MEMORANDUM: LIHEAP 20-03

TO: Low Income Home Energy Assistance Program Subgrantees
FROM: Blake Worthington, Housing Program Manager- Energy
DATE: April 6, 2020
SUBJECT: LIHEAP Program Updates Due to COVID-19

These are temporary LIHEAP programmatic updates that are being made in order to address the COVID-19 National Emergency. These programmatic updates will go into effect on April 6, 2020 and will be allowed through the remainder of the program year ending on September 30, 2020.

LIHEAP Manual Chapter 2 – Application Processing and Eligibility
Section 2.5 Client Eligibility, 2.8 Priority Points and Benefit Matrices

- Households that are within 60% of State Median Income can receive assistance. Maximum income eligibility will be updated to 60% of State Median Income in THO. Households that are within the 126% Federal Poverty Guidelines and 60% State Median income will receive 15 priority points.
Digital, electronic, scanned or photographed copies of signatures are allowed on applications and all forms. Agencies should have dedicated email address that is used for clients to send applications.

Verbal verification via telephone can be taken for application signatures and form verification.

- The person obtaining verbal confirmations/verifications must document the following on each item verified:
  - Date of initial contact by client
  - Name of person taking the verbal information (subgrantee)
  - Person they are receiving information from (applicant)
  - Date verbal verification received
  - Time of verbal verification
  - Method of receipt (i.e. Telephone)

- The subgrantee must receive verbal consent from the client to allow verbal verification on each form. The client’s consent to allowing verbal verification must be documented on each form in the steps outlined above and noted in THO. If a client refuses to allow verbal verification another intake method must be provided. (i.e. mail, drop off, electronic)
LIHEAP Manual Section 2.6 Income

- Zero Income can be determined with proof of client employment termination or the Zero Income Form. Zero Income can be determined at the time of application and projected forward instead of using the past 30 days. If applicable, clients should note the reason for zero income related to COVID-19.

- Direct stimulus benefit payments from the State or Federal Government due to COVID-19 are excluded from countable income for LIHEAP.

- Any type of unemployment payments will be counted as income as described in Section 2.6.2 Calculation of Unemployment Income of the LIHEAP Manual.

- An Income Verification due to COVID-19 Form has been created and is attached to this memo as Attachment A. This form should be filled out if the client is unable to obtain paystubs from their employer due to COVID-19. Subgrantees are not required to call and verify. This is for recorded documentation in the client file only.

- Emailed documents, scanned documents, faxed documents and photographed documents should all be accepted. The subgrantee should have one dedicated email address for applications and documents to be sent to. Subgrantees must notify clients that the application and/or documents have been received and document the date and individual who provide the notification or receipt. (i.e. phone call or return email.)

- After all verification avenues listed in LIHEAP Operational Manual are exhausted applicants can be allowed to use their prior year’s Social Security award letter (the subgrantee must add the COLA adjustment)

- In case by case situations the client’s bank statements or other non-standard documentation could be used to verify income if approved by THDA. Requests to use bank statements or other non-standard documentation must be sent to LIHEAP@thda.org on a case by case basis.

During this time please reach out to THDA for verification and exception requests based on extenuating circumstances due to COVID-19. Any rule exception request must be emailed to LIHEAP@thda.org and will be decided on a case-by-case basis.