

Low Income Household Water Assistance Program (LIHWAP) POLICY

SECTION 100

PROGRAM OVERVIEW

101 BACKGROUND

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 the new LIHWAP effort.

The full appropriations language from both the Consolidated Appropriations Act of 2021 and the American Rescue Plan Act are available on the Office of Community Services (OCS) website through the following weblink:

<https://www.acf.hhs.gov/ocs/law-regulation/lihwap-laws-and-regulations>

101.1 Introduction

The purpose of the Georgia Low Income Household Water Assistance Program (LIHWAP) is to provide appropriate and timely financial assistance to:

- Low-income eligible households
- Assistance includes water service restoration, past-due obligations, and future bills
- Provide water crisis assistance to households experiencing water-related emergencies that are life threatening

As such, it is the expectation that Agencies will:

- Cooperate with public water entities in the development, implementation, and administration of home water assistance programs
- Make available access to a copy of this policy to employees working in the LIHWAP Program

Currently, the ENERGY application provides LIHEAP heating and cooling benefits for 19 Community Action Agencies in 159 counties. In similar fashion, the 19 Community Action Agencies will assist eligible households in completing the required application to receive LIHWAP assistance. Additional EAP system modifications were required and

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have been made to facilitate issuance of LIHWAP-CAA and LIHWAP-ARPA benefits and administration in accordance with federal and state regulation.

101.2 BASIC CONSIDERATIONS

The Georgia LIHWAP program is developed with several basic considerations to ensure that the true intent of the program is achieved. Those considerations include needs to include:

- Provide benefits to the eligible low-income households targeting households with arrearages/past due bills.
- Provide emergency water assistance benefits to low-income households in "at risk of harm" home water related emergencies.
- The household's water supplier must sign the Water Supplier Agreement in order for the household to be eligible for LIHWAP benefit.
- Provide information and referrals to Water Assistance Program recipients to help them access resources related to water.

101.3 Program Requirements

The Low Income Household Water Assistance Program provides financial assistance on behalf of households which meet four requirements:

1. Total gross income at or below 60% of the State Median Income Guidelines for Georgia
2. Be responsible for paying the cost of drinking water or wastewater for the household or can verify a water burden
3. Be US citizens or lawfully admitted immigrant
4. Submitted required documents to verify eligibility

As required by this policy:

- Households may receive only one payment per program year, unless the State deemed a supplemental payment is feasible. This financial assistance will be in the form of payments to public home drinking and wastewater suppliers on behalf of eligible household applicants.
- Households whose water suppliers have not signed a water supplier agreement **will not** be eligible for LIHWAP.

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- The amount of assistance will depend on the projected total annual gross household income and household size.
- Subsidized housing residents whose water costs are included in their rental payment are not eligible for assistance unless the applicant can verify a water burden.
- Renters who live in subsidized housing are eligible for assistance if the applicant can verify a water burden.

Applications are to be taken at accessible locations statewide, and in the homes of those who are homebound and unable to travel to any of the sites.

LIHWAP will open November 15, 2021 in Georgia and will prioritize households that have an arrearage or past due water bill through the remainder of the year. On January 3, 2022, the program will begin serving households that contain seniors 60 years of age and older and households that contain children five years of age and younger. All other households will be eligible to receive LIHWAP assistance beginning February 1, 2022.

Phase	Dates	Priority Group
Phase 1	<i>November 15. through December 31, 2021</i>	Families with past due water bill arrearages
Phase 2	<i>Beginning January 3, 2022</i>	Families with past due water bill arrearages Household with elderly (60 years of age and older) members, or with children five years of age and younger *Candidates do not need to have an arrearage
Phase 3	<i>Beginning Feb. 1, 2022</i>	All other eligible residents

LIHWAP is not an entitlement program. These funds will only be distributed to eligible customers' water suppliers. The water services must go through public pipelines from a vendor that has signed an agreement to participate in LIHWAP.

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Customers can contact their water vendor and request that the supplier sign an agreement with Department of Human Services (DHS) to be eligible to have these funds applied to their account. Unfortunately, families receiving water services from a vendor without a water supplier agreement, will not receive the LIHWAP benefit.

Vendors interested in participating in LIHWAP can contact their local Community Action Agency or may send an email inquiry to DHS at liheap-csbg-lihwap@dhs.ga.gov or by calling 404-657-3426.

101.4 PROGRAM COMPONENTS

APPLICATIONS

Agencies will utilize the following documents for the LIHWAP intake appointment. Agencies will use form 6000c for all water applications.

