency pursuant to the terms of the WHEAP contract, if outstanding at the expiration of the WHEAP contract, shall be repaid to the Division within 60 days of the expiration date of the WHEAP contract. The Division has the authority in accordance with State procedures, to reconcile payments and report expenses. Payments shall be used only for current WHEAP contract year expenses.

<sup>\*\*</sup>If an exception is needed to the two-tier approval, please contact the HE+ Help Desk.



# **Chapter 10 | Definition of Terms**

## administrative expenses

The general costs associated with administrating the Wisconsin Home Energy Assistance Program (WHEAP), including direct and indirect costs for:

- 1. Planning,
- 2. Determining eligibility, and
- 3. Issuing benefits.

## Adult Family Home (AFH)

A licensed, private residential home where 1-4 adults not related to the operator reside and receive care, treatment, or services (that are above the level of room and board). Adult Family Homes, as defined by the Department of Health Services, are eligible dwellings and all household members and their income are to be counted in the application. Caregivers generally receive separate per diems for room and board and care. Any per diem for room and board is ignored, while a per diem for care shall be counted as wages for the caregiver of the household. For additional guidance, please contact the HE+ Help Desk.

## agency

The term agency, as used in this program, normally refers to the county department, tribal entity, or non-profit organization that administers WHEAP.

#### annualized income

Income calculated to reflect an average monthly amount. Refer to Section <u>2.3.7</u> and <u>Appendix B</u> for specific guidance on which income types should be annualized.

#### applicant

The person whose name is entered in Field 2 on the application form (DOA-9549). Applicant and case head are the same and are used interchangeably for purposes of this manual. An eligible case head must have a validated SSN and be a U.S. citizen or an eligible non-citizen. A case head must be 18 years or older, or be a **minor head-of-household** (see definition), or be a child who meets one of the following exceptions:

- All adults in the household are ineligible non-citizens; and
  - o The dependent child is either a citizen or an eligible non-citizen; and
  - The child has a Social Security number (SSN); or
- An emancipated minor over 15 may be a case head if the minor is living independently and:
  - o Is married, or
  - o Was married, or
  - Is principal support of a child, or
  - Has visible independent means of support and cannot be claimed as a dependent on income tax of someone not in the household.

#### application

The form used to apply for energy assistance. The HE+ Application, Form DOA-9549, is the paper



form version of the application.

- A <u>complete application</u> is an application which has all required information documented and/or verified by the applicant, has been signed and dated by the applicant, has all required information verified by an authorized local agency staff worker, and is signed and dated by the worker.
- An <u>incomplete/"Pending" application</u> is an application that is missing one or more of the elements required to be a complete application.
- A <u>minimum application</u> is an application that contains at least the applicant's name, SSN, date of birth, gender, type of dwelling, housing type, residence and mailing address, and date of application. This is the minimum to be included to be considered an application for purposes of this program. An application received without an SSN for the case head does not meet the minimum application requirements.
- An <u>early application</u> is an application for the upcoming heating season with an application date prior to October 1. Early applications may not be taken until after a date has been determined by the Division. Early applications will not be paid until the first extraction of the new program year. While emphasis shall be given to "fixed income" households, any income type qualifies for an early application.
- An <u>abbreviated application</u> is an application for households whose only income is fixed income, who have had no change to the household members or type of income reported from the previous year, and who have not moved since the previous year. A new Certification Page is not required. The most recently signed Certification Page shall be uploaded.
- An <u>automated application</u> is an application processed by the Division/HE+ System.
   Automated applications are for previous year recipient households whose income is from Social Security and/or Veterans Benefits, who have heat and non-heating electricity provided by an investor-owned utility (IOU) and who have the same household demographics as the previous year.
- An <u>online application</u> is an application that is submitted by the customer through the online energy assistance application portal (<a href="https://energybenefit.wi.gov">https://energybenefit.wi.gov</a>).

#### application number

The application number is an HE+ System-generated identifier attached to an application. This number is used, in part, to ensure the household with the case head is not paid more than one regular heat or electric benefit in a program year.

## assisted living facility

A living unit where a third party assists the resident with one or more of the resident's basic daily activities. Basic daily activities include, but are not limited to, meal preparation, food shopping, regular medical care (shots, rehab, etc.), transportation assistance, house cleaning, or home maintenance. See also definition for Adult Family Home (AFH). If the applicant is responsible for energy costs (heat and electric), lives in an independent apartment within an assisted living complex, and pays full market rent, consult the HE+ Help Desk for a determination of the status of the dwelling as an eligible or ineligible assisted living unit.



## authorized representative

A person who has signed an Affidavit of Agent, and who is listed as the authorized representative on the Authorization of Representation/Affidavit of Agent Form.

# benefit(s)

The heating and/or non-heating electric assistance payments, Crisis Assistance payments, or furnace services provided to applicants.

#### benefit formulas

The formulas used to determine the amount of the heating and/or non-heating (or total home energy) assistance payments.

## **CARES**

Client Assistance for Re-employment and Economic Support (CARES) is a statewide automated, integrated, computerized system. The CARES system supports the major economic support programs of Wisconsin Works (W-2), Temporary Assistance for Needy Families (TANF), FoodShare ("food stamps"), medical assistance, Healthy Start, Employment and Training programs, and the Learn-fare Case Management.

case head - See applicant

## categorically eligible (cat eligible or CE)

For a household to be categorically eligible, all household members must be recipients of either W-2/TANF, FoodShare ("food stamps"), or SSI in the prior month income test period.

# copayment agreement

An agreement between the agency, applicant, and energy supplier in which the agency agrees, as a prevention service, to pay a specified amount to the energy supplier. See <a href="Chapter 4">Chapter 4</a>. The agency payment is contingent upon:

- The applicant making their agreed payment (referred to as the copayment) to the energy supplier; and
- The energy supplier continuing to provide services to the household.

#### **Crisis Assistance**

The part of WHEAP providing assistance and/or services to households experiencing energy emergencies or which are at risk of an energy emergency.

**direct vendor** – See registered supplier and fuel supplier

#### disability

A self-declared physical or mental impairment or a designation made by a state or federal program that:

- Substantially limits one or more of a person's major life activities; or
- Results in the person receiving either Veterans or Social Security disability benefits.



#### **Division**

The Division of Energy, Housing and Community Resources in the Department of Administration of the State of Wisconsin.

# document upload

Retaining copies of documentation to the HE+ System by using the associated document upload feature.

# dwelling unit

A structure, including a stationary mobile home, apartment, group of rooms, or a single room occupied by a household that has an identifiable site address such as a fire number or street address. A United States Post Office Box number is a mailing address and does not identify a dwelling unit.

early application - See application

#### **Earned Income Tax Credit**

A refundable federal or state tax benefit designed to help low-income workers increase their financial stability and maintain their independence from the welfare system. It is also known as EITC. For the purposes of WHEAP, it is ignored income.

#### economic unit

A person or group of related or unrelated persons who live together in a dwelling unit and jointly share in providing or being provided for the necessities of life for the person(s) in the group. The necessities of life are shelter, heat, and utilities.

NOTE: Persons living in a housing arrangement with their own room and sharing common spaces are all part of a single economic unit.

#### elderly household member

Individuals who are 60 years old or older as of the application date.

#### electric burden

The responsibility for providing the household for all non-heating electric used in the home.

### eligible non-citizen

Certain non-citizen statuses are eligible for WHEAP benefits. Eligible non-citizens include those considered one of the categories listed in Section <u>2.2.2.4</u> of the WHEAP Manual according to the United States Citizenship and Immigration Services (USCIS).

# eligibility determination

The process by which a household's eligibility for WHEAP is assessed. This includes the verification of documentation provided to complete an application and the certification of the correctness of an application.

# emergency

The actual or imminent loss of essential home heating/electricity during the heating season or



during a declared heat emergency in the summer.

#### **Emergency Assistance**

Crisis Assistance funds that provide benefits and/or services to address applicant emergencies. Emergency payments are provided during the heating season for households that are experiencing actual or imminent losses of home heating/electricity. Emergency payments for cooling assistance are provided during the summer months only in cases of extreme heat and with a declaration of a heat emergency.

Agencies may not implement cooling assistance unless a state or local public health official declares a heat emergency <u>and</u> authorization is given from the Division of Energy, Housing and Community Resources. See <u>Chapter 4</u>.

#### energy burden

The responsibility for providing home energy including home heating and home electricity. For example, a household may purchase fuel from a fuel supplier, make undesignated payments in the form of rent, or may heat with wood, etc.

#### energy education

The process whereby individuals and households learn to make choices to use energy efficiently, improve their indoor comfort, and become aware of how their behavior affects energy consumption, energy cost, and health and safety within their homes.

# energy services company (ESCO)

Third-party company that manages the energy consumption of multi-unit residential communities, including measuring usage and invoicing the tenants directly.

#### fixed-income household

A household that receives only one or more of the following income types: SS including SSDI, SSI, dividends/interest, pension, and/or veteran's benefits.

# fuel supplier

A fuel supplier is an individual, partnership, or corporation in the business of supplying energy to customers. Landlords, trailer park owners, and other persons who purchase home energy from a fuel supplier to provide tenants or homeowners with home energy are not considered fuel suppliers.

# government-assisted housing

Housing where tenants pay less than the full costs for their residence because the federal, state, or local government pays a portion of their rent. These housing units limit the tenant rent responsibility to no more than 30% of their income and is usually subsidized by the Department of Housing and Urban Development (HUD). Government-assisted housing includes Section 8, rental assistance, subsidized housing, and most other programs to make housing more affordable to lower income households. Section 42 housing apartments, also referred to as Low-Income Housing Tax Credit (LIHTC), do not meet this definition of government-assisted housing.

#### heating burden

The responsibility for providing all energy used for home space heating.



#### heating/electric costs

The costs of any source of heating/electric in a dwelling unit used for residential purposes. All heating/electric costs for business or any purpose other than the dwelling unit of the applicant are excluded.

# heating season

The period from October 1 through May 15.

# high-risk household

A household with past due fuel bills and/or a household at risk of actual or imminent loss of essential home energy. This may be indicated by disconnect notices, high fuel costs compared to household income, etc.

#### **HE+ System**

The web-based system used to communicate information between local agencies and the Division of Energy, Housing and Community Resources to assist in eligibility determinations, maintain records of cases, and assist in the distribution of energy benefits to low-income applicants. Formerly known as the "WHEAP System".

#### home energy

All fuel sources used in a dwelling unit. It includes all heating costs and non-heating costs. Non-heating costs are often referred to on utility bills as baseload costs (the base costs before heating costs are included).

# **Home Energy Plus**

Home Energy Plus (HE+) is the umbrella term used for the WHEAP and Weatherization Assistance Programs.

#### homeless

An individual who lacks a fixed, regular, and adequate nighttime residence or an individual who has a primary nighttime residence that is:

- A supervised publicly- or privately-operated shelter designed to provide temporary living accommodations, or
- An institution that provides temporary residence for individuals intended to be institutionalized, or
- A public or private place not designed for use as a regular sleeping accommodation for human beings.

#### household

Any person or group of persons living together in a dwelling unit on the application date who directly purchase home energy or make undesignated payments for energy in the form of rent. See also dwelling unit and economic unit.

#### household member

Anyone who, on the date of application, is living in the household and who is not a *temporary* 



household member or considered a household member not included on the application as listed in Section 2.2.6.4. Household members who are temporarily out of the household on the date of the application for reasons such as a vacation or a business trip are still considered part of the economic unit and are counted on the HE+ Application. In addition, those working out of town and not maintaining a separate permanent residence are also considered part of the economic unit. Do not count a person who may have lived in the household during a portion of the prior month but is no longer in the household on the application date; do not count the person or their income to determine total household size or income. A household member with multiple residences shall be included in the household if this is their primary residence. When a household member resides in more than one residence, the WHEAP agency must indicate in HE+ System Notes on what basis they determined the primary residence.

