Discovery Sprint Report

Rhode Island: Low Income Home Energy Assistance Program

Prepared by U.S. Digital Service and The Policy Lab at Brown University

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EXECUTIVE SUMMARY

The Low Income Home Energy Assistance Program (LIHEAP) is a national program to help low-income families, particularly those with the lowest incomes, maintain access to heating and cooling in their homes.

LIHEAP is administered at a Federal level by the Department of Health and Human Services, allocating money to states to help eligible households cover heating and cooling costs. Rhode Island has received approximately $25 million in recent years. The program is overseen by the state’s Department of Human Services (DHS) in partnership with Community Action Program agencies (CAPs) across the state. In federal FY 2019, LIHEAP served approximately 30,000 (7%\(^1\)) of households in Rhode Island.

Approach

In September 2020, a team from the United States Digital Service (USDS) in the US Office of Management and Budget and The Policy Lab at Brown University completed a month-long discovery sprint on LIHEAP in the State of Rhode Island with the following goals:

- Develop an understanding of how LIHEAP operates in one geography
- Build relationships with the people and organizations that make LIHEAP work
- Create a report that can serve as a roadmap for future LIHEAP research and improvements

The team conducted more than 25 total interviews with LIHEAP clients, DHS administrators, employees at all seven Community Action Program agencies (CAPs), software vendors Fulcimus, National Grid, and the George Wiley Center. Due to the coronavirus (COVID-19) pandemic, most of these interviews were conducted remotely over teleconferencing software, though two team members also conducted a set of on-site interviews with DHS, three CAPs, and LIHEAP clients to see the process firsthand.

Themes & recommendations

From our research, the LIHEAP program in Rhode Island serves clients well, provides vital assistance, and is managed astutely by DHS, with dedicated effort from the CAPs. This report

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\(^1\) Out of 410,885 Rhode Island households (est 2014-2018, Census) https://www.census.gov/quickfacts/RI
explores the current state of the program, then offers recommendations for potential improvements grouped into three themes:

1. **Increase client access**

   LIHEAP’s goal is to provide home energy assistance to clients. The first opportunity area recommends changes to improve the ability of both current and potential clients to access LIHEAP:
   - Set a specific *participation goal* for growth
   - Attract new clients: *clearer outreach*, new brand, focus on value
   - *Simplify application* processes with technology
   - Make application materials available in *multiple languages*

2. **Reduce administrative burden**

   In addition to the client-facing services CAPs provide, LIHEAP in Rhode Island requires dedicated administrative personnel at each CAP to administer the program. The second opportunity area focuses on operational improvements:
   - *Adapt CAP intake* processes for the online world
   - Hire *year-round staff* at each CAP to reduce training costs and turnover
   - Improve *data warehouse access to weatherization* program data
   - Provide *assistance for Federal reporting* burden

3. **Proactively address service gaps**

   The LIHEAP program fills an important, yet often *reactive*, role for clients today. The final opportunity area is adopting more proactive policies to prevent crises and improve outcomes for clients:
   - Reduce *client out-of-pocket expenses*, waiting times, and friction
   - Reduce the likelihood of *client crises*
   - Improve *opportunity ladder* for LIHEAP clients
RECOMMENDATIONS

Our interviews and research made it clear that LIHEAP is a valuable program with a positive impact, and that CAPs go to great lengths to ensure that as many eligible residents as possible can benefit from the program. In that spirit, we identified opportunities to further reduce burden and expand reach. If implemented, we believe these recommendations will allow CAP staff to dedicate more time to in-person client support, and reduce unnecessary administrative burden.

1. Increase client access

Each year in Rhode Island, around 30,000 households participate in LIHEAP. That figure represents just 35% of households that may be eligible in the state.

- 96,000 households received SNAP in Rhode Island\(^2\) (rough corollary to households who may qualify for LIHEAP)
- 8,900 households in public housing in Rhode Island\(^3\) (likely no need for LIHEAP)

87,100 Potential LIHEAP audience in Rhode Island

29,756 Actual Rhode Island LIHEAP households in 2019\(^4\)

\(~35\%\) LIHEAP coverage of potentially eligible households in Rhode Island

RI DHS has a stated goal to increase participation in LIHEAP and has hired a new outreach coordinator to work across CAPs. Realizing this goal remains a challenge, as household participation in LIHEAP has remained flat around 29,000 over the last 5 years.\(^5\) To help close this gap, we recommend the following actions:


\(^4\) RIDHS

\(^5\) Data from Rhode Island DHS, 2015-2020 LIHEAP seasons
Set a specific participation goal for growth

Each year, the state could set a specific goal for participation increase in each season in order to track progress toward enrolling more eligible households. This goal should be set in consultation with CAPs and other community partners. Creating buy-in with these organizations will help build the coalition required to achieve target enrollment.

Attract new clients: Clearer outreach, new brand, focus on value

DHS should adjust its approach with a new brand, messaging focused on user value, and clear calls to action in executions.

New, consistent brand for the program to increase clarity, decrease stigma

Today, various, divergent copy and branding is used to increase program awareness (see Appendix B for examples). Such variation can cause confusion among potential LIHEAP recipients. The confusion was clear in some of our interviews, when renewal clients struggled to succinctly explain the program and no two used the same name to describe it. Brand confusion may be contributing to the challenges in acquiring new clients; therefore, we recommend investing in a new brand to be used consistently across the state.

Notably, we recommend removing the phrase “low income” from most client-facing LIHEAP materials in favor of a benefits-focused brand. Most materials today use the phrase “low income” in some form. Given that income limits for LIHEAP in Rhode Island include clients who do not consider themselves “low income,” using this term could cause qualified clients to assume they do not qualify. This sentiment is reflected in a 2015 Pew Research study, which found that 90% of Americans self-identify as “lower-middle class” or higher. Consequently, CAPs speculate that some clients who qualify for LIHEAP refuse to apply for reasons of stigma and pride. Creating a brand separate from “low income” could lessen the likelihood that LIHEAP evokes this stigma. In the exploration at the end of this section, we use “RI Energy Lift” as a placeholder for a positive, benefits-focused brand.

User research to focus messaging on a clear value proposition

While current outreach materials focus solely on heating bills, our limited interviews suggest that some clients were motivated to apply for LIHEAP for other adjacent benefits: lower utility bills (regardless of heating fuel) and shutoff prevention. Hence, DHS could invest in client

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research to confirm these behavioral patterns to create a messaging guide for CAPs, as well as consistent messaging on DHS-created materials.

**Simplifying call to action with a single web destination and phone number**

Instead of having outreach materials for the entire state, DHS should tailor its material for each CAP to provide contact information for just that jurisdiction. Additionally, a central web link to a mobile-first information page/online application would help reach younger clients who don’t want to use the phone (see next section for details).

Furthermore, to simplify the phone number for clients, DHS should expand its partnership with United Way’s 2-1-1 assistance line to be the official phone number for LIHEAP. Promotions can then all use the 2-1-1 number as a single, clear phone number to call. Its operators could then connect clients to the appropriate CAP agency for LIHEAP assistance.

**Accept applications year-round**

LIHEAP’s heating season runs Oct. 1 - May 1, but the benefits of the program extend year-round. For instance, a benefit that is retained year-round is National Grid’s income-eligible Discount Rate program, which grants a 25% reduction in natural gas and electricity rate from National Grid and payment plans to prevent shutoffs. Additionally, applying for LIHEAP before winter also drastically reduces the time to get Crisis Help for deliverables.

Hence, if DHS and CAPs could allow applications to be submitted year-round, people could access the aforementioned benefits even in the off season. This would also smooth out the annual staffing shortage in October and November by spreading out the workload.

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Case study: DHS 2021 LIHEAP flyer exploration

To illustrate these concepts, we’ve prepared an analysis of the DHS 2021 LIHEAP flyer. You can see the themes identified above reflected in the flyer design.

This sample visual is not meant to be a finished product; more client research is needed to test and hone the approach.

These design concepts also apply to other messaging platforms (Facebook posts, open house PowerPoints, etc).

Figure 10. DHS 2021 LIHEAP flyer exploration.

Simplify application process with technology

The coronavirus (COVID-19) pandemic has disrupted a process that is traditionally high-touch and paper-driven, and presented opportunities to modernize the workflow and improve client access.
Most notably, Fulcimus has developed the Codect Client Portal to provide LIHEAP clients an avenue to submit an online application. Concrete suggestions to improve this process are in the following sections.

**Centralize application submission to one online destination across CAPs**

At the time of writing, Comprehensive Community Action Program (CCAP) in Cranston was the only CAP to utilize the Codect Client Portal. The remaining six CAPs are also scheduled to adopt the portal. The lack of a centralized and unified online application platform among all seven CAPs can provide the following challenges:

1) The state needs to pay Fulcimus for the maintenance of seven separate copies of the same online form

2) The online form may differ for each CAP

3) The data for clients who move between CAP catchments may not be transferable

Instead, DHS could provide a central online application for CAPs (similar to how the state provides a single instance of the Hancock software used for program operations at all CAPs). Behind the scenes, client applications will still be assigned to the appropriate CAP (based on where they reside) to provide support for the client and process the application.

We intentionally omit a discussion on the ideal vendor to host this centralized online platform as our research could not definitively indicate a preference for Fulcimus, Hancock, or an alternative firm. Rather, we simply express the need to choose one such vendor.

**Continue to provide “navigator” services as applications move online**

CAPs provide a vital role as ‘navigators’ for their clients, by acting as guides to a complicated application process. The online application should not change this relationship between client and CAPs Therefore, any developments on the Codect Client Portal or its successor software should concede that the applications cannot be filled out by the clients alone, and should work in conversation with CAPs to maximize their impact.

**Remember documentation year over year for renewals**

Up to 70% of LIHEAP applications for a given season may be renewals, but the renewal application requires the same amount of supplemental documentation as an initial application. The renewal application could be streamlined simply by requiring all CAPs to retain copies of documents that do not require updating (e.g. birth certificates, Social Security cards).
Ultimately, the renewal application will become increasingly streamlined as larger subsets of the LIHEAP workflow move from paper to online.

**Automatically import utility bill history from National Grid**

Today, CAPs can look up client accounts in National Grid manually for verification of shutoff and account balances. To reduce the documentation that clients must submit, this utility data can be automated: for customers on Utility sources of heat (natural gas or electric), the online application should integrate with National Grid’s system to import the client’s latest bill.

**Make materials available in more languages**

While CAPs provide instruction packets in multiple languages, the standard application form is only available in English. This language barrier is an impediment to access and increases the amount of help prospective clients need at CAPs. Instead, the state should proactively take part in translating the program application into multiple languages that match demand across the state, such as Spanish, Portuguese, Cape Verdean Creole, etc.

**Consider merging applications/processes across benefit programs**

Having more programs available through a smaller number of application systems (e.g. across SNAP, Medicaid, Unemployment, LIHEAP, WIC) may make it easier for clients to consider and participate in more programs, particularly as redundant supporting documentation can be reused and/or obviated by a single application.

For instance, income verification is a component of applying for each safety net program, but today clients must separately provide pay stub copies for each application. A uniform application/process could reuse the same pay stub copy for multiple programs. This idea requires more follow-up research on benefits to clients and the state (see *Future areas of inquiry*).

**2. Reduce administrative burden**

In addition to the client-facing services CAPs provide, LIHEAP in Rhode Island requires dedicated administrative personnel at each CAP to administer the program. There are several places where time spent on burdensome administrative tasks can be reduced with technology.
Adapt CAP intake processes for the online world

Today's process for handling LIHEAP applications is designed around paper; it should shift to a technology-driven application flow.

Figure 11: Visualization of current process for entering client information into Hancock, based on interviews with CAPs (varies slightly by CAP)
Make online the default point of data entry into the process

As progress is made on the first recommendation to enable more clients to access a centralized online application, similar investment should be made in making this online application the chief mechanism of data import and document storage.

Some clients will choose to use the online application themselves, but clients who come in to the office in person for a consultation can have their intake agent help them fill out the online rather than paper form.

As with the prior recommendation to have a central online platform for application submission, we intentionally do not indicate a specific vendor here because there are pros and cons to each option and that depth of evaluation is beyond the scope of this analysis.

Eliminate double entry of LIHEAP application data

If a client submits their application via the Codect online form, the current process is to print out their application and re-enter it into Hancock. This has the benefit of letting CAPs continue to use the paper process they are accustomed to. However, it also creates manual, tedious data entry and the potential for human error.

The same data should not be entered twice into two different systems. Either the system that takes an online application from a client should automatically import into Hancock, or an online portal from Hancock should be used.

Use technology to automate LIHEAP processes inside CAPs

Adapting the online application as the default invites further opportunities to automate much of the administrative processes within CAPs. This change would enable CAP staff to focus on higher-value work (e.g. interaction with clients, QA, fraud prevention) instead of on menial or automatable tasks.

Hire year-round staff at each CAP to reduce training costs and turnover

DHS provides a budget for CAP employees to administer LIHEAP, but does not specify whether these LIHEAP staff should be seasonal or year-round. As a result, some CAPs request year-round staff positions while others only use seasonal staff. However, to reduce turnover (and avoid the subsequent training costs that DHS incurs as new employees are brought up to speed each season), we recommend that DHS’s LIHEAP manual be updated to encourage at least one year-round staff position (in addition to the LIHEAP manager) at each CAP. This
would allow CAPs to accept applications year-round and reduce training and onboarding costs.

**Improve data warehouse access to weatherization program information**

DHS and CAPs use the Fulcimus’ Codect data warehouse to get a holistic view of benefits and clients across programs. Fulcimus reported not receiving weatherization data from Hancock in our interviews due to access/permissions issues. Given that weatherization is a substantial part of the LIHEAP program, we recommend that DHS check the data agreements for weatherization to ensure uninterrupted access by the data warehouse.

**Provide assistance for Federal reporting burden**

RI DHS is required to file reports with HHS each year. Unfortunately, these requirements have expanded over time, thereby aggravating the administrative burden on DHS. In particular, the relatively new ‘LIHEAP Performance Measures State Snapshot’ was identified by DHS employees as time-consuming.

Currently, the burden of these reports lies almost entirely on just one individual in the RI DHS office. Therefore, we urge DHS to consider supporting the primary report writer with a part-time data engineer to facilitate the data aggregation and validation process when generating reports. As a longer-term recommendation, the team also recommends further follow-up with HHS on the goals of the reporting to identify ways to lessen the burden while still achieving their goal (see *Future areas of inquiry*).

**3. Proactively address service gaps**

LIHEAP fills critical gaps for energy costs in Rhode Island, but on the whole it is a reactive program. There is opportunity for small but intentional shifts in service delivery to get ahead of common service gaps.

**Reduce client out-of-pocket expenses, waiting periods, and friction**

For both utility and deliverable customers, program tweaks can reduce costs, waiting periods, and friction for clients.

**Ensure National Grid discount rates are applied quickly**

After a new LIHEAP client application is approved, that customer is eligible for reduced rates and the utility shutoff moratoriums. This benefit should be applied as quickly as possible (ideally within the day) to save LIHEAP clients and DHS money through reduced rates.
Currently, the list of beneficiaries for this benefit is updated monthly, but we recommend a more frequent update cadence.

**Deposit National Grid funds into client accounts sooner than January**

Today, grant confirmation letters and funds for utility customers are not processed until January. Our research indicated that the DHS is not beholden to the January timeline when allocating the LIHEAP Enhancement Fund. Therefore, to improve the client experience, DHS should consider removing or relaxing its timeline in distributing National Grid funds to clients.

The authors of this report learned in interviews that DHS is already acting on this recommendation with National Grid; we include this recommendation here to underscore its importance.

**Help clients choose good deliverable vendors**

Today, CAPs refrain from recommending a specific oil vendor for LIHEAP applicants needing oil assistance. While the client should retain their autonomy in the decision-making process, they should also be informed that some oil vendors are more receptive to LIHEAP clients than others. For instance, some vendors offer deliveries on the assurance of a CAP that an application is complete, while others wait to receive a formal application letter (often a week later).  

Given that DHS and CAPs already have some qualitative and quantitative information about the services provided by each vendor, we recommend a rating system to provide better assistance to clients in their selection. Additionally, further metrics could be explored to improve this rating system over time.

The lack of information is particularly consequential for new applicants who are applying for crisis grants. The crisis grant is an emergency fund available for clients that are at risk of running out of fuel. Under such duress, one particular client had chosen a vendor that required an out-of-pocket payment for the oil company’s minimum delivery size while waiting for the LIHEAP grant to be approved. The minimum delivery was so large that the client did not need any more oil the rest of the winter, causing the LIHEAP grant to go unused.

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8 Anecdotally we also heard stories of vendors who required funds to reach their accounts before delivering fuel (two to three weeks). DHS noted that this practice would be contrary to their vendor policies; any vendor violating this policy should be reported to DHS directly or via a CAP.
Had this client been better informed when deciding on a vendor, he/she could have found a vendor that delivered the oil without an out-of-pocket charge as the LIHEAP application was being processed.

**Reduce the likelihood of client crises**

Crisis funding is a critical component of LIHEAP. Responding to emergencies is essential and we believe small adjustments can allow LIHEAP to respond to client needs before they escalate to a crisis. As an example of such a change, the recent DHS adjustment of deliverable crisis grants—from 100 gallons each, up to three times in a season to 150 gallons, twice—reduces emergencies and stress for clients.

**Implement a year-round shutoff moratorium for LIHEAP clients**

Outside of the LIHEAP season, clients are not protected from the Public Utility Commission’s shutoff moratorium for National Grid services. From 2015 through 2017, thousands of LIHEAP clients were shut off each summer. Since then, National Grid has made a concerted effort to reduce shutoffs via more reasonable payment plans and making National Grid advocates available on-site in CAP locations. Those efforts resulted in a drastic reduction in LIHEAP client shutoffs: in both 2018 and 2019, fewer than 400 LIHEAP clients were shut off each summer.

