## **EAP Vendor Training PY2024**

August 2023

Henry Lowry Vendor Analyst



#### **TODAY WE WILL COVER**

The purpose of today's training is to prepare vendors for the PY 2024 EAP season by reviewing common issues and discussing ways to collaborate and improve for the upcoming season.

- 1. Highlight of the 2023 Season
- Overview of Vendor Guide and MOA
- 3. Changes to the MOA
- 4. Transmittal Process
- Vendor Portal
- Vendor Monitoring
- 7. Contact Protocols
- 8. Fuel Funds, Special Programs, and Additional Resources
- 9. Next Steps



#### THANKS FOR YOUR PARTNERSHIP

#### Successes of the 2023 Program year!

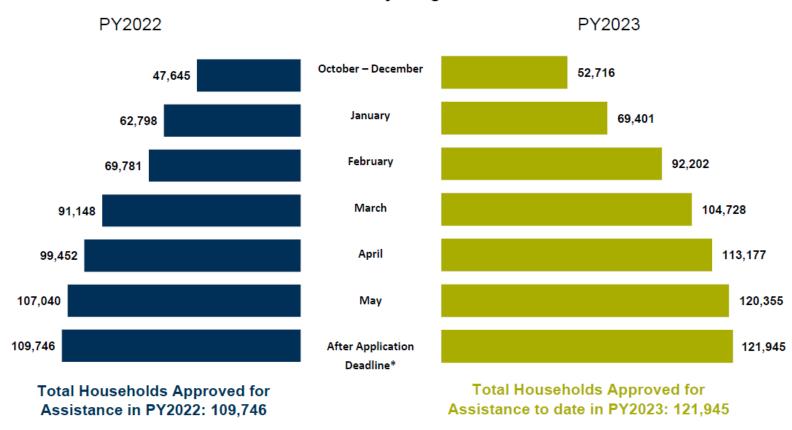
- For EAP PY23, we have served a total of 122,017 households so far an increase of 12,271 from PY22 (total served = 109,780)
- 40,857 crisis households have been assisted with EAP funding
- 79% (73/92) of counties individually served more households in PY23 than they did in PY22