The following forms are used to complete a water application:

- Intake/ Appointment Log
- Application form 6000c (green form)
- Income Worksheet Form 6003
- Citizenship Affidavit
- Verification Checklist Form 6009
- Declaration of Zero Income Statement Form 6021
- Authorization to Release of Information Form 6022
- Copy of most recent drinking water or wastewater bill
- Social Security cards for all members in the household
- Photo ID for applicant

BENEFIT AMOUNT

If the household has an arrearage/past due bill the program will pay the entire arrearage/past due amount **and** provide either a \$200 or \$300 towards the current water bill. Payments can only be issued directly to the household's water supplier. Payments **cannot** be made to individuals or households. Households may receive a maximum of one water benefit within the same program year. Water applicants are eligible for the crisis standard of promptness (10 calendar days) with appropriate documentation.

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The Agency may approve up to \$3,500 for a total benefit amount. If the total benefit amount is over \$3,500 (including the arrearage and rate reduction), the Agency must send an email to their assigned program manager and request a LIHWAP Waiver. The Agency must provide the following information related to the bill and water leaks when requesting a LIHEAP Waiver:

- Obtain information related to water leaks from the vendor. Inquire if there is currently or if there was previously a water leak associated with the current bill. If a leak occurred, document if the leak has it been repaired.
- If a water leak occurred, ask the vendor if the bill has been adjusted for the leak.

If a leak has not been repaired and/or if the vendor has not adjusted the bill, the Waiver will not be approved. The program manager must review the bill, charges, and other required information to determine if the Waiver is approved. If the LIHWAP Waiver is granted, the Agency must keep a copy of the approved Waiver in the applicant's file.

If the account is closed at the time the payment is received and the payment results in a credit on the account, then a refund must be made payable to the Community Action Agency that issued the payment. All refunds returned to the Community Action Agency must include the applicant's name, address, and the last four digits of the social security number for reference on the check or refund letter. If there is a credit on the account and the applicant moves or terminate services, then the refund must be made payable to the Community Action Agency that issued the payment. Refund payments must not be made to the applicant or household.

FUNDS MANAGEMENT

When applicable, water benefits are made available under Fund Source 04 within the Energy Assistance Program (EAP). Crisis and life-threatening crisis benefits will also be available under Fund Source 04.

Community Action Agencies will reconcile all LIHWAP funds within forty-five (45) calendar days following the end of the water program.

TRANSFER OF FUNDS

LIHWAP benefit funds are not transferable between other program components. All Fund Source 04 funds will remain in Fund Source 04. Funds may be transferred between counties as necessary based on daily monitoring of the Funds Available Reports. Transfers should occur to serve all areas of the local community adequately and fairly.

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STANDARD OF PROMPTNESS

The following timeframes are required for all Water Assistance applications.

Regular Water Assistance

The Community Action Agency (CAA) has 30 calendar days from the date of the application to mail the benefit to the water vendor. Regular water assistance is defined as the household having current, active public water service. The household must meet basic eligibility.

Crisis Water Assistance

- The CAA has up to 10 calendar days to pay crisis water payments. The Crisis component can be used to pay deposits and reconnect fees. If the water payment will not fully resolve the crisis (i.e., reconnect services or prevent disconnection), the application cannot be approved until the applicant can provide verification of additional funds to resolve the crisis. Households with Prepaid or Pay-As-You-Go water services must be treated as crisis, regardless of the balance on the account. Include the time, date, and documentation of how much is due to resolve the crisis.
- To ensure accurate data collection for the Federal Performance Measures, all crisis water applications must collect additional crisis information. Intake workers must place a “2” in box 25, Water Crisis Authorization Code, on the EAP application to indicate “Prevention of loss of water service” or a “3” to indicate “Restoration of water service”.

Bundled Bills

Statutory language authorizing and appropriating funds for LIHWAP specifies that assistance to households must be paid to public water utilities for household arrearages and rate reductions related to charges for water and wastewater services.

- If a utility vendor provides multiple services, grant recipients may only make payments for fees associated with water and/or wastewater portions of the bill. This could include payment of standard reconnection fees, charges, and penalties related to water and wastewater systems, including stormwater. However, these fees should be standard fees consistent with the existing and ongoing business practices of the water utility (rather than a special fee charged to LIHWAP households).

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- If the utility vendor is unable to itemize the bill and indicate what amount of the bill is for water and/or wastewater services, the CAA should work with the vendor to determine an appropriate percentage of a bill that is attributable to the vendor's cost of providing the water and/or wastewater services. This percentage should be used for all payments made to that vendor.
- If a vendor requires payment for the entirety of an outstanding bundled bill in order to prevent disconnection or re-connect a disconnected household, the CAA should consider options including:
 - CAA may leverage other available resources, such as the Low Income Home Energy Assistance Program, the Emergency Rental Assistance Program, the Community Services Block Grant, or private resources to address additional charges unrelated to water and/or wastewater.
 - CAA may confirm with a household that if the grant recipient pays the water portion of the bill, the household will be able to cover the remaining charges.

