INTRODUCTION

The following program instructions are required protocols for delivering Energy Assistance Programs (LIEAP & OEAP) in Multnomah County (MC).

These instructions are written to supplement the state (OHCS) manuals and to ensure that energy assistance in Multnomah County is provided in a consistent manner across the County. The manual's purpose is to provide information and instructions for personnel involved in the administration and delivery of the program. Agencies are required to follow the protocols in the current manual as interpreted by Multnomah County. Agencies are responsible for following the guidelines with the manual, even those not expressly noted by Multnomah County. Agencies are expected to contact Multnomah County for clarification, regarding ambiguous, conflicting or confusing procedures and protocols within the current manual.

WORK PLANS

Sub-recipient agency is required to submit a work plan to the County on how the energy assistance program will be implemented in the sub-recipient's service district. The work plan will be the document that governs the work of each agency.   Work plans should clearly delineate staffing patterns, operational procedures, customer service procedures, hours of operation, training, and how program monitoring will occur for both LIEAP and OEAP.

Performance Measure: Draft agency plan must be submitted no later than **August 15, 2007**. Written, final approval of the work plan must be received by the agency no later than **September 30, 2007** in order to begin (continue) receipt of energy assistance funds. Work plans will be submitted each year, following this schedule.

Staffing
Agency staffing must have enough capacity to handle the amount of contacts for the service district. Sub-recipient agency staff should be available to attend and staff events that the County deems appropriate for marketing the energy program. Such events may include but are not limited to media and marketing events, Energy Fairs, Neighborhood and Community Fairs, energy assistance intake sessions at hotels and apartment complexes. In addition, staff may need to be available for radio and television interviews, video taping for public and community cable TV, taping for public radio, and interviews with

local and regional newspapers. Sub-recipient agency may negotiate with the County on how staffing will occur.

Calendar At A Glance (Additional calendar in manual)

Year round	OEAP applications
Quarterly (January, April, July, October)	▪ Written notice of allocation by fund type.
Each month	▪ Coordinators' meeting ▪ Invoicing the County for program delivery payments.
Daily	▪ Application bundles and Log Sheets sent to THE COUNTY
Spring	▪ State LIEAP/OEAP program wrap up meeting. (Spring Meeting) ▪ County begins year end closing and reconciling agency reimbursements (June) ▪ Contract renewals ▪ Intake Worker Training
Summer	▪ Contract renewals ▪ Year end closing and reconciling agency reimbursements completed ▪ Work Plans submitted/approved. ▪ Intake Worker Training
Fall	▪ LIEAP Outreach ▪ State LIEAP program start-up (Fall Meeting) ▪ Annual OPUS Training for New Staff ▪ Annual Renewal of OPUS/Intake Authorization forms.
Winter season (October-March, depending on funding and Federal budget approval)	▪ LIEAP opens for general public December 1st. ▪ Agency Monitoring (February-April)

MEETINGS

Multnomah County will facilitate a monthly Energy Coordinator's meeting and the OHCS hosts two statewide energy assistance meetings. **Agency Energy Assistance Coordinators are expected to attend.**

Performance measure: Sub-recipient agency staff are expected to attend monthly Multnomah County Energy Coordinators' meetings and State Oregon

Housing and Community Services trainings (Including both the Fall & Spring State meetings.).   Representatives at these meetings must have agency responsibility and authority to update the County on agency activities that impact the Energy Assistance program.   They are also responsible to communicate information back to their agency.   Multnomah County will monitor agency participation. Expected attendance rate for monthly meeting is a minimum of 80%. All agencies must attend Fall & Spring State meetings.

APPLICATION PROCESSING

Applications should be complete, accurate and meet the criteria set forth in the current state Operations manual, as interpreted by Multnomah County. In addition, agencies will be expected to comply with interpretations and changes that may come up within the program year and communicated in writing from Multnomah County.   This may include those changes placed within the meeting summaries from monthly coordinator's meetings.   When issues arise while the County is processing applications, this information will be passed on to the appropriate agency energy assistance coordinator. Applications that require changes by Multnomah County staff or are unable to be processed will be "Problem Applications".

Problem Applications
There are two (2) types of *"problem applications".*
- For applications that cannot be processed, a daily list (Corrective Action Request) will be prepared for each agency and emailed for clarification and direction. Agencies are expected to respond with in 3 working days with direction, clarification or correction.   When circumstances demand, (end of program year, etc) the timeframe may be shorter. If, after 3 working days, applications are not corrected, the agency will be sent a "Corrective Action Notice", Multnomah County staff will contact the utility to cancel the commitment and will deny the application in OPUS.
- Applications that require County staff to make changes within OPUS are also *"problem applications".* Changes will be documented and a report submitted to agencies.

