

**LOW INCOME HOME ENERGY ASSISTANCE PROGRAM (LIHEAP)**

**DETAILED MODEL PLAN**

**PUBLIC LAW 97-35, AS AMENDED  
FISCAL YEAR (FY) 2011**

**GRANTEE:** State of Oregon  
**EIN:** 1-99-059-2162-A4  
**ADDRESS:** Department of Oregon Housing and Community Services  
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**PLEASE CHECK ONE:**    **TRIBE**     **STATE**     **INSULAR AREA**

Department of Health and Human Services  
Administration for Children and Families  
Office of Community Services  
Washington, DC 20447

**August 1987, revised 05/92, 02/95, 03/96, 12/98, 11/01**  
**OMB Approval No. 0970-0075**  
**Expiration Date: 10/31/2008**

THE PAPERWORK REDUCTION ACT OF 1995 (Pub. L. 104-13)

Use of this model plan is optional. However, the information requested is required in order to receive a Low Income Home Energy Assistance Program (LIHEAP) grant in years in which the grantee is not permitted to file an abbreviated plan. Public reporting burden for this collection of information is estimated to average 1 hour per response, including the time for reviewing instructions, gathering and maintaining the data needed, and reviewing the collection of information. An agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless it displays a currently valid OMB control number.

**The State of Oregon agrees to:**

(1) use the funds available under this title to--

(A) conduct outreach activities and provide assistance to low income households in meeting their home energy costs, particularly those with the lowest incomes that pay a high proportion of household income for home energy, consistent with paragraph (5);

(B) intervene in energy crisis situations;

(C) provide low-cost residential weatherization and other cost-effective energy-related home repair; and

(D) plan, develop, and administer the State's program under this title including leveraging programs,

and the State agrees not to use such funds for any purposes other than those specified in this title;

(2) make payments under this title only with respect to--

(A) households in which one or more individuals are receiving--

(i) assistance under the State program funded under part A of title IV of the Social Security Act;

(ii) supplemental security income payments under title XVI of the Social Security Act;

(iii) food stamps under the Food Stamp Act of 1977; or

(iv) payments under section 415, 521, 541, or 542 of title 38, United States Code, or under section 306 of the Veterans' and Survivors' Pension Improvement Act of 1978; or

(B) households with incomes which do not exceed the greater of—

(i) an amount equal to 184 percent of the poverty level for such State; or

(ii) an amount equal to 60 percent of the State median income;

except that a State may not exclude a household from eligibility in a fiscal year solely on the basis of household income if such income is less than 110 percent of the poverty level for such State, but the State may give priority to those households with the highest home energy costs or needs in relation to household income.

(3) conduct outreach activities designed to assure that eligible households, especially households with elderly individuals or disabled individuals, or both, and households with high home energy burdens, are made aware of the assistance available under this title, and any similar energy-related assistance available under subtitle B of title VI (relating to community services block grant program) or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;

(4) coordinate its activities under this title with similar and related programs administered by the Federal Government and such State, particularly low-income energy-related programs under subtitle B of title VI (relating to community services block grant program), under the supplemental security income program, under part A of title IV of the Social Security Act, under title XX of the Social Security Act, under the low-income weatherization assistance program under title IV of the Energy Conservation and Production Act, or under any other provision of law which carries out programs which were administered under the Economic Opportunity Act of 1964 before the date of the enactment of this Act;

(5) provide, in a timely manner, that the highest level of assistance will be furnished to those households which have the lowest incomes and the highest energy costs or needs in relation to income, taking into account family size, except that the State may not differentiate in implementing this section between the households described in clauses 2(A) and 2(B) of this subsection;

(6) to the extent it is necessary to designate local administrative agencies in order to carry out the purposes of this title, to give special consideration, in the designation of such agencies, to any local public or private nonprofit agency which was receiving Federal funds under any low-income energy assistance program or weatherization program under the Economic Opportunity Act of 1964 or any other provision of law on the day before the date of the enactment of this Act, except that—

(A) the State shall, before giving such special consideration, determine that the agency involved meets program and fiscal requirements established by the State; and

(B) if there is no such agency because of any change in the assistance furnished to programs for economically disadvantaged persons, then the State shall give special consideration in the designation of local administrative agencies to any successor agency which is operated in substantially the same manner as the predecessor agency which did receive funds for the fiscal year preceding the fiscal year for which the determination is made;

(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 reduce home energy costs, minimize the risks of home energy crisis, and encourage regular payments by individuals receiving financial assistance for home energy costs;

(8) provide assurances that,

(A) the State will not exclude households described in clause (2)(B) of this subsection from receiving home energy assistance benefits under clause (2), and

(B) the State will treat owners and renters equitably under the program assisted under this title;

(9) provide that--

(A) the State may use for planning and administering the use of funds under this title an amount not to exceed 10 percent of the funds payable to such State under this title for a fiscal year; and

(B) the State will pay from non-Federal sources the remaining costs of planning and administering the program assisted under this title and will not use Federal funds for such remaining cost (except for the costs of the activities described in paragraph (16));

(10) provide that such fiscal control and fund accounting procedures will be established as may be necessary to assure the proper disbursement of and accounting for Federal funds paid to the State under this title, including procedures for monitoring the assistance provided under this title, and provide that the State will comply with the provisions of chapter 75 of title 31, United States Code (commonly known as the "Single Audit Act");

(11) permit and cooperate with Federal investigations undertaken in accordance with section 2608;

(12) provide for timely and meaningful public participation in the development of the plan described in subsection (c);

(13) provide an opportunity for a fair administrative hearing to individuals whose claims for assistance under the plan described in subsection (c) are denied or are not acted upon with reasonable promptness; and

(14) cooperate with the Secretary with respect to data collecting and reporting under section 2610.

(15) \* beginning in fiscal year 1992, provide, in addition to such services as may be offered by State Departments of Public Welfare at the local level, outreach and intake functions for crisis situations and heating and cooling assistance that is administered by additional State and local governmental entities or community-based organizations (such as community action agencies, area agencies on aging and not-for-profit neighborhood-based organizations), and in States where such organizations do not administer functions as of September 30, 1991, preference in awarding grants or contracts for intake services shall be provided to those agencies that administer the low-income weatherization or energy crisis intervention programs.

(16) use up to 5 percent of such funds, at its option, to provide services that encourage and enable households to reduce their home energy needs and thereby the need for energy assistance, including needs assessments, counseling, and assistance with energy vendors, and report to the Secretary concerning the impact of such activities on the number of households served, the level of direct benefits provided to those households, and the number of households that remain unserved.

**Certification to the Assurances:**

As Chief Executive Officer, I agree to comply with the sixteen assurances contained in Title XXVI of the Omnibus Budget Reconciliation Act of 1981, as amended.\* By signing these assurances, I also agree to abide by the standard assurances on lobbying, debarment and suspension, and a drug-free workplace.

Signature: \_\_\_\_\_

Title: Governor, State of Oregon

Date: \_\_\_\_\_

In the above assurances which are quoted from the law, "State" means the 50 States, the District of Columbia, an Indian Tribe or Tribal Organization, or a Territory; "title" of the Act refers to Title XXVI of the Omnibus Budget Reconciliation Act of 1981 (OBRA), as amended, the "Low Income Home Energy Assistance Act"; "section" means Section 2605 of OBRA; and, "subsection" refers to Section 2605(b) of OBRA.

2605(a)  
2605(b)(1)

**Dates of Operation**

<b>Heating Assistance</b>	October 1 <sup>st</sup> through June 30 <sup>th</sup>
<b>Crisis Assistance</b>	Year-Round (as funding allows)
<b>Weatherization Assistance</b>	Year-Round (as funding allows)

At minimum, providers will be required to resolve crisis situations from December 1<sup>st</sup> through March 15<sup>th</sup>.

Based on funding levels and unique community need, local agencies may choose to offer crisis assistance on a year-round basis. Providers who opt for this timeline must specify details of this component in their agency work plan (contract).

Program timelines for any assistance component may be extended at the discretion of the Grantee (State of Oregon) based on funding and operational circumstances.

2605(c)(1)(C)  
2605(k)(1)  
2605(b)(9)  
2605(b)(16)

**Use of Funds**

49.86%	heating assistance
10%	crisis assistance
15%	weatherization assistance
10%	carryover to the following fiscal year
10%	administrative and planning costs
5%	services to reduce home energy needs (Assurance 16)
.14%	used to develop and implement leveraging activities (limited to the greater of 0.08% or <b>\$35,000</b> for States).
<b>100%</b>	<b>TOTAL</b>

Any funds reserved for winter crisis assistance that have not been expended by March 15<sup>th</sup> will be reprogrammed to heating assistance and/or local year-round crisis programs.

2605(b)(6)  
2605(b)(3)  
2605(b)(15)  
2604(c)(3)(a)  
2604(c)(3)(b)

**Program Delivery, Outreach and Accessibility**

All components of Oregon’s LIHEAP program are administered through local Community Action Agencies. There has been no change in providers between the 2011 and 2012 program years.

Oregon Housing and Community Services, as well as subgrantees who administer the LIHEAP program, are not responsible for delivery of the state’s welfare (e.g. SNAP, TANF, WIC) programs.

Outreach practices are designed to assure that all eligible households are made aware of available LIHEAP assistance. These include, but are not limited to:

- Placing posters/fliers in local and county social service offices, offices of aging, Social Security offices, VA, etc..
- Publishing articles in local newspapers or broadcast media announcements.
- Including inserts in energy vendor billings to inform individuals of the availability of all types of LIHEAP assistance.
- Mailings to past recipients of LIHEAP.
- Executing interagency agreements with other low-income program offices to perform outreach to target groups.
- Energy Education efforts in schools and community venues.

Applications for the LIHEAP program (every component, including crisis) will be accepted at sites that are geographically accessible to all households across the state.

Individuals who are “homebound” (physically infirm) will be provided alternative application methods, including but not limited to phone, mail and/or home visits.

Within their agency work plan (contract), subgrantees must outline how they will reach eligible households throughout their service area. This includes those households which may be least likely to apply for assistance because of communication, transportation or other service barriers.

2605(b)(2)  
2605(c)(1)(A)  
2605(b)(8)(B)

### **Heating Assistance Program**

#### ***Eligibility***

Households wishing to receive assistance from the Oregon LIHEAP program must be at or below 60% of state median income level. This eligibility requirement pertains to all components of the Oregon program--including heating, crisis and weatherization assistance.

Oregon does not utilize an assets test in determining eligibility.

Whether a household rents or owns their dwelling will not be a basis for determining eligibility. However, rental/utility agreements and landlord cooperation may affect the kind or level of benefits provided.

All households applying for LIHEAP must demonstrate energy burden using acceptable forms of documentation (as outlined in the Oregon LIHEAP manual). Applicants residing in subsidized housing *with heat included in rent* are not considered vulnerable to rising energy costs, and are therefore generally not eligible for LIHEAP Heating Assistance benefits.

Oregon does not uniformly give priority eligibility to elderly, disabled and families with young children. However, local contractors may choose to target these groups for a brief phase at the start of the heating season. Targeted intake periods are designed to allow for the additional time and outreach necessary to provide quality services to vulnerable populations, and are not intended to exclude non-targeted households for more than a short period of time.

Throughout the program year, local agencies may also opt to target specific services to allowable populations based on unique community need. This includes, but is not limited to:

- *Vulnerable Populations as defined by the LIHEAP statute*, including seniors, disabled and families with young children.
- *Households that have not accessed available energy assistance for the current program year (e.g. fuel funds)*. With multiple energy assistance resources available, targeting available LIHEAP funds to households who have yet to receive assistance will allow local providers to reach many in their community for the first time.
- *Households who opt to participate in pilot programs* including long term case management, energy education and/or arrearage management programs.

Subgrantees must indicate whether or not they intend to target any portion of the population within their local work plan (contract). At a minimum, this includes a complete description of local application, eligibility and outreach practices--as well as safeguard procedures to ensure that processes are applied consistently and fairly to all applicants.

2605(b)(5)  
2605(b)(2)  
2605(b)(8A)  
2605 (c)(1)(b)

**Determination of Benefits, Benefit Levels**

Oregon's LIHEAP program does not consider categorical eligibility when determining energy assistance benefits.

In an effort to assure that the highest level of assistance will be furnished to those households which have the lowest incomes and the highest energy costs or needs in relation to income, LIHEAP Heating Assistance benefit levels are determined through a payment matrix (see Attachment C) based on the following:

- Fuel type
- Household size
- Geographic location/climate
- Income
- Subsidized Housing Status

The matrix provides maximum benefit guidelines for standard heating assistance only, and does not affect any other component of the Oregon LIHEAP program. Oregon's heating component does not include in-kind benefits.

Agencies may wish to use alternate benefit levels in the following situations:

- **Deliverable Fuels:** In cases where a standard payment is not sufficient for a vendor to deliver fuel, subgrantees may issue applicants a “fuel” payment (up to \$500) in lieu of a standard benefit.
- **Pilot Projects:** Local agencies who wish to pilot alternative payment approaches are encouraged to work with the State of Oregon to implement such plans. This may include more detailed “burden-based” benefit levels, co-payments and/or supplemental assistance for households. Any variation from statewide payment levels or types must be approved and outlined within agency level work plans (contracts).

### **Heat and Eat Program**

The “Heat and Eat” program provides a \$1 annual benefit to food stamp recipient households who pay their utilities in the form of rent. This one-time payment increases the amount of food stamps households can receive during the program year.

The primary intent of this program is to generate additional financial resources for vulnerable households, increasing the likelihood that low-income Oregonians will maintain affordable housing, and sustain heat. The Heat and Eat Program also bolsters outreach and program coordination efforts as outlined in Sections 2605b(3) and (4) of the LIHEAP Statute.

2605(b)(7)

### ***Payments, Vendor Contracts***

Households are notified regarding the amount of assistance committed at the time of their intake. Applicants who apply by mail will receive a notice by mail, or may be notified by telephone.

Heating and Crisis assistance payments are made directly to home energy suppliers. All participating energy suppliers must sign vendor contracts with Community Action Agencies. The State of Oregon provides a contract template (see Attachment D) that has been constructed collaboratively with utilities, and approved by the Oregon State Attorney General’s Office in compliance with Federal and State regulations and assurances. Oregon Housing and Community Services reviews and maintains copies of the signed contracts between subgrantees and home energy suppliers.

All effort should be made by subgrantees to establish vendor contracts for administration of LIHEAP Benefits.. Subgrantees may also establish contracts with landlords to make LIHEAP payments on behalf of tenants (e.g. heat included in rent). However, in cases where a home energy vendor or landlord is not under contract, the applicant may be paid directly.

2604(c)  
2605(c)(1)(A)  
2605(b)(8)(B)

### **Crisis Assistance Program**

#### ***Eligibility***

A crisis exists when a household faces an energy burden which depletes or threatens to deplete financial resources, or which poses a potential health and/or safety threat to the well-being of the household.

Households wishing to receive crisis assistance must have exhausted a regular benefit prior to accessing crisis funds. In some situations, agencies may provide both crisis and regular benefits simultaneously.

Whether a household rents or owns their dwelling will not be a basis for determining eligibility. However, rental status and landlord cooperation may affect the kind or level of benefits provided (e.g. furnace repair/replacement).

2605(b)(5)  
2605(c)(1)(B)

***Determination of Benefits, Benefit Levels***

Local program contractors must ensure that energy crises are responded to from December 1st through March 15. If direct service funds are exhausted before March 15, staff must be available to assist households in crisis by providing information, referral, advocacy, and/or case management services.

Households facing energy-related emergencies must be served by a "fast track" or expedited procedure which ensures that:

- for life-threatening emergencies, some form of assistance will be provided within 18 hours of application that will resolve the energy crisis; and
- for non-life-threatening emergencies, some form of assistance will be provided within 48 hours of program application that will resolve the energy crisis..

Agencies are authorized to provide any of the following forms of assistance, or a combination thereof, which best resolves a given emergency situation:

- *Bill Payment Assistance*
- *Heat System Repair or Replacement*-includes repair, replacement or conversion of inoperative, non-functional or unsafe household heating equipment necessary to alleviate potential heating and/or energy crises. The applicant does not need to be the owner of the dwelling, however in the case of renter households, every attempt should be made to have the equipment repaired or replaced by the owner. When considering furnace repair or replacement, considerable effort should be made to supplement LIHEAP funds with other leveraged resources.
- *Other Equipment Repair/Replacement* – includes repair or replacement of inoperative, non-functional or unsafe household appliances/equipment necessary to alleviate home energy crises. When considering equipment repair or replacement, considerable effort should be made to supplement LIHEAP funds with other leveraged resources.
- *Other Emergency Services*—including, but not limited to information, referral, coordination of benefits, advocacy, case management and/or other goods and services necessary to relieve immediate threat to health and safety.

The maximum benefits for crisis assistance are:

Year-Round Crisis Assistance	\$500
Furnace or Equipment Replacement/Repair	\$5000

As with standard benefits, coordinators are encouraged to contact the state LIHEAP coordinator if they feel extreme circumstances warrant an exception to the maximum benefit guidelines.

In the event of household energy-related emergencies, in-kind benefits may be used to augment crisis assistance. These include, but are not limited to sleeping bags, clothing, blankets and emergency disaster kits.

Subgrantees are required to include a description of their crisis program within the local work plan (contract). At minimum, this includes eligibility criteria, a detailed description of crisis benefits, as well as how crises will be assessed and resolved within the statutory timelines outlined above.