In 2020, due to the coronavirus (COVID-19) pandemic, the Public Utilities Commission implemented a summer shutoff moratorium. Bridging the gap between two LIHEAP winter seasons, it effectively created an 18-month moratorium from November 2019 through April 2021. Consequently, no LIHEAP clients will be shut off in 2020.

Given the detrimental effect a power shutoff has on a client’s food supply, health, and means of communication, DHS should work with the Public Utilities Commission to set up a permanent year-round shutoff moratorium for LIHEAP clients.

**Provide customers with information about LIHEAP prior to shutoff**

National Grid should be required to provide all customers facing a shutoff with DHS-created/approved LIHEAP materials at least 30 days prior to shutting off service. For instance, a DHS flyer advertising LIHEAP could be included in the shutoff notice. The goal of this recommendation is to turn each potential shutoff into an opportunity for a potential client to get the protections of LIHEAP. A new, “low-income” free brand is particularly critical for this channel (see Recommendation 1: Attract new clients).
Improve opportunity ladder for LIHEAP clients

As DHS moves to reduce crisis situations, it should concurrently work towards longer-term solutions such as weatherization and budgeting, to help people no longer need LIHEAP.

Bring the best of Assurance 16 to all LIHEAP users

Assurance 16 is a program of intensive budget counseling, weatherization, and energy education. Today, Rhode Island prioritizes limited funding for this program to clients who exhaust their crisis grants in a given winter. These households clearly need help, and at the same time, this approach is reactive; these households have already gone through multiple crises before they qualify.

While funding is limited, DHS could bring some parts of Assurance 16 to more LIHEAP clients. For example, information on how to set up a budget, how to set a thermostat, and what “normal” energy usage patterns look like.

Adjust prioritization system at each CAP for weatherization support

Weatherization helps LIHEAP clients reduce their energy usage and their effective energy burden (the percentage of their income they spend on home energy). Today, each CAP manages a waitlist of clients for weatherization services on a first-come-first-served basis. However, the order that the clients show up does not always correlate with their level of need. Therefore, we suggest ordering clients based on metrics such as their energy burden as a percentage of income and/or raw energy bill amount.

New National Grid program to ease rate increases as people move off of LIHEAP

Earning a few more dollars in income can disqualify a client from grants, but also increase the customer’s electricity and gas bills by 33% each. National Grid could offer a lesser discount to customers just above the LIHEAP income threshold (60%-80% of SMI).

This problem is acute in 2020, as most LIHEAP clients would have received an additional $600/week in unemployment benefits due to the Cares Act. While this additional funding has ended, the extra income may mean some LIHEAP clients will be unable to renew the program.

FUTURE AREAS OF INQUIRY

In addition to the recommendations above, the discovery sprint also identified several areas worthy of follow-up in future research:
• **Consider merging applications/processes across benefit programs**
Having more programs available through a smaller number of application systems (e.g. across SNAP, Medicaid, Unemployment, LIHEAP, WIC) may make it easier for clients to consider and participate in more programs, particularly as redundant supporting documentation can be reused and/or obviated by a single application. For instance, income verification is a component of applying for each safety net program, but today clients must separately provide pay stub copies for each application. A uniform application/process could reuse the same pay stub copy for multiple programs.

Providing more DHS field office services at CAPs could help create a true one-stop-shop for clients. How would clients benefit? Would CAPs be interested in this change? How would it affect enrollment and state costs?

• **Consider deducting unused benefit from previous seasons**
As the program achieves enrollment goals, there will be downward pressure on grant sizes. One potential area of efficiency may be to adjust utility grants for renewal customers based on their remaining LIHEAP carryover balance with National Grid at the beginning of the season. More study is needed to understand how clients currently consider this balance, the potential impact on energy efficiency incentives, and the overall size of the funds in this state. How would such a change affect clients? How would such a change affect the program budget as more clients are enrolled? Could it be used to fund more weatherization and create a virtuous cycle of further reduced energy spending each year? Research of policies in other states may prove instructive: Massachusetts, for instance, directly pays the balance of each monthly bill to the utility (up to a cap) rather than offering a flat grant.

• **Adapting LIHEAP to climate change**
As Rhode Island experiences warmer summers and more mild winters, DHS should consider increased demand for cooling and potentially adjust funding, branding, and processes to accommodate. What changes are required to the program?

• **LIHEAP client sprint**
While we were able to connect with a small sample of LIHEAP clients, we recommend further study of the LIHEAP experience from a client’s point of view. What is the experience of learning about, signing up, and realizing the benefits of LIHEAP like?

• **Connect with the Ad Council or other branding/outreach resource**
As Rhode Island considers revamping the LIHEAP brand, further study of and
connection to potential partners who may be able to assist with such work (e.g. the Ad Council) would be useful. What resources are available with what expertise?

- **Learn more about Weatherization**
  Weatherization offers a proactive way to ease energy burden, reduce energy use, and potentially reduce ongoing program spending on energy by paying for up-front improvements. How can weatherization programs be improved? For each dollar spent on weatherization, how much energy is saved? How much future energy cost is avoided? How lasting is the impact?

- **Examine Federal block grant apportionment process and earmarks**
  The block grant apportionment process and program earmarks (e.g. no more than 15% of the grant may be spent on weatherization) have a large effect on how many clients can be served, what services can be covered, and how the program functions in each grantee locality. How should the model be updated? Are statutory or regulatory changes required?

- **Cost-benefit analysis of HHS reporting**
  Some of the newer required reports from HHS added burden to grantees, but more research is needed to examine the benefits and use of the reporting. Does the benefit of the report outweigh the burden it creates? How can HHS ease the burden?

**REFERENCE MATERIAL**

- "LIHEAP: Program and Funding", Libby Perl, Specialist in Housing Policy, Congressional Research Service, Federation of American Scientists, June 22, 2018
- 42 U.S. Code SUBCHAPTER II—LOW-INCOME HOME ENERGY ASSISTANCE
- 45 C.F.R. part 96
- LIHEAP Performance Management data warehouse
- RI HEAP 2021 Low Income Guidelines (http://www.dhs.ri.gov/Programs/LowIncomeGuidelines.php)
APPENDIX

Appendix A: What is LIHEAP?

