

CONTRA COSTA COUNTY EMPLOYMENT & HUMAN SERVICES DEPARTMENT  
COMMUNITY SERVICES BUREAU

# POLICIES AND PROCEDURES

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## SECTION 4-LOW-INCOME HOME ENERGY ASSISTANCE PROGRAM

**2017-19**

Policy Council Approved: 05/17/17  
Board of Supervisors Approved: 08/15/17

2017-19  
Policies and Procedures  
Section 4: Low-Income Home Energy Assistance Program

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## A. Introduction

### 1. Program Overview

The Low-Income Home Energy Assistance Program (LIHEAP) is a federally-funded program that assists low-income households with their utility bill. Eligibility is based on the household's total monthly income that is provided by Department of Community Services and Development on a yearly basis. This assistance is targeted to households with low income and high energy costs, taking into consideration households with elderly, disabled persons, and children under six. The amount of assistance is based on the number of household members, total gross household income, the cost of energy within Contra Costa County and funding availability.

In addition to helping with a household's utility bill, LIHEAP offers free weatherization. Weatherization is the process of making a household more air tight and energy efficient. Weatherizing a home can help lower a household's energy usage and utility costs.

### 2. Types of Assistance Available

#### i. Utility Assistance

HEAP: Pay the amount eligible of an applicant's utility bill.

Fast Track: LIHEAP funds are available in case of a crisis/emergency situation. Staff is required to resolve an energy crisis situation within forty-eight (48) hours and a life threatening energy situation within eighteen (18) hours.

#### ii. Weatherization Assistance

Weatherization: The weatherization program provides services designed to reduce heating and cooling costs to improve the energy efficiency of a home, while safeguarding the health and safety of the household. Weatherization is supported through the partnership with Department of Conservation and Development (DCD).

ECIP EHCS: LIHEAP funds are available to low-income families in case of a crisis/emergency situation. DCD staff is required to resolve an energy crisis situation within forty-eight (48) hours and a life threatening energy situation within eighteen (18) hours.

### 3. Service Center Locations

- i. LIHEAP Utility Assistance: 1470 Civic Ct. [Ste-Suite 200](#), Concord, CA 94520, Phone: 925-681-6380, Fax: 925-229-6784
- ii. Weatherization Assistance: 30 Muir Rd, Martinez, CA 94553, Phone: 925-674-7214, Fax: 925-646-9339

## B. LIHEAP Eligibility Guidelines

### 1. General Guidelines

Applications are received via mail, email, fax, or drop-in. Applicants for all utility assistance and/or weatherization programs must meet the following for eligibility:

- Must be 18 years of age or older
- Be a resident of Contra Costa County
- Meet the definition of a household
- Housing unit must meet the definition of a dwelling
- Provide proof of citizenship or alien status
- Meet the income guidelines and provide proof of income from all sources for all members of the household.
- Be responsible for energy costs and provide copies of utility bills
- Receive energy/budget counseling
- Meet agency's priority plan
- Submit all applicable documentation to complete application process. Other eligibility requirements for Fast Track Assistance/ECIP EHCS/SWEATS must be submitted.

### 2. Household Composition

An eligible household is defined as an individual or group of individuals, related or unrelated, who share residential energy and have an energy cost.

Ineligible households for utility assistance consist of the following:

- Subsidized households that do not pay any out of pocket energy costs.
- Persons living in licensed facilities (nursing homes, assisted living, etc.).
- Temporary shelters or group homes with residents who have no energy expense or who pay a nominal fee to live there.
- Single room dwelling, within a larger dwelling and the single room dwelling is not considered a separate household.
- Persons who have no physical address.
- Individuals who previously received Utility Assistance (UA) in another LIHEAP household during the same program year are considered ineligible household members to receive services. However, his/her income is counted in the household's total income.
- Applicants under the age of 18 who are not legally emancipated and do not have a parent or legal guardian to apply on their behalf.

Ineligible households for weatherization consist of the following:

- Persons living in licensed facilities (nursing homes, assisted living, etc.).
- Persons who reside in only one room within a larger dwelling and is not considered a separate household.

- Persons who have no physical address.
- Applicants under the age of 18 who are not legally emancipated and do not have a parent or legal guardian to apply on their behalf.

