

2.4 APPLICATION METHODS

AEO allows Subgrantee agencies to accept LIHEAP applications in whichever methods meet their client needs. These can include:

- email
- Fax
- In-Person
- Mail
- Secured drop box
- Telephone
- Web (online)

2.5 OUTREACH & COLLABORATION WITH OTHER RESOURCES

Section 2605(B)(3) and Section 2605(B)(15) ([Assurance 3](#)) of the LIHEAP Statute require Grantees to conduct outreach activities designed to assure that eligible households know about the program. Emphasis for outreach activities will be directed toward those households most vulnerable to energy costs. Specific target groups include households that contain elderly persons, individuals with disabilities (IWD), or young children under age 6.

AEO encourages combination of federal funds (braiding) in order to achieve the best possible benefit for the LIHEAP applicant household. Such leveraging may occur between programs using funds from:

- Community Services Block Grant (CSBG),
- Electricity Exemption Tax - Act 120 Of 1983,
- Weatherization, and
- Other resources not listed

2.6 FISCAL, PAYMENTS, FRAUD, AND APPEALS

2.6.1 Fiscal

AEO has established fiscal control as a process designed to provide assurance regarding the achievement of LIHEAP objectives. Fiscal controls promote effectiveness and efficiency of operations and ensure compliance with State and federal regulations. LIHEAP fiscal policy is intended to build upon general fiscal policies and requirements of the federal government, Community Services Block Grant fiscal policies and Generally Accepted Accounting Principles that will provide the basic guidance to the Subgrantee in its implementation of LIHEAP. Therefore, LIHEAP fiscal policy is limited to requirements unique to LIHEAP.

2.6.2 Fraud

Fraud is an intentional deception, omission, or concealment made for personal gain. 18 U.S.C.A. § 287 states:

Whoever makes or presents to any person or officer in the civil, military, or naval service of the United States, or to any department or agency thereof, any claim upon or against the United States, or any department or agency thereof, knowing such claim to be false, fictitious, or fraudulent, shall be imprisoned not more than five years and shall be subject to a fine in the amount provided in this title.

AEO has established policy to limit and stop fraud activities internally, as well as among the Subgrantees, and the Energy Suppliers.

2.6.3 Appeals

AEO's policy for hearings is based on 42 U.S. Code § 8624(b)(13), also known as LIHEAP Assurance 13, which requires that Grantees (AEO) "provide an opportunity for a fair administrative hearing to individuals whose claims for assistance... are denied or are not acted upon with reasonable promptness."

Based on Assurance 13, AEO acknowledges that the following are reasons that applicants can file an appeal:

- The household is denied for services;
- The benefit amount is less than expected; or
- The benefit is delayed because the Subgrantee did not process the application as quickly as policy requires.

During any phase of the complaint/appeals process, the applicant may designate a representative to assist them. The applicant's written statement, including on the Request for Appeal Hearing form, is enough to choose another person a representative to speak for him/her. Upon request for legal counsel, the applicants must be referred to Legal Aid, Arkansas Legal Services (www.arlegalservices.org), or other resources within the community.

2.7 MONITORING

In accordance with the LIHEAP Statute section 2605(b)(10) of the LIHEAP Statute (42 U.S.C. §8624(b)(10)) the Grantee will periodically audit or monitor the Subgrantee to ensure that federal and State policies and procedures are accurately implemented.

Grantees will make sure that fiscal control and accounting procedures follow Federal standards. This monitoring will check that the federal funds paid to the State for LIHEAP are properly disbursed and accounted for, following the procedures and provisions of chapter 75 of title 31 (commonly known as the "Single Audit Act.")

The monitoring process will:

- Fulfill the requirement of the LIHEAP Federal Block Grant to review the practices of local agencies;
- Protect the applicant's rights;
- Identify programmatic or procedural problems or concerns; and
- Help the Grantee develop guidance specific to the Subgrantee's needs.

2.8 REPORTING

Federal regulations require the collection and reporting of statistical and demographic information to assist in the evaluation of LIHEAP. The data will be used for planning subsequent programs and monitoring the program.

LIHEAP Performance Data, LIHEAP Household Report, Grantee Survey and other reports as required by U.S. Department of Health and Human Services (DHHS) are submitted annually for the evaluation and monitoring of the LIHEAP program.

The information collected for DHHS will be a compilation of data from the fifteen Subgrantees, Utility Suppliers, and other agencies/organizations, as required. The information and data will be submitted to AEO or an Authorized Representative.

The LIHEAP Performance Data will consist of household information entered in authorized software, and energy burden information collected from energy suppliers.

All information will be electronically submitted to AEO.