



ADMINISTRATION FOR  
**CHILDREN & FAMILIES**

Office of Community Services | 330 C Street, S.W., Washington, DC 20201  
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## Low Income Household Water Assistance Program Information Memorandum

**IM#:** LIHWAP-IM-2022-03  
**DATE:** May 4, 2022  
**TO:** Low Income Household Water Assistance Program Grant Recipients  
**SUBJECT:** Update to FAQs on LIHWAP  
**ATTACHMENT(S):** N/A

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As a follow up to recent Office Hours, the Office of Community Services (OCS) would like to clarify guidance regarding utility vendors that bundle water and wastewater with other bills such as garbage, gas, or electricity. OCS would also like to clarify guidance on properly applying benefits to household accounts and on providing services for tribal members who reside outside of the tribe's jurisdiction.

Statutory language authorizing and appropriating funds for the Low Income Household Water Assistance Program (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. The LIHWAP [Supplemental Terms and Conditions](#) state that grant recipients must "ensure that the owner or operator provides written reconciliation and confirmation on a regular basis that benefits have been credited appropriately to households and their services have been restored on a timely basis or disconnection status has been removed if applicable."

**1. If a utility vendor provides multiple services and bundles the bills, can we pay the entirety of the bill?**

**Answer:** Grant recipients may only make payments for the water and/or wastewater portions of the bill.

**2. What if the utility vendor is unable to itemize the bill and indicate what amount of the bill is for water and/or wastewater charges?**

**Answer:** The grant recipient should work with each vendor separately to determine an appropriate percentage of a bill that is attributable to that vendor's cost of providing the water

and or/wastewater services. This percentage should be used for all payments made on behalf of households to that particular vendor.

**3. What if a vendor requires payment for the entirety of an outstanding bundled bill in order to prevent disconnection or re-connect a disconnected household?**

**Answer:** There are a number of options for grant recipients to consider in their policies and procedures. For example:

- Grant recipients may include provisions in vendor agreements that require that services be restored and/or maintained for a set period of time (e.g., 90 days or more) in exchange for payment of the established portion of the water and/or wastewater bill.
- Grant recipients 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.
- Grant recipients 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.

**4. How can we ensure that the water utility owner or operator provides written reconciliation and confirmation on a regular basis that benefits have been credited appropriately to households and their services have been restored on a timely basis or disconnection status has been removed if applicable?**

**Answer:** OCS recommends written agreement or contracts with water utilities for the protection of all parties. Grant recipients can include language in the agreement or contract establishing a policy whereby the utility owner or operator provides written reconciliation and confirmation on a regular basis that benefits have been credited appropriately and that services have been restored on a timely basis or disconnection status has been removed if applicable.

**5. How can we ensure the water utility or operator provides written reconciliation and confirmation on a regular basis if we do not have a vendor agreement? We have a very large number of water utilities in our state, and some are very small.**

**Answer:** OCS recognizes that grant recipients may not enter into a written agreement or contract with all water utility vendors. There are a number of options for grant recipients to consider in their policies and procedures. For example:

- Grant recipients may send an agreement to the utility vendor at the same time a payment is sent that states the utility vendor agrees to various terms by accepting the payment. Grant recipients can include confirmation that benefits have been credited appropriately and that services have been restored on a timely basis or disconnection status has been removed in these terms.

- Grant recipients may call the utility vendor and ask for verbal confirmation that benefits have been credited appropriately and that services have been restored on a timely basis or disconnection status has been removed. Grant recipients should maintain written documentation to support verbal confirmations with vendors, for example sending a letter or spreadsheet to the vendor summarizing the verbal confirmation.
- Grant recipients may call the household and ask for verbal confirmation that benefits have been credited appropriately and that services have been restored on a timely basis or disconnection status has been removed. Grant recipients should maintain written documentation to support verbal confirmations with households, for example adding notes to an internal document or spreadsheet or sending a letter to the household to summarize verbal confirmation.
- Grant recipients may accept a copy of a regular billing statement sent to the household, which confirms that the payments have been properly credited.

**6. Can tribes provide LIHWAP benefits for tribal members who do not live within the boundaries of tribal lands?**

**Answer:** Yes, tribes may serve any tribal member household as long as that same household does not also receive assistance through a state LIHWAP program. LIHWAP tribal grant recipients serving tribal members outside of tribal lands should establish policies and procedures to ensure LIHWAP beneficiaries are not receiving allowable LIHWAP benefits from multiple sources. The procedure may include a shared data agreement with the state in the same geographical location as the tribe to avoid duplication of services. The process could also include requiring a formal self-attestation from the beneficiary confirming that the household has not applied for or received LIHWAP water assistance from the state LIHWAP program and will not apply for such benefits through the state LIHWAP program in the future.

**7. Can tribes provide LIHWAP benefits for households that are not tribal members but reside within tribal lands?**

**Answer:** Yes, tribes have discretion to serve any eligible household residing within a tribal jurisdiction or to limit benefits to tribal members. However, if a tribe limits its grant benefits to tribal members only, the tribe should establish procedures for referral and linkage of other potentially eligible households residing within tribal lands to the state LIHWAP program in the same geographical location as the tribe.

If you have questions or specific circumstances that differ from the information or scenarios described above, please contact your assigned program contact to discuss.

/s/

Lauren Christopher  
Director, Division of Energy Assistance  
Office of Community Services