The following exceptions on ineligible household members apply to both Utility Assistance and Weatherization:

- Live-in Attendants - Individuals who reside within a household to provide necessary medical services and whose services are paid for in part or in full by a third party.
- Persons living in multi-unit buildings - If a building contains more than one housing unit, but has only one meter or tank that is shared by all the units, each unit may contain a separate household if each one functions as a separate economic unit (also known as submetered).
- A person out of the home for reasons of employment, education, hospitalization, etc., who continues to support or be supported by the unit and who intends to return to the unit, will remain a member of the household.
- A dependent child who is a student living away from his/her primary residence to attend an educational facility is considered to be a member of the primary residence.

### **3. Housing Unit Must Meet the Definition of a Dwelling**

Housing unit must meet the definition of a dwelling in order to be eligible for assistance. Below are examples of a housing unit that are considered an eligible dwelling:

- A housing unit is a house, an apartment, a mobile home, a group of rooms, or a single room that is occupied (or if vacant is intended for occupancy) as separate living quarters.
- All dwellings must be a permanent building and located in Contra Costa County. Applicants can have a mailing address in another county/state, but the location where they receive utility services must be in Contra Costa County.
- Applicant must complete the Intake Form CSD 43

The following housing units are considered ineligible dwellings:

- Applicants renting a room in someone else's home (Exception: applicant provides proof that his/her living arrangement adheres to the definition of "separate living quarters")
- Applicants living in transitory, tent or temporary encampments
- Applicants living in board-and-care facilities, nursing or convalescent homes, or in jail or prison
- Applicants that are homeless

There are exceptions on dwelling eligibility and staff may need to review the list below to determine if a housing unit is eligible for assistance. Below is a list of the exceptions:

- Applicants living on boats, in a marina with a dock number and utility hook-up, are eligible for Utility Assistance.
- Applicants living in mobile homes or RVs are ineligible for energy and weatherization services unless they meet the following criteria:

- I. The dwelling must not be mobile (i.e., wheels have been removed, attached porch, etc.).
- II. The dwelling must have resided in the same location for a reasonable length of time.

#### 4. Citizenship and Alien Status

Applicant must be a permanent and legal United States resident and complete a Statement of Citizenship or Non-Citizen Status for Public Benefits Form (CSD 600). Federal law requires that all public agencies verify that an applicant is a United States (U.S.) citizen, national, or an alien in a qualified immigration status. A copy of the documentation to verify their qualified status must be retained in the applicant file. An individual is a U.S. citizen if:

- Born in the U.S. regardless of the citizenship of his/her parents
- Born outside of the U.S. to U.S. citizen parents
- Born outside of the U.S. of alien parents and has been naturalized as a U.S. citizen. A child born outside of the U.S. of alien parents automatically becomes a citizen after birth if his/her parents are naturalized before he/she becomes age 16
- U.S. territories that include: American Samoa, Guam, the Northern Mariana Islands, Puerto Rico and the Virgin Islands.

Applicants must submit acceptable verification of their citizenship and/or alien status. The following is a list of acceptable verification:

- U.S. birth certificate
- U.S. passport
- Naturalization certificate, N-550 or N-570. Certificate cannot be copied, but agency should review, verify and document in the file that the “naturalized certificate was “verified and valid”
- Report of birth abroad of a U.S. Citizen FS-240
- U.S. Citizen Identification Card, I-197
- Certificate of Citizenship, N-560 or N-561
- Statement provided by the U.S. consular officer certifying the individual is a U.S. citizen
- American Indian card with a classification code KIC
- Documentation of direct receipt of SSI or SSA benefits
- DD 214 – Military Separation – This document must show a U.S. place of birth.
- [REAL ID Card](#)

Applicants who are ineligible to participate in the utility assistance and/or weatherization programs with public agencies are:

- Individuals who hold an INS I-94 who are admitted as temporary entrants (such as students, visitors, tourists, diplomats, etc.).
- Aliens who have no other INS document.
- Individuals possessing an Individual Taxpayer Identification Number (ITIN). An ITIN does not create an inference regarding the person’s immigration status. An ITIN is issued by the U.S. Internal Revenue Service to individuals who are required to have a U.S. taxpayer identification number but who do not have, and are not eligible to obtain, a Social Security Number issued by the Social Security Administration.
- Individuals possessing an ID card issued by a foreign consulate

- ~~AB 60 Driver's License~~ California Driver's licenses and identification cards with that includes a "Federal Limits Apply" ~~issued prior to January 22, 2018~~ designation.

