LIHEAP Agency: _____ **Contract #:** _____

Person Interviewed: _____ **Title**: _____

Date: _____ **Audit Period:** _____

A. Application Intake

1. Are applications provided immediately to applicants upon the request for the service, including mailing to clients who cannot come into the Office?

2. Are only state approved LIHEAP applications used?

3. Does the agency accept the application originating from the THDA State website? Is the LIHEAP application available on any other agency website? If yes, please list insert link.

4. Does the agency assist applicants, as needed, with the completion of their applications? Please list any non-agency partners that assist LIHEAP applicants with filling out applications.

5. Describe your agency's process for accepting regular LIHEAP applications?

6. Does the agency accept applications for crisis assistance through the contract period regardless of the availability of funds? (Provide copy of county budget allocation)

7. When available funds are expended, does the agency maintain a waiting list during the contract period with carry over to the next funding cycle?

8. Are applicants on the waiting list at year-end required to re-apply for the new program year?

9. What application documentation is maintained in a client file? List all forms and documentation placed in an applicant file.

10. Describe the referral process for LIHEAP applicants who are interested in weatherization assistance for the Weatherization Assistance Program.

B. <u>Eligibility Determination</u>

1. Are applications reviewed, eligibility (approved/denied) determined, within 30 days and was the benefit applied within 90 days?

2. Describe the process when an incomplete LIHEAP application is received?

3. Is citizenship or legal alien status verified for all household members?

   a. How is citizenship or legal alien status verified?

   b. Does the Agency retain documentation to verify Social Security Numbers?

4. How does the agency handle households with members that do not have a Social Security Number?

5. How does the agency handle households with members that refuse to provide a SSN?

6. Are current household incomes for customer applications being correctly determined and verified in accordance with the LIHEAP Manual and program regulations?

7. Are the correct federal income eligibility guidelines being observed in determining customer eligibility?

8. Is documentation of uncontrollable circumstances being obtained for emergency crisis applications?

9. Is the client's energy burden being calculated correctly?

   a. Does the agency require 12 months of energy usage information to calculate energy burden?

   b. How does the agency handle applications without 12 months of energy usage documentation?

   c. What is the agency process if an applicant provides less than 12 months of energy usage?

10. Is the Priority Points System being utilized to correctly rank applications and determine benefit levels?

11. How does the Agency determine which households are to receive priority in assistance when sufficient funds are not available to serve all households with the same number of points?

12. How does the Agency ensure that the correct benefit amount is awarded? Does the Agency employ the THO Software System to determine the entitlements under the LIHEAP program?

13. Please provide the name and title of the staff who approves the benefit amount awarded?

14. Do supervisors review a sample of case files/applications for quality assurance?

    a. What method and process do the Agency supervisors use for selecting a sample of client applications for review?

    b. How is the review documented? (Please provide a copy of most recent review)

    How does the Agency ensure that crisis applications are processed and assistance is provided in 48 hours, or 18 hours if the household is in a life-threatening situation?

15. Does the Agency ensure that the applicant or any members in the household has not already received assistance in the current federal fiscal year?

16. Does the Agency match the applicant's address on the application with the location for which services are being provided?

C. <u>Security & Maintenance of Records</u>

1. What procedures in place to safeguard the confidentiality of customer files to ensure that only authorized personnel have access to the records?

2. Are employees trained on client confidentiality, ethical conduct and release of information?

3. Does the agency hold mandated HIPPA Compliance training annually? Is the training documented?

4. Is access to client files restricted?

5. Who has access to client files?

6. How are files secured during working hours?

7. How are files secured after working hours?

8. How long do you maintain client records and what is the process for securing records on and off-site?

D. Vendor Agreements with Home Energy Suppliers

1. Are vendor agreements in place for those energy suppliers that are receiving payments? (A randomly selected Vendor Agreement will be copied)

2. Does the vendor agreement stipulate that the Home Energy Supplier agree to and abide by the following terms and conditions:

    a. To participate in the LIHEAP program in accordance with state and federal regulations.

    b. To accept benefit checks and vouchers on behalf of eligible households for the purpose of providing LIHEAP services for clients identified to receive such benefits.

    c. To apply benefit check or voucher amounts to the energy accounts of eligible and certified households.

    d. To record the LIHEAP payments to the Home Energy Supplier's books as a credit to the households' accounts.

    e. To refund any LIHEAP credit balances to the LIHEAP agency who made the payment on behalf of the customer, if the customer terminates their service.

3. Have any complaints been received by the Agency from the energy suppliers regarding the timely issuance of customer benefit payments?

