

**Fiscal Year (FY) 2025 Low Income Home Energy Assistance Program (LIHEAP)
Model Plan
Responses to Public Comments During 30-day Comment Period**

Note: Comments highlighted in blue had already been received in the 60-day public comment period and addressed prior to submission to OMB.

Oregon Comments	FY 2025 Model Plan	Decision/Comments
<p>1.4a Program Components: (Definition of Categorical Eligibility)</p> <p>This feels like more of a compliance question than something for the Model Plan.</p>	<p>1.4a - Add a text box “Provide your definition of categorical eligibility. Please explain how households are categorically eligible (i.e. do all household members need to receive the benefits or just one member, is there a data exchange in place?) and how categorical eligibility streamlines the LIHEAP application process. This will ensure grant recipients understand categorical eligibility and answer the question appropriately</p>	<p>The Model Plan will not be updated as it serves as the plan how grant recipients are to meet the 16 statutory assurances.</p>
<p>1.10a Program Components: (Online applications)</p> <p>Q- Do we have an online application?</p> <p>A- No, we do not. However, some local service providers do. If this is asking us to describe each one and provide a link to each one, that’s unreasonable. And time-consuming.</p>	<p>Add: 1.10a If yes, describe the type of online application (Select all boxes that apply)</p> <ul style="list-style-type: none"> • A PDF version of the application is available online and can be downloaded, filled out and mailed in for processing. • A state-wide online application that allows a customer to complete data entry and submit an application electronically for processing • One or more locally available online applications that allows a customer to complete data entry and submit an application electronically for processing 	<p>This comment was addressed in the 60 day public comment period as follows: The Model Plan Form will be updated based on the following suggested edits:</p> <p>i. Box 1: Question specifies that online application is mailed in for processing. Expand to include other types of submission such as fax, e-mail, in-person, etc.</p> <p>ii. Box 3: Clarify definition of “locally available” – at subgrantee office?</p> <p>iii. Box 6: Replace “a link” with “links” to account for multiple subgrantee online</p>

	<ul style="list-style-type: none"> • Online application that is also mobile friendly • Other, please describe • If any of the above boxes are checked, please include a link here: 	processes.
<p>1.12 Program Components: (In-person appointments)</p> <p>This seems to be requiring detailed information about each of our sub-grantees that do in person appointments. If so, that's unreasonable and time-consuming.</p>	<p>Do you or any of your subrecipients require in person appointments in order to apply (Yes/No) If yes, please provide more information</p>	<p>This comment was addressed in the 60 day public comment period as follows: The Model Plan Form will not be updated based on this comment because by asking this question, we are able to determine if the grant recipient is doing the necessary outreach and ensuring customers can apply in all ways possible (i.e., is the in-person appointment requirement causing an undue burden on applications being processed in a timely manner). Are they ensuring crisis assistance is being provided within the required timeframe. Section 2604(c) Of the funds available to each State under subsection (a), a reasonable amount based on data from prior years shall be reserved until March 15 of each program year by each State for energy crisis intervention. The program for which funds are reserved by this subsection shall be administered by public or nonprofit entities which have experience in administering energy crisis programs under the Low-Income Energy Assistance Act of 1980 or under this Act, experience in assisting low-income individuals in the area to be served, the capacity to undertake a timely and effective energy crisis intervention program, and the ability to carry out the program in local communities. The program for which funds are reserved under this subsection shall-- (1) not later than 48 hours after a household applies for energy crisis benefits, provide some form of assistance that will resolve the energy crisis if such household is eligible to receive such benefits;</p>

		<p>(2) not later than 18 hours after a household applies for crisis benefits, provide some form of assistance that will resolve the energy crisis if such household is eligible to receive such benefits and is in a life-threatening situation; and</p> <p>(3) require each entity that administers such program--</p> <p>(A) to accept applications for energy crisis benefits at sites that are geographically accessible to all households in the area to be served by such entity; and</p> <p>(B) to provide to low-income individuals who are physically infirm the means--</p> <p>(i) to submit applications for energy crisis benefits without leaving their residences; or</p> <p>(ii) to travel to the sites at which such applications are accepted by such entity.</p>
<p>4.18 Crisis Assistance: (Disaster response)</p> <p>This seems to be more of a “what-if” question, asking us to look into the future. Disaster response is very complicated and is typically coordinated statewide. Also seems to be more of a compliance question.</p>	<p>Add: Question that says: Do you intend to utilize LIHEAP crisis funds to address disaster related crisis situations? “Yes” or “No” if yes, describe Add hover over box that states “OCS’ block grant funding has built in flexibility to support grant recipients in disaster response. Please visit https://ocs-emergency-assistance-hhs-acf.hub.arcgis.com/ for additional information” (508 compliant hyperlink)</p>	<p>This comment was addressed in the 60 day public comment period as follows:</p> <p>The Model Plan will be updated, and the question edited to add, if the grant recipient experience a natural disaster or if they intend to use LIHEAP crisis funds to address disaster related crisis situation.</p>
<p>8.5d asks us to include a detailed list of local service providers</p> <p>I can see the value, but this does not belong in the Model Plan.</p>	<p>Include a current list of subrecipient(s) name, main office address (do not list P.O. Box), phone number, county(s) served, Congressional District, and UEI number.</p>	<p>The Model Plan will not be updated based on this comment. A current listing is needed to provide outreach assistance through the National Energy Assistance Referral (NEAR) website in directing customers to local administrative agencies for assistance.</p>
<p>9.5 Energy Suppliers: (Vendor agreement)</p>	<p>Add: Option at the end of the section to attach a copy of the vendor agreement.</p>	<p>This comment was addressed in the 60 day public comment period as follows:</p>

In Oregon, the vendor agreement is between the local service provider and the utility/fuel vendor. Is this saying we have to attach a copy of them all? Again, this is unreasonable, time consuming, and is more of a compliance question. It does not belong in the Model Plan.

The Model Plan will be updated based on this comment to indicate they attach a copy of the template of the state-wide agreement and/or policy that indicates local agreements must adhere to state-wide policies and assurances.

If the grant recipient does not have a copy of the vendor agreement, how to they ensure the vendor is adhering to the state-wide requirements and the LIHEAP statutes and regulations.

Modify question
Assurance 7: Section 2605(b)(7)
if the State chooses to pay home energy suppliers directly, establish procedures to--

- (A) notify each participating household of the amount of assistance paid on its behalf;
- (B) assure that the home energy supplier will charge the eligible household, in the normal billing process, the difference between the actual cost of the home energy and the amount of the payment made by the State under this title;
- (C) assure that the home energy supplier will provide assurances that any agreement entered into with a home energy supplier under this paragraph will contain provisions to assure that no household receiving assistance under this title will be treated adversely because of such assistance under applicable provisions of State law or public regulatory requirements; and
- (D) ensure that the provision of vendor payments remains at the option of the State in consultation with local grantees and may be contingent on unregulated vendors taking appropriate measures to alleviate the energy burdens of eligible households, including providing for agreements between suppliers and individuals eligible for benefits under this Act that seek to

		<p>reduce home energy costs, minimize the risks of home energy crisis, and encourage regular payments by individuals receiving financial assistance for home energy costs; Also, 2605(b)(10) and 45 CFR 96.30</p>
<p>10.1 & 10.1a Program, Fiscal Monitoring and Audit: (Fiscal accounting and tracking funds)</p> <p>I do not think these belong in the Model Plan. In fact, all of Section 10 seems to be more appropriate for compliance than the Model Plan.</p>	<p>Revise the question as, “how do you ensure proper fiscal accounting and tracking of funds?” Add the following instructional sentence, be specific about tracking of grant award, tracking of expenditures, tracking vendor (benefit) refunds, fiscal reporting process, and fiscal software system being used. Clarification for grant recipients.</p> <p>10.1a New Question: Provide your definitions of the following:</p> <ul style="list-style-type: none"> • Obligation (insert explanation box) • Expenditures (insert explanation box) • Expenditure timeframe (insert explanation box) • Administrative costs (insert explanation box) 	<p>This comment was addressed in the 60 day public comment period as follows: The Model Plan Form will not be updated based on this comment because the scope of the model plan is to ensure the grant recipient is adhering to the federal LIHEAP assurances in order to receive funding. These basic details are needed to ensure the grant recipient is adhering to those requirements. Also, there are uniform federal guidance from OMB that grant recipients must adhere to, including but limited to risk assessment and monitoring of subgrant recipients. Responses to these questions can be an effective T&TA tool to prevent future monitoring findings, including single audit disallowances. 2605(b)(10) and 45 CFR 96.30</p>
<p>10.2a Program, Fiscal Monitoring and Audit: (Auditor selection process)</p> <p>This more appropriate for compliance that the Model Plan.</p>	<p>Add question: If yes, describe your auditor selection process.</p>	<p>The Model Plan Form will not be updated based on this comment because the scope of the model plan is to ensure the grant recipient is adhering to the federal LIHEAP assurances in order to receive funding. These basic details are needed to ensure the grant recipient is adhering to those requirements. Also, there are uniform federal guidance from OMB that grant recipients must adhere to, including but limited to risk assessment and monitoring of subgrant recipients. Responses to these questions can be an effective T&TA tool to prevent future monitoring findings, including single audit disallowances.</p>

		2605(b)(10) and 45 CFR 96.30
<p>11.6 Timely and meaningful public participation: (Public participation and input)</p> <p>This is a loaded question and is a setup for conflict. In Oregon, the entire plan was developed with public input. If we made no specific changes, it appears that we did not consider public input.</p>	<p>11.6 What changes did you make to your LIHEAP plan as a result of public participation and solicitation of input?</p>	<p>The Model Plan will not be updated with this change. This question was not changed in the FY25 Model Plan changes and will continue to be asked as a part of compliance with assurance 12 <i>“provide for timely and meaningful public participation in the development of the plan“</i> and 42 U.S.C. 8624.</p>
<p>Section 22 Attachments: (Optional attachments)</p> <p>Policy manuals and subrecipient contracts seem to be more appropriate for compliance than the model plan.</p>	<p>Attachments</p> <ul style="list-style-type: none"> • Add optional attachment section for the following items: Policy Manual; Subrecipient Contract; Model Plan Participation Notes for Tribes 	<p>The Model Plan will not be updated with this comment. Requesting the Policy Manual and Subrecipient contract is optional.</p> <p>The purpose of the question is to determine how grant recipients are administering the program and to ensure each local subgrant recipient is adhering to state-wide policies. Grant recipients are providing this assurance, which means they are aware of how local subgrant recipients are administering their programs.</p>