### 5. Income Guidelines

Applicants must meet the income guidelines provided by Department of Community Services and Development each program year. Staff must obtain income documentation supporting the total gross monthly income earnings stated on the Energy Intake Form (CSD 43). Income documentation for all household members must be within 6 weeks of the application intake date, and must comply with the stated acceptable forms of income documentation referenced below.

Countable Income includes:

Income Type	Definition
Annuities, Pensions, Retirement	Includes Rail Road retirement
Assistance payments	Retirement Survivor Disability Insurance, Supplemental Security Insurance (SSI), General Assistance, Cal Works
Business income	Income from business, less business operational expenses
Capital gains or losses	For self-employment only
Cash gifts (regular basis)	Must provide regular support for an individual or for the family
Child support	Include child support for the household receiving it
Declaration of personal income	Irregular income resulting from occasional sources such as yard work, childcare, collecting cans/bottles, donating blood/plasma
Dividends, Interest & Royalties	If withdrawn
Foster care payments	Include foster care payments received for foster children or foster adults living alone.
Government Employee Pensions	
Insurance or annuity payments	Military family allotments, Military retirement
Jury duty pay	
Military pay	
Payment from government sponsored programs	Such as agricultural programs
Payment on behalf of the household	Must provide regular support for the family
Railroad Retirement	
Social Security Benefits	Net amount of the check, excluding the amount deducted for Medicare
Spousal support	
Strike benefits	
Training allowances	From Federal and State Employment programs, only the portion that pays or reimburses for living expenses
Tribal payments from casinos	Per capita payments
Trust disbursements	Regular
Unemployment insurance	
Veteran's Benefits	

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Wages, salaries, commissions, bonuses, profit sharing, tips, vacation pay, severance pay, sick leave, royalties and honoraria which result from the applicant's work or service	Count all gross income received for the period used to determine income eligibility
Worker's compensation	

Applicants claiming no income must reveal their source(s) of support. If there is zero income reported; Certification of Income And Expenses Form (CSD43B) must be completed by the applicant and included in the file. If applicant is reporting zero income for a consecutive year, a Certification of Income And Expenses form will need to be completed by the applicant PLUS include documentation of monthly expenses (a letter from the person/agency that supports the applicant's rental, food and/or utility expenses). An example of documentation can be a print out of applicant's food stamps, a letter from housing authority, a declaration from the person that supports the applicant's rental expenses. Staff must obtain written or verbal verification of regular support from others reported on the form. Eligibility will be based on documentation submitted with the form or verified during the follow-up.

For DOE only: All applicants applying for Department of Energy (DOE) services with zero income may complete a self-certification after all avenues of documenting income eligibility are exhausted. Evidence of the various attempts at proving eligibility must be contained in the applicant file, including a notarized statement signed by the applicant that they have no other proof of income. If 120 days pass and the applicant's income eligibility for DOE needs to be re-established, they will follow the same "Zero Income Notarization" rules that apply to an applicant entering through the DOE program. On an exceptional basis, if Weatherization staff cannot obtain a notarized self-certification statement, Weatherization will follow their policies and procedures for next steps.

## 6. Utility Bill

Applicants must be responsible for energy costs and provide copies of utility bills. Utility bill(s) must contain a billing period of at least 22 days and be current and within 6 weeks of the application intake date. Documentation such as a [photo](#) identification [and the completion of Account Holder Authorization and Consent Form \(CSD 081\)](#) is required if name on the account is different from the name on the Energy Intake Form (CSD 43). The person on the utility account must be at least 18 years of age or older. The utility bill must provide the amount of the household's current energy costs and the following:

- Service address - In rural areas, the service address can be descriptive (Example: 3rd house on the left, past the gas station, etc.)
- Account number
- Name of the utility company
- Customer's name
- The dollar amount of a full month's energy costs (at least 22 days), some exceptions may apply.
- Fast Track applications: The documentation must include the total amount due on the bill (current and past due and all other charges). Applicants must include in addition to current monthly utility bill, a past due, 15 day, 48 hour, or shut off notices.