   If so, what action has the Agency taken to address the complaints?

4. Has the Agency or certified eligible LIHEAP recipients identified problems with the Home Energy Supplier not performing in accordance with the vendor agreement?

   If so, what action was taken by the Energy Supplier to address the complaint or noncompliance?

5. What controls does the Agency have in place to ensure that energy providers were not suspended or debarred in accordance with the State Plan and federal regulations? When are checks completed and how are they documented? (Check website for a current vendor to verify that they are not suspended or debarred)

E. Appeal Procedures

1. Does the Agency have an established formal process and procedures by which customers can file appeals or grievances if LIHEAP assistance is denied or applications are not reviewed and acted upon with reasonable promptness? (If there is an appeal, need examples of correspondence)

2. Are the appeal procedures explained to all potential clients?

3. Are the appeal procedures provided at the time of application denial?

4. How are informal complaints documented and resolved?

5. Does the agency post appeals and grievance procedures? If so, where is the posting located?

F. Assurance 16 Activities

1. Does the agency participate in Assurance 16 Activities?

    a. Explain what activities are utilized for Assurance 16?

    b. Explain what current activities have been completed to date and provide documentation of activities?

    c. What are the proposed indicators of success or impact of your agency's Assurance 16 activities (what your agency measures or assesses to determine success or impact)? For example, indicators of success for energy education classes could include increased knowledge of households about energy usage or their actual energy usage.

    d. What kinds of data collection or information gathering techniques does your agency use to measure the success of the Assurance 16 program (i.e. surveys, etc.)? Please provide documentation.

2. How much of the agency's budget is spent on Assurance 16 Activities?

G. Outreach Questions

a. Explain the outreach activities and partnerships that have been completed to date for reaching targeted populations (i.e. elderly, individuals with disabilities, and families with children under 6).

b. Does your agency track outreach activities in order to evaluate which events/sites were more effective than others?

c. What other ways does your agency assess the effectiveness and success of your outreach efforts?

H. Other Questions

1. Does the agency have termination of services process and procedures in place in the event assistance is terminated due to a violation of program requirements? Is there a timeframe for how long the services will be terminated? (If yes, obtain documentation)

2. How does the agency differentiate regular heating and cooling assistance?

3. Does the agency offer assistance for all fuel types during heating and cooling seasons?

4. Does the Agency have a Continuity of Operations Plan to address emergency preparedness planning in the event of an emergency or threat?

5. What is the agency's procedure if a client seeks to apply for assistance afterhours or when the office is closed?

6. Is a Conflict of Interest policy/statement that is signed by all employees involved with the LIHEAP program? (A current signed statement will be requested for review while on-site)

7. Is the Agency submitting program reports, both client services and financial reports, at the frequency prescribed by the state?

8. Does the Agency hold mandated HIPAA Compliance training annually? Is the training documented?

I. Title VI and Civil Rights Compliance

1. Does the Agency have nondiscrimination policies in place in order to not exclude any person from employment or participation in the program based on the grounds of race, color or national origin?

2. Does the Agency comply with its nondiscrimination policies in determining eligibility and service provision?

3. Do the Agency's nondiscrimination policies and procedures include how clients are informed of their Title VI rights?

4. How does the Agency inform its clients of their Title VI rights? Does the Agency have postings regarding nondiscrimination and where are postings located?

5. Do postings, program brochures and other program related materials provided to the public include a non-discrimination statement and complaint procedures?

6. Is multi-lingual information (applications, postings, program brochures, and other program materials) needed and/or provided?

7. Does the Agency have a Limited English Proficiency (LEP) policy and procedures regarding the provision of interpreter/translator services for clients who have limited English speaking abilities?

8. Does the Agency have a Title VI Coordinator whose responsibilities include compliance with Title VI regulations and the handling of discrimination complaints? If so, provide his/her name?

9. Does the Agency have formal procedures for handling discrimination complaints?

10. Does the agency address discrimination complaints in accordance with their nondiscrimination policy and procedures?

11. Has the Agency received any discrimination complaints with any services being provided in the last 3 years?

12. If complaints have been received, have they been investigated and has any action been taken? If so, what was the outcome of the investigation and the action taken?

13. Are employees trained annually regarding Title VI compliance, provisions and servicing clients with Limited English Proficiency? Identify the date of the last training?

14. Does the Agency maintain documentation of the Title VI training provided to staff? (Get copies of Sign-Up sheet)

Summary – summarize any control weaknesses, noncompliance or deficiencies below: