

**U.S. Department of Health and Human Services
Administration for Children and Families
Office of Community Services (OCS)**

**Instructions for Completion of Model Plan
for Low Income Household Water Assistance Program (LIHWAP)**

OVERVIEW

The LIHWAP Model Plan is a tool for submission of information necessary for the expenditure of grant funds for payments to owners or operators of public water systems or treatment works on behalf of low-income households as required under the terms and conditions agreed to by States, Territories, and Tribes prior to receipt of a LIHWAP grant.

General Terms and Conditions for all mandatory grants and LIHWAP program terms and conditions are available on the following web links:

General Terms and Conditions – ACF Mandatory Grants

https://www.acf.hhs.gov/sites/default/files/documents/general_terms_and_conditions_2019_final.pdf

LIHWAP Program Terms and Conditions

<https://www.acf.hhs.gov/sites/default/files/documents/LIHWAP%20Terms%20and%20Conditions%20for%20States.pdf>

As noted in the LIHWAP Terms and Conditions, and consistent with legislative instructions in the Consolidated Appropriations Act, 2021, Public Law No: 116-260, LIHWAP grantees should, to the extent practical, use existing processes, procedures, and policies currently in place to provide assistance to low-income households.

GENERAL INSTRUCTIONS

The LIHWAP Model Plan is provided in an interactive (fillable) Portable Document Format (PDF). A single application format is provided for states, territories, and tribes. The plan is a combination of check-off boxes and narrative. In most narrative sections, answers are limited to no more than 2500 characters (approximately 1 page) of text. Text will scroll so that not all text will be readable. OCS has the following recommendations to expedite completion of this plan:

- ***Adapt Responses from LIHEAP Plans Where Appropriate*** - The LIHWAP Model Plan is closely modeled on the model state and tribal plan question and formats for the Low-Income Home Energy Assistance Program (LIHEAP). Therefore, it is strongly recommended that States,

Territories, and Tribes review and have available the most recently accepted LIHEAP plan while completing the required sections of the LIHWAP Model Plan. Throughout these instructions, OCS has noted areas where it will be acceptable to cut, paste, and modify content from the LIHEAP plan.

- ***Consider Emergency Flexibilities***– LIHWAP funding is part of emergency supplemental appropriations from the Consolidated Appropriations Act, 2021 and the American Rescue Plan Act of 2021. The funding provides urgently-needed payments on behalf of low-income households for drinking water and wastewater needs. Where possible, States, Territories and Tribes should not only expedite plan development by modeling on LIHEAP processes and procedures, but also look for ways to expedite the distribution of resources.
- ***Look for Opportunities for Categorical/Integrated Eligibility Determination*** – Consistent with the LIHEAP model, OCS has provided states, territories, and tribes with considerable flexibility to adapt policies and procedures to local needs and systems. In developing this plan, grantees are strongly encouraged to use and adapt existing outreach mechanisms, intake systems, eligibility determination procedures, and monitoring infrastructure. This not only will help prevent duplicate systems and ensure operational efficiency, but also can improve services by helping households avoid having to provide duplicate information and duplicate applications.

SECTION-BY-SECTION INSTRUCTIONS

Section 1 – Funding Allocations

Key Tips for Section 1

- ***Review LIHEAP Criteria*** - OCS strongly recommends reviewing current state or tribal policies related to eligibility and documentation for LIHEAP prior to completing questions in this section. While the grantee may elect to implement different policies for LIHWAP (and may in fact choose to simplify application procedures or eligibility requirements for emergency purposes) the current LIHEAP policies, practices, and procedures are a good starting point for planning.
- ***Determine Key Components and Allocations*** - Question 1.4 relates to program components and estimated allocations for the entire grant. In other words, grantees will outline expected LIHWAP expenditures for the entire State, Territory or Tribal area.
- ***Consider Categorical Eligibility to Expedite LIHWAP Benefits*** – Question 1.5 is related to “Categorical Eligibility” which means the State, Territory or Tribe establishes policies allowing for expedited eligibility determination based on the fact that a household is already eligible another means-tested program including the Temporary Assistance for Needy Families (TANF), the Supplemental Nutrition Assistance Program (SNAP), Supplemental Security Income (SSI), the Low-Income Home Energy Assistance Program (LIHEAP), or Means-tested Veterans Programs. Using this option will result in reduced documentation review for grantee staff as well as reduced duplication and burden for households.
- ***Provide a Direct Application Option*** – While it is likely that a large proportion of eligible households will already be enrolled in TANF, SNAP, SSI, LIHEAP, or Means-Tested