#### **Weatherization Assistance Program**

Up to 15% of the LIHEAP funds available to Oregon may be used for home weatherization. All weatherization services are provided in cooperation with the same agencies that deliver heating and crisis assistance.

Each LIHEAP Weatherization subgrantee will submit an agency work plan (contract) which details application of these funds. Subgrantees will have the flexibility to design and implement programs which most effectively utilize available resources and meet the needs of their community.

2605(c)(1)(E)  
2605(b)(8)(B)

#### ***Eligibility***

All LIHEAP eligible households requesting weatherization will be placed on referral lists. Not all eligible households will be assisted due to limited funding. LIHEAP Weatherization funds may only be used serve LIHEAP income-eligible households (at or below 60% of state median income).

Prioritization is given to senior, disabled and households with children under the age of 6. Households may also be targeted based on their waiting list placement, energy burden and/or ability to utilize leveraged weatherization resources.

Subsidized housing residents are eligible for weatherization assistance.

Whether a household rents or owns their dwelling will not be a basis for determining eligibility. However, rental status and landlord responsibility/cooperation may affect the kind or level of benefits provided.

2605(b)(5)  
2605(c)(1)(B)  
2605(c)(1)(D)

#### ***Determination of Benefits, Benefit Levels***

Oregon administers LIHEAP weatherization under LIHEAP rules, with the following exceptions where LIHEAP and DOE WAP rules differ:

- Weatherize buildings if at least 66% of units (50% in 2- & 4-unit buildings) are eligible units or will become eligible within 180 days
- Weatherize shelters temporarily housing primarily low income persons (excluding nursing homes, prisons, and similar institutional care facilities).

The average maximum benefit per dwelling is \$6000. Eligible activities under the Oregon LIHEAP Weatherization program include:

*Home Repair* –weatherization related home repairs, including those necessary for health and safety.

*Weatherization* – including, but not limited to installation of insulation, reduction of infiltration, windows, furnace (retrofits, repairs, replacement) and base load measures. These funds allow subgrantees the ability to provide necessary services which are sometimes beyond the scope of DOE WAP limitations. However, LIHEAP Weatherization funds may not be used as a buy down for meeting the savings to investment ratio for materials used in the DOE WAP program.

*Energy Education Services* –Allocations for this activity will not exceed 5% of the LIHEAP Weatherization allocation. Funds in this category may be used to provide energy education and energy based incentives to LIHEAP eligible households or groups. This includes targeted groups where such education may be most effective (e.g. school aged children).

*Training and Technical Assistance* – Up to 5% of the LIHEAP Weatherization Allocation may be used at the subgrantee level for training and workshops necessary to maintain or improve technical skills. These funds may only be used for appropriate T&TA activities as identified in the DOE state plan for weatherization.

2605(b)(16)

#### **Assurance 16 Funding**

Within the Oregon LIHEAP Program, Assurance 16 funds are used to integrate existing energy programs, and enhance services for households with complex needs. Outcomes include reduced energy burden, improved payment patterns, energy conservation and improved self-sufficiency. 5% of the LIHEAP grant will be used to meet these objectives.

Subgrantees should consider community need and local program design when determining how to utilize Assurance 16 funding. Allowable uses include, but are not limited to:

- Needs Assessments
- Budget Planning
- Arrearage Management
- Energy Education
- Energy Saving Incentives (e.g. kits)
- Supplemental (Incentive) Bill Payments

All subgrantees are required to include a description of how they will use Assurance 16 funding within the local workplan (contract). At minimum, this includes eligibility criteria, benefit determination, description of services, and how Assurance 16 funds will be integrated within overall LIHEAP program design/delivery.

To ensure that no more than 5% of Oregon’s LIHEAP grant will be used for Assurance 16 purposes, these funds are allocated as a unique line item—and local budgets are monitored carefully for activities that could be captured under this assurance.

2605(b)(13)

**Applicant Rights to a Fair Hearing.**

All applicants are informed of their rights to a fair hearing by signing the authorization form, which contains the following statement directly above the signature line:

*“I further understand that if my application is unjustly denied or is not processed in a timely manner that I may be entitled to a fair hearing, if requested within 30 days of the completed date of the application or date of denial.”*

Network partners are required to include Fair Hearing procedures within their agency level contracts (work plans). Clients who believe they have been discriminated against may request to appeal with Oregon Housing and Community Services.

2605(b)(4)

**Coordination of Services, Leveraging Activities**

Within the parameters of the LIHEAP grant, local subgrantees are encouraged to design their programs with the intent of offering households a “wrap-around” approach to energy independence. This includes integration of bill payment assistance, case management, energy education, arrearage management and weatherization services.

The Oregon LIHEAP program actively coordinates its activities with the Oregon Energy Assistance Program (OEAP), existing fuel funds, fuel suppliers, local government and social service agencies to provide additional services for LIHEAP eligible households.

2607(A)

**Leveraging**

Leveraging Activities planned for the program year include:

**Weatherization Rebates & Grants**

Staff members from Oregon Housing and Community Services (OHCS) negotiate these leveraged resources which qualify under criterion (i) in the 45 CFR 96.87(d)(2). LIHEAP agency staff conduct an audit of each home to be weatherized and determine what measures are eligible for rebates from the utilities. Benefits provided include standard weatherization measures: attic, floor and wall insulation, windows, air infiltration reduction, pipe and duct insulation, vapor barriers and other items deemed necessary during the audit.

Rebates allow the agency to complete the measures and to perform full weatherization if funds can be leveraged to offset these costs. LIHEAP program operator works with utilities or agency to install cost effective weatherization measures and obtain the rebate for installation of those measures in low-income homes. Cash rebates and grants are based on the actual costs of the weatherization measures as installed and are based on fair market value.

OHCS (state) negotiates with BPA to provide low-income weatherization. OHCS staff members negotiated these leveraged resources which qualify under criterion (i) in 45 CFR 96.87(d)(2). Home energy cooperatives and public utility districts provide rebate for weatherization under this program. Again, the local LIHEAP agency staff member conducts the weatherization audit and determines what measures need to be performed and which rebates can be applied to offset the amount of LIHEAP funds expended. Benefits provided include standard weatherization measures: attic, floor and wall insulation, windows, air infiltration reduction, pipe and duct insulation, vapor barriers and other items deemed necessary during the audit. A household must be referred from the LIHEAP program to participate in LIHEAP weatherization.

OHCS has been designated by the state legislature as the administrator of public purpose funds for low-income weatherization. Public purpose funds are derived from customers of Oregon's two major investor owned electric utilities (PGE & PacifiCorp). OHCS allocates public purpose funds to weatherization agencies for PGE or PacifiCorp customers within their service territories. Public purpose funds supplement LIHEAP weatherization funds and provide the largest single source of leverage.

LIHEAP agency program staff members negotiate for rebates under the State (of Oregon) Home Oil Weatherization (SHOW) Program, Cascade Natural Gas, Northwest Natural Gas and Avista, which qualify under criterion (i) in 45 CFR 96.87(d)(2). LIHEAP agency staff member conducts the weatherization audit on the oil heated home and determines which rebates can be applied to offset the amount of LIHEAP funds expended. Benefits provided include standard weatherization measures: attic, floor and wall insulation, windows, air infiltration reduction, pipe and duct insulation, vapor barriers and other items deemed necessary during the audit. A household must be referred from the LIHEAP program.

LIHEAP agency program staff members negotiate with agency rehabilitation programs to offset the costs of LIHEAP weatherization. These funds qualify under criterion (i) in 45 CFR 96.87(d)(2). Benefits provided include standard weatherization measures: attic, floor and wall insulation, windows, air infiltration reduction, pipe and duct insulation, vapor barriers and other items deemed necessary during the audit. A household must be referred from the LIHEAP program.

LIHEAP agency staff members negotiate with landlords contribute to the costs of weatherization for LIHEAP households where the LIHEAP participant is renting. These funds would qualify under criterion (i) in 45 CFR 96.87 (d)(2). The landlord would provide funds to offset the costs of materials and labor for the installed measures deemed critical in the weatherization audit.

#### **Discounts on Weatherization Products & Services**

LIHEAP agency staff members negotiate with private companies who contract to install weatherization measures for investor owned utilities. These funds would qualify under criterion (i) in 45 CFR 96.87 (d)(2). LIHEAP weatherization staff would conduct the audit and coordinate funding with the private company to apply for rebates and to install weatherization measures at reduced cost to low-income households who are referred from the LIHEAP program.

LIHEAP agency staff members negotiate with contractors and suppliers to get discounts for low-income households under the criterion (iii)(B) in 45 CFR 96.87(d)(2). They receive discounts on all competitive bidding contracts and materials purchased for weatherization. Discounts are for materials to perform standard weatherization measures including attic, floor and wall insulation, windows, air infiltration reduction, pipe and duct insulation, vapor barriers and other items deemed necessary during the audit. A household must be referred from the LIHEAP program.