# in-kind rental agreement

Living arrangement where instead of paying rent, the landlord provides a living space and in return the renter completes a working arrangement with the landlord instead of receiving (full) wages.

#### income

All monies received by a household. See <u>Chapter 2</u> for an explanation of which monies are counted as income and which are ignored.

#### **Informational Transmittal (IT)**

A correspondence sent from the Division to notify WHEAP agencies of policy and process changes throughout the program year (PY). Updates sent via Informational Transmittal shall supersede policy and guidelines printed in the current year manual. To receive ITs via email, the agency staff HE+ System Contact must be assigned one of the following roles: "Director", "Coordinator", and/or "Fiscal". Staff without one of these HE+ System roles assigned may access the current and prior year ITs on the HE+ TTA website (https://homeenergyplus.slipstreaminc.org).

#### ineligible non-citizen

Certain non-citizen statuses are ineligible for WHEAP benefits. Ineligible non-citizens include individuals without a USCIS status and non-citizens who do not meet one of the specified categories outlined in Section <u>2.2.2.4</u> of the WHEAP Manual.

#### ineligible dwelling unit

Ineligible dwelling units are units that are not eligible to receive WHEAP benefits. Mobile shelters are ineligible dwellings, and typically include, but are not limited to, tents, campers, and vehicles. Group homes, halfway houses, government facilities (jails, hospitals, and other governmental care facilities), assisted living facilities, transitional housing facilities, abandoned spaces or buildings, and secondary homes are also ineligible dwelling units for WHEAP. WHEAP agencies should contact the HE+ Help Desk when questioning an ineligible dwelling.

#### intake

The process of taking an application to be used for determining eligibility for assistance.

#### interactive interview

An interview with the applicant answering questions as the information is being entered into the HE+ System.



# Low Income Home Energy Assistance Program (LIHEAP)

The federally designated Low Income Home Energy Assistance Program under 42 U.S.C. 8621. The program provides benefits and services to assist low-income households with the costs of energy used for home heating. This federal program has also been referred to as the Low Income Energy Assistance Program.

NOTE: The Division of Energy, Housing and Community Resources calls its program the Wisconsin Home Energy Assistance Program (WHEAP) including the federally funded LIHEAP program and the Wisconsin Public Benefit program. See also Public Benefits.

# Low-Income Housing Tax Credit (LIHTC) housing (also known as "Section 42")

Based on Section 42 of the Internal Revenue Code, this housing program was enacted by Congress to provide the private market with an incentive to invest in affordable rental housing. Tenants of LIHTC housing receive a small reduction in rent from the market rent value. Because the tax credits were awarded to the builder/owner, tenants of LIHTC housing are not considered residents of government-assisted housing.

## match payment agreements

Short-term agreements of one payment where the agency can reserve funding pending a customer contribution. The SPAS and SPBS codes reserve crisis funds. Payment to a vendor is made upon verification of applicant contribution and release of the reserved funds in the HE+ System. No written copayment contract is necessary. Similar to copayment agreements, match payment agreements must be released prior to the last extraction date of the current program year.

#### minimum application – See application

# minimum benefit

For administrative reasons, benefit calculations for amounts under \$30 are not issued a payment. Minimum benefit payment must equal \$30 or greater for the regular or crisis benefits to be issued. When the regular benefit calculation is under the minimum benefit amount, the HE+ System will generate a denial notice stating that "Your heating benefit does not meet the minimum benefit (effective FFY2013 \$30 minimum). Benefit checks are not issued for amounts below the minimum." An applicant is eligible for funding under that associated benefit (heat or PB) if the agency wishes to issue crisis for that fuel type.

# minor head-of-household

A minor (under age 18) who has Head-of-Household filing status for tax purposes. See also applicant for relevancy to WHEAP.

#### mobile home

A manufactured home designed to be towed to a permanent residential site as a single unit or in sections and is equipped and used, or intended to be used, primarily as a year-round dwelling, with walls of rigid un-collapsible construction.

A mobile home continues to be classified as a mobile home even when additions have been made to the structure.



#### naturalized U.S. citizen

Naturalization is the process by which U.S. citizenship is granted to a foreign citizen or national after he or she fulfills the requirements established by Congress in the Immigration and Nationality Act (INA). Naturalized U.S. citizens can provide a Naturalization Certificate or U.S. passport as evidence.

#### non-citizen

A non-citizen is a person who is not a citizen of the United States. Non-citizens may or may not be eligible for WHEAP benefits.

# non-heating costs

The portion of the home energy costs not connected with heating the living space; usually these are electric costs. The costs for lighting, cooking, drying clothes, refrigerators, etc. are included in the non-heating costs.

#### outreach

The activities undertaken to ensure households with the greatest needs receive WHEAP benefits. It includes informing potentially eligible persons about WHEAP, encouraging them to apply, and assisting them with the submission of an application.

#### **PASS** interest

The interest on SSI Plan for Achieving Self Support (PASS) accounts.

#### Person ID

The Person ID is an HE+ System-generated identifier attached to each person. This number is used, in part, to allow rapid location of a case without using the SSN.

#### poverty level

Household income in relation to family size established by the federal government.

#### primary heating fuel

The type of fuel the household customarily uses to heat their home. If more than one fuel type is used in the home, the primary heating fuel is the fuel used the most by the household to heat the home. Primary heating type must reflect the primary heating unit of the dwelling.

#### prevention services

The part of Crisis Assistance that provides identification and assistance to high-risk households. Prevention services are provided year-round.

#### **Public Benefits**

Public Benefits were created as a portion of the "Reliability 2000" bill signed into law on October 27, 1999, the 1999-2001 Wisconsin State Budget, Wisconsin Act 9, s.16.957, Utility Public Benefits. This law was amended by Act 141 in 2005.

# recipient

Applicant who has received WHEAP benefit(s).



# registered supplier

A registered supplier is a vendor providing fuel- or energy-related products or services to participating households. A registered supplier must have an approved Vendor Agreement with the Division.

#### renter

A person who pays rent to the owner (or his/her designee) of the dwelling unit in which the person resides and is not part of the owner's household or economic unit.

#### residence

The dwelling unit the applicant is living in on the application date.

#### room

A room may be a living room, kitchen, dining room, bedroom, family room, den, study, or other. It does not refer to bathrooms, entryways, unfinished basements, hallways, unheated attics and porches, closets, or areas occupied by persons who are not part of the applicant's economic unit. Space used only for business purposes is not to be considered a room for WHEAP purposes.

#### roomer

Person(s) who rents a sleeping room individually from the building owner and shares common living space with other residents of the building. Because roomers share common living spaces, they share an energy burden and are considered to be an economic unit.

# rooming house

A living arrangement in which one or more single sleeping rooms is rented to an individual(s) separately from other residents of the building. Rooming house residents generally share common living areas such as a kitchen. Heat and electric are included in the rent or provided as a separate payment to the landlord.

**self-employment income** – See *self-generated income* 

#### self-generated income

Income, including self-employment, odd jobs, or farm income, that is received directly from one's own business or means rather than as an employee with a specified salary or wage from an employer.

# spouse

A person who is defined as married under Wisconsin law.

#### State

The State of Wisconsin.

#### state median income (SMI)

An income level determined to be the median for households (four-person) in the state. This number is used as a reference point from which to calculate the maximum income level eligibility for households.



#### subsidized-housing utility allowance

In government-assisted housing, the portion of a subsidized housing resident's rent that is applied to heating and/or electric costs, or the amount of rent reduction to permit the resident to directly pay heating and/or electric costs. Do not count sub-housing utility allowances as income.

#### subsidized-housing utility reimbursement

Payment issued by the housing authority either to the tenant or directly to the utility on behalf of the tenant to assist with payment on their heat/utility costs. Do not count sub-housing utility reimbursement as income.

# subsidized housing

Programs operated under the U.S. Housing Act of 1937, the National Housing Act, Section 101 of the Housing and Urban Development Act of 1965, Section 202 of the Housing Act of 1959, Title V of the Housing Act of 1949, or any program listed in the most current State of Wisconsin Inventory of Federally Assisted Rental Housing and the Housing Authority Directory. See also government-assisted housing.

# supplemental benefit

A special heating or electrical assistance payment provided in addition to, or as a second part of, the original heating or electrical assistance benefit.

# **Temporary Assistance for Needy Families (TANF)**

Title I of the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA). The federal block grant program that provides states with the authority and funding to create programs that provide time-limited assistance to needy families with children and promote work.

#### temporary household member

Anyone who is not a permanent resident in the household, whose stay in the household will be less than 30 days beyond the application date. The applicant certifies the temporary household member is not going to be in the home for more than 30 days.

#### transitional housing

Housing facility used to assist the movement from homelessness to independent living. Structure may be an SRO (single room occupancy) building, a congregate living facility, a group home, a regular apartment, or a single-family dwelling. If the applicant is responsible for energy costs (heat and electric), consult the HE+ Help Desk for a determination of the status of the dwelling as a transitional housing unit.

#### U.S. citizen

A person (other than the child of a foreign diplomat) born within the United States or in the District of Columbia, Puerto Rico, Guam, the U.S. Virgin Islands, or the Northern Mariana Islands who has not renounced or otherwise lost his or her citizenship, a person born outside of the United States to at least one U.S. citizen parent (sometimes referred to as a "derivative citizen"), or a **naturalized U.S. citizen**.

# weatherization

The improvement of a dwelling unit to reduce energy consumption. It often includes the installation



of insulation and replacement or modification of the heating system.

# Weatherization operator

An agency that contracts directly with the State to provide weatherization services for low-income households.

# "Withdrawn"

An application that has been withdrawn from the HE+ System at the applicant's request any time prior to extraction. Refer to Section <u>3.4.5</u> for more information on "Withdrawn" applications.



# Appendix A | Agency Guidelines for Handling Sensitive Data

#### General

Contracted agencies shall ensure program employees, both internal and subcontracted, shall take reasonable efforts to protect and secure sensitive information. Sensitive data are any information of which the loss, misuse, unauthorized access to, or modification of could adversely affect the Home Energy Plus (HE+) Program, contracted agencies, program employees, and/or customers. Sensitive data and information include, but are not limited to, Social Security numbers (SSNs) and Personally Identifiable Information (PII) meaning information that can directly identify a specific individual, household member, or account-specific information.

For the purposes of the following policy, sensitive data has two tiers.

Tier One sensitive data includes:

- SSNs by themselves or in combination with any PII (including date of birth, names, address, phone number, fuel account number and name, and income information),
- The combination of date of birth and name without an SSN,
- WHEAP-related single party checks returned to the local agency

#### Tier Two sensitive data includes:

PII elements that may be needed to complete effective business communications in support of the HE+ Programs (name, address, phone number, fuel account information, and income information).

Agencies shall limit the use and exchange of sensitive data to the minimum required to conduct HE+ Program business effectively.

When using sensitive data individually or in quantity, contracted HE+ Program agencies, contractors, and participants shall take reasonable actions to ensure the protection of sensitive program data that are collected, displayed, transferred, stored, analyzed, or destroyed. This appendix identifies minimum requirements that shall be used for equipment, information collected, and methods of transferring sensitive information. Contracted agencies shall have documentation and planned procedures in place for the handling of sensitive data and be able to make them available upon request.