Veterans Programs, the LIHWAP funds are not limited to these households. Questions 1.6 and 1.7 are focused on grantee policies for determining LIHWAP income eligibility for households that are not already enrolled in one of these programs. Please note that the policies for income eligibility (e.g. whether to based income on gross income or net income and what income sources are considered) are largely within the discretion of State, Territorial, and Tribal grantees. OCS encourages grantees to begin with a review of existing LIHEAP policies and then consider any emergency flexibilities if appropriate to ensure timely household assistance.

Question by question instructions for Section 1 are provided below.

- 1.1 Provide a brief narrative description of the current needs within your State, Territory, or Tribe that are related to the OCS priorities for LIHWAP. Examples of priorities may include restoration of household water services, reducing arrearages for household water bills, and reducing rates charged for household water services. Provide additional narrative, if applicable, to describe special issues or concentrated needs within your service area. For example, concentrated needs related to specific areas, populations, etc.
- 1.2 Describe the operational priorities that will be employed to provide immediate, emergency relief to individuals and families. Please note while states, territories, and tribes should consider current priorities related to both the public health and economic priorities related to COVID-19 recovery, there is no requirement for individuals or households to document direct impact from COVID-19.
- 1.3 Provide an estimated date for when the first payments will be made on behalf of eligible households to restore household water services, reduce arrearages for household water bills, and/or reduce rates charged for household water services.
- 1.4 In the two columns provided, enter the estimated percentage of funds that will be allocated to Household Benefits, Outreach/Eligibility Determination, Administration-State, and Administration-Subrecipients. Two columns are provided in order to outline how LIHWAP funds will be allocated for the two separate sources of funding (the Consolidated Appropriations Act of 2021 and American Rescue Plan award funds). For each separate column, the total must add up to 100 percent. Grantees have the discretion to allocate a larger or smaller percentage of funding to Household Benefits or Outreach/Eligibility Determination or each separate column. However, the combined total for Administration (Administration-State + Administration-Subrecipients) must not exceed 15 percent of the total in either column.
- 1.5 Describe operational plans for categorical eligibility for households already determined to be eligible for *any* of the following programs: TANF, SNAP, SSI, LIHEAP, or Means-Tested Veterans Programs. In the LIHWAP Model Plan, categorical eligibility refers to a determination that a household is eligible for LIHWAP assistance based on enrollment in one of the means-tested programs identified above. If a household is determined by the grantee to be categorically eligible, that means that the grantee or subgrantee's intake staff do not need to repeat the income test for purposes of the household qualifying for LIHWAP assistance. The intake staff would move forward to the benefit determination

calculation by looking at the total household income as reported on the LIHWAP application.

- 1.6 In the check-box on the left hand side, select either “Gross Income” or “Net Income” as appropriate based on the eligibility policies and procedures established by the state, territory or tribe.
- 1.7 List all forms of countable income that will be used to determine a household’s income for the purposes of LIHWAP eligibility. Please note that answers to this question apply only to eligibility determination for households that are not already categorically eligible for any programs identified in Question 1.3. The types of countable income are generally left to the discretion of the grantee and may include: wages, self-employment income, unemployment insurance, strike pay, Social Security Administration (SSA) benefits, Supplemental Security Income (SSI), retirement/pension benefits, general assistance benefits, rental income, alimony, child support, legal settlements, insurance payments made directly to the insured, Veterans Administration (VA) benefits, earned income of a child under the age of 18, income tax refunds, funds received for the care of a foster child, AmeriCorps Program payments.

Section 2 – Benefits

Key Tips for Section 2

- ***Review Income Eligibility Thresholds and Procedures for LIHEAP*** – The Federal income eligibility requirements in the LIHWAP Terms and Conditions are identical to the statutory requirements for LIHEAP. Likewise, the questions in section two are modeled on question in the LIHEAP Model Plan. Grantees may modify or simplify procedures for the new LIHWAP effort as long as they remain consistent with the criteria outlined in the LIHWAP Terms and Conditions, but the most-recently accepted LIHEAP plan for your state, territory or tribe provides a starting point for an acceptable response.
- ***Consider Priority Populations*** – Grantees may identify priority eligibility for vulnerable populations based on local needs. Options are provided (e.g. people with disabilities, young children, older adults, and households with a high water burden), but grantees may also identify other priority populations and special procedures based on state or local conditions and needs and systems.