The following are considered unacceptable utility bill verification:



- Closing bills
- Altered bills
- Service address on the utility bill does not match the applicant's service address
- Outdated utility bill
- Deposit accounts or accounts in collections
- Business / Commercial Accounts
- Bill Less than 22 days

When the applicant is attempting to establish service at a new address and changes from the old account are transferred to the new account, CSB will make an exception and accept utility bill. This will also apply when applicants are trying to re-establish services on a closed account (due to non-payment) at the same address, which has no current charges. The issue date of the bill is to be used to determine if it is current. Since the service period will not be current, the current energy charges for that utility will be set to zero on the application. When re-establishing service on a closed account, staff must correspond with the utility company to verify the applicant is re-establishing service. LIHEAP assistance can only be provided when the service is re-connected. LIHEAP cannot be used to pay for an outstanding balance on a closed account if a new account is not established.

To qualify for services when utilities are included in the rent, the applicant must submit documentation that must include the following:

- Date
- Tenant/Customer's Name
- Service Address
- The amount of rental charges covering energy expenses
- Landlord's signature
- Photocopied and faxed letters of utility cost verification

Staff must keep a dated copy with a wet signature on file for each multi-family dwelling. Letter must contain service address, date, and the location of the original signature.

This document may be photocopied for insertion into the applicant's file of other tenants in that building. A newly signed landlord letter must be obtained each program year.

Acceptable Documentation must be current to six weeks from intake date and may include one of the listed documents below:

- Original or faxed letter signed by landlord/manager
- Rental receipt that indicates utilities included in rent
- HUD statement showing zero utility allowance

### **7. Energy/Budget Counseling**

Applicants must complete Client Education Confirmation of Receipt Form (CSD 321) verifying of energy conservation education and/or budget counseling were provided by staff.

### **8. Priority Plan**

Applicants must meet CSB's priority plan (for Utility Assistance Only) or meet DCD's priority plan (for Weatherization, LIWP and DOE). CSB will make every attempt to assist the vulnerable population with the lowest income and highest energy cost.

Vulnerable population consists of:

- families in the household who have children 5 years or younger
- elderly members (60 years or older)
- have a permanent and/or temporary disability

Documentation of vulnerable population must be in applicant's file.

Please note: Staff is not required to obtain written documentation to verify disability for any disabled household members, however, it will be to the discretion of staff to request it from the applicant, should it be reasonable.

#### **9. File Documentation**

All applications must have the following documents in their file:

- Energy Intake Form (CSD43)
- Statement of Citizenship or Non-Citizenship Status for Public Benefits (CSD 600)
- Provide a copy of a current monthly utility bill plus any past due notices if applicable
- Copies of the total gross monthly income for ALL household members 18 years and older
- If applicable, Certification of Income and Expenses (CSD 43B)
- Client Education Confirmation of Receipt (CSD321)
- If Applicable: Birth Certificates or documentation verifying any children ages 0-5 in the household and ID required for any household members 60 years or older.
- If Applicable: Account Holder Authorization and Consent Form (CSD 081)

#### **10. Utility Bill Balances for Utility Assistance**

Applicants with a credit balance on their account that is more than double the monthly gas and electric charges must re-apply when the credit balance has been exhausted. A denial notice will be mailed to the applicant.

HEAP or Fast Track payment must bring applicants to zero balance. If payment doesn't bring the balance to zero, the applicant must first make a co-payment to their utility company before a pledge can be made. Proof of payment must be verified by our staff to the utility company prior to pledge being made. On a case by case basis for Fast Track, if the utility bill is higher than the eligible amount, but the eligible amount is sufficient to avoid services being shut off; the application will be processed. If there was an agreement made to avoid services in being shut off between the applicant and their utility company, staff must document the agreement in the applicant's file. All Fast Track applications will be pledged by staff to the utility company. A pledge is defined as a promise to pay from LIHEAP to utility company.

## **11. Incomplete Applications**

Once the application is received via fax, mail, walk-ins or email, an acknowledgement letter has to be sent within 15-days of the intake date. Review the application and if there are any missing items to complete the application process, identify the document(s) that are still missing. Staff will complete the following:

- i. Complete the Missing Documentation Letter. The letter indicates that our agency will give the applicant ten (10) working days to submit the requested missing documentation requested in order to process application. The form will have HEAP's fax number if they choose to fax it to our office. If applicant does not submit the requested documentation within the timeframe given, their application will be denied. Missing Documentation Letter will have:
  - Applicant's full name
  - Appropriate box(es) checked of the missing documents
- ii. Staff will print two (2) copies of the Missing Documentation Letter (one to be mailed to the applicant and the other to retain with the file).
- iii. Incomplete file will be placed in the file cabinet labeled Pending Files drawer.