#### **Non-Disclosure Agreement**

A contracted agency shall not disclose sensitive data to any persons other than those directors, officers, employees, and agents who have a business-related need to have access to such information for the limited purposes of the contract and who have been apprised of, and agree to maintain, the confidential nature of such information in accordance with the terms of the contract.

All staff that have HE+ System access will be prompted to agree to the Conflict of Interest/Non-Disclosure Agreement Form upon gaining access to the HE+ System. For staff that work with WHEAP, but do not have HE+ System access, agencies shall require staff members to sign a Conflict of Interest/Non-Disclosure Agreement. A copy of a Conflict of Interest/Non-Disclosure Form which may be requested from the Division. This agreement is valid for the duration of employment with the agency. The contracted agency is responsible for the breach of the contract



by any agency staff.

# **Desktops**

Desktops that are used for collecting, displaying, transferring, analyzing, or storing Tier One or Tier Two sensitive data shall apply the following standards:

- 1. Desktops shall be locked when left unattended by authorized personnel. Re-entry into the desktop shall require a user login and password.
- 2. An automated screen saver lock shall be enabled after 15 minutes of inactivity. Re-entry into the desktop will require a user login and password.
- 3. Hard drives shall be cleansed using at least a seven pass overwrite procedure (commonly referred to as the Department of Defense (DOD) standard), where the drive is written over electronically to eliminate all data prior to surplus or re-assignment to another user or work area. Contracted agencies shall make available upon request verification that the device has been sanitized meeting industry standards, seven pass overwrite, degaussing (sanitation based on magnetism), or complete physical destruction of the hard drive media.

# **Portable Computing Devices**

Portable computing devices that are used for collecting, displaying, transferring, analyzing, or storing Tier One or Tier Two sensitive data shall apply the following standards:

- 1. Personally assigned portable computing devices shall have full disk (hard drive) encryption, requiring a login and password.
- 2. Portable computing devices shall have the boot-up from external or secondary devices disabled. Boot-up shall only be permitted from the hard drive.
- 3. An automated screensaver lock shall be enabled after 15 minutes of inactivity. Re-entry into the laptop will require a user login and password.
- 4. Portable computing devices that are inactive for 15 minutes shall automatically lock.
- 5. Do not store Tier One sensitive data on shared pool portable computing devices.
- 6. Hard drives shall be cleansed using at least a seven pass overwrite procedure (commonly referred to as the Department of Defense (DOD) standard), where the drive is written over electronically to eliminate all data prior to surplus or re-assignment to another user or work area. Contracted agencies shall make available upon request verification that the device has been sanitized meeting industry standards, seven pass overwrite, degaussing (sanitation based on magnetism), or complete physical destruction of the hard drive media.

#### **Portable Media**

Portable devices used for collecting, displaying, transferring, analyzing, or storing Tier One or Tier Two sensitive data shall apply the following standards:

- 1. Files that contain Tier One sensitive data shall require a password to open.
- 2. Media that may contain sensitive information shall be encrypted and require a login and password to access the media prior to file or folder access.



- 3. Shall be stored in a restricted access location, surrounded by a durable physical barrier that is not portable.
- 4. Disposal of the media shall require wiping electronic media with at least a seven pass overwrite of the entire medium, degaussing (sanitation based on magnetism), or complete physical destruction of the medium.

# **General Electronic File Creation and Storage**

Tier One sensitive data shall not be used to name files or folders. Faxing or transmitting original or copies of SSN cards, driver's licenses, identification cards, or any Tier One data is prohibited.

#### **Shared Network Drive**

Files containing Tier One and Tier Two sensitive data stored on a network drive shall be stored in a secured folder limited to staff that require access to the data.

#### File Transfer Protocol (FTP) Sites

Tier One and Tier Two Sensitive data on FTP sites shall require the following standards:

- 1. Files require a password to open.
- 2. The password shall not be stored in the file name, file properties, or other related information files about the file (a.k.a. metadata).
- 3. Password is to be provided to the end user via phone, email, or other separate method of communication.
- 4. Sensitive data shall not be stored on an FTP site as a long term or permanent solution.

#### **Email**

Agencies shall not email Tier One sensitive data. Agencies may, at their discretion, permit applicants to submit HE+ applications by email. Agencies allowing email applications shall first encourage application via phone, online, in person, or mail as an alternative to email. Agencies shall be clearly advised that they should not include Social Security numbers on emailed applications, advising the applicant that they will be contacted by the agency for this information. Upon receipt of application materials from applicants or household members by email, the application shall be entered using the date sent as the date of application. The application shall remain "Pending" until all information has been verified. Customer signatures received on a Certification Page received by email, even if name is typed in the signature field, are valid signatures. All other applicable WHEAP eligibility policy requirements remain in effect.

### Instant Messaging (Texting, Social Media, Direct Messages, etc)

Agencies shall not send Tier One sensitive data externally via instant messaging platforms. Agencies may, at their discretion, conduct outreach to customers via instant messaging or various social media networks. Agencies shall not include Social Security numbers in any external correspondence.

#### **Hard Copies**

#### Storing hard copies:

Tier One sensitive data that are printed or physically displayed on media shall:



- 1. Be stored in a locked access location (key code door, key fob, combination lock, etc.).
- 2. Meet programmatic requirements for record retention requirements. See specific program policies for requirements.
- 3. Be disposed of through complete destruction of the material, including shredding the media or burning the materials.

Tier Two sensitive data that are printed or physically displayed on media shall:

- 1. Be stored in a restricted access location.
- 2. Meet programmatic requirements for record retention requirements. See specific program policies for requirements.
- 3. Be disposed of through complete destruction of the material, including shredding the media or burning the materials.

#### Hard copies in transit:

When transporting hard copies of Tier One and Tier Two sensitive data, the data shall be stored in a location secured by a durable physical barrier requiring a code or key, such as a locking metal file case or lock box. A log shall be maintained of all files being transported from the point of origin to the point of receipt. The log shall not be transported in the same location as the hard copies of sensitive data.

# **Quality Assurance**

Contracted agencies shall have procedures established to ensure:

- 1. Employees are made aware of the policy requirements annually. The agency is responsible for ensuring signers of Conflict of Interest/Non-Disclosure Forms have a full and complete understanding of the Home Energy Plus Policies for Handling Sensitive Data.
- 2. Technology and devices are within the standards set forth by the Policies for Handling Sensitive Data.
- 3. When scanning (making an electronic copy of) documents for storage, the original hard copy or source data are to be maintained until the scanned document imagery is secured. Original hard copies and source data are to be handled and destroyed in accordance with applicable document retention guidelines. Original hard copies are not required to be retained once scanned into the HE+ System.
- 4. Documentation is written and maintained for plan of action regarding incident management and data handling. Employees are to immediately notify their supervisor if it is suspected that sensitive data may have been compromised in any way (i.e., loss, theft, unattended media including, but not limited to, personal electronic device(s), desktop computers, and laptops). Incident information to be recorded and retained:
  - a. Date and time of incident
  - b. Location of incident
  - c. Description of what happened to expose the data
  - d. List of potential impacted identities shall be made available upon request in a password-secured document
  - e. Plan of prevention and correction



- f. Incident information will be password protected in a secured folder on the network drive and restricted to the necessary authorized individuals
- g. The Division of Energy, Housing and Community Resources shall be notified of any incidents and corrective actions
- 5. Contracted agencies shall not:
  - a. Scan, photocopy, or retain photo identification of program applicants or household members.
  - b. Scan, photocopy, or retain Social Security cards of program applicants or household members.
  - c. Send or request materials to be sent containing Social Security numbers by public or private mail, text, social media, or instant messaging service.

#### **Definitions**

**contracted agency** – An agency that has entered an agreement for program delivery on behalf of the HE+ Program or Wisconsin Department of Administration, Division of Energy, Housing and Community Resources.

**degaussing** – A method of eliminating data on a storage device, where the drive is subjected to sufficient levels of magnetism to result in destruction of all data on the drive.

**desktops** – A computer that is intended as a non-portable workstation.

**email** – An electronic system which is used to exchange messages between individuals through the internet.

File Transfer Protocol (FTP) site – An internet site intended to transfer files or folders.

**instant messaging** – A type of online chat that offers real-time text transmission over the internet.

**hard copies** – A hard copy is any information printed, written, or displayed on a surface such as paper.

**overwrite procedure** – A method of eliminating data on a storage device, where the drive is repeatedly written over electronically to eliminate all data.

**metadata** – Any related information about the file or data.

**Personally Identifiable Information (PII)** – Any information by itself or combined with additional information that can be used to directly identify a specific individual.

**portable computing devices** – Any device that is designed as a portable workstation for an individual.

**portable media** – A drive, disk, or storage device that can be removed from one electronic device and used on another electronic device.



**scanning** – Making an electronic copy of a physical document.

**sensitive data** – Any information of which the loss, misuse, unauthorized access to, or modification of could adversely affect the HE+ Program, contracted agencies, program employees, and/or customers.

**shared network drives** – Drives that are accessible to individuals through a server for the purposes of sharing electronic files and folders.

**Social Security number (SSN)** – A nine-digit number issued to an individual by the Social Security Administration.

**text message** – An electronic communication sent and received by a mobile phone.

#### Tier One sensitive data includes:

- SSNs by themselves or in combination with any PII (including date of birth, names, address, phone number, fuel account number and name, and income information)
- The combination of date of birth and name without an SSN
- WHEAP-related single party checks returned to the local agency

#### Tier Two sensitive data includes:

PII elements that may be needed to complete effective business communications in support of the HE+ Programs (name, address, phone number, email address, fuel account information, and income information).



# **Appendix B | WHEAP Application Income Types**

Refer to WHEAP policy for specific information on counted and ignored income; this is a quick reference guide only. Refer to Section <u>3.4.27</u> for more guidance on income entry.

The items in the "Most Common Verifications" column are not listed in any specific order of preference.

Income Type	HE+ System Code	Income Entry Reminders	Source	Most Common Verifications
Alimony Received	Alimony Received  (A)  May be spousal support, however, this is not the same as spousal impoverishment.			KIDS, check stubs, and bank statement
Child Support Received	(CS RECD)	Associate with the parent who receives the CS. It does not have to be entered under each child's name. Enter a separate CS RECD for each source to verify each child support case.		KIDS, state-issued debit card statement, bank statement, Wisconsin Way2Go Debit MasterCard statement, check stubs, or CS printout (the individual may be charged a fee to obtain the printout)
Child Support Paid  (CS PAID)  (CS PAID)			KIDS, payroll check stubs, or CS printout (the individual may be charged a fee to obtain the printout)	
C-Supp - SSI Caretaker Supplement <sup>1</sup>	(CTS;C- SUPP)	Associate the state CTS benefit for each eligible child in the household. CTS eligible household members are categorically eligible.		Notification of decision, CARES, Forward Health, or bank statement (Reminder: CTS payments may be included in the State SSI Income amount)
Disability Long- term	(DL)	May see this income in the next year. Count the gross income.	Employer or insurance company	Benefit check stubs or employer/insurance company statement