# Total EAP Funding for Program Year 2023 October 2022 – September 2023 \$85,653,559

EAP Benefits Progress as of July 3, 2023

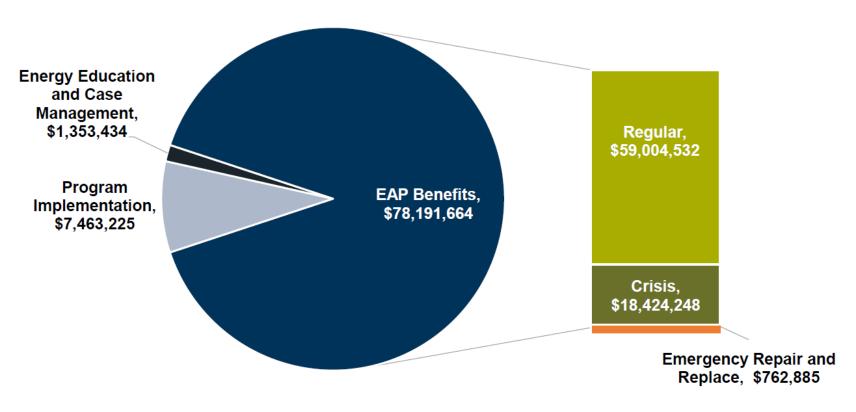
#### **EAP Monthly Progress**

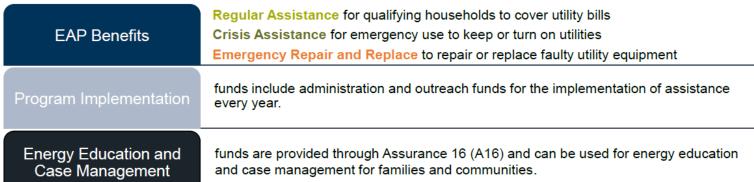


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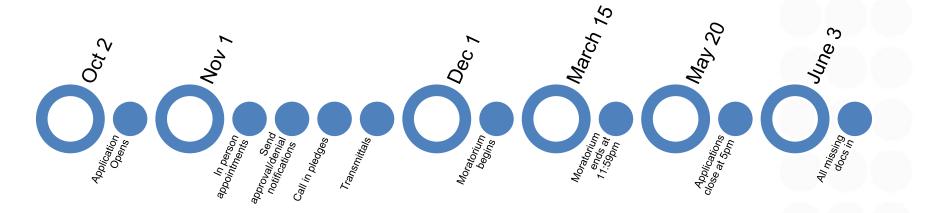
<sup>\*</sup> Applications submitted on time during EAP Year but not approved until after May 15th

#### Funding Spent as of July 3, 2023





### **EAP PROGRAM TIMELINE PY24**





#### **MUNICIPALITY POLICY**

- IHCDA understands that municipal entities are under different regulation than investor-owner, privately-owned, or cooperatively-owned utility providers, and that State Board of Accounts regulations preclude you from recording a monetary benefit to your register prior to receipt of the actual payment
- In spite of this, we do have a responsibility to ensure that all approved EAP applicants receive equitable treatment
- Therefore, in lieu of the requirement in the MOA that benefits are assessed to an approved applicant's account at the time of transmittal receipt, we are asking that Municipal Vendors incorporate a solution that achieves the same end result without running afoul of SBoA requirements and GAAP



#### **MUNICIPALITY POLICY**

- Due to SBoA requirements that supersede our MOA, municipalities will be exempt from the requirement to assess the benefits to a customer's account upon receipt of transmittal
- Municipal Vendors must ensure that the benefit amount is noted to an account at the time of transmittal receipt, even if it is not applied at that time
- Municipal Vendors must ensure that any penalties assessed to a customer account following a transmittal confirming a benefit are only assessed against the account balance remaining in excess of the benefit
  - For instance, if an applicant has a \$300 balance, and you receive a pledge for \$200, and the applicant fails to pay the next bill, penalties may only be assessed against the \$100 balance that exceeds the pending benefit



#### **MUNICIPALITY POLICY**

- Municipal Vendors should find a way to note on a customer's bill that the municipality has been informed of a pending benefit, and that it will be reflected on the bill upon receipt of payment
  - This will help with transparency for your customers and should result in greater piece of mind for low-income customers and reduced communication between the customer and both the Municipal Vendor and the LSP/IHCDA concerning the status of the benefit
  - Best practice recommendation would be that this note includes both the total amount of the benefit and the date on which the transmittal of the benefit was received



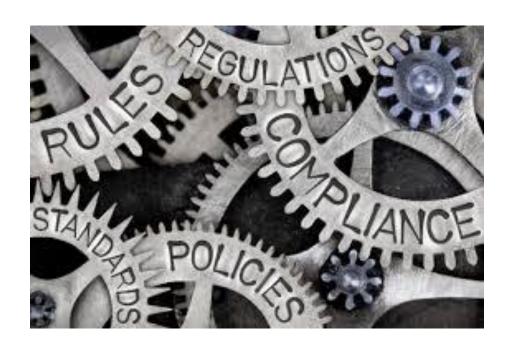
#### **QUESTIONS?**

Please don't hesitate to email us for clarity!





#### **OVERVIEW OF VENDOR GUIDE AND MOA**





#### **VENDOR GUIDE**

- The IHCDA EAP Vendor Guide is a resource that contains the information you are likely to need most frequently as an EAP Utility Vendor
- The Vendor Guide will be updated periodically to reflect current information, policies, and procedures
- It is posted on the IHCDA partner site at <a href="https://www.in.gov/ihcda/program-partners/energy-assistance-program-eap/">https://www.in.gov/ihcda/program-partners/energy-assistance-program-eap/</a>
- Vendors are encouraged to consult the Vendor Guide first when they have a question about policy or procedure