Question by question instructions for Section 2 are provided below.

- 2.1 In the left-hand column, select the appropriate box (i.e. Federal Poverty Guideline, State Median Income, or Hybrid Federal and State) depending on LIHWAP policies for your State, Territory or Tribe. In the right-hand column, enter the income eligibility threshold (as a percentage of the poverty or income level) that is established for LIHWAP in your State, Territory, or Tribe. Please refer to Terms and Conditions (11(c)(2)) for federal parameters on income eligibility. If your State, Territory or Tribe has selected the Federal Poverty Guidelines for income eligibility, the LIHWAP eligibility threshold cannot exceed 150 percent of the poverty level. If your State, Territory or Tribe has

selected State Median Income, the LIHWAP eligibility threshold cannot exceed 60 percent of the State Median Income.

Note: The “Hybrid Federal and State” box should only be selected in the circumstances where a state, territory or tribe has established a detailed and specific policy in which the Federal Poverty Guidelines are used for certain sizes of households and the State Median Income is used for households of other sizes. In these instances, the grantee should provide the percentage in the right hand column that will apply for the Federal Poverty Level and provide a detailed narrative explanation in the available narrative box at the end of Section 2.

- 2.2 Check “yes” if the State, Territory, or Tribe will have additional eligibility requirements. If “yes”, use the box below question 2.2 to describe any additional eligibility requirements beyond the income threshold.
- 2.3 Provide a detailed explanation for any additional eligibility policies. Please note that this question is comparable to information from LIHEAP model plan and is intended to identify any differences in practices for different types of renters. In part, these practices may be needed because grantees may need to work with/through property owners, especially if water utilities are included in rental payments.
- 2.4 Check all boxes that apply to variables that will be considered in determining LIHWAP benefit levels (e.g., factors that will make households eligible for a lower- or higher-level of assistance). *Note: These variables may be later included in a benefit table or benefit matrix.*
- 2.5 In the box for “Minimum Benefit” enter the lowest amount of LIHWAP assistance a household may receive according to policies established by your State, Territory, or Tribe. In the box for “Maximum Benefit” enter the highest amount of LIHWAP assistance a household may receive according to policies established by your State, Territory or Tribe.
- 2.6 Check “Yes” if LIHWAP benefits may only be paid once during the project period (e.g., one-time payment of household water arrearages after which no further payments may be made). Check “No” if a benefit may be paid more than once during the project period (e.g., full or partial payments of monthly water bills). If you checked “No” use the narrative box to explain how frequently benefits may be paid (e.g. monthly, quarterly).
- 2.7 Check “Yes” if LIHWAP policies or procedures in your State, Territory or Tribe will give priority to people with disabilities, households with young children, households with older adults (60-years-old or older), or households with high water burdens (see definition above). Check “No” if no priority is not given to any of these households/populations.
- 2.8 Provide narrative to describe how your State, Territory, or Tribe will prioritize water assistance to vulnerable populations identified in question 2.7.

- 2.9 Check “Yes” in the box below if your State, Territory, or Tribe will provide a method for people to submit applications without leaving their homes (e.g., telephone, online, or outreach-based enrollment), or if assistance will be provided to help people with physical disabilities to travel to intake sites. Check “no” if there is no method for individuals to apply without leaving their home. If “no” provide additional narrative to explain the absence of methods for populations to apply for benefits without leaving their home.
- 2.10 Check “Yes” in the box below if your State, Territory, or Tribe will provide a method for homebound individuals to travel to sites where applications for assistance are available. Check “no” if no method of travel to application sites is available to homebound individual. If “no” provide additional narrative to explain alternative methods for application intake for homebound or physically disabled individuals.
- 2.11 Check “Yes” if any water utility vendors are subject to a moratorium on shut-offs. For example, state-established moratorium may have been established due to Covid-19 public health public health considerations. Check “No” if no moratoria on shut-offs were established for water utilities your state, territory, or tribal area.
- 2.12 If you checked “Yes” describe the terms of the moratorium (e.g., who issued the directive for the moratorium, start and end dates, geographic areas covered, any specific limitations on households covered).
- 2.13 Check “Yes” if LIHWAP payments will be contingent on vendors taking specific measures or maintaining existing supports to alleviate the water burden of eligible households. Check “No” if no conditions will be applied. If you check “Yes” use the check-boxes in this section for Covid-Specific or General Conditions that will apply. Additional narrative explanation, including description of any additional consumer protections already in place within your State, Territory or Tribal area, may be provided if necessary in the final field of this section.