#### **Donated Energy-Saving Materials & Services**

LIHEAP staff members leverage in-kind donations from utility companies, private companies, individuals under the criterion in 45 CFR 96.87(d)(2)(iii)(A) to provide LIHEAP households with materials to do self-help weatherization. These materials include hot water saving showerheads, caulking, water heater insulation wraps. Electrical junction box air sealing gaskets, door sweeps and weather-strip kits, and other supplies to weatherize homes. Program representatives deliver and install these items in low-income families' homes.

#### **Fuel Assistance Funds**

Benefits are integrated into LIHEAP program under 45 CFR 96.87(d)(2)(iii)(A). LIHEAP personnel identify eligible clients at time of intake, determine how much they would receive and either distribute the funds to them or made direct referral to state fuel funds for payment. LIHEAP personnel negotiate with utility companies to have fuel funds delivered through the LIHEAP program to serve eligible clients when program funds are exhausted.

#### **Discounts, Waivers, Credits on utilities and Fuel Oil**

LIHEAP personnel negotiate discounts with home energy suppliers under the criterion (iii)(D) in 45 CFR 96.87(d)(2). Discounts are on the purchase of heating fuels and waivers of deposits and/or reconnect fees for low-income customers. LIHEAP agency certifies the customers for eligibility and company then provides a benefit to eligible low-income client. Waivers of deposits or reconnect fees are negotiated with the home energy supplier by the LIHEAP intake personnel.

**Donation of Heating Fuels, Blankets, Coats, etc.**

LIHEAP personnel negotiate with home energy suppliers, grants, and private donors under the criterion (iii)(G) 45 CFR 96.87(d)(2) to provide wood, heating fuel. Various clothing and blankets for low-income households. Organizations donate labor to cut, split, deliver and stack firewood; some lumberyards donate wood; some oil companies donate fuel oil; and some propane dealers donate LP gas. Other benefits included coats, jackets, warm clothing, blankets, and quilts.

***Use of Leveraging Incentive Funds***

In the case that the Grantee (State of Oregon) receives a leveraging incentive award, these funds will be distributed to local subgrantees based upon reported leveraging activity.

These funds are to be used to maintain or increase current LIHEAP benefits to Oregonians. This includes, but is not limited to heating assistance benefits, crisis assistance benefits, incentive or supplemental vendor payments, weatherization activities, and energy saving incentives.

2605(b)(12)  
2605(a)(2)

**Timely and Meaningful Public Participation**

The State of Oregon (Oregon Housing and Community Services) actively participates in numerous groups which serve to advise and participate in the development of the Oregon LIHEAP Program.

The *Oregon Energy Coordinators Association (OECA)* conducts quarterly meetings where statewide energy assistance issues are discussed. These gatherings include Round Table sessions for both energy assistance and weatherization coordinators from around the state, all of whom contribute ideas and address challenges associated with the current LIHEAP program. Representatives from this group are also active in reviewing the annual state plan and LIHEAP Operations Manual.

The *Advisory Committee on Energy (ACE)* conducts bi-monthly meetings which discuss energy issues facing low-income Oregonians. Consisting of utilities, service providers, advocates and government officials—ACE makes regular recommendations which guide the development of low income energy assistance programs across Oregon.

The *Community Action Partnership of Oregon (CAPO)* consists of executive directors from Community Action agencies around the state. This body actively reviews and recommends Oregon LIHEAP policy, and is active in reviewing the annual state plan.

The *Utility Advisory Committee* consists of utilities from around the state. Quarterly meetings are held to discuss program issues, vendor contracts and collaboration within an ever-challenging energy landscape.

OHCS also holds regular meetings with subgrantees, including:

- a two day work session with subgrantees in Salem to address current and future LIHEAP program development

## Oregon 2011 LIHEAP State Plan

- regional meetings regarding pilot/developing programs
- several workgroups made up of local subgrantees (e.g. OPUS database, statewide allocation formula, innovative payment plans)
- numerous site-visits in which subgrantees share their unique local programs, ideas and challenges

A public comment period on the LIHEAP state plan will be held from August 2- August 17, 2011--with a public hearing on August 17 in Salem.

Public comments will be summarized in Attachment E.

2605(b)(10)

### **Compliance**

Subgrantees enter into work plan agreements (contracts) that specifically outline local procedures for outreach, eligibility, application, intake, benefit determination and certification of payment to LIHEAP applicants.

These agreements will be monitored throughout the program year for compliance with federal guidelines and state LIHEAP requirements using a newly developed four tier compliance model, consisting of the following components (detailed below):

Program Review:	Every program year
On-site Evaluation:	Every two program years
Fiscal Monitoring:	Every program year
Single (A-133) Audit:	Every program year

#### ***Annual Program Review:***

All subgrantees will be required to participate in an annual program review. During this process, household files will be evaluated for compliance with eligibility, certification of income, benefit determination and payment guidelines associated with the Oregon LIHEAP Program. Additionally, selected files will be assessed for timely response to applicants (particularly in crisis situations) and appropriate documentation.

#### ***On-Site Evaluation:***

Beginning in PY 2011, all subgrantees will be required to participate in an on-site program monitoring, at minimum, once every two years. In addition to the annual program review noted above, the State of Oregon will visit agencies to further evaluate LIHEAP delivery and compliance with local work plans. Monitoring elements will include, but are not limited to, outreach procedures, ease of access for applicants, vendor contracts, and whether or not program design meets community need.

#### ***Fiscal Monitoring:***

OHCS monitors fiscal operations within local agencies to ensure strong fiscal accounting and tracking of LIHEAP funds. Comprehensive annual reviews include, but are not limited to the following:

## Oregon 2011 LIHEAP State Plan

- General Ledger and Support Journals
- Financial Status Reports
- Charts of Accounts
- Accounting Policy and Procedure Manual
- Separation of Duties and internal controls
- Cash Receipt Files and Deposit Slips
- Bank Reconciliation with Canceled Checks
- Samples of paid invoices, including signatures and check copies
- Time cards, including signatures and payroll register
- Purchase Orders
- Cost Allocation Plans
- Insurance and Bonding Policies
- Subcontracts
- Computer/Data Security

### ***Program Auditing***

Oregon's LIHEAP program is audited under the Single Audit Act.

Audits of local service providers are conducted by an entity independent of any agency administering activities or services under LIHEAP, and in accordance with generally accepted accounting principles and audit standards of the US General Accounting Office.

Both the Program and Fiscal staff of Oregon Housing and Community Services review the annual independent audits which are conducted by private CPA firms. The CPA firms conduct the audit in accordance with A133, if applicable.

Audits for the State of Oregon (Oregon Housing and Community Services) are conducted by the Audits Division of the Secretary of State's office.

### ***Corrective Action***

The State of Oregon may choose to require subgrantees to participate in additional monitoring activities when there is concern regarding potential non-compliance with Federal or State LIHEAP guidelines.

If a subgrantee or subrecipient is deemed to be out of compliance on the basis of monitoring results (routine or otherwise), the State of Oregon will provide the agency with corrective action steps necessary to resolve the concern. This includes, wherever possible, training and technical assistance.

If a subgrantee or subrecipient is unable to make improvements necessary to effectively deliver the LIHEAP program within a specified timeframe, another local service provider may be identified for future program operation.

2605(b)

**Goals and Objectives**

The State of Oregon looks forward to collaborative development and implementation of the following LIHEAP program goals:

- *To continually improve data quality and availability.* This includes continued development of our statewide database (OPUS)—as well as access to new information sources, including utility usage and payment history for low-income households.
- *To improve monitoring, fraud prevention and internal control policies across the network.* Attachment 1 of this plan (pp 20-31) provides a current assessment of Oregon LIHEAP program integrity—including areas where further work is needed. Specific goals for the PY 2012 program year include:
  - a) Improved Practices for Authenticating and Monitoring Vendors [update]
  - b) Continued testing of non-traditional ways of providing bulk fuel
- *Performance Goals and Measures.* In conjunction with HHS and NEADA, the State of Oregon will be working to implement LIHEAP performance goals and measures at the state and national level.

DRAFT

**PROGRAM INTEGRITY ASSESSMENT SUPPLEMENT**  
 Low Income Home Energy Assistance Program (LIHEAP)

ABSTRACT: HHS is requiring further detail from States on their PY2012 plans for preventing and detecting fraud, abuse, and improper payments. HHS is also requiring that States highlight and describe all elements of this PY2012 plan which represent improvements or changes to the State’s PY2011 plan for preventing and detecting fraud, abuse and improper payment prevention.