"Corrective Action Request" and "Corrective Action Notice": The *"Corrective Action Request"* is the notice sent by the County energy office to the community agency seeking clarification and/or direction for applications that were unable to be processed in OPUS. The *"Corrective Action Notice"* is sent after the 72-hours have expired, since the *"Corrective Action Request"* was sent, and the application in question could not be completed. This notice will describe the steps Multnomah County has taken regarding the application and direct the agency to communicate appropriately with the applicant.

Performance Measure: County staff will monitor and track all energy assistance vouchers, including the *"problem applications"*. Numbers and type of *"problem applications"* will be collected, as well as whether agencies meet the 3-day time requirement. Agencies are expected to meet the 3-day time limit. Numbers of *"problem applications"* are not to exceed 2 per any single log sheet and/or 3% during a program year. Targets will be established each program year.

Timely Submission of Applications
It is expected that all applications processed by local agencies will be entered into OPUS within 72 hours of intake. This includes those directly entered, from the LIEAP mailing, outreach events and home visits. Once entered into OPUS, application "bundles" must be submitted to Multnomah County within 5 working days, for review and payment approval. *"Intake"* is defined as the time when an energy assistance application is complete, signed and dated by an agency intake staff person.

Utility Commitment: The utility is to be contacted for a commitment of funds for every application. This can be done by phone, fax or email, depending on the utility and the needs of the applicant. Only applications with a 5-day shut-off or less should be phone into the utility. Agency staff should make these commitments and note date on application. Applicants should not be making utility commitments. The utility payment commitment is not to be made unless an application is authorized. Any changes to the commitment must be communicated to the appropriate utility.

Application Bundle: An application bundle consists of the original application, all documents used for income verification, the utility bill and a log sheet covering all applications sent to the County. When an applicant has "heat included in rent", the landlord letter should be included.

Performance Measure: Log sheets received by Multnomah County will be date stamped upon receipt. The intake date of individual applications will checked against this date to determine whether they meet the time limit. All applications on log sheets are to have been entered into OPUS within 24 hours of log sheet date. Utility commitments will be randomly checked. Commitments should never be made before intake date and less than 1% should be made before authorization signature. All energy assistance vouchers will be tracked for compliance with the various timelines for processing.

Authorization / Intake Signature Forms
All energy applications must have two valid agency signatures for the County to consider the application properly authorized, per Energy Assistance Manual. Applications without two approved signatures will not be processed, and become *"problem applications",* subject to corrective action.

Sub-recipient agency must provide the County with an up to date LIEAP/OEAP Authorization and Intake Worker Signature Form in September of each year, and when new staff is hired. The intake form must be completed for intake staff/volunteers, and the authorization form must be completed for designated staff that review and authorize customer applications. These forms should be updated as staff/volunteers or designations change with the original sent to the County. All agency-staff using OPUS must also be approved by the agency. Minimum requirements for intake and OPUS use include completion of a County approved intake worker training, OPUS data-entry training, completed forms K and OPUS user and confidentiality forms. The intake training is a prerequisite for the OPUS training.

INTAKE/APPLICATION PROCESS

- Multnomah County expects that every applicant for energy assistance, whether by phone, mail or in person will be treated in a courteous and professional manner.
- Agency phone messages and other communication should be timely, and easy for applicants to understand.

- When a client contacts sub-recipient agency in any manner they should be given an explanation of application process and a pre-screening. Clients should be given an appointment (fund dependant) with one contact, whether by phone or in person. Persons leaving a phone message should receive a contact within 48 hours. Applicants must have a way to gain access to agency personnel, in a potential shut off or crisis situation.

- Applications should be complete, accurate and meet the criteria set forth in the current state Operations Manual, as interpreted by Multnomah County.

- Real-time OPUS data-entry is the preferred method of serving energy assistance applicants. All applications **must** be entered into OPUS within 72 hours. All applications other than real-time OPUS data-entry, and LIEAP mail out, should have an explanation for using process other than direct entry.

- Agencies must use the voucher numbers assigned to them by Multnomah County. There are separate numbers for direct entry, mailing and outreach.

- If information is missing prior to a completed intake, the intake worker informs applicant and puts paperwork in pending status. The applicant is to be given 15 working days to get the required information before the application is voided. The applicant must be sent a "Notice of Action". **The intake worker should <u>not</u> sign an incomplete application.** A pre-

screening process will help ensure that applicants are prepared to have their applications completed.

