

Low Income Household Water Assistance Program (LIHWAP) Intake Benefits Toolkit

Purpose of this Toolkit

The purpose of this toolkit is to support LIHWAP recipients with procedural considerations related to applications, intake of potential LIHWAP clients, eligibility determination of potential LIHWAP clients, and benefit determination and notifications. This toolkit is for use by any staff involved in the LIHWAP program, including, but not limited to: intake workers, LIHWAP coordinators, local agency and/or subrecipient staff. Where applicable, helpful tips have been included for you to consider.

Developing LIHWAP Procedures

OCS encourages recipients not only to model LIHWAP intake and benefits efforts on LIHEAP processes and procedures, but also to look for ways to simplify and expedite the distribution of resources. LIHWAP procedures should be documented and readily available to program staff, other relevant employees (including fiscal), subrecipients (local agencies), vendors, and clients (as appropriate). Recipients should take into consideration that LIHWAP procedures should be consistent with the relevant organizational and state/tribal/territorial procedures and processes.

Please note that while LIHWAP terms and conditions are modeled on the Low-Income Home Energy Assistance Program (LIHEAP) statute, in order to ensure consistency in processes, procedures, policies, and systems, LIHWAP funds are not otherwise subject to LIHEAP statutory requirements. Within the limits of the LIHWAP Terms and Conditions, grantees have flexibility to modify existing processes and procedures for LIHWAP.

SECTION 1: APPLICATION AND INTAKE

How will your program identify potential LIHWAP applicants, and guide them through the application and intake process?

Identifying and performing intake of potential LIHWAP clients is a key step in successful implementation of your client-focused service delivery. As your staff navigates this part of LIHWAP service delivery, it's key to remember some important things about LIHWAP:

- LIHWAP grant funds are intended “to assist low-income households, particularly those with the lowest-incomes, that pay a high a high proportion of household income for drinking water and wastewater services”
- LIHWAP payments (may also be referred to as: benefits, benefit assistance, benefit payments, assistance payments) may be made “to reduce arrearages of and rates charged” to low-income households that pay a high proportion of household income for water services

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- According to legislative instructions, payments of benefits on behalf of eligible households must be made “by providing funds to owners or operators of public water systems or treatment works;” In short, benefit payments are not made directly to LIHWAP clients.
- LIHWAP recipients have considerable flexibility to adapt policies and procedures to local needs and systems.

TIP: LIHWAP recipients are strongly encouraged to use and adapt existing outreach mechanisms, intake systems, eligibility determination procedures. This will not only help prevent duplicate systems and ensure operational efficiency, it can also improve services by helping households avoid having to provide identical information and fill out duplicative applications.

Prioritizing Service Delivery

OCS recognizes that the available grant resources may not be sufficient to fully address all of the priorities within states, territories, and tribal areas. Recipients may identify priority eligibility for vulnerable populations based on local needs, focus resources on areas of concentrated need, or customize outreach strategies to address “hard-to-reach” populations or particularly at-risk populations, such as aging adults, individuals with disabilities, and households with young children.

Additionally, if a large number of households have significant arrearages and are at risk of disconnection of household water services or have already had services disconnected, grantees may place an immediate priority on the payment of arrearages as a first stage of program implementation. Recipients may then pay currently due bills to assure affordability of household drinking water and wastewater services as a next stage of program implementation, if resources permit.

TIP: LIHWAP recipients should verify information about their application and intake process based on their responses to their LIHWAP model plan. It is highly recommended that LIHWAP staff involved in the intake process have a copy of the model plan “on hand” in the development of policies and procedures, as well as to assist them during the course of their work.