## **12. Incomplete Fast Track Applications**

If there are any missing items to complete the application process, identify the document(s) that are still missing. Staff will do a courtesy call to applicant to discuss and request missing documentation. Staff will follow up with completing the Missing Documentation letter giving the applicant ten working days to submit the missing documentation requested in order to process application (please see steps 1-3 above).

Upon receiving missing documentation, the application will still be processed as Fast Track. If applicant makes a payment arrangement with PG&E to avoid disconnection after submitting an application, staff will honor the application as a Fast Track.

When an applicant does not submit the requested documents within the timeframe given, staff will mail a denial letter for Incomplete Applications (see procedures for Denial Letters For Incomplete Applications).

## **13. Ineligible and Denied Applications**

If an application is ineligible for HEAP or Fast Track services, notification of ineligibility will be mailed in writing. Reasons for ineligibility may include, but are not limited to:

- Agency is out of funds
- Facts concerning applicant's eligibility/income calculation are in dispute
- Household does not meet the agency's priority plan (and no disputed facts concerning applicant's eligibility could impact plan determination)

Reasons for denial may include, but are not limited to:

- Exceeds maximum income guidelines
- Missing or insufficient information
- Household already served

All “DENIED” applications shall receive written notification explaining the reason for the denial and advising the applicant of their rights to appeal. Provide the applicant 10 working days if needed and the opportunity to submit additional information needed to prove eligibility.

A letter describing the reason for their ineligibility/denial will be mailed to the applicant and one placed in their file. Denial letters will include an appeal notice (LIHEAP APPEAL FORM).

### C. Appeal Procedure

#### 1. General Description

Contra Costa County residents are entitled to apply for assistance from the Low Income Home Energy Assistance Program (LIHEAP) with their energy cost. The LIHEAP program is funded by the state and federal government, and is administered by the State Community Services and Development Department in Sacramento.

Our goal at Contra Costa County Community Services Bureau is to serve the applicant, the best we can. If the applicant has provided all the necessary documentation and meets the income and program guidelines for service they will be approved for assistance.

In the event the application has been denied for assistance; the applicant has the right to appeal that decision. The applicant may complete and submit the LIHEAP APPEAL FORM that is mailed along with the denial letter. The applicant has within ten (10) working days from the date of the denial letter to complete and submit it to the office. They may provide any additional proof to determine eligibility.

Upon receiving the LIHEAP APPEAL FORM, it will then be forwarded to a staff where he/she will review the LIHEAP APPEAL FORM along with any additional proof submitted by the applicant to determine eligibility. After reviewing the information submitted, the staff will either overturn the denial and process the application or agree with the denial. If the application was approved, the applicant is notified by letter within five (5) working days of the approval of the application. However, if denial stands, the staff will forward the LIHEAP APPEAL FORM along with his/her notes of the review to the next designated staff.

The next designated staff will review the information and either overrule the staff’s decision or agree with the current decision. Applicant is notified by letter with the LIHEAP APPEAL FORM within five (5) working days of the decision. The next designated staff will scan the decision letter along with the supporting documents into the HEAPAPPs Folder under PY Appeals Folder.

If applicant does not agree with the decision made by the designated staff, the applicant may complete another LIHEAP APPEAL FORM. The LIHEAP APPEAL FORM will then be forwarded to the Program Manager where he/she will review the information and either overrule the designated staff’s decision or agree with the current decision. Then applicant is notified by letter within five (5) working days of the Program Manager’s decision after his/her review.

If satisfaction is not reached, the applicant still has the option to appeal at the State level by contacting the Department of Community Services and Development in Sacramento, CA by writing to:

California Department of Community Services and Development  
2389 Gateway Oaks Drive, Suite 100  
Sacramento, CA 94833  
(866) 675-6623

#### **D. LIHEAP/Fast Track Complaint Procedure**

- Any complaints are to be handled immediately by staff who receives the complaint.
- Any complaints that cannot be resolved by the first contact staff in a reasonable amount of time are to be passed to the next designated staff.
- If the complaint cannot be resolved at this level; it will be forwarded to the Assistant Manager or designee

Upon resolving the complaint, a written dated account is to be made and filed in the complaint log.

#### **E. Weatherization Referrals**

##### **1. General Description**

After the interview process is complete and the applicant is eligible for Utility Assistance, staff will ask and offer weatherization for the applicant's homes. Staff will ask if they are renters or homeowners. Staff will explain that weatherization will improve their home to make it more energy efficient. This could include windows, doors, caulking, weather stripping, heaters, water heaters, stoves, refrigerators and more. All work conducted by weatherization is done at NO COST to landlords with eligible tenants, or eligible property owners.