Section 3 – Outreach

Key Tip for Section 3

- ***Consult with any local providers regarding outreach plans and intake expenses*** – Because LIHWAP is a new emergency resource, grantees are encouraged to consider a range of outreach approaches. While a single set of activities must be identified for the state, territory or tribal plan, a range of methodologies may be appropriate based on local community populations, water systems and conditions.

Question by question instructions for Section 3 are provided below.

- 3.1 Use the check-boxes to select any types of outreach activities that will be implemented for the LIHWAP effort. Multiple boxes may be selected. Provide a narrative description of any other outreach approach that clearly does not fit within the examples provided.

Section 4 – Coordination

Key Tip for Section 4

- **Consider a Wide Range of Coordination Approaches**– Coordination can include intake and application processes, but also may include other activities such as coordination with private and philanthropic resources to coordinate or leverage resources to meet the full range of water and wastewater assistance.

Question by question instructions for Section 4 are provided below.

- 4.1 Provide a narrative description of any joint application, intake referrals, one-stop intake, or other coordination efforts with other programs available to low-income households. Describe which programs participate in these coordination efforts where applicable. Describe other coordination activities, such as coordination with private and philanthropic resources or other activities to address the full range of needs for households.
- 4.2 Provide a narrative description of coordination efforts planned with regulatory authorities that govern water suppliers. Provide the name of each regulatory agency and specific activities (e.g., routine information sharing, coordination meetings, policy coordination) that are anticipated.

Section 5 – Agency Designation

Key Tip for Section 5

- **Review Existing Provider Organizations** – States, Territories, and Tribes may selected local administering agencies to assist in outreach, eligibility determination and/or provision of household benefits. Grantees are encouraged to review existing LIHEAP provider networks to ensure timely distribution of emergency resources and ensure consistency with existing policies and procedures for this related utility support.

Question by question instructions for Section 5 are provided below.

- 5.1 Select the closest applicable organizational category for the leading LIHWAP state agency based on the options provided. Select “Other” and provide a description only if the LIHWAP lead agency clearly does not fit within any of the other category options provided.
- 5.2a In the space provided, give a brief narrative explanation of who determines client eligibility for drinking water and wastewater assistance.
- 5.2b In the space provided, give a brief narrative explanation of who processes benefit payments for drinking water and wastewater assistance.
- 5.3 Describe how the state, territory, or tribal LIHWAP agency selects local administering agencies for LIHWAP. This should only be completed if the State, Territory, or Tribe is not proving central administered benefits directly on behalf of households. If the state,

territory, or tribe is using the same entities that provide LIHEAP services locally, this may simply be noted. If the local administering agencies for LIHWAP will be different from those that provide LIHEAP, provide a detail narrative explanation of the rationale for this approach and selection process.

- 5.4 Provide the number of local administering agencies in the space provided.
- 5.5 Select the type of local administering agency (e.g., Community Action Agencies, local governments, city governments, county governments, or other nonprofits) that will be used. More than one box may be selected. Additional narrative explanation can be provided in the space below in this section if needed.

Section 6 – Water Suppliers

Key Tips for Section 6

- ***Research and Consult with Water Utility Providers, Associations and Consumer Representatives*** – For many state, territorial and tribal LIHEAP offices, the biggest “learning curve” for this new effort will be to establish new vendor agreements and payment policies for water utilities and water treatment works. Grantees are encouraged to use the public input process for plan development with a variety of stakeholders to identify appropriate payment procedures and assistance to prevent disconnections, restore services or ensure affordable ongoing services.

Question by question instructions for Section 6 are provided below.