#### MEMORANDUM OF AGREEMENT

- MOAs are now issued for a two-year term instead of annually
- The most recent MOA takes effect on October 01, 2023, and it will expire on September 30, 2025
- MOAs have been sent out to contacts that we have on file through Adobe/Echosign
- If you have not received an MOA and you should have, please reach out to <u>Vendors@ihcda.in.gov</u>



#### **ACH AUTHORIZATIONS**

- ACH Authorization or Waivers will continue to be required annually
  - MOAs and ACH forms are issued electronically in Adobe Sign
  - In order to reduce paperwork and expedite this process, we require that all Vendors complete, sign, and submit documents digitally



#### **MOA UPDATES AND REQUIREMENTS**

 Next, we will cover several items in the MOA that have been updated or that we have seen issues with





#### **PY2024 VENDOR MOA QUICK CHANGES**

- Vendors are required to suspend disconnection action for 14 days while application is processed (outside of Moratorium protection)
- Vendors are now required to validate, sign, and return transmittal within 7 days
- Vendors are now required to use Overpayment and Refund Summary forms while returning funds
- We have an updated Equal Treatment Clause that requires explicit participation in any investigation into violations
- We have made several updates to language in the MOAs to make it more logical, concise, and clear



## AGREEMENT #3: VENDOR RESPONSIBILITY FOR OTHER LOCATION(S)

- Only the parent company needs to complete an MOA and ACH form if the deposit and W-9 information for other utility locations matches the parent company
- All locations must be listed on MOA Attachment B if they handle their own transmittals
- In order to streamline the management of Vendors, we are seeking to reduce the number of distinct MOAs and ACH Authorizations wherever possible
- In cases where payment goes to the same bank account, the locations should be grouped under the same parent organization for MOA purposes

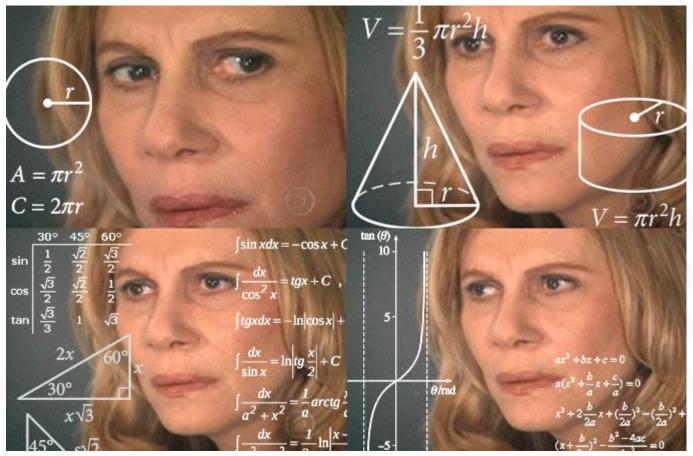


#### **AGREEMENT #5: COOPERATION**

- By signing the MOA, the Vendor agrees to cooperate with IHCDA and the Local Service Provider (LSP) regarding sharing information about EAP applicant accounts, including:
  - Energy consumption and cost
  - Payments
  - Disconnection prevention and restoration of service
  - Arrearage amounts
  - Account status
  - Other data related to EAP
- Collection of this data is federally mandated



#### PERFORMANCE MEASURES





#### PERFORMANCE MEASURES

- Collection of performance measures data is mandated by the LIHEAP statute
- Every year, we ask several Vendors to submit performance measures data, which includes providing annual energy usage and cost for all customers who have received LIHEAP benefits to cross-reference this data with our annual income calculations
- The purpose of performance measures data is to:
  - Demonstrate a reduction of energy burden
  - To assist IHCDA in crafting policy



#### **AGREEMENT #10: ACCEPTANCE OF PAYMENT**

- In accordance with state code, all payments must be made by an Electronic Funds Transfer (EFT)
- In order to be paid by check, the Vendor must meet both of the following conditions:
  - The Vendor does not have, and is unable to, establish a savings or checking account with a financial institution within the business's geographic area without payment of a service fee
  - The Vendor is able to provide a written statement from its financial institution confirming the inability to establish such an account, without paying a fee
- Claim approval and payment notifications will be sent via e-mail from reset@ihcda.in.gov