LIHWAP Application and Intake - Information Needs

A key component of your application and intake process is determining what information you will need to collect from applicants to determine their eligibility for the program. Client information should help your program to better:

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- Cross-check eligibility information from other programs and database systems
- Emphasize referral and coordination with other assistance and benefit programs
- “Cross-pollinate” client education efforts with other programs
- Gather client demographics for reporting purposes
- Identify services based on client needs

Methods to Expedite Application and Intake

To best expedite your application and intake procedures, LIHWAP recipients could consider the following methods:

- **Joint intake applications for multiple programs.** For example, doing intake for multiple programs at the same time (such as LIHEAP and LIHWAP) to avoid duplicating the effort among staff, or increasing the burden on the applicant in applying for multiple public assistance programs they could be eligible for.
- **Intake/referral from other programs.** For example, setting up an internal process and procedure to receive client referrals from programs that are already doing similar application and intake. Such as LIHEAP, Temporary Assistance for Needy Families (TANF), and Supplemental Nutrition Assistance Program (SNAP) (see categorical eligibility below)
- **Intake/referral from water vendors.** Water vendors have information about households that are disconnected or in arrears. Establishing processes for information sharing or referrals from vendors is another method to identify priority households.
- **Intake centers.** LIHWAP recipients operating intake centers should consider how to integrate the LIHWAP application process into existing procedures in order to streamline services.
- **Identifying eligible households through shared data systems.** LIHWAP recipients who use shared electronic case management or data systems, could consider methods to identify potential eligible households through information already entered in their systems. This may help expedite applicant identification, the referral process, and application processing.
- **Utilizing local agencies/subrecipients:** Recipients may select local administering agencies to assist in outreach, eligibility determination, and/or provision of household benefits. Recipients 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.
- **Walk-In intake:** LIHWAP recipients conducting walk-in applications should consider ensuring that intake staff are equipped and trained to use a combination of the above methods to screen potential applicants for eligibility.

TIP: OCS strongly encourages LIHWAP recipients and administering agencies to combine intake for LIHEAP/LIHWAP. In addition, LIHWAP recipients may find it helpful to reformat, revise or

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repurpose existing LIHEAP client applications for LIHWAP. In addition, OCS recommends that LIHWAP recipients who do not yet have a suitable application for LIHWAP services, utilize the LIHWAP [household application sample tool](#) to assist in their application efforts. LIHWAP recipients may customize this tool to fit their program needs. Using the tool is not a requirement, but it may assist LIHWAP recipients in developing a sample client application.

SECTION 2: ELIGIBILITY

As LIHWAP applicants seek out assistance, your LIHWAP staff will need to assess their eligibility for the program. There are two approaches to determining eligibility for LIHWAP benefits, income eligibility and categorical eligibility. Each term is defined below:

Income Eligibility

For the purposes of LIHWAP, income eligibility means that a household has qualified for water utility (LIHWAP) assistance based on an intake worker's review of the total household income of all household members and any other eligibility criteria required by the State/Tribe/Territory, plus a determination that the total household income is below the eligibility threshold established by the State, Territory, or Tribe (e.g., at or below 150 percent of the Federal Poverty Line, at or below 60 percent of the State Median Income, or another lower poverty threshold established by the State, Territory, or Tribe).

Categorical Eligibility

For purposes of LIHWAP, categorical eligibility refers to a determination that a household is eligible for LIHWAP assistance based on enrollment in 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.

Income Eligibility Determination

While it is likely that a large proportion of eligible households will already be enrolled in TANF, SNAP, Supplemental Security Income (SSI), LIHEAP, or Means-Tested Veterans Programs, the LIHWAP funds are not limited to these households, and LIHWAP recipients must establish a process to determine LIHWAP eligibility based on income for households that are not already enrolled in one of these programs. Income limits for LIHWAP are capped at either 150% of the Federal Poverty Guideline or 60% of State Median Income.

Developing Income Eligibility Procedures for New Clients

Please note that the policies for income eligibility (e.g., whether to base eligibility on gross income or net income and what income sources are considered) are largely within the

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discretion of state, territorial, and tribal grant recipients. 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.

For Clients who may be Categorically Eligible

Categorical eligibility refers to a determination that a household is eligible for LIHWAP assistance based on enrollment in another means-tested program.

Consistent with the LIHWAP Terms and Conditions, LIHWAP resources may be used to make payments with respect to households in which one or more individuals are receiving the following:

- The Low Income Home Energy Assistance Program (LIHEAP);
- Temporary Assistance for Needy Families (TANF);
- Supplemental Security Income (SSI);
- Supplemental Nutrition Assistance Program (SNAP); or
- Means-tested Veterans Programs (payments under section 415, 521, 541, or 542 of title 38, United States Code, or under section 306 of the Veterans' and Survivors' Pension Improvement Act of 1978).