Income Type	HE+ System Code	Income Entry Reminders	Source	Most Common Verifications
Disability Short- term	(DS)	Benefit is usually a short duration but may turn into a long-term disability payment. Count the gross income.	Employer or insurance company	Benefit check stubs or employer/insurance company statement
Dividends/Interest <sup>2</sup>	(D)	Complete one income entry for combined interest/dividends income.	Name of stock/bank/ bond	Tax Form 1040, 1099, or statements covering a 12-month time period
Gambling/ Lottery/Bingo	(G)	Count gross winnings received in the test period. Tribal Per Capita money should be entered as Tribal Per Capita Income.		Tax Form W-2G or winnings statements
General Relief	(GR)	Economic support benefit awarded by a county or tribe.		CARES or check stubs
Gift/Donations	(GF)	Count money received as a gift or donation in the prior month. Do not include gifts received for birthdays, holidays, or other special occasions.	Identify the source/ relationship of donor	Zero-income households may self-declare gift income on the Zero Income Form (ZIF). Households with other income may self-declare using the gift income section of the ZIF or with a written statement. An HE+ System Note is required when the customer self-declares gift income. A written or verbal statement from the gift giver is also acceptable.
Government Relief or Disaster	(GV)	Issued by the federal or state government for aid to the household. (Examples: refugee aid, flood relief, etc.)		GA list, Tax Form 1040, 1099, or check stub
Land Contract Payment	(I (:)   Interest portion of			Land contract - amortization schedule or Tax Form 1040 with Schedule B



Income Type	HE+ System Code	Income Entry Reminders	Source	Most Common Verifications
Other	(O)	Use "Other" only for income types that are not identified by WHEAP. Check the Ignored Income Table in Chapter 2 of policy to make sure it is not ignored income. Trust funds are a type of annuity (P).	Must identify the type of income. (Examples: stipends, stumpage, crop payments)	Tax Form 1040, notification letter, or 1099-MISC
Pensions, Annuities, and IRAs <sup>3</sup>	(P)	Enter a separate income for each source of annuity and IRA. NOTE: Veterans Pension, Disability, and Military Retirement income should be recorded as Veterans Income. Trust fund income should be recorded as an Annuity.	Employer or financial institution. (Example: railroad retirement)	Tax Form 1040, 1099, check stubs, bank statements, or gross dollar amounts from statements covering a 12-month time period <sup>3</sup> .Trust fund income will be reported on K-1 and Schedule E Part III. Monthly verification is acceptable.
Rental Income <sup>2</sup>	(R)	Includes dwelling, land, or other rental income.	Type of rental: apartment, duplex, single family home, land, etc.	Tax Form 1040 and all supporting schedules or Self-Generated Income Report Form (S-GIRF) showing 12 months of income.
Self-Generated Income (Self- Employment) <sup>2</sup>	(SE)	Record all forms of SE, including losses. Enter a separate SE for each source. Includes: odd jobs, babysitting, hair stylist, etc. NOTE: SE losses can be offset against SE profits, including rental income. See WHEAP policy, Chapter 2.	Must identify type of SE	Tax Form 1040 and all supporting schedules or Self-Generated Income Report Form showing 12 months of income. NOTE: Agency must upload to the HE+ System copies of any documents used to verify self-generated income.



Income Type	HE+ System Code	Income Entry Reminders	Source	Most Common Verifications
		benefits paid to retired workers, their dependents, and/or survivors of		Award letter, CARES, bank statements, Tax Form 1099, My Social Security (http://www.ssa.gov/myaccount)
Social Security Disability (SSDI) Insurance		Count all SS benefits paid to disabled workers and/or their dependents.		Award letter, CARES, bank statements, Tax Form 1099, My Social Security (http://www.ssa.gov/myaccount)
Spousal Impoverishment	(SP)	A spouse located in a nursing home elects their community spouse to receive some or all of his/her income. The community spouse's income includes the full amount allocated by the institutionalized spouse.		A written or verbal statement from Medicaid eligibility worker.  NOTE: Amount of income allocated to community spouse is shown on the CARES Worker Web (CWW) budget screen.
Supplemental Security Income <sup>1</sup>	(SSI)	Enter state and federal benefits separately. Federal portion is usually an even amount and the state portion will usually include cents. NOTE: State payments may include CTS income, which is a separate income entry.	Identify federal or state payment	Award letter, bank statement, CARES, Forward Health
TANF/W-2  (T)  Count all W-2 income received (net). NOTE: TANF or W-2 eligible household members may be categorically			CARES, printout, award/sanction letter, check stubs	



Income Type	HE+ System Code	Income Entry Reminders	Source	Most Common Verifications
Tribal Per Capita <sup>2</sup>	rribal Per Capita²  (TR)  eligible.  Count all Tribal Per Capita income in the last 12 months or use the 1099 from the prior year.  Subtract \$2,000 from the gross then divide by 12 to get a monthly amount. If total gross amount is less than \$2,000, treat the entire amount as ignored income.			Check stubs, tribal verification, 1099
Unemployment Compensation	(UC)	If household member has seasonal worker income, use annualized income. NOTE: If applicant receives UC each year, determine if this is seasonal employment.  UC is ignored income, but still must be entered in the application. The HE+ System will not include it in the total income.		UC statement, check stubs, DIHLR wage record, CARES, Tax Form 1099 - only if income is annualized. Bank statements are not an acceptable verification item. <sup>4</sup>
Veterans Benefits	(V)	Be sure to determine if the income is Veteran's pension, Veteran's compensation, or military retirement benefits (pension).	Identify type of Veteran's benefit	For VA pension or VA compensation: bank statement, annual award statement, or VA/VSO phone verification. For Military Pension: myPay Electronic Records
Wages & Tips	Count gross wages and tips. Do not count wages for minors under the age of 18 (see Ignored Income Table in WHEAP		Identify the employer	Check stubs, employer payroll statement, recent tax return, Wage Attestation Form, or bank statement. <sup>4</sup> NOTE: Seasonal worker wages should be annualized from a W-2. <sup>5</sup>



Income Type	HE+ System Code	Income Entry Reminders	Source	Most Common Verifications
		policy for Earned Income). NOTE: Bonuses, tips, and vacation pay are wage income.		
Workers Compensation	(WK)	Count the gross workers compensation income.	Employer or insurance company	Benefit check stubs or employer/insurance company statement

<sup>&</sup>lt;sup>1</sup> Income makes household member categorically eligible.

<sup>&</sup>lt;sup>2</sup> Use a 12-month income test period.

<sup>&</sup>lt;sup>3</sup> Use a one-month test period if paid monthly; 12-month test period if paid quarterly/annually.

<sup>&</sup>lt;sup>4</sup> Check stubs are the preferred and most accurate representation of gross wage income. The Wage Attestation Form or a bank statement may be used if a customer is unable to provide a check stub or tax return. If either the Wage Attestation Form or bank statement is used, the worker must enter an HE+ System Note explaining why the customer could not provide a check stub or recent tax return.

<sup>&</sup>lt;sup>5</sup> If a customer is a seasonal worker, use the same 12-month test period for wages and UC.



# **Appendix C | Rental Assistance Forms**

Form HUD-50058, Family Report, applies to Public Housing, Housing Choice Voucher, and Section 8 Moderate Rehabilitation programs.

This is the coversheet of the 28-page Family Report application. The applicant shall provide a copy of the summary document received from their housing agency to verify their rental assistance and utility allowance.

OMB Approval Number 2577-0083 (expires 05/31/2020)

# U.S. Department of Housing and Urban Development

Office of Public and Indian Housing

# Family Report

Form HUD-50058, Family Report, applies to Public Housing, Housing Choice Voucher, and Section 8 Moderate Rehabilitation programs.

Additional instructions are contained in the Form HUD-50058 Instruction Booklet. Copies of the Instruction Booklet can be found on the PIC Web Site at <a href="http://www.hud.gov/offices/pih/systems/pic/50058/pubs/">http://www.hud.gov/offices/pih/systems/pic/50058/pubs/</a>

Previous editions are obsolete

form HUD-50058 (11/2013)



For Personal Records ONLY - not for

Printed By: HDS version 16.0.0.15

# Form HUD-50059 applies to Section 8 housing program.

# This sample Form 50059 shows a utility allowance of \$49:

Owner's Certification of Compliance U. S. Department of Housing Submission to the Federal Government with HUD's Tenant Eligibility And Urban Development and Rent Procedures Office of Housing Federal Housing Commissioner (Exp. xx/xx/xxxx) Section B. Summary Information 04/01/2017 40-201 12. Effective Date 21, Unit Number 1. Project Name 13. Anticipated Voucher Date 04/01/2017 22, No. of Bedrooms 2. Subsidy Type 1 (Section 8) 23. Building ID 14. Next Recertification Date 04/01/2018 3. Secondary Subsidy Type 24. Unit Transfer Code 15. Project Move-In Date 4. Property ID 25. Previous Unit No. 5. Project Number 259 26. Security Deposit 16. Certification Type 6. Contract Number 27. 236 Basic/BMIR Rent 17. Action Processed 7. Project iMAX ID 28. Market Rent 0 8. Plan of Action Code 18. Correction Type 433 29. Contract Rent 30. Utility Allov 31. Gross Rent 9. HUD-Owned Project? 19 FIV Indicator 482 10. Previous Housing Code 20. Prev. Subsidy Type 0 11. Displacement Status Code 32. TTP at RAD Conversion Section C. Household Information 38 Alien Reg. ID Code SSN Ctzn Work Birth Stdnt Age Special Last Name First Name MI Rel Race Eth Date Status Stat. (SSN) Excp Code Number Codes 03 04 05 06 07 08 53. Number of Family Members 54. Number of Non-Family Members 57, Expected Family Addition-Adoption 50. Family has Mobility Disability? 58. Expected Family Addition-Pregnancy 51. Family has Hearing Disability? 55. Number of Dependents 52. Family has Visual Disability? 59. Expected Family Addition-Foster Children 0 Number of Eligible Member Previous Effective Date 60. Previous Head Last Name 61. Previous Head First Name 62. Previous Head Middle Initial 64. Previous Head ID Previous Head Birth Date Section E. Asset Information Section D. Income Information 75. 80. 66. 77. 78. 76. 68 SSN Benefits Mbr Actual Yearly Date Mbr Cash Value Description Status Income Type Code Amount Income Divested No Claim No. No. Checking C 122 1 1 ST 2,136 SS 1,005 1 81. Total Cash Value of Assets 82. Actual Income from Assets 83. HUD Passbook Rate 122 Total Employment Income 10,065 71. Total Pension Income 0.00 Total Public Assistance Income
 Total Other Income 84. Imputed Income From Assets 74. Total Non-Asset Income 10,065 85. Asset Income Section F. Allowances & Rent Calculations 242 10,065 Deductions for Dependents 108. Total Tenant Payment 86. Total Annual Income 0 193 87. Low Income Limit 88. Very Low Income Limit 109. TTP Before Override 46,000 98 Child Care Expense(Work) 29,400 17,650 99. Child Care Expense(School) 100. 3% of Income 110. Tenant Rent 111. Utility Reimbursement 302 89. Extremely Low Income Limit 240 90. Current Income Status 91. Eligibility Universe Code 92. Sec. 8 Assist. 1984 Indicator 101. Disability Expense 102. Disability Deduction 103. Medical Expense 112. Assistance Payment 113. Welfare Rent 114. Rent Override 93. Income Exception Code 94. Police / Security Tenant? 115. Hardship Exemption 104 Medical Deduction 105. Elderly Family Deduction 106. Total Deductions 107. Adjusted Annual Income 116. Waiver Type Code 117. Eligibility Check Not Required 400 95. Survivor of Qualifier? 96. Household Citizenship Eligibility 9.665 118. Extenuating Circumstances Code form HUD-50059 (6/2014) Page 2 of 2 Previous versions of this form are obsolete HB 4350.3 Rev 1 This form also replaces HUD-50059-D, -E, -F, & -G