#### **AGREEMENT #12: UNALLOWABLE EXPENSES**

- EAP funds may not be applied to:
  - Deposits
  - Commercial accounts
  - Garbage collection or disposal
  - Water or sewer
  - Cable
  - Service or insurance plans
  - Repayment of fraud or theft losses
  - Setting an LP tank
  - Any expenses not directly related to residential energy consumption or delivery
- EAP funds must provide continuing service
  - A Vendor may not accept EAP funds for a closed or inactive account and apply them to an outstanding amount owed, unless the account will be restored



## AGREEMENTS #13 & #14: OVERPAYMENT AND REFUND SUMMARY FORM

Vendors now required use Overpayment and Refund Summary forms while returning funds

- Using these forms will make it easy and uniform for all Vendors to provide the information required with refunds
- Using these forms will immensely help our claims and fiscal staff in tracking and accounting for the returned benefits, while ensuring the funds are applied to the correct grant
  - This aims to reduce the waste of public taxpayer funds
- Using these forms will speed up benefit transfers when an applicant moves and has their benefit sent to a new utility or fuel provider



#### **OVERPAYMENT AND REFUND SUMMARY FORM**



#### **Utility Vendor Overpayment/Refund Summary**

Vendor name:	Check number:						
Date:	Remittance type (check one): Overpayment Refund						
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Energy Benefit Transfer Refund?	Account number	Applicant Name	Awarding Agency	Original Transmittal Number	Date Account Closed	Amount Awarded	Amount refunded
Yes No							
Yes No							
Yes No							
Yes No							
Yes No							
Yes No							
Yes No							
Yes No							
Yes No							
Yes No							

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#### **AGREEMENT #16: EQUAL TREATMENT**

- The Vendor shall not treat any household adversely because of EAP assistance
- Adverse treatment includes:
  - Charging additional rates, fees, costs, or other charges on the basis of a household receiving EAP benefits
- We have updated the Equal Treatment Clause to require explicit participation in any investigation into violations



#### AGREEMENT #22: RECORD KEEPING

- The Vendor agrees to maintain an adequate accounting system to allow verification and auditing of the amount of service delivered to eligible households
- This includes documentation that LIHEAP funds were not applied to unallowable costs and that refunds and overpayments were remitted to IHCDA rather than to the customer
- Records must be maintained for a period of three years following the close of a program year
  - For example, PY2023 records must be maintained until September 30, 2026



### **QUESTIONS?**









#### **MORATORIUM UPDATE**

- The Vendor may not, during the heating season, terminate service to the dwelling because of the failure of the customer to pay his energy or fuel bills until fourteen (14) days after it serves notice upon the customer of its intent to terminate service
- The Vendor cannot disconnect a client before March 15th of any year
- This update gives your clients time to apply for EAP



#### **MORATORIUM OVERVIEW**

- Indiana Code 8-1-2-121
  - Enacted by the Indiana General Assembly in 1983 (Last amended in 2006)
  - Ensures that electric and/or gas utility service is continued while eligibility is being determined for persons applying for LIHEAP assistance
- Effective from December 1<sup>st</sup> through March 15<sup>th</sup> of any year
- Applies to Utility Vendors who supply electricity or gas service
- Applies to Vendors that are municipally owned, privately owned, or cooperatively owned



- Allows for termination of services under the following circumstances:
  - Upon request of the customer of record
  - If a condition dangerous or hazardous to life, physical safety, or property exists
  - Upon order by any court, the IURC, or other duly authorized public authority
  - If fraudulent or unauthorized use is detected and the utility has reasonable grounds to believe the customer is responsible for such use
  - If the utility's regulating or measuring equipment has been tampered with and the utility has reasonable grounds to believe the customer is responsible for such tampering
- Note: A good practice would be to preemptively loop IHCDA into these situations



