Thank you for your participation and feedback on the LIHEAP/CSBG webinar. We would like to collaborate together in developing the new “normal” in terms of providing services safely and effectively.

Also of note, several utility providers have contacted us to ask if there is anything they can do to help. As you think about the new exceptions we discussed and develop a plan, you may want to let your vendors know how and when their customers can apply. They could share that information with their customers. As you know, we are about to begin our final month of the Heating season. We would encourage you to prioritize applications from natural gas and propane households as the vendors begin lifting their waiver on disconnections in the upcoming weeks.

The following are answers to the questions entered in the chat box during the webinar as well as those questions that were emailed to us.

1. **We are getting a number of requests to assist with mortgages. Will there be a temporary change in the mortgage provision?**
   
   At this time, there will not be a change in the mortgage provision. In our communication with OCS, it was pointed out that the CSBG Act Section 678F (a) “… grants made under this subtitle (other than amounts reserved under section 674(b)(3) may not be used by the State, or by any other person with which the State makes arrangements to carry out the purpose of this subtitle, for the purchase or improvement of land, or the purchase, construction, or permanent improvement (other than low-cost residential weatherization or other energy-related home repairs) of any building or other facility.”

   The language that has called the interpretation into question is the portion that says “(other than low-cost residential weatherization or other energy-related home repairs).” The state and sub-recipients would not have a residence or home, so it implies that this extends to clients of the state or sub-recipient.

   If an auditor had a questioned cost associated with mortgage assistance, it could result in disallowed costs.

2. **Am I correct that infrastructure changes to our facilities is an approved expense?**
   
   It depends on the type of changes.
3. **Modifications to include service windows, etc.?**
   Modifications to include service windows for the protection of agency staff would be allowable.

4. **Are we permitted to pay our employees Hazard Pay for the risk that they will encounter being in direct contact with the public?**
   This would be based on the agency’s policy.

5. **Will retrofitting an existing building be an allowable expense in order to ensure we have appropriate social distancing-for example-wall partitions, etc.**
   As long as the retro-fitting does not fall under the limitations in the CSBG Act. If in doubt, please contact us.

6. **Do you know of any community level initiatives that are being planned/conducted across the network, specifically with the new CARES funds?**
   There have been no community-level initiatives entered in FACSPro at this point.

7. **Due to social distancing, can signature on applications be waived if we have documentation?**
   Because the application contains language that the client is certifying the information they have provided is true and correct and they are giving permission for the agency to contact outside sources when necessary, we cannot waive the signature requirement. However, please refer to our electronic signature guidelines to develop alternatives that can work for your agency.

8. **Does the State have resources to purchase PPE? We are having trouble ordering cleaning supplies, masks, gloves, etc.**

9. **Because we also use CSBG for direct aid, rent, deposits for reconnect of utilities etc., can signatures also be waived with documentation on those?**
   CSBG will follow the same exceptions as LIHEAP. Because the application contains language that the client is certifying the information they have provided is true and correct and they are giving permission for the agency to contact outside sources when necessary, we cannot waive the signature requirement. However, please refer to our electronic signature guidelines to develop alternatives that can work for your agency.

10. **Will we need to provide proof of income for a child that is 18 years of age?**
    Proof of gross earned and unearned income received the prior month is required for all current household members, with the exception of earned income for household members under 18. So yes, proof of income is required for a child that is 18 or older. If they have no
income, the applicant can complete the new Declaration of Household Income form and enter zero income for that person.

11. Your Crisis stated 18 and under, but will we have to show proof of income for 18 year olds or if they are still enrolled in high school?
Proof of income is required for all household members 18 and older. If they have no income, the applicant can complete the new Declaration of Household Income form and enter zero income for that person. They do not have to provide proof they are enrolled in high school.

12. Recently expired or expired last year.
Regarding the LIHEAP exception of accepting expired photo ID’s, it does not matter when it expired. We recommend not accepting any ID that is more than three years old.