The Low Income Home Energy Assistance Program (LIHEAP) is a Federal program designed to keep families safe and healthy through assistance in three areas:

- Home energy bills for heating and cooling
- A financial crisis that could result in the termination of home heating or cooling
- Home weatherization

To qualify for LIHEAP assistance federal guidelines require that recipients must be at or below 150% of federal poverty guidelines or 60% of their state’s median income\(^9\), whichever is higher\(^10\). In addition, guidelines require more benefits be given to households with greater need, which could include households with lower income, more household members, or with elderly, disabled, or young children\(^11\).

LIHEAP is especially important for clients who rely on electricity for heating and cooling, as electricity shutoffs also disrupt communication devices, medical devices, and refrigeration for food. These consequences can spiral quickly, especially for the most vulnerable households.

Federal authorities

**Title XXVI of the Omnibus Reconciliation Act of 1981\(^{12}\)** created LIHEAP. The program is covered by **42 U.S.C., Subchapter II**, and regulated in accordance with **45 C.F.R. 96**. The program is administered in the federal government by the Administration for Children & Families (ACF) in the Department of Health and Human Services (HHS).

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\(^11\) The amount of benefit received by each level of stratification depends on an annually-updated ‘benefit matrix’, which is updated and maintained by DHS. Refer to document: Low-Income Home Energy Assistance Program (LIHEAP) Rhode Island Grant Amounts Federal Fiscal Year 2020

Federal funding

LIHEAP provides funding via annual block grants to states, tribes, and territories (grantees). Emergency contingency funds are also periodically made available. From federal FY 2001 to FY 2019, 87.4% of LIHEAP funding came from annual block grants.

Determining the size of the block grant for each grantee is a complicated process that is outside the scope of this report. A robust description of that process has been published by the Congressional Research Service (Congressional Research Service and Perl). In brief, the calculation methodology used from FY 2009-2020 includes these three components:

- “New” formula percentages which are calculated based on each state’s proportion of the national home energy expenditures by low-income households
- A “hold-harmless level” to ensure states do not fall below the absolute funding they would have received in a previously used calculation methodology
- A “hold-harmless rate” to ensure a minimum, state-specific share of the total available funds

In federal FY 2019, $3.65 billion of block grant funding was made available to grantees. Of that, 98.4% went to States, with the remainder going to Tribes and Territories.

Once grant amounts are determined by HHS, the grantees have some latitude in determining how it is distributed to eligible households in their jurisdictions. Use of those funds broke down into the following percentages:

![Figure 1. Federal FY 2019 breakdown of National LIHEAP Funds](https://fas.org/sgp/crs/misc/RL33275.pdf)

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13 Ibid, 2
15 Ibid, 2
LIHEAP in Rhode Island

In 2019, the state of Rhode Island had approximately 1 million residents, 132,000 of which were state-income eligible for LIHEAP assistance. From state FY 2001 to FY 2019, LIHEAP funding for the state ranged from a low of $13.3 million in FY 2004 to a high of $40.6 million in FY 2009 with the majority of funding (84.7%) from block grants.

The most recent snapshot of how the funding was used in Rhode Island is provided by the LIHEAP FY2019 State Profile, which is maintained by HHS. Compared to the Federal distribution for the same year (above), Rhode Island spent relatively more on Heating and (in 2019) did not provide Cooling assistance:

![Figure 2. Federal FY 2019 breakdown of Rhode Island's LIHEAP Funds](image)

In the State of Rhode Island, LIHEAP is administered by the state’s Department of Human Services (DHS), in partnership with seven Community Action Partnership Agencies (CAPs). We’ll look at their roles in the process, then follow a client through the application process.
Rhode Island Department of Human Services

DHS’s responsibilities include setting state-wide guidelines for LIHEAP implementation, setting household grant amounts, ensuring adherence to federal guidelines, providing shared technology, and supporting day-to-day LIHEAP operations at CAPs. The LIHEAP team at DHS also works with the state Public Utilities Commission.¹⁶

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Program calendar set by DHS

Figure 4. Timeline of the LIHEAP program calendar as outlined in the Low-Income Home Energy Assistance Program Administration and Procedures Manual.

DHS determines household grant sizes from Federal money

Household grant size depends on income/household size and fuel type. For a family of four in 2021, incomes below $62,048 qualify for assistance; LIHEAP’s income matrix includes many households who may not consider themselves “low income.”
Maximum income threshold (60% of State Median):

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<th></th>
<th>$32,26 5</th>
<th>$42,19 3</th>
<th>$52,12 0</th>
<th>$62,04 8</th>
<th>$71,97 6</th>
<th>$81,90 3</th>
<th>$83,76 5</th>
<th>$85,62 6</th>
</tr>
</thead>
</table>

Figure 5. For the 2020-2021 season, maximum eligible household income to qualify for LIHEAP benefits. Truncated at households of 8 for concision in this report; state defines values up to households of 12, and offers a linear formula beyond that size.

Eligible households then receive a grant depending on their income level at the following breakpoints:

Figure 6. For the 2020-2021 season, Electric and N/Gas recipients receive an extra $350 from the RI LIHEAP Enhancement Fund on top of the regular LIHEAP grants listed above.

The grant matrix is published prior to each LIHEAP Heating Season and involves some measure of art and science. The goal is to spend as much of the grant as possible, though before the season it’s unknown how many clients will apply. Federal statute allows up to 10% of a year’s grant to be deferred to the next year; DHS typically puts 10% away as a buffer immediately.

To choose the grant amounts, DHS combines any buffer left unobligated from the previous year (or otherwise recovered from an obligation, such as unspent oil vendor funds) with the current grant. They then look at estimated energy burden—oil prices and utility rates—and combine it with heating efficiency data from the Department of Energy on the cost to heat an
average home with a given fuel. Finally, they factor in expected enrollment to arrive at a grant amount.