If a household is determined to be categorically eligible, that means that the recipient or subrecipient'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.

TIP: While categorical eligibility is strongly encouraged for all/any of the programs identified above, all grant recipients are asked to *at minimum* consider categorical eligibility for LIHEAP recipients, along with coordinated outreach and intake efforts where possible. Because many of the local administering agencies for LIHWAP are the same agencies that administer LIHEAP, categorical eligibility is both feasible and recommended to ensure efficiency, prevent duplication, and create opportunities for enhanced household supports.

Developing Procedures for Categorical Eligibility

While any of the programs identified in the LIHWAP [Terms and Conditions](#) may be used for intake and eligibility purposes in LIHWAP, each LIHWAP recipient selects which of these programs to include and must develop its own procedures for documenting that a household is officially enrolled. Recipients may establish procedures for time frames, acceptable documentation, and record-keeping.

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For example, procedures may include the following:

- Allowing household applicants to provide certain documents (e.g., an official letter documenting program eligibility, proof of water, and wastewater cost),
- A client release form allowing information sharing between programs, or
- Joint intake and eligibility determination (especially for programs administered within a single agency).

Please note, **recipients may not automatically determine that a household is eligible based on enrollment in a program that is not listed in the LIHWAP Terms and Conditions.** However, with household approval through a client release form, grantees may establish coordination or information sharing agreements to expedite eligibility determination (e.g., document sharing agreements, coordinated intake systems) with other programs.

Once a household is determined to be eligible through categorical eligibility, additional income eligibility assessment is not needed. A household can qualify for LIHWAP based on one of those options, either categorical eligibility or total household income. When a recipient allows categorical eligibility, the grantee reduces the administrative burden of the LIHWAP intake staff in that they do not need to repeat or verify the household or individual income for purposes of LIHWAP eligibility.

Categorical eligibility also reduces the burden for the household as they likely have fewer supporting documents to provide to apply for LIHWAP. For example, the recipient may choose to verify independently with the SNAP, TANF, or LIHEAP office that the household or household member is currently receiving another benefit. Alternatively, the recipient may accept a copy of the benefit letter provided by the applicant as support of the LIHWAP application.

Grant recipients must document income information for households that were determined to be eligible based on categorical eligibility for reporting purposes. There are a number of options available to grantees depending upon the systems and procedures of the state, territory or tribe.

For example, if an eligibility determination letter or accepted application materials from another program includes information on the income levels used to determine eligibility (and the household composition has not changed), grant recipients may establish procedures to use information from these materials in calculating a drinking water and/or wastewater burden.

Grant recipients may also establish procedures for information sharing or even joint applications with programs such as LIHEAP. In circumstances where income information is not available—or the household composition differs from the application of another program—recipients may need to obtain additional information on income for at least some household members.

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Citizenship and Residency Status

LIHWAP falls within the definition of “Federal Public Benefits,” outlined in the Personal Responsibility and Work Opportunity Reconciliation Act of 1996 (PRWORA), which limits eligibility for benefits to citizens or to qualified noncitizens (i.e. lawful permanent residents, asylees, refugees, and certain individuals with parole status). PRWORA prohibits the provision of these benefits to other noncitizens, including nonimmigrants (i.e., temporary residents) or undocumented immigrants. More information on these requirements is available on the following [website](#).

If a household is mixed status and includes both qualified household members (e.g. U.S. Citizens) and non-qualified household members, the appropriate policy will depend upon whether the recipient is paying for an arrearage (intended to restore services) or an ongoing rate reduction which provides a benefit for household members that can be pro-rated based on the number of eligible household members.

Recipients are encouraged to pay the full amount of an arrearage to reconnect services or prevent the disconnection of water services to a household with at least one qualified member in order to assure the availability of household water services. However, consistent with [policies and procedures established for LIHEAP](#), grant recipients must establish policies to pay only a pro-rated portion of any rate reduction benefits based on the number/percentage of qualified beneficiaries in the household.

Income Verification

A key component of determining eligibility for a LIHWAP client is through income verification. LIHWAP grant recipients were asked to indicate which forms of identification are required or requested to be collected from LIHWAP applicants or their household members as part of their model plan development process. Please refer to your model plan to ensure that those responses are included in the development of your income verification policies and procedures.