# This sample Form 50059 shows no utility allowance:

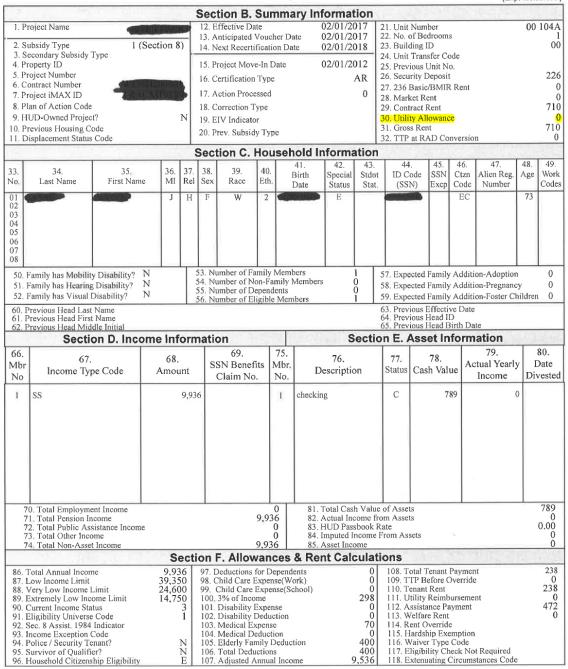
Owner's Certification of Compliance U.S. Department of Housing with HUD's Tenant Eligibility and Rent Procedures

# And Urban Development

For Personal Records ONLY - not for Submission to the Federal Government

Office of Housing Federal Housing Commissioner

Record for Landlords (Exp. xx/xx/xxxx)



Previous versions of this form are obsolete

This form also replaces HUD-50059-D, -E, -F, & -G

Page 2 of 2

form HUD-50059 (6/2014) HB 4350.3 Rev 1

Printed By: HDS version 16.0.0.15



# Appendix D | Program Year (PY) 2023 Wisconsin Home Energy Assistance Program (WHEAP) Manual Summary of Changes

The table below is a quick reference guide of key changes made to the PY 2023 WHEAP Manual. The list is not all inclusive of every change, nor is it a direct policy reference. All policies listed below shall be reviewed in entirety in the full PY 2023 WHEAP Manual. Changes in the manual that are effective as of October 1, 2022 are highlighted in yellow. Changes in the manual that are effective November 9, 2022 are highlighted in blue.

Manual	Reference	Summary of Change
1.6	WHEAP – Application Process	<ul> <li>Added that the worker stating their name and the date must be included on telephonic signatures.</li> <li>Revised COVID-related exceptions that may be granted for obtaining a customer signature to exceptions for illness or other extenuating circumstances.</li> <li>Added information that the HE+ System records the date and time a customer "signs" and submits an online application.</li> </ul>
2.1	General Eligibility Rules and Guidelines	Added information that a customer denied for Regular Benefits because their application was submitted after the end of the heating season may still be able to receive Prevention Assistance, HE+ Program Services, and/or Weatherization services.
2.2.2.1	Type of Residence	<ul> <li>Added that if an applicant resides in a motel, hotel, or RV/camper, the worker must contact the HE+ Help Desk to determine if the dwelling is eligible.</li> <li>Removed the housing type of "Rooming house, motel, hotel, YMCA, or YWCA" from the list of eligible dwellings.</li> </ul>
2.2.2.2	Roomers	Clarified that an applicant with a housing arrangement in which they rent a sleeping room and share common living spaces with other residents shares an energy burden and are part of an economic unit with the other residents.
2.2.5.2	Energy Burden Table	<ul> <li>Corrected references to the proxy amount, as it is an actual value and not zero ("0").</li> <li>Added that an applicant renting a single room in a dwelling and sharing common living areas such as a kitchen, living room, or bathroom with other residents does not have their own energy burden and must apply with the other residents of the housing unit to be eligible for WHEAP.</li> </ul>
2.2.6.4	Household Members Not Included on Application	Removed roomer/boarder from the list of persons who are not included as household members.
2.3.2	Counting Income	A prior month test period that contains an extra paycheck or overtime hours that are not available in the current month does not constitute a change in the household's financial circumstances. If a household is over-income due to an extra paycheck or overtime pay received in the prior month test period and there has not been a change in the household's financial circumstances, annualizing the household's income from the previous tax year should be considered.



Manual	Reference	Summary of Change
		Clarified policy on counting income from annual IRA withdrawals for customers under age 70.
2.3.5.1	Verification of Income - Self- Generated Income	Removed that when COVID has affected a customer's self- employment income, the One- Month or 12-month Self- Generated Income Report Form (S-GIRF) may be completed showing gross income.
2.3.5.3	Self-Generated Income and Annual Fuel Usage	Corrected reference to the proxy amount, as it is an actual value and not zero ("0").
2.3.5.4	Document Upload	Added that any documentation an applicant submits must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason.
2.3.7	Income Counted Table	Revised unemployment compensation (UC) information on the table as UC is entered on the HE+ Application but the HE+ System does not count it as part of the household's total income.
2.3.8	Income Deducted Table	Clarified that Medicare Part B premiums are deducted when entering Social Security retirement income, but Part D premiums are not.
3.2.2	Home Energy Plus Application (Long Form)	<ul> <li>Added that if an applicant submits a paper application form or any other documentation, that form must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason.</li> <li>Removed that the HE+ Application is updated each Federal Fiscal Year (FFY); it is updated periodically as needed and is no longer tied to a specific FFY.</li> </ul>
3.2.3	Home Energy Plus Short Application Form	Added that if an applicant submits an HE+ Short     Application Form or any other documentation, that form     must be uploaded to the application in the HE+ System     even if the application is incomplete or will deny for another     reason.
3.2.4	Automated Applications	<ul> <li>Added that any documentation the customer provides must be uploaded to the application in the HE+ System even if the application is incomplete or will deny for another reason.</li> <li>Added that eligible households may have automated applications for two consecutive years.</li> </ul>
3.3.4	Online Application Processing	<ul> <li>Added that an online application can only be validated if the applicant provides a correct SSN for all household members.</li> <li>Clarified that workers shall upload the Incomplete Notification/Notice into the HE+ System if an alternative form to the HE+ System-generated notice is used.</li> </ul>
3.3.5	Updating Applications Created by Other Agencies	Added policy for new HE+ System functionality that allows an agency to update or, if an emergency situation exists, to transfer and submit an application created by another agency serving the same territory.



Manual F	Reference	Summary of Change
		<ul> <li>Added that an agency shall not delete or cancel an application created by another agency without approval from the HE+ Help Desk.</li> </ul>
3.4.13	Field #7 Housing Type	<ul> <li>Added the new "Motel or Camper/RV" housing type and removed the "Rooming house, motel, hotel, and YMCA or YWCA" housing type.</li> <li>Added HE+ System Note requirement for "Motel or Camper/RV" housing type.</li> </ul>
3.4.14	Field #8 Mailing Address	Added that if the mailing address differs from the residence address and is not a PO Box, an HE+ System Note is required to explain why the two addresses are different.
3.4.17	Field #11 Room Count	Added that if "Motel or Camper/RV" housing type is selected, the number of rooms must equal one.
3.4.24	Field #18 Is Present Month Income	<ul> <li>Corrected policy to no longer state that the HE+ System default for the Present Month Income field is "No".</li> </ul>
3.4.26.3 and 3.4.26.4	Household Members: Ethnicity Type and Race	Added policy for the new requirement to record ethnicity and race data for each household member.
3.4.27.2	Self-Certification for Zero Income Households	<ul> <li>Clarified that self-certification is accomplished by completing a Zero Income Form (ZIF).</li> <li>Clarified that if third-party verification of ignored income is obtained, that verification is sufficient for the ZIF document upload requirement.</li> </ul>
3.4.27.3	Use of the Zero Income Form	Added that the Zero Income Form may be used as written self-verification of any gift income the customer received during the test period. A written or verbal statement from the gift giver may also be used as verification, but it is no longer required.
3.4.28.10	Shared Meter	<ul> <li>Clarified that shared meter also applies to an outbuilding on the property that has more than a negligible impact on the household's energy usage.</li> <li>Added that residential rental property is not considered a business for business use purposes; select "Yes" for shared meter if a landlord shares a meter with their tenant.</li> <li>Removed that both business use and shared meter use should not be entered for one fuel type; this is allowable if a housing unit has both a shared meter and business use on the meter.</li> </ul>
3.4.28.11	Business Use on the Account	Clarified that one question workers should ask when determining if they should select "Yes" for business use on the account is, does business activity likely have an impact on the home energy use?
4.2.1	Emergency Crisis and Prevention Assistance Eligibility – General Eligibility Guidelines	<ul> <li>Added that if the household composition has changed since the HE+ Application was completed, a new HE+ Application shall be created in order for the household to apply for Crisis Assistance.</li> <li>Clarified policy regarding eligibility for Crisis Assistance if the HE+ Application denies as over-income.</li> </ul>



Manual	Reference	Summary of Change
4.2.1.1	Denial of Emergency Crisis or Prevention Benefits or Services	<ul> <li>Added an HE+ System Note requirement if a customer is denied Prevention Assistance.</li> <li>Reduced the combined total that a customer may receive in Emergency Crisis and Prevention Assistance for the program year from \$3,000 to \$1,200.</li> </ul>
4.2.1.2	Emergency Crisis and Prevention Assistance Amount	Reduced the preapproved range for a Crisis Assistance benefit to \$30 to \$600 for LIHEAP Emergency Crisis and \$30 to \$350 for Public Benefit Crisis from the higher ranges allowed in PY 2021 and PY 2022.
4.2.2	Emergency Crisis Eligibility – Additional Guidelines	<ul> <li>Changed the requirement to qualify for Emergency Crisis         Assistance from "a household must have no heat or will         have no heat by the end of the next working day" to "a         household must have no heat or be facing the imminent         loss of essential home energy."</li> <li>Added a requirement that a customer must have paid at         least \$25 on their associated energy bill in the past three         months to receive Emergency Crisis Assistance.</li> </ul>
4.2.3	Prevention Assistance Eligibility – Additional Guidelines	Reinstated the requirement that was waived by COVID-19 policy changes that a customer must have paid at least \$25 on their associated energy bill in the past three months to receive Prevention Assistance.
4.3.1	Emergency Crisis Assistance: General WHEAP Agency Responsibilities	Added that before providing an Emergency Crisis or benefit for a deliverable fuel customer, the WHEAP agency must contact both the customer and the vendor to confirm that the customer has not moved, is not deceased, and has an active account with the vendor.
4.3.2	Emergency Crisis Assistance	<ul> <li>Clarified that if a customer is eligible for LIHEAP, but not eligible for PB benefits because their electric vendor does not participate in the PB program, the customer may receive LIHEAP Crisis Assistance for their non-heating electric service.</li> <li>Added information about the Water Conservation Program.</li> </ul>
4.6	Crisis Codes Quick Reference	Added Water Conservation codes.
4.6.4	Program Services Codes (Formerly the WHEAP Furnace Repair and Replacement Payment Codes)	Added Water Conservation and associated codes to this section.
5.2	Administrative Review Agency Responsibilities	<ul> <li>Added that associated application corrections that result in a cancel/refund require Division staff to be contacted for additional guidelines <b>prior</b> to conducting the actions in the HE+ System.</li> </ul>
5.3	Desktop Monitoring Agency Responsibilities	<ul> <li>Changed the titles of key program areas for desktop monitoring reviews from Contract Compliance and Contract Allocations to Program Operations and Program Integrity.</li> <li>Added three required actions for agencies:         <ul> <li>Submit the pre-visit questionnaire by the deadline established by Division staff</li> <li>Submit documents requested by the Division by the deadline established by Division staff</li> <li>Attend scheduled Training and Technical Assistance Sessions led by Division staff</li> </ul> </li> </ul>