- If application is complete, the intake worker signs form, lists applicant on daily log, then forwards application to an authorized signer for authorization. When applicant is found to be not eligible, the Intake Worker must review the application with Energy Assistance Coordinator and sends a denial letter (with information on hearing rights) to client. Agency will maintain a file of denial applications. Applications in OPUS should not be "voided" by agency staff.   If agencies deem a "void" a correct action, they should contact Multnomah County. Applications in OPUS that cannot be processed should be "denied".   All denied and voided applications in OPUS <u>must</u> have an appropriate comment.

- Authorized signer reviews applications, signs to authorize, and keeps unduplicated list of assigned voucher numbers. Applications without the authorized signature will be determined as "problem applications".

- After applications are authorized, utilities are contacted to make a commitment. Please note this on the application (Initials & date).

- All utility commitments are to made by agency staff and <u>not</u> by applicants.

- For every crisis payment there <u>must</u> be an appropriate comment on the application. This should include reason for crisis payment, amount of the bill, and the amount needed to alleviate the crisis. Lacking this information will cause applications to be "problems" and delay payment approval.

- For every "direct pay" payment there <u>must</u> be an appropriate comment on the application. This needs to include an explanation of why a direct payment was made to the applicant rather then to a utility. If paying for previously purchased energy, the receipts must be included.

- Once entered into the OPUS, application "bundles" must be submitted to Multnomah County within 5 working days, for review and payment approval.

- The energy assistance coordinator is responsible for tracking of agency program payment allocation spend-down on a daily basis. This information is available in OPUS.

    Performance measure: Customer service and application issues will be monitored as part of agency site visits and the daily processing of applications.   "Secret shoppers" and consumer complaints will monitor customer service issues. A minimum of 50 applications per program will be reviewed. While the goal is 100% accuracy, no more than 10% should have

problems and 5% with major problems, such as income, eligibility, missing signatures, missing documentation issues.

TRIBAL RELATIONSHIPS

The following tribes are in our service area (Multnomah County) and receive LIHEAP funds directly from the Federal government:
- The Confederated Tribes of the Grande Ronde
- The Confederated Tribes of Siletz

In order to ensure our compliance with State requirements, restricting eligible tribal households to a single LIEAP payment and to avoid duplication of service, we will use the following procedure:

- During the application/intake process applicants choose to identify their race.
- If *"Native American"* is checked for any member of the household, they are asked if they are members of either of the two tribes listed above.
- If not, move on with the application.
- If they answer in the affirmative, they are asked a follow-up question. "Is this member an **enrolled** member of the tribe?"
- If not, move on with the application.
- If someone in the household is an **enrolled** member of one of these two tribes they are referred to the proper tribe for LIEAP assistance or they may be served with other energy assistance resources if eligible.

NOTE: This procedure is only for LIEAP services. There are no restrictions for receiving OEAP assistance.

CONFIDENTIALITY

Clients receiving energy assistance in Multnomah County not only have rights concerning the confidentiality of information they share with us, but the expectation that agencies and the County are doing everything possible to protect those rights.

- Only use the minimum personal information necessary to complete an application.

- Do not place personal, medical, or legal information on an application or in the file.

- It is only necessary to confirm a disability. Do not include personal medical information in the file or as a comment on the application.

- If back-up material is supplied by the applicant and includes inappropriate information (such as school records, birth certificates, medical information, etc), please note that you have seen information necessary to complete the application and the remainder was destroyed due to confidentiality issues.

- Any confidential documents not included in an applicant file should be returned to the applicant or properly destroyed.

- All staff using OPUS must have a current "User Policy, Responsibility, & Code of Ethics form on file with the County.

- When staff leaves the employ of an agency or no longer uses OPUS, agencies must notify the OPUS Administrator at Multnomah County as soon as possible. MC will remove that name from OPUS access, in order to help assure client confidentiality.

  Performance Measure: Confidentiality issues will be monitored as part of agency site visits and the daily processing of applications. Files should be 100% free of inappropriate confidential information.

CLIENT ELIGIBILITY

Sub-recipient agencies must ensure that every qualified applicant wishing to apply for assistance will be served:

- Eligible Households - Households whose verified earnings are at or below 60% of the State's median income and are fully or partially responsible for their home heating expenses are eligible.

- Agencies need to calculate income carefully to ensure applicant eligibility. These calculations should be a part of the income verification documentation.

- Applicants must be informed of eligibility requirements and should be given at the time appointments are made with clients.