If the funds run out before the end of winter, the contingency plan is to curtail LIHEAP applications prior to the end of the winter. For the past several years, estimation work has greatly improved, allowing the state to accept regular and crisis grants all the way through their planned end of the LIHEAP season on May 1.

LIHEAP enhancement fund

Since 2011, Rhode Island has supplemented federal funding with a LIHEAP Enhancement Fund. Created as part of the Henry Shelton Act17 in the Rhode Island General Assembly, each National Grid customer pays a flat fee set by the Public Utilities Commission. As of October 2020, this charge was set at $0.80 per month (capped at $10 annually by statute). The Department of Human Services uses this money to supplement grants to Utility customers; the department selects the enhancement grant amount at the same time as the Federal grant amounts. For the 2020-2021 winter season, the Enhancement grant was set at $350 on top of the Federal grant amounts.

RI DHS reports back to HHS

HHS requires reporting on how the grants are being spent. An annual Carryover and Reallotment report is due from each state by Aug. 1 through an HHS online portal. In recent years, the HHS Administration of Children and Families (ACF)’s Office of Community Service (OCS) Program Integrity Office has required an Energy Burden report, showing how a LIHEAP grantee’s spending is alleviating energy costs as a percentage of income for clients to ensure those with the highest-burden receive relief.

Technology platforms provided by DHS

To operationalize the program, DHS uses Hancock Software’s18 LIHEAP Online tool. It is the system of record for LIHEAP recipient information, payment tracking, cutting checks to vendors, and generating reports to HHS. After DHS sets the grant matrix for the season, it is loaded into Hancock’s software to be applied automatically for approved grants; CAPs do not have to calculate grant amounts by hand.

Additionally, CAPs use a system from Fulcimus, LLC called Codect. Codect is a data warehouse that centralizes data about multiple programs that CAPs manage, including LIHEAP. It is primarily used to administer and report on Community Services Block Grant programs, though CAPs can use it for various CRM-like scenarios, e.g. to determine all the programs a client enrolled in.

Early this year, Fulcimus created an online LIHEAP application program called The Codect Client Portal after a discussion with staff at the CCAP in Cranston. The application is currently rolled out at https://apply.comcap.org (on CCAP’s website). Other CAPs are evaluating this application and are expected to roll it out on their own websites in the coming months.

Community Action Partnership Agencies (CAPs)

While DHS oversees the program, the LIHEAP program is operationalized by seven non-profit Community Action Agencies known in Rhode Island as Community Action Program agencies (CAPs), to deliver benefits to households. These agencies were created as part of the 1964 Economic Opportunity Act to help administer programs related to the War on Poverty, including the Temporary Assistance for Needy Families cash-assistance program and the Head Start preschool program.

For LIHEAP in Rhode Island, CAP agency responsibilities include outreach, applications, renewals, crisis response, weatherization, and payments to LIHEAP recipients, utilities, and vendors. For organizational design reasons, the home energy bill support and crisis response portions of LIHEAP are managed separately from home weatherization in both DHS and CAPs.
Service areas

Each CAP is assigned a non-overlapping catchment area in the state. There are nine catchment areas; two CAPs manage two areas each.

<table>
<thead>
<tr>
<th>CAP Agency</th>
<th>Catchment / Communities Served</th>
</tr>
</thead>
<tbody>
<tr>
<td>Blackstone Valley Community Action Program</td>
<td>Pawtucket, Central Falls, Lincoln, Cumberland, Woonsocket</td>
</tr>
<tr>
<td>Community Action Partnership of Providence</td>
<td>Providence</td>
</tr>
<tr>
<td>Community Care Alliance</td>
<td>Woonsocket</td>
</tr>
<tr>
<td>Comprehensive Community Action</td>
<td>Cranston, Foster, Scituate, Coventry</td>
</tr>
<tr>
<td>Eastbay Community Action - Lower Bay Region</td>
<td>Newport, Portsmouth, Tiverton, Middletown, Jamestown, Little Compton</td>
</tr>
<tr>
<td>Eastbay Community Action - Upper Bay Region</td>
<td>East Providence, Warren, Bristol, Barrington</td>
</tr>
<tr>
<td>Tri-County Community Action Agency - Northern Region</td>
<td>North Providence, Johnston, North Smithfield, Smithfield, Burrillville, Gloucester</td>
</tr>
</tbody>
</table>
Navigating LIHEAP in Rhode Island as a client

The client will receive support in one of two ways: either with Deliverables or via Utility:

- **Deliverable** - The fuel is delivered to a client’s house. The fuel is typically home heating oil, though a small number of customers are on coal or wood furnaces. “Deliverable” fuel is usually paid up-front prior to delivery. There are hundreds of deliverable vendors in the state.

- **Utility** - Refers to both electricity and gas service. National Grid is the primary provider for most households in Rhode Island.

![Figure 9. 2019-2020 winter season heat sources for LIHEAP-served Households in Rhode Island. Numbers don’t add to 100% due to rounding. Source: DHS](image)

**Step 1: Learn about LIHEAP**

The CAPS are in charge of outreach for their respective jurisdiction. Similarly, our research indicates that most clients are introduced to the program through word of mouth from family (typically not from friends due to stigma about being “low-income”) or through referrals from other program offices (e.g. DHS Field Office for SNAP). Additionally, CAPs also hold open houses, visit farmer’s markets and other community events, and hang flyers in public buildings like schools or libraries.
CAPs told us they do very little referral via the other programs they offer—LIHEAP is more likely to have brought a new client into the CAP in the first place than any other CAP-administered program. Instead, LIHEAP drives discovery of other CAP programs.

In 2020, DHS hired an outreach coordinator to improve LIHEAP awareness across CAPs.

**Step 2: Apply via a CAP**

First-time applicants to LIHEAP typically call or visit the CAP for personalized assistance. The application process for LIHEAP requires applicants to fill out a standard double-sided paper application from DHS (Appendix B). Alternatively, the Codect Client Portal allows this form to be filled out online, but the same information is required.