**Grantee: State of Oregon**

**Year: PY 2012**

RECENT AUDIT FINDINGS	
Describe any audit findings of material weaknesses and reportable conditions, questioned costs and other findings cited in PY2011 or the prior three years.	<p>The Oregon LIHEAP Program was audited by the Secretary of State for PY 2009. There were two findings associated with this audit.</p> <p><b>#1: Insufficient Program Monitoring of Subgrantee agencies.</b></p> <p>Excerpt from SOS Audits Division Letter:</p> <p><i>“Federal regulations require the Oregon Housing and Community Services Department (department) to monitor the activities of sub-recipients to ensure that federal awards are used for authorized purposes. The department’s Low-Income Home Energy Assistance Program (LIHEAP) state plan requires program and fiscal onsite visits of sub-recipients be performed to partially fulfill this requirement.</i></p> <p><i>According to management, inadequate resources have hindered the department’s ability to perform its program onsite reviews. Insufficient subrecipient monitoring increases the risk that sub-recipients are not administering federal awards in compliance with federal requirements. Department management made efforts to compensate for a lack of program onsite monitoring through training and technical assistance visits, desktop monitoring, and communications. However, there was insufficient documentation of these alternate procedures to allow us to confirm their effectiveness. In addition, these alternate procedures did not address all program monitoring activities such as client eligibility determinations at the subrecipient level.</i></p> <p><b><i>We recommend</i></b> department management ensure required program monitoring is performed in compliance with federal requirements. <i>In addition, we recommend sufficient documentation of monitoring activities be maintained.”</i></p> <p><b>#2: Late Report Submission</b></p> <p>Excerpt from SOS Audits Division Letter:</p> <p><i>“Federal regulations require the Oregon Housing and Community Services Department to submit an annual financial status report for the Low-Income Home Energy Assistance Program (LIHEAP). The financial status reports for the period ending September 30, 2008, were required to be submitted by December 30, 2008. The department submitted the majority of the reports in January 2010, approximately a year late. The individual responsible for submitting the financial status report was previously unaware of the reporting requirement, but took immediate action to prepare the delinquent reports once notified of the error.</i></p> <p><b><i>We recommend</i></b> department management establish a report tracking process to ensure compliance with federal reporting requirements.”</p>

RECENT AUDIT FINDINGS, continued									
<p>Please describe whether the cited audit findings or relevant operations have been resolved or corrected. If not, please describe the plan and timeline for doing so in PY2012.</p>	<p><b>Insufficient Program Monitoring of Subgrantee agencies:</b> OHCS continually strives to improve LIHEAP services while ensuring program compliance at all levels of implementation. In PY 2010, additional staff resources were dedicated to program compliance at the subgrantee level, and the monitoring process was retooled and expanded for improved results.</p> <p>As a result of the above mentioned audit finding, all program documentation (including state administrative rules) are also being aligned to reflect accurate subgrantee monitoring timelines as follows:</p> <table border="0" data-bbox="499 407 1262 532"> <tr> <td>Program Review:</td> <td>Once every program year</td> </tr> <tr> <td>Fiscal Monitoring:</td> <td>Once every program year</td> </tr> <tr> <td>On-site Evaluation:</td> <td>Once every two program years (at minimum)</td> </tr> <tr> <td>Single (A-133) Audit:</td> <td>Once every program year</td> </tr> </table> <p><b>Late Report Submission:</b> As a result of the audit, the LIHEAP Coordinator works more closely with Fiscal managers to collaboratively assure local compliance with fiscal reporting requirements--and subsequently, more timely submission of Federal reports.</p>	Program Review:	Once every program year	Fiscal Monitoring:	Once every program year	On-site Evaluation:	Once every two program years (at minimum)	Single (A-133) Audit:	Once every program year
Program Review:	Once every program year								
Fiscal Monitoring:	Once every program year								
On-site Evaluation:	Once every two program years (at minimum)								
Single (A-133) Audit:	Once every program year								
<p>If there is no plan in place, please explain why not.</p>	<p>N/A</p>								
<p>Necessary outcomes from these systems and strategies</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>								

COMPLIANCE MONITORING	
<p>Describe the State's PY2011 strategies that will continue in PY2012 for monitoring compliance with State and Federal LIHEAP policies/procedures.</p>	<p>During PY 2010, the State of Oregon (OHCS) developed a six part compliance model for Energy Assistance Programs. This comprehensive process utilizes existing components as well as new tools to assure statewide compliance, quality customer service and continual program improvement. This model is detailed on the following page.</p> <p>In addition to annual fiscal monitoring and A-133 audits, LIHEAP Weatherization programs are also monitored on-site annually.</p>
<p>Please highlight any strategies for compliance monitoring from your plan which will be newly implemented as of PY2011.</p>	<p>While portions of the process described above are already in place, OHCS will begin fully implementing the six part compliance model in PY 2011 for all subgrantees across the state.</p>

<b>COMPLIANCE MONITORING, continued</b>	
If you don't have a firm compliance monitoring system in place for PY11, please describe how the State is veriPYing that LIHEAP policy is followed.	N/A
Necessary outcomes from these systems and strategies	<i>A sound methodology, with a schedule for regular monitoring and a more effective monitoring tool to gather information.</i>

<b>FRAUD REPORTING MECHANISMS</b>	
For PY2011 activities continuing in PY2012, please describe all mechanisms available to the public for reporting cases of suspected LIHEAP fraud, waste or abuse and strategies for advertising these resources.	<p>Subgrantees are required to submit reports when suspected fraud or allegations of fraud, waste or abuse are received or discovered. Currently, the public (as well as employees associated with the LIHEAP program) have three primary points for reporting potential fraud, waste or abuse:</p> <p>A. Local LIHEAP Agencies: Contact information is posted on both the Oregon LIHEAP and the Community Action Network websites.                      B. State Administering Agency: Contact information is on the State of Oregon website, including phone and a designated email address.                      C. The State of Oregon: The State has a dedicated hotline available for citizens to report potential Fraud, Waste and Abuse.</p> <p>In addition to websites listed above, contact information is widely available through network partners (e.g. utilities) as well as printed outreach material distributed through the state.</p>
Please highlight any tools or mechanisms which will be newly implemented in PY2012, and the timeline for that implementation.	In PY 2011, information was added to our website which explicitly provides guidance and contact information for any individual wishing to report suspected fraud, waste and abuse within the Oregon LIHEAP Program. Oregon Housing and Community Services will also be developing a tracking system which allows staff to better coordinate responses to local agencies and public citizens reporting suspected fraud across all state energy assistance programs. (? Question asks for new tools in 2012, do we have any?)
If you don't have any tools or mechanisms available to the public to prevent fraud or improper payments, please describe your plan for involving all citizens and stakeholders involved with your program in detecting fraud.	N/A

<b>FRAUD REPORTING MECHANISMS, continued</b>	
<b>Necessary outcomes of these strategies and systems</b>	<i>Clear lines of communication for citizens, grantees, clients, and employees to use in pointing out potential cases of fraud or improper payments to State administrators.</i>
<b>VERIFYING APPLICANT IDENTITIES</b>	
<b>Describe all PY2011 State policies continuing in PY2012 for how identities of applicants and household members are verified.</b>	<p>To apply for LIHEAP in Oregon, applicants must present multiple forms of documentation including, but not limited to proof of income for all adult members of the household and copies of current home energy bills.</p> <p>All LIHEAP households are placed into a statewide database (OPUS) developed and maintained by Oregon Housing and Community Services. OPUS requires entry of several personal identifiers in order to process energy assistance benefits--including but not limited to names, birthdates, Social Security numbers and physical addresses of all household members. Information is available for all LIHEAP households accessing services within the last 10 years.</p> <p>Use of this statewide database not only prevents duplicate payments, but also allows LIHEAP providers to identify discrepancies in personal information provided by HH at the time of eligibility determination</p>
<b>Please highlight any policy or strategy from your plan which will be newly implemented in PY2012.</b>	<p>During PY 2011, Oregon Housing and Community Services began working with Federal and State partners to obtain access to databases in an effort to validate personal information provided by LIHEAP applicants. OHCS is continuing this critical task. Once the database of preference is identified, OHCS intends to randomly verify household information on a percentage of processed applications. This sampling will allow the state office to evaluate the feasibility of designing and implementing systems to access various government databases during LIHEAP intake processes at the local level.</p> <p>In 2012, households will be required to provide a SSN and form of identification for all household members receiving LIHEAP services.</p>
<b>If you don't have a system in place for verifying applicant's identities, please explain why and how the State is ensuring that only authentic and eligible applicants are receiving benefits.</b>	N/A
<b>Necessary outcomes from these systems and strategies</b>	<i>Income and energy supplier data that allow program benefits to be provided to eligible individuals.</i>