Manual F	Reference	Summary of Change
		<ul> <li>Added that associated application corrections that result in a cancel/refund require Division staff to be contacted for additional guidelines <b>prior</b> to conducting the actions in the HE+ System.</li> </ul>
6.3.1	Cancel Benefit (Cancel and Refund)	<ul> <li>Added that when cancelling a benefit on an application where Fuel Usage Type is "BOTH", both the HEAT and PB benefit must be cancelled even if only one of the benefits is affected by more than \$30.</li> </ul>
6.4.2	Automated Applications: Change in Household Composition or Income	Added that when a worker is correcting an automated application due to a change in household composition or income, they must not change the "Outreach Type" or "Is Interactive Fields".
7.8	Lost, Stolen or Destroyed Benefit Checks	<ul> <li>Changed requirement that customers must pick up replacement checks from the agency; the Division will mail replacement checks to customers after the agency confirms the customer's mailing address and adds an HE+ System Note that they have confirmed the customer's mailing address.</li> <li>Removed requirement for applicants to return a mutilated or destroyed check to the Division.</li> <li>Added that for an applicant's second request for a replacement check for the same benefit, the applicant must pick the check up at a local agency after presenting a photo ID.</li> <li>Added instructions for agencies processing a WHEAP Affidavit of Lost, Stolen or Destroyed Benefits Form for a customer whose application was processed by another agency.</li> <li>Added instructions for agency actions when a check has been cashed but the applicant insists they did not cash the</li> </ul>
9.4	Reimbursement Payments	Updated information about the frequency in which the Department conducts invoice reimbursement payments from twice monthly to daily.
10	Definition of Terms	<ul> <li>Revised the definition of "roomer" to clarify that a roomer rents an individual sleeping room and shares common living spaces and an energy burden with other residents.</li> <li>Revised the definition of "rooming house" to be a living arrangement rather than a type of housing.</li> </ul>
Appendix B	WHEAP Application Income Types	<ul> <li>Added the Wisconsin Way2Go Debit Mastercard statement as an allowable document to verify Child Support Received income.</li> <li>Clarified that the Zero Income Form (ZIF) can be used by all households to self-declare gift income, not only zero-income households.</li> <li>Added Forward Health as an allowable source to verify Supplemental Security Income.</li> <li>Added that Unemployment Compensation is ignored income but must be entered into the application and the HE+ System will not include it in total income.</li> </ul>



Manual R	Manual Reference		Summary of Change	
Appendix H	Required HE+ System Notes	•	Added note requirements related to updating or completing an application created by another agency.  Added that if an applicant's mailing address differs from their residence address and it is not a PO Box, an HE+ System Note with an explanation is required.  Added a requirement to fully explain the reason(s) if a customer requests and is denied Prevention Assistance.  Added a requirement to document the customer's mailing address when the customer completes an affidavit for a lost, stolen, or destroyed benefit check.  Added a requirement to fully document the situation when an applicant resides in a motel or camper/RV and the agency is requesting HE+ Help Desk approval.	
Appendix J	COVID-19 Policy Changes for Program Year 2022	•	This appendix was removed.	



# Appendix E | FFY 2023 (2022-2023) Wisconsin 60% State Median Income Guidelines

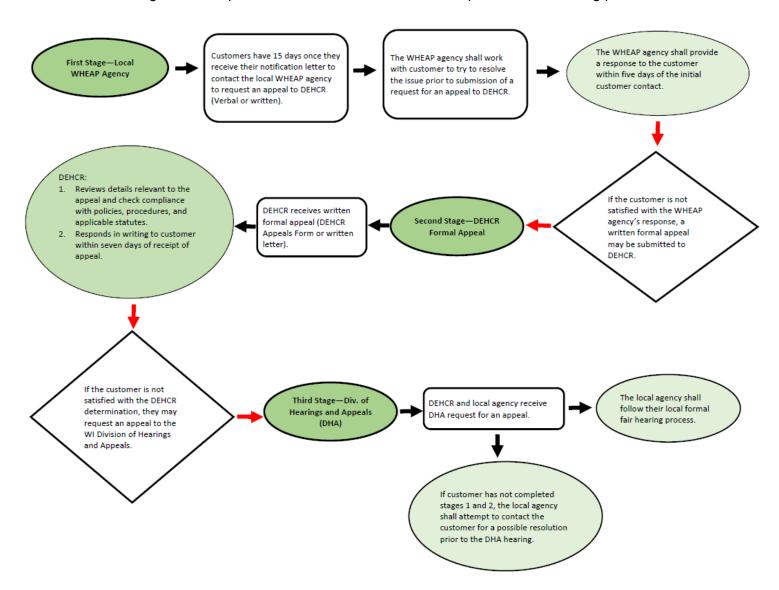
The Home Energy Plus (HE+) Program uses a prior month income test which is annualized to determine program income eligibility.

Household Size	One-Month Income	Annual Income	
1	\$2,675.25	\$32,103	
2	\$3,498.42	\$41,981	
3	\$4,321.58	\$51,859	
4	\$5,144.83	\$61,738	
5	\$5,968.00	\$71,616	
6	\$6,791.17	\$81,494	
7	\$6,9,45.50	\$83,346	
8	\$7,099.83	\$85,198	



# Appendix F | Fair Hearing Flow Chart\*

The following flow chart provides an overview of the three steps in the fair hearing process.



<sup>\*</sup>A copy of the Flow Chart can be found on the Home Energy Plus Training & Technical Assistance website.



# Appendix G | Automated Application Customer Letter Template

County Name CO DHHS WISCONSIN HOME ENERGY ASSISTANCE PROGRAM 123 Main Street Townsburg, WI 55555-5555

(555) 555-0000

WISCONSIN Division of Energy Housing and Community Resources http://homeenergyplus.wi.gov

CUSTOMER SMITH 234 ELM ST TOWNSBURG, WI 55555-5555

Friday, August 14, 2020

Applicant ID: 00000000

Dear CUSTOMER SMITH.

This letter is to inform you that the Wisconsin Home Energy Assistance Program will automatically process your energy assistance application. It will not be necessary for you to fill out an application for Energy Assistance this year. You have been selected to participate in the automated process because Social Security or Veterans Benefit was the only income listed on your energy assistance application last year. This process will automatically make an energy assistance payment to your utility on your behalf. Payments will be made after October 1.

The benefit amount will be based on your income, updated if necessary, for the cost of living adjustment you received in January, and the number of household members listed on your last Wisconsin Home Energy Assistance Program Application.

Your total monthly income is listed as: \$1,562.00 Your reported number of household members: 1 Your cost of living adjustment was 1 percent.

Your heating provider listed below will be sent an estimated payment amount of \$196.00 Primary Heating Fuel Provider

Name: XCEL ENERGY (NSP)

Phone: (800) 842-4565

Your non-heating electric provider listed below will be sent an estimated payment amount of \$79.00. Electric Provider

Name: WE ENERGIES Phone: (800) 331-5262

If there have been changes in your household including a change in the number of people in your household, a change in your address, or you have new sources of income, then please contact the agency listed at the top of this letter. You will need to complete a new application to receive Energy Assistance.

As a participant in this program you may be contacted for follow-up or quality assurance purposes. If you have any questions regarding this process or your Energy Assistance benefits for the upcoming heating season please contact the agency listed at the top of this letter.

Sincerely,

The Wisconsin Home Energy Assistance Program



# Appendix H | Required HE+ System Notes

As a best practice, workers processing WHEAP applications shall create HE+ System Notes in the following circumstances:

- When a household's annual fuel costs are unusually high or low, to verify that the unusual annual usage amount is not due to a keying error
- When a decision was made on an application based on guidance from the HE+ Help Desk
- Whenever a worker has phone, email, or mail correspondence with the customer about scheduling an application appointment, the status of a check, or any other inquiries or complaints about the application
- When an application is incomplete, to explain what information is missing and why the application is "On Hold"

The table below is an index of the HE+ System Notes requirements that appear throughout the WHEAP Manual. Please note that workers must read each indicated policy in its entirety for full information about the required HE+ System Notes.

Subject	Policy	Note Requirement			
Program Introduction	Program Introduction				
Hearings	1.8.2	Appeal requests shall be documented in a log and summarized in HE+ System Notes.			
General Eligibility Rules and Guidelines					
Application completed after May 15	2.1	Explain why the application was backdated to May 15.			
Residency	2.2.2 and 2.2.6	If a case head or household member lives in more than one residence, explain how their primary residence was determined.			
Roomers	2.2.2.2	Document number of sleeping rooms in the rooming house.			
Eligible Non Citizon	2.2.2.4	Document method used to verify FoodShare or Social Security income.			
Eligible Non-Citizen		Identify the document viewed to verify lawful status in the U.S.			
SSN Exceptions	2.2.3.3	Explain reason for no SSN and include proper documentation.			
Religiously Exempt	2.2.3.3.2	Add the ITIN to an HE+ System Note.			
Household Member Over 60 days Old	2.2.3.3.4	SSN situation must be fully documented in HE+ System Notes. Proof that SSN was applied for should be uploaded to misc. documents; if SSN has not been applied for, include timeline of events that have occurred to date, and next steps. Application must include HE+ System Note from the Division stating that an exception was granted.			
SSN Override	2.2.3.4	Give reason for the SSN override request. The Division will add HE+ System Notes approving, denying, or asking for more info.			
Change SSN Request	2.2.3.5	Explain that the application was first entered with the wrong SSN. When deleting an application because of a wrong SSN, the worker's note should include the PID that the application was originally entered under.			
Student Status	2.2.4	If a student is eligible for WHEAP due to a disability, explain how the individual's disability was verified.			



Subject	Policy	Note Requirement		
Counting Children	2.2.6.1	Document what the applicant stated about child(ren)'s living situation in shared living situations, and how it was determined to include or exclude child(ren).		
Categorical Eligibility	2.3.1	When a household is over income but is categorically eligible, explain how the categorical eligibility was verified. For FoodShare, include which household members and which months they received FoodShare.		
Income				
Interest and Dividends	2.3.2	Document in source field or an HE+ System Note each source of interest or dividend income reported (enter all sources as one income entry).		
Present-Month Income	2.3.2	If the present month is being used as the income test period for a WHEAP application, document the household's prior month income with an HE+ System Note in addition to uploading documents to verify the prior month income.		
Self-Generated Income	2.3.5.1	If there are no guaranteed payments listed on the Partner's K-1 form, document that no guaranteed payments were received for this partnership.		
Self-Generated Income	2.3.5.1	If self-generated income ended prior to the test period, explain this and include the business operation end date.		
Zero Income	2.3.5.4	When a ZIF is not required because verification of ignored income was used for the required document upload, explain why a ZIF was not completed.		
Seasonal Workers' Income	2.3.6	Document the information used to determine an individual is a seasonal worker.		
Application Process				
Pending app for zero-income interaction	3.1.1	Explain when a zero-income application is "Pending" for interaction with the applicant.		
Fraud Prevention	3.1.10	Name of the manager/supervisor who reviewed the application of an agency employee, former employee, or relative or family member of an agency employee.		
HE+ Short Application Form	3.2.3	When a household submits a short application form but does not meet the short application form criteria, document how the full application process was completed.		
Automated Applications	3.2.4	When a customer contacts the agency with additional information on an automated application, document the information that was updated and requested.		
Phone Applications	3.2.5	Document what additional information was requested.		
Verification of Information	3.3.2	When the verified application information differs from the submitted paper application, explain the differences.		
		If information on a current year application differs from application history, explain the differences.		
Validation of Applicant Data	3.3.3	Document the reason for bypassing system validation functions (MCI, WEFI).		