##### **2. Weatherization for Rental Units**

If the applicant is renting, they must first ask their landlord to fill out and sign the Energy Service Agreement for Rental Units and Post Weatherization Lead Forms. This is giving the weatherization program permission to go in the home and perform an assessment of the measures needed and perform the weatherization work. The Post Weatherization Lead Form is the only item not paid by the program and the cost is between \$200 and \$400. If the landlord does not wish to pay this they can select wish not to pay and sign the form.

##### **3. Weatherization for Home Owners**

If the applicant owns the home and is eligible for services the applicant can fill out and sign the Energy Service Agreement for Owner and Post Weatherization Lead forms. This is giving the weatherization program authorization to inspect and perform an assessment of the measures needed and perform the weatherization work. The Post Weatherization Lead Form is the only item not paid by the program and

the cost is between \$200 and \$400. If the owner does not wish to pay this they can select 'wish not to pay and sign the form.

Staff will provide to applicant the Weatherization Forms upon applicant's interest, which includes the following:

- i. For Rental Units:
  - Weatherization Program Checklist for HEAP clients
  - Energy Service Agreement for Rental Units
  - Energy Service Agreement for Rental Units – Mechanical Ventilation
  - Energy Service Agreement for Rental Units – Wall Insulation
  - Post Weatherization Lead Presence Test
  - CSD Form 081 Client/Customer Consent Form and Authorization
  
- ii. For Owner Occupied Units
  - Weatherization Program Checklist for HEAP clients
  - Energy Service Agreement for Owner Occupied Units
  - Energy Service Agreement for Owner Occupied Units – Mechanical Ventilation
  - Energy Service Agreement for Owner Occupied Units – Wall Insulation
  - Post Weatherization Lead Presence Test
  - CSD Form 081 Client/Customer Consent From and Authorization

After the forms are completed and signed by the applicant, the applicant must send all documents to the Weatherization office by email at [Weatheri@dcd.cccounty.us](mailto:Weatheri@dcd.cccounty.us), mail to 30 Muir Rd., Martinez, CA 94553, visit the weatherization website (<http://www.contracosta.ca.gov/4336/Weatherization>) or fax at (925) 646-9339. As soon as the Weatherization Program receives the forms, the Weatherization office will contact HEAP to request the applicant's LIHEAP application. At that time, staff will fax the documents to the Weatherization Program. As soon as the Weatherization Program has a completed application; it will then be reviewed and all eligible applicants will be contacted to start the weatherization home improvements. This will ensure the applicant's home is more energy efficient and will save money on their utility bill.

## F. LIHEAP and DOE Deferrals

### 1. Purpose

Employees of the Contra Costa County LIHEAP Programs and Department of Energy (DOE) Weatherization Program have the right and responsibility to provide services in a safe and effective manner without undue hazard to intake and assessment staff, installation crews, inspectors, and the households we serve.

### 2. Scope

Employees of the Contra Costa County LIHEAP Programs and DOE Weatherization Program are to adhere to the California Department and Development of Community Services' (CSD) Deferral Policy when determining eligibility for LIHEAP Programs or DOE Weatherization services up to and including denial of any and all services.

### 3. Description

The Contra Costa County LIHEAP Programs and DOE Weatherization Program staff will consult with the Program Manager when any of the following potential deferral conditions are created:

- Any act that that is physical or verbal abuse; or
- Any threatening behavior or action which is interpreted to carry the potential to:
  - Harm or endanger the safety of others;
  - Result in an act of aggression; or
  - Destroy or damage property.

Items to report may include, but not limited to:

- Verbal abuse/Foul Language;
- Falsification of Information;
- Harassment;
- Feeling unsafe or uneasy while working with an applicant;
- Threatening Violence
- Detection of Substance Abuse; or
- Discrimination

What should staff do if this occurs at the LIHEAP front desk or no Manager is available?

- If this situation occurs in the front desk and the applicant is not cooperating, contact the manager to calm the situation.
- If the applicant's behavior is threatening to staff or manager, LIHEAP has the right to refuse service and ask them to leave the office and close the main door for safety.
- Applicant's application will not be accepted for eligibility.
- A panic button is available under the front desk counter; it can be pressed if staff is feeling unsafe while working with an applicant. Once the button is pressed, an alert will be sent to the Sheriff Department in which they will show in approximately 15 minutes.