Income Eligibility

For the purposes of LIHWAP, income eligibility means that a household has qualified for water utility assistance (i.e., LIHWAP) based on an intake worker’s review of the total household income of all household members and any other eligibility criteria required by the State/Tribe/Territory, plus a determination that the total household income is below the eligibility threshold established by the State, Territory, or Tribe (e.g., at or below 150 percent of the Federal Poverty Line, at or below 60 percent of the State Median Income, or another lower poverty threshold established by the State, Territory, or Tribe).

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What is considered income?

There is no federal definition of income; as a result, grant recipients may develop their own definitions of income, as well as develop their own timeframes for counting income. Sources of income should be identified in the accepted grant implementation plan. In defining and counting income, recipients generally take into account these four factors:

- Countable (base) income, including but not limited to, wages, salaries and tips
- Non-countable or excluded income, including but not limited to, the value of SNAP benefits or benefits from certain other federal programs, or cash income over which the household has no control.
- Income deductions (what will be subtracted from income), such as medical expenses
- Time period to be used for counting income

In counting income, common grant recipient practices include:

- Count gross income of all household members; allow deductions or exclusions per recipient's policy. States choose to count gross income instead of net income for administrative efficiency, i.e., determining net income for each household would take more time due to consideration of a variety of potential deductions.
- Count net income only from self-employment or for Social Security income with Medicare deduction.

Applicants with No Income (i.e. zero income)

Recipients may encounter applicants or household members claiming to have no income. In those cases, recipients will interview the applicant or household member and/or have them fill out a form explaining how the household is meeting current living expenses such as rent, mortgage, utilities, food, etc. They may also require the applicant to sign a notarized statement saying they have no income. Collectively, this is known as a “zero income” or “no income” statement. LIHWAP recipients are encouraged to utilize existing LIHEAP forms or policies in creation of a no-income form, policy, and procedure.

Sources of Income Verification Documentation

To verify income, recipients will ask applicants to include documentation. Forms of documentation typically required during the application and intake process include:

- Pay stubs
- Social Security award letters
- Bank statements
- Tax statements

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- Zero-income statements (if applicable).

The required documentation and accompanying procedures should be consistent with any documentation included in the accepted grant implementation plan.

Identity Verification

Identity verification is a critical aspect of enrolling clients into LIHWAP. LIHWAP recipients were asked to indicate which forms of identification are required or requested to be collected from LIHWAP applicants or their household members as part of their model plan development process. Please refer to your accepted grant implementation plan to ensure that those responses are included in the development of your income verification policies and procedures.

Information to Request and Verify

The types of documentation required is at the discretion of the recipient. The types of documentation listed below are examples of documentation that may be required for some or all household members based on policies within the State, Territory or Tribe.

- full name
- residential street addresses (helpful in case of home visits)
- mailing address or P.O. box address
- telephone number
- county of residence
- date of birth
- gender
- Social Security Number (SSN)
- Photo identification
- Government issued identification cards (such as a driver's license, state ID, tribal ID, passport, etc.)
- Relationship clarification, such as the relationship of other household members to the applicant.
- Priority population status of household members, such as: veteran, disability, etc.

Additional Methods to Verify Income and Identity

As part of the verification process, other information that could be used to assist with identity confirmation include:

- Birth, hospital records
- Databases for public assistance programs, such as TANF or SNAP

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- Databases of other state agencies, including: Department of Motor Vehicles, Medicaid, Social Security Administration, State unemployment and child support offices
- Who to contact: Without e-verification through databases, consider developing a list of contacts with tribal and state programs, including state LIHEAP, to verify information by either email, fax, or telephone call.
- Tribal grantees could also benefit from reviewing the Tribal database of other tribally-administered assistance programs.

Case File Management

Maintaining LIHWAP applicant and client information in a secure and organized fashion is key to program integrity. LIHWAP recipients will want to consider existing case file management policies and procedures, and ensure that they are applicable to handle LIHWAP applicants and clients. A good starting point is to review what your agency is currently utilizing for LIHEAP.

Please refer to your model plan to ensure that the documentation required as part of your case file management policy includes information you included in the identify and income verification sections of your model plan and are in alignment with your income/identify verification policies and procedures.