To supplement the LIHEAP application itself, applicants must provide supporting documentation for themselves and each member of their household, such as:

- Social Security Card for the applicant and each household member
- Valid Photo ID Government-issued, non-expired for the applicant and each household member. Birth certificates are acceptable for minors.
- Previous energy bill, e.g Gas/Electric utility bill, Oil fill receipt
- Proof of housing: Lease Agreement, Subsidized Lease, Mortgage, Tax Bill, a “Landlord Form”,
- Income documentation for the applicant and household members
  - If the applicant is employed: Four consecutive weeks of pay stubs, all award letters from public assistance programs (SNAP, SSI, Unemployment, Private Pensions, Court Ordered Child Support, Support Income etc.)
  - If the applicant is an adult with no income: Declaration of No Income
  - If the applicant is self-employed: Declaration of Self Employment and recent Federal Tax returns.

The Codect Client Portal allows applicants to upload photos of their documents using their phones. The paper form, on the other hand, requires applicants to attach a hard copy of each document. This paper copy requirement often creates a burden on the applicants as the CAPs generally do not provide copy services.
Step 3: Get approved and await the start of assistance

During the LIHEAP season, the CAPs are able to process most applications within two weeks. Applications submitted prior to Oct. 1 are typically held until the season begins. Some CAPs offer low-income verification. For our client in winter, this summer processing is not a consideration, though we address improving access to discounts in summer in the Accept applications year-round recommendation.

The delivery of the requested heating assistance is accomplished in one of two ways:

Costs and timing for Deliverables: Home Heating Oil

- Application submitted
- Two-to-three weeks later, a letter arrives confirming the applicant’s grant amount based on income.
  - Sometimes a CAP can get the oil vendor to deliver in the meantime
  - If you need your system primed or oil in the meantime, you need to pay for this out of pocket
- If a client’s grant runs out during the season, they are eligible for the LIHEAP crisis grant - a supplementary assistance of 150 gallons twice annually
- Enrolling in LIHEAP for oil also lowers the electricity and gas rates by 25% - 30% going forward as part of National Grid’s income-eligible Discount Rate program. LIHEAP participants are also protected from National Grid service shutoff during an annual winter shutoff moratorium, each November to April.
- At the end of the season, any money left over from the grant will be reclaimed by your CAP to return to DHS. Not all oil vendors cooperate with this reclaim process.

<table>
<thead>
<tr>
<th>Potential service gaps: Deliverables</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential time until your service is restored by LIHEAP</td>
</tr>
</tbody>
</table>
Potential out-of-pocket expenses between application and service restoration

<table>
<thead>
<tr>
<th></th>
<th>Over $100 (for priming, minimum oil delivery from your oil vendor)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Potential out-of-pocket expenses for energy while awaiting LIHEAP fund deposit</td>
<td>n/a — Service won’t restart until money is available, there’s no further delay after funds are available</td>
</tr>
</tbody>
</table>

Utilities: Natural Gas

While this example is for natural gas, the process is similar for Electricity customers:

- Application submitted
- CAP approves application (typically same day in a shutoff scenario)
  - The client is responsible for calling National Grid to set up service reconnection and a payment plan (LIHEAP typically pays 25% of the balance on the account for the restart).
- Enrolling in LIHEAP for natural gas lowers your gas and electricity rates by 25% - 30% going forward as part of National Grid’s income-eligible Discount Rate program. LIHEAP participants are also protected from National Grid service shutoff during an annual winter shutoff moratorium, each November to April.
- In January a letter is generated letting you know the grant amount. In January and February, the LIHEAP grant (federal and enhancement funds) appears on your account (specific to your heating fuel type)
- The remainder of the grant that is not used during the season is not collected.

Potential service gaps: Utilities

| Potential time until your service is restored by LIHEAP | 24 - 72 hours, primarily depending on how quickly the client calls National Grid and when reconnect crews are available. |
Potential out-of-pocket expenses between application and service restoration

Minimal.

Potential out-of-pocket expenses for energy while awaiting LIHEAP fund deposit

Over $100, depending on your payment plan terms and the date. LIHEAP funds typically don’t appear in National Grid customer accounts until January and February, regardless of application timing.

Step 4: Renewals

Approximately 70% of LIHEAP applications are processed as renewals each year. Similar to an initial application, renewal applications also require supplementary documentation, though some CAPs do facilitate the process by maintaining a master file on some of the documents (e.g. Social Security card copies).

CAPs generally mail out renewal forms in August and September for the upcoming season (prioritizing Deliverable applications first). Many clients still require in-person interaction with a CAP to renew: for instance, at the Community Action Partnership of Providence in 2018-2019, less than 30% of renewal applications were returned by the client via the mail. The rest of the clients came in person to the CAP either to get the paperwork double-checked and use the application dropoff box inside the building (64%) or to do a full interview with a Benefits Eligibility Specialist (6%).

19 Community Action Partnership of Providence internal data for 2018-2019 season. 2,540 new out of 8,398 total applications
Appendix B: Outreach Materials

Summer’s short.
Worried about upcoming energy bills?

The Low Income Home Energy Assistance Program can help!

We can assist eligible participants with heating costs during the cold weather months.

Call Tri-County Community Action at (401) 519-1913 to be placed on a notification list. We will contact you when applications are available in early Fall.

Could you or someone you know benefit from help with heating expenses?
Tri-County Community Action Agency is here for you!

<table>
<thead>
<tr>
<th>Household Size</th>
<th>Annual Income Limit</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>$32,265</td>
</tr>
<tr>
<td>2</td>
<td>$42,193</td>
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<td>3</td>
<td>$52,120</td>
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<tr>
<td>4</td>
<td>$62,048</td>
</tr>
<tr>
<td>5</td>
<td>$71,976</td>
</tr>
</tbody>
</table>

We offer Heating Assistance and Weatherization Services!
For additional needs, information or to schedule an appointment, contact us 401-519-1913 (NP site), 401-351-2750 X 2337 (NK site) or 401-604-0098 (Westerly site).

Having trouble paying your heating bill?

Our Low-Income Home Energy Assistance Program Could Help

LIHEAP helps eligible low-income families pay their heating bills and offers weatherization services.