In addition, the Contra Costa County Weatherization Program complies with the California Department and Development of Community Services' (CSD) Deferral Policy requirements that:

- Weatherization agencies are required to take all responsible precautions against performing work on homes that could subject workers or applicants to health and safety (H&S) risks.
- Applicants must be informed about identified problems and safety concerns, and the reason why weatherization services must be deferred.
- The decision to defer work in a dwelling, or in extreme cases, to provide no weatherization

services, is difficult but necessary in some cases.

- Decision to defer must take place upon discovery, or as soon as practicable. This does not mean that assistance will never be available, but that work must be postponed until the problem(s) can be resolved. Deferrals do not have an “expiration date”.

The Contra Costa County Weatherization Program staff will consult with the Program Manager when any of the following potential deferral conditions are found:

- Applicant has a health condition that would be made worse by weatherization.
- Home’s mechanical, electrical, or plumbing system is in such despair that failure is imminent/not correctable within the program.
- Home is condemned, under rehabilitation, or applicant’s “hoarding” and/or structural issues make full assessment and/or diagnostic tests not feasible.
- Moisture issues are so severe that they cannot be fixed under Minor Envelope Repair.
- Combustion appliance safety or Indoor Air Quality fail exists that cannot be reasonably corrected within program parameters.
- Lead-based paint present that would create hazard if disturbed.
- Applicant is uncooperative, abusive, or threatening to weatherization team members.
- Illegal activities are taking place in the home.

The Contra Costa County LIHEAP Programs and DOE Weatherization Program has a Zero Tolerance policy that prohibits illegal activity and/or inappropriate behavior towards staff or subcontractors. Such use of abuse/foul language, intimidating actions (including belligerent emails and voicemails), physical harassment, destruction of property, threats to staff, etc., will be documented and will lead to termination from the program and future Deferral from services.

## G. Quality Assurance:

### 1. General Description

To ensure quality control is being met, staff will conduct random file review of a minimum of ~~25~~20 files per month.

### 2. Procedures

Staff will use the Utility Assistance Quality Control File Review form to conduct the file reviews. Any errors found in the file, will be corrected in RED and documented on the file review form. The Utility Assistance Quality Control File Review form will be collected from staff and used as a tool for the Program Manager or designee to identify any trends or errors for training purposes.

Program Manager or designee shall update the Utility Assistance QA File Review Results. The Utility Assistance QA File Review Results shall be saved by month to monitor the progress or trends.

### 3. File Review between Community Services Bureau and Department of Conservation and



## Development

To ensure quality control is being met between agencies, CSB and DCD will monitor each other's application files at least on a quarterly basis.

## H. Confidentiality

### 1. General Description

When a Contra Costa County employee or an applicant to whom an employee has a relationship with is applying for the LIHEAP program, the application is considered Confidential.

### 2. Procedures

Applications considered Confidential will be handled by the assigned staff or designee. Assigned staff or designee will review and determine eligibility. Program Manager or designee must review and sign off on the application before application is processed by assigned staff. All confidential applications will be kept locked in a filing cabinet of which only designated staff will have access to.

## I. FRAUD

### 1. General Description

Staff who have a good reason, supported by documentary evidence or firsthand knowledge, to suspect that an applicant, utility company employee, another agency, etc, is knowingly, by means of misrepresentation, obtaining, attempting to, or assisting someone else to obtain benefits for which the applicant is ineligible, should report such concerns to an appropriate supervisor.

### 2. Procedures

Fraud is defined as a crime involving a material representation relating to a past or an existing fact which is: false; made with knowledge of its falsity; or in reckless disregard of the truth made in order to obtain a benefit or something of value. Factors to be considered may include, but not limited to:

- Whether the incorrect or unreported information affects eligibility
- Whether the correct information was, in fact, known to the applicant
- Whether the applicant fully understood the eligibility requirements and their responsibility for reporting information
- Whether material facts were deliberately/intentionally altered or withheld

Staff can evaluate the information provided by applicants and request additional information when reasonably necessary to verify income and their eligibility factors. The agency may deny services if the information appears to be insufficient or contradictory, and give the applicant an opportunity to appeal. If the applicant has a fraud case with PG&E for any illegal activity, the application will be denied. They can reapply once their PG&E account is in good standing.