Subject	Policy	Note Requirement
Online Application Processing	3.3.4	If verbal notice is provided to the customer of missing information to complete the validation process, document that verbal notice was provided and describe the missing required information.
		If an online application is voided, explain the reason and state when customer contact occurred.
Updating Online Statuses	3.3.4.2	If application status is changed, explain the reason and state when the customer was notified.
Validating Online Applications	3.3.4.3	When voiding an online application because it is a duplicate, document why the application was voided and when the customer was contacted.
Updating an Application Created by Another Agency	3.3.5.1	Explain the document upload, including the method of contact with the customer and the date of contact with the customer.
Completing an Application Created by Another Agency	3.3.5.2	Explain the situation when the "ownership" of an application is transferred due to a customer's emergency situation.
"Withdrawn" Application	3.4.5	Explain the reason for the customer's withdrawal.
Field 7 Housing Type	3.4.13	If the housing type is "Motel or Camper/RV" provide a full description of the situation.
		Document the reason for selecting the housing type when the residence does not meet the "typical" housing definition.
Field 8 Mailing Address	3.4.14	If the mailing address differs from the residence address and is not a PO Box, explain why the two addresses are different in an HE+ System Note.
		When the HE+ System does not validate the mailing address, an <b>Address Note</b> is required to explain how the address was verified as deliverable by USPS.
Field 9 Residence Address	3.4.15	When a residence address returns a message that the address has been processed for another case head, provide documentation of the validity of a second application at the same address.
Field 10 Ownership Type: Own or Rent	3.4.16	When an applicant is not able to provide all three data elements for the landlord in field 12, provide the available partial landlord information and explain that all three data elements are not available.
Field 12 Living Situation	3.4.18	Documentation of proof of permanent address for applicants who are currently homeless moving to a permanent residence.
Field 13 Is Government Assisted Housing: Rental Assistance	3.4.19	When housing assistance is "yes" and utilities are included in rent, explain which utilities are included in rent.
Field 14 Guardian Type: Designated Representation	3.4.20	Document form of verification viewed. When Authorization of Representation is viewed, include duration of authorization.
		When a minor child is case head, state who signed the certification page.



Subject	Policy	Note Requirement	
Income			
Household Income	3.4.27	Provide any necessary clarification about how income was calculated. If the application is incomplete due to missing income documentation, explain what information is missing.	
Self-Certification for	3.4.27.2	When self-certification is required because third party verification of ignored income is not available, document attempts made to obtain third party verification.	
Zero Income		Explain any ignored income.	
Households		Explain when an application is pending for customer interaction.  Document when a needed customer interaction is completed and include any missing ZIF information.	
Use of the Zero Income Form	3.4.27.3	Explain any follow-up that was completed because a ZIF was incomplete or needed additional information.	
Fuel			
Basic Fuel Page Rules	3.4.28.1	When there is no electricity for a household (there is no relationship with an electric vendor), document why no electric fuel type was entered.	
Energy Fuel Type	3.4.28.3		
Non-Heating Energy Costs	3.4.28.12		
Primary Heating Fuel	3.4.28.2	When selecting "wood or other" for the primary fuel type, identify the primary fuel type if the fuel type is not wood.	
Energy Fuel Type	3.4.28.3	primary ruer type if the ruer type is not wood.	
	3.4.28.4	When annual fuel costs are not available and zero is entered for the annual costs, explain why zero costs were entered.	
Payment Method		When payment method "Heat and/or non-heating electric is included in rent", "Separate payment to landlord, mobile home park owner, or no direct account with vendor", or "do not pay" is selected, document how this information was verified.	
Annual Fuel Cost	3.4.28.7	When the HE+ System prevents entry of usage over \$7,000, explain the likely cause of the high fuel usage.	
		When less than 12 months of costs are provided, indicate how many months of costs were provided and why 12 months are not available.	
		If a customer has used multiple deliverable fuel vendors and costs from all vendors are not available, enter available costs and explain why this is not the full annual costs.	
		If fuel costs are available and "0" is entered to use the proxy amount, explain why "0" was entered.	
		When entering actual fuel costs for a duplex, state if there is a shared meter or not.	



Subject	Policy	Note Requirement		
		Document any discrepancies between the WEFI results and the information entered on the application.		
Account Name and Household Relationship	3.4.28.8	When selecting "other" as the account holder, explain this individual's relationship to the household.		
Enter Name on Account	3.4.28.9			
Shared Meter	3.4.28.10	Explain what additional dwelling the meter is shared with. If this dwelling is a business, select "business use" and state what type of business is on the same meter.		
		If business occurring in the home has little impact on the home energy use, document this in a note.		
Business Use on the Account	3.4.28.11	If the business use questions result in a situation that is questionable, indicate the applicant's answers to the test questions.		
		Describe the source of income and what test was used to determine business use or no business use.		
Non-Heating Energy Costs	3.4.28.12	If a household is without an electric burden, provide an explanation.		
Applicant Signature Date	3.4.29	When a certification page is received without a date, explain that the applicant did not date the certification page.		
Emergency Crisis and Prevention Assistance				
Denials of Eligibility	4.2.1.1	If customer is denied Prevention Assistance, explain customer's request and the denial.		
Emergency Crisis and Prevention Assistance Amount	4.2.1.2	Document the vendor minimum payment requirement for the crisis request.		
Prevention Assistance Eligibility - Additional Guidelines	4.2.3	The reason for the assistance must be included in either an HE+ System Note or the "Customer Request Reason" field.		
Exceptions to the Applicant Contribution Requirement	4.2.5	Describe the circumstances that justify granting the exception.		
Emergency Crisis Assistance: General WHEAP Agency Responsibilities	4.3.1	If the service date is beyond 48 hours from the request date for emergency services, document when the customer was contacted after the request.		
		Enter an explanation for each crisis occurrence (in HE+ System Notes <b>or</b> in the "Customer Request Reason" field) of the circumstances of the crisis and how the crisis service will assist the customer.		
Prevention Assistance: General WHEAP Agency Responsibilities	4.4.1	If the service date is beyond 48 hours from the request date for prevention services, document when the customer was contacted after the request.		
Entering Crisis and Prevention Assistance Applications	4.5.2	Document any discrepancies with the WEFI call.		
		If Crisis Assistance is being paid on a closed account, explain the reason.		



Subject	Policy	Note Requirement		
		Explain the circumstances of the crisis and how the crisis service will assist the customer in an HE+ System Note or in the "Customer Request Reason" field.		
Quality Assurance				
General Quality Assurance (GQA) Agency Responsibilities	5.4	At the time of the review, add an HE+ System Note to each general case, identifying it as having been reviewed.		
		Indicate why an application is being corrected.		
Furnace Quality Assurance (FQA)	5.5	At the time of the review, add an HE+ System Note to each furnace case, identifying it as having been reviewed.		
Agency Responsibilities		Indicate why an application is being corrected.		
Errors, Mistakes, Correc	ctions			
Master Record	6.1	Explain changes made to Master Record (not currently available).		
Change in Address	6.1.1	When updating the mailing address prior to an extraction of an application, explain the move/change of physical address.		
Updates to Unextracted Applications	6.3.3	Explain why a "Submitted" application was changed to "Pending".		
Denied in Error and Extracted (Reinstate the Application)	6.3.4	Explain the error.		
Errors Which do not Affect the Benefit(s)	6.3.6.1	Describe the corrected information and the impact to the application.		
	6.3.6.2	When neither benefit is affected by more than \$30, provide the correct information and explain the benefit calculation results.		
		If either or both benefits are affected by more than \$30, explain why the application is being corrected.		
Errors Which May Affect the Eligibility/Benefit(s)		For overpayments made to bulk fuel vendors, if the correction can be made before the vendor has delivered the fuel, document when vendor was contacted and verified that the customer balance is sufficient to cover the overpayment.		
		Explain how it was determined who is responsible to pay back overpayments and how vendor was notified.		
Errors Which Affect Wx	6.3.6.3	Fully document the situation.		
Wrong Account Number Entered	6.3.7	Explain what happened and what corrective action was taken.		
Deceased Individual	6.3.9	Indicate how the agency learned of this information.		
		If deceased status is changed to not deceased, document the change of the status.		
		If a paper application is received with a household member who is now listed as deceased, document that an individual listed on the application is now marked deceased.		



Subject	Policy	Note Requirement			
Automated Applications: Change in Household Composition or Income	6.4.2	Explain what was changed (household members or income) and why.			
Automated Applications: Change in the Address (Moved)	6.4.3	Document why the fuel account was still active during the automated application process. Explain the household changes that occurred.			
Crisis Paid to Wrong Account	6.5.2	Indicate the date the request was made to the vendor to transfer the benefits.			
Payment Adjustments, I	Payment Adjustments, Refunds, and Returns				
When a Notice is Returned by Post Office	7.6.2	Explain that the notice was returned and the steps taken to determine the applicant's correct mailing address.			
When a Single Party Check is Returned by the Post Office	7.6.3	Enter a note about the returned check whether there is a new address or no forwarding address was provided.			
Lost, Stolen or Destroyed Benefit Checks	7.8	Single Party Check: Document that an Affidavit was received and a stop payment request was sent to the Division.  Document the customer's mailing address in HE+ System Notes.			
		Single Party Check issued to the applicant in error: Explain the situation in addition to notifying the Division.			
		Stale-Dated Checks: Explain the request from a customer regarding a stale-dated check.			
Administration					
Fraud	8.2.9	HE+ System Notes are required for all fraud investigation cases.			
Processing Applications of Relatives and Friends	8.5.1.2	Indicate the manager/supervisor who reviewed the application.			
Contract Invoicing					
Guidelines for Invoicing	9.3	Explain any "zero" entries.			
Appendix					
Appendix B - WHEAP Application Income Types		<sup>4</sup> When Wage Attestation Form or bank statement is used, explain why customer could not provide a check stub or recent tax return.			
Appendix I - LIHWAP Manual		Crisis Paid to Wrong Account: Indicate the date request was made to the vendor to transfer the benefits. Include the correct information (account number, name).			



# Appendix I | Wisconsin Low-Income Household Water Assistance Program (LIHWAP) Manual



# WISCONSIN LOWINCOME HOUSEHOLD WATER ASSISTANCE PROGRAM (LIHWAP) – Manual

STATE OF WISCONSIN, DEPARTMENT OF ADMINISTRATION DIVISION OF ENERGY, HOUSING AND COMMUNITY RESOURCES UPDATED 09-12-2022



### **Chapter 1: General Information**

### Introduction

The Wisconsin Department of Administration's (DOA) Division of Energy, Housing, and Community Resources (DEHCR) developed this manual as a resource for the Low-Income Household Water Assistance Program (LIHWAP). LIHWAP agencies are required to follow all policies and procedures in this guide.

### **Low-Income Household Water Assistance Program Overview**

Funds provided by the Division shall be used to provide financial assistance to assist eligible low-income households, particularly those with the lowest incomes, that pay a high proportion of household income for drinking water and wastewater services.

Financial assistance may be provided to reduce arrearages of eligible recipients. Benefit payments are issued via the Home Energy Plus (HE+) System and checks are issued to an approved water utility vendor.

The program expires at the earliest of either the exhaustion of funding or as identified in the Period of Performance in the contracts. The program will end upon notification from the Division.

Agencies shall use the HE+ System to determine eligibility, process applications for crisis assistance, and upload all required documentation.

### **Source of Funding**

The LIHWAP was authorized under two separate appropriations as part of an emergency effort to respond to COVID-19. LIHWAP does not have a permanent or ongoing statutory authorization or appropriation beyond the current funding.