13. If we cannot print the screen shot from a cell phone on income can we just document it on the LIHEAP application?
For income and the other requirements to determine eligibility, documentation that can be maintained in the file is necessary. Possible solutions might be for the applicant to email or text the information to the agency so it can be printed. If the applicant does not have a data plan, the agency could set up a guest WiFi password that changes daily. For documentation that is not required, the agency has the discretion to visually verify it.

14. We are going to have several clients coming in with huge bills that could cover a couple of months. Will this be considered an old bill?
If the client provides their most recent bill or you contact the vendor to ask about the current balance, it will not be considered an “old bill” if their balance includes charges from the past few months.

15. Will the guidelines for LIHEAP be acceptable for CSBG?
Yes, the LIHEAP exceptions discussed on the webinar will also be acceptable for CSBG.

16. If crisis is shifting to help more households, why exclude single households?
The new LIHEAP Crisis definition is adding to the definition we have always used, not replacing the definition. A single-person household would still be eligible for Crisis assistance if they meet the income guidelines and:
- are experiencing an energy-related crisis in which their health or well-being could be endangered if Crisis assistance is not provided.
- Or they were impacted by a State- or Federally-declared disaster or emergency such as the coronavirus (lost their job or lost wages due to reduced work hours).

17. Can you provide a sample copy of the written policy for obtaining electronic signatures.
We don’t have a sample policy, because each agency is different and will find different ways to use electronic signatures. At a minimum, each policy must describe how it will verify the signatory (upload photo ID into an app, email a photo ID, etc.) and how the signature will be
maintained (digital file, printed copy in paper file, etc.). Each agency is encouraged to work with your legal counsel to develop the plan.

18. The electronic signature is great for computer literate clients, but we have clients that aren't and are in the rural areas that do not have internet access. We understand there may be obstacles with processing applications electronically. To provide flexibility for agencies to meet the needs of their clients, we have provided a blank FACSPro application and other documents on our webpage. Agencies have the option to develop an application packet with these documents that the client can pick up or the agency can mail to them.

19. When speaking of the lease are you referring to the utilities allowance? Yes, the lease is typically needed to determine the client’s utility allowance/reimbursement unless you have a print-out from the local housing authority with the amounts.

20. Will CSBG pay for Zoom (technology)? The purchase of technology such as laptops, printers, etc. would be an eligible CSBG expense.

21. How do you keep documentation secure when sent over email? We strongly recommend that you consult with your attorney and an IT specialist. There are many vendors who can train staff on cyber security and help develop safe electronic communications.

22. Are we to spend the regular LIHEAP/CSBG before using the CARES funds? No, the CSBG CARES funding should be spent along with regular CSBG funds. The CSBG FY 20 funds must be expended by December 31, 2020. The CSBG CARES funding must be expended by September 30, 2022. In developing their plans for the CARES funding, the agencies should determine how best to expend all the funding by the ending dates.

23. So the modifications are regular LIHEAP not CARES funds? Yes, the grant modification we are working on is for the FY2020 LIHEAP funding only.

24. If a client has already received LIHEAP Regular and Crisis for this season, can they be helped more than twice each season? The rule for assistance with FY2020 LIHEAP funds has not changed. Eligible households can receive assistance once for Heating, Crisis Heating, Cooling and Crisis Cooling.

25. If an agency has a complete online web and mobile interface for taking all agency applications can this system be used and data imported into FacsPro? We can discuss this with DBA.
26. It has been very difficult to get PPE supplies, will ADECA provide PPE supplies or a resource for supplies to the agencies.
Unfortunately, ADECA does not have the resources to provide PPE supplies. We recommend that you contact the local EMA office and submit a request. Please visit FEMA to see PPE recommendations for non-healthcare settings: https://www.fema.gov/news-release/2020/04/22/coronavirus-covid-19-pandemic-addressing-ppe-needs-non-healthcare-setting

27. Can we purchase new computers for employees in order to work with updated technology? Equipment is old and outdated.
This is an eligible CSBG expense.