- 6.1 [For tribes only] Indicate whether the tribe (or an outside water utility) charge households for drinking water and wastewater services. If the answer this question is “No” skip questions 6.2, 6.3, and 6.4.
- 6.2 In the space provided, give a narrative description of the process by which households will be notified of the amount of assistance provided and the timing of assistance. For example, households may receive a written notification by mail, email, text, or a combination (dependent upon the preferences of households or available information at the local administering agency or water utility).
- 6.3 Provide a narrative explanation of policies, procedures, or conditions (e.g., on vendor agreements) that will assure that households are not treated adversely because of LIHWAP assistance (as is required in the LIHWAP Terms and Conditions).
- 6.4 Describe how the State, Territory, or Tribe (or any local administering agencies) will assure that water utilities restore services or maintain continuity of services due to LIHWAP payments. Examples may include conditions on vendor agreements, reports of services restored, and/or direct confirmation with households that services were restored or maintained after LIHWAP payment.

- 6.5 [For tribes only] Provide a description of record-keeping, documentation and procedures to show that LIHWAP funds were expended for actual drinking water and wastewater costs.

Key Tips for Section 7:

- **Review LIHEAP Audit Plan**— The question in Section 7, and requirements under the Single Audit Act and 45 CFR 75, Subpart F are comparable to the requirements for LIHEAP. To the extent that grantees are using the same state, territorial or tribal organizations and the same local administering agencies, grantees are encouraged to review existing LIHEAP processes and procedures and plans prior to responding to this section.

Question by question instructions for Section 7 are provided below.

Section 7 – Program, Fiscal Monitoring, and Audit

- 7.1 Provide a brief narrative description of fiscal accounting and tracking processes in place for LIHWAP funds. Note: If comparable procedures and systems to those used for LIHEAP will be used, grantees may use comparable language to the response provided in the most recently accepted LIHEAP plan for the state, territory or tribe.
- 7.2 Provide information related to any findings rising to the level of material weakness or reportable condition cited in the Single Audit from the most recently audited fiscal year. Check “No Findings” if there have been no findings for the State, Territory, Tribe, or local administering agencies in the most recent Single Audit or in grantee monitoring assessments (e.g., for LIHEAP), Inspector General Reviews, or other government agency reviews that the LIHWAP lead agency was subject to. Note: If the grantee is using the same local administering agencies as LIHEAP—and the grantee does not have information on any audit findings or material weaknesses that have occurred since the LIHEAP plan submission, the response may be the same as the most recently accepted LIHEAP plan. Any audit findings or material weaknesses must be provided in the table provided along with a brief summary and information on how the issue was resolved and/or any ongoing actions underway to resolve the finding.
- 7.3 Using the check boxes provided, identify any current methods in place for assuring compliance with LIHWAP requirements (including those established by OCS in its general and program-specific terms and conditions) as well as methods to assure compliance with any additional requirements established by the state, territory, tribal government. Use the narrative box to describe any additional review mechanisms in place beyond those included in the check boxes for grantee staff and local administering agencies.
- 7.4 Provide a narrative explanation of the grantee’s monitoring schedule and protocol for local administering agencies (if applicable). In lieu of the narrative explanation, the actual monitoring protocol and schedule may be attached.

- 7.5 Describe how the state, territory, or tribal government will select local administering agencies for monitoring reviews (either site visits or desk reviews). For example, selection may be based on a regular LIHEAP schedule or a risk analysis and prioritization process.
- 7.6 Indicate how often the local administering agencies will be monitored (either through a site visit or desk review) over the project period. *Note: This answer should be consistent with the monitoring protocol and schedule described in response to question 7.5.*
- 7.7 Provide the actual number of local administering agencies currently on corrective action plans for issues related to **eligibility and/or benefit determination issues**. *Note: To answer this question, grantees should review existing LIHEAP monitoring records as well as other records (e.g., Community Service Block Grant) for the local administering agencies. If the state, territorial, or tribal agency administering LIHWAP is not also the LIHEAP Lead Agency, the grantee must consult with the LIHEAP Lead Agency prior to responding to this item.*
- 7.8 Provide the actual number of local administering agencies currently on corrective action plans for issues related to **financial accounting or administrative issues**. *Note: To answer this question, grantees should review existing LIHEAP monitoring records as well as other records (e.g., Community Service Block Grant) for the local administering agencies. If the state, territorial, or tribal agency administering LIHWAP is not also the LIHEAP Lead Agency, the grantee must consult with the LIHEAP Lead Agency prior to responding to this item.*

Section 8 - Public Participation

Key Tips for Section 8:

- **Use the Public Input Process as a First Step for Outreach and Engagement** – While the Terms and Conditions for LIHWAP require a public input process, a hearing is not specifically required. Grantees are encouraged to use the public input process as a first step in engagement with key stakeholders, water utilities, and consumer representatives.