- Utility Vendors and LSPs will need to have good communication and foster productive partnerships in order to comply effectively with the moratorium requirements
- LSPs should be contacting the Vendor to extend moratorium protection prior to eligibility determination
  - However, Vendors are more likely to hear from the client themselves
- Clients should be given moratorium protection if they tell the Vendor that an application has been submitted
  - Vendors should trust the client and then verify with the LSP
- LSPs have 10 business days to complete application processing for in-person appointments, and 55 calendar days to complete application processing for other application methods



- LSPs should notify the Vendor when EAP eligibility has been determined so that a pledge can be entered, or moratorium protection can be terminated
- Vendors may contact the LSP to inquire about the status of an application that had been placed under moratorium protection while eligibility was being determined, especially if more than 10 days have elapsed since projected determination date
- Some Vendors extend this protection at the beginning of the EAP season
  - While the law does not require this, IHCDA appreciates the compassion and commitment to helping their customers



#### **TOOLS AND RESOURCES**

- Are there any tools or resources that would be helpful during moratorium?
- Is there anything anyone has implemented that has been helpful in communicating or ensuring applicants are protected?





Moratorium

**QUESTIONS?** 



### TRANSMITTAL PROCESS





- Transmittals will serve as the official record of the benefit for which a client has been approved
  - If there is a discrepancy between the pledge received via LSP contact and the amount on the transmittal, the transmittal amount will be considered correct
  - Transmittals are not valid for payment until they have been signed by both a representative of the LSP and a representative from the Vendor
  - Any changes made to the transmittal need to be made prior to execution
- All LSPs have been instructed to ensure that transmittals are generated and sent on at least a weekly basis



- It is the Vendor's responsibility to fully review the transmittal before signing it
- This review should include:
  - Ensuring that the client is a customer of the utility
  - Ensuring that the name, service address, and account number is correct
  - Ensuring the account is currently active and is not scheduled for disconnection at the customer's request
- If there are any errors or any accounts that need to be removed, it is the Vendor's responsibility to mark these changes directly onto the transmittal report and adjust the total amount, if necessary, before signing and returning the transmittal report to the LSP
- Vendors are required to return transmittals within 7 days
- Pledges must be applied at the time of transmittal. Some Vendors have agreements with their LSP to deliver fuel at the time of the pledge. We support this show of compassion for your customers
   Incda D

- If an LSP discovers an error has been made in benefit or eligibility determination, the LSP may award the client additional funds or submit a negative transmittal accompanied by an overpayment remittance
  - The LSP may award additional funds at any time
  - Overpayment remittances must be submitted within 60 days of initial approval
  - If an overpayment remittance is received more than 60 days following initial approval, you may inform the LSP that the window to request overpayment remittance has lapsed



- When a Vendor receives a negative transmittal, they are to follow the same transmittal procedure
- After returning the signed negative transmittal to the LSP, the Vendor will also sign the overpayment remittance
- The signed overpayment remittance is to be sent with a check to IHCDA to be reinvested in the program
- Vendors are justified to pass charges onto customer after returning any funds

## An overpayment occurs because:

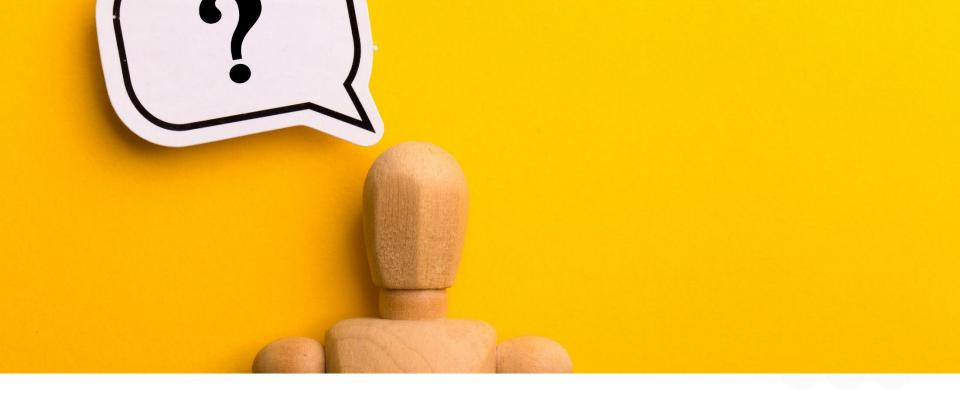
- 1. An applicant was accidentally awarded more funds than they were actually eligible for under the program rules
- 2. They were approved for benefits when they were in fact not eligible