LIHWAP recipients should ensure that their case file management protocol includes information about the type of documentation that must be included in a case file. This may include, but is not limited to the following:

- The Application and any other supplemental forms the applicant is required to submit (such as a zero income statement)
- A copy of a current picture ID for the applicant
- A copy of the Social Security card for the applicant and all household members
- Income documentation
- Proof of residence documentation
- A recent utility bill or account information

It is also likely that intake workers will need to document how they have screened applicants for eligibility. In doing so, make sure that your case file documentation includes information that supports eligibility determination for LIHWAP. Things to consider include:

- Calculations used to determine gross/net income
- Case notes that describe any inconsistencies between applicant information and information intake workers have obtained or reviewed during the income/identity verification process

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- Documentation of all communication and communication attempts with the applicant, including how the intake worker requested missing or additional information for incomplete applications
- Documentation that supports the steps taken by the intake worker to verify identify and income (i.e., determine eligibility for LIHWAP) and how that was overseen

TIP: Please remember that you will be working with your client's personally identifiable information (PII). Ensure case files are kept in a secure place, and that your policies clearly indicate who has access to this information. If you are utilizing hard copy case files, it's recommended that the information be stored in a secured (locked) location.

SECTION 3: BENEFIT DETERMINATION AND NOTIFICATION

If an applicant has been determined to be eligible for LIHWAP assistance, the next step is to determine their benefit amount. A household benefit is a payment approved by the recipient or subrecipient for applicant households and made on behalf of approved households to public water systems and wastewater utility companies to address arrearages and/or make a full or partial payment of a currently due water bill.

Recommended Practices for Benefit Policies

All LIHWAP grantees must establish their own written policies and procedures for intake workers to follow when deciding the benefit amount for each household. The grant recipient's LIHWAP Policy or Operation Manual should provide key definitions and steps that intake workers must follow when making benefit determinations. Such written policies and procedures are typically reviewed by independent monitors and auditors that check on your program's compliance with federal rules. The LIHWAP Policy or Operation Manual must address both equity and efficiency simultaneously. Having clear, equitable, and standard written procedures will help enable intake workers to be consistent and accurate in how they determine benefit amounts, which will help reduce the number of claims from applicants that appeal benefit determinations, also known as a fair hearing request. All applicants are entitled to make a fair hearing request, and all LIHWAP grantees must make fair hearing requests available to applicants.

There are several important rules that a LIHWAP grantee's benefit policies should address, including but not limited to:

- Clearly stating whether there is a minimum and/or maximum (cap) benefit amount for which households can qualify.
- Listing all allowable charges, the benefit can cover (e.g., reconnection fees, late fees, interests, lien removal fees, etc.).
- Noting timeframes for determining benefit amounts.

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- Providing a process for how to document the benefit calculation and building that into the eligibility determination software, if used.
- Explaining procedures for notifying households of their benefit determinations and building that into the eligibility determination software, if used.
- Outlining procedures by which applicants can appeal their benefit determination (e.g., requesting a “fair hearing” reconsideration). This includes the amount as well as the timeliness of the eligibility determination process.
- Incorporating the three priority groups that the ACF Office of Community Services (OCS) outlined during the [June 24, 2021 webinar](#) and have repeated below. While all households that qualify for LIHWAP benefits must meet income eligibility requirements outlined in the LIHWAP Terms and Conditions, a detailed benefit matrix is only a requirement for some services.

Benefit Matrix

A benefit matrix is utilized to determine the amount of LIHWAP assistance eligible households receive. It is a vital tool to help ensure program integrity. All staff working with LIHWAP clients should be familiar with the Benefits Matrix and know how to utilize it with eligible clients to determine benefit amounts.

For the purposes of LIHWAP, the benefit matrix is a tool, such as a chart or a point system, that outlines which LIHWAP benefit amount will be available to different households based on required factors—such as household income, household size, and household water costs/needs.

Developing a Benefits Matrix

As a first step in developing LIHWAP benefit policies, including a matrix for current bill assistance, recipients are encouraged to review current benefit matrixes and policies related to LIHEAP and consider whether it is appropriate and feasible to adapt those policies for household water assistance. While some elements of existing LIHEAP benefit matrixes will clearly differ from a water assistance program—such as household energy burden needing to be replaced with household water burden—other policies and procedures may be transferrable, such as household size and income.