Question by question instructions for Section 8 are provided below.

- 8.1 Check the appropriate boxes for any methods of public input used in the development of the LIHWAP plan. Provide a brief narrative description of any approaches not included in the check-boxes.
- 8.2 Provide the number of actual individual comments received from different parties.
- 8.3 Briefly summarize comments received on the plan. If multiple parties provided similar comments, provide key themes or “clusters” of comments.
- 8.4 Briefly summarize any changes made to the plan as a result of public comments. If no changes, were made, enter “None.” If any comments have been summarized in response

to question 8.3, but no changes were made, provide a brief explanation of why no changes were made (e.g., recommended changes were not consistent with LIHWAP Terms and Conditions, recommended changes were not consistent with state or tribal policies, recommended change was not necessary).

Section 9 - Fair Hearings

Key Tips for Section 9:

- **Review LIHEAP Fair Hearings Process** – The fair hearings process may be comparable to the fair hearings process for LIHEAP within your State, Territory, or Tribe. OCS recommends reviewing the most-recently accepted LIHEAP Plan for your State, Territory, or Tribe and adapting this section to the extent feasible and appropriate for LIHWAP.

Question by question instructions for Section 9 are provided below.

- 9.1 Provide a narrative description of hearing procedures that will be available for households whose applications are denied or where the applicant disputes the benefit amount. Because LIHWAP is a new emergency grant effort, grantees may describe a plan and commitment for a hearing process that is modeled on the processes, procedures and requirements already in place for LIHEAP as appropriate.
- 9.2 Provide a description of when and how applicants will be informed of these rights (e.g., orally and in writing during the intake or eligibility determination process).
- 9.3 Provide a narrative description of current or planned fair hearing procedures for households whose applications are not acted upon in a timely manner.
- 9.4 Provide a description of how and when applicants will be informed of these rights (e.g., orally and in writing during the intake or eligibility determination process, via a public-facing website).

Section 10 – Training

Key Tips for Section 10:

- **Consider Core Content and Rapid Training Approaches** – OCS has identified some options for core content (e.g. orientation to LIHWAP Terms and Conditions, Administrative Requirements, Policies and Procedures, and Eligibility Criteria). Grantees are encouraged to add additional training based on local systems and needs and to consider a variety of methodologies for training, such as online training, recorded training, in-person training or a combination.

Question by question instructions for Section 10 are provided below.

- 10.1 Provide narrative to describe the training strategy that will be employed to ensure grantee staff, local administering agencies, and participating water utility providers understand the requirements outlined in the Terms and conditions, eligibility requirements, and the

procedures described in the plan. Provide additional narrative to describe any resources needed to carry out the training strategy.

Section 11 – Performance Management

Key Tips for Section 11:

- ***Provide Input on Expected Challenges, Technical Assistance Needs and Potential Performance Goals*** – Because OCS is currently developing data and reporting requirements for the new LIHWAP effort, responses in Section 11 will be used by OCS in adapting exiting LIHEAP reporting tools and will provide technical assistance to grantees based on challenges identified in responses provided in this section. The input provided in this section will be reviewed in finalizing reporting tools and requirements. While the specific data elements have not been finalized, grantees may refer to the LIHWAP Terms and Conditions for additional information on the types of information that will be requested:

<https://www.acf.hhs.gov/sites/default/files/documents/LIHWAP%20Terms%20and%20Conditions%20for%20States.pdf>

Please note that as outlined in Term and Condition #10, OCS will provide an OMB-approved reporting format with data elements in the following areas:

- the amount, cost, and type of water assistance provided for households eligible for assistance under this award;
- the type of water assistance used by various income groups; the number and income levels of households assisted by this award;
- the number of households which received such assistance and include one or more individuals who are 60 years or older, include a household member with a disability, or include young children;
- the impact of each grantee’s LIHWAP program on recipient and eligible households (e.g., amount of assistance to each household, and whether assistant restored water service or prevented shutoff); and
- administrative information regarding local providers (if applicable), agreements with water utilities, recommendations, accomplishments and lessons learned.

Question by question instructions for Section 11 are provided below.

- 11.1 Based on your current understanding and analysis of potential data needs, provide a narrative description of potential challenges related to reporting. Please note that likely topics for reporting will include information on the number of households assisted, the average benefit amount provided, the number of households whose water or wastewater services were restored because of the benefit, demographics of applicants and beneficiaries, and the number of imminent disconnections of water or wastewater services avoided because of the LIHWAP benefit.

- 11.2 Based on your current understanding and analysis of potential data needs, provide a listing or description of areas for technical assistance related to data collection, analysis, and reporting for LIHWAP.

Section 12 – Program Integrity

Key Tips for Section 12:

- ***Consider Adaptations and Application of LIHEAP Program Integrity Processes*** – The content of this section is virtually identical to Program Integrity Sections in the LIHEAP Model Plan. Existing LIHEAP program integrity mechanisms can be adapted or expanded include LIHWAP with appropriate public advertising.

Question by question instructions for Section 12 are provided below.

- 12.1 a. Check the appropriate boxes for any fraud reporting mechanisms that will be available to the public for reporting cases of suspected waste, fraud, or abuse as well as strategies for advertising. Multiple boxes may be selected.
b. Check appropriate boxes to indicate strategies that will be used to advertise resources referenced in 12.1(a).
- 12.2 a. Using the checkboxes and table format provided, indicate which forms of documentation will be required or requested from LIHWAP applicants or their household members. Multiple boxes may be selected. *Note: Any documentation should be based on state, territorial, or tribal policies, procedures, and requirements. The types of documentation included in the checkboxes in question 12.2 are examples of documentation required by LIHEAP grantees for some or all household members based on policies within the State, Territory or Tribe. Comparable documentation and procedures may be instituted for LIHWAP households. Identification requirements may be modified or simplified for households that are categorically eligible based on enrollment in LIHEAP, TANF, SNAP, SSI, or Means-Tested Veterans Programs.*
b. Provide brief narrative to describe any exceptions to the required or requested documentation from LIHWAP applicants that are not categorically eligible.
- 12.3 Check all appropriate boxes for any identification verification methodologies that will be used to verify the authenticity of identification documents provided based on state, territorial or tribal policies, procedures, and requirements. Multiple boxes may be selected.
- 12.4 Check all appropriate boxes for verification of citizenship or legal residency. Multiple boxes may be selected. *Note: Consistent with current policies and procedures for LIHEAP, household benefits in LIHWAP may be provided to any household based on the number of household members who are U.S. citizens or legal residents.*
- 12.5 Check all appropriate boxes for any methodologies that will be used to verify the income provided based on state, territorial, or tribal policies, procedures, and requirements.

Multiple boxes may be selected. *Note: Documentation described in this question pertains only to households that are not categorically-eligible based on a previous eligibility determination for TANF, SNAP, SSI, LIHEAP, or Means-Tested Veterans Programs.*

- 12.6 Check the appropriate boxes for financial and operating controls that will be in place to protect client information against improper use or disclosure. Multiple boxes may be selected.
- 12.7 Check the appropriate boxes for policies that will be in place to verify the authenticity of the drinking water and wastewater utilities (vendors) that will receive LIHWAP payments on behalf of eligible households. Multiple boxes may be selected.
- 12.8 Check the appropriate boxes for any policies that will be in place to protect against fraud when making benefit payments to water utilities on behalf of clients. Multiple boxes may be selected.
- 12.9 Check the appropriate boxes for any grantee procedures for investigating and prosecuting reports of fraud, and any sanctions placed on clients/staff/vendors found to have committed fraud. Multiple boxes may be selected.

Section 13 - Certification Regarding Debarment, Suspension, and Other Responsibility Matters

The Governor's Authorized Official must carefully review and then check the certification before submitting. Note: Any signature (electronic or hard copy) by anyone other than the Governor's Authorized Official must be accompanied by a letter directly and specifically delegating the signature authority.

Section 14 - Certification Regarding Drug-Free Workplace Requirements

The Governor's Authorized Official must carefully review and then check the certification before submitting. Note: Any signature (electronic or hard copy) by anyone other than the Governor's Authorized Official must be accompanied by a letter directly and specifically delegating the signature authority.

Section 15 - Certification Regarding Lobbying

The Governor's Authorized Official must carefully review and then check the certification before submitting. Note: Any signature (electronic or hard copy) by anyone other than the Governor's Authorized Official must be accompanied by a letter directly and specifically delegating the signature authority.