Therefore, any delinquency caused by the removal of an overpayment from the customer's account becomes the customer's responsibility to pay



- In order to keep payments on time and not negatively impact customers/clients, we are asking all Vendors to return signed transmittals to LSPs within one week of receipt
- Claim notification e-mails will note which transmittals have been approved for payment and the total of each transmittal
  - Please use these e-mails in conjunction with the transmittal reports for the purposes of correctly distributing funds and reconciling claims
- Please remember that no LIHEAP funds are ever to be released back to the customer
  - All unused funds are to be sent back to IHCDA within 60 days of account closing





# **QUESTIONS?**



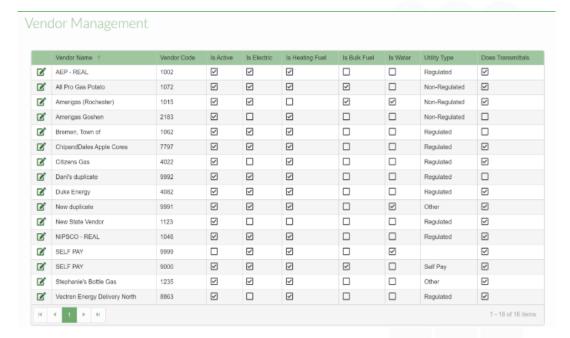
# USING THE VENDOR PORTAL AND VENDOR MONITORING





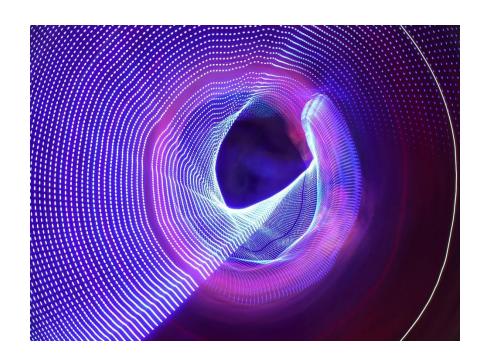
## **VENDOR PORTAL**

- The Vendor portal is now live and allows all transmittals to be sent, edited, signed, returned and monitored all online
- We have had mixed reception/utilization of this program
- We highly encourage moving to this system for its efficiency
- Transmittals send a notification email
- Link: <u>VendorEAPConnect</u>
   Login





## **VENDOR PORTAL**



- Vendors do need to opt in for access
  - Access can be granted from vendors@ihcda.in.gov
- We have some training materials that can be shared
- Henry can help troubleshoot and onboard!



## WHAT IS VENDOR MONITORING?

- The purpose of Vendor Monitoring is to ensure compliance with the LIHEAP program by the Utility Vendor
  - It is also an opportunity to improve processes and lets us know where areas of confusion or additional assistance are needed
- Vendor monitoring is a federally mandated component of the LIHEAP Statute as indicated on the MOA
- All Vendors that participate in the State of Indiana's LIHEAP are subject to Vendor Monitoring
- Monitoring will be conducted as a desktop review by the Vendor Analyst



# **VENDOR MONITORING PROCESS**

Vendors will be sent a 30-day letter notifying them of when the session is to begin.

Vendors will be required to submit requested documentation prior to the start of the monitoring session.

Vendors will be required to complete an Energy Utility Supplier Survey.

All vendors being monitored will receive an Assessment **Completion Report** within 30 days of IHCDA completing the desktop review.