28. Customer assistance requires a degree of contact. Does anyone have partnerships with companies who can provide staff safety?
Unfortunately, ADECA does not have the resources to provide PPE supplies. We recommend that you contact the local EMA office and submit a request. Please visit FEMA to see PPE recommendations for non-healthcare settings: https://www.fema.gov/news-release/2020/04/22/coronavirus-covid-19-pandemic-addressing-ppe-needs-non-healthcare-setting

29. Can we require customers wear face coverings?
This would be an agency decision; however, it might be difficult for some clients to obtain them and most agencies will not be able to procure enough to pass them out to visitors. It might be more efficient to have staff wear masks and/or provide physical barriers such as the plexiglass partitions many grocery stores are using.

30. Would you suggest to not have physical paper/files. I'm concerned about the paperwork spreading the virus. Staff safety should be a top priority.
If you are concerned about transmitting the virus by handling paper, agencies are encouraged to review materials on the CDC and FEMA websites. Visiting the Alabama health department website is also a good resource. We do not believe anything in our manual or state plan would prevent any agency from developing procedures to go paperless or near-paperless. If you identify an obstacle in our written program requirements, please contact us.

31. Can funds be used for instant ink? This is cheaper than purchasing ink from WalMart or Office Depot.
OMB Uniform Administrative Requirements require that costs “be necessary and reasonable for the performance of the Federal award.” If this is determined, the agency would need to follow their procurement procedures for subscription services.
32. So if they have reg/crisis on regular LIHEAP contract will they be eligible for additional 2 services with CARES?
   CARES Act funding is not currently available for LIHEAP, so no program guidance is available at this time.

33. Emailed question: Can crisis funds be used to pay the entire bill (water, garbage, sewage)?
   LIHEAP is for home heating and cooling only. The last section on page 19 of our manual says: Items on a utility bill not related to home heating and cooling, such as outdoor lights or appliances, are not allowable costs. In addition, meter tampering fines are not allowable costs. Please contact us directly if you have a specific case you need us to review.

34. Emailed question: Do we have to have original signature on all pages of the application? We run 3 pages plus vendor copy. Out of the 3 pages, do we need all to have original signatures or can we just have one signed and copy other pages we need as long as the original signed copy goes to fiscal?
   You can have one application with the original signature and make copies of that for the client and for your files. If you choose to accept paper applications that will have the client’s signature already on it, you can write “Client signature on file” on the FACSPro application and vendor copy.

35. Emailed question: On CSBG, the grant we get for CARES, will that be the total funding from now to 9/30/2022 or will we get a contract each year for CARES until 9/30/2022?
   It is our understanding that the CARES funding will be awarded in one lump sum to the state. The state will issue the grant agreements to the agencies with their entire allocation with an end date of 09/30/2022. The regular CSBG funding would continue being awarded as usual.

36. Emailed question: Can you email us the sample policies for Hazard Pay and Electronic Signatures?
   We recommend that you consult with your legal counsel and human resources contractor or employee. There is some good information on the NASCSP website here: https://nascsp.org/coronavirus-resources/legislative-resources/

37. Emailed question: I did not hear if some exception if any will be made for those households that have received both regular and crisis grant will they be eligible for additional LIHEAP assistance under CARES?
   CARES Act funding is not currently available for LIHEAP, so no program guidance is available at this time.
38. **Emailed question: During the last month of the Heating Program when weather conditions are not extremely cold enough to aggravate or cause medical situations, can a Crisis award be issued because of the State of Emergency?**
The Crisis definition was expanded to include households impacted by a State or Federally-declared disaster or emergency (such as coronavirus) and also include households with children 18 and under. If a household meets the income guidelines and meets either of those criteria, they are eligible for crisis regardless of the weather conditions.

Also, based on the manual, the agency should evaluate each case on its own merit. Consider the age of the household members, whether a household member has an illness or chronic medical condition that may be aggravated without adequate home energy, or other circumstances in which the household member’s health or well-being would likely be endangered if Crisis Assistance is not provided.