There are several ways to assign values to the factors you chose for your benefit matrix. Two of the most common ways are **a point value system** and **a monetary value system**. Please review the [LIHWAP IM-2021-01 Benefit Policy and Matrix Resources FY2021](#) for complete information on these two systems and for sample benefit matrix charts.

Household Priority Groups and Benefit Determination

There are three LIHWAP household priority groups to consider when determining benefits.

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Grantees do not necessarily need a detailed benefit matrix for the first two household priority groups because LIHWAP may be used to cover the full outstanding bill for a household in order to restore water services or prevent disconnection. However, a benefit matrix will need to be developed for the third priority group.

- **Priority Group 1:** Households with Disconnected Water Services. The initial priority is to target assistance first for those households whose services are already disconnected. Grantees may use a variety of interventions to achieve the expected outcome of restoring service. This may include paying the entire amount past due plus all required fees or paying a portion of the outstanding balance and coordinating approval of other resources that can be used to bring the account current. Another intervention is paying a portion of the past due amount and negotiating reconnection of the service for 90 days or longer based on the LIHWAP benefit. Still another intervention might include negotiating with vendors to get the household on a budget payment plan. There are many interventions your team can use in coordination to achieve the outcome of restored service.
- **Priority Group 2:** Households with Pending Disconnection. The second priority group are the households that currently have service but are about to lose it because of nonpayment. This means they have a disconnection notice, or they could have an outstanding balance but have been protected by a disconnection moratorium that is about to expire. For this group, the expected outcome is to avoid a disruption of service regardless of how brief.
- **Priority Group 3:** Households Seeking Help with Current Water Bills (No Past Due Balance). The third and last priority is assisting households who have working service and are seeking help with current bills only, meaning they are not behind on their bills. It is for this last group of households that you will need some sort of benefit matrix or calculation to decide how to vary the amount of assistance for each of those households.

Benefit Notification

How will you notify LIHWAP applicants of their application status (approval/denial) and, if approved, the amount of the benefit assistance? Recipients were asked to explain this process in their LIHWAP implementation plan. To ensure that LIHWAP clients are accurately notified of the amount of assistance paid in a timely manner, please consider:

- **Accurate Contact Information:** Ensuring you have accurate contact information and preferred communication methods (i.e., mail, phone, email, in-person).
- **Explicitly State the Benefit Amount:** Always provide documentation of the benefit amount to the client that clearly states the benefit amount and how it was applied to the customer's account.
- **Reference the Fair Hearing Procedure:** Ensure that the benefit notification also includes reference to the fair hearing procedure.

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- **Maintain Documentation in Case Files (hard copy/electric):** LIHWAP recipients should ensure that they maintain documentation in client case files of when the benefit notification was delivered to the client and any follow-up activities with the client.

For households that rent, LIHWAP recipients may need to establish additional procedures to ensure notification to the applicant, who may not hold the water account but is the intended beneficiary. These procedures may include notifications to both the landlord and the renter.

Fair Hearing Procedure

Your fair hearing administrative procedures should be comparable to and may utilize existing processes, procedures, and systems currently in place for the State, Territory, or Tribe's Low Income Home Energy Assistance grant. When developing your fair hearing procedure, review what your LIHEAP program is doing as a first-step. In addition, consider that your fair hearing procedure should cover the following areas:

- Describe your fair, independent hearing procedures for households whose applications are denied or where the applicant disputes the benefit amount.
- When and how are applicants informed of these rights?
- Describe your fair hearing procedures for households whose applications are not acted on in a timely manner.
- When and how are applicants informed of these rights?

TIPS: LIHWAP recipients may benefit from ensuring that their fair hearing procedures are:

- Communicated to the public on their LIHWAP website. Additionally, visible to any applicant that is coming into a physical office location. For example, posting the fair hearing procedure in the waiting room or at the intake worker's desk.
- Reviewed with the applicant during intake procedures by the intake worker.
- Listed on the LIHWAP application for assistance.
- Listed on the notice of benefit determination when the client receives the notification.
- Provides a multi-level review and appeals process.