## **VENDOR BEST PRACTICES**

- All Vendors should create written processes to promote consistency and program integrity
  - In turn, those processes can be submitted at time of monitoring to show the utility's processes and program compliance
- All Vendors should perform internal quality assurance audits on EAP customer accounts
- All Vendors should create a system to ensure that unallowable expenses are not being paid using EAP funds
- All Vendors should create a three (3) year record retention and destruction policy for all EAP documentation including electronic documentation
- All Vendors should strive to meet all reporting deadlines
  - This allows IHCDA to fulfill Federal Reporting requirements and make effective program changes





**QUESTIONS?** 



# FUEL FUNDS, SPECIAL PROGRAMS, AND ADDITIONAL RESOURCES





## **FUEL FUNDS AND SPECIAL PROGRAMS**

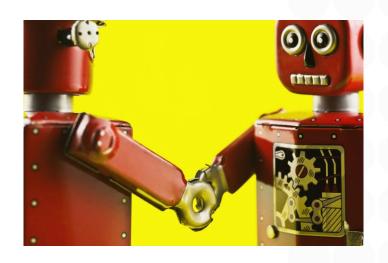
- Some Vendors have established private funds or other programs to offer additional assistance
- IHCDA encourages Utility Vendors to continue to look for innovative ways of offering additional benefits or programs to their struggling customers
- These can be developed independently or in collaboration with LSPs or other organizations
- If you would like to develop a special program or fuel fund, we encourage you to coordinate with IHCDA, INCAA or any LSPs for feedback and ideas!



## **OUTREACH AND PARTNERSHIP**

## Potential Ideas:

- Share payment arrangements and a copy of the bill to LSP
- Collect and send your LSP a list of at-risk homes before the season starts
- Marketing through local tv/radio/paper channels by partnering with LSP and IHCDA





## 2-1-1: A PRIMER

- Referring your clients to 2-1-1 is a great way to get them access to EAP and other resources
- 2-1-1 Can assist your client with starting an EAP application over the phone
  - Clients will still have to submit documentation to LSP

# Helping Hoosiers live better.

2-1-1 is a free and confidential service that helps Hoosiers across Indiana find the local resources they need. Dial 2-1-1 to connect with a navigator. We're here for you 24 hours a day, 7 days a week.



## 2-1-1 DOS AND DON'TS

- 2-1-1 does not have access to completed applications or their status once submitted
  - All questions should be directed to the LSP
- 2-1-1 does not process applications
  - They can only submit to LSP





## **OUTREACH AND PARTNERSHIP**

- What ideas do you all have?
- What partnerships are you working on that we can share?
- Where can we assist?



## **EAP INFORMATION ON VENDOR WEBSITES**

- Great way to share assistance information to your customers
- Please verify that your sites contain up to date and accurate information
- We have begun the process of reviewing Vendor partner websites to ensure accurate and up-to-date EAP information is provided
- If there is misinformation, we will reach out!



# VENDOR MARKETING **TOOLKIT**

- Marketing material and graphics are being updated for PY2024
- We are attempting to make this more accessible by placing them on our new and improved Vendor Partner page (once active, you will get the link)

## **ENERGY ASSISTANCE PROGRAM (EAP)**











#### WHAT IS EAP?

The Energy Assistance Program (EAP) can help you pay your heat and electric bills!

EAP assists you in paying for your energy bills by providing a one-time benefit assistance payment. An EAP benefit will not cover all of your annual heating and electric costs, so you should continue to pay your bills regularly.

These benefits are paid directly to the utility vendor to help cover your heating and electric costs. If your utilities are included in rent, you may still qualify for EAP.

Information about eligibility requirements can be found on eap.ihcda.in.gov.

IHCDA partners with Local Service Providers (LSP) across Indiana to assist individuals with completing the EAP application. LSPs process and determine eligibility for all applications.



Applicants can apply online, by mail, in-person, or by calling 2-1-1. To apply in-person or request a paper application form, applicants must contact their Local Service Provider.

For more information on which LSP serves your county and the link to apply online, visit http://eap.ihcda.in.gov.