Learn More & Apply at Your Local Community Action Program Agency

Blackstone Valley CAP
51 School Avenue, Pawtucket
401-723-9227

CAP of Providence
320 Hope Street, Providence
401-521-3235

Community Care Alliance
245 Main Street, Westerly
401-524-6064

Comprehensive Community Action
111 Dorrance Street, Cranston
401-451-5213

East Bay Community Action
19 Broadway, Newport
401-444-7821

East Bay Community Action
126 Baldpate Point Avenue, Riverhead
401-441-3000

Tri-County Community Action Agency
111 Eurek Street, North Providence
401-301-2750

Tri-County Community Action Agency
415 Tower Hill Road, North Kingston
401-301-2750

West Bay Community Action Partners
407 Jefferson Blvd., Wakefield
401-372-8600
Appendix C: Names for LIHEAP in Rhode Island

Sourced from CAP interviews, client interviews, and observations

- LIHEAP
- RIHEAP
- Heating Assistance
- Oil Assistance
- CAP
- Ayuda
- Assistance

Appendix D: Required Documentation to apply for LIHEAP

Primary applicant must provide:

- Social Security Card;
● Valid Photo ID (Government issued ID & cannot be expired);
● Gas and/or Electric Bill, Oil or Propane Gas Ticket from Utility Company;
● Lease Agreement, Subsidized Lease, Mortgage or Tax Bill, LANDLORD FORM, Tax Bill if you don’t pay mortgage;
● Signed RI-LIHEAP Application
● Income documentation:
  ○ Must include four consecutive weeks of paystubs or all award letters from public assistance programs (SNAP, SSI, Unemployment, Private Pensions, Court Ordered Child Support, Support Income etc.)
  ○ Adult with no income? Must fill out a Declaration
  ○ Self-employed? Must fill out a declaration and include recent Federal Tax returns.

Each Household Members (All adults and children that reside in the household) must provide:
● Social Security Cards for all household members;
● Valid Photo ID for household members over the age of 18; birth certificates for minors;
● Income documentation:
  ○ Must include 4 consecutive weeks of paystubs or all award letters from public assistance programs (SNAP, SSI, Unemployment, Private Pensions, Court Ordered Child Support, Support Income, etc.)
  ○ Adult with no income? Must fill out a Declaration
  ○ Self-employed? Must fill out a declaration and include recent Federal Tax returns.

Additional forms that may apply:
● Landlord Information Form
● Declaration of Other Income Form
● Support Letter Form
First Appeal Request Form

Rental Income Form

National Grid - Handicapped and Serious Illness Protection Form (if applicable)

Appendix E: Glossary

- **RIHEAP, LIHEAP, RI-LIHEAP, HEAP**: a grant to assist a household in meeting heating costs. The grant may be paid to either a heating fuel vendor or utility company, or in a few cases, directly to the applicant.\(^{20}\)

- **Crisis assistance**: a grant to help qualified households resolve a home heating crisis caused by heat shut-off due to failure to pay a regulated energy bill, the inability of a household to pay for deliverable fuel, or the failure of a heating system that is not repairable\(^{21}\).

- **Weatherization Assistance Program (WAP)**: helps income-eligible households reduce heating bills by providing whole house energy efficiency services to households that qualify for LIHEAP. Some services available include installing insulation and providing health and safety measures including: installing smoke and carbon monoxide detectors, reducing drafts, and providing proper ventilation.\(^{22}\) WAP is administered by CAPs.

- **Assurance 16**: a program designed to help LIHEAP clients who have experienced crisis situations avoid them in the future by providing energy education, financial counseling, vendor negotiations, and needs assessments and referrals.

- **Deliverable**: Fuel delivered to a client’s house for heating. Typically, home heating oil, though a small number of customers are on coal or wood furnaces. This kind of fuel usually must be paid for up-front before the vendor will deliver the fuel. There are hundreds of deliverable vendors in the state.

- **Utility**: Electricity and gas service. In Rhode Island, utility consolidation means that there is a single vendor for both utility services in Rhode Island: National Grid.

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- **Community Action Program (CAP):** Local community centers that provide wrap-around services for the economically disadvantaged and elderly. These agencies were created as part of the 1964 Economic Opportunity Act to help administer programs related to the War on Poverty, including the Temporary Assistance for Needy Families cash-assistance program and the Head Start preschool program. (Refer to footnote for the full list of CAPs in Rhode Island, and the neighborhoods they serve.)

- **Community Action Association (CAA):** a network of community action agencies (CAAs) serving all 39 cities and towns in Rhode Island

- **RIDHS:** Rhode Island Department of Human Services

- **HHS:** United States Department of Health & Human Services

- **LIHEAP Enhancement Fund:** a fund collected by National Grid under Rhode Island state law. Managed by the Public Utility Commission and spent by the Department of Human Services to supplement Federal LIHEAP funds for utilities. By statute, each utility customer in the state is charged up to $10 per year. These funds are used to augment grant sizes for electricity and gas.

- **Good Neighbor Energy Fund:** [http://rigoodneighbor.net/needassistance.htm](http://rigoodneighbor.net/needassistance.htm)

- **Fulcimus LLC:** a small organization (currently 3 people) that has been working with CAP agencies in Rhode Island primarily through their data product, Codect. Although Fulcimus’ traditional responsibilities are peripheral to the operations of LIHEAP (refer to Codect below), they are seeking to increase their domain by creating the online intake form that is being rolled out to CAPs in FY 2020.

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28 These conclusions are the team’s interpretations based on interviews conducted with Theodore Stocker, Managing Partner at Fulcimus LLC.
- **Codect**: Fulcimus’ primary data product. Codect is a centralized data warehousing software that gathers information about clients from various agencies. Hence, the software can help CAPs and DHS identify other services that a client may be enrolled in. The CAPs only use Codect for reporting purposes, and do not use Codect to determine LIHEAP eligibility.\(^{29}\)

- **Hancock**: Current provider of the primary administrative software for LIHEAP. Refer to section “Technology platforms provided by DHS” for further detail.

\(^{29}\) These observations are based on in person interviews conduct on-site at Providence CAP and Fulcimus’ website (https://www.fulcimus.com/)