The Consolidated Appropriations Act, 2021 (Public Law No.: 116-260) signed on December 27, 2020, included \$638 million in funding with instructions for the Administration for Children and Families (ACF) within the U.S. Department of Health and Human Services (HHS) to carry out grants to states, territories and tribes to assist low-income households with water and wastewater bills. Additionally, on March 11, 2021, the American Rescue Plan Act of 2021 (Public Law No.: 117-2) appropriated an additional \$500 million to LIHWAP.

### **Payment for Operational Expenses**

LIHWAP Operations -

- 1. Allowable program operations costs include:
  - a. Staff costs to accept and process WHEAP and LIHWAP applications throughout the contract period,
  - b. Verifying application information,
  - c. Processing applications, including entering data into the HE+ system,
  - d. Outreach activities as defined in WHEAP Manual Section 8.3.4.3
- 2. Allowable administrative expenses include:
  - a. Supervisor and coordinator salary and fringe,
  - b. Travel for meetings and training,
  - c. Clerical support salary and fringe,



- d. Supplies, services and equipment,
- e. Indirect shared agency administration costs, and
- f. Fraud investigation.

### **Program Funds**

Program funds (Crisis Benefits) are used to restore disconnected water services and to pay off arrearages to prevent disconnection of water service.

LIHWAP Crisis Codes are as follows: (See Chapter 4 for water code crisis entry)

LIHWAP CAA-WA	Drinking Water Assistance
LIHWAP CAA-WWA	Wastewater Assistance
LIHWAP CAA-MWA	Multiple Water Assistance
LIHWAP ARPA-WA	Drinking Water Assistance
LIHWAP ARPA-WWA	Wastewater Assistance
LIHWAP ARPA-MWA	Multiple Water Assistance

Agencies must ensure proper codes are used to support accurate federal reporting requirements.



### **Chapter 2: Program Administration**

### **General Administrative Structure**

To receive LIHWAP funds, agencies must commit to providing the services mutually agreed upon in the contracts. The agency must maintain primary responsibility for all contractual issues.

### **Conflict of Interest/Non-Disclosure**

Agencies must comply with WHEAP Manual Sections 8.2.5, 8.5.1.1 and Appendix A.

### **Program Integrity**

Agencies must comply with WHEAP Manual Sections 3.1.10, 8.2.9, 8.5.1.1, 8.5.1.2 and Appendix A.

### **Monitoring**

Agencies shall participate in Division conducted quality assurance activities including Fiscal Operations, Program Operations, Program Integrity and General and LIHWAP application processing.

The contracted agency is responsible for conducting internal LIHWAP Quality Assurance (LQA) reviews. During internal quality assurance reviews, the LIHWAP Crisis Application and the General (parent) WHEAP Application must be reviewed as LIHWAP eligibility is partially determined from WHEAP eligibility. This internal quality assurance review is a means to ensure that LIHWAP workers are correctly interpreting and applying LIHWAP requirements and policies. In addition, review results should be used to identify areas that should be included in internal trainings.

Using the DEHCR LIHWAP Quality Assurance tool, the contracted LIHWAP agency shall complete required internal LQA reviews on PY2023 Applications:

- 20 cases no later than 10/31/2022
- 20 cases no later than 01/31/2023
- 20 cases no later than 03/31/2023
- 20 cases no later than 06/30/2023

At the time of the review, agencies shall add an HE+ System note to each general and LIHWAP application, identifying it has been reviewed.

Internal QA reviews of General WHEAP Applications shall include but shall not be limited to:

- Proper income verifications and uploads
- Proper energy fuel information
- Proper outreach and interactive types
- Proper Signatures (when applicable)
- Proper System note documentation



Internal QA reviews of LIHWAP Crisis Applications shall include but shall not be limited to:

- Proper water bill verifications and uploads
- Proper System note documentation
- Proper payment in correlation with the documented arrears amount
- Proper Service Type (crisis code) selection
- Proper response to 'Performance Measures' questions

### **Record-Keeping and Retention**

Agencies shall follow the General Record Retention Policy in WHEAP Manual Section 8.5.3.



### **Chapter 3: Program Requirements**

### **Eligible Assistance Activities**

Eligible forms of assistance include the following:

- Water and wastewater bill charges are allowable under the Consolidated Appropriations Act, 2021 and the American Rescue Plan Act of 2021
- Applicants are required to provide proof of water-related charges via submittal of a bill from the utility provider
- The agency shall upload the water bill and LIHWAP Renter Verification Form (if applicable) to the HE+ System to the water bill repository.
- The agency shall record the Account Name and Account Number from the water bill on the LIHWAP Crisis Application
- Payments for water and wastewater will be paid as a "one-time" amount and will be counted as only one month of assistance. This policy is because many municipal water providers do not have the capacity to break down the arrearages on an account.
- The HE+ System issues the payment to the utility
- Arrearages are allowable under LIHWAP
- Late fees, reconnection fees, and other similar charges are allowable under LIHWAP with
  the understanding that the fees are consistent with fees charged to non-LIHWAP
  households \*all fees must be associated with the water or wastewater portion of the bill
- If charges for drinking water and wastewater are not itemized by the Water Vendor, the agency shall include all applicable charges using the LIHWAP CAA-MWA or ARPA-MWA Service Type
- For renters with water included in rent, a percentage of the rent may be included in the LIHWAP benefit to offset the water charges
- When bills aren't itemized a percentage of the bill for water and/or wastewater can be applied as a benefit

Agencies are expected to prioritize eligible households based on the following order:

- 1. Restoration of services to households that have had drinking water and/or wastewater services disconnected due to arrearages
- 2. Prevention of disconnection for households at risk of disconnection due to arrearages
- 3. Benefit payment of current water bill charges

### **Program Eligibility**

Households eligible for LIHWAP are required to meet the financial and non-financial eligibility requirements for the Wisconsin Home Energy Assistance Program (WHEAP). However, eligible households will have to demonstrate a water burden. Please see <a href="Chapter 2">Chapter 2</a> of the WHEAP manual to learn more about General Eligibility.

Renters whose utility payments are included in their rent are eligible for assistance with their heating and electric services through WHEAP. Likewise, renters with water service included in their rent are eligible for assistance through LIHWAP. Agencies shall work with the landlord, water supplier, and the LIHWAP customer to get supporting documentation to pay off the arrears to the water supplier for the LIHWAP customer.



### **Application Processing**

Applications shall be processed according to the Wisconsin Home Energy Assistance Program (WHEAP) Manual and are based on current WHEAP income guidelines and income verification. See WHEAP Manual Appendix E for a current income guidelines table. The current income guidelines are also posted to the Division public website: <a href="https://energyandhousing.wi.gov">https://energyandhousing.wi.gov</a>. For renters with utilities included in rent, the Division requires a written statement from the landlord stating the amount of rent reduction to the rent. In addition, renters whose income was directly or indirectly affected by COVID-19 may also receive assistance with water service and utility payments that are included in their rent through Wisconsin's Emergency Rental Assistance Program.

### **LIHWAP Crisis Payment Process**

Customer benefit payments shall be made to water vendors that are active in the HE+ System.

- If vendors are not found in the HE+ System, contact the Help Desk\* for more guidance
- Payments shall be made only for allowable assistance benefits unless approved by the Division
- The preapproved, per crisis payment, benefit range is \$30 to \$5,000. Any benefit amount exceeding \$5,000 requires Help Desk approval
- Agencies must respond to customer requests for water assistance within 48 hours of the request date
- Agencies must contact the customer before issuing water benefits to ensure that the customer is still residing at the address on their regular application as well as contacting the vendor to confirm the account is still active

\*Help Desk: heat@wisconsin.gov or call 608-267-3680

### Cancel/Refunds

### Crisis Paid to a Vendor in Error

Agencies shall conduct a cancel/refund for any LIHWAP Crisis paid in error other than an incorrect account number. Before a cancel/refund is conducted agencies shall notify the customer and vendor of the cancel/refund. For guidance on crisis benefits paid to the correct vendor but with the wrong account please continue to the next section for guidance.

### **Crisis Paid to Wrong Account**

If a crisis benefit is paid to the correct vendor but wrong account name or number, the agency shall:

- 1. Notify the vendor of the incorrect and correct account information,
- 2. Request the benefits be transferred to the correct account name/number,
- Enter HE+ System Crisis Notes to indicate the date the request was made to transfer the benefits. Also, add HE+ System Crisis Notes with the correct account information. (Name, Address, Account Number)



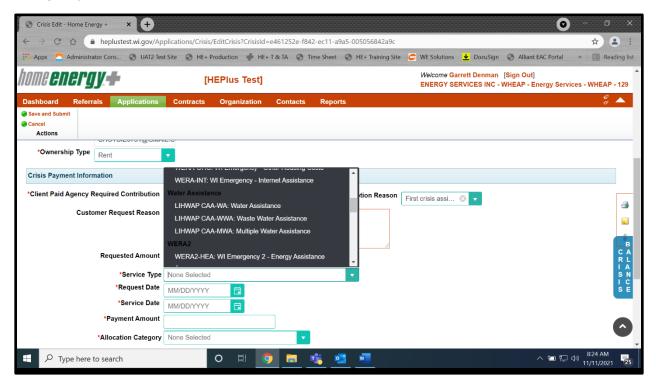
## **LIHWAP Crisis Application Desk Guide**

Step 1: Click "Add New Crisis"



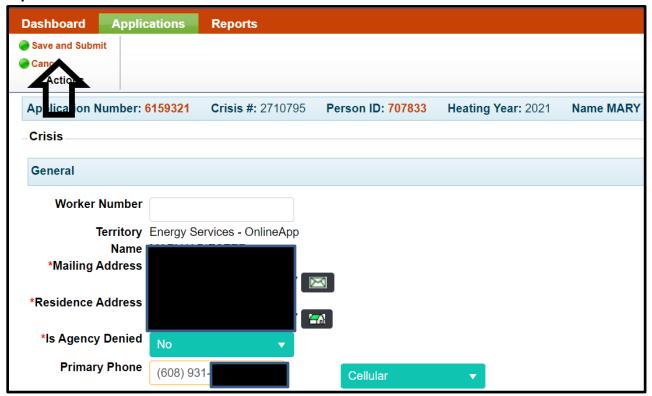
**Step 2:** Complete the required fields of the crisis application and select the appropriate Water Assistance crisis code.

The Request Date is the date the customer requested assistance and the Service Date is the date the agency responded to the request.

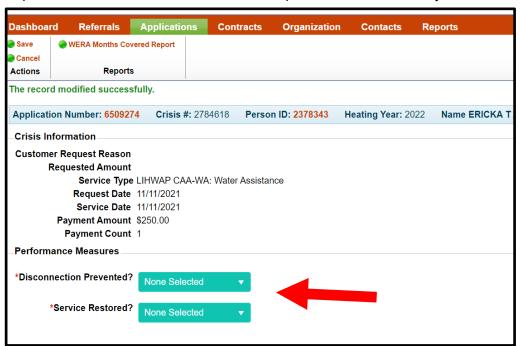




Step 3: Click "Save and Submit"



**Step 4:** The System will indicate "The record modified successfully". The worker then needs to answer the two "Performance Measures" questions. \*Please note: the application does not change to paid submitted status unless one of the questions is answered "yes".





**Step 5:** Navigate to the paperclip on the right of your screen to find the Water Bill document repository.



Step 6: Click "Manage" and then "Select Files" to upload the Water Bill.

Once the documents have been uploaded, click "Save and Submit" and the crisis application changes to "Paid Submitted" status.