### Documents Required:

- · Proof of US Citizenship or residency (Social Security card, Real ID, or other documents)
- · Photo ID for head of household
- · Proof of Indiana Residency (utility bill, applicant's Driver's license, or other documents)
- Proof of Income
- · Current utility bills or account
- · Landlord Affidavit or current Lease (for applicants with utilities in rent only)
- · LSP may require additional documents based on household circumstances

#### DISCONNECTION:

If you have received a disconnection notice for a metered utility, are within 10 days of running out of bulk fuel, or have already been disconnected or run completely out of bulk fuel, please notify your local service provider

Utility Programs: Many utility companies provide their own energy assistance to their clients. For more information, please contact your utility provider.

#### APPLICATION TIMELINE

Statewide EAP Program operates from November 1st - May 15th.



Application is submitted either online through 2-1-1. by mail, or in-person.



LSP determines eligibility. They have 55 days from when the application is received to determine e liaibility.



Once applicant is determined eligible their utility vendor is notified of the EAP benefit.



Utility Vendor applies EAP benefit to applicant's account.

### WHAT IS MORATORIUM?

The Moratorium law states that from December 1st through March 15th of any year, a regulated utility company may not turn off residential utility service to any customer who is eligible for and who has applied for the Energy Assistance Program.

Moratorium protection applies once a household submits an application. This protection applies to utilities that are electric or gas, including municipally owned, privately owned, or cooperatively



www.EAP.ihcda.in.gov

#### WEATHERIZATION

You may also be able to receive assistance through the Weatherization Assistance Program (Wx). Wx can provide improvements to your home to make it more energy efficient and safer.

If you are interested in Wx, you can get a referral through your EAP application by selecting yes to the question:

Would your Household be interested in a referral to the Weatherization Program?

# WHO SHOULD I CONTACT?





## **CONTACT PROTOCOLS**

- To help reduce confusion and streamline communication, you should ensure you are always communicating with the appropriate entity
- No Vendor representative should ever provide any IHCDA contact information directly to any customers, whether they are EAP recipients or not
  - This includes the EAP or Vendor Email or any IHCDA employee



## WHO TO CONTACT

### LSP

- Questions about a specific client/household
- Questions about a benefit
- Questions about submission of transmittal
- Confirming application status
- Notification of suspected customer meter tampering or unauthorized use when the customer is an EAP client or applicant

### **IHCDA**

- Questions about payment that you are unable to answer after review of your transmittals and claim approval e-mails
- Questions about moratorium or MOA terms
- Problems getting information from LSPs
- Follow-up on a refund or **Energy Benefit Transfer**
- Suspicion of fraud/misconduct at LSP level

## Assistance for Clients

- All referrals to LIHEAP from the vendors should be made to the appropriate LSP or 2-1-1.
- 2-1-1 or http://in211.communityos.org
- Customers may be referred to http://eap.ihcda.in.gov for more detailed information or to apply online.



## **NEW VENDOR EMAIL**

- We have created a dedicated email to triage issues for Vendors
  - vendors@ihcda.in.gov
  - The IHCDA Fiscal Department is separate from EAP and does not have access to this mailbox
  - You may still hear from <u>Liheap@ihcda.in.gov</u>



# **QUESTIONS?**





## **NEXT STEPS**

Thank you for attending this training and the hard work you complete to help make EAP successful for the State of Indiana!

- If you have questions or concerns, please reach out to vendors@ihcda.in.gov
- EAP resources page: LINK
- Vendor Portal link: <u>VendorEAPConnect Login</u>



## STAKEHOLDER ENGAGEMENT PROJECT

- IHCDA has partnered with Transform Consulting Group (TCG) to conduct stakeholder engagement and research to inform future design upgrades to technology, specifically around the EAPConnect data system and the Vendor Portal
- We would like to hear your thoughts on how you utilize the Vendor Portal currently, as well as what technology upgrades or design features you would like to see that would make it more effective in your role
- If you do not currently use the Vendor Portal, that's okay! We are still
  interested in your thoughts about why that might be, and what you would like
  to see change in order to incorporate it into your work
- Your feedback is critical!



## PLEASE TAKE SURVEY

- Your participation in this survey is greatly appreciated and your responses will remain confidential
- The survey will take about 15 minutes to complete https://www.surveymonkey.com/r/IHCDAUtilityVendors