<b>SOCIAL SECURITY NUMBER REQUESTS</b>	
Describe the State's PY2012 policy in regards to requiring SSN from applicants and/or household members applying for LIHEAP benefits.	All LIHEAP applicants and household are required to provide a Social Security Number during the application process. The applicant will not be required to show the card at intake, rather will be able to verbally provide the number. If a new applicant refuses (e.g. safety issues), an alternate client identification number is generated by our statewide database. This number is then tied to a combination of other unique personal identifiers (name, birthdate, address) provided by the applicant.
Please describe whether the State's policy for requiring or not requiring Social Security numbers is new as of PY2012, or remaining the same.	The social security number requirement for PY 2012 is new., Prior to PY 2012, the State of Oregon did not require applicants to provide social security numbers for family members, rather only requested them.
If the State is not requiring SSN of LIHEAP applicants and/or HH members, please explain what measures are being employed to prevent fraud.	As stated above, Oregon will be requiring that all LIHEAP applicants and HH members provide a Social Security number.
Necessary outcomes from these systems and strategies	<i>All valid household members are reported for correct benefit determination.</i>

<b>CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES</b>	
Describe if and how State used government systems to verify applicant or HH member identities in PY 2011 and continuing in PY 2012.	<p>Oregon will continue to use the statewide OPUS Database to check for duplicate Social Security Numbers across all applicants and household members. When duplicate numbers are identified, providers contact the Social Security Administration to verify authenticity.</p> <p>Many local providers also have interagency agreements which allow them to utilize other government databases (e.g. SNAP) to verify household information—including identity, income and household composition.</p>
Please highlight which, if any, policies or strategies for using existing government databases will be newly implemented in PY2012.	During PY 2012, Oregon Housing and Community Services will be working with Federal and State partners to obtain access to databases which may help validate personal information provided by LIHEAP applicants. Once access is granted, OHCS intends to randomly verify household information on a percentage of processed applications. This sampling will allow the state office to evaluate the feasibility of designing and implementing systems to access various government databases during LIHEAP intake processes at the local level.

<b>CROSS-CHECKING SOCIAL SECURITY NUMBERS AGAINST GOVERNMENT SYSTEMS/DATABASES, continued</b>	
<p>If the State won't be cross checking SSN /ID information with existing government databases, please describe how the State will supplement this fraud prevention strategy.</p>	<p>See above responses.</p>
<p>Necessary outcomes from these systems and strategies</p>	<p><i>Use of all available database systems to make sound eligibility determination.</i></p>

<b>VERIFYING APPLICANT INCOME</b>	
<p>Describe how the State or designee used State Directories of new hires or similar systems to confirm income eligibility in PY2011 and continuing in PY2012.</p>	<p>Oregon requires that all applicant files contain documentation of income for every adult household member receiving LIHEAP benefits. Documents used to verify include, but are not limited to wage/earning statements, tax statements and award letters (for benefit transfer income). Many local providers also have interagency agreements which allow them to utilize other government databases (e.g. SNAP) to cross reference and verify household income information.</p>
<p>Please highlight any policies or strategies for using new hire directories which will be newly implemented in PY2012.</p>	<p>Oregon Housing and Community Services is currently working with State partners to access employment databases that will facilitate verification of LIHEAP household income. This will allow the state office to evaluate the feasibility of designing and implementing systems to access income/employment databases during LIHEAP intake processes at the local level.</p>
<p>If the State won't be using new hire directories to verify incomes how will the State be verifying the that information?</p>	<p>See above responses.</p>
<p>Necessary outcomes from these systems and strategies</p>	<p><i>Effective income determination achieved through coordination across program lines.</i></p>

**PRIVACY-PROTECTION AND CONFIDENTIALITY**

Describe the financial and operating controls in place in PY2011 that will continue in PY2012 to protect client information against improper use or disclosure.

- A. Guidance and Policy regarding confidentiality can be found throughout Oregon LIHEAP program documentation. Key examples include:
  - Master Grant Agreement: *“Sub-grantee shall, and shall cause its sub-recipients to, protect the confidentiality of all information concerning applicants for and recipients of services funded by this Agreement. It shall not release or disclose any such information except as necessary for the administration of the program(s), as authorized in writing by the applicant or recipient or as required by law. All records and files shall be appropriately secured to prevent access by unauthorized persons. Sub-grantee shall, and shall cause its sub-recipients to, ensure that all its officers, employees and agents are aware of and comply with this confidentiality requirement.”*
  - LIHEAP Operations Manual: *“Each agency must have in place policies and procedures to assure compliance with Section 19 of the Master Grant Agreement (Confidentiality). This includes an agency-developed statement signed annually by each staff member and volunteer(s) with access to confidential information. For the protection of applicants and recipients, staff and volunteers must not disclose or use the contents of records, files, papers or communications for purposes other than those directly connected with the administration of energy programs, whether on or off duty.”*  
  
*“A breach of applicant’s confidentiality is not only unethical, but grounds for legal action against the agency. The only client information that can be released to a home energy supplier is that which is essential for making payment to a client’s account. Name, address, account number and payment amount are appropriate information to share. The client’s income and other services provided to the client are not appropriate to share with a home energy supplier. In order to request account information from a vendor, the energy assistance application must include the account holder’s signature (release of information).”*
- B. All agencies are required to enter applicant information into a statewide database (OPUS). This system requires a username and password for login, and users must read and sign the User Policy, Responsibility & Code of Ethics form before granted access. Local agencies are to assure that all OPUS users understand and comply with the responsibilities included in this document. Individuals functions and roles in OPUS are limited to the duties performed by the user, and are monitored by both local and state systems administrators.  
  
LIHEAP Applicants are also informed of their privacy rights through the OPUS Privacy Notice. According to the LIHEAP Operations Manual:  
  
*“An OPUS Privacy Notice is to be placed in a visible location, such as a waiting room or intake offices. The notice describes how information received during an intake, and entered into OPUS, will be used—as well as the consumer’s rights regarding that information. All agencies must have the “Privacy Notice to Consumers of Services” available upon request. It describes how the consumer’s confidential information will be used, and circumstances under which information will be disclosed.”*
- C. All staff are required to use secure procedures, and limit use of private information when transmitting emails correspondence.
- D. Private data is only maintained for the period and manner required by law.

PRIVACY-PROTECTION AND CONFIDENTIALITY, continued	
<p>Please highlight any controls or strategies from your plan which will be newly implemented as of PY2012.</p>	<p>As Oregon works with partners to gain access and utilize various client databases, every effort will be put forth to protect applicant privacy and maintain strict confidentiality standards through interagency agreements and/or contracts.</p>
<p>If you don't have relevant physical or operational controls in place to ensure the security and confidentiality of private information disclosed by applicants, please explain why.</p>	<p>N/A</p>
<p>Necessary outcomes from these systems and strategies</p>	<p><i>Clear and secure methods that maintain confidentiality and safeguard the private information of applicants.</i></p>

LIHEAP BENEFITS POLICY	
<p>Describe PY2011 State policies continuing in PY2012 for protecting against fraud when making payments, or providing benefits to energy vendors on behalf of clients.</p>	<p>The State of Oregon has multiple internal controls in place to prevent fraud during administration of LIHEAP payments:</p> <ul style="list-style-type: none"> <li>• Applications are authorized through a certification process at each local service provider. This process requires multiple staff members to review a household application, as well as approve the determined energy assistance benefit.</li> <li>• OPUS (the statewide database) limits the maximum dollar amount, as well as type of benefit, households are able to receive. Any exceptions must be approved by the state coordinator, and the software can only be over-ridden by the state system administrator.</li> <li>• A Notice of Action is sent to all households who receive LIHEAP. This notification includes vendor information, the benefit amount and when a household may expect to see the assistance applied to their account.</li> <li>• All vendors are required to sign a vendor contract which outlines application of LIHEAP assistance to home energy accounts as well as refund policies. Sub-grantees are required to monitor these agreements at the local level. Oregon Housing and Community Services works with local agencies to provide training to vendors, particularly as program policies and procedures are modified or updated.</li> <li>• All vendor payments are tracked, batched and paid through the OPUS database.</li> <li>• The State Coordinator regularly monitors vendor payment activity for each agency, particularly those areas where unusual patterns or anomalies are apparent.</li> </ul> <p>Direct payment to households is only allowed when heat is included in rent, or when there is no signed contract with the energy supplier.</p>

<b>LIHEAP BENEFITS POLICY, continued</b>	
<p><b>Highlight any fraud prevention efforts relating to making payments or providing benefits which will be newly implemented in PY2012.</b></p>	<p>In PY 2012, Oregon Housing and Community Services will continue working with the statewide network to identify ways to reduce the need for direct household payments. This includes facilitating vendor contracts for non-traditional bulk fuel (e.g. wood) vendors, purchasing pre-paid bulk fuel cards, as well as identifying and evaluating alternate benefit arrangements for applicants whose heat is included in rent.</p> <p>In PY 2012, Oregon Housing and Community Services will begin authenticating home energy suppliers through business/licensing and employment databases.</p>
<p><b>If the State doesn't have policy to prevent improper payments what supplementary steps is the State taking to ensure program integrity?</b></p>	<p>N/A</p>
<p><b>Necessary outcomes from these systems and strategies</b></p>	<p><i>Authorized energy vendors are receiving payments on behalf of LIHEAP eligible clients.</i></p>

<b>PROCEDURES FOR UNREGULATED ENERGY VENDORS</b>	
<p><b>Describe the State's PY2011 procedures continuing in PY2012 for averting fraud and improper payments when dealing with bulk fuel dealers of heating oil, propane, wood and other un-regulated energy utilities.</b></p>	<p>Many of the internal controls in place for payment to regulated utilities also apply to unregulated vendors:</p> <ul style="list-style-type: none"> <li>• All vendors are required to sign a vendor contract which outlines application of LIHEAP assistance to home energy accounts, as well as refund policies. Sub-grantees are required to monitor these agreements at the local level.</li> <li>• All vendor payments are tracked, batched and paid through the OPUS database.</li> <li>• The State Coordinator regularly monitors vendor payment activity for each agency, particularly those areas where unusual patterns or anomalies are apparent.</li> <li>• Oregon Housing and Community Services works with local agencies to provide training to vendors, particularly as program policies and procedures are modified or updated.</li> <li>• In cases where there is no vendor contract, a direct payment should be made to the household (receipt for fuel is required).</li> </ul>
<p><b>Please highlight any strategies policy in this area which will be newly implemented in PY2012.</b></p>	<p>In PY 2012, Oregon Housing and Community Services will continue working with the statewide network to identify ways to reduce the need for direct household payments (for example, facilitating vendor contracts for bulk fuel vendors).</p> <p>In PY 2012, Oregon Housing and Community Services will begin authenticating home energy suppliers through business/licensing and employment databases.</p>

<b>PROCEDURES FOR UNREGULATED ENERGY VENDORS, continued</b>	
<b>If there is no plan for averting fraud when dealing with unregulated vendors, please describe how the State is ensuring program integrity.</b>	N/A
<b>Necessary outcomes from these systems and strategies</b>	<i>Participating vendors are thoroughly researched and inspected before benefits are issued.</i>

<b>VERIFYING THE AUTHENTICITY OF ENERGY VENDORS</b>	
<b>Describe State PY2011 policies continuing in PY2012 for verifying authenticity of energy vendors being paid under LIHEAP.</b>	<p>All vendors who receive LIHEAP payment on behalf of households must be entered into the OPUS system to receive payment. The database will not recognize the vendor without valid identifying information (including a tax ID number). Begin and End dates of the signed vendor contract must also be entered in order for the vendor to be recognized.</p> <p>In PY 2011, Oregon Housing and Community Services also began developing a process to more closely monitor and validate all vendors who receive payments on behalf of LIHEAP households. This includes verification of current vendor contracts within the monitoring process.</p>
<b>Please highlight any policies for verifying vendor authenticity to be newly implemented in PY2012.</b>	<p>In PY 2012, Oregon Housing and Community Services will begin authenticating home energy suppliers through business/licensing and employment databases.</p> <p>OHCS will also continue updating the LIHEAP Operations Manual and provide training to local providers regarding steps that should be taken to verify authenticity before entering into contract with any home energy supplier.</p>
<b>If there is no system in place to verify vendor authenticity, please describe how the State ensures funds are paid to valid intermediaries.</b>	N/A
<b>Necessary outcomes from these systems and strategies</b>	<i>An effective process that effectively confirms the existence of entities receiving federal funds.</i>

<b>TRAINING AND TECHNICAL ASSISTANCE</b>	
<p>In regards to fraud prevention, please describe elements of your PY2011 plan continuing in PY2012 for training and providing technical assistance to (a) employees, (b) non-governmental staff involved in the eligibility process, (c) clients, and (d) energy vendors</p>	<p>Oregon Housing and Community Services understands that mutual trust between partners fosters the open exchange of information--resulting in identified areas for improvement and meaningful progress toward program objectives. Subsequently, the Oregon Energy Assistance network collaboratively facilitates multiple opportunities for training and technical assistance:</p> <ul style="list-style-type: none"> <li>A) OHCS (State) Employees engage in regular cross training activities to assure appropriate grant management, comprehensive subgrantee compliance reviews, timely submission of Federal Reports and to maintain a system for developing adaptive, system-wide fraud prevention policies.</li> <li>B) LIHEAP service providers and partners receive annual training each fall regarding updated policy, eligibility criteria or guidelines. The LIHEAP Operations manual, which is designed and updated by a team of state and local staff, is also reviewed at this time.</li> </ul> <p>Statewide Energy Coordinator roundtables are held once a quarter to discuss specific concerns or issues related to everyday delivery of the LIHEAP program. These meetings include key vendor and other stakeholder involvement. A work session is also held amongst local energy coordinators and key OHCS staff each spring to identify and discuss program areas that need additional development before the next heating season--including potential fraud prevention or risk mitigation policies.</p> <p>Pointed training and technical assistance is provided to local providers during compliance review processes. Common concerns are addressed at a network level, and often lead to updated or clarified policy/program documentation.</p> <ul style="list-style-type: none"> <li>C) Eligible Oregonians should have clear understanding of LIHEAP application processes. Local agencies must develop outreach plans, intake procedures and notification policies which clearly outline eligibility requirements as well as supporting documentation necessary to complete the LIHEAP application.</li> </ul> <p>Households are informed of their rights and responsibilities on both on the application, as well as during intake. This includes guidelines around privacy and confidentiality. Applicants are also informed of consequences if they provide false information to receive LIHEAP benefits.</p> <ul style="list-style-type: none"> <li>D) Vendors receive training and technical assistance from local Service Providers and OHCS staff at the annual fall training, during quarterly round tables and as needed throughout the program year. Vendors and other key stakeholders (e.g. PUC) also receive a copy of our annual Operations Manual, either at the annual Fall Training, or via mail.</li> </ul>
<p>Please highlight specific elements of your training regiment and technical assistance resources from your plan which will represent newly implemented in PY2012</p>	<p>During PY 2012, training and technical Assistance will be provided to relevant partners regarding new or updated program elements mentioned above. These include but are not limited to:</p> <ol style="list-style-type: none"> <li>1. Use of federal or state databases to verify identity and income information.</li> <li>2. Data Analysis necessary to detect anomalies or potential risk at the local level.</li> <li>3. Building locally tailored internal controls frameworks.</li> </ol> <p>Any recommended methods for fraud prevention will be extensively vetted with the Oregon Energy Assistance Network. If new policies are adopted, appropriate training and technical assistance will be provided to statewide partners.</p>

<b>TRAINING AND TECHNICAL ASSISTANCE, continued</b>	
<p>If there is no system in place for anti-fraud training or technical assistance for employees, clients or energy vendors, please describe your strategy for ensuring all employees understand what is expected of them and what tactics they are permitted to employ.</p>	<p>N/A</p>
<p>Necessary outcomes from these systems and strategies</p>	<p><i>The timely and thorough resolution of weaknesses or reportable conditions as revealed by the audit.</i></p>

<b>AUDITS OF LOCAL ADMINISTERING AGENCIES</b>	
<p>Please describe the annual audit requirements in place for local administering agencies in PY2011 that will continue into PY 2012.</p>	<p>In addition to program and fiscal compliance monitoring, provider agencies are required to have an independent, single (A-133) audit once per year. These audits are reviewed by Oregon Housing and Community Services as a component of the six part compliance process.</p>
<p>Please describe new policies or strategies to be implemented in PY2012.</p>	<p>See above.</p>
<p>If you don't have audit requirements for local administering agencies, please explain how LIHEAP funds are properly audited under the Single Audit Act requirements.</p>	<p>N/A</p>
<p>Necessary outcomes from these systems and strategies</p>	<p><i>Reduce improper payments, maintain local agency integrity, and benefits awarded to eligible households.</i></p>

**60% of State Median Income by Household Size  
For Use in Federal Fiscal Year 2012  
Estimated State Median by Household Size-Source HHS**

<b>Household Unit Size</b>	<b>Annual Income</b>	<b>Monthly Income</b>
1	\$22,493	\$1,874.43
2	\$29,414	\$2,451.17
3	\$36,335	\$3,027.92
4	\$43,256	\$3,604.67
5	\$50,177	\$4,181.41
6	\$57,098	\$4,758.16
7	\$58,396	\$4,866.30
8	\$59,693	\$4,974.44
9	\$60,991	\$5,082.58
10	\$62,289	\$5,190.72
11	\$63,586	\$5,298.86
12	\$64,884	\$5,407.00
Each Additional Member	\$1,298	\$108.17

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**2012 Payment Matrix**

**Region 1** – Benton, Clackamas, Clatsop, Columbia, Coos, Curry, Douglas, Jackson, Josephine, Lane, Lincoln, Linn, Marion, Multnomah, Polk, Tillamook, Washington and Yamhill Counties.

	Income Range		STANDARD					SUBSIDIZED				
			Electric	Gas	LG	Wood	Oil	Electric	Gas	LG	Wood	Oil
<b>1</b>	\$ -	\$ 5,624	\$295	\$290	\$345	\$250	\$470	\$150	\$150	\$170	\$150	\$235
	\$ 5,625	\$ 11,247	\$255	\$250	\$295	\$250	\$405	\$150	\$150	\$150	\$150	\$200
	\$ 11,248	\$ 16,870	\$250	\$250	\$250	\$250	\$335	\$150	\$150	\$150	\$150	\$165
	\$ 16,871	\$ 22,493	\$250	\$250	\$250	\$250	\$270	\$150	\$150	\$150	\$150	\$150
<b>2</b>	\$ -	\$ 7,354	\$410	\$400	\$475	\$250	\$550	\$205	\$200	\$235	\$150	\$325
	\$ 7,355	\$ 14,707	\$350	\$345	\$405	\$250	\$550	\$175	\$170	\$200	\$150	\$275
	\$ 14,708	\$ 22,061	\$290	\$285	\$340	\$250	\$465	\$150	\$150	\$170	\$150	\$230
	\$ 22,062	\$ 29,414	\$250	\$250	\$270	\$250	\$370	\$150	\$150	\$150	\$150	\$185
<b>3</b>	\$ -	\$ 9,084	\$440	\$430	\$510	\$250	\$550	\$220	\$215	\$255	\$150	\$350
	\$ 9,085	\$ 18,168	\$380	\$370	\$440	\$250	\$550	\$185	\$185	\$220	\$150	\$300
	\$ 18,169	\$ 27,252	\$315	\$310	\$365	\$250	\$500	\$155	\$155	\$180	\$150	\$250
	\$ 27,253	\$ 36,335	\$250	\$250	\$290	\$250	\$400	\$150	\$150	\$150	\$150	\$200
<b>4</b>	\$ -	\$ 10,814	\$455	\$450	\$530	\$250	\$550	\$225	\$225	\$265	\$150	\$360
	\$ 10,815	\$ 21,628	\$390	\$385	\$455	\$250	\$550	\$195	\$190	\$225	\$150	\$310
	\$ 21,629	\$ 32,442	\$325	\$320	\$380	\$250	\$520	\$160	\$160	\$190	\$150	\$260
	\$ 32,443	\$ 43,256	\$260	\$255	\$300	\$250	\$415	\$150	\$150	\$150	\$150	\$205
<b>5</b>	\$ -	\$ 12,545	\$495	\$485	\$550	\$250	\$550	\$245	\$240	\$285	\$150	\$390
	\$ 12,546	\$ 25,089	\$425	\$415	\$490	\$250	\$550	\$210	\$205	\$245	\$150	\$335
	\$ 25,090	\$ 37,633	\$350	\$345	\$410	\$250	\$550	\$175	\$170	\$205	\$150	\$280
	\$ 37,634	\$ 50,177	\$280	\$275	\$325	\$250	\$445	\$150	\$150	\$160	\$150	\$220
<b>6</b>	\$ -	\$ 14,275	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 14,276	\$ 28,549	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 28,550	\$ 42,824	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 42,825	\$ 57,098	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235
<b>7</b>	\$ -	\$ 14,599	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 14,600	\$ 29,198	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 29,199	\$ 43,797	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 43,798	\$ 58,396	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235
<b>8</b>	\$ -	\$ 14,924	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 14,925	\$ 29,847	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 29,848	\$ 44,770	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 44,771	\$ 59,693	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235
<b>9</b>	\$ -	\$ 15,248	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 15,249	\$ 30,496	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 30,497	\$ 45,744	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 45,745	\$ 60,991	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235
<b>10</b>	\$ -	\$ 15,573	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 15,574	\$ 31,145	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 31,146	\$ 46,717	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 46,718	\$ 62,289	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235
<b>11</b>	\$ -	\$ 15,897	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 15,898	\$ 31,794	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 31,795	\$ 47,690	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 47,691	\$ 63,586	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235
<b>12</b>	\$ -	\$ 16,221	\$520	\$510	\$550	\$250	\$550	\$260	\$255	\$300	\$150	\$415
	\$ 16,222	\$ 32,442	\$445	\$440	\$520	\$250	\$550	\$220	\$220	\$260	\$150	\$355
	\$ 32,443	\$ 48,663	\$370	\$365	\$430	\$250	\$550	\$185	\$180	\$215	\$150	\$295
	\$ 48,664	\$ 64,884	\$295	\$290	\$345	\$250	\$475	\$150	\$150	\$170	\$150	\$235

**2012 Payment Matrix**

**Region 2 – Baker, Crook, Deschutes, Gilliam, Grant, Harney, Hood River, Jefferson, Klamath, Lake, Malheur, Morrow, Sherman, Umatilla, Union, Wallowa, Wasco, and Wheeler Counties.**

	Income Range		STANDARD					SUBSIDIZED				
			Electric	Gas	LG	Wood	Oil	Electric	Gas	LG	Wood	Oil
<b>1</b>	\$0	\$5,624	\$325	\$315	\$375	\$250	\$515	\$160	\$155	\$185	\$150	\$255
	\$5,625	\$11,247	\$275	\$270	\$320	\$250	\$440	\$150	\$150	\$160	\$150	\$220
	\$11,248	\$16,870	\$250	\$250	\$265	\$250	\$365	\$150	\$150	\$150	\$150	\$180
	\$16,871	\$22,493	\$250	\$250	\$250	\$250	\$295	\$150	\$150	\$150	\$150	\$150
<b>2</b>	\$0	\$7,354	\$445	\$435	\$520	\$250	\$550	\$220	\$215	\$260	\$150	\$355
	\$7,355	\$14,707	\$380	\$375	\$445	\$250	\$550	\$190	\$185	\$220	\$150	\$305
	\$14,708	\$22,061	\$320	\$310	\$370	\$250	\$505	\$160	\$155	\$185	\$150	\$250
	\$22,062	\$29,414	\$255	\$250	\$295	\$250	\$405	\$150	\$150	\$150	\$150	\$200
<b>3</b>	\$0	\$9,084	\$480	\$470	\$550	\$250	\$550	\$240	\$235	\$280	\$150	\$380
	\$9,085	\$18,168	\$410	\$405	\$480	\$250	\$550	\$205	\$200	\$240	\$150	\$325
	\$18,169	\$27,252	\$345	\$335	\$400	\$250	\$545	\$170	\$165	\$200	\$150	\$270
	\$27,253	\$36,335	\$275	\$270	\$320	\$250	\$435	\$150	\$150	\$160	\$150	\$215
<b>4</b>	\$0	\$10,814	\$500	\$490	\$550	\$250	\$550	\$250	\$245	\$290	\$150	\$395
	\$10,815	\$21,628	\$425	\$420	\$495	\$250	\$550	\$210	\$210	\$245	\$150	\$340
	\$21,629	\$32,442	\$355	\$350	\$415	\$250	\$550	\$175	\$175	\$205	\$150	\$280
	\$32,443	\$43,256	\$285	\$280	\$330	\$250	\$450	\$150	\$150	\$165	\$150	\$225
<b>5</b>	\$0	\$12,545	\$540	\$525	\$550	\$250	\$550	\$270	\$260	\$310	\$150	\$425
	\$12,546	\$25,089	\$460	\$450	\$535	\$250	\$550	\$230	\$225	\$265	\$150	\$365
	\$25,090	\$37,633	\$385	\$375	\$445	\$250	\$550	\$190	\$185	\$220	\$150	\$305
	\$37,634	\$50,177	\$305	\$300	\$355	\$250	\$490	\$150	\$150	\$175	\$150	\$245
<b>6</b>	\$0	\$14,275	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$14,276	\$28,549	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$28,550	\$42,824	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$42,825	\$57,098	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255
<b>7</b>	\$0	\$14,599	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$14,600	\$29,198	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$29,199	\$43,797	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$43,798	\$58,396	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255
<b>8</b>	\$0	\$14,924	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$14,925	\$29,847	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$29,848	\$44,770	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$44,771	\$59,693	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255
<b>9</b>	\$0	\$15,248	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$15,249	\$30,496	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$30,497	\$45,744	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$45,745	\$60,991	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255
<b>10</b>	\$0	\$15,573	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$15,574	\$31,145	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$31,146	\$46,717	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$46,718	\$62,289	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255
<b>11</b>	\$0	\$15,897	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$15,898	\$31,794	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$31,795	\$47,690	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$47,691	\$63,586	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255
<b>12</b>	\$0	\$16,221	\$550	\$550	\$550	\$250	\$550	\$285	\$280	\$330	\$150	\$450
	\$16,222	\$32,442	\$485	\$480	\$550	\$250	\$550	\$245	\$240	\$280	\$150	\$385
	\$32,443	\$48,663	\$405	\$400	\$470	\$250	\$550	\$200	\$200	\$235	\$150	\$320
	\$48,664	\$64,884	\$325	\$320	\$375	\$250	\$515	\$160	\$160	\$185	\$150	\$255

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