RETURN OF FUNDS

LIHWAP subgrantees must report actual obligations for all administrative expenses and repay DHS any funds advanced that have not been used by the end of the LIHWAP application processing period. If client benefits are returned, the matched administrative funding must be returned also.

101.5 Business Requirements

1. Funding type: LIHWAP funds will be designated as benefits for wastewater and/or drinking water arrearages or rate reductions. Rate reductions are payments applied to the client's current water bill. Per federal regulation, LIHWAP payments must go directly to public water vendors on behalf of the household. No LIHWAP payments will be issued directly to the client, therefore 999 is not a valid vendor for LIHWAP payments. LIHWAP benefits may not be used toward the repair or purchase of water related equipment. Program: will only use drinking water and wastewater assistance types for application #20.
2. Vendors: Wastewater and drinking water vendors will need to be added to the system. The current vendor codes are restricted to three digits (123). It is preferred that this is increased to five digits (12345). All LIHWAP vendors will be assigned four-digit vendor codes beginning with 1000 provided by the State Office. The program will need to differentiate between drinking water vendors, wastewater vendors and vendors that provide both drinking and waste water. OIT will create a new LIHWAP DB2 table that will not impact the current vendor file.

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Vendor “fuel” type 9 will be drinking water and vendor “fuel” type 10 will be wastewater. OIT will research the utilization of the existing VSAM files.

3. Payment Type: Payments will need to be recognized as rate reduction (current bill payment) or arrearage (outstanding balance from current month(s)), as well as restoration of services or prevention of disconnection. #26 Payment Type will replace the former #26 Main Heating Source from the energy application. OIT will add an edit to only allow crisis for arrearage. See #25.
4. Restrictions: Each household may receive one (1) water benefit per program year unless the State Office has determined that a supplemental payment is appropriate. Households whose water suppliers have not signed a water supplier agreement **will not** be eligible for LIHWAP.
5. Income Limitations: Households must be at or below 60% of the State Median Income (SMI) issued at the time of that benefit and will remain consistent with regular LIHEAP funding.
6. Seniors/Children/Homebound households: The month of **January** will include those households with arrearages/past due bills and households with seniors aged 60 and over (#15 on EAP), households with children aged 5 and under (#17, 17a) and medically homebound households (#18).
7. Crisis households: Households marked as prevention or restoration will indicate crisis households for reporting purposes. The months of November and December will be reserved for households with arrearages or disconnected (#26).
8. Benefit amounts: The benefit amount for income level II (two) is \$200 and the benefit level amount for income level I (one) is \$300. Rate reduction households will receive the benefit amount indicated on the income table. Arrearage households will receive the exact outstanding amount of the bill plus the rate reduction amount indicated on the income table to be calculated by intake person. OIT will verify that the table amount and the arrearage/bill amount (10a.) equal the total benefit amount #27. Each local Community Action Agency with a payment over \$3,500 must request a waiver from the assigned State Office program manager. Upon approval from the program manager the email notification must be placed in the file.
9. Expenditure reports: LIHWAP funds will require a separate expenditure report to ensure proper tracking and routing. The expenditure report will only feature admin and benefits, not subject to program support.
10. Special message: Program is requesting a message to appear anytime the total benefit amount exceeds \$1,000. The message should state “Please confirm the benefit amount exceeds \$1,000” prior to accepting the application. The application would be accepted once the keyer selects enter again.

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101.6 LOCAL TRAINING

Understanding the recent creation and implementation of the LIHWAP program, DHS will continue to make opportunities available for training to ensure that CAAs may successfully carry out the requirements of the program. Local level training is the responsibility of the CAA, and must be provided to all application intake staff, data entry operators, and other staff responsible for LIHWAP functions.

Local level training must include, at a minimum, the following program topics:

- Policy and procedures of Georgia LIHWAP
- Customer Outreach
- Completion of the LIHWAP Application
- Completion of the LIHWAP Worksheet
- Benefit Fund Allocation
- Benefit Processing
- Access to the EAP Computer System
- Error Correction
- Problem Resolution
- Fair Hearing Procedure

101.7 PROGRAM REPORTING

The following reports are required:

- The LIHWAP Programmatic Report
- Monthly Expenditure Report
- Detailed General Ledger Report
- Other periodic reports (i.e. waiting lists, denials, disaster relief, over-income, etc.)
- Reports must be signed by the CAA authorized representative
- Must be retained at the agency level and available for DHS review

101.8 REPORT USES

DHS and the CAA may use reports for the following purposes:

- To verify program service is provided consistent with policies and procedures
- To identify and correct deficiencies in the program
- Management tool for evaluation and projection of program activities.
- To report on funds expended and balance of funds
- Referrals and invoice for payment

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- Meet Federal and State requirements

101.9 FAIR HEARINGS

The LIHWAP program is subject to current Fair Hearing processes as required.