- Eligible applicants will be informed of their benefits at their intake appointment.

- If the application is mailed in, applicants must receive a written response explaining the outcome of their application, including their benefits.

- Applicants must be informed of the fair hearing process if assistance is denied or delayed. *A copy of the "fair hearing process" must be posted in an area visible to all clients.*

- Applicants who are determined ineligible must be told verbally and also given a letter denying the eligibility and the procedure for a fair hearing.

- Sub-recipient agency staff should assist a client who wants to appeal a decision.

- Eligible applicants shall be informed of any change in their benefits.

Performance Measure: Eligibility issues will be monitored as part of agency site visits and the daily processing of applications. All applications reviewed should reflect eligible applicants and a proper use of eligibility standards.

Access to services offered through the energy assistance network needs to be equal for all eligible residents in Multnomah County. It is appropriate for households seeking services to be able to receive service from an agency that meets their unique needs. They may seek service from a given agency for a variety of reasons, (location, cultural preference, school where children attend, near work, to name a few). While the County and the SUN System in particular, have set a priority service focus on families with children, this is not meant to be to the exclusion of single people who qualify for anti-poverty services. Funding sources stipulate that it is illegal to discriminate in service provision based on race, ethnicity, family status and geography.

No Wrong Door Practice:

There are three basic components to implementation of this practice. When approached for assistance, the agency may do one or more of the following:

1) Provide appropriate services for the household

2) Direct to a more convenient service provider
   - There are situations when it might be appropriate to suggest another service provider. Examples of these include locations closer to the households address with transportation issues, language barriers, or a more suitable service. However, it is essential to make certain that there are appropriate resources available at that location before referring a client. In other words, this does not mean offering a list of phone numbers where the referring agency knows until the referring agency has confirmed that services are available on the other end.

3) Problem solve with the individual to ascertain if there may be other assistance available or no assistance available

- If the particular assistance sought by the individual is not available, it is appropriate to discuss other possibilities that may help the household

Remember: This process is guided by the preferences of the applicant. They decide which "door" to enter, when applying for services. The agency may help them with that choice, but ultimately the choice is theirs.

PROGRAM MONITORING

The purpose of the Program Monitoring is to ensure that agency operations are meeting State, Federal, and County requirements for the program. It is usually scheduled in February/March of each year as a prelude to the State audit. The types of things reviewed at the site monitoring will be much the same as a state audit. We will be looking at client applications for eligibility issues, thoroughness, supporting documentation, and program protocols.

Performance Measure: While we view the program monitoring as an opportunity to provide technical assistance and to provide for continued quality improvement, agencies will be required to make appropriate changes/improvements as noted in the monitoring report. The report will give timeframes for correction.

PROGRAM PERFORMANCE STANDARDS AND CUSTOMER SERVICE EXPECTATIONS REVIEW

Sub-recipient agencies are expected to follow the policies and procedures in the Operations and Intake Manuals and the Program instructions from Multnomah County. Agencies will be monitored for compliance with these instructions, including, but not limited to the following:

- Following proper procedures in determining eligibility, and crisis payments. This includes over & under serving applicants.

- Accuracy and completeness of applications, including files with proper support materials.

- Timeliness of application submission and "problem application" follow-up.

- Adherence to the "No Wrong Door Policy".

- Respecting applicant confidentiality.

- Serving applicants in an efficient, respectful, courteous and professional manner.

- Proper billing procedures and monitoring expenditures for accuracy.

- Tracking expenditures to ensure that energy assistance accounts are not overspent.

PROGRAM DELIVERY PAYMENTS

Agencies will be paid for allowable expenditures up to the total allowable by the grant over the program year. The Multnomah County grant is based on a 21.2% rate/cap for LIEAP, and a 17.6% rate/cap for OEAP. These percentages were established by the State after sub-recipient agency budgets were submitted, scrutinized, and established by the State. This rate will remain until the end of this program year. This budget worksheet process will be repeated before the next program year. Agencies <u>may</u> be paid for allowable expense over the rate/caps but <u>cannot</u> be paid more than the actual allowable expense.

Agencies will use the approved **2007 Program Delivery Payment Request form**. This request form will require the submission of monthly expenditures for each program area (LIEAP, OEAP-PGE, and OEAP-PPL). There will be no requirement to provide information regarding program allocation, commitments, etc. Payments will use the amount authorized and approved for payment each month and not the amounts committed each month. This information is available to each agency in OPUS ("Batch Transactions).

It will include a section for water application billing, to be placed on the LIEAP payment billing form.